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*Within the scope of this Anticorruption Code of conduct, LFB means Laboratoire Français du Fractionnement et des Biotechnologies and its subsidiaries, sub-subsidiaries and joint ventures (more than 50% owned by LFB).*

# A word from Jacques Brom, LFB Chief Executive Officer

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“LFB is committed to fulfilling its responsibilities to blood donors, patients, healthcare professionals, its employees, its partners, its shareholder, and society at large. LFB has established a corruption prevention program based on a zero tolerance approach for any practices that undermine the fight against corruption and other breaches of probity.”

LFB aims to develop, manufacture and market biological medicinal products for the treatment of patients with serious and often rare diseases.

LFB is committed to fulfilling its responsibilities to blood donors, patients, healthcare professionals, its employees, its partners, its shareholder, and society at large.

LFB has established a corruption prevention program based on a zero tolerance approach for any practices that undermine the fight against corruption and other breaches of probity.

LFB's Code of conduct is one of the tools upholding these commitments; it is an integral part of the daily lives of all the Company's employees: everyone is expected to comply with the code, as well as LFB's interests and reputation.

LFB is grateful to these women and men for their unyielding commitment to observe the Code of conduct in order to meet our legal obligations and our mission of serving patients.



# LFB's missions and values

LFB is a biopharmaceutical group that develops, manufactures and markets plasma-derived medicinal products and recombinant proteins for the treatment of patients with serious and often rare diseases.



Created in France in 1994, LFB is now a leading European company providing plasma-derived medicinal products to healthcare professionals. Our mission is to offer patients new treatment options in three major therapeutic areas:

- Immunology
- Hemostasis
- Intensive care.

LFB currently markets 15 biomedical products in some 30 countries.

Beyond values, LFB encourages five types of behavior:

- Act with exemplarity
- Cultivate excellence
- Dare to take the initiative
- Develop team Spirit
- Succeed with integrity.

These five values are the essence of LFB's corporate culture. LFB employees are expected to embody, uphold and express them every day.

These strong values are crucial to LFB's success: achieving our goals in the right way is just as important as their achievement.

Not only do the values help to build a culture of performance and results, but they are also the building blocks of a caring, fulfilling work environment, which is equally important.



# Why do we need an Anticorruption Code of conduct?

At LFB, the Anticorruption Code of conduct sets the standard in terms of preventing and detecting corruption, breaches of probity, and influence peddling.

**LFB undertakes to comply with all applicable laws, regulations and conventions** relating to the fight against corruption across its regions of operation, in particular the French Sapin 2 Law, the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act (UKBA) and the OECD Anti-Bribery Convention.

*Probity, integrity and transparency must be shared goals and observed by all LFB employees and its partners. When observed together, LFB undertakes to actively fight corruption and influence peddling.*

**The Anticorruption Code of conduct aims to:**

- **enact the rules and principles** adopted by LFB to fight corruption;
- help its readers to **identify situations at risk** of corruption or influence peddling;
- guide LFB employees and partners in their **ethical decision-making** on a daily basis.

*LFB employees and partners must apply the rules and principles set out in this Code, even when they are more stringent than local laws and regulations. Failure to do so will make LFB employees liable to disciplinary actions. Likewise, any breach of anticorruption laws may result in serious civil and criminal penalties for LFB, its employees and its partners.*

Our subsidiaries, in concert with the Corporate Compliance department, may implement anticorruption measures consistent with local laws and this Code.



## WHO IS CONCERNED?

This Code applies to **all LFB employees**, regardless of their work agreement, status or position, whether senior management or staff.

LFB's **partners**, such as its service providers, temporary workers, consultants, subcontractors and suppliers, must also adhere to the principles set out in this Code.

*This Anticorruption Code of conduct is effective since its date of publication, April 16, 2018, and was updated on December 9, 2022.*



# OUR GUIDING PRINCIPLES

This chapter defines and illustrates the various types of behavior to adopt or prohibit on a daily basis to prevent offenses of corruption or influence peddling, as well as conflicts of interest. It is based on the processes, group policies and local policies of LFB.

# Fight corruption

— We reject all forms of corruption.

**Active corruption** means giving or promising, whether directly or indirectly, an undue advantage of any kind to a person in exchange for a favorable decision or act. **Passive corruption** means accepting or requesting such advantage.

We can distinguish between:

- **public sector corruption**, which involves a public official;
- **private sector corruption**, which involves private natural or legal persons.

*LFB exercises great caution in its dealings with public officials and healthcare professionals, subject to specific laws and regulations.*

A **public official** is a person who has been appointed or elected to fulfill a public service mission, or who holds a position of official authority granted by a government (e.g. minister, member of a local authority, police officer, hospital practitioner, hospital buyer, etc.).

**Healthcare professional** means different things from one country to another. This Code adopts a broad definition of the term:

- any natural or legal person with the capacity to prescribe, distribute, supply, purchase, administer or recommend an LFB product in the course of their work (including physicians, pharmacists, interns, nurses, health-professional associations, patient associations, etc.);
- healthcare sector institutions (e.g. US Food and Drug Administration, French National Health Authority).



## KEY TAKEAWAY

LFB rejects all forms of corruption, whether active or passive, public or private. LFB expects its partners to adopt the same zero-tolerance approach to corruption.

We exercise great caution in our relations with public officials and healthcare professionals; in particular, we confirm their compliance with legislative and regulatory provisions, and with Group and local procedures.

- Group Framework SA11 Interactions with HCPs/HCOs
- CO01 Policy Interactions with patient associations
- LFB Group Policy C116 – Purchases

What to do when in doubt? →

## IN PRACTICE

Can you pay a member of the committee in charge of the economic evaluation of medicinal products to obtain a better price for your product?

**No.** This is active public corruption and makes both LFB and the employee liable to potential civil and criminal penalties. It would also subject the LFB employee to disciplinary sanctions.

Can you pay a commission to one of your supplier contacts so that the supplier lowers the prices?

**No.** This is active private corruption and makes both LFB and the employee potentially liable to civil and criminal penalties. It would also subject the LFB employee to disciplinary sanctions.

A sales representative offers to pay you a commission if you can secure higher pay for him as part of his agreement with LFB.

This is a **retro commission**. This practice is **prohibited**. Accepting such payment is passive corruption.

# Fight other breaches of probity

— We reject all breaches of probity.

Breaches of probity can be punished as similar infringements to corruption.

**Unlawful taking of interest** is an offense where a person performing public functions and holding office in the public sector keeps or takes up office in the private sector despite a conflict of interest with that person's office in the public sector.

**Favoritism** is an offense where a public official gains or attempts to gain an advantage for others with respect to winning public contracts and public service delegation contracts.

**Embezzlement of public funds** occurs when a person representing the public authority destroys or misappropriates a deed, title or public or private funds entrusted to them by virtue of their position.

**Collusion** occurs when a person representing the public authority abuses their powers by using their office to collect undue funds.

Another form of corruption, **facilitation payments**, are payments made to public officials to accelerate or facilitate the normal course of business or the performance of an action. Such payments are strictly prohibited at LFB.

*Accordingly, LFB exercises great caution in its dealings with public officials to avoid being compromised by such conduct. We reject all breaches of probity and report any conduct that undermines our guiding principles (see “Report behavior or situations contravening the Code of conduct”, page 18).*



## KEY TAKEAWAY

Some types of conduct may not amount to corruption strictly speaking but can still be construed as breaches of probity. They can also lead to criminal sanctions.

LFB rejects all breaches of probity.

Moreover, LFB prohibits facilitation payments.

What to do when in doubt? →



## IN PRACTICE

One of your friends, who is also the member of a tender committee, shares inside information with you so that you can submit a better offer than your competitors. Is this legal?

**No.** This is a case of favoritism and the basic principles of free access, equality of applicants and transparency have been violated.

One of our shipments is blocked at customs. The customs officer offers to speed up its clearance in return for a small amount of money.

**You must refuse**, as this would constitute a facilitation payment. This type of payment is strictly prohibited at LFB.



# Fight influence peddling

— We reject all forms of influence peddling.

**Influence peddling** occurs when a public official solicits or accepts, directly or indirectly, any promise or advantage in order to use their real or apparent influence to obtain a favorable decision (e.g. public contracts, employment) from an authority or a public administration.

Influence peddling is distinguished from corruption through the presence of an intermediary who will exercise their influence with the authority or public administration. The intermediary will use or abuse the power they enjoy on account of their office, friends or relationships with public officials.

We can distinguish between:

- **active influence peddling**, when a person holding public office is asked to use their influence in our favor, in exchange for an advantage;
- **passive influence peddling**, when a person holding public office accepts an advantage in exchange for using or abusing their influence.

*Influence peddling involves three people: the beneficiary (the person who offers the advantage), the intermediary (the person who uses their influence in exchange for the advantage), and the target person who holds decision-making authority (the authority or public administration).*



## KEY TAKEAWAY

It is prohibited to directly or indirectly ask a public official to use their real or apparent influence to obtain a favorable act or decision from an authority or a public administration.

What to do when in doubt? →

## IN PRACTICE

There is an elected official who I know well. He can press an administration to issue an authorization in exchange for a sum of money.

It is **prohibited** to offer an advantage to this elected official to press the administration. This would constitute an offense of active influence peddling.

A hospital's director agrees to press the hospital's purchasing manager to award a public contract to your company in exchange for the promise to hire his daughter in your company.

This is **prohibited**, as it constitutes an offense of passive influence peddling.

# Avoid conflicts of interest

— We must inform our line manager in the event of a risk of conflict of interest concerning us or concerning a third party with whom we are considering a work relationship.

A **conflict of interest** occurs when our personal interests differ from LFB's interest and can thus undermine the objectivity of our decisions. Each decision must serve the needs of LFB and not our personal interests.

The term “personal interests” must be understood in the broad sense. In addition to our own personal interests, they can include the interests of our family or loved ones. They can be material, financial, family-centered or moral in nature.

*We must also prevent the appearance of any conflict of interest by taking appropriate measures, such as withdrawing from certain decision-making processes, for example.*

A conflict of interest may occur when LFB works with third parties (natural or legal persons) who place it in a situation where their personal interests come into conflict with their assignment for LFB.

Accordingly, LFB ensures that every third party with which it enters into a business relationship does not create a conflict of interest.

A conflict of interest may lead to an unlawful taking of interest or favoritism, which are both illegal (see “Fight breaches of probity”, page 8).



## KEY TAKEAWAY

Conflicts of interest may undermine the objectivity, impartiality and independence of our decisions. Each decision must serve the needs of LFB and not our personal interests. If an employee is or believes themselves to be in a situation of conflict of interest, they must immediately inform their line manager thereof.

→ LFB Group Policy C116 – Purchases

What to do when in doubt? →

## IN PRACTICE

**My spouse's company is likely to provide services to LFB. Can this company be onboarded as a service provider?**

*This situation presents a potential conflict of interests. You must report it to your line manager and withdraw from any decision-making processes regarding this company.*

**You would like to work with an expert who currently sits on a scientific commission and is likely to give its view on LFB's operations. Can we work with this expert?**

**No.** We may not enter into a working relationship with this healthcare professional, who would face a conflict of interest.

# Assess third parties

When assessing the third parties with which LFB deals or is about to deal, we consider the risks of corruption and conflict of interest.

**Third party** means any natural or legal person with which LFB seeks to enter into a work relationship or is already in a relationship, such as a supplier/service provider, distributor, or client.

**When we start working with a third party, we must:**

- ✓ assess the risks of corruption associated with such third party.
- ✓ perform an in-depth compliance review of the third party if a strong corruption risk is identified.
- ✓ report a red flag that may suggest a high third-party corruption risk to the Corporate Compliance department.

## IN PRACTICE

**A supplier asks you to pay funds into a bank account in a country other than the one in which the services will be provided, and other than the supplier's country. What should you do?**

*This could be an illegal off-shore payment. This red flag must be reported to the Corporate Compliance department for analysis and recommendation.*

**You plan to work with a distributor established in a country perceived to be corrupt. What should you do?**

*You must contact the Corporate Compliance department who will conduct an in-depth review on the concerned case and issue a recommendation.*



## KEY TAKEAWAY

**LFB's reputation depends on its partners' integrity. We assess the integrity of the third parties with which we work or intend to work.**

We assess the integrity of our third parties before entering into a work relationship, and throughout the relationship.

What to do when in doubt? →

# Frame gifts and invitations (hospitality/entertainment)

— We refuse all gifts and invitations that are excessive, inappropriate, or aim to influence a business decision.

**Gifts** mean any material benefit, whether or not given in a disinterested manner. **Hospitality** covers the payment of meals, transport and accommodation. **Entertainment** means any event or performance, such as shows, concerts, sports events, etc.

*It is prohibited to give or receive gifts, hospitality, and entertainment with a view to influencing a business decision.*

## As LFB employees, we may not:

- ✗ accept gifts, hospitality or entertainment of an inappropriate value;
- ✗ give cash-equivalent gifts (e.g. gift vouchers);
- ✗ give a gift or entertainment to a healthcare professional;
- ✗ give or receive a gift or invitation during a tendering or negotiation period.

## We may give or receive gifts, hospitality or entertainment:

- ✓ authorized by the law and LFB procedures;
- ✓ of an appropriate amount;
- ✓ exceptionally and outside of a tendering or negotiation period;
- ✓ following approval from our line manager.

We may only give healthcare professionals hospitality in the context of a professional, promotional, scientific or medical gathering, in compliance with the law, professional codes, and the applicable corporate and local procedures.

## IN PRACTICE

A hospital pharmacist currently sits on a tender committee for a tender for which LFB has submitted a bid. You would like to invite the pharmacist to lunch to discuss the tender. Is it allowed?

**No.** This invitation could be perceived as an attempt to influence the tender committee's decision and, accordingly, as attempted active corruption.

One of my suppliers wants to give me a touch pad to better use its latest app. Can I accept this gift?

**No.** This is an expensive, personal gift, which could be perceived as attempted corruption. By accepting it, you may become liable for passive corruption.



## KEY TAKEAWAY

It is prohibited to give or receive gifts, hospitality, and entertainment aimed at influencing a business decision.

Doing so could produce a risk of corruption. Should this occur under exceptional circumstances, it must be approved by your line manager.

- Group Framework SA11 Interactions with HCPs/HCOs
- CO01 policy Interactions with patient associations
- CI17 LFB Group Policy Professional and travel expenses

What to do when in doubt? →

# Manage donations, corporate patronage, sponsorship and lobbying

— Donations, corporate patronage, sponsorship, and lobbying are not prohibited, but they are governed by laws, regulations and LFB policies.

**Donations** are financial contributions or contributions in kind (e.g. products) with no return-benefit for LFB. A donation aims to fund activities related to a beneficiary's corporate purpose.

**Corporate patronage** is financial, or material support provided to a legal entity for the performance of its business, as part of a specific project or event.

**Sponsorship** means any agreement with an organization in view of improving the sponsor's reputation and image in exchange for financial compensation.

*LFB employees must refrain from making donations or engaging in corporate patronage and sponsoring activities if LFB is likely to receive excessive or unjustified compensation, or an undue advantage in return.*

**Lobbying** covers all actions by a company or a group of people with the aim of influencing political or public decision-makers to enforce a point of view in the decision-making process. Lobbying is a legal activity, but its practice is regulated. It should not be misused for corrupt purposes or actions contrary to probity.

As part of their lobbying activities, LFB employees and partners must refrain from all acts of corruption or influence peddling and all actions that could unduly influence any decision with an impact on LFB's business.

*Rules on the transparency of donations, corporate patronage, sponsoring and lobbying must be observed in the countries where it is required by laws, regulation, Business Codes of Ethics etc.*



## KEY TAKEAWAY

No lobbying, donations, corporate patronage or sponsorship activities may be carried out if LFB is likely to receive excessive or unjustified compensation, or an undue advantage in return.

- Group Framework SA1 | Interactions with HCPs/HCOs
- CO01 Policy Interactions with patient associations

What to do when in doubt? →

## IN PRACTICE

The director of a committee granting marketing authorization for medicinal products chairs an association. Can LFB give a donation to this association?

**No.** Such financing could create the impression that LFB is trying to influence the director of the committee granting marketing authorization.

I would like to change a regulation that is unfavorable to LFB's activities. Can I pay a member of government via a public relations agency?

**No.** This would be an act of corruption.

A patients association intended to improve the quality of life of hemophiliacs asks LFB for a donation in order to carry out its activities. Can LFB grant them a donation?

**Yes,** as long as it complies with applicable laws and regulations and internal policies.

# Frame growth transactions

— We systematically reach out to LFB’s Corporate Legal and Compliance Departments to regulate our growth transactions and, more generally, our business partnerships.

A **growth transaction** means an acquisition by LFB of all or part of a company, or the merger of a LFB business with another company.

A **joint venture** is an agreement between LFB and one or more organizations with a view to carrying out a project via a new structure in the common interest of all organizations involved.

*With these types of transactions, we must ensure that the Corporate Compliance department has assessed the partner with respect to corruption (see p. 11).*

We are especially vigilant when the business target is located in a region with a high corruption risk.

The Corporate Compliance Department supports LFB in evaluating potential business targets within the framework of growth transactions and with respect to organizations under consideration for a joint venture. It helps us to prevent reputational risk for LFB and accountability for acts of corruption perpetrated by an organization prior to its integration into LFB.

## IN PRACTICE

We want to acquire a plasma collection center. We must act quickly as other companies are interested. Can we move forward without involving the Corporate Legal and Compliance Departments?

**No**, we require the Corporate Legal and Compliance Departments’ input to secure the transaction by identifying any risks facing LFB in the event of a takeover.



## KEY TAKEAWAY

LFB’s reputation can be affected by that of its partners during our growth transactions and our business partnerships in general. Accordingly, we must rely on the Corporate Legal and Compliance Departments to legally secure the transaction and confirm the integrity of these third parties.

→ PVI6 Procedure - Legal Compliance Intellectual Property governance

What to do when in doubt? →



## OUR RESPONSIBILITIES

We are responsible for preventing and identifying acts of corruption. All LFB employees must apply the principles set out in this Code and take action if there are any questions or doubts.

# Know and respect the Anticorruption Code of conduct

The principles and ethical values set out in this Code must be read, understood and respected by all.

## As LFB employees, we must:

- ✓ read the principles and rules set out in this Code;
- ✓ apply and implement them on a daily basis;
- ✓ contact our line manager or the Corporate Compliance Department if there are any questions or doubts.

## As general manager of an affiliate, head of Department or site manager, we must:

- ✓ take care to implement this Code and ensure our teams comply with its provisions;
- ✓ set an excellent example in this regard;
- ✓ answer any requests and questions from the teams and redirect them to the Corporate Compliance Department if necessary;
- ✓ forward any report to the Corporate Compliance Department.

*Any violation of this Code, LFB's policies or anticorruption laws and regulations [...] may result in disciplinary action.*



Any violation of this Code, LFB's policies or the anticorruption laws and regulations applicable in the countries where LFB conducts business may result in:

- for LFB employees: disciplinary action, up to and including dismissal, in accordance with local employment laws and the disciplinary procedures adopted locally;
- for service providers, temporary workers and external consultants: disciplinary measures taken by their employer;
- for partners and relevant third parties: their relationship with LFB will be reconsidered.

This Anticorruption Code of conduct is appended to the rules and regulations of all affiliates of LFB or signed by LFB employees.

What to do when in doubt? →



# When in doubt, ask questions

When in doubt, the golden rule is to talk about it.

If you have any doubts or questions regarding a risky situation, such as:

Does it comply with LFB's Anticorruption Code of conduct?

Is this action or decision legal?

Can I talk about it freely and without embarrassment to my professional and personal entourage?

Does it comply with LFB's policies and procedures?

Would I be comfortable if this action or decision was featured on the front page of a newspaper?

If you answered “**No**” to any of these questions or you feel unsure, please discuss it with your **line manager** or the **Corporate Compliance Department**.



## ANY QUESTIONS?

LFB's Corporate Compliance Department is available to explain the anticorruption principles and values.

Corporate Compliance Department

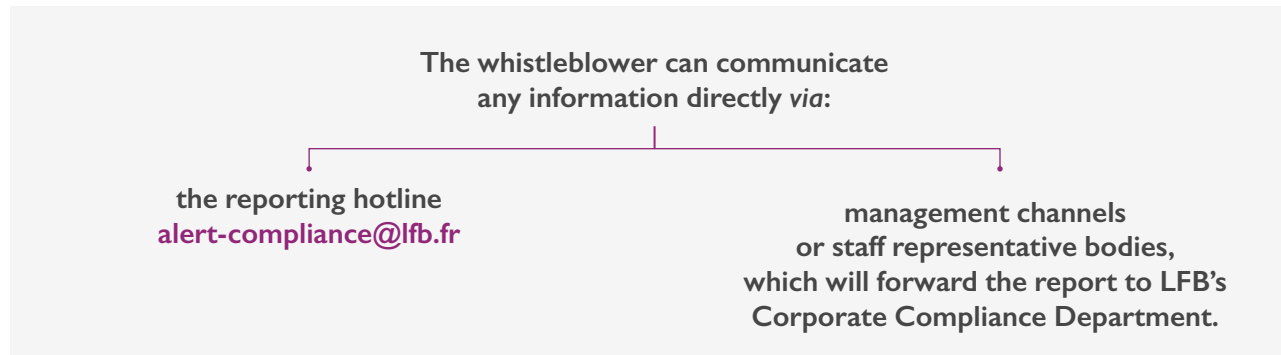
■ Telephone: +33 (0)1 69 82 73 47

■ E-mail: [info-compliance@lfb.fr](mailto:info-compliance@lfb.fr)

# Report behavior or situations contravening the Code of conduct

We report any conduct that is inconsistent with our guiding principles.

Any LFB employee or partner can report any information on a threat, a serious incident or behavior contrary to this Code of conduct to LFB.



*The report must be made at no direct charge and in good faith in order to benefit European **whistleblower protection** against any retaliation or discriminatory measures. This protection is also extended to any persons who helped the whistleblower.*

However, LFB may prosecute a whistleblower acting in bad faith.



## KEY TAKEAWAY

LFB's employees and partners can report any information on a threat, a serious incident or behavior contrary to this Code of conduct to LFB in a secure and confidential manner.

They can send an email to:

[alert-compliance@lfb.fr](mailto:alert-compliance@lfb.fr) →

→ GC03 Whistleblowing procedure



## Data privacy

Personal data may be collected as part of the report and the resulting investigation, where applicable. For more information on the processing of personal data, please read the whistleblowing procedure.

Unless otherwise instructed by the legal authorities, LFB guarantees to keep **strictly confidential**:

- the whistleblower;
- the people under investigation;
- the information collected.

# CONTACTS

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Corporate Compliance Department

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+33 (0)1 69 82 73 47

E-mail :  
[info-compliance@lfb.fr](mailto:info-compliance@lfb.fr)

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LFB on social media:



This second version of LFB's Anticorruption Code of conduct, with reference GC 02, has been appended to the rules and regulations of all affiliates of LFB or signed by LFB employees.

