

IPSEN

BUSINESS PARTNER

CODE OF CONDUCT

IPSEN COMMITMENT

Ipsen is dedicated to improving patients' lives and firmly committed to our company ethical culture and Social Responsibility (CSR) by supporting its employees and giving back to patients and society, as well as minimizing its impact on the environment. Ethics govern Ipsen's actions and behavior, not only when it comes to providing better care, but throughout all areas of company life. Ipsen acts in an ethical way with patients, healthcare professionals, payers, policy makers, competitors, partners, shareholders, and employees.

The 10 principles of the [United Nations Global Compact](#), to which Ipsen is signatory, are integrated in its own Code of Conduct. Ipsen is a member of the *International Federation of Pharmaceutical Manufacturers and Associations* (IFPMA) and of the *European Federation of Pharmaceutical Industries and Associations* (EFPIA), to contribute to reduce inequalities in health, accelerate patients' access to innovative medicines and improve patient safety..

IPSEN EXPECTATIONS FOR BUSINESS PARTNERS

Ipsen recognizes that its Business Partners play an important role in Ipsen's success and commitments. Accordingly, our company strives to conduct business with individuals and organizations who share Ipsen commitment to ethical culture and operate in a socially and environmentally responsible manner.

This expectation also applies to third parties with whom the Business Partners work to provide goods and services to Ipsen.

Business Partners are expected to train their employees and use a management system to:

- **Implement and comply with this Code of Conduct;**
- **Comply with all applicable international and national laws and regulations ;**
- **Maintain adequate procedures, trainings, controls, and necessary documentation to demonstrate their commitment to compliance and ethical culture.**

USE OF THE BUSINESS PARTNER CODE OF CONDUCT

This Business Partner Code of Conduct documents principles and expectations for establishing and maintaining a business relationship with Ipsen partners.

Ipsen reserves the right to not enter or to discontinue a relationship with a Business Partner whose practices would not meet its business ethics principles and/or would not comply with all applicable laws and regulations.

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HUMAN RIGHTS AND LABOR

Business Partners shall uphold the human rights of workers and treat workers with dignity and respect. They are expected to comply with international human rights treaties (with the International Labor Organization), without prejudice to more favorable national laws.

— Child Labor and Young Workers

Business Partners shall not engage or support any forms of child labor, not employ a person under the age of 15 (or under the legal age for finishing compulsory schooling) or person under the age of 18 for hazardous and night work.

— Free Chosen Employment

Business Partners shall not use forced, bonded, or indentured labor, involuntary prison labor or human trafficking. Employees have the right to enter into employment voluntarily and freely. Employees have the right to freely terminate employment at any time without the threat of penalty, by means of reasonable notice.

— Non Violence, No Discrimination and Fair Treatment

Business Partners shall provide a workplace free from discrimination and harassment. They shall not subject workers to inhumane treatment such as sexual harassment or corporal punishment. They shall ensure equal opportunity and treatment of all employees in recruitment, employment, development, and career advancement, providing equal opportunities based on fair, transparent and objective criteria.

— Wages, Benefits and Work Hours

Business Partners shall pay workers according to applicable wage laws, including minimum wage, overtime hours and mandated benefits. Business Partners shall clearly and promptly communicate on the basis on which workers are paid. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned.

— Freedom of Expression and Association

Business Partners shall respect the right for employees to communicate, raise concerns about working conditions, and to establish and join trade union of their own choice, in compliance with applicable laws and regulations freely and voluntarily.

— Privacy and Data Protection

Business Partners shall respect individuals in a manner consistent with the rights to privacy and data protection. They shall take reasonable precautions to protect personal information against loss, theft, misuse, unauthorized access, disclosure, alteration, or destruction.



HEALTH AND SAFETY

Business Partners shall provide a safe and healthy working environment for their employees and the public. They shall comply with applicable workplace safety laws, regulations, policies, and “Environment, Health and Safety” (EHS) standards, specifically the following aspects:

— Workers Health and Safety

Business Partners shall protect workers from over exposure to chemicals, biological and physical hazards, and physically demanding tasks in the workplace and in any company-provided living quarters. Business Partners shall have programs in place to prevent or mitigate catastrophic incidents associated with operations and processes. Programs shall be commensurate with the facility risks. Business Partners shall ensure access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

— Hazard Information and Training

Business Partners shall make available safety information relating to hazardous materials in the workplace, including pharmaceutical compounds and pharmaceutical intermediate materials, to educate, train and protect workers and others from hazards.

— Emergency and Preparedness

Business Partners shall identify and assess emergency situations in the workplace and any company-provided living quarters and minimize their impact through prevention and by implementing emergency plans and response procedures.



ENVIRONMENT

Business Partners shall operate in an environmentally responsible and efficient manner into all aspects of their business. They shall have appropriate management systems in place to effectively manage environmental risks.

— Compliance with Laws and Regulations

Business Partners shall comply with all applicable environmental regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained, and operational and reporting requirements followed.

— Natural Resources Conservations

Business Partners shall conserve natural resources and engage in activities aimed at reducing water usage, energy consumption and greenhouse gas emissions. Business Partners shall have systems in place to quantify the amount of water used, energy consumed, and greenhouse gases emitted by their operations.

— Waste Management

Business Partners shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges. Any waste, wastewater, or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment.

— Spills and Release

Business Partners shall have systems in place to prevent and mitigate accidental spills and releases into the environment.



ETHICS AND BUSINESS INTEGRITY

Business Partners shall comply with all applicable laws and regulations into all aspects of their activities from research, through supply chain and manufacturing, to access to the patients. They shall interact transparently and in accordance with applicable legislations with healthcare professionals and organizations, patients and patients' organizations, policy makers and payers. They shall conduct their business in an ethical manner, act with integrity and maintain processes and procedures to prevent, detect and fight non-ethical practices. Management systems should be in place to fight fraud, corruption, tax evasion and money laundering.

— Product Safety and Quality

Business Partners involved in the supply, manufacturing, packaging, testing, storage and distribution of materials/products on behalf of Ipsen will ensure compliance with applicable Quality Regulations, Good Manufacturing Practices (GMPs) and Good Laboratory Practices (GLPs) for the markets in which the products are registered and distributed. Documentation or data relevant to activities performed, must be original, accurate, legible, controlled, retrievable, and safe from intentional or unintentional manipulation or loss. Business Partners will comply with all record retention requirements set by local regulators, as well as those specified in any Quality Agreement with Ipsen.

— Clinical Trials

Business Partners involved in clinical trials on behalf of Ipsen shall ensure compliance with all applicable regulatory requirements in the countries where clinical trials are conducted and where Ipsen's products are marketed, registered, and distributed. Partners must respect and adhere to relevant guidance on Good Clinical Practices (GCPs) issued by national and local regulatory authorities. Business Partners managing the clinical trials shall provide full visibility to Ipsen of any subcontracted clinical trial activities.

— Animal Welfare

Animals shall be treated respectfully, with pain and stress minimized. Animal testing should be performed after consideration to replace animals, reduce the number of animals used or refine procedures to minimize distress. Alternatives should be used whenever scientifically valid and acceptable to regulators.

— Responsible Product Promotion

All marketing and promotional materials and activities shall conform to high ethical, medical, and scientific standards, and comply with all applicable laws and regulations. When engaged with healthcare professionals, patients or animal healthcare professionals, all Business Partners should adhere to relevant industry standards of conduct that apply, such as the European Federation of Pharmaceutical Industries & Associations (EFPIA), the International Federation of Pharmaceutical Manufacturers & Associations (IFPMA) and the Pharmaceutical Research and Manufacturers of America (PhRMA).

— Interaction with Government Officials

Any relationship between Business Partners and public officials is in strict compliance with the rules and regulations to which they are subject. Any benefit conveyed to a public official shall be fully transparent, properly documented, and accounted for.

ETHICS AND BUSINESS INTEGRITY

— Confidential Information and Intellectual Property Protection

Business Partners shall safeguard and make proper use of Ipsen's intellectual property and confidential information, including any personal information collected, stored, or processed for or from Ipsen, and act to prevent its loss, misuse, theft, improper access, disclosure or alteration. They shall obtain Ipsen approval before communicating or disclosing externally any information related to Ipsen.

— Insider Trading

Business Partners shall not use or share non-public information about Ipsen. Buying or selling securities of the company while being aware of such non-public information is considered as "insider trading" and therefore illegal. Non-public information may include clinical trials data, corporate strategies, mergers and acquisitions, strategic contracts, court cases or changes in Ipsen top management.

— Conflict of Interest

Business Partners shall avoid situations that present or may create the appearance of a conflict between their interests and those of Ipsen. They shall avoid interactions with any Ipsen employee that might conflict, or appear to conflict, with that employee acting in the best interests of Ipsen. Business Partners shall declare any conflict of interest that may affect the performance of tasks or provision of services entrusted to them by Ipsen.

— Gifts and Entertainment

Business Partners employees are not allowed to accept and provide any gifts, invitations to a meal or social, cultural, sporting or hospitality event that may compromise their independence or judgment regarding a third party or that otherwise may be considered as, or reasonably appear to be, inappropriate.

— Fair Competition

Business Partners shall conduct their business consistent with fair and vigorous competition and in compliance with applicable antitrust laws. Business Partners shall employ fair business practices including accurate and truthful advertising.

— Compliance with Trade Controls Regulations

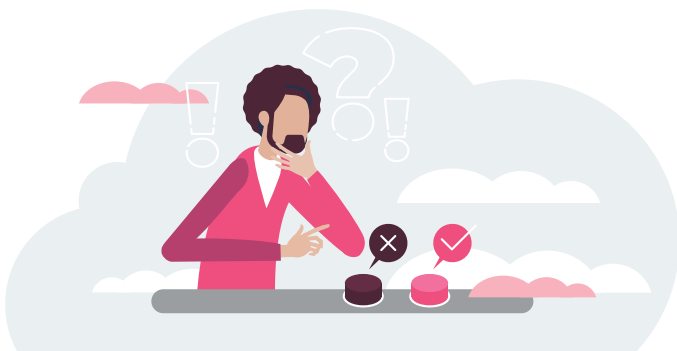
Business Partners must comply with all applicable import and export controls, sanctions, and other trade compliance laws of applicable country(ies) where transaction(s) occur.

— Fight Against Corruption

Business Partner shall not accept, offer or give, directly or indirectly through third parties, anything of value to any person or organization, whether public officials or not, to obtain or retain any undue advantage. Business Partners shall comply with all applicable international and national laws, regulations and codes that prohibit any form of corruption. This commitment must be extended to the third parties to whom they may subcontract all or part of their tasks or services for Ipsen.

— Information Disclosure

Business Partners must accurately record and disclose information regarding their business activities, financial situation and performance in accordance with applicable laws and regulations. Business Partners must keep financial books and records in accordance with applicable legal, regulatory and fiscal requirements and follow accepted accounting practices.



REPORTING CONCERNS

Business Partners who believe that an Ipsen employee, or anyone acting on behalf of Ipsen, has engaged in illegal or otherwise improper conduct, should report the matter promptly to Ipsen.

Any individual or organization, who knows or suspects that an Ipsen Business Partner, or anyone acting on their behalf, has engaged in activities that violate Ipsen's Business Partner Code of Conduct, should speak up at Ipsen.Ethics.Hotline@ipсен.com to report the concern to Ipsen through the email address.

The information submitted through the email address will only be received by the specific individuals in the Ipsen Business Ethics Department entrusted with the management of alerts.

