

*Danone's
Compliance Policies*

**HEALTHCARE
SYSTEMS
COMPLIANCE
POLICY**

2022 EDITION



DANONE
ONE PLANET. ONE HEALTH

COMPLIANCE

EVERY DAY WE GO FURTHER WITH YOU

DANONE'S COMPLIANCE AMBITION

We all contribute to One Planet . One Health vision
by operating in an ethical way for the benefit of Danone, our people and society

PURPOSE

Drive cultural change to reinforce ethics in everyday life @Danone

CODE OF CONDUCT

1

Integrity
Policy

2

Competition
(Antitrust) Policy

3

Personal Data
Privacy Policy

4

International Trade
Sanctions Policy

SECONDARY POLICIES

HCS
Compliance
Policy

BMS
Marketing
Policy

M&A
Compliance
Policy

Public Tender
Policy

Investigations
Policy

Third Party
Vetting Policy

Disciplinary
Code for
Business
Conduct
Breach

FRAMEWORK POLICY

DANGO AUDIT CONTROLS



TABLE OF CONTENTS

PART. 1

FOREWORD	4
COMPLIANCE AT DANONE	5
WHO DOES THIS POLICY APPLY TO?	6
HOW TO USE THIS POLICY	6
RAISING A CONCERN	7
DATA PRIVACY	7
NON COMPLIANCE WITH THIS POLICY	7

PART. 2

INTERACTIONS WITHIN THE HEALTHCARE ECOSYSTEM	8
DEFINITIONS	10
GENERAL PRINCIPLES	11
DOCUMENTATION, BOOKS AND RECORDS	11
EVENTS	12
CONTRACTING WITH HCPS/KOLS AND GOS	14
HCS DONATIONS AND GRANTS	16
SPONSORSHIP	18
GIFTS AND HOSPITALITY	19
PRODUCT SAMPLES	20
PROVIDING INFORMATION TO HCPS	22



FOREWORD

At Danone, our mission is to bring health through food to as many people as possible, it is at the heart of everything we do every day.

As we continue to learn and discover more about the critical role of nutrition in health, disease and recovery, our interactions with the healthcare community are essential to ensure that the products and services we develop are based on medical needs anchored in the latest scientific research. This for example, is how we can develop nutritional solutions with healthcare professionals and patients that are centered around the needs of cancer patients.

When engaging with healthcare professionals and healthcare institutions, we do so in line with our Danone values of being a socially responsible business, guided by the highest ethical standards. We believe by doing so we will continue to earn and strengthen the trust of our external stakeholders and employees whilst protecting our long-term business performance.

I believe engaging with the healthcare community on factual and scientific grounds in an open and transparent manner is essential to impacting health for the better. As we learn from one another, our collective contribution to health will be greater!

This is why I am proud to share this updated version of the Healthcare System (HCS) Compliance Policy. Since 2017 when we launched our first version of the policy, we have learnt and progressed to simplify and further clarify our policy guidance and standards. Building on Danone's recently revised Code of Business Conduct and Integrity Policy, this new version of the policy is here to guide all of Danone's interactions with healthcare professionals and institutions around the globe in an ethical, transparent and responsible manner.

We expect these standards to be known and applied by all our employees and external partners and used as positive differentiators and accelerators of existing good practices at the fundament of sustainable collaboration with the healthcare community.

We thank all our employees and partners for their commitment to driving ethical business with our healthcare partners and beyond!



Jean Marc Magnaudet
President, Specialized Nutrition Unit

June 2022

A woman with blonde hair, wearing a blue knit sweater and pearl earrings, is smiling and holding up a large teal speech bubble. The speech bubble contains the text 'COMPLIANCE AT DANONE' in white, bold, uppercase letters. The background is a solid light blue color.

**COMPLIANCE
AT DANONE**

WHO DOES THIS POLICY APPLY TO?

This Policy applies to all employees (including temporary workers, interns, corporate officers and COMEX members) and Contracted Partners who interact on behalf of Danone within the Healthcare Eco System, no matter how often the interaction occurs. It applies to all geographies, Danone subsidiaries, controlled Joint Ventures and Contracted Partners.

This policy applies irrespective of whether the Healthcare Professional (HCP) is a public official or works in the private sector or is a Key Opinion Leader (KOL). It also covers interactions with Healthcare Organizations (HCOs) and Patient Organizations (POs) as long the interaction involves HCPs providing advice to, or taking decisions about, Patients.

All employees must ensure they

- Know and understand this HCS Compliance Policy
- Comply with this HCS Compliance Policy
- Operate within Danone's Ethical Standards
- Apply the HCS Compliance Policy in all activities and interactions with the HCS.



For full details of all the Roles and Responsibilities in relation to Compliance at Danone please refer to the **Compliance Framework Policy**.

HOW TO USE THIS POLICY?

This HCS Compliance Policy applies to all our interactions with HCPs, HCOs and POs, such as:

- Discussions of scientific and factual information related to our products or services
- Financial support for educational purposes to attend scientific events, whether organized by Danone or by third parties
- Engaging with HCPs for public speeches, professional advice or to act as principal investigators in clinical studies on Danone's behalf
- Considering requests for HCS Donations, Grants or Sponsorship activities.

This Policy represents company-wide minimum standards that can only be overridden by stricter local laws, regulations, codes or policies, where applicable. This Policy is detailed further regarding operational procedures in the internal Health Care System Compliance Directive.



This Policy is part of a continuous learning process built on 4 years of implementation of our first global HCS Policy.



RAISING A CONCERN

As Danone employees we are all responsible for ensuring that we adhere to the Code of Business Conduct, Integrity Policy and other Compliance Policies, including this HCS Compliance Policy. Any suspicion of misconduct to one of those should trigger a concern.

Raising a concern or “whistle-blowing” is where a Danone employee or an external party informs Danone of suspected wrongdoing. Anyone may raise a



concern using the secured Danone Ethics Line (‘DEL’) www.danoneethicsline.com and benefit from protection of their identity. They may also if they wish, remain anonymous.

The scope of whistleblowing for Danone includes any alleged violations of our Code of Business Conduct, the Integrity Policy, any of our other Compliance Policies, or any non-ethical conduct. It also covers any unlawful behavior, financial malpractice, environmental or human rights violations and any activity which could pose a risk to Danone or anyone working at Danone.

Should any Danone employee have a concern, they should promptly contact their N+1, HR, Finance and/or Local CO or alternatively report on the secured DEL.

Raising a concern in good faith will not expose the person who raised it to any retaliation. Any concern reported in bad faith may however result in disciplinary actions as per the Disciplinary Code for Business Conduct Breach.

All concerns will be impartially and objectively examined. Internal investigations will be conducted as necessary.



For full details of our whistleblowing policy please refer to the **Compliance Framework Policy**



DATA PRIVACY

Danone recognizes the importance of protecting privacy of all individuals.

We are committed to properly collect, use and protect any personal data collected as a result of the interactions with individuals in the HCS, in compliance with all applicable data privacy laws and regulations of the countries in which we operate.

At Danone respecting the personal data of all of those with whom we interact, such as HCPs or Patients, is essential to keep trust.

Therefore, Danone takes measures to act with complete transparency and in compliance with the requirements of the data privacy laws and regulations of the countries in which we operate, and to protect this information according to data protection requirements and our Data Privacy Policy.



NON-COMPLIANCE WITH THIS POLICY

Non-compliance with the HCS Compliance Policy will not be tolerated and may result in disciplinary sanction and / or legal action. The disciplinary action will vary according to the severity of the non-compliance but could include the cancellation of the employee's bonus, postponement of promotion, suspension without pay, termination of employment together with being reported to the authorities.



For full details please refer to our **Disciplinary Code for Business Conduct Breach**.

A man with grey hair, wearing a light purple button-down shirt, is smiling and holding a large teal speech bubble with his right hand. The speech bubble contains the text "INTERACTIONS WITHIN THE HEALTHCARE ECOSYSTEM" in white, bold, uppercase letters. The background is a solid teal color.

INTERACTIONS WITHIN THE HEALTHCARE ECOSYSTEM

TABLE OF CONTENTS

PART. 2

DEFINITIONS	10
GENERAL PRINCIPLES	11
DOCUMENTATION, BOOKS AND RECORDS	11
EVENTS	12
CONTRACTING WITH HCPs/KOLs AND GOS	14
HCS DONATIONS AND GRANTS	16
SPONSORSHIP	18
GIFTS AND HOSPITALITY	19
PRODUCT SAMPLES	20
PROVIDING INFORMATION TO HCPs	22



DEFINITIONS

HEALTHCARE PROFESSIONALS (HCPs)

are individuals who practice a medical, dental, pharmaceutical, midwifery, dietetic, nutritional or nursing profession or any other person who, in the course of their professional activities may prescribe, or purchase, supply, recommend or administer, on behalf of a Patient, a nutritional product, or provide health care services. HCPs can be KOLs and/or GOs.

GOVERNMENT OFFICIALS (GOs)

are defined by the OECD as any person holding a legislative, administrative or judicial office, whether appointed or elected; any person exercising a public function for a country, including for a public agency or public/state-owned enterprise; and any official or agent of a public international organization. Local entities of Danone may adopt a different definition based on local laws, regulations and codes.

KEY OPINION LEADERS (KOLs)

are individuals operating in the medical and scientific areas and recognized for their ability to influence HCPs' medical practice, including but not limited to their knowledge or advising/prescribing behaviors. An HCP can also be a KOL.

HEALTHCARE ORGANIZATION (HCOs)

- That is a healthcare, medical, or scientific association or organization (irrespective of the legal or organizational form) such as hospital, clinic, foundation, university or other teaching institution or learned society (except for Patient Organizations); or
- Through which one or more HCPs provide health care services.

LOCAL COMPLIANCE COMMITTEE (LOCAL CC)

is a local committee consisting of local leadership team members i.e., General Manager, Finance Director, HR Director, Local Compliance Officer, Legal Director and IT Director. They are accountable and responsible for:

- Compliance with this policy within their local geographies including effectiveness of all procedures and approvals processes,
- Ensuring proper review and approval functions laid out under the Healthcare Compliance Directive or any local approval process
- Define an approved benchmark of Fair Market Value (FMV) matrix of HCP/KOL fees based on available external data, broken down by categories of services and/or types of HCP/KOL and reviewed annually
- Setting the right tone at top and act in strict compliance with such tone at all times
- Continual review of effectiveness and compliance with local laws, adaptation from time to time to local risk assessment

LOCAL COMPLIANCE OFFICERS (LOCAL COs)

are members of the General Secretary function in charge of providing all functions in their respective geographies with advice on, and support for, the application of this Policy and the Directive. They are entrusted with the review and approval functions laid out under the HCS Compliance Directive.

PATIENTS

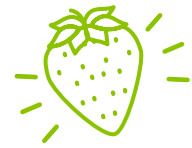
means any person seeking health care services.

PATIENT ORGANIZATION (POs)

means a not-for-profit organization (including the umbrella organizations to which they belong) mainly composed of Patients and/or caregivers (the latter when Patients are unable to represent themselves), that represents and/or supports the needs or interests of Patients and/or caregivers.



GENERAL PRINCIPLES



Any interactions with HCPs, HCOs and POs must be transparent, appropriate and conducted for legitimate purposes.

These interactions must always comply with the Danone Code of Business Conduct, HCS Compliance Policy and all other Danone policies (e.g. Integrity Policy, Danone Policy for the Marketing of Breast Milk Substitutes) as well as any applicable local laws, regulations and codes.

Unethical interactions with HCPs, HCOs and POs, including attempts to improperly induce or reward them or their representatives to promote or recommend products or services to Patients, caregivers or consumers, are **strictly prohibited**.



DOCUMENTATION, BOOKS AND RECORDS

We only enter into transactions within the HCS subject to written contracts that set out in reasonable detail the deliverables we are entitled to or, in case of social contributions, the milestones that allow us to track proper usage of the funds.

For all contracts mentioned in this Policy, we use standard agreements approved by the local legal team and ensure compliance with the local Contract Policy.

The receipt of deliverables that we are entitled to under the contracts needs to be documented in writing, and unless the nature of the contract necessitates advance payment (such as a Sponsorship or Grant agreement), we release payment only upon receipt of documentary proof of return services or goods received.

All transactional documents, including written contracts must reflect the transactions truthfully, completely and accurately.

All documentation (approvals and supporting documentation) must be uploaded into Danone's Integrity approval tool (or equivalent) including post activity documentation which must be kept as per local retention policies.





EVENTS

EVENTS are educational or scientific forums to exchange scientific information related to our product categories with the purpose to advance medical knowledge. They can be organized by Danone or by Third Parties and may happen either in person and/or virtually.

HOSPITALITY are meals, refreshments and or accommodation (offered to HCPs) in the course of normal business relationships, without anything received or expected in return.

OUR POLICY

We may invite HCPs to Events only if the relevant invitations have:

- A clear legitimate purpose.
- A full working agenda of medical, scientific or education content and meet the requirements of all local laws, regulations and codes.

In this context, Hospitality may be provided to HCPs only if it is necessary, moderate (not lavish), reasonable, incidental and secondary to the main purpose of the Event.

Any Hospitality offered to an HCP as part of a visit to Danone's production or research sites must be strictly necessary i.e. an overnight stay required due to the inability to travel in one day and strictly limited to the purpose of the visit.

We may fund HCPs' travel where permitted by applicable local laws and for legitimate professional purposes. In such case, Danone's Local Travel Policy must also be followed.

We do not allow family members, partners or personal relations of HCPs to attend Events.

Events must be approved in accordance with Danone's local compliance procedures.

Invitation to Events are always subject to a written agreement between Danone and the HCP and/or their affiliated HCO detailing the agreed financial support and applicable conditions.

We ensure that the HCP's affiliated HCO is informed about such Event invitation and seek informed approval from the HCP's affiliated HCO when necessary and always as per applicable laws, regulations or codes.



For more details on Hospitality, please see the section on **Gifts and Hospitality**.



IN PRACTICE?

“ You would like to invite an HCP to an Event held in Paris as a reward (holiday) for his support in recommending Danone’s products. ”

➔ We do not conduct, nor invite HCPs to attend Events that in reality are social platforms or otherwise serve mainly for entertainment or recreational purposes. Any invitation must in no way be related to any reward or obligation from the HCO to prescribe, recommend or purchase any of Danone’s products or services. Each invitation must have a clear legitimate purpose and meet the requirements of all local laws and regulations.



IF YOU ARE UNSURE ABOUT A SITUATION, PLEASE CONTACT YOUR LOCAL CO

WE MUST

- ✓ Ensure that the Event or Hospitality meets applicable criteria e.g. extravagant venues are never appropriate
- ✓ Ensure that there is always a written agreement between Danone and the HCP and/or their affiliated HCO about an Event
- ✓ Ensure that local laws permit the Event or Hospitality
- ✓ Consult the Local CO in case of any doubt in relation to an Event or Hospitality

WE MUST NOT

- ✗ Influence or reward an HCP’s decision, advice, professional or business conduct in general, in consideration of an invitation to an Event or by offering any Hospitality
- ✗ Invite HCPs to attend Events that are in reality social platforms or otherwise include for a significant part entertainment or recreational purposes
- ✗ Allow family, partners or other personal relations to accompany HCPs to Events or Hospitality – whether organized by Danone or by a third party





CONTRACTING WITH HCPs, KOLs AND GOs

OUR POLICY

We only contract with HCPs and KOLs (whether GOs or not GOs) for the provision of legitimate and professional services, such as speeches, editorial work, medical research, medical consultancy or input to clinical studies: Every contract must ensure:

- It meets a clear and legitimate business need and only where allowable under local laws and regulations.
- It includes a clear definition of the services to be provided and any remuneration.

When contracting with HCPs/KOLs/GOs, we use selection criteria that we can explain in good faith and that ensure the appropriate service quality for our needs.

The HCP/KOL/GO must be approved through the Third Party Vetting procedures and digital tool of Danone.

Approvals of contracts with HCPs/KOLs/GOs must be sought in accordance with Danone's locally defined thresholds and procedures.

Our preference is to enter into written contracts with HCOs and not with HCPs directly. However, if not doable under local circumstances, we enter into contracts with HCPs and ensure that their affiliated HCOs are informed.

We ensure the contracted service does not exceed what is reasonably necessary to achieve the legitimate business need and that the payment is in line with the local Fair Market Value (FMV) and frequency matrix, as defined by the Local CC.

Fair Market Value (FMV) is an estimate of the market value that one would pay to a service provider in the HCS. The FMV must provide for lower thresholds applying to GO-HCPs than to non-GO-HCPs

We request HCPs and KOLs to make appropriate transparency disclosures on their links with Danone when performing speeches (e.g. in introductory slide) and other relevant services under this Policy.

In addition, any contractual engagement with a GO must meet the following criteria prior to the services being rendered:

- Written approval from the GO's employer / affiliated HCO, and
- Prior approval from the Local CO.

Conflicts of interests occur when the impartiality or motivation (potential, perceived or actual) for taking decisions in relation to a person or organisation may be questioned due to a personal interest or a close relationship between the one who's inviting and the invitee.

Any Danone employee with any risk of conflict of interests (whether actual or perceived) with HCPs/GOs, HCOs and POs or any business partners in the HCS must transparently declare it in writing to their **N+1 and HR Manager or the Local CO** as soon as the risk arises.



IN PRACTICE?

“ You would like to invite an HCP to an Event on Danone’s products. He asks excessive fees for giving a lecture and promoting Danone’s products. ”

➔ Overpaying an HCP in return for promoting Danone’s products is prohibited. Refer to local Fair Market Value or ask your Local CO if you have any doubt or concern about this situation.



IF YOU ARE UNSURE ABOUT A SITUATION, PLEASE CONTACT YOUR LOCAL CO

WE MUST

- ✓ Check that the services with the HCP/KOL/GO are appropriate (legitimate and professional services, fair market value...) and subject to a signed contract
- ✓ Ensure that the signed contract clearly reflects the services, deliverable and any remuneration to be provided
- ✓ Ensure that the service is actually provided in line with the contract
- ✓ Consult the Local CO in case of any doubt, especially in relation to the selection or remuneration of an HCP/KOL/GO

WE MUST NOT

- ✗ Contract with an HCP or KOL as a reward or to incentivize them to prescribe, recommend or purchase any of Danone’s products or services either in the past, present or future
- ✗ Contract with an HCP or KOL where there is a conflict of interest





HCS DONATIONS AND GRANTS

HEALTHCARE SECTOR (HCS) DONATIONS are financial or in-kind contributions granted to Eligible Recipient to support the communities in which we work (e.g. for emergency aid, to support underprivileged communities and/or social causes).

ELIGIBLE RECIPIENT is a legal entity such as a foundation, an association, a public hospital, a state university, a non-government organization, operating in or with the HCS (e.g.: a charitable trust arm of an HCO). An Eligible Recipient is always a legal entity, never an individual, whether HCP or others.

GRANTS are financial or in-kind contributions to an Eligible Recipient to support the advancement of scientific research or education, whether Danone is publicly disclosed as a Grantor or not.

An **EDUCATIONAL GRANT** is a specific amount of financial contribution offered to an Eligible Recipient for qualified recipients who intend to further pursue their education at a higher institute of learning. Duration involved is usually longer compared to Event Support (e.g. an HCO requesting for education grant for their HCP to pursue a PhD in Nutrition).

OUR POLICY

HCS Donations and Grants are only made where:

- There is a clear legitimate purpose which is in line with Danone's values and principles
- The amount requested is proportionate to the purpose.

HCS Donations can take the form of financial or in-kind contributions as follows:

- Financial support – In the form of money to support an emergency situation or communities such as funds given to an Eligible Recipient to buy non-Danone products
- Medical Equipment – Medical-practice related equipment such as Flocare pumps, personal protective equipment appropriate for use in the medical setting or medical books and journals
- Danone's products such as bottles of Danone's water brands.

For Donations and Grants related to baby formulas, please follow the requirements applicable to "Covered Products" under the Danone Policy for the Marketing of BreastMilk Substitutes.

All products or equipment donated within the Healthcare Sector must meet the Danone quality and traceability standards which are outlined in the Integrity Policy.

All Danone product donations within the Healthcare sector must be clearly labelled **"Donation – not for sale"**.



In exceptional circumstances, HCS Donations or Grants can be given to an Eligible Recipient which is a bona fide private for profit HCS entity and which have expressed a legitimate and specific need for HCS Donation which cannot reasonably be met through their normal funding or supplies. For example, a private hospital asking for a donation of medical equipment to support an emergency e.g. emergency aid to support humanitarian effort.

We never make an HCS Donation to individuals, such as HCPs, but always to legitimate legal entities. We never make Donations or Grants to Eligible Recipients chosen by HCPs or Partners.

The Eligible Recipient must be approved through the Third Party Vetting procedures and digital tool of Danone.

HCS Donations and Grants are always subject to a written request from the Eligible Recipient and followed by a written agreement as per the local Contract Policy. Any exceptions must be approved by either the Corporate Integrity Director or the SNU Compliance Director.

HCS Donations and Grants must comply with the local thresholds and approvals set by the Local CC.

The support provided must be monitored in order to ensure its use in accordance with the conditions of the Donation or Grant Agreement.

IN PRACTICE?

“ An HCO sends you a written request for a Donation specifying that they will be able to promote Danone’s products to be prescribed. ”

➔ Donations or Grants must in no way be related to any reward or obligation from the HCO or its affiliates HCPs to prescribe, recommend or purchase any of Danone’s products or services. You must politely refuse and explain that, in accordance with Danone’s Integrity & HCS Compliance Policy, HCS Donations are acts of social responsibility without any promotion-related return service for Danone.



IF YOU ARE UNSURE ABOUT A SITUATION, PLEASE CONTACT YOUR LOCAL CO

WE MUST

- ✓ Check local laws, regulations and thresholds as well as any specific applicable rules (for instance for breastmilk substitutes, food banks...) before issuing Donations and Grants
- ✓ Ensure that the actual beneficiary is approved through the Third Party Vetting procedures and tool even when the circumstances of the Donations or Grants require speed (earthquake, pandemic...)
- ✓ Sign a written agreement with clear details on the Donation or Grant purpose, amount and intended use
- ✓ Ensure that donated Danone products are labeled as “Donation not for sale”
- ✓ Properly record any Donations or Grants in the books and records and provide relevant justifications of the use for the charitable purpose expressed by the HCO

WE MUST NOT

- ✗ Accept to make a Donation or Grant to an HCP as an individual
- ✗ Accept to make a Donation or Grant if its conditions (beneficiary, purpose, use of the products/funds, milestones...) are not clearly defined and transparent
- ✗ Accept to make a Donation or Grant in return for past, present or future business



SPONSORSHIP

SPONSORSHIP is a financial or in-kind support of an activity in return for a marketing or promotion opportunity for Danone. Examples of Sponsorship can include a booth or stand at a symposium, exhibit spaces, branding banners or materials paid for by Danone at an activity or event both onsite or virtual.

OUR POLICY

We only consider Sponsorship requests from bona fide organizations which are:

- Made in writing by a HCO or bona fide event organizer
- Outlining in reasonable detail the proposed sponsored activity, the costs and the contribution requested and the associated proposed promotional opportunity for Danone
- In line with our Code of Business Conduct, policies as well as applicable law and regulations.

We only engage in Sponsorship activities with legitimate legal entities (e.g. conference organizer) and not with individuals.

The actual beneficiary must be approved through the Third Party Vetting digital procedures and digital tool of Danone.

Sponsorship must be reasonable and proportionate for the marketing or promotion opportunity for Danone.

Sponsorships must comply with the local thresholds and approvals set by the Local CC.

We always ensure that the Sponsorship is agreed in writing with the third party in a signed agreement clearly outlining in sufficient detail the activity such as the nature of event, the contribution and the promotional activity for Danone.

The support provided must be monitored in order to ensure its use in accordance with the conditions of the Sponsorship.

WE MUST

- ✓ Receive a written request clearly outlining the specific activities and costs involved in the proposed Sponsorship
- ✓ Ensure that there is a signed contract between Danone and the HCO or event organizer clearly outlining the sponsorship activities and associated remuneration
- ✓ Perform checks on the recipient organization and the legitimacy of their project
- ✓ Monitor the use of the Sponsorship in accordance with the conditions set in the agreement

WE MUST NOT

- ✗ Accept to make a Sponsorship as reward for the current, future or past purchase, prescription or recommendation of Danone's product(s)
- ✗ Engage in a Sponsorship activity where there is a perceived or real conflict of interests
- ✗ Engage in Sponsorship activities with individuals

IN PRACTICE?

“ An HCP sends you a written request for a Sponsorship of an Event that seems to be in line with Danone's Policy as well as applicable laws and regulations. ”

➔ Sponsorships must never be provided to individuals. You must inform the HCP that the Sponsorships can only be considered through their affiliated HCO or the legal entity in charge of the Event's organization.



IF YOU ARE UNSURE ABOUT A SITUATION, PLEASE CONTACT YOUR LOCAL CO



GIFTS AND HOSPITALITY

GIFTS are items of nominal value given willingly and openly to someone who is not a Danone employee without anything received or expected in return.

HOSPITALITY are meals, refreshments and or accommodation (offered to HCPs) in the course of normal business relationships, without anything received or expected in return.

OUR POLICY

As a general rule, we do not offer, nor receive Gifts, to or from HCPs, or KOLs.

We never offer practice-related equipment, such as stethoscopes. Giving medical equipment to HCS is considered as donation and must follow the Donation of equipment process.

By way of exception, we allow for small Gifts to HCPs, KOLs, HCOs or POs when it is customary, as per local social norms such as religious, cultural or professional events. Such Gifts must be:

- Infrequently offered
- Of a low nominal value and strongly recommended to be restricted only to food or flowers
- Compliant with applicable local laws, regulations and codes, whichever is stricter.

We never offer or receive Gifts in cash or cash equivalent (e.g. gift or hospitality vouchers). Gifts or Hospitality to family or friends of HCPs or KOLs are not permitted.

Hospitality can be offered as part of a normal working relationship (e.g. working lunch) only if on an infrequent basis and of a low value.

Any Gift or Hospitality under this Policy remains subject to local laws, regulations and applicable codes, whichever is stricter.

Gifts and Hospitality must comply with the reasonable pre-approved types and limits set by the Local CC.



IF YOU ARE UNSURE ABOUT A SITUATION, PLEASE CONTACT YOUR LOCAL CO

WE MUST

- ✓ Refrain from offering Gifts or Hospitalities to HCPs or KOLs
- ✓ If this is customary, check local laws and regulations as well as any specific applicable code or HCO rules before offering or accepting any Gift or Hospitality of a low nominal value
- ✓ Stay within the thresholds, limits and approval procedures set by the Local CC with regard to Gifts and Hospitalities to HCPs and HCOs
- ✓ Consult the Local CO in case of any doubt about giving or receiving any Gift or Hospitality

WE MUST NOT

- ✗ Use Gifts or Hospitality to try to influence or reward an HCP's decision, advice or professional or business conduct in general
- ✗ Give or accept Gifts or Hospitalities as cash or cash equivalent
- ✗ Offer Gifts or Hospitalities to family or friends of HCPs or KOLs

IN PRACTICE?

“ You want to offer a Gift to an HCP in order to thank them for their involvement in an important Event as a speaker . ”

➔ As a general rule, you must abstain from offering such Gifts, as Gifts to HCPs are subject to very strict laws and regulations for the purpose of preserving HCP's transparency and independence. At the same time, this HCP has been contractually paid an honorarium for his/her services rendered.



PRODUCT SAMPLES

A **SAMPLE** is a Single Unit of a Danone product provided at no cost to an HCP, HCO, Patient or consumer for them to get familiar with such product in certain situations (as defined in the Specific Rules below). Samples are not intended to be (re)sold.

A **SINGLE UNIT** is the smallest unit of the Danone product available in the country where the Sample is distributed. For example, in case of Food for Special Medical Purposes sold by packs of 4 bottles in a country (e.g. Fortini), a single unit is a single bottle and not a pack of 4 bottles. Different flavors of the same product are considered as different Single Units for sampling purposes.

OUR POLICY

Samples can only be provided to HCPs, HCOs or POs on an exceptional basis and in limited quantities for the purpose to allow the recipients to familiarize themselves with a Danone Product and acquire experience in dealing with them

Each Single Unit must be marked “**Sample/Not for Sale**” and the mark must not be easily removable.

Covered Products (as defined in the Danone Policy for the Marketing of Breastmilk Substitutes) must never be given as Samples, either directly or indirectly, to pregnant women, mothers / fathers / caregivers, or members of their families.

Samples must comply with the local yearly threshold set by the Local CC.

Local CC must ensure adequate control, accountability and traceability for Samples which are distributed in their markets.



IN PRACTICE?

“ An HCP asks for several Samples of the same product, where one Sample would be sufficient for familiarization. ”

➔ You can give Samples to HCPs strictly in the quantity necessary for them to familiarize themselves with the product. These Samples must also comply with the local applicable thresholds defined by the Local CC. In case of any doubt, ask your Local CO.



IF YOU ARE UNSURE ABOUT A SITUATION, PLEASE CONTACT YOUR LOCAL CO

WE MUST

- ✓ Ensure that Samples relate to the area of expertise of the HCP
- ✓ Restrict Samples quantities and comply with the local thresholds set by the Local CC
- ✓ Ensure traceability of the Samples given to HCPs/HCOs

WE MUST NOT

- ✗ Give Samples on a regular basis and/or in large quantities
- ✗ Give Samples for the purpose of financially enriching an HCP HCO or PO
- ✗ Give Samples as a reward or an incentive to prescribe, recommend or purchase any of Danone's products or services
- ✗ Give Samples of Covered Products either directly or indirectly to pregnant woman, mothers, fathers or caregivers, or members of their families





PROVIDING INFORMATION TO HCPs

We may disseminate scientific and factual information directly to HCPs.

In so doing, we only provide truthful, accurate and non-misleading information that is based on substantial scientific evidence or substantial clinical experience, along with a fair balance between the risks and benefits of the promoted products or services.

We follow labeling standards approved by the competent local regulator.

Product marketing of "Covered Products" and Food for Special Medical Purposes for babies is subject to restrictions under the Danone Policy for the Marketing of BreastMilk Substitutes.

Information/Educational Materials to HCPs must be:

- Scientific and educational in nature suitable for HCPs
- Clearly marked as *'For HCP use only - 'Not for Distribution to the General Public'*
- In line with all local laws including Intellectual Property
- Approved as per Danone's communication & claim validation procedures.

WE MUST

- ✓ Ensure it is scientific, factual and educational in nature
- ✓ Clearly marked as *'For HCP use only - 'Not for Distribution to the General Public'*





Speak Up!

RAISING A CONCERN

At Danone we want to know immediately about any breach or potential breach of this HCS Compliance Policy, our Code of Business Conduct, Integrity Policy or any of our compliance policies. We also want to hear about any unlawful or unethical behaviour.

Employees and external stakeholders are always encouraged to discuss any concerns they may have directly with the relevant point of contact in Danone (such as a Line Manager, HR Manager, Finance Manager, Compliance Manager or Customer Relationship Manager).



However, should employees or our other stakeholders prefer to report a concern confidentially through another channel we also have a dedicated reporting tool available called the DANONE ETHICS LINE, www.danoneethicsline.com. This tool can also be used anonymously if needed.

There will be no retaliation against anyone who reports a genuine concern. All cases will be appropriately investigated and, where breaches are found, appropriate actions will be taken.

If you want to raise a concern confidentially
via the Danone Ethics Line visit

www.danoneethicsline.com



Photos and illustrations: iStock, GettyImages, DANONE/DNC 2022



COMPLIANCE

EVERY DAY WE GO FURTHER WITH YOU