

# SERVIER GROUP DUTY OF VIGILANCE PLAN

## 2021–2022 Fiscal Year<sup>1</sup>

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<sup>1</sup> Duty of Vigilance plan drafted and published in February 2023 for 2021–2022 fiscal year.



## A. Presentation of Servier Group

### 1. About Servier

Founded to serve health, Servier is an international pharmaceutical Group governed by a Foundation, which aspires to have a significant positive societal impact for patients and a sustainable world. The unique governance model allows the company to be fully dedicated to its vocation with a long-term vision: Committed to therapeutic progress to serve patients. The Group's 21,400 employees are committed to this common vocation, which is a source of daily inspiration.

A world leader in cardiology, Servier's ambition is to become a recognized, focused, and principal innovative player in oncology by targeting cancers that are difficult to treat. To this end, the Group devotes more than 50% of its R&D budget to the development of targeted and innovative oncology therapies. Neuroscience and immuno-inflammatory diseases are a future growth driver. In these fields, Servier is focusing on a limited number of specific diseases in which precise patient characterization makes it possible to propose a targeted therapeutic response with precision medicine. To facilitate access to quality care for all, and at a lower cost, the Group also provides a range of generic medicines covering the majority of diseases, supported by strong brands in France, Eastern Europe, Brazil, and Nigeria.

In all these areas, the Group incorporates the patient's voice at every stage of the medicinal product's life cycle. Headquartered in France, Servier has a solid geographical presence in more than 150 countries and generated a revenue of 4.9 billion euros in 2022.



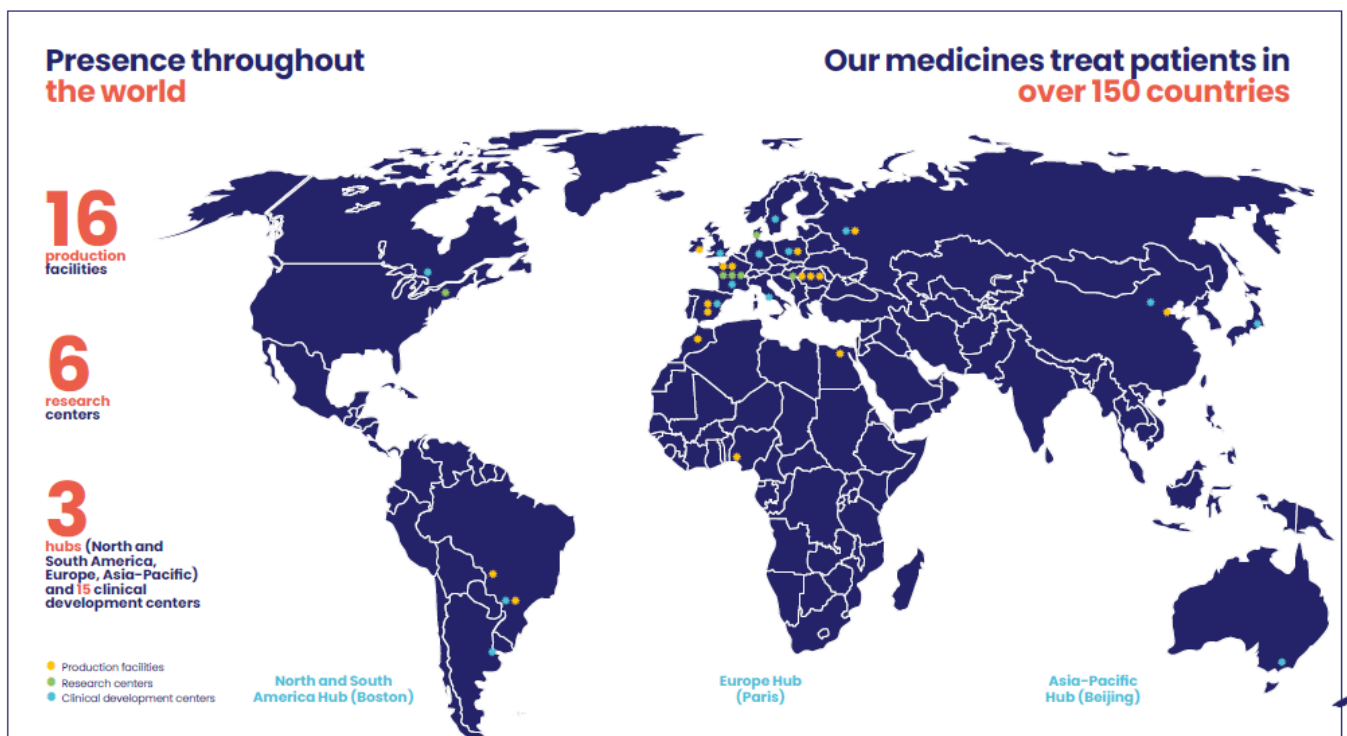


## 1. An International Group

☑ **16 Production sites:** Servier has chosen to set up its 16 production sites as close as possible to patient needs in order to ensure safe transport and the timely availability of medicines. Of these 16 production sites, 11 are dedicated to the Group's brand-name medicinal products.

☑ **6 Research centers:** The Group's research facilities are located in Denmark, France, Hungary, and, since April 2021, in the United States, following the acquisition of the oncology division of Agios Pharmaceuticals. In Denmark, Symphogen is the Group's center of excellence for antibodies, as its platform can provide antibodies with unique features and high potential. In France, research centers are specialized in the discovery of new medicines in areas where medical needs are greatest. The same is true for the Budapest center in Hungary, whose expertise lies in medicinal chemistry.

☑ **3 Hubs:** There are 3 hubs (North and South America, Europe, Asia-Pacific) with 15 clinical development centers that conduct local clinical trials in the Group's therapeutic areas. These International Centers for Therapeutic Research (ICTRs) are comprised of highly qualified in-house teams.



► Learn more about Servier Group: [www.servier.com](http://www.servier.com)



## B. Duty of Vigilance

### 1. Law relating to the Duty of Vigilance of parent companies and initiating companies

In accordance with the provisions of the French Commercial Code, companies employing more than 5,000 employees in France, or more than 10,000 employees worldwide, are subject to French Law No. 2017-399 of 20 March 2017 on the Duty of Vigilance. The scope of the Act includes: Activities of the parent company, subsidiaries, and controlled companies within the meaning of Article II of Article L 233-16 of the French Commercial Code as well as the activities of subcontractors or suppliers with whom an established commercial relationship is maintained.

Article L 225-102-4 of the French Commercial Code requires companies to draw up a Duty of Vigilance plan to identify and prevent serious risks and violations of human rights and fundamental freedoms, the health and safety of persons, and the environment, resulting from their activities as well as those of their subcontractors and suppliers.

The Duty of Vigilance plan must include:

- Risk mapping focused on human rights and fundamental freedoms, personal health and safety, and the environment;
- Regular assessment procedures of the situation of all Group subsidiaries, subcontractors and suppliers;
- Appropriate actions to mitigate risks or prevent serious harm;
- Mechanism for alerting and reporting;
- System for monitoring the measures implemented and evaluating their effectiveness.

### 2. Governance and management of Servier Duty of Vigilance Plan

Since the publication of the Duty of Vigilance Act, Servier Group has set up a working group to address the obligations arising from this law. The working group is comprised of members representing the CSR, Finance/Purchasing, Risk Management, Internal Control & Assurance departments. Project progress, actions taken, and results are presented to the members of the Executive Committee who sponsor the initiative.

The Group's Duty of Vigilance Plan is updated each year with the measures applied, as well as the action plan for the coming years. The items presented below were prepared by the working group in charge of implementing the obligations of the Duty of Vigilance Act. They were validated by the two members of the Executive Committee who sponsor the Group's Duty of Vigilance initiative.



## C. Risk Mapping

### 1. Methodology for identifying and prioritizing risks

Servier Group is committed to risk management according to best practices and regulatory requirements. Its approach is based on international standards such as COSO (*Committee of Sponsoring Organizations of the Treadway Commission*) and ISO 31000. This is to ensure the robustness of the proposed method for identifying, analyzing, assessing, and dealing with risks, and then monitoring and following up on them.

The working group determined Servier Group's risk universe, which consists of the following categories:

- Environmental risks;
- Human rights, fundamental freedoms, health and safety of workers;
- Human rights, fundamental freedoms, health and safety of local communities;
- Human rights, fundamental freedoms, health and safety of patients.

Rating scales were established based on those used for the Group's risk mapping:

- "Impact" scale, which measures the consequences of the risk on third parties and the environment;
- "Probability" scale, which measures the risk of occurrence;
- "Control" scale, which measures the current control level of the risk.

Finally, in addition to the interviews, a documentary analysis was carried out in order to identify, analyze, and evaluate activities likely to have an impact on third parties and the environment.

### 2. Scope

Following a preliminary scoping phase based on initial interviews, a sector study, and a documentary analysis, Servier initiated its Duty of Vigilance plan with the activities potentially most at risk for third parties and the environment.

As a result, in light of the major challenges of the Duty of Vigilance, the Group's activities, and the countries where the services are carried out or manufactured, risk mapping was initially completed (for the 2019-2020 fiscal year) for the following areas:

- Production (including subcontracting) of brand-name medicines and its supply chain;
- Research & Development (including subcontracting) of brand-name medicines and its supply chain.

The 2020-2021 fiscal year then made it possible for the Group to consolidate risk mapping within these two areas and to include risks related to the supply chain and manufacturing activities of Biogaran, the Group's generic medicines subsidiary.

Mapping the risks related to the Group's Duty of Vigilance will gradually expand to include the areas not yet covered.



## D. Risk assessment and vigilance measures on activities of the company and its subsidiaries

### 1. Human rights, fundamental freedoms, health and safety of patients

The pharmaceutical industry must meet high standards of quality and safety at all stages of the medicinal product's life cycle, from research, through development and manufacturing, to disposal.

The patient is at the heart of the Group's considerations and, to this end, Servier has an obligation to ensure the ethics and transparency of its clinical trials, and to meet the legal and regulatory requirements in terms of product quality and safety throughout the life cycle of the medicine. Servier respects and must guarantee, for each individual, the protection of personal data and confidential information. The Group is also committed to combatting the counterfeiting and the falsification of medicines in order to prevent any risk to the health of patients. In addition, through its generic businesses (including Biogaran), the Group makes generic medicines available to patients, facilitating access to high-quality treatments at affordable prices.

#### Protection of patients in clinical trials

Servier Group carries out clinical trials throughout the world and therefore ensures compliance with national/international regulations and international standards, such as Good Clinical Practices (GCP) and the Helsinki Declaration.

The Group also complies with the five principles of transparency of the European Federation of Pharmaceutical Industries and Associations (EFPIA) with respect to clinical trials.

**Organization:** Within the Group, clinical trials are managed by high-level expert teams. The proper conduct of these studies requires an organization involving teams, present in 18 countries, which are responsible for coordinating international and local teams, making it possible to manage clinical trials worldwide.

#### **Audits:**

Servier is subject to inspections by the relevant health authorities to ensure compliance with the ethical rules of existing legislation.

In order to ensure compliance with the company's Quality Standards and applicable regulations, Servier has established an annual audit plan for clinical trials, related systems, and subcontractors involved in conducting these trials, using a risk-based approach. This program complements the monitoring of subcontractor carried out by the business units.

#### Pharmaceutical production

The Group adopts responsible practices at each stage of the medicinal product chain.

**Organization:** Servier Group's Industrial Quality Department ensures the continuous improvement of quality standards at brand-name medicine production sites. It also ensures that products comply with registered specifications and that each of the Group's sites complies with national and international quality and traceability standards.



**Audits:** In accordance with international regulations, Servier Group and its subsidiaries are subject to periodic inspections by the relevant authorities. Inspections of manufacturing operations allow health authorities to check the quality control of our medicines, verify compliance with Good Manufacturing Practices, the conformity of batch records and operations carried out in accordance with the specifications recorded in the Marketing Authorization (MA) file and the applicable standards.

After an inspection, an action plan is systematically implemented and then monitored periodically by the Quality Department at each site.

At a central level, the Industry Department ensures that observations notified by the authorities are passed on to all our brand-name production sites and ensures follow-up through “corporate” audits carried out on site and periodic quality reviews carried out remotely.

### **☑ Pharmacovigilance**

The Group is committed to continuously ensuring the quality of our medicines and to the monitoring of adverse events and situations that pose a risk to patient safety.

**Organization:** Servier Group’s Therapeutic Safety Department is in constant communication with the health authorities and has more than 200 employees worldwide who are dedicated to monitoring and assessing all risks related to the use of our medicines. In addition to detecting and assessing these risks, this Department’s role is to propose and develop measures to prevent them. Also, in addition to a central Pharmacovigilance role, each subsidiary has an internal Pharmacovigilance Manager.

**Audits:** Inspections are regularly carried out by the National Agency for Medicinal and Health Product Safety (*Agence nationale de sécurité du médicament et des produits de santé*, ANSM). Pharmacovigilance inspections are designed to monitor the pharmacovigilance practices of companies.

These inspections are managed by the Pharmacovigilance Manager with the assistance of the Pharmacovigilance Department at the Group level.

Locally, pharmacovigilance departments are audited at least every five years by the Regulatory Affairs Department.

**Patient support through dedicated services:** The Pharmacovigilance Department uses service providers to carry out certain operational tasks to retain and safeguard information that can subsequently be made available to patients, such as:

- Scientific literature reviews;
- Archiving;
- Monitoring studies;
- Maintaining and monitoring of cases in databases;
- Maintaining a 24/7 “hotline” also makes it possible to meet the information needs of patients.



**Business continuity:** Data collection on any adverse effects is always undertaken, even in the event of *force majeure* (e.g., pandemic, etc.), and in a degraded operation mode, in order to guarantee an optimal level of knowledge on the benefits and risks of medicines. Adverse reactions are constantly collected, analyzed, and processed.

**Deployed activities and processes:** In addition, pharmacovigilance training is provided to all Group employees so that they are able to provide alerts on possible side effects reported related to taking our medicines.

**Alert mechanism for patients:** The Group is committed to continuously ensuring the quality of its products and the monitoring of adverse reactions and any other situations that could jeopardize patient safety. There is a dedicated page on the Servier.com website that allows patients to report adverse effects directly to the MA holder

<https://servier.com/contactez-nous/#declarer-un-effet-indesirable>

<https://biogaran.fr/pharmacovigilance/>

<https://int.egis.health/pharmacovigilance-en>

### **☑ Data protection**

**Organization:** Servier has set up a governance structure dedicated to the protection of privacy and personal data, with the appointment of a Data Protection Officer at the Group level, local Data Protection Officers and compliance representatives in the subsidiaries responsible for coordinating all these aspects.

**Measures in place:** The Group has implemented several internal policies and procedures to facilitate and ensure compliance with rules within the organization. Servier Group is committed, notably through its Privacy and Personal Data Protection Policy, to preserving the confidentiality and security of personal data processed: patients, candidates, employees, customers, and other stakeholders such as healthcare professionals, medical representatives, and pharmacists. To this end, Servier has implemented Binding Corporate Rules (BCR), which aim to ensure that the same level of protection is respected across all entities, and to regulate the transfer of Personal Data across the entire organization, including countries outside the European Union, in accordance with the General Data Protection Regulation (GDPR).

Servier ensures adherence to its Privacy and Personal Data Protection Policy within the organization through ongoing employee training.

### **☑ Fight against counterfeit medicines**

**Organization:** Servier is actively committed to the fight against counterfeit medicines. The initiative is driven by the Trademark Department and operational support in the subsidiaries, the so-called *Local Responsible Persons for Falsification* (LRPF). The Industry, Quality (Assurance and Control), Pharmacovigilance, and Regulatory Affairs departments are also involved.

**Measures in place:** The system set up by Servier is based on three pillars:

- **Early detection** of counterfeit medicines through systematic reporting of suspected cases by Group employees, and more specifically through dedicated teams in both France and internationally. The Group has a contact person in each country and teams





responsible for product analysis at industrial sites and the *Technologie Servier* laboratory.

- **Prevention** through awareness and training programs for employees, customs officers, law enforcement officers, and health authorities, as well as the implementation of a dedicated operating procedure. The Group also relies on its enhanced serialization program that ensures the traceability, identification, and integrity of medicines in Europe. In addition, to prevent the counterfeiting of its most vulnerable products, Servier has implemented a smartphone solution for authenticating medicines (Securistamp) in at-risk countries.
- **Being proactive** by collaborating with other French, European, and international companies and authorities (health, law enforcement, and customs), such as EFPIA, WHO, INTERPOL, and WCO. Servier Group is also an active member of the Pharmaceutical Security Institute (PSI, international organization) and G5 Santé (comprised of 8 French companies). These associations make it possible to carry out joint actions (e.g., Internet monitoring activities), identify cases of counterfeit medicines, and share information between the various players.

## 2. Human rights, fundamental freedoms, health and safety of workers.

### Human rights and fundamental freedoms

Servier attaches significant importance to the respect of all human rights and fundamental freedoms in the countries where it operates, as well as in the countries where suppliers and subcontractors are based. Coordination is carried out at the head office so that protection and insurance plans are provided at all Group sites, as well as more comprehensive health coverage for employees in many countries, regardless of current legislation.

In order to strengthen social engagement, Servier set up a “Servier consultation body” in France in 2020.

#### Action plan:

- Setting out a Servier Human Rights Policy
- Code of conduct update and training on human rights and fundamental freedoms

### Combating discrimination and sexist behavior

Employees must work in a calm and safe environment, free from any form of discrimination or harassment.

Servier is resolutely committed to combating discrimination in recruitment practices and in the workplace. In 2020, the Group established the *Servier Commitment to Diversity and Inclusion*, signed by all members of the Executive Committee. This founding document sets out the principles applicable to all Group entities: Combating all forms of discrimination, promoting diversity, and developing an even more inclusive work environment.



In order to contribute to professional equality at all levels and to fight against the glass ceiling, the Group has set itself the objective of achieving a percentage of at least 40% of women in Top Management by 2025. Several measures to promote greater gender equality have been put in place, such as the Gender Network (*Réseau mixité*) at the head office, which was launched at the end of 2021, and the #StopE initiative against sexism. In France, the network for sexual harassment and gender-based violence referents was reactivated in 2022. This network, made up of elected employee representatives and company representatives, has received training and is preparing a joint action plan.

In France, Servier is also involved with the HandiEM association (*Handicap Entreprises du Médicament*), carrying out actions to recruit people with disabilities, maintaining employment, and engaging in collective projects (e.g., awareness and training sessions).

Since 2020, Servier has organized an annual Diversity and Inclusion Week with the aim of raising employee awareness on the topics and challenges of Diversity and Inclusion.

**Indicators:**

<b>Professional equality as of 30 Sept.</b>	<b>2021</b>	<b>2022</b>
Percentage of women managers (Group)	45 %	48 %
Percentage of women on the Executive Committee (Group)	27 %	27 %
Percentage of women in Top Management (Group)	29 %	26 %
Professional equality index score (France)	<a href="#">Click here</a>	
<b>Disability (France)</b>		
Direct employment rate of disabled workers	2.95%	2.99 %

**Action plan:**

- Online training course consisting of a module on diversity and inclusion, and a second on combating sexism in the workplace. This course is mandatory for all employees in France.
- Launch of “She Is Servier”, an international women’s leadership development program.
- Disability action plan to improve the recruitment of disabled persons in France and the roll out of best practices internationally.

**☑ Health and safety of workers (Employee health and safety)**

Risks to the health and safety of workers are issues inherent to industrial activity, with risks of work-related accidents on sites, and risks of occupational diseases (prolonged exposure to chemicals, musculoskeletal disorders, psychosocial risks, etc.).

The health and safety of our teams is a major priority. Operating methods must ensure a working environment that is designed and organized around these priorities. Servier must promote a culture where everyone is involved in their own safety and that of others.

**The Group-wide Health, Safety, and Environment (HSE) policy** was updated in February 2020, setting out the main principles and guidelines that apply to all subsidiaries in this area, as well as a related documentation system (i.e., reference manual, guide, procedures). As an example, in July 2022, a guide was distributed to all Group subsidiaries to communicate the fundamental HSE principles to follow for tertiary activities.



**Organization:** The Corporate HSE function, attached to the CSR Department, is responsible for steering and coordinating HSE policy. Production and R&D sites rely on a local team of HSE specialists in charge of implementing appropriate local technical, organizational, and human solutions to control risks to human health and safety and the environment. At the subsidiary level, at least one contact person must be identified to coordinate HSE actions at his or her site.

**SAFE program:** In April 2021, the Group launched its SAFE safety culture program, which aims to disseminate the common elements of a safety culture and reduce the risk of accidents. In addition to delivering a common vision, it includes a number of tools developed in collaboration with the sites, allowing all employees to be involved in safety on a daily basis. For example, the “*Visit & Communication on Safety*” tool is an application that guides managers through their safety visits and helps them talk about safety on a daily basis.

This program and related tools will gradually be rolled out at all Group sites, particularly industrial and research sites. At some sites, including three ISO 45001-certified sites, it will reinforce the safety management systems already in place and revitalize the programs that have already been launched.

**Indicators:** The frequency of workplace accidents are measured at the Group’s research and production sites. This indicator is complemented by monitoring and result indicators from the HSE Group roadmap to 2025. For example, by 2025, 100% of managers at R&D and industrial sites will be trained in “Safety Leadership”, a key component of a successful safety culture.

<b>Lost time injury frequency rate (LTIFR)</b>	<b>2021</b>	<b>2022</b>
Employees from Servier R&D, industry (brand-name and generic medicines), Global (Servier Monde) and Biogaran headquarters	3.8	2.98

**Action plan:**

- Dissemination of “Safety Golden Rules”, rules that save.
- “Safety Leadership” training program for industrial site managers.
- Cross-industrial site HSE audits.
- Group-wide eLearning program on road safety to reduce accidents on our sites and in our subsidiaries.



**Prevention of psychosocial risks (PSR):** The psychosocial risk prevention system, in line with the Group's values and CSR strategy, has been strengthened since January 2022.

**Organization:** In France, PSR prevention is based on a three-tiered organization:

- A global coordination committee, made up of HR and employee representatives, monitors global indicators and defines and implements primary, secondary, and tertiary prevention action plans.
- A steering committee determines the guidelines and supports the actions of the coordination committee.
- A multi-disciplinary PSR committee, including employee representatives in each local area, and in close contact with employees, contributes to global actions, monitors indicators and local action plans, and provides support in PSR situations.

**PSR program:** The PSR program aims to provide contributors and employees with better training and practical tools and to raise awareness through regular communication. To this end, actions have already been carried out at all sites in France, such as the establishment of local PSR committees and psychological services available to employees, training for managers, and communication actions such as a poster campaign to challenge preconceived ideas and misconceptions. At the international level, a page dedicated to PSR is available on the Group's intranet platform, a practical information kit with guidelines for preventing, identifying, and supporting PSR has been provided to all managers, and a "leaflet" has been made available to all employees to help eliminate the taboo of PSR, raise awareness on how to act when they experience or witness a situation of ill-being or malice at work, and whom to contact for support where appropriate.

**Action plan (France):**

- Primary prevention: Better equip teams to analyze and regulate workloads
- Secondary prevention: Roll out a mandatory eLearning program for all employees, organize a PSR communication day in April
- Tertiary prevention: Finalize the implementation and monitoring of indicators

### **3. Human rights, fundamental freedoms, health and safety of local communities**

Servier Group sites, as well as some of its subcontractors' and suppliers' sites, include Facilities classified for the Protection of the Environment (ICPE-*Installations Classées pour la Protection de l'Environnement*). Two Group production sites are SEVESO classified. Plants and factories may expose local residents to the risk of fire, explosion, or gaseous or liquid effluent emissions, as well as noise and odor pollution. The Group implements specific risk-prevention measures for its sites with regard to the environment, local residents, and communities.



### ☑ **Prevention of industrial risks**

**Organization:** The overall risk management policy is facilitated and coordinated by the Risk, Assurance, and Internal Control Department, which aims to identify, assess, and minimize major risks that may hinder the execution of the strategy, achievement of the Group's objectives and, in particular, limit the impact on third parties and the Environment. The implementation of this policy is formalized through the mapping of major risks for the Group.

A Risk Committee brings together representatives of the various business lines and functions, including the CSR Department, with the task of regularly monitoring risk assessment and associated action plans, and coordinating the Risk Owners' community. Updates on risk-mapping and action-plan monitoring are periodically reported to the Executive Committee.

A Group-wide Health, Safety, and Environment (HSE) policy outlines the main principles and guidelines in this area. Various technical, organizational, and human actions are carried out across the sites with dedicated specialist teams to ensure that these risks are controlled.

**Procedure:** In addition to regulatory monitoring and compliance with relevant regulations (ICPE, SEVESO, REACH, Environmental and Labor Codes, etc.), Servier Group has been implementing risk prevention measures for many years, with the primary objective of avoiding accidents. This is achieved by training personnel, drafting procedures, designing facilities, maintaining equipment, ensuring process safety, ensuring that all teams in the industrial network adopt safety approaches, and regularly verifying compliance with procedures and good practices. In addition to preventive measures, the Group has taken protective measures in the event of an accident, such as automatic fire protection (i.e., fire detection, sprinklers, etc.), with the main objective of protecting people and minimizing the consequences of an incident at the Group's facilities and to the environment.

**Prevention audits:** "Prevention" audits are carried out at the sites of Group subsidiaries and third parties (subcontractors and suppliers). The purpose of these audits is to assess the level of maturity with regard to the preservation of buildings and equipment for the safety of people, the environment, and our activities, and, if necessary, recommendations can be made with a view to continuous improvement. These audits, carried out by internal or external auditors, may take the form of physical visits to sites or evaluation questionnaires sent by email.

## **4. The Environment**

### ☑ **Environmental impacts in the value chain**

In the course of their activities, the Group's sites, subcontractors, and suppliers generate waste and discharge, as well as greenhouse gas emissions that have an effect on climate change. To reduce environmental impacts throughout the value chain, Servier has implemented several actions:

- The Group has used the Life Cycle Analysis (LCA) methodology, which assesses the environmental profile of a medicinal product: extraction of raw materials, design, distribution, use, and end of life, etc. Life Cycle Analysis has made it possible to identify the most impactful stages (raw materials and manufacturing, packaging, transport, etc.) and the first courses of action to reduce risks to the environment and the climate.



- The internal *Green Score* tool, developed on the principles of Green Chemistry to evaluate chemical synthesis and help with the selection of solvents, has been expanded and strengthened with criteria related to the impact on greenhouse gas emissions and biodiversity. By the end of 2023, 100% of our new chemical syntheses will be evaluated using this tool.
- Environmental aspects have also been incorporated into our in-house packaging selection processes, including waste control.

The Environment	2022
7 of our industrial sites, as well as the Group's headquarters in France, are certified or in the process of being certified ISO 14001 and/or ISO 50001.	
Key players trained in eco-design	37

### **☑ Reducing greenhouse gas emissions and energy consumption**

The activities of the Group's sites, subcontractors, and suppliers may generate emissions of "natural" greenhouse gases such as CO<sub>2</sub>, methane and nitrous oxide, and "industrial" greenhouse gases such as halocarbons. These gases contribute to climate change. Furthermore, the nature and volume of energy consumption at the Group's sites may generate greenhouse gas emissions and have other impacts on the environment (resource depletion, pollution, etc.).

**Organization:** The program for reducing the impact of the Group's activities on greenhouse gas emissions is led by the CSR Department, which relies on the business units to implement reduction, decarbonization, and energy efficiency actions and initiatives. Three members of the Executive Committee monitor the program quarterly. In addition, an *Energy Conservation Task Force* was created in 2022 to coordinate and define an energy sobriety action plan to reduce the Group's energy consumption in France by at least 10% by 2025.

**Measures in place:** In order to reduce greenhouse gas emissions overall, the Group is committed to a low-carbon path, the details of which were validated at the end of 2019 by the *Science Based Target initiative* (SBTi). The objective set by the Group is to reduce its carbon footprint by 25% between 2016 and 2030.

Servier began with a comprehensive emissions assessment to determine a reduction action plan involving all the Group's sites and activities. Several actions have been initiated: regeneration of solvents, energy renovation of buildings, purchase or *in situ* production of renewable energy, and increasing use of sea transport as opposed to air transport. (Between 2021 and 2022, the volumes transported by air from the Loiret (France) and Arklow (Ireland) sites were reduced by 5.2% in favor of sea transport for transporting and distributing medicines.)

**Indicators:** An update of the Group's carbon footprint on Scopes 1 and 2 is performed every year, and every two to three years for all Scopes.



<b>Global Group Footprint</b>	<b>2019</b>	<b>2022</b>
Global Group GHG emissions   Scopes 1, 2, 3 (in t CO <sub>2</sub> e)	1 182 9112	Consolidation in progress <sup>1</sup>
Global Emissions Intensity/turnover (in g CO <sub>2</sub> e/€)	256.52	
<b>Scope 1 and Scope 2 Emissions</b>	<b>2021</b>	<b>2022</b>
Direct GHG emissions Scope 1 (in t CO <sub>2</sub> e)	72,747	Consolidation in progress <sup>1</sup>
Indirect GHG emissions Scope 2 (in t CO <sub>2</sub> e)	43,472	
Scope 1 and 2 emissions intensity/turnover (in g CO <sub>2</sub> e/€)	24.7	
<b>Energy consumption Electricity &amp; Gas</b>	<b>2021</b>	<b>2022</b>
Energy consumption in MWh	486,718.6	Consolidation in progress <sup>1</sup>
Share of renewable energies in electricity consumption	9.1%	

**Action plan:**

- Purchase renewable energy
- Extend ISO 50001 or 14001 certification to all industrial and R&D sites by 2030
- Reduce the proportion of air transport in international transportation
- Incorporate eco-design principles into the life cycle of medicines

**☑ Reducing impacts on water**

The activity of the Group's sites, as well as that of certain suppliers and subcontractors, leads to water consumption that is inherent to pharmaceutical industrial activity, which can have an impact on the ecosystem in areas under stress, contributing to the fragility of resources. In addition, wastewater from industrial and research sites containing substances that are hazardous/polluting for fauna, flora, and populations may pose a risk of contamination for the ecosystem if discharged without appropriate treatment and above acceptable thresholds.

A dedicated working group has been set up to share best practices at brand-name medicinal product industrial sites and at sectoral level. Work is underway to limit both water consumption and discharges into the natural environment (COD-chemical oxygen demand and BOD-biological oxygen demand) in accordance with standards to be defined by and for all Group sites.

**Indicators:**

<b>Water consumption (m<sup>3</sup>)</b>	<b>2021</b>	<b>2022</b>
Scope: Industry, R&D and Headquarters sites in France (Suresnes and Biogaran) + Industry sites in Poland, Ireland, and Spain	778,990	777,082
Change between 2022 and 2021		-0.2%

<sup>1</sup> Publication dedicated to the Group's non-financial reporting will be published in Q2 2023 and available on Servier.com



### ☑ Waste reduction

Pharmaceutical activity generates waste (production waste, use waste - cardboard, blister packs, etc.) that can have a direct impact on the environment.

There is a system for specific waste management at the sites, particularly for “hazardous” waste (sorting, storage, transport, disposal). At some sites, the management system is even more advanced through ISO 14001 certification (for 50% of industrial sites), and other sites are in the process of being structured. The Group avoids landfill as much as possible (target less than 1% of waste landfilled by 2025): According to the waste classification, it is either recycled or incinerated (with energy recovery), and is only landfilled as a last resort, only if no local channel exists. Waste management as a whole is being improved with a focus on recycling schemes and a good practice guide to encourage recovery.

#### Indicators:

<b>Waste (tons):</b> Industry, R&D, and Headquarters sites in France (Suresnes and Biogaran) + Industry sites in Poland, Ireland, and Spain	<b>2021</b>	<b>2022</b>
Total weight of waste (hazardous and non-hazardous)	52,914.25	Consolidation in progress
Total weight of recycled waste (hazardous and non-hazardous)	17,408.08	
Total weight of waste recycled and incinerated with energy recovery (hazardous and non-hazardous)	26,433.00	

### ☑ Protection of biodiversity

Impacts related to greenhouse gas emissions, water or air pollution that could result from the activities of the Group, subcontractors or suppliers may themselves create a risk of destroying ecosystems and thus change the rate of natural extinction of species.

A diagnostic study was conducted in 2021 on Servier's dependence on ecosystems, the impacts of its activities on biodiversity, the state of biodiversity around the Group's sites, and the actions already in place or being implemented. Following this study, Servier formalized its Biodiversity strategy by joining the act4nature international initiative in 2021. Servier thus adheres to the 10 commitments defined by act4nature international, and has also taken additional measures to:

- Assess and reduce the impact of our products and sites on biodiversity;
- Raise awareness and develop internal skills on biodiversity issues;
- Participate in biodiversity protection projects.

**Actions:** Among the actions carried out in 2022-2023 is the strengthening of the biodiversity dimension in the internal Green Score tool, which assesses the impact of chemical synthesis on the environment. In parallel, an initial packaging diagnostic was carried out at the Group's main pharmaceutical site (Loiret), making it possible to identify drivers to reduce the impact of packaging on biodiversity.

The Servier Research & Development Institute at Paris Saclay aims to obtain the *BiodiverCity* label, the first international label for the consideration of biodiversity in construction and renovation projects that incorporate and enhance nature, plant life, and living things.





[Comprehensive indicators and action plan available at www.act4nature.com](http://www.act4nature.com)

## E. Risk Assessment and Vigilance measures regarding Supplier and Subcontractor Activities

### 1. Clinical trials

In order to verify compliance with company Quality standards and applicable regulations, Servier outlines an annual plan for subcontractors involved in the conduct of clinical studies for its brand-name products. This program complements subcontractor monitoring carried out by the business units.

### 2. Regulatory requirements for industrial subcontractors

“Quality” management vis-à-vis our brand-name medicine subcontractors is provided by the Industrial Quality Department, as well as the quality structures of Servier’s production sites, and meets the requirements of national and international provisions in force, such as Good Manufacturing Practices, European Directive 2003/94/EC, and the risk management process (ICH Q9).

These “Quality” rules are enforceable and their proper application to the manufacturing activities at industrial sites is assessed during inspections carried out periodically by the health authorities of each country. Compliance with these rules is also periodically assessed during audits carried out by us at the sites of our subcontractors and critical suppliers. The frequency of these audits is determined on the basis of a quality risk analysis.

For Biogaran, audits are carried out every three years with manufacturers of finished products and active drug substances. In the case of a manufacturer who purchases the active drug substance directly, Biogaran requires its supplier’s audit report.

### 3. Sustainable Procurement and supplier risk management

**Organization:** Servier Group is committed to Sustainable Procurement and ensures that its suppliers are selected according to their ethical and compliance practices, and develops a responsible relationship with them.

Accordingly, in 2019, a Group Sustainable Procurement Director was appointed with the objective of rolling out the principles of Sustainable Procurement with the brand-name medicine scope, based on the ISO 20400 standard. As part of this initiative, buyers were made aware of the risks covered by the Duty of Vigilance Act through an eLearning course on Sustainable Procurement.

A team dedicated to identifying and evaluating third parties was also set up within the Finance Department to meet new regulatory obligations (Duty of Vigilance, GDPR, *Loi Sapin II*, etc.) and to support, inform, and make the business units aware of the risks when selecting suppliers and subcontractors. The unit coordinates the Supplier CSR Risk Identification and Assessment Program.

**Supplier Risk Identification and Assessment Program:** In order to manage the risks associated with its supply chain, Servier Group is rolling out a supplier and subcontractor identification and assessment tool. This evaluation procedure initially deals with purchases paid for from France,



excluding generics, and which fall within the scope of the Purchasing Department. The following are subject to this procedure:

- New suppliers (legal entity);
- Strategic suppliers;
- Contract renewals;
- Potential finalists in a call for tenders.

Supplier evaluations are conducted with regard to the following risk types:

- Financial health and economic dependence;
- Prevention of corruption and influence peddling;
- Respect for human rights, health and safety and the environment;
- Compliance with personal data regulations;
- Combatting illegal employment;
- IT data security.

The program is tasked with identifying potential risks based on criteria related to the contract amount, the purchase category, and the country of production or performance of the service. Depending on the outcome of this preliminary phase, the supplier may be subject to a more in-depth assessment of the identified potential risk(s). The elements relating to the evaluations are archived in the tool dedicated to the supplier assessment program and replicated in the Group's supplier repository.

To evaluate the CSR practices of suppliers and subcontractors, Servier has chosen the EcoVadis platform. The independent evaluation conducted by EcoVadis experts includes an analysis of the responses provided by suppliers and subcontractors, followed by a verification of the data with external resources (reports or requests from NGOs, unions, governments, databases, press, etc.). Based on this assessment and the level of risk, prevention and mitigation measures are then proposed.

The plan is to eventually include, in the listing and assessment process, the suppliers and subcontractors for purchases paid for by France that are not covered by the Purchasing Department, as well as those in the international and generic scope. The Group's program and reference documents are already available on the [servier.com](https://servier.com/en/our-commitments/for-suppliers/) website, in the *Supplier Relations* section: <https://servier.com/en/our-commitments/for-suppliers/>

**Indicators:** In December 2022, the average EcoVadis score out of 383 tier 1 and 2 suppliers evaluated was 59.2/100.

#### **4. Contractual provisions**

In order to secure its contractual relationship with third parties on CSR positions, Servier has included a special appendix relating to the company's corporate social responsibility with regard to general ordering conditions of brand name medicines. The content of this clause, available in French and English, invites the parties to adhere to the principles set out in the Servier Group's CSR webpage, which can be found at the following address: <https://servier.com/engagements/>

Eventually, it is planned to include this clause in all Group contracts.



## F. Alert and Reporting Mechanism

### 1. Ethics line

A whistle-blowing mechanism is available to all Servier Group employees and third parties, allowing them to report, in confidence, situations that may affect the health and safety of employees and facts (within or outside the Group) that may be contrary to the Group's legal obligations and/or ethical principles. This scheme covers the risks covered by the French Duty of Vigilance act. Accessible via the link <http://servier.whispli.com/ethicsline>, the Ethics Alert Line is a platform that preserves the anonymity of whistleblowers and protects their identity.

The Ethics Alert Line referent is the Ethics Office, which is responsible for processing and investigating alerts where appropriate. The Ethics Office ensures that all reported facts are properly studied and documented and implements all necessary means to process and investigate alerts by carrying out the necessary verification operations.

### 2. Specific alert mechanisms related to medicines

In addition to this system, Servier has set up specific alert mechanisms to ensure the continuous quality of its medicines and the monitoring of adverse events and situations that could jeopardize patient safety (quality defects, suspected counterfeiting, etc.): <https://servier.com/contactez-nous/#declarer-un-effet-indesirable>

## G. Monitoring measures implemented and evaluating their effectiveness

### 1. Reporting

Servier monitors the effectiveness of its actions through annual non-financial reporting. Information and publications relating to the Group's Vigilance approach and its non-financial performance are available to employees and external stakeholders via the following link: <https://servier.com/engagements/>

The indicators currently being collected and consolidated for the 2021-2022 fiscal year will be available in Q2 2023 on [servier.com](https://servier.com)

### 2. Action plans

Setting up action plans and complementary measures to prevent social and environmental risks is incorporated into the CSR strategy roll-out within the departments. A multidisciplinary group will be set up to monitor action plan implementation.

### 3. Implementation of legal obligations

In parallel, the working group will continue to implement the obligations of compliance with the Duty of Vigilance Act, in order to gradually cover the Group's activities that are not yet included in the Duty of Vigilance Risk Mapping.