

GALDERMA

EST. 1981

Supplier Code of Conduct

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SCOPE

With our ambition to become the undisputed dermatology powerhouse, Galderma is committed to meeting individual consumer and patient needs with superior outcomes in partnership with healthcare professionals. Implicit to our ambition are commitments, laid out in [Galderma Code of Ethics](#), to comply with all applicable laws and regulations, to uphold robust labor practices throughout all our operations, to develop and distribute high-quality and safe products or to undertake ethical research, innovation and promotion. We expect similar behaviors from all parties that we work with.

Galderma (including all subsidiaries, collectively '**Galderma**') expects all partners, contractors or suppliers (collectively '**Suppliers**') that we work with to adhere to the set of

principles outlined in this Supplier Code of Conduct ('**Code**'). In this Code, Suppliers' workers ('**Workers**') include all employees with a fixed term or temporary contract as well as all employees not directly employed by the Supplier (e.g., contract workers, freelancers). Further, Galderma expects Suppliers to require their own partners, contractors or suppliers to uphold an equivalent set of principles.

This Code is regularly reviewed and potentially modified to reflect the latest standards Galderma requires from its Suppliers. Any provision that is not relevant, proportionate or applicable to the specific work undertaken with a Supplier will not be applicable to that Supplier. Upon signature, the Code will apply to all business relations between the Supplier and Galderma.

GUIDING PRINCIPLE

Galderma requires Suppliers to comply with all applicable laws and regulations.

In addition to this guiding principle, Galderma draws on internationally recognized standards to develop the Code's detailed set of principles. These include but are not limited to the Universal Declaration of Human Rights, the International Labor Organization Core Conventions, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

Note that if domestic laws and regulations conflict with principles laid out in the Code, Suppliers shall adhere to the higher standard without contravening to applicable laws and regulations.

DETAILED PRINCIPLES

Product quality & safety

Galderma requires Suppliers to manufacture/ develop raw materials, packaging components, products (including finished products) or services in compliance with applicable laws, regulations, regulatory standards (e.g., health authorities), industry guidance and/or any additional requirements. When applicable, Suppliers shall follow Good Manufacturing Practices ('GMP') or equivalent expectations and requirements.

Sustainable products & production

Galderma requires Suppliers to comply with all applicable environmental laws and regulations. Galderma also encourages Suppliers to selectively go beyond applicable laws and regulations across their value chains, this includes:

- Tracking and publicly reporting Scope 1, 2 & 3 emissions (including performing Life Cycle Assessments when relevant)
- Implementing initiatives to reduce their Scope 1, 2 & 3 emissions footprint
- Tracking water withdrawal and discharge and implementing initiatives to minimize water consumption
- Tracking energy consumption and implementing energy efficiency initiatives
- Tracking waste generation and implementing initiatives to minimize waste generation and improve waste treatment
- Minimizing negative impacts on biodiversity and ecosystems, including through reducing resource inflows

DETAILED PRINCIPLES

Labor practices

Galderma seeks to align its practices with internationally recognized human rights standards and requires Suppliers to strive to do the same across their value chains.

Working conditions

Suppliers must treat all Workers with respect and dignity. This includes prohibiting discrimination in hiring and employment practices (including promotion and performance management) on the grounds of race, color, religion, sex, age, physical ability, national origin, or any other legally prohibited grounds and actively preventing any form of violence and/or harassment (i.e., direct, indirect, physical or verbal).

Suppliers must adhere to applicable laws, regulations and binding collective agreements pertaining to working hours (incl. maximum working hours, overtime, breaks, rest time and holidays), wages (incl. minimum living wages) and benefits (incl. social benefits).

Suppliers must recognize and respect the right of all employees to freedom of association and collective bargaining, in accordance with the applicable laws and regulations of each country in which Suppliers operate.

Suppliers shall implement appropriate grievance procedures that allow Workers to report incidents, misconducts or raise concerns confidentially and without fear of retaliation.

Forced labor

Suppliers must under no circumstances use, or rely in any way on, any form of modern slavery and human trafficking including the use of prison, bonded, indentured or other forms of forced labor.

Child labor

Suppliers must under no circumstances use or rely in any way on child labor as defined in International Labor Organization Core Conventions 138 and 182. Further, Suppliers must establish processes or procedures to ensure strict adherence to this principle.

Health and safety

Suppliers need to guarantee healthy and safe working conditions. This encompasses deploying a fit-for-purpose health and safety program, aligned with industry standards, providing an adequate workplace, constructed and maintained in accordance with relevant standards, including potable drinking water, sanitation and essential safety equipment.

DETAILED PRINCIPLES

Business ethics & corporate governance

Galderma strives for the highest standards and integrity, with well-defined governance which guides how our company and employees conduct business and expects Suppliers to do the same.

Anti-bribery and anti-corruption

Suppliers must comply with all applicable anti-bribery and anti-corruption laws and regulations, across all jurisdictions where they work for or on behalf of Galderma.

Suppliers must never engage in bribery, which is the offering, promising, giving, accepting or soliciting of an improper benefit with the intention of influencing the behavior of someone to obtain or retain a commercial advantage. Bribes do not have to involve money. Anything of value can constitute a bribe if it is intended to obtain an improper benefit or to induce the recipient to violate a duty of loyalty to their employer. Bribes can include, but are not limited to, gifts, meals, entertainment, free product samples, donations to a favored charity, loans, travel expenses, and job offers or placements.

Free competition

Suppliers shall comply with free competition principles, laws and regulations, including but not limited to antitrust, competition and fair trading laws.

Conflict of interest

Suppliers must avoid situations that present or create a potential, perceived or actual conflict between the Supplier's interest(s) and those of Galderma.

Responsible sourcing

Suppliers shall put in place adequate due diligence mechanisms to monitor and enforce adherence to the principles laid out in this Code in their own value chain, specifically related to child or forced labor.

Animal testing

When in-vivo/ex-vivo research activities are required by regulatory authorities, Suppliers must strictly adhere to animal welfare laws and regulations. Further, the use of animals must comply with the principles of the 3Rs framework (i.e., Replace, Reduce, Refine).

Data protection and privacy

Suppliers must implement and maintain appropriate measures to protect and handle sensitive information in accordance with applicable data protection and privacy laws and regulations. This includes but is not limited to all personal information related to Suppliers' or Galderma's Workers.

Monitoring

Galderma monitors, through a dedicated responsible sourcing initiative, adherence with the principles laid out in this Code. Audits are typically carried out through third parties in a structured, non-disruptive manner, either on-site (e.g., via inspection by certification companies) or online (e.g., via a third-party assessment platform). If a Supplier does not pass an audit, a corrective action plan is put in place with appropriate follow-ups. Galderma reserves the right to terminate an agreement with any Supplier which does not comply.

DETAILED PRINCIPLES

Reporting

Galderma requires Suppliers to report any violation of principles stated in this Code. Further, our [Galderma Speak Up Platform](#) is available to any Suppliers or Workers to report any violations in a confidential, anonymous manner in any language. Galderma does not tolerate any retaliation against violation reports made in good faith.

Equivalence

Galderma recognizes that some Suppliers may have equivalent code of conduct, policy or procedure in place that meets or exceeds the principles laid out in this Code. In such cases, it is the Suppliers' obligation to confirm equivalence with this Code. Galderma reserves the right to verify the equivalency status through requesting clarification on specific points outlined in this Code and potentially object. Any false or misleading equivalency declaration may result in the revocation of equivalency status and the termination of the contractual relations.

ACKNOWLEDGEMENT OF TERMS

On behalf of Supplier

Company

Company registered address

Street

City (incl. ZIP)

Country

Acceptance of the code

Directly

By equivalence (please attach the equivalent code of conduct, policy or procedure)

Place and date

Signature

Authorised signatory name

Signature
