Code of conduct

MAYOLY
Taking your care to heart

A MESSAGE FROM THE CEO

As a century-old, MAYOLY has always put people first. Our mission and purpose are to develop safe and effective health products for the ultimate benefit of patients and consumers. This commitment lies at the heart of everything we do and drives every decision we make.

As expectations and scrutiny regarding ethics decisions and behaviors continue to rise in our industry, our group strives to operate through uncompromising and exemplary business ethics. We prioritize business integrity as a fundamental aspect of our culture, strategy, and operations. We choose to achieve our results in the right way. I believe that upholding ethical practices, alongside scientific excellence, is paramount to fulfilling our ambitious goal to become an international reference in Consumer HealthCare.

Consistent with our mission, we adhere to the ethical standards described in the Code throughout all our operations. I have full confidence that everyone at Mayoly will enforce and become a true ambassador of our new Code of Conduct 2025, using it as a guiding light in every decision-making process. I expect our leaders and managers to exemplify the values outlined in the Code, serving as role models for our entire workforce and partners.

This unwavering commitment to integrity fosters trusts among patients, consumers, healthcare professionals, authorities, external stakeholders, shareholders, investors, employees, and benefit ultimately to our company in the long term. Applying the Code is crucial to ensure sustainable growth in the public interest and to build lasting relationships with our stakeholders. To support our ethical commitment, we foster an environment of openness where every employee at Mayoly is encouraged to seek advice, request assistance, ask questions, or raise concerns freely. When needed, I expect you to voice your concerns through the channels provided in the Code, assuring you that all reports will be handled with the utmost care and confidentiality. Retaliation against individuals acting in good faith will not be tolerated.

This Code of Conduct is consistent with our Corporate Social Responsibility approach. It is intended for the Group's officers, managers and employees, and supplements, rather than replaces, the legislative, regulatory, and contractual provisions in force in those countries where the Group operates. The rules and principles it contains apply to everyone at all times, regardless of their grade, seniority, location or role.

I entirely commit to this Code and trust that each of you shares the same dedication. This Code proudly defines who we are and how we operate at Mayoly, for the benefits of patients and consumers worldwide.

Nicolas Giraud
CEO, Mayoly

Content

WHY THIS CODE? 4

WE SPEAK UP 5

1 CONDUCTING OUR BUSINESS RESPONSIBLY

1.1 Combat corruption 7

1.2 Engage business partners ethically 9

1.3 Demonstrate financial integrity 11

1.4 Champion fair competition 13

1.5 Respect privacy 15

1.6 Ensure product quality and safety 17

1.7 Promote and interact with our health stakeholders responsibly 19

2 CARING FOR OUR COMPANY

2.1 Prevent conflicts of interests 22

2.2 Protect our company's asset 24

2.3 Communicate responsibly 27

3 CARING FOR OUR PEOPLE AND OUR WORLD

3.1 Embody diversity, equity, and inclusion 30

3.2 Promote respect & reject harassment and discrimination 32

3.3 Ensure safety and well-being in the workplace 34

3.4 Respect human rights 36

3.5 Protect the environment 39

WHY THIS CODE?

This code, endorsed by the Executive Committee reflects Mayoly's values and culture. It embodies our commitment in ensuring that we act with fairness, integrity, and accountability, and demonstrate our unwavering respect for consumers, patients, employees and stakeholders. This new version is built upon our pre-existing code issued in 2018, which primarily focused on antitrust, anticorruption, and promotion. It now expands into new and emerging areas in our industries, such as corporate social responsibility, sustainability, human rights, data and asset protection, and more.

It describes the level of commitment concerning ethical standards that Mayoly expects from all its personnel worldwide, including management, employees, officers, and from its contractors, regardless of their position or seniority, throughout the conduct of our operations and at every stage of the value chain.

The Code describes what we believe in and how we interact with consumers, patients, employees, healthcare professionals, business partners, shareholders, authorities, and others. It serves as a vital compass in guiding our daily decisions. We have to consult it regularly especially when we face dilemmas.

As it cannot tell us how to behave in every single situation, when necessary, additional guidance is available through Mayoly's policies, procedures, and training materials. And if clarity on the right course of action is still uncertain or further counsel is required, we turn to our managers, the Compliance function, or other relevant experts, as outlined in this Code.

We are committed to diligently apply this Code. Any breaches of its principles and standards may result in disciplinary measures, including reprimands, warnings, or termination of employment, in accordance with applicable employment regulations.

In jurisdictions where laws, regulations, or codes impose stricter standards than those outlined in our Code, we unfailingly adhere to the most rigorous requirements.

We are fully committed to the spirit and the letter of this Code, and we expect the same commitment from each of you.

The Executive Committee

WE SPEAK UP

We foster a culture of listening and speaking up where all employees are empowered to voice their concerns and report any issues at any time without fear of retaliation.

When employees speak up and raise concerns, they help to protect themselves, their colleagues and Mayoly's image and reputation.

OUR PLEDGE

- We report any actual or suspected irregularities whether they pertain to general operations or financial matters concerning Mayoly. This includes violations of the Code of Conduct, company policies, procedures, as well as any relevant laws, regulations, and codes.

- We are encouraged to communicate with our managers, Human Resources, Compliance, or any other available reporting channels locally. Additionally, concerns can be reported using the contact information provided below: https://report.whistleb.com/en/mayoly

- While anonymous reporting is always an option, we are encouraged to identify ourselves in case further information is needed during the investigation. Confidentiality will be maintained to the extent possible considering the need to fully investigate reported concerns. All reports will be timely handled with care and professionalism, by an independent, experienced and competent team, granted with sufficient authority and resources. A raised concern, when confirmed by an investigation, will be followed by unbiased and proportionate actions if the facts are confirmed.

- As employees, our rights to confidentiality and privacy, as outlined in applicable laws, will always be respected.

- Mayoly commits to not retaliating against any employee who reports a concern in good faith, which includes for example refraining from discharge, demotion, suspension, threats, or harassment, even if the facts reported prove to be inaccurate or no further action is taken.

- We report alerts based on facts and in good faith. We understand that abusive or malicious reports may lead to disciplinary sanctions.

Q&A

What should I expect after I report a concern?

Appointed and qualified professionals will address all questions and reported concerns. If an investigation is required, it will be conducted confidentially, in a fair and objective manner, and without retaliation. When possible, you will receive status updates.

REFERENCES

→ Group Alert Management Policy

CONTACT

Your Local Contact or the Global Department of the Function(s) below:

→ Compliance

COMBAT CORRUPTION

We strongly believe that corruption has multiple severe effects on patients, society and on the environment: it distorts fair trade and impairs innovation, involves the misuse of public health resources, can lead to health-related disasters, harms human rights and local communities, among others. We unequivocally reject corruption and commit to conducting business fairly, with integrity and transparency, grounded in the merits of our products & services.

OUR PLEDGE

1.1.1 We adhere to all applicable national and international laws, regulations, and codes that prohibit any form of corruption and bribery.

1.1.2 We prohibit Mayoly personnel, and third parties acting on behalf of Mayoly, from offering, promising, making, authorizing, requesting, agreeing to receive, or accepting, directly or indirectly through third parties, any transfer of value to or from any private person or organization or any government officials, and public organizations, for the purpose of influencing their behaviours or decisions in order to obtain or retain an undue business advantage for Mayoly.

1.1.3 Bribes can take many forms for example, cash payments, lavish entertainment, excessive or non-business-related hospitality, contractual payments, gifts, favours, debt forgiveness, free products, loans, discounts, political contributions, grants, donations, etc., that would be provided in order to obtain or retain an undue business advantage for Mayoly.

1.1.4 Improper business advantage can include a government official granting excessive product prices, overlooking a risk or a law violation, or tolerating non-compliance with applicable laws, not performing a task that should otherwise be performed (e.g., not conducting a required inspection prior to issuing a permit, not withdrawing a product with safety issues from a market, not pursuing corruption practices, etc.), accelerating or reducing administrative processing (e.g., customs duties, market approvals, etc.), granting favourable tax treatment, etc.

1.1.5 We maintain accurate books and records to reflect all our financial transactions. All “off-the books” payments and any

knowing falsification of company books and records to cover up any improper payment are prohibited. This prohibition applies regardless of amount and includes the falsification of books and records to conceal commercial bribery and any other corrupt or improper payments.

Q&A

A highly significant Healthcare Professional (HCP) in dermatology has recently been appointed as the chairman of the Registration Committee in our country. In a couple of months this HCP will preside this committee during which Mayoly will present one of our new products. Before we approach the meeting date, I am considering inviting this HCP to two speaking engagements to foster a closer relationship with Mayoly and enhance her understanding of Mayoly's product.

Is this permissible?

No, you should refrain from using speaking engagements and contracts to bolster the loyalty of an HCP, thus potentially influencing his attitude towards Mayoly when making crucial administrative decisions. These decisions must be made independently and solely in the best interest of patients and public finances.

REFERENCES

→ Anticorruption Policy

CONTACT

Your Local Contact or the Global Department of the Function(s) below:

→ Compliance

→ To report concerns please see the section "We Speak Up".

ENGAGE BUSINESS PARTNERS ETHICALLY

We engage internationally with various third parties, including distributors, suppliers, sales and marketing agents, consultants, intermediaries, strategic joint venture partners, in diverse capacities. Mayoly and its personnel may be held accountable for the behaviours of third parties it interacts with. Therefore, we meticulously select the most suitable business partners that adhere and comply with the highest ethical standards.

OUR PLEDGE

1.2.1 We require all our third parties who act on Mayoly' behalf to always operate with high ethical standards and in compliance with applicable laws, regulations, and codes, particularly concerning corruption, antitrust, privacy, quality, human rights, workers' rights, and environmental protection.

1.2.2 To maintain these standards, we ask the suppliers in scope to sign our Sustainable Procurement Charter.

1.2.3 We conduct due diligence on potential third parties with a significant risk profile to verify their capabilities, reputation, record of integrity consistent with this code, before entering a business relationship. For example,

- We engage third parties based on a genuine need for goods or outsourced services,
- We select third parties solely based on their merit, unquestionable expertise and solid reputation, and their compliance with applicable industry standards.

1.2.4 We conclude written arrangements that are pre-approved by the legal department before engaging with third parties and require compliance with applicable Anticorruption laws in all contracts.

1.2.5 We pay commissions, compensation, reimbursement, and other expenses that are reasonable and commensurate to the services provided, and we ensure they are properly reflected in Mayoly's financial statements.

1.2.6 Throughout the relationship we remain vigilant, and we conduct regular monitoring, training, auditing, and other management controls to help detect, prevent, and remediate actual or potential non-compliant activities or improper

conduct by our third parties, particularly regarding payments and expense reimbursements.

1.2.7 We enable our third parties, when faced with a potential non-compliant situation in connection with Mayoly's business, to report it via the reporting channels in this code.

1.2.8 We comply with all applicable customs, import and export controls, trade sanctions, and other trade compliance laws.

Q&A

While reviewing the invoice from our travel agency, I noticed a line for €5,000 with a description of the expense that is not very clear. I trust our agency, and I am inclined to approve the payment. **Is this the correct course of action?**

No. You must never treat invoices and payments as routine operations, to be approved mechanically. You must attentively review such requests, ask questions, seek clarifications, and engage with third parties accordingly when doubts arise. Payment requests that are vague present a risk as they cannot evidence that they are a legitimate business expense, thus they do not comply with our standards and must not be processed.

REFERENCES

- Anticorruption Policy
- Global Direct Procurement Policy
- Global Indirect Procurement Policy

CONTACT

Your Local Contact or the Global Department of the Function(s) below:

- Compliance
- Procurement
- To report concerns please see the section "We Speak Up".

DEMONSTRATE FINANCIAL INTEGRITY

We believe that financial integrity is vital to protect our stakeholders' interests, including the ones of our investors and employees.

OUR PLEDGE

1.3.1 We maintain robust accounting procedures to generate and maintain complete, accurate, and timely books, records, and accounts that reflect our activities and Mayoly's financial position.

1.3.2 We ensure our books and records do not mislead investors, authorities, and employees.

1.3.3 We clearly define the roles and responsibilities within our accounting and financial processes. We ensure segregation of duties for high-risk transactions.

1.3.4 We implement adequate internal controls to prevent and timely detect any false, artificial, or misleading entries in our books and records.

1.3.5 We do not maintain any unrecorded or "off-the-books" funds, assets, or liabilities.

1.3.6 We refrain from taking any actions intended to fraudulently induce, coerce, manipulate, or mislead any auditor engaged in auditing Mayoly's financial statements, and provide complete, accurate, and timely responses to internal and external auditors who evaluate our financial statements.

1.3.7 We fulfil our role as a responsible corporate organization by paying taxes in the jurisdictions in which we operate.

1.3.8 We comply with all applicable laws, regulations, and codes on money laundering, insider trading and the sale and purchase of securities.

Q&A

As the financial year-end approaches, **can I hold the books open after the end of the accounting period in order to accumulate more sales?**
This would allow me to achieve my bonus target for this year by recognizing these sales earlier.

No, we must adhere to standard accounting principles which require that all transactions be recorded in the period they occur. This means we cannot keep the accounting books open after the financial year-end for the purpose of recognizing the sales earlier. All sales and expenses must be timely recorded in the appropriate fiscal period to reflect accurately the activities and performance of the company. Additionally, manipulating the timing and recognition of sales to influence bonus calculations is not permitted, as it compromises the integrity of our financial reporting and performance metrics.

REFERENCES

→ Anticorruption Policy

CONTACT

Your Local Contact or the Global Department of the Function(s) below:

→ Finance
→ Compliance
→ To report concerns please see the section “We Speak Up”.

CHAMPION FAIR COMPETITION

We believe that a level playing field in which all companies freely and fairly compete fosters innovation, drives quality, expands consumer's and patients' choice, and ultimately benefits them and the healthcare system.

OUR PLEDGE

1.4.1 We adhere to all relevant antitrust and competition laws, regulations, and codes.

1.4.2 We compete solely on the merits of our products and services.

1.4.3 We refrain from discussing or colluding with competitors on any pricing, discounts, marketing strategies (e.g., market allocation), access, medical strategies, research, terms and conditions, customer data, costs, or any other confidential or commercially sensitive information.

1.4.4 We exercise utmost caution in our communications during industry association meetings, conferences, and any other interactions with competitors.

1.4.5 We treat our customers, suppliers, and distributors with fairness and integrity, we do not impose illegal restrictions on them.

1.4.6 We never engage in the disparagement of our competitors.

1.4.7 We abstain from engaging in any boycotts or other abusive practices.

1.4.8 We do not abuse our market position (e.g., through abusive conditions agreement, bundling, etc.).

Q&A

What should I do if I attend a trade association meeting and overhear several members discussing their pricing strategy?

In such a situation, you refrain from participating in the conversation. Instead, you raise an objection and ensure your objection is documented in the meeting minutes. If your objection is not acknowledged, you promptly leave the meeting and notify both Compliance and Legal. However, if the objection is recognized and the meeting continues with other agenda items, you may choose to remain present. Nevertheless, you make it a priority to inform Compliance and Legal either after the meeting or during a break. It's crucial to understand that discussing pricing matters with competitors can be considered as price fixing, carrying severe legal ramifications including jail sentences, substantial fines, and significant reputational damage.

REFERENCES

→ Antitrust Policy

CONTACT

Your Local Contact or the Global Department of the Function(s) below:

→ Legal
→ Compliance
→ To report concerns please see the section "We Speak Up".

RESPECT PRIVACY

All employees and third parties with whom we interact (e.g., consumers, patients, healthcare professionals, health stakeholders, suppliers) are entitled to their privacy as protected by the applicable data protection laws. We prioritize the privacy and data security of all individuals we engage with.

OUR PLEDGE

1.5.1 We adhere to all applicable privacy and data protection laws, regulations, and standards.

1.5.2 We collect and process personal data fairly, lawfully, and solely for specified, explicit, and legitimate purposes relevant to its collection and processing.

1.5.3 We retain data only for the duration necessary to fulfill these purposes.

1.5.4 We respect individuals' rights concerning their personal data, including the rights to access, rectify, and erase their information. Additionally, we honour rights related to processing restrictions and objections, notification, data portability, and protection against automated decision-making.

1.5.5 We inform individuals about their privacy rights, facilitate the exercise of these rights, and promptly respond to requests.

1.5.6 We only disclose personal data to trusted third parties or transfer them to authorized countries in compliance with applicable laws. In cases where countries lack authorization, contractual measures are implemented to safeguard the data.

1.5.7 We protect personal information against unauthorized use, inadvertent disclosure, damage, loss, and theft.

1.5.8 We actively detect and manage security and privacy events such as cyberattacks, personal data breaches and data subject rights requests, ensuring relevant parties are informed and supported. In the event of a data breach, our breach procedure promptly mitigates and addresses any potential damages with urgency and efficiency.

1.5.9 We increase general awareness through education and communication to reinforce our culture of privacy and information protection, making us more resilient to security threats.

Q&A

A representative from one of our suppliers contacted me to request the personal email address of one of our quality managers. The representative mentioned knowing each other from their golf club.

Can I disclose the email address to the representative?

No, it is essential to maintain strict confidentiality regarding all employees' personal data. However, you can inform the quality manager about the request and allow him to decide whether he wishes to share his email address with the representative or prefer direct contact.

REFERENCES

- Global SOP Data breach management
- Global SOP Subject Request Access Handling

CONTACT

Your Local Contact or the Global Department of the Function(s) below:

- Data Protection Officer (rgpd@mayoly.com)
- Legal & Compliance
- To report concerns please see the section "We Speak Up".

ENSURE PRODUCT QUALITY AND SAFETY

We embrace a culture of quality, regulatory and safety compliance for our products, services, and processes, prioritizing the protection of patients and consumers and committing to safeguard their health and safety. It is paramount to earn and sustain trust in our products.

OUR PLEDGE

1.6.1 We adhere to good manufacturing practices, good distribution practices, good clinical practices, good vigilance practices, and other local applicable requirements to develop, manufacture, transport and deliver high-quality, safe, and effective products and services.

1.6.2 We perform regular audits of Mayoly supply chain, including industrial sites, suppliers, transporters, and other business partners to ensure that only products that meet our high-quality standards are delivered.

1.6.3 We ensure patients' and consumers' safety by identifying, assessing, and managing any product-related risks in a timely manner.

1.6.4 We comply with all relevant laws, regulations, and codes pertaining to quality, vigilance (e.g., pharma materio-, nutri- and cosmetovigilance), adverse event reporting, and handling of product complaints.

1.6.5 We promptly report, monitor, and evaluate adverse events or special situations (e.g., off label uses, medication errors, misuses, overdoses, administration during pregnancy…) associated with our marketed and investigational products, implementing risk mitigation measures according to applicable requirements.

1.6.6 We guarantee a positive benefit/risk balance for our products, transparently and routinely communicate updated information about the safety and efficacy of our products and services throughout their lifecycle.

1.6.7 We take note of questions and claims relating to our products, so that we can constantly enhance our quality and safety standards.

1.6.8 We ensure that responses to information requests from consumers, patients and healthcare professionals are timely, truthful, evidence-based, and balanced to support the informed and appropriate use of Mayoly's products.

Q&A

My hairdresser is also a patient using a Mayoly product. During my last visit, he mentioned that our product is likely causing him headaches and dizziness, although he's uncertain if it's genuinely linked to our product. **Should I report it anyway?**

Yes, as a Mayoly employee, you must promptly report any adverse events or medical incidents associated with any of our products when you become aware of them, regardless of the context, following the applicable internal procedures.

REFERENCES

- MS-PG-PV-0040: Vigilance continuity plan
- MS-PG-PV-0040: Management of spontaneous cases at global level
- Quality policies, manuals and procedures

CONTACT

Your Local Contact or the Global Department of the Function(s) below:

- Pharmacovigilance, Medical Device Vigilance, Nutritional Product Vigilance, Cosmetovigilance
- Quality
- Regulatory
- Medical
- To report concerns please see the section "We Speak Up".

PROMOTE AND INTERACT WITH OUR HEALTH STAKEHOLDERS RESPONSIBLY

We engage diverse external stakeholders in numerous ways to develop, promote and distribute products that improve well-being, health and quality of life. This includes consumers' and consumers' organizations, patients and patient organizations, caregivers, healthcare professionals, pharmacists, healthcare organizations, payers, and government officials, among others (collectively referred to as «Stakeholders").

We commit to conduct our interactions in a trustful manner with respect, fairness, honesty, and transparency, avoiding deceptive practices and potential conflicts of interest with our Stakeholders.

OUR PLEDGE

1.7.1 We only interact with Stakeholders when there is a legitimate and bona fide scientific or business need, always aligned with the best interest of consumers and patients.

1.7.2 We support education to our Stakeholders, from health to well-being.

1.7.3 We promote the responsible, safe, and effective use of all our products (e.g., usage within the marketing authorization for our medicines and medical devices).

1.7.4 We promote our products in a transparent manner and avoid any type of disguised promotion (e.g., influencers not declaring Mayoly's sponsorship in a post)

1.7.5 We provide Stakeholders with reliable product information to ensure their proper and safe use, i.e., factual, objective, accurate, timely, updated and evidence-based information. We prohibit misleading information that could impair their behaviours and decisions.

1.7.6 We approve promotional materials before usage according to the applicable Mayoly procedures.

1.7.7 We seek our Stakeholders' recommendations or insights to better align our activities with their best interest.

1.7.8 We preserve their independence and autonomy and commit to proactively detecting, avoiding and/or mitigating conflicts of interest that may emerge during Mayoly's interactions with Stakeholders.

1.7.9 We do not utilize gifts, sponsorships, grants, donations, hospitality, contracted services, or anything of value to inappropriately influence Stakeholders' behaviours and decisions, for example related to product prescriptions or recommendations, pricing, tenders, therapeutic guidelines, products safety assessment, etc.

1.7.10 We ensure that our interactions with Stakeholders are transparent and reflected in written agreements, and timely disclosed according to applicable regulations.

Q&A

I would like to contract with a pharmacist to write a promotional article about our new dermo cosmetics product, emphasizing its ground-breaking efficacy. Subsequently, I will submit it as an independent scientific article to a local dermatology monthly magazine, without disclosing the promotional nature of the article. This article will greatly support our commercial launch.

Is this acceptable?

No. When a company like Mayoly pays for or otherwise arranges the publication of product-related material in magazines as part of a promotional effort, such material must clearly indicate its promotional nature, Mayoly's involvement and should not be presented as an independent editorial piece. It should be treated as promotional content, approved internally as such, and its promotional intent should be transparent to the magazine staff and the readers.

REFERENCES

- Anticorruption Policy
- Fee for Service with Healthcare Stakeholders SOP
- Gifts, hospitality and entertainment activities SOP

CONTACT

Your Local Contact or the Global Department of the Function(s) below:

- Medical
- Regulatory Affairs
- Compliance
- To report concerns please see the section "We Speak Up".

PREVENT CONFLICTS OF INTERESTS

Mayoly expects its employees to take decisions based on what is best for the company and the well-being of patients and consumers, and not for their personal benefit.

OUR PLEDGE

2.1.1 As employees, we actively avoid any conflict-of-interest situations where our financial, political, or personal interests, of our relatives, or friends, as well as our external commitments and relationships, may conflict, or appear to conflict, with those of Mayoly.

2.1.2 Conflicts of interest can potentially influence our ability to act in the best interest of the company, of patients and of other stakeholders and can seriously damage Mayoly's reputation and have consequences for the individuals involved.

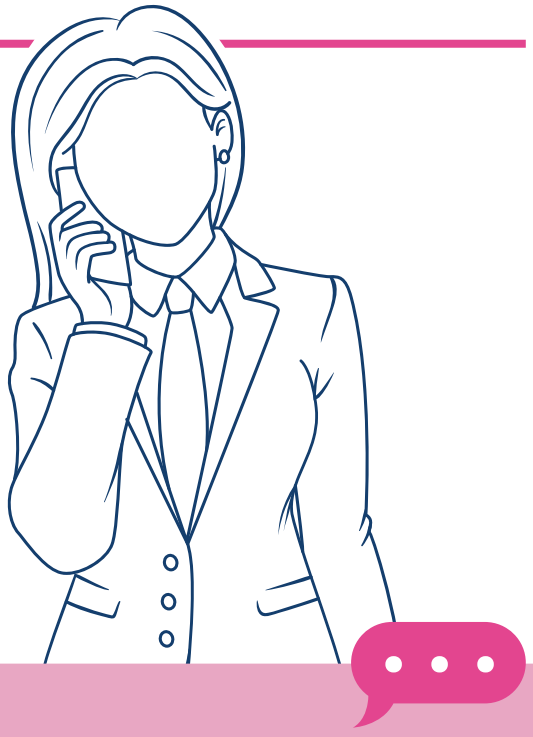
2.1.3 We make decisions which are rooted in what is best for Mayoly and our patients and consumers.

2.1.4 We are responsible for identifying and transparently disclose any situations that may present potential or actual conflict of interest, or even give the appearance of one. Failure to properly identify, disclose, and manage conflicts of interest can significantly jeopardize the integrity of our decision, which is unacceptable at Mayoly.

2.1.5 We refrain from leveraging our positions within Mayoly for personal gain or the benefit of our friends or relatives. We do not accept or solicit any fees, compensation, gifts, hospitality, entertainment, services, or anything else of value that may compromise our judgment when acting in the best interest of Mayoly.

2.1.6 To prevent conflicts of interest, we avoid situations in which the objectivity of a business decision may be impaired, or may reasonably appear to be impaired, for example when personally investing in a competitor, supplier, or customer, or when doing business with a company managed by a family member or when taking a second job or accepting board membership in another company being a direct competitor.

Q&A



My sister holds an ownership interest in an advertising company that Mayoly is contemplating using. While I do not hold any decision-making responsibilities regarding vendor selection,

Should I still report this information?

Yes, it is essential to report this potential conflict. Even the appearance of a conflict could tarnish your reputation or that of the company. Therefore, you must disclose this situation to your immediate supervisor, Human Resources, Compliance, or through the reporting channels mentioned in this code.

REFERENCES

→ Global Indirect Procurement policy

CONTACT

Your Local Contact or the Global Department of the Function(s) below:

→ Compliance
→ Human Resources
→ To report concerns please see the section “We Speak Up”.

PROTECT OUR COMPANY'S ASSET

We foster a culture of business integrity with zero tolerance for any type of fraud as it impacts our reputation, our performance and shareholder value, and ultimately weakens the confidence of our stakeholders (customers, investors, employees, commercial partners, etc.).

OUR PLEDGE

2.2.1 We unequivocally reject all forms of fraud compromising Mayoly's assets and reputation. Some examples include:

- Collusion with a third party (customer, supplier).
- Issuing false invoices, including false information in any invoice.
- Fraudulent bank transfers.
- Asking for, or accepting, reimbursement for non-existent expenses.
- Falsifying documents.
- Theft of confidential information or documents belonging to Mayoly.
- Revealing Mayoly confidential information to a third party without taking the necessary preventive measures (e.g., non-disclosure agreement dully signed prior to the revealing act).
- Hacking and other similar activities and conduct.

2.2.2 We safeguard the integrity and security of our financial and physical assets by implementing adequate internal controls to prevent and timely detect assets misappropriation or damage.

2.2.3 We comply with relevant procurement and commercial policies to prevent or detect any risk of collusion with suppliers and customers.

2.2.4 We do not utilize Mayoly's property or services for personal benefit, except those provided for this purpose (e.g. company car).

2.2.5 We require that our electronic and physical assets, resources, intellectual property, and confidential information are treated, used, and stored in a responsible and safe manner.

2.2.6 We protect all sensitive confidential financial or non-financial information and business secrets, taking all reasonable steps against loss or theft, as well as from unauthorized access, unlawful disclosure, copying, use, or modification, including from a cybersecurity perspective.

2.2.7 We refrain from disclosing confidential information to others or using it in any manner other than for the original purpose for which it was communicated or acquired.

2.2.8 We are responsible for ensuring that company records are maintained, used, transferred, and disposed of according to our data retention policy.

2.2.9 We protect our intellectual property through copyrights, patents, trademarks, and trade secrets, covering materials, data, plans, and ideas generated in research and development, product and package designs, brand names and logos, business processes, and employee and client lists. These allow us to lawfully restrict or prevent others from using our intellectual property without permission.

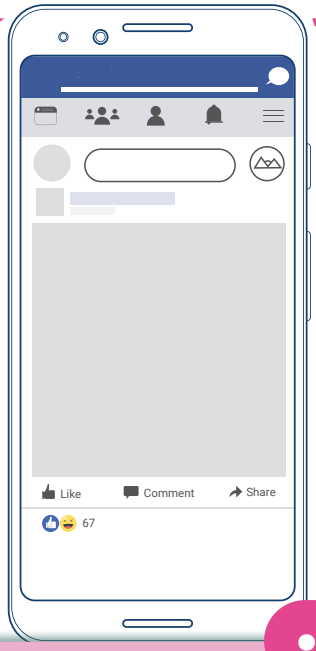
2.2.10 We respect the intellectual property rights of others and refrain from copying or misappropriating the intellectual property of others.

2.2.11 We rely upon expert legal advice, and we implement processes to ensure adequate management and protection of intellectual property and confidential information, ensuring compliance with legal and contractual obligations.

2.2.12 We immediately report any suspected incidents involving fraud, accidental disclosure, loss, accidental deletion, or any potential compromise of the security, integrity, availability, or confidentiality of our assets and information.

2.2.13 Our reputation (corporate and trademarks) is among the most valuable assets of Mayoly. Mayoly is in the only one entitled to use the Mayoly corporate trademarks as owner of such trademarks. We pay great attention to the protection and defence of our reputation and trademarks worldwide.

Q&A



I recently came across a discussion on Facebook where a wholesaler is openly sharing details about a new confidential distribution strategy of Mayoly.

What steps should I take in this situation?

Upon discovering such unauthorized disclosure of Mayoly's confidential information, you promptly escalate the matter to Legal. It is your responsibility to uphold the confidentiality of Mayoly's proprietary information and take appropriate action to safeguard it from unauthorized disclosure or misuse.

REFERENCES

→ Global Indirect Procurement policy

CONTACT

Your Local Contact or the Global Department of the Function(s) below:

→ Finance
→ Legal
→ Compliance
→ IT
→ To report concerns please see the section "We Speak Up".

COMMUNICATE RESPONSIBLY

We firmly believe that maintaining a strong image and reputation is paramount to Mayoly's success. These vital assets depend on the behaviour of each of us and how we communicate externally.

OUR PLEDGE

2.3.1 We hold individuals accountable for external communications related to Mayoly, ensuring they are conducted in a responsible manner that consistently protects Mayoly's image and reputation.

2.3.2 We maintain a zero-tolerance policy towards the inappropriate use of communication channels (including social media), recognizing the potential risks they pose to Mayoly's confidential information, proprietary data, and our image and reputation.

2.3.3 In particular, we never:

- speak on Mayoly's behalf without proper authorization,
- disclose confidential information,
- discuss Mayoly's products or molecules without proper authorization.

2.3.4 We appoint authorised employees who are the only ones entitled to communicate on behalf of Mayoly about the company's activities and products.

2.3.5 We engage with traditional media, social media, and the internet in a responsible, fair, objective, timely and respectful manner, in alignment with industry standards and applicable regulations, including good promotional practices when applicable.

2.3.6 We ensure our Stakeholders can easily identify that an information is issued by Mayoly, especially when published by a business partner on our behalf.

2.3.7 We answer questions by the media on Mayoly's name and behalf, only if we are authorized to do so. If not, we must refer all media questions to Corporate Communications.

2.3.8 Mayoly respects the personal views of its personnel, but such views must be expressed solely in an individual capacity and never on behalf of nor be associated to Mayoly, applying good judgement as regards to what is appropriate in tone and content.

Q&A

Following our recent productive meeting with the sales team, I captured several images of our team.

Am I permitted to share these photos on my personal TikTok account?

No. Posting pictures from company meetings is problematic. Sharing such photos poses the risk of inadvertently disclosing confidential or strategic information and may lead to accusations of improper product promotion. Furthermore, sharing images without obtaining consent from all individuals featured could potentially violate their privacy rights.

CONTACT

Your Local Contact or the Global Department of the Function(s) below:

- Corporate Communications
- To report concerns please see the section “We Speak Up”.

CARING FOR OUR PEOPLE AND OUR WORLD

MAYOLY's mission is also to improve the quality of life for its employees and everyone we serve, such as patients and consumers, and to contribute to the economic, social, and environmental development of the communities, regions, and countries where we operate.

We are committed to making a positive impact on individuals, communities, and the environment. This is why our sustainable development strategy is based on three fundamental pillars:

- **The social pillar focuses on our commitments to our teams.**
- **The societal pillar focuses on our commitments to healthcare partners and the general public.**
- **The environmental pillar focuses on actions towards ecosystems and communities.**
- **These commitments lie at the heart of everything we do and drive every decision we make.**

EMBODY DIVERSITY, EQUITY, AND INCLUSION

We embody diversity and respect as fundamental values of our company culture, and we are dedicated to fostering and preserving them within our workplace and broader community. We believe that embracing a diverse workforce, in a respectful working environment will provide us with the plurality of standpoints of all our stakeholders and allow us to better understand, anticipate and meet their needs. It ultimately drives our success as a global company.

OUR PLEDGE

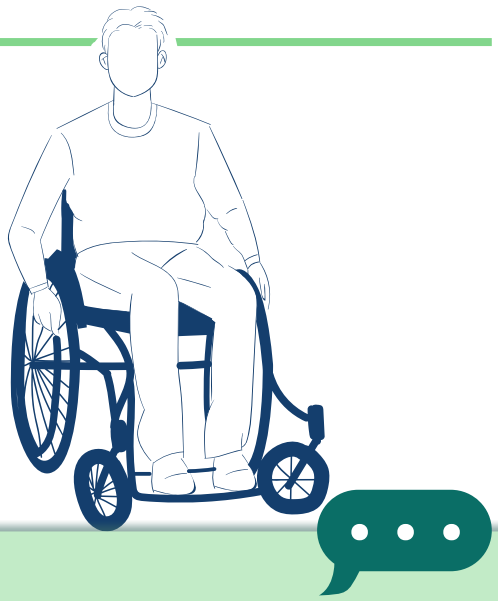
3.1.1 We adhere to all laws, regulations, and codes pertaining to equality, diversity, inclusion that protect diversity in terms of race, colour, religion, nationality, age, sex, gender, sexual orientation, disability, appearance, genetics, medical history, marital status, pregnancy, parenthood, political affiliation, union membership, or any other legally protected characteristic.

3.1.2 We pledge to provide equal treatment and opportunities for all Mayoly personnel, encompassing recruitment, employment conditions, pay, professional development and training, and career advancement, based on transparent, objective, and equitable criteria.

3.1.3 We encourage open and respectful communication among employees to foster understanding and collaboration among diverse teams.

3.1.4 We commit to career development and opportunities that are open to our diverse force and we do not accept any biais in our recruitment and talent management processes.

3.1.5 When it is relevant, we set measurable diversity, equity and inclusion goals and conduct reviews to track progress and hold ourselves accountable for achieving them.



What is an example of an inclusive workplace action for people with disabilities?

We can make the workplace more accessible, for example, by ensuring physical accessibility (e.g., ramps, elevators, adjustable desks), providing assistive technologies (e.g., screen readers, voice recognition software), and implementing flexible work arrangements such as remote work or adjustable schedules.

REFERENCES

- Diversity, Equity and Inclusion Policy

CONTACT

Your Local Contact or the Global Department of the Function(s) below:

- Human Resources
- Compliance
- Local Disability Representative
- To report concerns please see the section “We Speak Up”.

PROMOTE RESPECT & REJECT HARASSMENT AND DISCRIMINATION

We cultivate a safe workplace environment that unequivocally rejects all forms of harassment or discrimination, or even the appearance of harassment or discrimination.

OUR PLEDGE

3.2.1 We adhere to all laws, regulations, and codes pertaining to the prohibition of discrimination and harassment.

3.2.2 We unequivocally prohibit all forms of harassment or discrimination, or even the appearance of harassment or discrimination within our workplace and broader community, based on race, colour, religion, nationality, age, sex, gender, sexual orientation, disability, appearance, genetics, medical history, marital status, pregnancy, parenthood, political affiliation, union membership, or any other legally protected characteristic.

3.2.3 We vehemently reject the use of stereotypes, jokes, or any other form of behaviour and communication, whether verbal, written, or physical, that even remotely hints at harassment or discrimination.

3.2.4 We prohibit any conduct that may negatively affect a person's dignity.

Q&A

I've observed that one of my direct reports, aged 59 and having served Mayoly for many years, is experiencing performance issues. There's been a notable decline in his ability to deliver results, often missing project deadlines.

Can I suggest to him that he's earned "a day in the sun" after years of hard work and should consider retirement?

No, that would involve relying on an impermissible stereotype, assuming the employee's performance problems stem from his age. Instead, you should offer direct feedback and coaching to address the specific nature of his performance issues.

REFERENCES

- Diversity, Equity and Inclusion Policy

CONTACT

Your Local Contact or the Global Department of the Function(s) below:

- Human Resources
- Compliance
- To report concerns please see the section "We Speak Up".

ENSURE SAFETY AND WELL-BEING IN THE WORKPLACE

We foster a healthy and safe workplace, committed to the well-being of everyone in the working environment, both physically and psychologically, to unlock the best potential of our people.

OUR PLEDGE

3.3.1 We prioritize the care of our people, integrating health and safety principles into every aspect of our business and organization.

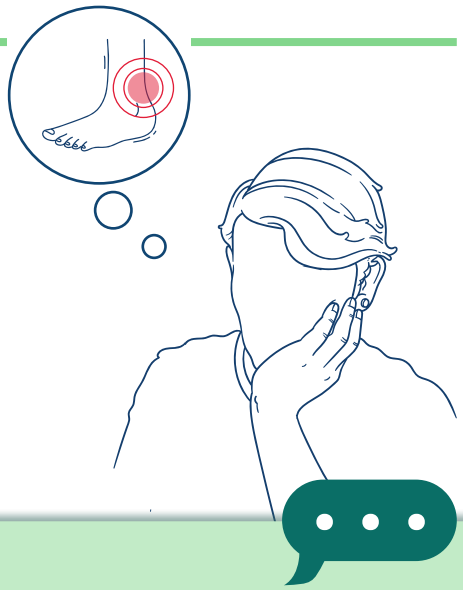
3.3.2 All facilities are designed and maintained to ensure the utmost safety and welfare for our workers.

3.3.3 We strictly adhere to all relevant health and safety laws, regulations, and codes to guarantee the safety and well-being of our employees.

3.3.4 We take proactive measures to mitigate risks and ensure that neither ourselves nor others are endangered by our actions. Therefore, we assume responsibility for maintaining an incident-free workplace, striving for a zero-incident environment throughout the organization.

3.3.5 We promptly report any actual or potential accidents or concerns related to security, environment, health, and safety to the Health & Safety Officer.

Q&A



I tripped in the office hallway and injured my ankle. Fortunately, the injury seems minor, and I expect it to heal on its own. However, I'm concerned about the perception of office safety.
Should I still report it?

Yes, it's necessary to report the incident. At Mayoly, all workplace accidents must be reported, regardless of the severity of the injury. These reports are essential for monitoring any potential health implications and identifying hazardous conditions that need correction to prevent more serious accidents. Prompt reporting ensures that Mayoly maintains a safe working environment for all employees.

REFERENCES

- Environment Health and Safety commitment 2022-2030

CONTACT

Your Local Contact or the Global Department of the Function(s) below:

- Human Resources
- Environment, Health & Safety
- Senior Director

To report concerns please see the section "We Speak Up".

RESPECT HUMAN RIGHTS

Our purpose is to increase our commitment to society and to keep on generating long-term value for shareholders. On top of caring for our employees, dealing ethically with our subcontractors, we collaborate fairly with local communities so that everyone involved in our value chain, directly or indirectly, be treated fairly.

OUR PLEDGE

3.4.1 We respect the human rights of our workers and adhere to all relevant human rights and labor-related conventions, laws, regulations, and codes.

3.4.2 We promote the right of workers to freedom of association and collective bargaining, as stipulated by applicable laws and regulations.

3.4.3 We maintain a workplace environment that prohibits corporal punishment, force, psychological, physical, or economic coercion, as well as verbal abuse or threats.

3.4.4 We actively prevent and abstain from engaging in illegal, clandestine, and undeclared employment practices.

3.4.5 We refrain from subjecting workers to any labor that may have significant adverse physical, psychological, social, or moral effects.

3.4.6 We categorically reject involvement in any form of forced labor, including slavery, labor under physical or psychological duress, and human trafficking, under any circumstances.

3.4.7 We ensure fair wages that meet or exceed the minimum salary requirements set by local laws, regulations, and codes, enabling workers and their families to live with dignity.

3.4.8 We adhere to regular wage payments, not less than monthly, compensate workers for overtime hours at legal rates, and fulfil all legal obligations regarding worker benefits.

3.4.9 We provide employees with written employment contracts in a language they understand, detailing key terms and rights, wage calculations, and leave entitlements.

3.4.10 We do not confiscate or destroy workers' passports, driving licenses, immigration documents, or other identity papers.

3.4.11 We refrain from employing or contracting children below the minimum working age specified by local laws, regulations, or codes.

3.4.12 We expect our partners to apply the same human rights standards with their employees and contractors as we do for our employees.

3.4.13 We diligently select our suppliers prioritizing those who adhere and commit to comply with all relevant human rights and labor-related conventions, laws, regulations, and codes.

3.4.14 We listen to the communities where we operate to support ethical decision-making.

3.4.15 We respect the land rights, customs, culture, and religion of local peoples in the areas where we operate.

3.4.16 We engage in diverse initiatives spanning sports, education, culture, and charitable endeavours, offering financial support or direct participation to contribute positively to society.

3.4.17 When our products require it, we implement processes to ensure responsible natural and mineral sourcing, avoiding minerals or substances that finance or benefit armed groups or perpetrate serious human rights abuses.

3.4.18 We ensure our commitments to society deliver tangible impact with proper measurement and public reporting according to applicable regulations.

Q&A

As an employee, I've noticed that our cleaning service supplier seems to be engaging workers without contracts and underpaying them.

What should I do?

At Mayoly, we take human rights violations very seriously, including issues related to employment practices of our suppliers. You must report this matter immediately through our designated reporting channels. We will investigate the situation promptly and take appropriate action to address any violations of labor laws or ethical standards by our cleaning service supplier. Your vigilance helps ensure that we maintain integrity and uphold human rights throughout our operations and supply chain.

REFERENCES

→ Human Rights Policy

CONTACT

Your Local Contact or the Global Department of the Function(s) below:

→ Procurement
→ Human Resources
→ Corporate Social Responsibility
→ To report concerns please see the section "We Speak Up".

PROTECT THE ENVIRONMENT

As a global organization having a material environmental footprint, we are responsible for taking actions that continuously reduce the consequences of our activities on the planet for today and for future generations.

OUR PLEDGE

3.1.1 We adhere to all relevant environmental laws, regulations, and codes wherever we operate.

3.1.2 We have integrated Environment-Social-Governance (ESG) criteria into our mission and strategy to acknowledge our environmental impact and societal role.

3.1.3 We aim at mastering our consumption and the use of natural resources. This includes:

- Reducing our waste and increasing the proportion of waste recycled.
- Incentivizing employees of successful initiatives to reduce industrial waste
- Reducing our water and energy consumption for the manufacturing of our products.

3.1.4 We are committed to combat climate change, particularly through our Science Based Target Initiative commitment to reducing our emissions. We will also increase our use of renewable energies and monitor and minimise the impact of our products throughout our value chain.

3.1.5 We aim at preserving the environment and biodiversity through engaging our suppliers in our CSR initiatives, achieving, or even surpassing, by 2030 the objectives outlined in our biodiversity roadmap.

3.1.6 We will also certify environmental management, energy performance, and compliance with health, safety, and quality of life standards across all our production sites.

Q&A

When selecting a supplier for a new material, the cheapest supplier is not willing to provide me with any tangible information related to its environmental impact, strategy and program.
Shall I take this into account in the final decision?

Yes, in line with our purchasing policy, you must consider various factors before finalizing your order, including the environmental impact of these goods and their ability to be recycled. Protecting the environment and biodiversity is paramount to our company because it aligns with our core values and long-term sustainability objectives. By protecting the environment, we demonstrate our commitment to future generations, mitigate environmental risks, and contribute to a healthier planet. Additionally, it enhances our reputation as a responsible corporate citizen and fosters positive relationships with stakeholders who prioritize environmental stewardship.

REFERENCES

- Sustainability Policy
- Sustainable Procurement Charter

CONTACT

Your Local Contact or the Global Department of the Function(s) below:

- Procurement
- Corporate Social Responsibility
- To report concerns please see the section “We Speak Up”.

We are proud to improve
the health and well-being of everyone,
to make everyday life better for all.

mayoly.com
Follow us