



B Lab Statement on Sanofi Consumer Healthcare GERMANY - B Corp Requirements for Pharmaceutical Companies

B Lab's independent Standards Advisory Council has rendered the following decision and guidance regarding eligibility for B Corp Certification for companies in the pharmaceutical industry:

"B Lab and its independent Standards Advisory Council have determined that pharmaceutical companies are eligible for B Corp Certification if they have not engaged in specific prohibited practices in the last five years AND are meeting additional industry-specific practice requirements outlined below."

Sanofi Consumer Healthcare GERMANY is required to disclose a summary of how it complies with these industry requirements as a part of its B Corp Certification. For more information on the specific requirements, please refer to B Lab's position statement on Pharmaceutical Companies [here](#).

About Sanofi Consumer Healthcare GERMANY

Sanofi Consumer Healthcare GERMANY is a business of Sanofi's global consumer healthcare organization, one of Sanofi Group's four business units, and is structured as an independent company and subsidiary. Its portfolio spans mainly four categories – Pain, Cough & Cold, Digestive Wellness and Allergy and includes brands like Thomapyrin®, Mucosolvan®, Dulcolax®, Buscopan® and Allegra®. Approximately 96.06% of the business's annual revenue comes from non-prescription products (including pharmacy-exclusive medical devices). 3.94 % of revenue stems from prescription products.

In 2023, Sanofi Consumer Healthcare GERMANY employs 808 people and provides manufacturing, regulatory, medical (including medical information), quality, and pharmacovigilance oversight as well as sales, and marketing activities for its products in the German market. The company has a manufacturing site in Cologne and offices in Frankfurt, managing the business including externalized distribution activities. Both sites are licensed Good Manufacturing Practice (GMP) and Good Distribution Practices (GDP) Sites.

Sanofi Consumer Healthcare GERMANY's Disclosure on Prohibited Practices

Pharmaceutical companies engaged in the following practices in the last five years, as demonstrated through company disclosures or through material, justified, and unresolved stakeholder concerns, are currently ineligible for B Corp Certification:

- *Companies engaged in any form of lobbying or policy advocacy that endanger consumer safety, promote an anti-competitive environment (e.g. by opposing increased*



transparency measures), inhibit affordable pricing, or limit equitable access to medicine. This includes membership, Board involvement, or funding of industry associations that engage in such lobbying activities.

- o Companies utilizing intellectual property strategies for branded products to influence an unjustified delay to the introduction of an authorized generic product to the market (e.g. “evergreening” patents).*
- o Companies engaged in price gouging as evidenced by significant and unjustified year-over-year price increases to their products.*

Sanofi Consumer Healthcare GERMANY has been reviewed in accordance with B Corp Certification’s Disclosure Questionnaire and background check requirements, including disclosure of its involvement in lobbying and advocacy activities, intellectual property strategies, and price changes in order to verify it is meeting the above requirements regarding prohibited industry practices. The company’s approach to managing these material topics in the industry is further detailed below.

Sanofi Consumer Healthcare GERMANY’s Disclosure on Required Best Practices

- 1. Adherence to credible national and/or international standards of safety, quality, and efficacy covering all relevant stages of the drug life cycle (i.e. drug development, supply chain, manufacturing, and distribution), which should include explicit systems to manage the risk of substandard medicines.*

All products of Sanofi Consumer Healthcare GERMANY are produced in accordance with all relevant German and European laws, regulations, and standards.

All Facilities of Sanofi Consumer Healthcare GERMANY (manufacturing sites, distribution centers and commercial activities) are monitored by the relevant regulatory bodies and regularly inspected by the competent authorities (such as BfArM - Bundesinstitut für Arzneimittel und Medizinprodukte, Hessisches Landesamt für Gesundheit und Pflege, Bezirksregierung Köln) to confirm the quality, efficacy, and safety of its products and compliance with applicable regulations.

All company manufacturing sites are certified GMP sites and operate quality management systems in line with the ICH Quality Guideline Q10 on the Pharmaceutical Quality System.

To maintain the quality, efficacy, and safety of products, Sanofi Consumer Healthcare GERMANY collects, manages, submits, when relevant, and monitors pharmacovigilance cases, quality complaints & medical inquiries. Any trends are assessed, and appropriate actions are taken to adjust the benefit-risk profile of products where necessary.

- 2. A Code of Ethics and/or other policies applicable to all company employees and critical third parties that establish minimum expectations with regard to anti-corruption and bribery, lobbying and advocacy activities, company interactions with healthcare professionals/organizations, and ethical marketing (where applicable). The company must*



also have clear processes to enforce the Code, including an accessible whistleblowing channel, and regular training of staff and third parties on the Code.

Sanofi Consumer Healthcare GERMANY follows all applicable laws and regulations, overarching industry and Sanofi Group policies and procedures in relation to ethics, anti-corruption, and bribery, lobbying and advocacy, interactions with healthcare organizations/professionals and ethical marketing. Sanofi is generally subject to the strict requirements of the company's Code of Ethics.

Code of Conduct & Training

The company's [Code of Conduct](#) requires all employees and any critical third parties working on behalf of Sanofi and their subsidiaries, to comply with applicable laws and regulations, including anti-bribery and anti-corruption laws, as well as the specific principles and rules of conduct. The Code of Conduct outlines the company's approach to ethics and risk culture to enable employees to make decisions fairly and ethically and ensure ethical business conduct.

Furthermore, Sanofi Consumer Healthcare GERMANY has policies and procedures designed to help ensure that officers, employees, agents, intermediaries, and other third parties comply with applicable laws and regulations. In the German market, this includes but is not limited to the European Federation of Pharmaceutical Industries and Associations (EFPIA) and local pharma code transparency regulations.

Sanofi Consumer Healthcare GERMANY ensures that all relevant employees receive and complete mandatory Ethics & Business Integrity (EBI) training, as part of the onboarding process, annually, as part of refresher training, and on an ad hoc basis as part of disciplinary actions/measures for identified employees, in line with its zero tolerance towards bribery and abuse of power strategy amongst employees, business partners and stakeholders. In Sanofi Consumer Healthcare GERMANY, there are annual audits of EBI policies and procedures by an internal control group and internal audit group. EBI policies and procedures undergo annual external audits as well as by internal auditors.

Suppliers

Sanofi Consumer Healthcare GERMANY conducts risk-based anti-bribery due diligence on their business partners, including suppliers, customers, and third-party sales and marketing intermediaries, before engaging them and periodically during their partnering. Any potential issue raised through this monitoring is reviewed and assessed to evaluate the need for a risk mitigation plan, including termination if required.

Additionally, the [Supplier Code of Conduct](#) is embedded within the code of conduct policy and shared with all suppliers. It is part of the company's responsible procurement approach and a key element of its vigilance plan. Supplier code of conduct commits suppliers and critical third parties working on behalf of Sanofi Consumer Healthcare GERMANY, to strictly observe and comply with all the fundamental principles expressed in all its activities and sites worldwide. Suppliers are also expected to ensure their suppliers comply with the code of conduct requirements, apply its fundamental principles in the areas of human rights, working conditions, environment, and fight against corruption.



Interactions with Healthcare Professionals (HCPs)

All interactions with Healthcare Professionals and organizations follow high ethical standards, policies, and regulations. Sanofi Consumer Healthcare, Germany complies with [Sanofi Group policy](#) on interactions with HCPs as well as regulations from the codes from the local pharma association (FSA - Verein Freiwillige Selbstkontrolle für die Arzneimittelindustrie e. V.) where Sanofi GERMANY has a membership. In Germany, Sanofi CHC GERMANY directly handles the interactions with HCPs based on the framework mentioned before.

Each year, Sanofi Group publicly discloses the transfers of value made to healthcare professionals (among others) based upon the EFPIA and local pharma code transparency regulations in GERMANY. This includes any activities within the scope of Sanofi Consumer Healthcare GERMANY.

Whistleblowing

Sanofi Consumer Healthcare, Germany has established clear procedures and frameworks for employees to raise concerns or beliefs that any law, regulation, policy, or code of conduct has or may be violated. Employees have a duty to raise any concern through the appropriate channel e.g., via Manager, Sanofi Speak Up Line, Ethics & Business Integrity, and People and Culture function.

Promotional practices

As part of a global pharmaceutical company, Sanofi Consumer Healthcare GERMANY adheres to applicable laws and codes on promotional activities (e.g., Advertising laws as well as applicable Sanofi standard operating procedures regarding promotional & non-promotional materials.). The company has released a factsheet on its [promotional activities](#).

Sanofi Consumer Healthcare GERMANY enlists a team from regulatory, medical, legal, and commercial to ensure promotional activities are substantiated and not misleading, in compliance with internal standard operating procedures and applicable laws and regulations, on which all relevant internal stakeholders are trained.

- 3. Public disclosure detailing the company's approach to government affairs, inclusive of lobbying/advocacy and political activities. This should include disclosure of the material issues that the company lobbies/advocates for, their trade associations, and the controls they have in place in regards to political contributions, lobbying/advocacy on the company's behalf, revolving door policy, political contributions and donations.*

Sanofi Consumer Healthcare GERMANY follows Sanofi Group's internal Global Lobbying policies which apply to all Sanofi Group employees and Consultant lobbyists hired around the world. The Sanofi Group conducts direct lobbying activities for all German subsidiaries, including Consumer Healthcare. Only authorized Sanofi employees and hired consultant lobbyists, where permitted, may engage in direct discussions with policymakers on Sanofi's



behalf concerning legislative activity. Sanofi Consumer Healthcare GERMANY is registered in the German Lobby register of German Bundestag ([Link](#)).

Sanofi Group's lobbying activity is governed by internal policies that ensure compliance with relevant German federal and state/provincial laws, regulations, and guidance. Sanofi employees are provided training and compliance with the company's lobbying practices is monitored by the Internal Control & Risk Management Group.

In compliance with German law, Sanofi Group discloses all expenditures related to federal lobbying on a yearly basis. The Sanofi group publishes an annual, public disclosure that outlines the approach to lobbying, requirements for ethical and transparent activity for lobbyists and hired consultants, as well as lobbying expenditures and political contributions, where applicable. It can be found at [Lobbying \(sanofi.com\)](#)

The issues on which Sanofi Consumer Healthcare GERMANY is engaged include broad, equitable access to over-the-counter (OTC) medicines and products; regulatory pathway reform and standards; product quality and safety; supply chain flexibility; and packaging design, including sustainability, recycled content, and waste minimization.

Only authorized Sanofi employees and hired consultant lobbyists may engage in discussions on Sanofi's behalf concerning legislation and rulemaking activity without prior, expressed, and written Sanofi approval.

Per Sanofi Lobbying Policy, all Sanofi authorized employees and consultant lobbyists must ensure that:

- they remain compliant with all applicable laws and regulations;
- lobbying must be done with the purpose of advancing Sanofi's interests;
- they remain honest and transparent concerning whom, and for what, they are lobbying; they shall provide no gifts;
- hospitality must be made in strict compliance with applicable anti-corruption laws and regulations, Sanofi policies, and regulations and other regulations and codes (e.g. internal policies of the lawmaker);
- and any contract with a consultant lobbyist must include a detailed quotation of services, anti-bribery provisions, audit rights of Sanofi, and the consultant lobbyist's commitment to comply with local regulations.

The [Organization for Economic Co-operation and Development \(OECD\) Principles for Transparency and Integrity in Lobbying](#) were also used as a reference in developing our responsible Lobbying policy.

Employees of Sanofi Consumer Healthcare GERMANY, who are not Sanofi Authorized Employees, must not engage in discussions on Sanofi's behalf about legislation, rulemaking, or policy development with Public Decision Makers without prior review and written approval from Sanofi's relevant Public Affairs or Government Relations manager. Information shared must be objective, reliable, accurate, and up-to-date supported by evidence, and must not misrepresent facts.



Trade Associations

Sanofi Consumer Healthcare GERMANY is a member of several trade associations that represent and advocate on behalf of Sanofi Consumer Healthcare GERMANY, and other consumer healthcare companies, on consumer healthcare-related issues aimed at improving the environment for self-care. Trade associations for which Sanofi Consumer Healthcare GERMANY is a member, lobby on behalf of the aggregated industry regarding business practices affecting quality, safety, and access to consumer healthcare products. They do not lobby specifically on behalf of any individual company. Positions taken by the Trade Associations on behalf of the industry as a whole are derived by consensus of the member companies which are then approved by the Trade Associations Board of Directors, on which an executive from Sanofi Consumer Healthcare GERMANY may sit. The CHC industry trade associations that CHC GERMANY participates in are:

- Bundesverband der Arzneimittelhersteller (BAH)
- Lebensmittelverband Deutschland e.V.
- INTEGRITAS e.V. – „Verein für lautere Heilmittelwerbung“

4. For companies involved in research & development, public disclosure of its R&D and intellectual property strategies and disclosure of annual resources invested in both internal and collaborative R&D activities.

R&D activities for Sanofi Consumer Healthcare Germany are focused on two priorities:

1) to develop and deliver innovative new products that meet the expanding needs of its consumers. Developing new products can mean launching new product formats that don't require us to develop new molecules. New formats can be e.g. smaller size packs, new forms like liquids or gels to make products accessible and/or convenient to consumers,

2) to provide the technical support to maintain existing products on the market, including necessary regulatory & pharmacovigilance activities and technical updates/remediation work when needed.

R&D in Consumer Healthcare may also encompass supporting Rx(prescription)-to-OTC "switches". After Rx-use of medicine for several years, certain classifications of drugs may sometimes justify a change in Regulatory classification and move to a non-prescription status. Such Rx-to-OTC switches generally require extensive R&D work and investments to demonstrate the suitability (safety and efficacy) of previously prescription-only products to non-prescription status to make them more easily accessible to the public.

Of the projects currently in development in Sanofi CHC's pipeline:

- 70% of R&D projects are Sanofi CHC initiated and are developed at the Sanofi CHC development centers.
- 30% of R&D projects are Sanofi CHC initiated and are developed at Contract Development and Manufacturing Companies (CDMOs) managed by Sanofi CHC.



- 0% of R&D projects are sourced from the Sanofi group, excluding Sanofi CHC. External companies are mainly CDMO (contract development and manufacturing company)

In 2023, Sanofi CHC began publicly disclosing its spending on R&D. Please find details via this [link](#).

The Company files patent applications based on the innovation and benefit to patients and consumers. Sanofi CHC, as a consumer healthcare business, does not work on the development of new molecules (e.g., active pharmaceutical ingredients). Generally, new medicinal products with new active molecules may only be supplied on prescription. In 2022, approximately less than 5% of Sanofi CHC's products were subject to patents. Internal experts in intellectual property report directly to Sanofi CHC's Chief Legal Officer, who maintains oversight of any intellectual property issues. The Chief Legal Officer is a member of CHC's executive leadership team.

As required by the local health authority, Sanofi Consumer Healthcare GERMANY provides all the necessary information to the patient on how to use the product in a safe and appropriate manner via the leaflet and product packaging; moreover, Sanofi Consumer Healthcare GERMANY offers medical information services on all products.

5. For companies involved in research & development for priority diseases, conditions, and pathogens identified in the Access To Medicine Index, R&D processes for both internal and collaborative R&D activities must include a framework to develop equitable access plans for such projects. Access plans must be project-specific and include detailed commitments and strategies to improve access to such products in low- and middle-income countries (LMICs).

The Access to Medicine Index does not feature any of Sanofi's Consumer Healthcare products or innovations, as they do not have any active R&D projects to address priority diseases, conditions, and pathogens identified in the Access to Medicine Index. Sanofi's Consumer Healthcare products treat low-severity conditions, for which there is in general, a wide range of alternatives.

The Consumer Healthcare division at Sanofi is not expected to meet B Lab's requirement in relation to companies listed on the Access to Medicine Index (ATMI). For reference, in 2022 Sanofi Group achieved a score of 3.47 on the [ATMI](#).

6. For companies involved in sales, public disclosure of its approach to pricing which, at a minimum, utilizes pricing instruments that are generally accepted by public health agencies to set prices in all markets (such as internal reference pricing, external reference pricing, and value-based pricing). Additionally, for sales in LMICs, pricing strategies must prioritize the payer's ability to pay across different segments of a country's population and aim to improve access to those in need.

Sanofi Consumer Healthcare GERMANY deploys Price Pack Architecture strategies that provide consumers with the appropriate selection of products that is based on the economics of what the consumer market will bear. Sanofi Consumer Healthcare GERMANY uses a variety of analytical techniques to develop their Price Pack Architecture such as, but not limited to, price



slope optimization work, competitive benchmarks, conjoint studies, and market research. Furthermore, as Sanofi Consumer Healthcare GERMANY innovates into new product spaces, the company will look to adjacent market segments to benchmark appropriate pricing metrics. The company will also, at times, engage in first party consumer research to determine how to develop meaningful innovation that consumers value.

Sanofi Consumer Healthcare GERMANY does not intervene directly or control the pricing made by the pharmacies /wholesalers in accordance with anti-trust regulations. The final shelf price is ultimately at the sole discretion of the pharmacies /wholesalers.

Sanofi Consumer Healthcare GERMANY's primary distribution channels are stationary pharmacies, e-commerce pharmacies, and wholesalers. Our product portfolio contains almost exclusively products that do not require prescriptions. 3.94% of Sanofi Consumer Healthcare GERMANY's sales come from prescription-only products in Germany. Prices of products that require a prescription are controlled by government regulations ([Arzneimittelpreisverordnung](#)). Sanofi Consumer Healthcare GERMANY does not launch new products that require prescription, therefore also does not deal with new drug pricing.

7. For companies involved in sales, companies have financial incentive structures for sales agents/teams designed to encourage responsible sales practices and minimize the risk of overselling (for example, by decoupling bonuses from sales volume).

As a consumer healthcare company, Sanofi Consumer Healthcare GERMANY's sales team sells to wholesale customers and to pharmacies (stationary and e-commerce) directly. The structure of the consumer health market itself and Sanofi Consumer Healthcare GERMANY's responsible sales practices ensure that there is no risk of overselling. Monthly internal controls of the stock reach in conjunction with the orientation towards external guidelines for a healthy stock range provide further protection. Sanofi Consumer Healthcare GERMANY follows Sanofi Group's internal Sales Incentives policy which includes an addendum specific to 'Sales Incentive Plans for CHC dedicated Sales functions.

Sanofi Consumer Healthcare GERMANY Incentive Plan has in its composition components, such as:

- Financial (e.g., Net Sales),
- Executional (e.g., Distribution,) and,
- External (e.g., Market Share,)

Additionally, Sanofi Consumer Healthcare GERMANY promotes responsible sales practices in various ways including but not limited to, the following.

- **Incentive Structure.** Sanofi Consumer Healthcare GERMANY has financial incentive structures for sales teams that are specific to the sale of consumer products.



Sanofi's Code of Conduct. All sales representatives must undergo, and complete Compliance training related to the company's global policies and Code of Conduct to qualify for any sales incentive bonus.

- **Training:** Sanofi Consumer Healthcare GERMANY has a specific mandatory training process for their sales representatives, and its third parties. All sales representatives must undergo and complete Compliance training with the company's global policies and code of ethics to be able to qualify for any of their sales incentive bonuses.
- **Oversight:** Sanofi Consumer Healthcare GERMANY utilizes a bonus committee to ensure appropriate ethical behavior and operational management is coached on ensuring ethical marketing and CHC GERMANY's various internal control mechanisms are enforced. Additionally, Sanofi CHC GERMANY has an enterprise-wide framework to identify and manage abusive incentive compensation business practices, and regular audit checks are conducted to ensure compliance. The Sanofi Consumer Healthcare GERMANY Sales team utilizes a Customer Relationship Management (CRM) tool for sales visits designed to catch any misconduct, and regular audit checks are conducted to ensure compliant behavior with customers.