

CODE OF ETHICS



sanofi pasteur MSD
v a c c i n e s f o r l i f e

CODE OF ETHICS

TABLE OF CONTENTS

Message from the President	5
General provisions.....	6
Rules specific to pharmaceutical industry.....	7
Respect for free competition	8
Relations with suppliers and services providers.....	9
Avoidance of conflicts of interest.....	10
Transparency in accounting and internal audits.....	11
Relations with employees / health and safety.....	12
Fighting corruption and bribery	13
Protection of confidential information / Prevention of insider trading.....	14
Protection of personal data.....	15
Involvement in political activities.....	16

MESSAGE FROM THE PRESIDENT

Dear Colleagues,

Vaccines are one of the most fascinating, powerful and effective means to help protect individual and public health. And vaccines are our passion. Our teams have unmatched vaccine expertise and we are the only company in Europe dedicated exclusively to vaccines.

Sanofi Pasteur MSD contributes to improving the health of millions of Europeans every year with the widest vaccine portfolio for all age groups – children, adolescents, adults and the elderly.

At Sanofi Pasteur MSD, we want that people live and stay healthier longer, feel better and achieve more thanks to vaccines. It is our mission to provide efficacious, safe and cost-effective vaccines, to support and promote vaccination development throughout Europe with equal access to vaccines, and to generate wealth through justified efforts in preserving life and health.

We can successfully achieve this mission only if we inspire trust and confidence on the part of the medical community, patients, government officials, regulators, journalists, investors and other stakeholders. Even more, we need to inspire trust and confidence among ourselves. To do so, we commit to the highest standards of integrity and ethics. This Code of Ethics formalizes our commitment and defines how to apply it in practice.

We shall all act in full compliance with this Code of Ethics, with the procedures adopted to implement this Code, with applicable laws and regulations, and with rules of business conduct issued by relevant professional associations. I rely on each of you to comply with our Code of Ethics, to get involved and to promote these principles that will help us ensure sustainable success of Sanofi Pasteur MSD, well into the future.

You may well be required to make choices where the requirements of this Code of Ethics and the perceived needs of Sanofi Pasteur MSD have to be reconciled. Do not make decisions alone, and do not sacrifice our principles. Contact your managers and/or your Compliance Officer to discuss any issues that arise and, when in doubt, make compliance with the Code of Ethics your first priority.

Sincerely yours,

Jean-Paul KRESS, PRESIDENT

GENERAL PROVISIONS

Scope

This Code of Ethics sets out the minimum standards which SPMSD considers must apply to SPMSD legal entities as a whole.

All legal entities that are part of the SPMSD group are required to comply with this Code of Ethics and, subject to local laws and regulations, must adopt policies and procedures that are consistent with, and as comprehensive as, this Code of Ethics.

Compliance with this Code of Ethics is not, however, an excuse for violating other relevant international and local laws and related internal policies and procedures. The strictest applicable rules must be applied, whether they are those noted in this Code of Ethics or those imposed by international and local laws and regulations.

Employees' adherence to SPMSD's Code of Ethics

Compliance with this Code of Ethics protects not only SPMSD, but each one of us. It helps ensure our collective and individual success. We must strive to make it a key part of our daily work.

Everyone at SPMSD has as his/her responsibility maintaining his/her own behaviour in line with the standards set forth in this Code of Ethics. Employees should also bear in mind that there are specific laws and internal policies and procedures that address in greater details the topics discussed here. Employees are required to familiarize themselves with the applicable laws and internal policies and procedures governing their areas of responsibility and to follow them. Any ambiguities should be clarified with the appropriate SPMSD resource person listed below.

As a consequence, each employee has a duty to prevent breaches by reporting any questionable situation to his/her manager, or his/her Compliance Officer and SPMSD's specific departments such as the Human Resources, Finance, Regulatory or Legal departments. Each problem must be considered and resolved.

Employees shall act in good faith and with no malicious intent. They will not be disciplined or discriminated against provided that they act accordingly, even if the facts reported prove to be inaccurate or no further action is taken.

Resources

If any situation is unclear or if you have any questions related to this Code of Ethics, please get in touch with one of the following contacts:

Manager – You should begin by consulting the person who

best understands your area of responsibility – your manager unless the problem involves your manager. In this case you will speak with one of the other resources below.

Compliance Officer – For any questions concerning this Code of Ethics or Compliance, you should contact your Compliance Officer or your Compliance Committee.

Human Resources – For issues arising with your managers, you should contact your site Human Resources representative.

Legal Department – The Legal Department can provide guidance with questions concerning laws and acceptable business practices.

Finance Department – For questions concerning financial issues, you may contact the [Controller] assigned to your business unit.

Regulatory and Scientific Affairs - For questions relating to pharmaceutical activities, you may contact your site Regulatory and Scientific Affairs representative.

Distribution of this Code of Ethics

Each employee shall be provided with an electronic copy of this Code of Ethics, and must acknowledge its receipt.

External partners/collaborators of SPMSD must be informed of the content of this Code of Ethics and of SPMSD's requirement that their behaviour complies with the principles contained herein. In this regard, you will be responsible for informing your non-employee contacts of the existence of this Code of Ethics and for verifying the inclusion in agreements of provisions relating to SPMSD's ethical standards.

Consequences of Violations of this Code of Ethics

Compliance with the requirements of this Code of Ethics is an essential part of the contractual obligations of all SPMSD employees.

Violations by employees of the requirements of this Code of Ethics will be subject to all appropriate sanctions, based on applicable provisions of law and individual and collective labour agreements.

RULES SPECIFIC TO PHARMACEUTICAL INDUSTRY

Complete transparency, integrity and ethical conduct in the SPMSD's relations with patients, members of the health professions and public authorities is a constant commitment of SPMSD and its employees and partners.

SPMSD believes in competing on the merits of its products and services and wishes to avoid even the appearance of improper conduct with the medical and scientific community.

SPMSD's purpose in participating at conferences, conventions and scientific meetings or in educational programs is to improve patient care and to share medical and scientific information. Such participation must be related to the role that SPMSD plays in research, development and scientific information.

GUIDING PRINCIPLES

- All Information furnished to SPMSD's customers about its products and services, including availability and delivery, must be objective, accurate, supported by relevant scientific evidence, and presented honestly, fairly and by proper means.
- SPMSD does not communicate publicly about a product with the intent of promoting it for use before it is approved for such use.
- Only designated employees are authorised to speak on behalf of SPMSD or about its products or services. This rule applies for any kind of public communication and by any means including the internet and social media.
- Biomedical researches (clinical trials and epidemiological studies) are developed to further science. In all company sponsored research endeavours, SPMSD refrains from any attempt to influence the results and conclusions of that research. Clinical development research at SPMSD is conducted under the direction of qualified medical and scientific personnel and according to the highest standards of medical and clinical ethics.
- All interactions with healthcare professionals are to be conducted in a highly professional and ethical manner. No monetary or other benefit is to be given directly or indirectly to healthcare professionals for the purpose of gaining influence or to promoting

- SPMSD's products or services.
- When participating at conferences, conventions and scientific meetings or in educational programs, the agenda of the program must be appropriate for participants and support the program's or meeting's purpose.
- All payments or aids either monetary or in kind to healthcare professionals; members of healthcare professional groups and patients' organisations, must be properly documented, open to review and justified with a legitimate purpose, in writing. The same rule applies to donations to associations.

Pharmaceutical regulations and standards

SPMSD abides by the international, European and national laws, regulations and standards applicable to its activities.

Particular attention must be paid to **European pharmaceutical industry standards formalised by EFPIA codes and any local enacting codes.**

SPMSD believes that adherence to these regulations and standards is essential. They should be respected at all times. Violations of these standards may harm SPMSD group, its relationships with patients and the medical and scientific community, may damage its reputation and image and may make SPMSD and any individuals involved susceptible to liability under civil, administrative and criminal law.

RESPECT FOR FREE COMPETITION

Free competition was from the beginning of the European Union (Treaty of Rome – 1957) and remains today a central tool for structuring the European economic and political model. We must ensure that we comply fully with EU competition law and equivalent provisions of national competition laws.

The proper functioning of the economy is based on fair and loyal exchange within the framework of open competition. Competition issues may notably arise from:

- › collusion among competitors and anti-competitive agreements/arrangements a company has with one or more undertakings including suppliers, customers or distributors, and
- › abuses of a dominant market position.

Anti-competitive practices are not compatible with laws and SPMSD's values and the reputation we seek to maintain. Anti-com-

petitive practices may lead to **finances, civil liability for damages, exclusion from public contracts or criminal liability**. These sanctions may damage the whole SPMSD group.

You¹ should contact your Legal Department before initiating projects or contacts that may hinder free competition with our competitors.

Information of any nature concerning pricing, customers, suppliers, distributors or potential competitors may only be obtained by lawful means. Third-party intellectual property rights (patents, know-how, trademarks, etc.) must always be respected.

All acts designed to defame a competitor, discredit its products, or harm its reputation are strictly forbidden.

Loyalty and honesty must drive SPMSD's actions in its dealings with its customers, suppliers, distributors or potential competitors.

GUIDING PRINCIPLES

The following subjects, among others, may never be addressed when speaking with competitors, except if the information is in the public domain:

- › **Price or means of fixing prices**, including reductions, modalities of determining prices and invoicing conditions.
- › **Production**, including capacity, and increase in capacity.
- › **Allocation of markets** between competitors by geographical region, customer or type of application.
- › **Financial information**, including costs of goods and services purchased or products, profits or profit margins.
- › **Marketing and product information**, including terms and conditions of guarantees, marketing and distribution projects and strategies/marketing.
- › Intention of entering into competi-

tion or not in an invitation **to tender and its contents**.

- › **Suppliers and services providers**, including existing agreements with a supplier, a group of suppliers or a services provider and specific conditions of such agreements.
- › **Customers**, including existing agreements with a particular customer or group of customers and specific conditions of such agreements.

If a competitor volunteers such information, whether in a trade association meeting, in a conference, or elsewhere, you must terminate the conversation immediately, show your disapproval and bring the situation to the attention of your managers and your Legal Department.

Any discussions, whether in a formal or informal context including information exchanges, can constitute an anti-competitive agreement or practice. While the exchange may be intended to be innocent, it could create the appearance of price-fixing or bid-rigging.

Trade association meetings provide an

opportunity to get together with competitors and discuss matters of mutual interest. This is quite legitimate, provided, however, that the limits imposed by antitrust law are respected.

Contacts/discussions with actual or potential competitors must be scheduled, have a written agenda and clear indication of the purpose and be evaluated on a case-by-case basis with the prior assistance of your Legal Department.

1. In this document, the word "You / you", refers to SPMSD's employees.

RELATIONS WITH SUPPLIERS AND SERVICES PROVIDERS

SPMSD selects goods and services that best contribute to the long-term of the company.

To ensure that all suppliers are given an opportunity to compete for our business, SPMSD obtains competitive bids where appropriate.

SPMSD chooses its suppliers based on price, quality, delivery, service, diversity and reputation. Other factors, including environmental and business practices, may also be taken into consideration. SPMSD condemns the use of forced labour and exploitative child labour and expects its suppliers and services providers to respect this principle as well.

Suppliers and services providers must be selected with

complete impartiality. Selection cannot be influenced by criteria having no relation to the supply of the products or services concerned.

In all events, the compensation to be paid under an agreement must be exclusively commensurate with the services indicated in the agreement, and with the professional abilities and the actual services performed.

SPMSD treats its suppliers and services providers with fairness and integrity. SPMSD respects the terms and conditions of agreements and honours its commitments. SPMSD strives to pay on time and is careful to protect the confidential and proprietary information of its suppliers and services providers.

GUIDING PRINCIPLES

In relationships with suppliers of goods and services, you are required to:

- › **respect internal procedures** for the selection and management of relationships with suppliers and services providers, without precluding any company that possesses the necessary requirements from the opportunity to participate in SPMSD's bids.
- › adopt **objective assessment criteria** for the selection of suppliers and services providers, according to previously declared and transparent methods.
- › aspire to the principles of **honesty and good faith in correspondence and dialogue** with suppliers and services providers.

Any contractual relationship must be formalised by a written agreement before the activity begins and contractors and subcontractors are expected to respect the principles of this Code of Ethics.

Payments may never be made in cash, nor to an individual other than the contractual counter-party's authorised representative, nor may payments be made in a country other than the one where the parties are located or where the agreement has been fulfilled.

Contracts with suppliers and services providers must:

- › include **specific provisions** on ethical business practices, confidentiality, data protection, the fight against corruption and bribery, conflicts of interest and rights of audit;
- › provide for confirmation that the suppliers / services providers comply with applicable employment laws in the places where they are providing services;
- › provide for **adequate sanctions** in the case of violations, such as, for example, termination of the contract;
- › be signed only after **pre-contractual due diligence process** has been fulfilled as requested under the anti-corruption and anti-bribery rules.

AVOIDANCE OF CONFLICTS OF INTEREST

Within the course of employment you have an obligation to make decisions strictly on the basis of SPMSD's best interests, without regard to personal interests.

Any situations that could be construed as a Conflict of Interest must be carefully avoided. When conducting your professional activities, you must act in the sole interest of SPMSD. You must refrain from taking advantage of any benefit or personal interest, either directly or indirectly, for your own account or for others such as friends or family. Should a Conflict of Interest arise, you must bear in mind your duty of loyalty toward SPMSD. In case of doubt, consult your manager, your Human Resources Department, or your Legal Department, as the case may be.

The name or image of SPMSD may never be used or committed for personal interests.

You may not accept any payment of money or an advantage of any kind from a third party that has business relations with SPMSD or seeks to establish such relations, and you may not seek to draw profit for yourself (or others) from confidential information or business opportunities of which you gain know-

ledge as an SPMSD's employee.

Examples of actual or potential Conflicts of Interest include the following:

A potential **"Conflict of Interest"** arises when you become involved, directly or indirectly, in outside activities that could impair, or be perceived to impair, your business judgment.

- › Having a personal financial interest in a supplier, services provider, customer, competitor or distributor.
- › Receiving any form of gift or compensation of any kind from an actual or potential supplier, services provider, customer, competitor or distributor.
- › Having a personal interest or potential for gain in any SPMSD-related transactions.
- › Serving on an advisory board, board of directors or similar management body of an association, foundation or company which is in a similar market/industry as SPMSD.
- › Having a close relative who works at a public administration that approves SPMSD's products.
- › Hiring an employee and/or a consultant due to their family relationship with decision-makers in a public administration.

GUIDING PRINCIPLES

The key to addressing Conflicts of Interest is full disclosure. Sometimes, just disclosing the potential Conflict of Interest to your manager and your Human Resources Department is the only action required in order to permit the company to adapt the decision-making process.

If you believe you may have a potential Conflict of Interest, you must discuss the situation with your manager or supervisor and your Human Resources Department, prior to taking any decision.

TRANSPARENCY IN ACCOUNTING AND INTERNAL AUDITS

Accuracy of Books/Records

SPMSD must record all information honestly and accurately. This includes, but is not limited to, expenses, revenues, research test results, production and quality data and any other corporate information. SPMSD must ensure that it fully complies with all applicable statutory obligations with respect to, notably, reporting and audit, record and document retention and public disclosure.

Accounting transparency requires accurate and complete information for all accounting records. Files must be complete, orderly and readily understandable.

All financial transactions and payments must be authorised and recorded. Strict compliance with corporate accounting methods is required.

Each transaction must be reported and accompanied by suitable documentation or evidence of the activity performed, in order to allow for:

- › simplified reporting in the accounting records;
- › the identification of varying levels of responsibility; and
- › the accurate reconstruction of the transaction, thereby reducing the probability of errors of interpretation.

If you notice omissions or errors in accounting records or the documents that serve as the basis for accounting records, you must report them to your Finance Department and to your manager.

Internal Audits

Internal audits are intended to review and verify SPMSD's activities with the objectives of ensuring:

- › cost control, including efficacy and efficiency of corporate operations in compliance with SPMSD's strategies, objectives, policies and procedures, and for the purpose of safeguarding SPMSD's assets; and
- › the reliability of SPMSD's information systems for financial management and compliance reporting purposes.

Full cooperation with auditors is required.

RELATIONS WITH EMPLOYEES / HEALTH AND SAFETY

Non Discrimination/Equal Opportunity

SPMSD avoids any and all discrimination based on age, gender, sexual preference, disability, health, race, nationality, political or religious beliefs or any other criteria that could interfere with an individual's fundamental rights and freedoms.

SPMSD offers all of its employees equal employment opportunities in selection and advancement, ensuring that everyone enjoys equal treatment based on skills and abilities, without any type of discrimination.

Harassment

SPMSD is committed to safeguarding the moral integrity of its employees and guarantees the right to respectful working conditions and personal dignity.

SPMSD aims to protect its employees from acts of psychological pressure or violence and challenges any attitudes or behaviours that are discriminatory or injurious to an individual and his or her beliefs and customs.

SPMSD condemns harassment in work relationships. SPMSD strives to maintain an environment free of harassment, where all employees are respected.

The term «harassment» includes, but is not limited to the following examples:

- › the creation of an intimidating, hostile or isolated work environment with regard to individual employees or groups of employees;

- › hindering work prospects for others, other than on the basis of performance; and
- › sexual harassment and disturbing or inappropriate behaviours or communications.

Protection of Employee Privacy

SPMSD respects the privacy and dignity of its employees and safeguards the confidentiality of employee records. SPMSD collects and retains personal information needed to support functions such as benefits, compensation and payroll, as well as for other purposes as required by law. SPMSD is committed to protecting personal data concerning its employees and preventing the improper divulgation of personal data and their inappropriate use.

The privacy of employee communications, including e-mail and Intranet/Internet usage, is subject to SPMSD's business needs, within the limits set by SPMSD's procedures and applicable laws.

Health and Safety

SPMSD is committed to risk prevention for humans and the environment in compliance with applicable regulations.

In relation to its activities, SPMSD is also committed to disseminating and consolidating a culture of workplace safety, by developing the awareness of risks and using all of the necessary resources to guarantee the safety and health of its employees.

GUIDING PRINCIPLES

If you feel that you have been the subject of discrimination or harassment, feel free to tell the person involved. If you are not comfortable with a direct approach or if it fails to correct the problem, or if you have concerns about health, safety or environmental issues contact your manager or your N+2 and/or your Human Resources Department who will be in charge of resolving that issue. You may be accompanied in this approach/process by any person entitled by the local applicable procedures.

FIGHTING CORRUPTION AND BRIBERY

SPMSD requires strict compliance with all legal requirements banning corruption and illicit payments of any kind.

SPMSD is subject to the anti-bribery and anti-corruption provisions of numerous legal provisions, such as, the **French Criminal Code**, the **UK Bribery Act**, the **UN Convention Against Corruption**, the **1997 OECD Anti-Bribery Convention**, the **U.S. Foreign Corrupt Practices Act** («FCPA») and other national implementing laws and regulations.

These provisions are designed principally to prevent and punish all acts of corruption **of domestic or foreign public officials** and target:

- › **active corruption**, where an undue benefit (money, gifts, services, etc) is offered or promised with a view to inducing a public official or any other person to do or not do something within the scope of, or facilitated by, their job or position
- › **passive corruption**, where a public official or any other person solicits or obtains offers or promises of money, gifts, services or benefits to do or not do something within the scope of, or facilitated by, their job or position.

The regulations apply not only to **direct corruption**, but also to **indirect corruption** (carried out by third parties in the name of or on behalf of a company or an individual such as SPMSD services providers or suppliers).

“Public Official” is understood as any individual employed by or who acts on behalf of, or who has a role or responsibility executing a public service for, a government, entity, administration or public authority, as well as any independent public body, political party, agency or administrative authority and its associated offices. **Public Officials include health professionals working for public entities or serving as advisers or consultants to public entities whether paid or not.**

To satisfy these principles **transparent and ethical conduct** must be demonstrated in SPMSD's relationships with public officials. Any behaviour that could be interpreted as corruption, such as bribes, fraud, overpayments, or misuse of financing or other payments by public administrations must be avoided.

The fight against corruption and bribery goes beyond relations with public officials. **Commercial bribery** is also subject to numerous laws, and will not be tolerated. The same general principles that apply to relations with public officials are equally applicable to other parties with which we interact.

You and SPMSD group may be subject to civil, administrative or criminal sanctions in the event of violation of the laws on bribery and corruption of public officials and business partners.

GUIDING PRINCIPLES

You should always follow the following guidelines:

- › Before entering into any relationship with a supplier or a services provider, an expert, a consultant or any other potential partner, you must ensure that you know with whom you do business, why, and when and to whom you are providing funds or other benefits. SPMSD must be in a position to be confident that business relationships are transparent and ethical. To this end, under certain

circumstances a **pre-contract due diligence process** must be followed and a **specific form** must be completed and signed.

- › **Special approval is required** prior to providing contributions / financing / gifts / invitations / hospitality / or other benefits to public officials (or their families), either directly or through intermediaries. In such cases you must consult your manager and your Compliance Officer. Please be aware that in many cases the offer or promise of presents, gifts or benefits to public officials (or to their families) or to other parties with which we interact is strictly prohibited.

- › In any case, you must identify SPMSD individuals with decision-making power over the spending process. You must be sure that you follow strictly SPMSD internal procedures for expense approvals.

In the event of any doubt about whether a gift or payment is legal or not, you must inform and consult your manager and your Legal Department.

If you suspect any instances of bribery or corruption of a public official, one of our commercial partners or an SPMSD representative, report them to your manager and or to your Compliance Officer.

PROTECTION OF CONFIDENTIAL INFORMATION / PREVENTION OF INSIDER TRADING

Confidential information is an important SPMSD's asset that must be protected.

SPMSD's competitive advantage is primarily based on sensitive information of a scientific, technical, or commercial nature. SPMSD is exposed to the risks of piracy of computer files, infection with viruses, or similar incidents.

The loss or disclosure of confidential information can be extremely damaging to SPMSD's competitive position and intellectual property rights.

Insider trading laws prohibit trading of listed securities on the basis of non-public / unpublished information, or the sharing of such information with third parties. In other words, every SPMSD employee may not buy or sell the

shares of SPMSD's shareholders when in possession of non-public information that could influence the price of such shares («inside information»). The same restrictions apply to non-public information about other companies that you learn when acting for SPMSD.

Confidential information are non-public information that include but are not limited to information regarding pricing, formulations, content of agreements, research results, manufacturing methods, financial data and marketing and sales strategies and plans.

Common examples of inside information include financial results, knowledge about acquisitions or divestitures, important clinical results, and material information about new products that has not yet been made public.

It is therefore essential to ensure that confidential information is protected and to examine carefully any situation in

which information is transmitted outside of SPMSD, even to third parties with which SPMSD has long-established business relationships.

GUIDING PRINCIPLES

You are responsible for protecting the confidentiality of SPMSD's information, and you should follow the following guidelines:

- › Disclose confidential information strictly on need-to-know basis;
- › Do not discuss sensitive business in public;
- › Use password protection on computer files according to SPMSD procedures;
- › Secure sensitive information in locked files and cabinets;
- › Secure sensitive information on laptop computers while travelling; and
- › Exercise caution when using speaker-phones and cellular phones.

Before passing on any sensitive information to a third party, your manager or your Legal Department must be consulted in order to determine whether it is necessary to execute a confidentiality agreement or to take any other specific protective measures. Remember however that once information is improperly used or disclosed, it is very difficult to obtain an effective

remedy, even if a confidentiality agreement has been signed. SPMSD's best protection is to limit disclosure and to continuously assess the reliability of third parties.

If you face a situation that may suggest that the protection or confidentiality of sensitive information may have been compromised (including the disappearance of documents, unusual request for information, indications that information systems have been manipulated, etc), contact your manager or your Legal Department.

If you are in doubt as to whether the purchase or sale of securities would violate insider trading laws, please consult your Legal Department.

Confidential information cannot be used, communicated or disseminated except for its intended purposes. Even after ceasing their relationships with SPMSD, employees and other representatives must maintain the confidentiality of SPMSD's information and return all SPMSD documents and files (including electronically-stored information).

PROTECTION OF PERSONAL DATA

The processing of personal data may constitute or be considered as a violation of privacy and individual liberties.

You and SPMSD share an obligation to protect personal data.

In Europe, the processing of personal data is governed by the **EU Directive 95/46/EC** on «the protection of individuals with regard to the processing of personal data and on the free movement of such data» and local implementing laws and regulations.

Personal data protection gives individuals whose personal data is held by SPMSD the right to **control the collection, processing, use, disclosure and storage of data** relating to them.

Personal data means any information relating to a natural person who is or can be identified, directly or indirectly, by reference to an identification number or to one or more factors specific to him/her such as name, date of birth, social security number, photograph, personal address, professional activities or address, telephone number, e-mail address, computer ID, sex, religion, political preferences, social activities, economic habits and so on.

Processing of personal data means any operation in relation to such data, whatever the mechanism used especially the obtaining, collection, recording, storage, use, disclosure, dissemination or otherwise making available, use, deletion or destruction.

GUIDING PRINCIPLES

If you need to process personal data, you must follow the following guidelines:

- › Ensure that you retain personal data in compliance with applicable legislation (European and local).
- › Ensure that you or SPMSD have completed all required formalities and notifications prior to commencing data processing (generally, this includes declarations or requests for authorisation to be addressed to your local authorities/data agencies).
- › Ensure that people whose personal data are collected are informed of the fact and of their right to access and rectify their personal data.
- › Ensure that personal data is used fairly and for specific, clear and legitimate purposes.
- › Ensure that personal data is only retained for as long as it is necessary for the purpose for which it is processed.

As all countries outside the European Union do not provide personal data protection equivalent to the European Union standards, you must keep in mind that transfers of personal data from a European Union country to a third country are strictly regulated. You should consult the Legal Department before any transfer.

Each SPMSD employee is responsible for the personal data processed by himself/herself and the completion of the corresponding formalities. If you have any doubt on how to proceed, you must consult the Legal Department.

INVOLVEMENT IN POLITICAL ACTIVITIES

SPMSD respects the individual engagement of its employees in political activities, including participation in the political process, contributions to candidates or parties.

Good corporate citizenship requires that we do not unfairly or illegally influence the political process in the communities in which SPMSD operates.

However, you are not authorised to commit SPMSD, directly or indirectly, to participate in the political process, to support a political party in any manner, or to use your affiliation with SPMSD in political activities.

GUIDING PRINCIPLES

All involvement by SPMSD or one of its subsidiaries in political activities is subject to prior approval by SPMSD's legal representative.

None of the premises, equipment, or any other assets of SPMSD may be used to conduct political activities.





