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MANAGEMENT COMMITMENT

“The LFB Group’s mission is to develop, manufacture and market biological medicinal products biological medicinal products, for diseases that are always serious and often rare.

The LFB Group's ethical commitment is exemplified in the exercise of its responsibilities towards patients, health professionals, employees, partners, shareholders and society as a whole. LFB's Code of Conduct is a tool used to enforce and implement the LFB Group's ethical commitment. It is part of the conditions of employment for all employees of the LFB Group. The LFB Group requires strict observation of this code and does not tolerate any misconduct. As employees of the LFB Group, we must respect and nurture these corporate ethics and thus protect the group's reputation.

Thank you for your continued support and commitment to complying with the LFB Group Code of Conduct to better meet our mission as healthcare stakeholders, to achieve sustainable performance and strengthen our reputation.”

Denis Delval
President and CEO



THE LFB GROUP HAS ADOPTED THIS ANTI-BRIBERY CODE OF CONDUCT

In this Code of Conduct, the term LFB Group or LFB means Laboratoire Français du Fractionnement et des Biotechnologies [registered with the Evry Trade and Companies Register under number 180 036 147] and any company that, directly or indirectly, controls, is controlled by Laboratoire Français du Fractionnement et des Biotechnologies, or is under the joint control of at least one company of the LFB Group, through ownership of more than 50% of the voting rights or any other legal instrument.

Public healthcare stakeholder, LFB places the values of responsibility, integrity and transparency at the core of its activities. These values guide the daily actions of its officers, members of staff, and external contractor or casual employees, in order to treat patients who benefit from LFB's products.

This Code applies to all LFB officers, members of staff, and all external contractors or casual employees, i.e. any permanent employee (under any type of employment contract concluded with LFB), casual employee (any outsourced employment contract), and to external stakeholders (partners and third parties working for or with LFB, such as consultants, contractors, suppliers).

Probity, integrity and transparency must be shared and respected by all LFB officers, members of staff, and external contractor or casual employees and any person who would come to work with or for LFB.

LFB, its officers, members of staff, and external contractor or casual employees are committed to the fight against bribery and influence peddling.



This Code of Conduct serves to recall the rules and principles that, when applied, serve to prevent situations of bribery or influence peddling.

The professional conduct of all LFB officers, members of staff, and external contractors or casual employees must be truly ethical and perceived as such. Any act of bribery or influence peddling is prohibited.

This Code of Conduct serves to recall the rules and principles that, when applied, serve to prevent situations of bribery or influence peddling. It explains the rules and principles in this area and their implementation.

In general, to determine whether conduct is in accordance with this Code, consideration should be given as to whether the proposed act is lawful, and whether it is consistent with LFB's values.

The Compliance Department within the Group Legal Affairs and Compliance Department (DJCG), hereinafter LFB's "Compliance

Department", provides support with regard to the understanding, implementation and enforcement of the Code, and the implementation of reference procedures (see 2.1). Where any doubt exists, an email address is available to any LFB officer, member of staff, and external contractor or casual employee for queries (see 2.3).

FRAMEWORK AND SCOPE OF APPLICATION

The Anti-Bribery Code of Conduct applies to all LFB officers, staff, and external contractor or casual employees in all their activities in France and all other countries.

It addresses situations in which bribery issues may arise. This code also governs general concepts relating to professional ethics, such as conflicts of interest, accepting bribes, influence peddling.

Due to its international business, law and regulations on anti-bribery for a given country may be applicable to LFB, irrespective of whether it exercises its activity in said country. LFB must give special attention to its compliance with applicable anti-bribery laws in the US, UK and France.

If the anti-bribery laws and regulations in the countries in question are more rigorous than this Code, LFB will comply with the legal or regulatory

anti-bribery standards of said country and the values of this Code.

If the anti-bribery laws and regulations in the countries in question are more rigorous than this Code, the latter prevails given LFB's aim to apply the highest standards in the fight against bribery.

LFB officers, members of staff, and external contractor or casual employees must act in accordance with the anti-bribery principles and values of this code. Misconduct not only exposes LFB to liability, but also the person in question, individually.

This Code enters into force on 16 April 2018 and must be implemented by all LFB subsidiaries, taking into account local legal considerations.



PRINCIPLES

LFB group

Obtaining or retaining an advantage, of a financial or any other nature, that is not a normal or customary consideration in a business relationship is strictly prohibited.

This chapter details and illustrates the various types of behaviour that are prohibited as acts likely to be indicative of corruption, undue influence or a conflict of interests.

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1.1 ACTIVE AND PASSIVE BRIBERY

GENERAL RULES

Rule

LFB officers, members of staff, and external contractor or casual employees are prohibited from committing any act of bribery and especially using intermediaries (sales agents, distributors or business partner) for the purpose of committing such acts.

LFB will not tolerate any act of bribery by its officers, members of staff, external contractors or casual employees.

Definitions

Bribery means the gift, promise, demand, or acceptance by an LFB officer, a member of staff or an external or casual employee of any form of improper advantage for the purposes of obtaining an improper advantage for its benefit or that of its staff or that of LFB.

Bribery can involve individuals and legal entities in France and abroad.

It concerns both public persons (officials, public institutions, government, public agency or authority, etc.) and private individuals (suppliers, distributors, consultants, sales representatives, clients, health professionals, etc.).

Bribery is active when the person who has initiated it is an LFB officer, member of staff, external contractor or casual employee or a person acting on its behalf.

Bribery is passive when the LFB officer, member of staff, external contractor or casual employee benefits from any advantage from a third party in exchange for performing or refraining from performing an act relating to his duties.

Bribery can be offered directly or by an LFB officer, member of staff, external contractor or casual employee or indirectly, that is to say through one or more intermediate(s).

The objective of the bribery is to obtain or retain an advantage from current business relationships, that is to say, one that is not normal or typical in a business relationship.

Examples

PUBLIC ACTIVE BRIBERY

■ **payment of a sum of money** to members of a committee in charge of the economic evaluation of health products in order to obtain a better price.

PRIVATE ACTIVE BRIBERY

■ **payment of a commission to an officer, employee or partner** of a supplier so that the latter lower its prices.

PASSIVE BRIBERY

■ **payment to an LFB officer, member of staff, external contractor** or casual employee of an additional sum of money on top of the contract price, known as retro-commission, by a commercial agent in exchange for signing a contract or a higher commission.

RELATIONS WITH PUBLIC OFFICIALS AND HEALTH PROFESSIONALS

Rule

LFB makes no distinction between public officials and those in the private sector with regard to bribery. Nevertheless, public officials are often subject to laws and regulations that are different from those applicable to individuals within the private sector.

Similarly, specific rules may apply to health professionals that must be respected and implemented.



Any LFB officer, member of staff, external contractor or casual employee must strictly ensure that any relationship with a public official or a health professional complies with legislative and regulatory provisions governing it and which he/she is subject to and that any benefit provided to a public official or a health professional is fully transparent and justified.

Definitions

The term "public official" has a broad definition:

- ✓ any person of authority or person elected or appointed to a government (French or foreign) or ministry (French or foreign), government or administrative agency (French or foreign) or an entity owned entirely or in part, by a government (French or foreign);
- ✓ or any person of authority elected or appointed to a public international organization;
- ✓ any person holding a public service mission or acting formally on behalf of a government, a ministry, a government or administrative agency, an entity owned by a government (in whole or in part) or an international organization, in France or abroad;
- ✓ any person deemed, by law and/or regulations, as an official.

A health professional covers different concepts in different countries, but generally may be understood as any member of the medical

profession (doctors, midwives and dentists), pharmacy profession (pharmacists, pharmacy technicians, hospital pharmacy dispenser, medical physicists), medical auxiliary professions (nurses, physiotherapists, chiropodists, occupational therapists and psychomotor therapists, speech therapists and orthoptists radiologist assistant and medical laboratory technicians, audiologists, dispensing opticians, prosthetists and orthotists, dieticians, health aides, child care assistants and paramedics), or any other person who, in the exercise of his professional activities, may prescribe, distribute, supply, purchase, administer or recommend the use of an LFB product.

As described in this Code, health professionals include both individuals and legal entities, and health sector institutions (French Health Authority, ANSM, etc.).

For clarity, it should be noted that health professionals do not include physicians and other professionals employed by LFB entities.

When a health professional practices in a public health institution, university or a similar organization, he is considered as an official.

He must respect the rules applicable in each country relating to relationships with health professionals (anti-gifts law, transparency).



In France, relationships with healthcare professionals are particularly governed by the French Public Health Code (concerning the prohibition of benefits and transparency of tied interests - see specific legislation).

GIFTS, HOSPITALITY AND ENTERTAINMENT

Rule

Any LFB officer, member of staff, external contractor or casual employee who offers or proposes gifts, hospitality or entertainment must ensure that they remain authorized, reasonable and infrequent under the law or the relevant local procedures, according to the nature of their recipient.

Any LFB officer, member of staff, external contractor or casual employee must refrain from offering, proposing or giving gifts, providing hospitality and entertainment with the sole intention of leading the recipient thereof to do something or refrain from doing something for the benefit of LFB.

Any LFB officer, member of staff, external contractor or casual employee must refrain from offering gifts equivalent to cash (e.g. gift vouchers), providing entertainment to participants of any internal event promoting or marketing LFB products, or to their immediate relatives, if said entertainment is a disproportionate advantage over the object of the operation.

Any LFB officer, member of staff, external contractor or casual employee is prohibited from

receiving gifts or benefiting from a hospitality or entertainment from a third party if they are not for a reasonable value.

Gifts or entertainment related to the customs of the country where LFB exercises its activity, and the refusal of which could be deemed offensive, may be accepted but are reported to a direct superior who will decide on their future in connection with the company's management.

Following on from the rules for public officials and health professionals, offering or giving a gift or providing entertainment to a French health professional is forbidden. The hospitality afforded to a French health professional is always in connection with a business, promotional, scientific or medical meeting. Regarding foreign health professionals, local laws or reference procedures on gifts, hospitality and entertainment must be respected.

Definitions

Gifts are defined as any material benefit given with or without profit motivation.

Hospitality means the payment of meals, transport costs or accommodation of any third party outside LFB.

Entertainment is defined as any event and/or demonstration such as shows, concerts, sporting events, etc.

Examples

■ **Prohibition of inviting members of the tender committee to the European Cup Final.**

■ **Prohibition for a LFB buyer to receive a touchpad from a supplier.**

FACILITATION PAYMENTS

Rule

Any LFB officer, member of staff, external contractor or casual employee must abstain from making facilitation payments.

Definitions

Facilitation payments are payments made to officials with the intention of expediting or facilitating the normal course of business or performing an action.

Examples

■ **Ban on payment of money to a customs agent with the intention of obtaining a more rapid clearance.**

■ **Ban on payment of money to a health agency with the intention of expediting the processing of a marketing authorization application.**

DONATIONS, SPONSORSHIP AND SPONSORING

Rule

Any LFB officer, member of staff, external contractor or casual employee must refrain from offering a donation, sponsorship or sponsoring

when LFB is likely to receive an excessive and unjustified consideration, or a material benefit in return.

Definitions

Donation means benefits provided in the form of cash and/or contributions in kind (products for example) without any compensation for the donor and used to finance general activities of the recipient falling within the scope of its corporate purpose.

Sponsorship means a financial or material support given to a corporation for the exercise of its activities. Sponsorship covers a specific project or event organized by the legal entity and

is the subject of a contract. The counterpart for LFB must be very limited.

Sponsoring means any agreement with an organization or company by which said organization or company implements actions in return for payment, which will improve LFB's reputation or image. Sponsoring is similar to advertising designed to promote the LFB's image and achieve different forms of visibility for it.

Example

■ **Ban on sponsoring a sports association whose president is the director of the marketing authorization committee for medicinal products.**

LOBBYING

Rule

As part of its lobbying activities, any LFB officer, member of staff, external contractor or casual employee must refrain from any act of bribery

or any influence peddling and, in general, from any action that could have an undue influence on any decision affecting the activities of LFB.

Definitions

Lobbying is defined as a set of influential actions undertaken by a company or a group of persons, directed to politicians, public authorities or any other public decision-maker in order to enforce the view of the company or group in a decision-making process.

Lobbying is a legal activity, but its practice must not give rise to acts that are misused, contrary to probity.



Example

- No payment of money to a member of a government through a PR agency or other intermediary with the intention of having a regulation changed.

RELATIONS WITH THIRD PARTIES (SUPPLIERS, DISTRIBUTORS, SALES AGENTS)

Rule

Any LFB officer, member of staff, external contractor or casual employee must ensure, when the services of a third party are used, that the following conditions are met:

- ✓ a justified need of services or goods provided by third parties;
- ✓ the existence of a contract or other legal document;
- ✓ the reputation and commitment of the third party with regard to anti-bribery rules.



Particular care should be given to the selection of third parties when they are located in an area where the risk of bribery is high.

Definitions

Third party means any person or entity, and in particular any supplier, distributor or sales agent with whom LFB would have a relationship and

which would present, given the nature of the activities of this third party, a significant level of risk in terms of bribery.

Examples

- Ban on commercial agents paying a sum of money to an individual in charge of the opening of bids in a public tender with the intention of winning the tender.

- Ban on distributors paying a sum of money to the competent State authorities with the intention of securing the registration of products.

GROWTH OPERATIONS AND JOINT VENTURES

Rule

As part of a growth operation or creation of a joint venture, any LFB officer, member of staff, or external or casual employee in charge of such

operations must ensure with the "Compliance Department" that a bribery-related evaluation was conducted.



Particular care should be given to growth operations or joint-ventures when they are located in an area where the risk of bribery is high.

Definitions

A growth operation corresponds to the acquisition by LFB, of all or part of a business, or merger between an LFB business with another company.

A joint venture is an agreement between LFB and one or more companies or organizations, for the purposes of carrying out a project (e.g.

construction and operation of an industrial site), through a new structure in the common interest of LFB and the companies or organizations involved in the project.

1.2 INFLUENCE PEDDLING

Rule

No LFB officer, member of staff, external contractor or casual employee LFB may, directly or indirectly, by improper or unlawful means, ask

a person exercising a public function, to use his influence to obtain a favorable decision from a public authority or administration.

Definitions

Influence peddling means the act of a person exercising a public function soliciting or accepting, directly or indirectly, offers, promises, donations, gifts or benefits of any kind given for the purpose of using his influence in order to obtain from a public authority or administration, awards, distinctions, procurement contract, employment or other favorable decision.

the credence he holds as a result of the duties, friendships or working relationships that he would have created with other public officials.

A person exercising a public function may be a person holding public authority, discharging a public service mission or holding an elected public office.

Influence peddling is thus, for a person exercising a public function, the act of using or abusing

The influence must be exerted with an authority or public administration.



Influence peddling is active when a person solicits an individual exercising a public function by offering an advantage for the latter in exchange for use his influence in his favor.

Influence is passive when the person exercising a public function accepts this advantage in exchange for using or abusing his influence.

Exemple

■ Ban on offering an elected official an advantage to intervene with an administration charged with issuing or refusing an authorization.

1.3 CONFLICT OF INTEREST

Rule

Any LFB officer, member of staff, external contractor or casual employee must avoid placing himself or LFB in a situation of conflict of interest that could negatively impact LFB's image or reputation.

LFB must ensure that any party with whom it has entered into a business relationship in order to act on behalf of the former involves no interest in conflict with those of LFB.

Definitions

Conflict of interest is any situation in which any LFB officer, member of staff, external contractor or casual employee has a sufficient degree of private or personal interest to be influenced in the objective exercise of his functions.

or persons connected thereto (individuals or legal entities).

Personal interests are likely to be of material interests, financial interests, family interests or moral interests.

Conflict of interest give rise to a risk of interference between the private and/or personal interests of the LFB officer, member of staff, external contractor or casual employee and those of LFB.

Personal interest must be understood in broad terms, such that it covers both the interests of the LFB officer, member of staff, external contractor or casual employee, that of his family



Similarly, there may be conflict of interest when LFB uses third parties (individuals or legal entities) that put them in a situation where there is a competition between their personal interest and their mission, their function or their usual position.

Exemples

■ **Awarding a supply contract to a company owned by the spouse of an LFB officer, member of staff, external contractor or casual employee.**

■ **Involvement by an LFB officer, member of staff, external contractor or casual employee in the recruitment process of a relative whose previous duties place him in a situation of conflict of interest.**

However, a relative may be co-opted when he applies for a position with LFB.

■ **Entering into a contract with a health professional in a public service so that he, in the scope of his duties, renders decisions on LFB's activity, and does not disclose this fact in his Public Declaration of Interests.**

2

IMPLEMENTATION

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LFB Group

The anti-bribery Code sets out the key principles for avoiding any situation involving corruption, undue influence or conflict of interests.

LFB directors, members of staff, external employees and temporary workers must abide by these principles and apply the current reference procedures.

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2.1 REFERENCES

This Code presents principles to prevent any situation of bribery, influence peddling and conflict of interest as well as their implementation within LFB.

In this respect, LFB shall issue reference procedures whose compliance is mandatory for LFB officers, members of staff, external contractors or casual employees and breaches of which will be subject to disciplinary action. These procedures serve to recall specific rules,

for example, the rules for relationships with health professionals or defining authorized and reasonable amounts (e.g. the reasonable value of a gift).

LFB's "*Compliance Department*", provides support with regard to the understanding, implementation and enforcement of the Code, and the implementation of reference procedures.

2.2 DISCIPLINARY ACTIONS

This Code applies to all LFB officers and employees i.e. any permanent employee (under any employment contract type concluded with LFB), casual employee (any outsourced employment contract), and to all partners and third parties working for or with LFB (consultants, service providers, suppliers).

Any violation of this Code, LFB policies, or anti-bribery laws and regulations in the countries in which LFB operates, will likely give rise to disciplinary measures. These disciplinary

measures may even include dismissal, in accordance with local labor law and procedures adopted locally via the Rules of Procedure.

For external contractors or casual employees, disciplinary issues will be addressed to their employer.

Any violation of this Code, LFB policies, or anti-bribery laws and regulations in the countries in which LFB operates, will likely lead to questioning of the relationship that LFB has with the partners and third parties concerned (consultants, contractors, suppliers).



Any violation of this Code, LFB policies, or anti-bribery laws and regulations [...] will likely give rise to disciplinary measures.



This Anti-Bribery Code of Conduct is annexed to the Rules of Procedure of Ulis, Ales and Lille in France.

2.3 WHISTLEBLOWING

Any questions relating to this Code, LFB policies or laws and anti-bribery regulations applicable in the countries in which LFB operates, may be directed to your manager, a legal officer within LFB, or LFB's "*Compliance Department*" at [info-compliance@lfb.fr].

In addition, a whistleblowing system allows any LFB officer, member of staff, external contractor or casual employee to report, confidentially if

necessary, any conduct contrary to the provisions of this Code, LFB policies or anti-bribery laws and regulations applicable in every country in which LFB operates [see *whistleblowing procedure GC03* and the following address: alert-compliance@lfb.fr].

LFB's "*Compliance Department*" will respond to the alert within a reasonable time. Any alert will be treated confidentially.

2.4 RESPONSIBILITY

The ethical principles and values of this Code must be read, understood and respected by all. The officers of each entity, the directors of each department and site managers must ensure to implement and enforce compliance with this anti-bribery code of conduct by their teams.

LFB's "*Compliance Department*" is available to explain these principles and anti-bribery values and to enforce them.

CONTACTS

Group Legal Affairs and Compliance Department

Telephone : +33 (0) 1 69 82 73 47

E-mail : info-compliance@lfb.fr

The LFB Group on social networks



http://www.twitter.com/Groupe_LFB



<http://www.linkedin.com/company/lfb>



<http://www.youtube.com/user/SocieteLFB>

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<p>RT</p> <p>RELATIONSHIPS WITH THIRD PARTIES</p>	<p>DS</p> <p>DONATIONS, SPONSORSHIPS AND SPONSORING</p>	<p>PC</p> <p>PASSIVE CORRUPTION</p>	<p>LO</p> <p>LOBBYING</p>