

# GALDERMA

EST. 1981

## GLOBAL CODE ON INTERACTIONS WITH HEALTHCARE PROFESSIONALS

December 2019


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# GALDERMA

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## Our Purpose



Advancing dermatology  
for every skin story

### 1. About this code

This Code sets forth the principles and policies that Galderma follows when promoting products and interacting with Healthcare Professionals (“HCPs”). Its provisions apply to both *promotional* and *non-promotional* activities and interactions with HCPs.



## 2. Scope



This Code applies globally to all employees of Galderma (collectively referred to as “Galderma Employees”) and to all Galderma functions and businesses (regardless of whether operating under a “Galderma” or other name) including, but not limited to, all Galderma affiliates, global business units (“GBUs”), functions and businesses, manufacturing sites, home office divisions, and research/development groups.

This Code contains the minimum global standards that all employees must follow. This means that where Applicable Laws and Codes or an approved local policy contain provisions that are stricter than those of this Code, the most stringent standard will always apply even if such standard is not specifically mentioned in this Code. Consistent with the *Galderma Code of Ethics*, Galderma is committed to upholding the highest ethics in all its interactions with HCPs and insists on full compliance with this Code and Applicable Laws and Codes by Galderma Employees.

Galderma’s external partners and authorized representatives are also expected to fully comply with all Applicable Laws and Codes and to this Code (or to principles substantially similar to this Code) when engaged in promotional and non-promotional activities and interactions with HCPs on behalf of Galderma.

Such partners and representatives include clinical research organizations, third party distributors of Galderma products, and other service providers, subcontractors and agents. Galderma Employees who oversee external partners and authorized representatives must never ask them to take actions prohibited by this Code, and must ensure that they are familiar with the relevant requirements of this Code.

Legal Affairs (including the HCP Compliance team within Legal Affairs) is responsible for providing guidance on the interpretation of this Code.

### 3. Responsibility

All Galderma Employees engaged in or supporting promotional and non-promotional activities and interactions with HCPs are responsible for reading, understanding, and complying with this Code.

Heads of GBUs, Heads of Global Functions, Heads of Zones and Country/General Managers (“Business Leaders”) are responsible for ensuring compliance with this Code by Galderma Employees under their management.



## 4. Definitions

**"Applicable Laws and Codes"** – any regional, national or international law, regulation or code (including mandatory codes of practice and those by which Galderma has voluntarily agreed to be bound) that applies to the promotion of Galderma Products, or to Galderma interactions with HCPs.

**"Healthcare Professional" or "HCP"** – any member of the medical, dental, pharmacy or nursing professions or any other person or entity who in the course of his, her or its professional activities may prescribe, recommend, purchase, supply or administer a Galderma Product. As used in this Code, HCP includes natural persons, as well as legal entities such as companies, partnerships, and healthcare institutions. For clarity, HCP does not include Healthcare Professionals who are employees of Galderma.

**"Galderma"** – Galderma refers to all businesses operating as part of Galderma whether operating under a "Galderma" or other name, including, but not limited to, all Galderma affiliates, GBUs, functions and businesses, manufacturing sites, home office divisions, and research/development groups.

**"Galderma Technical Personnel"** – Galderma Employees whose primary responsibility or job function is directly related to their medical or technical expertise and training. This includes all personnel in the research and development, medical affairs, and regulatory affairs functional groups. For clarity, Galderma Technical Personnel does not include Galderma Employees who have medical or technical expertise and training, but whose primary responsibility or job function is directly related to the sale or marketing of Galderma Products.

**"Product"** – refers to any medicinal product, medical device, cosmetic, food supplement or consumer product or article that is developed, marketed, or distributed by or on behalf of Galderma.

**"Promotion"** – refers to any interaction during which an Galderma Employee discusses a Product or makes any claim regarding any attribute of a Product in a way that is intended to induce or could be viewed by a reasonable person as intended to induce an HCP or consumer to prescribe, dispense, supply, purchase, administer, recommend, or use a Product. For clarity, Promotion does not include the following non-promotional activities:

- Sponsoring HCPs to travel and attend independent medical congresses and symposia;
- Interacting with HCPs while such HCPs are providing consulting or other non-promotional services to Galderma pursuant to a written agreement;
- Engaging in market research with HCPs, patients, or consumers;
- Conducting clinical studies and other research activities;
- Publication and dissemination of scientific data by Galderma Technical Personnel;
- Responses by Medical Affairs personnel to unsolicited questions about the use of Galderma Products; and
- Providing grants to health-care institutions, organizations, and associations.



## 5. Basic principles

The promotion of Galderma Products and all Galderma interactions with HCPs must comply with Applicable Laws and Codes. In addition, the following basic principles govern all Galderma promotional activities and interactions with HCPs:

### 5.1 Principle of Independent Medical Judgment

The ultimate purpose of interactions with HCPs is to enhance patient care and the practice of medicine. Galderma's interactions with HCPs must be consistent with the duties that HCPs have to their patients and customers. These interactions must at all times be ethical, appropriate, and professional.

Nothing may be offered or provided to an HCP as an inducement or reward for prescribing, dispensing, supplying, purchasing, administering, recommending or using a Galderma product.

### 5.2 Principle of Truthful Promotion of Products

Promotion of Galderma Products must always be truthful and not misleading, based on adequate substantiation, and consistent with the scope of all relevant market authorizations.

### 5.3 Principle of Separation of Promotional and Non-Promotional Activities

Interactions which have the objective of promoting Products must be openly considered as such and not disguised. When promoting Products, the efforts of Galderma Employees should focus on informing HCPs about our Products, providing scientific and educational information, and supporting medical education.

Promotional materials should clearly disclose that they are created or distributed by Galderma. Activities intended to gather scientific input or generate data – such as advisory boards, clinical studies and market research – must not have the promotion of Products as their purpose.

### 5.4 Principle of Transparency

Galderma recognizes that in many countries, Applicable Laws and Codes may require detailed disclosures of payments or other transfers of value to HCPs covering such things as educational sponsorships, consulting agreements, travel, hospitality and meals. Galderma seeks to comply with such requirements and to maintain respect for privacy and contract rights in connection with these disclosures.



## 6. Prohibition of improper incentives

Galderma Employees must not attempt to use things of value, such as free items, payments, expensive meals, or other types of incentives to influence the prescribing, dispensing, supplying, purchasing, administering, recommendation, or use of a Galderma Product, or to help Galderma gain any other improper advantage. In fact, Applicable Laws and Codes in many countries prohibit the offering of improper incentives in connection with the practice of medicine. The overriding concern of these Applicable Laws and Codes is to ensure that HCPs remain focused on promoting the best interests of patients. The HCP's decision to prescribe or recommend a particular medicine, medical device or consumer product must be based, first and foremost, on an evaluation of the available medical science.

Offering or providing entertainment to HCPs is strictly forbidden. For example, Galderma Employees may not pay or reimburse for sightseeing tours, golfing, spa fees, or tickets to concerts or sporting events. In addition, Galderma Employees may not use personal funds to provide entertainment to HCPs even if reimbursement is not sought.

However, Galderma may, in accordance with Applicable Laws and Codes, provide: (i) discounts, allowances, or rebates (excluding cash rebates) to HCPs pursuant to an arm's length transaction for the sale of Galderma Products; and (ii) certain types of gifts, meals, accommodation, and travel to HCPs as described below.

### 6.1 Gifts

Where permitted by Applicable Laws and Codes, Galderma may provide cultural courtesy gifts, promotional reminders, and educational items (collectively, "Gifts") to HCPs. All permitted Gifts must be modest in value, reasonable and given infrequently so far as any individual recipient is concerned and within limits set by local procedures and line management. In addition, all Gifts must be of a nature that would not embarrass Galderma if the Gift were to be publicly disclosed.

All Gifts must be clearly from Galderma and not a Gift from an individual Galderma Employee. Galderma Employees may not use personal funds to purchase Gifts for HCPs on behalf of Galderma. The use of personal funds to provide Gifts to HCPs even when reimbursement is not sought does not exclude a Galderma Employee from complying with this provision.

Galderma Employees may not provide any other kinds of gifts or benefits in kind (including personal gifts) to HCPs. In particular, gifts of cash or cash equivalents (e.g., gift certificates) must never be given to a HCP.

Gifts must never be conditioned on, nor offered as an inducement or reward for, prescribing, dispensing, supplying, purchasing, administering, recommending, or using a Galderma Product, or to help Galderma gain any other improper advantage.

#### 6.1.1 Cultural Courtesy Gifts

Where permitted by Applicable laws and Codes, and on an exceptional basis, Galderma Employees may give inexpensive cultural courtesy gifts to HCPs only in acknowledgment of a significant national, cultural, or religious event. Cultural courtesy gifts can only be given in limited cases where the omission of providing a small gift for a specific occasion would be deemed inappropriate and a cultural offense. Cultural courtesy gifts may only be given to HCPs in countries where: (i) this practice is a social norm; (ii) such gifts are permitted by Applicable Laws and Codes; and (iii) this practice has been authorized in accordance with a local documented procedure.



The value of cultural courtesy gifts must be inexpensive as judged by local standards. In countries, where cultural courtesy gifts are appropriate, the local business unit must establish a monetary limit for such gifts using local currency.

### 6.1.2 Promotional Reminders

Where permitted by Applicable laws and Codes, Galderma Employees may give inexpensive promotional reminder aids to HCPs that are intended to promote Galderma or Galderma Products and that are relevant to the HCP's practice or professional responsibilities. Promotional reminder aids may include pens, notepads and other stationery items, and inexpensive clinical items, such as hand sanitizers, wipes or surgical gloves. Items that are for the personal benefit of healthcare professionals or items that may reasonably be expected to be used outside the scope of the healthcare professional's practice or professional responsibilities, such as music CDs, thermos flasks or umbrellas, may not be given as promotional aids.

The use of actual brand names on these items is appropriate when permitted under Applicable Laws and Codes and approved by the applicable Galderma Technical Personnel responsible for approving promotional materials.

### 6.1.3 Educational Items

Where permitted by Applicable laws and Codes, Galderma Employees may give educational items to HCPs that are intended for the education of healthcare professionals or patients, such as textbooks, anatomical posters and models, and patient education materials. Educational items must not have a value to a HCP outside the scope of his or her professional practice. For example, it is not permissible to provide iPads loaded with educational material.

Any informational content in educational items relating to a Galderma Product must be fair, balanced, truthful and not misleading, based on adequate substantiation, consistent with the Product's marketing authorization and approved by Galderma Technical Personnel in the local market prior to dissemination of such items.

## 6.2 Meals, Accommodations and Travel

Where not prohibited under Applicable Laws and Codes, modest meals and in some cases, travel expenses, may be provided to HCPs to facilitate promotional and non-promotional interactions.

### 6.2.1 Meals

Where not prohibited by Applicable Laws and Codes, modest meals may be provided by Galderma to HCPs in connection with Product discussions or at meetings where business-related, medical or educational topics are discussed. These meals should be conducted in the HCP's office or in a location that is conducive to discussion. The permissible value and other requirements related to the provision of meals

to HCPs is set in local procedures approved by local line management.

Galderma may only pay for meals for HCPs who are providing services to Galderma or who have a bona-fide reason to participate in the Galderma presentation or activity. Accordingly, Galderma Employees may not arrange or pay for spouses or other guests of a HCP unless such spouse or guest independently qualifies to attend the presentation or activity.



### 6.2.2 Hotel Accommodations and Travel

Where not prohibited by Applicable Laws and Codes, Galderma may pay for HCP travel related expenses relating to (i) Product evaluation, education, or training activities to facilitate the safe and effective use of a Galderma Product such as “hands on” sessions, cadaver workshops, lectures and presentations; (ii) sponsorships to attend an independent medical congress or symposium; or (iii) the provision of services to Galderma. Galderma Employees may not make travel arrangements or pay for travel-related expenses for spouses or other guests of a HCP.

Hotel accommodation and travel provided by Galderma should be reasonable in value and conducive to the underlying legitimate purpose of the activity. In particular, the type and class of airline and hotel service should be consistent with Applicable Laws and Codes. For example, air travel for HCPs generally should be limited to coach class, but business class travel may be appropriate for long haul flights. Galderma must consider at all times the image and the perception that may be projected to the public by their choice of location.

Under no circumstances may cash be given to an HCP with the understanding that the HCP will arrange his or her own travel or as reimbursement to an HCP for travel-related expenses.

## 7. Galderma meetings and hospitality; sponsoring HCPs to attend medical congresses

### 7.1 Galderma Meetings

Galderma may organize events, including scientific and professional congresses and meetings, and events held for the promotion of, or training of HCPs on Galderma Products.

All events organized by Galderma must be held at an appropriate venue that is conducive to the main purpose of the event.

Locations for Galderma meetings should be chosen on the basis of cost to Galderma and convenience of travel for HCP attendees. Galderma meetings should generally take place in the country where the majority of HCP attendees have their professional practice unless it is appropriate and justified to sponsor the event in a different country for logistical or security purposes or because the event relates to a relevant resource or expertise in that country. Galderma meetings in conjunction with international medical congresses and symposia are therefore justified and permitted.

Galderma meetings should not take place in extravagant or resort destination venues, unless it is appropriate and justified due to cost, availability, logistical or security purposes and such venue complies with Applicable Laws and Codes. As a guiding principle, Galderma meetings should only be held in locations and venues that would not embarrass Galderma if the location and venue of the meeting were publicly disclosed.

Unless prohibited by Applicable Laws and Codes, Galderma may provide modest meals, refreshments and hospitality in connection with Galderma-sponsored meetings. All forms of hospitality offered to HCPs must be measured, reasonable and secondary to the main purpose of the meeting, congress or event. The value of any meals or hospitality provided must comply with any limits imposed by Applicable Laws and Codes and must not exceed what attendees would normally be prepared to pay for themselves.

## 7.2 Sponsoring HCPs to Attend Independent Medical Congresses and Symposia



Where permitted by Applicable Laws and Codes, corporate sponsorships allowing HCPs to attend independent medical congresses and symposia that provide continuing medical education is an important contributor to medical education. These events help HCPs receive the latest and most accurate information that is critical for the improvement of patient care.

Accordingly, where permitted by Applicable Laws and Codes, Galderma may sponsor HCPs to attend independent medical congresses and symposia if: (i) the topics to be covered at the event are directly related to the scope of the sponsored HCP's practice and (ii) the primary purpose of the sponsorship is to expand the HCP's medical or scientific knowledge. Such sponsorships should be properly documented and approved in accordance with local procedures.

Such sponsorships shall be limited to payment or reimbursement of reasonable travel, meal and accommodation expenses and genuine registration fees.

Sponsorships must never be provided or offered as an inducement or reward for prescribing, dispensing, supplying, purchasing, administering, recommending, or using a Galderma Product or to help Galderma gain any other improper advantage.

## 8. Engaging HCPs to provide services

Galderma may retain and pay HCPs for legitimate promotional and non-promotional services such as giving promotional presentations on Galderma's behalf, providing training on Galderma Products, participation in the conduct of medical or scientific studies, and participating in consulting meetings, advisory boards, or market research.

### 8.1 Legitimate Need

A legitimate need for the services of a HCP must be clearly identified in advance of commencing the services or entering into contractual arrangements for the services.

The number of HCPs retained must not be greater than reasonably needed to achieve the identified need.

### 8.2 Criteria for Selection

Galderma may only obtain services from HCPs who have the medical expertise, skill, or training necessary for the requested service.

The decision to retain a HCP must never be influenced by a desire to encourage the HCP to prescribe, dispense, supply, purchase, administer, recommend, or use a Galderma Product or to help Galderma gain any other improper advantage.

### 8.3 Payment Must Be Consistent with Fair Market Value

The compensation for the services of a HCP must be reasonable, and must be consistent with the fair market value of the services provided. In addition, Galderma may pay for a HCP's reasonable travel-related expenses incurred in connection with providing services to Galderma.

### 8.4 Written Agreement

The engagement of a HCP must be confirmed in a written agreement signed by both parties before commencing any services. The agreement must clearly identify the reason for retaining the HCP, the tasks and responsibilities contemplated, and the agreed upon fair market value compensation for the services.



## 9. Grants and charitable contributions

### 9.1 Grants

Grants can serve an important function in helping fund research, education and professional development.

Galderma may make grants (in payment or in kind) to recognized medical associations, societies, institutions, hospitals, foundations, academies, and other related healthcare organizations that provide healthcare or conduct research or educational activities. Grants (excluding grants for Investigator Initiated Trials) may not be paid directly to individual HCPs or a private group of HCPs even if such grant is for research being conducted by an individual HCP.

Grants must be controlled by the recipient. Galderma must not, directly or indirectly, engage in any activities that are intended to bias or influence the content or activity funded by the grant.

#### Requests for grants must be:

- unsolicited;
- in writing and provide a detailed description of the activities requiring funding, including timing and budget, and any other appropriate information required for relevant accounting and records requirements; and
- submitted on behalf of an institution, organization or association (not from an individual HCP or private group of HCPs).

Grants are allowed if: (i) they are made for the purpose of supporting healthcare, independent continuing professional education, or research; (ii) they are free of influence by Galderma; (iii) they are documented and kept on record by the grantor; and (iv) they are not conditioned on, nor offered as an inducement or reward for prescribing, dispensing, supplying, purchasing, administering, recommending, or using a Galderma Product, or to help Galderma gain any other improper advantage.

### 9.2 Charitable Contributions



Galderma may make charitable contributions, monetary or in-kind, to support a bona fide charitable event or cause with an affinity to Galderma's missions in the field of healthcare or to support initiatives in communities where Galderma has a physical presence.

Unless otherwise approved pursuant to local policies or procedures, the only permitted recipients for charitable donations are registered tax-exempt community charities, health organizations, schools, medical clinics and other healthcare-related organizations. Charitable donations may not be given to individual HCPs or private groups of HCPs.

A charitable donation must not be conditioned on, nor offered as an inducement or reward for prescribing, dispensing, supplying, purchasing, administering, recommending, or using a Galderma Product, or to help Galderma gain any other improper advantage.

## 10. Promotional materials and activities

### 10.1 Promotional Materials – Truthful and not misleading

Promotional materials for a Product must be accurate, balanced, fair and objective to enable the HCP to form his or her own opinion of the therapeutic, corrective or cosmetic value of the Product concerned. Promotional materials should be based on an up-to-date evaluation of all relevant evidence and reflect that evidence clearly. Promotional materials must not mislead by distortion, exaggeration, undue emphasis, omission or in any other way.

### 10.2 Promotional Materials Must be Consistent with Marketing Authorizations

All promotional materials must be consistent with the scope of all relevant marketing authorizations. All promotional materials must also be reviewed and approved prior to local use by Galderma Technical Personnel in the local market to ensure compliance with local regulations and the applicable marketing authorizations.

Promotional materials for a Galderma Product must be updated promptly following any change to the scope of the marketing authorization for that Product.

### 10.3 Promotion of Galderma Products

Galderma Products may not be promoted for unapproved uses or indications. Promotion must be consistent with the particulars listed in the approved marketing authorization and/or labelling documents (packaging) of the relevant Product.

A Galderma Product may not be promoted prior to the receipt of any required marketing authorization, unless pre-approval promotion is expressly permitted by Applicable Laws and Codes. Such pre-approval promotion requires approval by Regulatory Affairs and Legal Affairs.

In addition to the requirements mentioned above, all Products must only be promoted using messaging and information approved by Galderma Technical Personnel in accordance with the procedures for approving promotional materials.

## 11. Samples

Where permitted by Applicable Laws and Codes, Galderma may provide samples of Products to HCPs at no charge. Samples are intended only for the benefit of patients, or to allow patients and/or HCPs to evaluate or familiarize themselves with the Product.

Samples may only be provided to a particular HCP in amounts reasonably necessary to support patient care, or to permit the HCP adequately to evaluate the product for future use. Galderma Employees shall comply with any limits on the size and number of samples for each HCP imposed by Applicable Laws and Codes for the type of Product.

Where required by Applicable Laws and Codes, free samples provided to HCPs must be labelled as free and not for resale.

The provision of samples must never be conditioned on, nor offered as an inducement or reward for, prescribing, dispensing, supplying, purchasing, administering, recommending, or using a Galderma Product, or to help Galderma gain any other improper advantage.



## 12. Non-promotional interactions with healthcare professionals

### 12.1 Market Research

Market research may never be conducted with HCPs for the purposes of Promotion. For example, it is not appropriate to conduct market research for the purpose of communicating messages that are inconsistent with the scope of the relevant marketing authorization. However, it would be permissible to conduct market research on an unapproved product or unapproved indication in anticipation of receiving marketing authorization from a regulatory authority, or to inform product development activities.

HCPs who participate in market research are providing services to Galderma and therefore may be subject to the requirements in this Code applicable to engaging HCPs to provide services. Before engaging in market research with HCPs, Galderma Employees should consult with their local Legal Affairs and/or HCP Compliance representative.

### 12.2 Clinical and Non-Clinical Studies

Clinical and non-clinical studies (i.e., studies other than market research) that are sponsored by Galderma must be approved and overseen by appropriate Galderma Technical Personnel.

Clinical and non-clinical research studies must be conducted with the objective of answering meaningful medical or scientific questions.

HCPs who serve as investigators in Galderma-sponsored studies are providing services to Galderma and therefore are subject to requirements in this Code applicable to engaging HCPs to provide services. Consistent with these requirements, Galderma Technical Personnel must oversee the selection of all investigators, the number of investigators chosen must be

consistent with the legitimate need for the study, and all payments to investigators must be consistent with the fair market value associated with the work performed by the investigator in the conduct of the study. In addition, selection of a HCP must never be offered as an inducement or reward for, prescribing, dispensing, supplying, purchasing, administering, recommending, or using a Galderma Product, or to help Galderma gain any other improper advantage.

### 12.3 Responding to Unsolicited Inquiries for Information on Galderma Products

Galderma Medical Affairs personnel may provide truthful, non-misleading information that is outside the scope of a relevant marketing authorization for a Galderma Product to a HCP in response to an unsolicited request for such information. The information provided must be narrowly tailored to respond to the HCP's unsolicited request for information.

Galderma Employees who provide such responses must maintain records of all written responses to such unsolicited requests.



## 13. Additional standards for aesthetics business

### 13.1 Aesthetic Product Training

Galderma has a responsibility to make education and training on Galderma's aesthetics products ("Aesthetics Products") available to HCPs, and Galderma fulfills this obligation through a variety of educational programs, including specialized clinical training.

Galderma recognizes the valuable role that experienced HCPs can play in providing specialized training, knowledge, and expertise and engages HCPs to help train other HCPs concerning appropriate patient care and the safe and effective use of Aesthetics Products ("HCP Trainers").

HCP Trainers who provide product training to other HCPs must be competent and qualified to provide instruction on the particular Aesthetic Product that is the subject of the training. If performing live injections on humans, the HCP Trainer must be authorized to perform such injections in the jurisdiction where the training session takes place.

All presentations, training programs, and product demonstrations (including injection procedures) of HCP Trainers must be consistent with the marketing authorization for the Aesthetic Product(s) that is the subject of the training.

Training sessions involving volunteer subjects as patients for assessment and treatment must comply with Applicable Laws and Codes.

If the training session includes a live injection procedure, it must be held at a facility which offers a safe and medically adequate clinical setting in compliance with Applicable Laws and Codes.

### 13.2 Customer Support Services

If permitted by Applicable Laws and Codes, Galderma may offer customer support services that are intended to help HCPs integrate Aesthetics Products into their practice and improve patient care and management. The selection of HCPs who are offered customer support services should be based on objective pre-determined criteria. All customer support service programs should be reviewed and approved by Legal Affairs and Medical Affairs.



## 14. Exceptions; business leaders' responsibilities; reporting violations

### 14.1 Exceptions

Any requested exceptions to this Code must be approved by the Galderma General Counsel and Chief Compliance Officer and the applicable Business Leader(s) serving on Galderma's Executive Leadership Team.

### 14.2 Business Leaders' Responsibilities

Business Leaders, in close collaboration with the HCP Compliance function, are responsible for developing documented procedures designed to implement the requirements of this Code for their business or function and training Galderma Employees under their management on such procedures.

Business Leaders shall also regularly monitor compliance with this Code with the guidance of the HCP Compliance and Internal Control functions.



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## 14.3 Reporting HCP Code Violations

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Galderma Employees are encouraged to speak up and report actual or potential violations of this Code or Applicable Laws and Codes (collectively, "HCP Code Violations") to the attention of Galderma. The Galderma Employee should report potential HCP Code Violations to any of the following: Senior or Line Manager or any member of the Human Resources, Legal or Ethics & Compliance functions.

In addition, while strongly encouraged to use these normal channels for reporting, subject to local regulations, Galderma Employees may also report HCP Code Violations by contacting the Galderma Integrity Reporting Hotline via web service or by telephone accessible on the Galderma intranet and internet sites. This system is operated by an external provider and provides the option, subject to local regulations, to speak up anonymously. All complaints concerning HCP Code Violations shall be thoroughly investigated and appropriate actions will be taken to address the outcome of the investigation, including taking disciplinary action up to and including termination of employment when appropriate. Galderma Employees who report HCP Code Violations, who provide information or otherwise assist in any inquiry or investigation of potential misconduct will be protected against retaliatory action.

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