

# CODE OF ETHICS

3<sup>rd</sup> Edition



# 100 years

# Guerbet

*At Guerbet, we strive every day to improve the diagnosis and prognosis of patients, a mission that is at the heart of our Purpose.*

*Building lasting relationships to enable people to live better is only possible with impeccable ethical conduct in all our activities. Ethics is not only a pillar of our corporate strategy, but also a guarantee of sustainability and credibility. We are all committed to respecting the principles of integrity, honesty, fairness, and transparency in the conduct of our activities. The Code of Ethics is a reference document that guides our choices and actions. If in doubt, do not hesitate to talk to your manager or Human Resources.*

*The Guerbet Ethics Alert Line reporting platform is also available to report any practice contrary to the Code of Ethics. Ethics is a duty for each of us. Let's all be committed to respecting this Code on a daily basis.*

**The Group's Executive Management  
The Board of Directors of the Guerbet Group**

## WHO IS THIS CODE OF ETHICS FOR?

- Everyone. All Guerbet employees. All Guerbet departments. All of the Group's businesses. All over the world. It is also applicable to temporary staff and external partners working on our behalf.
- As such, each of us must read and refer to it and comply with its principles and rules, which govern our day-to-day behavior.



## HOW AND WHY SHOULD WE USE THIS CODE OF ETHICS?

- The process is simple. This code covers all areas that form the foundation for the company's reputation. It guides our actions, informs our choices, and reinforces our ethical principles in the course of our day-to-day work.
- Its rules apply most notably to situations that are likely to raise ethics or integrity issues. Each of us must be able to consult it in order to decide how to proceed in delicate situations.
- However, this code cannot respond to or deal with all situations exhaustively. That is why we use policies and procedures, training courses, and other internal resources (managers, referents or experts, etc.) to transpose it into practice, to provide you with additional assistance.
- This code is unique to us, as in addition to being a reference for our internal dealings, it reflects the complexity of our business, echoing its human and strategic challenges. It allows us to position ourselves with our stakeholders and move forward with confidence. This Code of Ethics does not belong to any other company. It conveys our values, represents our beliefs, and reflects who we are.



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## HOW TO REPORT AND EXPRESS YOUR CONCERNS

We encourage you to express your concerns directly to your manager or your HR, Legal or Compliance Manager, depending on the situation.

The Guerbet Ethics Alert Line has also been specially developed for this purpose and can be reached at this address:



<https://report.whistleb.com/en/GuerbetEthicsAlertLine>

It is open to everyone, anywhere in the world, including company employees and external business partners, and is available in the main spoken languages within the group. Reports may be made anonymously.

For more information, the Group has developed a procedure describing how reports are collected, processed, and managed securely and confidentially.



## RESPECTING OUR EMPLOYEES

**Respecting our employees is one of our central concerns, as evidenced in our "CARE" value.**

The Group believes that the men and women working at the company are the driving force behind its success. Their well-being and safety are a guarantee of lasting performance. Within this people-friendly framework, Guerbet relies on a strong health and safety culture, promotes diversity, does not tolerate any discrimination or harassment towards others, and bases its sustainable development on listening and social dialogue. The group is committed to respecting and promoting the fundamental conventions of the International Labour Organization (prohibition of child labor and forced labor, non-discrimination in employment, respect for union rights).



## HEALTH AND SAFETY

At Guerbet, the health and safety of our employees and external contractors is our top priority. "Zero accidents" is our goal now more than ever. With this in mind, the Group is pursuing a policy of continuous improvement. It complies with the applicable laws and regulations in this area, wherever it conducts its business.

How do we do our part as employees?

- We understand the risks and apply and enforce the Group's rules and best practices for occupational health and safety.
- We escalate suggestions for improving health and safety to our manager and/or our local EHS Manager.
- Without putting ourselves at risk, we move to stop any hazardous situations that have been detected by delaying them or correcting them ourselves.
- We work proactively to ensure our collective safety by taking care of ourselves, our colleagues, and our work environment.
- We report to our manager any health and safety deviations, risks, and events (incidents, near misses, accidents) that we may notice.
- We participate in the implementation of occupational health and safety initiatives.



### FOR MORE INFORMATION

If you have any questions about health and safety, you should consult your manager or your local EHS Manager.



**There was a hole in the ground in the parking lot, and I tripped. Luckily I didn't hurt myself. Do I have to report this near miss?**

Yes. The Guerbet procedure specifies that all incidents, near misses, and accidents, including any first aid, must be reported to your manager or via the existing tracking system. This is crucial for eliminating or reducing the risk, and thereby preventing any accident from occurring or reoccurring. Sharing your experiences helps to improve safety for all Group employees.

**I notice that a colleague or a contractor uses a cutter without wearing gloves. I am not their manager and I am not part of the EHS team. Should I intervene to stop this situation?**

Yes. This is a situation that can lead to a serious accident. In this case, we all have a duty to act by immediately putting a stop to the situation and initiating a discussion on how to work safely.



## PROMOTING DIVERSITY AND COMBATING DISCRIMINATION

Guerbet believes that employee diversity is an asset as well as an opportunity to develop the Group's sustainable performance, innovation, and creativity. Guerbet promotes inclusion, applies zero tolerance in the fight against discrimination in all its forms, and incorporates these topics into its managerial training.

How do we do our part as employees?

- We promote diversity, regardless of gender, age, marital status, sexual orientation, disability, national or ethnic origin, or religious or political beliefs, in recruitment and career development.
- We report any act of discrimination that we may experience or witness using the resources and mechanisms made available to us by the company.
- We strive to ensure that what we say to others never appears inappropriate or is misinterpreted.
- We are aware that there are severe professional and criminal penalties for any form of discrimination that has the purpose or effect of violating dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.



**I am in a meeting with male colleagues to present the five-year sales forecast. Someone mentions that the skirt that I'm wearing alleviates the bad news, and I receive a few teasing comments. What can I do?**

You should feel free to react immediately to these unacceptable comments. In addition, it is important for the meeting organizer to intervene to correct this behavior and remind the participants of our "CARE" value. Finally, you can refer the matter to your manager or HR Manager.



### FOR MORE INFORMATION

If you have any questions about discrimination, you can contact the Legal Department or the Human Resources Department.



## COMBATING HARASSMENT

**Guerbet is committed to maintaining a safe and peaceful work environment, free of any acts, comments, or behaviors likely to constitute a form of harassment. Accordingly, the Group condemns all types of harassment toward others, whether psychological or sexual, and applies a zero-tolerance policy in this area.**

How do we do our part as employees?

- We can reach out to the Group’s liaison staff, who are recruited by Human Resources, or to the HR team. These volunteers are here to listen to any employee who does not feel comfortable in their professional environment, especially in the event of harassment.
- We take part in harassment awareness training courses developed for managers by the Human Resources Department. These courses meet the most rigorous standards in this area.
- We encourage all employees to speak out in the event of harassment and not to continue suffering.
- As managers, we are particularly attentive to maintaining respect between employees and ensuring there is no aggression, disparagement, or discrimination toward others.
- We are aware that there are severe penalties for any proven act of psychological or sexual harassment.



***After a meeting, one of my colleagues offers me a drink with them. I refuse, but they heavily insist, claiming that it’s just about discussing a project that we have to present at the end of the month. This is at least the third time that they have been this persistent. What can I do?***

*This type of behavior is unacceptable at Guerbet. You are strongly encouraged to share this with your manager and with Human Resources.*

**FOR MORE INFORMATION**

Contact your HR Manager or meet with your liaison.



## SOCIAL DIALOGUE

**The Group has always encouraged dialogue with employee representative bodies, which it considers to be full-fledged partners. For Guerbet, social dialogue is conducted on the basis of mutual trust. It can be a lever for performance and a driver of transformation. It is based on transparency, communication, respect, and a shared commitment to achieving results. Similarly, union rights are recognized and respected in all countries where Guerbet operates.**

How do we do our part as employees?

- We can freely join the union of our choice.
- We can participate in the election of employee representatives.
- To answer any questions or address any individual or collective issues, we can directly contact employee representatives, employee representative bodies, or trade unions, depending on the country.

**FOR MORE INFORMATION**

Contact the Human Resources Department or employee representative bodies in your country.

A photograph of a patient lying on a medical table in a clinical setting. A healthcare professional's hands are visible, gently resting on the patient's head. The patient is wearing a white hospital gown and blue pants. The background shows a clean, modern medical environment with a light blue wall and a white ceiling light fixture.

## RESPECTING PATIENTS AND HEALTHCARE PROFESSIONALS

**It is essential for Guerbet employees to meet the expectations of patients and healthcare professionals** by ensuring the availability of safe, effective, and high-quality products and services, as well as by disseminating useful, reliable, and substantiated information. In addition, Guerbet manages its interactions with healthcare professionals in strict compliance with local regulations. The Group interacts with patient associations and patients in a respectful and transparent manner.



## PRODUCT QUALITY AND SAFETY

**At Guerbet, patient safety is our top priority. Our commitment to quality is reflected in our robust quality management system, comprehensive drug safety and medical device monitoring processes, and our continuous improvement program. We design and manufacture contrast media and medical devices that offer a favorable benefit/risk balance, ensuring the highest standards of safety and efficacy. We comply with all current legislation, and best practice guidelines and adhere to rigorous testing protocols.**

How do we do our part as employees?

- We are deeply committed to our Guerbet Quality Policy, consistently implementing top standards for quality, safety, and product traceability.
- We take responsibility for the quality and performance of our products and services engaging all stakeholders in the value chain. Together, we ensure patient safety at every stage of our operations.
- We strictly follow our quality policy, and best practice procedures to guide our daily operations.
- We regularly reassess the benefit/risk balance of our products by monitoring global scientific literature, conference presentations, and adverse events reported to Guerbet.
- We address customer questions and complaints promptly and efficiently to improve our products and services. We implement proactively continuous quality assurance measures to ensure customer satisfaction and trust.
- We foster quality through Quality by Design principles, keeping our products, methods, and processes innovative for the benefit of our patients.

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### FOR MORE INFORMATION

If you have questions about the quality and safety of our products, please refer to the Guerbet Quality Manual on [guerbet.com](http://guerbet.com).

You can also contact the Quality Department.



***There's a problem with my production line. The line might be working, but I have doubts and I'm afraid that the quality of the products will be affected. What should I do?***

*If you encounter a problem on a production line that may impact product quality, you should immediately notify your supervisor or the local quality manager. If the quality problem is verified, always make sure that this information is immediately reported and documented.*



## PRODUCT INFORMATION

**Guerbet pursues a policy of responsible promotion and respects the patient-physician relationship. As such, the Group is careful to disseminate objective, non-misleading information that supports the rational use of its products. All promotional materials are duly checked and approved to ensure regulatory compliance.**

How do we do our part as employees?

- We comply with all regulatory requirements governing the promotion of drugs and medical devices
- Since our contrast media are prescription drugs, promotion is exclusively reserved for healthcare professionals, and we do not advertise them to the general public.
- We verify promotional information before broadcast, from a scientific, technical, regulatory, legal and ethical point of view, depending on the product.
- We promote our prescription products only for indications duly approved by the competent health authorities.
- We ensure that all promotional information about our products is based on relevant data and evidence.



***I would like to promote a Guerbet product at an international conference that is not registered in every country in the world. Is that allowed?***

*Yes, that is allowed only if it is authorized by the regulations of the country in which the conference takes place and complies with the conditions that accompany this authorization. You should therefore contact the global Compliance Manager for more information.*

***As a Guerbet employee, can I retweet a statement from a healthcare professional praising one of our pharmaceutical products?***

*No. Such an action can be construed as public promotion. Contrast media are subject to medical prescription, and therefore public promotion is prohibited by law. As such, you should not relay this message.*

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### FOR MORE INFORMATION

Refer to the Group's policies on promotional practices. Depending on the situation, you can also contact your manager, your Compliance Manager, or the Legal Department.



## INTERACTIONS WITH HEALTHCARE PROFESSIONALS

**Guerbet favors scientific interactions with healthcare professionals to support research or medical training, in compliance with applicable regulations. To avoid any risk of conflict of interest that could harm public health, the Group disclose its interactions with healthcare professionals in accordance with applicable regulations. To protect patient health, Guerbet respects the independence of healthcare professionals and requires its employees to behave ethically in their business practices.**

How do we do our part as employees?

- We ensure that our interactions with healthcare professionals are lawful and appropriate to preserve their independence.
- If we are involved in sales, marketing, promotion, research or product development, we ask the local Compliance Manager for information on the applicable requirements and codes of conduct in the country of practice of the healthcare professional with whom we are interacting.
- Any research, consulting, assessments, training, or conference presentations performed on behalf of Guerbet must be formalized by a contract. We undertake to ensure that the associated payments and allowances comply with the limits described in our internal rules and are disclosed publicly in accordance with applicable regulations.
- Donations to support research or training for healthcare professionals are subject to an internal compliance review
- We verify that providers who are likely to interact with healthcare professionals on our behalf comply with the applicable regulations in this area.



### FOR MORE INFORMATION

 Refer to the Group's policies on interactions with healthcare professionals. If you have any questions or concerns, you can also contact your local Compliance Manager.



***I would like to contact a radiology expert/hospital practitioner to give a presentation at an international conference. He would like his travel and hotel expenses to be covered by Guerbet. Can I agree to this?***

*Travel and accommodation costs may be covered if they are related to a legitimate service and limited to a reasonable amount. This coverage must always be approved by your supervisor and the global Compliance Manager to ensure that you are complying with Guerbet policy and the applicable regulations in the country where the healthcare professional practices.*



## INTERACTIONS WITH PATIENT ASSOCIATIONS

**Patients are at the heart of what we do. The Group interacts with patient associations and patients themselves in a transparent and non-promotional manner. We work with them ethically and legally, from the early stages of development through to market launch and beyond. By exchanging views and listening to patients' experiences and the challenges they face, we can shape the future of medical research and disease management, from diagnosis to treatment, to better address unmet patient needs. Only through open and transparent dialogue between patients and the industry can we ensure that the patient's perspective becomes an integral part of the way diagnostics, drugs, and medical devices are researched, developed and delivered to patients. The rules for collaboration between Guerbet, patient organizations, and patients are defined in a dedicated corporate policy to ensure transparent and ethical relationships.**

How do we do our part as employees?

- We have partnerships with patient associations that allow us to further our knowledge of patient pathologies, improve the information provided to patients on products and services, and optimize the care they receive.
- We provide factual information that is reliable and based on scientific evidence.
- We guarantee safety and protect the rights of patients who participate in clinical trials.



***I am a Guerbet employee, can I have contact with a patient association?***

*Yes, but you must disclose your position at Guerbet and meet with them in a specific, non-promotional setting.*

***I'm meeting with a patient association. Can I talk about Guerbet products and services?***

*Yes, you can mention them, but you must be careful not to promote them commercially so as not to induce sales or make the members of the association uncomfortable.*



### FOR MORE INFORMATION

 For further information, please refer to the Group's Patient Relations Policy and contact the global compliance manager.

# ACTING WITH INTEGRITY IN BUSINESS AFFAIRS

**Guerbet aims to be a trusted partner for all its stakeholders.**

The Group conducts its business with ethics and integrity, two essential principles for establishing and maintaining credibility. For this reason, Guerbet does not tolerate any practice that could cast suspicion on the honesty of its employees or its activities, such as unfair trading practices, corruption, conflicts of interest, irresponsible purchasing, or lobbying that does not comply with applicable rules.





## COMMERCIAL AND FAIR COMPETITION LAW

Guerbet respects the rules of open, fair and honest competition wherever the Group operates. As such, it prohibits any price fixing, protects its customers and partners against unfair commercial practices, and is committed to gathering relevant competitive intelligence.

How do we do our part as employees?

- We follow sales processes and the rules for proper bidding in all the countries where we operate.
- We refrain from any exchange of sensitive commercial, financial, or other information with competitors or any prohibited commercial practices (cartels, price fixing, collusion on production/sales volumes or costs, market sharing; etc.).
- During conferences or professional association meetings, we observe the same rules as those applicable to our competitors, and we prohibit any detailed discussions contrary to competition law. When in doubt, we abstain from or leave the meeting immediately and maintain a record of our refusal or opposition. In addition, we inform our supervisor and the Legal Department as soon as possible.
- We refrain from seeking out any information on our competitors through corporate espionage, theft, bribery, or any other illicit methods.



### FOR MORE INFORMATION

 If you are looking for further information or advice on business practices, please contact your business manager or the Legal Department.



*I am attending a conference and meet a former colleague who works for a competitor. He invites me to have coffee near our stand and asks me how the business is going, and whether I managed to get better prices in the geographical region he was in charge of. How should I respond?*

*You should suggest that he move away from our stand and tell him that you do not wish to discuss business or prices because it is forbidden for competitors to discuss these topics. Then, talk to your manager and, if necessary, the Legal Department.*



## COMBATING CORRUPTION

Under the French anti-corruption Law Sapin II, the US FCPA and the UK Bribery Act, Guerbet is actively combating corruption and influence peddling with a specific program. The trust of our stakeholders and our long-term success depend on it. Vigilance is therefore essential for everyone, regardless of hierarchical level or workplace, particularly in relations with customers, distributors, agents, suppliers, prescribers, public officials, and intermediaries.

How do we do our part as employees?

- We are prohibited from promising, granting, or paying any benefit to a "public official" who may be an agent of government or any administrative authority, particularly if they are involved in health policy, health enforcement, or act under any administrative authorization.
- We are prohibited from offering or giving any benefit to any healthcare professional with the intention of improperly influencing their decision to prescribe, recommend, purchase, or supply our products.
- We do not seek gifts for ourselves or our family members from an individual or legal entity with whom we maintain commercial relations, and we do not accept such items if they are likely to influence us or give the impression of influencing Guerbet's decisions.
- We do not make any facilitation payments to expedite certain administrative procedures initiated or imposed on our company.
- We ensure that any providers or distributors who may interact with other parties on our behalf follow anti-corruption laws and adhere to Guerbet's ethical values.




*Our distributor says he can get a new contract with a large radiology center if we make a donation to a charity. I think the president of this association is the brother of the head of the radiology center. What should I do?*

*Do not make the donation and report the matter to the Compliance Department. This appears to be an attempt to disguise a bribe as a donation. A dishonest distributor or agent may also charge higher than expected fees or commissions. It may use part of them to bribe the agents responsible for issuing the contract.*



### FOR MORE INFORMATION

 If you need more information, you can consult the Group's anti-bribery policy or contact the Group Anti-corruption Manager.



## CONFLICTS OF INTEREST

The personal, social, financial, or political relationships or interests of Guerbet employees or their family members may conflict with those of the Group. In this case, Guerbet expects its employees to be transparent about relationships or activities that may influence their decisions on behalf of Guerbet, and to protect the interests of the company without deriving any personal benefit.

How do we do our part as employees?

- The decisions we make always protect the interests of the company.
- Our professional activities must not be exploited to yield any personal benefit for ourselves or Close relatives at the expense of the Group's interests.
- In accordance with the procedures in force, we notify our supervisor in writing of any real or potential conflicts of interest, so that the company can determine an appropriate response to each situation.
- We do not accept gifts from third parties (suppliers, distributors, etc.).
- We decline all invitations to events, meals, and other hospitality requests that could compromise our independence or distort our judgment regarding a third party, or be perceived as such.



### FOR MORE INFORMATION

If you have any questions or concerns regarding conflicts of interest, please contact your manager, your local HR manager, or refer to the Group's conflict of interest policy.



**For one of my projects, I would like to suggest a supplier run by my brother-in-law. What precautions should I take?**

In this case, there may be a conflict of interest, so you must inform your manager, explain and document the situation in a transparent manner, and refrain from participating in the decision to list the supplier. However, please keep in mind that even the appearance of a conflict of interest must be avoided.



## RESPONSIBLE PURCHASING

Guerbet pursues a responsible purchasing policy that seeks to cultivate collaborative, balanced, and healthy relationships with its suppliers. Guerbet asks its procurement employees to act in accordance with an Ethical Purchasing Charter. The selection criteria for our providers rely on open and fair competitive bidding rules. In addition, Guerbet only works with principled suppliers who respect human rights, labor laws, the environment, and business ethics.

Guerbet has decided to promote its social and environmental values to its suppliers and to ask them to do the same with their own economic partners.

How do we do our part as employees?

- We follow our Ethical Purchasing Charter, and we make sure that we do not accept, either directly or indirectly, gifts, favors, benefits in kind, commissions, or money payments.
- We do not provide their competitors with any information collected from a supplier during a negotiation or a call for tenders.
- The creations offered by a contractor are subject to copyright and cannot be used without prior agreement.
- Listed providers must reflect our values. For example, we reject any supplier who uses forced labor, child labor, or illegal labor, and who does not ensure safe and healthy working conditions for their employees.



**I am conducting a call for tenders for our office supplies. The first supplier I contacted offers high-quality products, but they're expensive. Two other suppliers don't have products that are as good, but they're cheaper. Can I tell the first one about the answers I received from the other suppliers, to try to get them to lower their prices?**

No. You can tell them, in a very general way, that other suppliers offer you better prices, but without revealing the prices or the identity of the respondents to your call for tenders. Otherwise, you would be giving them confidential information about their competitors, which would be unethical and, in many countries, against the law.



### FOR MORE INFORMATION

If you have any questions about responsible purchasing, please refer to the Ethical Purchasing Charter, the supplier Code of Ethics, or contact the Purchasing Department.



## LOBBYING

To help our stakeholders understand the challenges facing Guerbet, we strive to explain what we do, why we do it, and how it impacts the company. In a spirit of accountability and transparency, Guerbet participates in constructive dialogue with public authorities and their representatives in charge of drafting laws and regulations that impact our business. Guerbet complies with the local regulations in force and is recorded on transparency registers, where applicable. Guerbet has no political affiliations.

### FOR MORE INFORMATION

If you would like more information on lobbying for Guerbet, please contact your local management or the Group Public Affairs Department.

What is our role as employees?

- All the information we provide to public authorities is accurate, precise, and substantiated.
- We do not influence decision-making bodies with misleading or erroneous information, or by offering compensation or any other benefit.
- We do not fund or support any political party, politician, or other political institution on behalf of Guerbet.



**A bill is being drafted in the country where I work for Guerbet; can I go and promote the Group's position to a member of a committee or Congress?**

Yes, but before taking any action, you must first report to your supervisor and/or your subsidiary management so that this plan is approved and coordinated with other possible initiatives. Before attending any meetings, you will have to prepare a written memo on the information you wish to convey to this elected official.

**I am a candidate in an election, can I ask for support from Guerbet?**

Guerbet respects everyone's political opinions and personal commitments. These beliefs must solely be expressed in a personal capacity, never on behalf of Guerbet. Other colleagues may provide you individual and personal support for political activities, but this support cannot be construed as Guerbet support. As such, under no circumstances can you claim to have the Group's support in your efforts. Similarly, an employee involved in a political campaign may not use company resources (work time, photocopiers, equipment, etc.) for this purpose.

# RESPECTING THE COMPANY

Guerbet



**Guerbet employees are committed to protecting the Group's facilities that they work in.** They are careful to uphold the company's brand image in their actions and statements. They shall refrain from using the Group's tangible or intangible assets for personal purposes, including any private data or confidential information they may have in their possession. They are also careful not to commit insider trading.

## PROTECTING THE GROUP'S ASSETS



Guerbet's assets consist of tangible assets (buildings, industrial equipment, information technology, raw materials, etc.) and intangible assets (know-how, trademarks and patents, industrial processes, image and reputation). These assets allow us to implement our strategy, achieve our objectives, and ensure our longevity.

How do we do our part as employees?

- We use company assets efficiently and for business purposes and take any necessary measures to protect them from damage, loss, or theft.
- We refrain from using the company's tangible or intangible assets for our personal benefit or the benefit of a third party.
- We maintain our assets under optimal conditions and regularly conduct inventories of our physical assets, including when they are with third parties.
- We avoid removing any property from Guerbet premises unless it is properly authorized and essential for our business operations.
- We secure access to our premises, our network, and our information systems.
- We comply with the Group's IT security rules: for example, we do not share our passwords or personal access codes, and we are particularly careful when receiving e-mails from unknown senders or individuals pretending to be an acquaintance.
- When an employee leaves the company, each manager ensures that the assets assigned to them are returned to the company, and that their access to the information systems is deactivated in a timely manner.



**Someone I don't know is on our premises without an identification badge or a Guerbet representative. I'm not sure they're allowed to be here, what should I do?**

Only duly authorized individuals are allowed on a company site. In the case of a third party, a Guerbet representative must ensure that this person complies with access and security rules. Check with this person and, if necessary, direct them to the reception desk and inform your manager or the Security Department.

**I've just admitted an external consultant who wants to connect to the company network with his network cable. Is this allowed?**

No, if he needs to access the Internet, he must use the Wifi Guest. You must not allow anyone from inside or outside the company to connect a computer not supplied by Guerbet to the company network and must notify your manager and the IT Department if necessary.

### FOR MORE INFORMATION

If you would like more information or have a question about protecting Guerbet assets, please contact the Group's Internal Control Department or the Group's Chief Information Security Officer.

## EXTERNAL COMMUNICATION



Group employees are required to communicate responsibly and to pay close attention to the statements they make to the outside world. As a publicly traded company, any communication to the media can affect the interests and reputation of the company. External communication has an impact on Guerbet's image and must be carefully prepared.

How do we do our part as employees?

- We do not speak on behalf of Guerbet if we are not duly authorized to do so or we do not have prior approval from the Group Communications Department.
- If we are contacted by a journalist, we will coordinate in advance with the Group's Communications Department before answering any questions from the media.
- We shall refrain from making any disparaging remarks.
- We are very careful when communicating on social media: we comply with the regulations governing our products (pharmaceuticals and medical devices), we do not publish sensitive or confidential information, and we respect image rights.



**Can I post photos of a Guerbet event on my LinkedIn, Instagram, or personal Facebook account?**

No. You should never post images related to a pharmaceutical product that would be construed as public promotion, just as you would be very careful not to publish inappropriate images or reveal sensitive or confidential information about Guerbet. If in doubt, you should consult the Group's Communications Department.

### FOR MORE INFORMATION

Please consult the group's procedures for communicating with the media and using social media, which are intended for all employees.

If you have any questions or if you have noticed any negative information or comments about Guerbet, please contact the Communications Department immediately:

[direction.communication@guerbet.com](mailto:direction.communication@guerbet.com)

Any online reference to an undesirable event that is spotted by a Guerbet employee must be reported in accordance with the local procedure.

## PROTECTING PERSONAL DATA

Guerbet has implemented a data protection policy in compliance with the General Data Protection Regulation (GDPR). As such, Guerbet implements technical and organizational measures to protect the rights of the stakeholders (employees, customers, healthcare professionals, patients) with whom it interacts.

How do we do our part as employees?

- We are all required to comply with the Guerbet data protection policy. Accordingly, we strive to limit the collection of personal data to what is strictly needed for our business.
- We respect the purpose of the data processing, and in this regard, we do not transfer, exchange or disclose personal data in an unauthorised manner.
- Where applicable, our service providers are required to implement appropriate technical and organisational measures to protect personal data entrusted to them by Guerbet.
- We are required to follow awareness training on the basic rules of personal data protection.

### FOR MORE INFORMATION

Refer to the Guerbet data protection policy or contact the Group Data Protection Officer

[dataprotection.officer@guerbet.com](mailto:dataprotection.officer@guerbet.com)

whose role is to monitor company compliance with the EU General Data Protection Regulation.



**My laptop hosts a file with various customers or prospects, which only I know about or work with. Can I use or keep it?**

No, personal customer data is supposed to be administered by the customer relationship management tools set up by the company. Holding a customer's personal data on a medium not approved by the IT Department (USB key, external hard drive) would also present a security risk.

## PROTECTING CONFIDENTIAL INFORMATION

A significant portion of confidential information is part of Guerbet's intangible assets. Unauthorized disclosure of confidential information, even if unintentional, can cause significant harm to the Group. It is therefore of key importance that we are all aware of this, especially when we access sensitive information. We must be able to control the degree of confidentiality of information, as well as the appropriate safeguards to be implemented on such when disclosing them internally or to third-parties.

How do we do our part as employees?

- We protect internal, non-public information that is the property of the Group, or any information entrusted to us by a third party, in accordance with current Group Confidentiality policy.
- This information should only be retained, printed, scanned, copied, transferred, or destroyed according to the means described in this policy.
- With regard to Research and Innovation, we enforce contractual commitments relating to the protection of the results of collaboration with third parties.
- We do not disclose any information about ongoing research and development activities, or any other confidential information, without prior internal agreement.



**I am working on a project that needs to remain confidential until a certain date. I need to discuss the project with a colleague via e-mail and send an attachment that I have received earlier from a third party. I accidentally write to this third party while trying to send a message to my colleague about the confidential project. I realize my mistake too late, what can I do?**

Employees must ensure that a confidentiality agreement is in place with such third party. In this case, the email sent inadvertently must be recalled. If it cannot be recalled, the employee must send an e-mail as soon as possible to inform the third party that he/she has mistakenly received confidential information that was not intended for him/her. The employee must also ask the third party for immediate confirmation that the e-mail has been deleted. The incident must be reported to the project manager.

### FOR MORE INFORMATION

For more information, please refer to the Group's confidentiality policy or contact the Legal Department.



## PREVENTING INSIDER TRADING

Guerbet is a publicly traded company. All financial communication is regulated and supervised by the **Autorité des Marchés Financiers, or AMF (French Financial Markets Authority)**. In this context, insider trading is defined as the use or disclosure of privileged information (results of clinical trials, mergers and acquisitions, corporate strategy, new markets, etc.) for personal purposes, which could affect the Group's share price. Such insider trading is strictly prohibited by law and is subject to criminal penalties.

### FOR MORE INFORMATION

For further information, please refer to the Group's Insider Trading Prevention Procedure, or contact the Legal Department.

How do we do our part as employees?

- If, in the course of our work, we become aware of privileged information, we do not use it to trade in Guerbet securities.
- Managers, employees, and people who have access to privileged information do not use it or put themselves in a position where they are suspected of having used it, particularly in the lead-up to the announcement of financial results or "significant" transactions.
- We comply with the applicable laws and with the Group procedure for preventing insider trading and selling and purchasing securities (applicable to Guerbet employees and corporate officers, as well as their immediate family members).



***I'm an operator on a production line, and I'm proud to be working on a new molecule that could revolutionize one of our markets. Can I talk about it with my friends and family?***

*No. You may say that you are working on a new product, but you may not give any further information that could fall into the wrong hands and influence Guerbet's share price.*

A hand wearing a blue nitrile glove holds a clear glass test tube over a body of water. The test tube is tilted, and a single drop of liquid is falling from its tip, creating concentric ripples on the water's surface. The background is a blurred natural setting, possibly a stream or river. The overall image conveys a message of environmental care and scientific precision.

## PRESERVING THE ENVIRONMENT

**Guerbet is fully aware of the environmental challenges facing the world and pursues its development in a sustainable manner.** The company is committed to reducing its environmental footprint across all of its operations, from raw material sourcing to the production of contrast media and medical devices, through to customer delivery. The Group is committed to controlling its processes and waste, while innovating to reduce their impact. The Group is mindful of the challenge of global warming. All these initiatives are conducted in strict compliance with applicable regulations and standards, wherever Guerbet operates.

## CONTROLLING AND REDUCING OUR ENVIRONMENTAL IMPACTS

Guerbet implements solutions to protect the environment by controlling its industrial facilities and taking steps to reduce its environmental impacts throughout its value chain from the supply of raw materials to the end of product life, from the design stage (using natural resources sustainably, controlling production processes, developing innovative processes, and controlling various types of waste).

How do we do our part as employees?

- We consider the environment from the design stage of our projects and select suppliers based on environmental criteria.
- We foster environmental awareness both individually and as citizens, encouraging daily actions to reduce carbon emissions, such as choosing eco-friendly transport for business trips and driving responsibly.
- We practice the 3Rs—Reduce, Reuse, Recycle—in all our procurement to preserve natural resources and limit plastic use.
- At work, we control waste and reduce energy consumption by promoting energy efficiency, turning off lights when not in use, and minimizing air conditioning.
- We promptly report any situations that could impact resources or generate excessive waste, and we follow instructions to prevent environmental accidents.



**I see a water leak. Should I intervene to stop this situation?**

Yes. It is your responsibility to act, either by stopping the situation if it is feasible and safe to do so, or by reporting it immediately.

**A control system that prevents pollution is out of order. I just learned that it will take several days before it can be repaired. I am afraid that reporting it will force us to stop production, when we are already very behind schedule. What should I do?**

You should report this situation as soon as possible to your manager or your local EHS manager so that you can work together to find a solution. If necessary, production will have to stop.

### FOR MORE INFORMATION

If you would like more information or have any questions, please refer to your manager or your EHS manager.

## COMBATING CLIMATE CHANGE

As a socially responsible company, Guerbet develops programs to account for the risks of climate change and reduce its carbon emissions.

How do we do our part as employees?

- Whenever possible, we use maritime transport rather than air transport to ship our products.
- We conduct a continuous improvement program for suppliers with the largest carbon footprint, or we select those with the smallest footprint.
- We take action at our industrial sites to limit our greenhouse gas emissions.
- We use remote means of communication such as videoconferencing, and thereby limit our travel.



**I need to buy some equipment, and I obviously take into account the budget when making these purchases. Do I have to buy the cheapest products?**

No, this is not the only criterion. In addition to price, you must also look at their impact on the environment and climate change (reduced energy consumption, recyclable material, share of recycled material, etc.).

### FOR MORE INFORMATION

If you would like more information or have any questions, please refer to your manager or your local EHS manager.

[www.guerbet.com](http://www.guerbet.com)

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**Failure to comply with applicable local law, specific regulations, and Group procedures incorporating them can have serious consequences not only for Guerbet, but also for anyone involved. Violation of the laws and regulations referred to in the various chapters of the Code, in particular those relating to competition and anti-corruption laws, may be subject to civil or criminal penalties or potential legal actions.**

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