



# Servier Guidelines for Responsible Lobbying





## Objectives

*Servier is committed to therapeutic progress to serve patient needs. This vocation guides Servier's actions and behaviour as a pharmaceutical company and as an active contributor to society.*

*In a rapidly changing environment, with growing patient needs, Servier believes that pharmaceutical companies must actively work to address current global health challenges. This involves continuous exchange and the development of comprehensive and coordinated solutions with stakeholders from the healthcare sector, as well as Policymakers at every level of government (international, federal, state, municipal and local governments). Through this steady effort, Servier intends to support the growth of innovation and contribute to shaping future sustainable healthcare systems.*

*Lobbying aims to strengthen Servier's capacity to anticipate and take part in the evolution of its environment, to improve health and quality of life for patients. It provides at the same time a legitimate opportunity for promoting its vision and enhancing its reputation toward society. Servier shall conduct lobbying with the utmost integrity and in a transparent manner. Our lobbying must always seek to avoid discrediting or reducing confidence in our company and the pharmaceutical industry. These guidelines are aimed at supporting that effort.*



## Scope and Applicability

These guidelines apply to Servier employees and third parties retained by Servier to lobby on behalf of the company, in every country where Servier operates.

Both Servier employees and third parties contracted to provide lobbying services are expected to understand and follow the same level of requirements. Selecting third parties who represent Servier is conducted in line with our third-party due diligence policies and procedures.

These guidelines are broadly communicated internally, and training sessions are provided to Servier's management and to all those involved with lobbying activities, to ensure consistency in the implementation and observance of these guidelines.

## Integrity in What We Do



Integrity is encompassed in Servier's Ethical Charter as a driving principle for interactions with our partners and the stakeholders with whom we engage. As part of our commitment to responsible and transparent lobbying, integrity guides our activities in all the countries where we operate and requires that we always seek to:

1. Uphold the highest ethical standards, laws, regulations, and industry codes applicable to us;
2. Respect the diversity of opinions with and independence of Policymakers and stakeholders;
3. Show honesty in the way we interact;
4. Provide truthful, fair, balanced, accurate, complete, up-to-date and substantiated information;
5. Use reasonable resources in consideration of the objectives we follow.

We reject any actual conflict of interest and we commit to make all efforts not to place Policymakers and stakeholders in a position of conflict with their duties and obligations. We proactively address any potential conflict of interest which is brought to our attention.

If allowed by laws, regulations, codes and the standards of the relevant institution and in line with our anti-corruption policy, we may provide hospitality to Policymakers and stakeholders in connection with, and for the duration of, legitimate activities and only if appropriate, reasonable, incidental and secondary to the main purpose of the activity. Such hospitality will comply with any required authorization, any applicable limits and will be disclosed as required by the applicable transparency standards. Providing gifts to or entertainment for Policymakers is strictly prohibited.

We do not employ or contract any former Policymakers unless legal and ethics advice is sought, including on the necessary cooling-off period that may be required and such cooling-off period has expired. We make sure that the selected persons have the required qualifications and that the selection process is fair, transparent and objective.



## Transparency in What We Do

Transparency sustains our commitment to integrity and contributes to make our approach to lobbying more responsible.

Transparency means in this context, to comply with any disclosure or transparency requirement, applicable to lobbying activities in the countries we operate. It also involves making it clear and unambiguous to Policymakers and stakeholders that an activity is conducted on behalf of Servier, with its support or for its benefit. We are transparent about the data we collect and use in compliance with international personal data protection standards and the Servier Data Privacy Policy.



## Definitions

In the context of these guidelines, a “Policymaker” is a person with power to influence or determine policies and practices at an international, regional or local level. They could be public officials and/or government officials, but may also be advisors, consultants or counsellors to politicians or political parties.

In the context of these guidelines, “lobbying” refers to interactions with Policymakers and other stakeholders, conducted with the objective of representing Servier’s perspective in the policy-making process as well as its commitment to therapeutic progress to serve patient needs, in the interest of public health. The active contribution of all stakeholders to the policy-making process is a genuine, integral part of the democratic debate, it fosters diversity and the legitimate representation of interests, informing Policymakers and allowing them to make the best possible decisions in the public interest.