

GALDERMA

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2021 JOINT MODERN SLAVERY STATEMENT

GALDERMA (UK) LTD AND GALDERMA AUSTRALIA PTY LTD

Contents

Introduction	2
Our company.....	2
Our manufacturing footprint.....	2
Supply chain and manufacturing: Australia-specific	2
Policies & procedures	3
Code of Ethics	3
Supplier Code.....	3
Anti-Bribery and Corruption (ABAC) Policy	4
Third parties and due diligence	4
Managing risks	4
Measuring the effectiveness.....	4
Training	4
Consultation	5

Note: Forward-looking statements involve certain risks and uncertainties that could cause actual results to differ materially from those contained in the forward-looking statements.

Introduction

This statement for the financial year ending 31 December 2021 is made in accordance with the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth) and is published on behalf of Galderma (UK) Ltd (Company Number 00715401) (**Galderma UK**) and Galderma Australia Pty Ltd (ABN 12 003 976 930) (**Galderma Australia**).

Our company

With a unique legacy in dermatology as well as decades of cutting-edge innovation, Galderma is the leading company solely dedicated to advancing dermatology for every skin story. We are strategically positioned in attractive, consumer-driven segments of the dermatology market, characterized by high growth fundamentals.

Through trusted partnerships with healthcare professionals, we ensure to meet individual consumer and patient needs with superior outcomes. Galderma is active or present in about 90 countries and in 2021 generated sales of 3.417B USD.



Our manufacturing footprint

Most of Galderma's products are manufactured at our production facilities located in Alby-sur-Chéran, France; Baie d'Urfé, Canada; Hortolandia, Brazil, and Uppsala, Sweden. The remaining products are manufactured by contract manufacturers.

Supply chain and manufacturing: Australia-specific | In the case of Galderma's operations in Australia, we do not manufacture any products locally. All of Galderma Australia's finished goods are sourced from our global warehouses or directly from contract manufacturers who service Galderma globally. To meet any additional needs in Australia, we engage a multitude of vendors for services including transport, warehousing, marketing and employment services.

Galderma Australia does not have any registered office in New Zealand, instead it distributes its products and services through a partner.

Policies & procedures

Galderma strives for the highest standards and integrity, with well-defined governance which guides how our company, employees and partners conduct business.

Galderma's Integrity Reporting Hotline provides employees as well as third parties with a channel to share concerns or violations of law, Galderma's Code of Ethics, or policies or which otherwise constitutes unprofessional or unethical behavior, also anonymously, if preferred.

Code of Ethics | Our [Code of Ethics](#) is an express declaration of adherence to the highest ethical standards in our work. It sets out Galderma's values and principles for business conduct and states that it is the responsibility of every Galderma employee to "*do the right thing, the right way*" to ensure the highest standards of integrity. It means that when we create value for our company and its stakeholders, such as the people and communities we serve, we should do so by acting in an ethical and socially responsible way. Among others, Galderma expressly commits to embracing diversity and respecting the rights of our fellow employees. Galderma commits to respecting the personal dignity, privacy and personal rights of every employee and is committed to maintaining a workplace free from discrimination and harassment.

Supplier Code | Our [Supplier Code](#) sets out the standards we expect our suppliers to adhere to when conducting business for us. These standards concern the environment, social aspects and business ethics and form an integral part of our supplier contracts unless, in exceptional circumstances, suppliers have implemented their own equivalent set of standards. It is the supplier's responsibility to communicate our standards to their employees, agents and subcontractors and to train them accordingly. This includes a clear position with regards to the following:

- **Prison and forced labor:** The supplier must under no circumstances use or in any other way benefit from forced labor. Likewise, labor in the form of indentured servitude is prohibited, as is the use of corporal punishment, confinement, threats of violence or other forms of harassment or abuse as a method of discipline or control.
The supplier shall not utilise factories or production facilities that oblige work to be carried out by unpaid or indentured laborers, nor shall the Supplier contract for the manufacture of products with subcontractors that engage in such practices or utilize such facilities.
- **Child labor:** The use of child labor by the supplier is strictly prohibited, as it places children at risk or can compromise their schooling or negatively impact their physical, mental, spiritual, moral or social development.
- **Working Hours:** The supplier must ensure that his/her employees work in compliance with all applicable laws and mandatory industry standards pertaining to the number of hours and days worked.
- **Compensation:** The supplier's employees must be provided with wages and benefits that comply with national and local applicable laws and binding collective agreements, including those pertaining to overtime work and other premium pay arrangements and other social protection related terms.
- **Workplace Environment:** The supplier shall provide employees with safe and healthy working/housing conditions. At the very least, potable, drinking water, adequate sanitation, fire exits and essential safety equipment, access to emergency medical care, appropriately lit and equipped workstations must be approved. In addition, facilities must be constructed and maintained in accordance with the standards set by applicable codes and ordinances.

Anti-Bribery and Corruption (ABAC) Policy | Galderma's Anti-Bribery and Anti-Corruption Policy builds on the core principles of the Code of Ethics, is consistent with international standards and laws and provides the minimum requirements for Galderma. Galderma prohibits all forms of bribery and corruption, whether involving a government official or private person or entity, whether direct or through a third party. To underpin this commitment, Galderma launched a company-wide Anti-Bribery and Anti-Corruption campaign in 2021, which was rolled-out on global, regional and local levels.

Third parties and due diligence

Any third party engaged by Galderma must conduct business ethically and is expected to comply with all our standards, including laws and regulations where we operate or the third party operates on our behalf.

Galderma applies a risk-based approach when conducting due diligence on its third parties. This includes vetting of the third party prior to engagement, monitoring throughout the relationship and providing adequate training to the third parties. Furthermore, Galderma started implementing a compliance management system in 2021, including a third party risk management module, further enhancing Galderma's due diligence program through 2022 and beyond.

Managing risks

Galderma is committed to establish a comprehensive and rigorous risk management process where emerging, strategic and operational risks are discussed and remediated when necessary. In 2021, the Company established a Global Risk & Compliance Council whose role is to establish, drive and oversee Enterprise Risk Management (ERM process) and the roll out of the Compliance Program.

In 2021, the Company also adopted a new Group Risk Policy, including assigned roles and responsibilities for risk management in an end-to-end process, ensuring integrated risk management and assurance. Standard Operating Procedures are regularly reviewed and updated and training plans are developed on those risks which are considered high. Galderma has mandated highly reputable rating agencies to perform audits on selected suppliers at regular intervals. As part of the audit, suppliers are required to submit their policies and compliance certificates. The scope is defined based on the risks associated to the country/location and the industry a supplier operates in as well as Galderma's spend on the respective supplier.

Measuring the effectiveness

As part of Galderma's Risk Management and of establishing corporate structures (see also under "Training"), Galderma has put strong efforts into building the necessary capabilities and measuring their effectiveness throughout 2021 and will continue to do so in 2022. This includes indicators such as reports submitted through Galderma's Integrity Reporting Hotline, training completion rates and supplier's compliance with the Supplier Code as well as an ESG reporting which has been initiated in 2021 with major progress planned for 2022 and beyond.

Training

Becoming an independent company in late 2019¹, Galderma significantly progressed in 2020 and 2021 in establishing the necessary corporate structures including a robust compliance and ethics organisation and program. Global and local training and procedure rollouts took

¹ Independent company creation following consortium acquisition in October 2019

place throughout 2021, including training on the Company's Code of Ethics, Anti-Bribery and Anti-Corruption Policy as well as on additional procedures and specific risk areas identified.

Consultation

This statement was prepared in consultation with relevant subject matter experts within the two reporting entities, Galderma (UK) Ltd and Galderma Australia Pty Ltd. The statement was prepared with input from procurement, human resources, legal & compliance, ESG & sustainability and finance, with specific input from those key functions in our UK and Australia markets.

The executive team of each reporting entity was given an opportunity to consider and provide comments on this statement prior to publication. This statement was approved by the Galderma Australia Board of Directors on 23 May 2022 and by the Galderma UK Board of Directors on 7 June 2022.

Galderma Australia Pty Ltd



Ercument Ates

General Manager Australia
and New Zealand

Date: 23 June 2022

Galderma (UK) Ltd



René Wipperich

General Manager UK and Ireland

Date: 23 June 2022