

GALDERMA

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Ethics & Compliance at Galderma

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

Galderma's Ethics & Compliance group supports Galderma's business and functions in the achievement of their objectives, providing guidance and advice on compliance matters while also promoting and ensuring adherence at all times to the highest ethical values.

Galderma's Compliance Program is aimed at enabling employees to do what is right and ensuring compliance with Galderma's Code of Ethics, Policies & Procedures, and applicable laws. Guiding principles, supporting Galderma's purpose, and strong rules, in accordance with relevant legal frameworks, exist in each of the countries in which we operate. Galderma's Code of Ethics is available in 13 languages and provided to all employees. All employees are trained regularly on Galderma's Code of Ethics and related topics.

Our Commitment to Society

Galderma is committed to conducting business in a manner that respects the rights and dignity of all people who are or may be affected by our business activities.

We strive to help shape the future of the science of dermatology by building and sustaining a strong and long-lasting community, bringing together industry, academics, healthcare professionals, consumers and patients.

Anti-Bribery and Anti-Corruption

Galderma prohibits all forms of bribery and corruption, whether involving a government official or private person or entity, and whether direct or through a third party. Galderma's Anti-Bribery and Anti-Corruption ("ABAC") Policy clearly sets out ABAC requirements and expectations for all Galderma employees.

Animal Testing

As a responsible corporate citizen, Galderma places high importance on animal welfare. The company strives to minimize the use of animal testing and, wherever possible, replace it with scientifically validated alternatives. For instance, in the case of cosmetic products, Galderma does not rely on animal testing at any stage of product innovation, development, or manufacturing.

However, for pharmaceutical products and certain medical devices, regulatory authorities may require rigorous in-vivo testing, including animal testing, before approval for human use. In these cases, Galderma has established a robust ethical framework that sets out the minimum requirements for external partners conducting animal testing on behalf of Galderma. All such in-vivo studies must:

- Be reviewed by Galderma's internal Animal Welfare and Ethics Committee
- Be conducted in accordance with all appropriate international (e.g., NIH guide for the care and use of laboratory animals, Association for the Assessment and Accreditation of Laboratory Animal Care (AAALAC) guidelines) and/or local regulations (e.g., Directive 2010/63/EU, US Animal Welfare Act)
- Comply with the internationally recognized 3Rs principles: Replace, Reduce, Refine

Compliance with Galderma's framework may be assessed through audits and site visits, which may be conducted by Galderma or qualified third parties. This approach reflects Galderma's ongoing commitment to ethical research practices and responsible scientific innovation.

Community Initiatives

Galderma is committed to supporting legitimate and worthy initiatives in the communities in which we operate and to promoting and supporting public health. Such support must never be offered in order to procure an improper advantage for Galderma, nor provided as a way to recommend or promote Galderma products. Galderma prohibits contributions by any Galderma business to political parties or candidates.

Responsible Promotion and Marketing of Products

Galderma's Code on Interactions with Healthcare Professionals ("HCP Code") defines how employees and businesses are expected to conduct themselves when interacting with HCPs. The HCP Code lays out key principles and standards including the requirement of fair, balanced, truthful and non-misleading informational content in both educational items relating to Galderma products and promotional products.

Further, a compliance framework (guided by the HCP Code), provides guidance on how to address promotional and non-promotional materials, events, professional meetings, external funding, HCP and Healthcare Organization ("HCO") engagements, interactions with patients and patient organizations, and market research.

Speak Up

Galderma has a dedicated Speak Up program in place with a hotline ("Integrity Reporting Hotline") where Galderma employees and business partners can raise concerns anonymously (see also "Raising a concern" below), with a dedicated governance system including a well-defined process for investigating suspected misconduct. Galderma does not tolerate any form of retaliation against anyone who speaks up in good faith.

Transparency

Galderma has procedures in place to ensure disclosure of information required by the applicable national transparency laws, regulations and/or industry codes. The documents below are the transparency reports of Galderma affiliates that publish such information in compliance of local EFPIA ("European Federation of Pharmaceutical Industries and Associations") Member Associations' Codes. Please note that some Galderma affiliates have published reports directly on relevant local websites.

Here you will find latest relevant transparency reports:

- [Transparency reports 2024](#)
- [Transparency reports 2023](#)
- [Transparency reports 2022](#)
- [Transparency reports 2021](#)
- [Transparency reports 2020](#)
- [Transparency reports 2019](#)

Raising a Concern

Misconduct is defined as any conduct that violates the Code of Ethics, company policies or laws. Concerns can be reported through [this confidential link](#).