Ipsen Code of Conduct
2026



Production line at Ipsen Biopharm Ltd,
a pharmaceutical product manufacturing site
UK



Dear Colleagues,

At Ipsen, we believe everyone deserves a life fully lived. Our sustainability strategy focuses on four areas, Access to Healthcare, Human Impact, Climate Action, and Responsible Business, reflecting our commitment to creating positive impact for patients, people, society, and the environment. Powered by Generation Ipsen, our global teams work together to integrate sustainability into the way we operate and deliver on our purpose.

This Code of Conduct is a tool that has been designed to guide us in our daily decision-making. We are each responsible and accountable for our individual actions and Ipsen's reputation is in the hands of each and every one of us.

I trust all Ipsen employees across each level of the organization to adhere to this Code and fully embody its values in their actions and behaviors. I expect our leaders and managers to lead by example, acting as role models.

I believe in a culture of openness and speaking up. I strongly encourage you to seek advice or help if you have any questions or concerns.You can reach out directly to your manager, Human Resources or Business Ethics. However, if you prefer, you can always use the designated Whispli Alert Platform (https://app.whispli.com/IpsenAlerts) or send an email to: Ipsen.Ethics.Hotline@ipsen.com. All alerts will be treated with the highest level of confidentiality and professionalism.

Every member of our Board of Directors and the Executive Leadership Team (ELT) personally commit to this Code of Conduct and I expect the same commitment from each of you.

Thank you for continuously doing your best for each other, for patients, for our communities, society and the environment.

David Loew
Chief Executive Officer


OLIVIA BROWN
Executive Vice President,
Global Head of Neuroscience
and Aesthetics


JOSEP CATLLÀ
Executive Vice President,
Chief Corporate Affairs Officer


ANDREAS GERBER
Executive Vice President,
Head of International


CHRISTELLE HUGUET
Executive Vice President,
Head of R&D


AYMERIC LE CHATELIER
Executive Vice President,
Chief Financial Officer

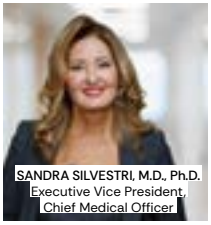

PIERRICK LEFRANC
Executive Vice President,
Head of Technical Operations


PHILIPPE LOPES-FERNANDES
Executive Vice President,
Chief Business Officer


RÉGIS MULOT
Executive Vice President,
Chief Human Resources Officer


LAURA RÉVEILLON, Ph.D.
Executive Vice President,
Strategy & Transformation


MARI SCHEIFFELE
Executive Vice President,
Chief Product Officer and
Head of GPPS


SANDRA SILVESTRI, M.D., Ph.D.
Executive Vice President,
Chief Medical Officer


CAROLINE SITBON
Executive Vice President,
General Counsel


MICHELLE WERNER
Executive Vice President,
President of North America

PLEDGE FROM THE EXECUTIVE LEADERSHIP TEAM

As members of the Executive Leadership Team,

We, individually and collectively, commit to this Code of Conduct and to the Ipsen Way of Being, to act together for the benefit of patients:

WE LEAD WITH PURPOSE

WE LEARN AND SHARE EVERY DAY

WE DRIVE FOR SUCCESS

WE TRUST EACH OTHER

WE OWN THE OUTCOME

We are committed to behaving in a way that reflects our values in line with Ipsen's culture.

We are committed to conducting business with agility and accountability, promoting the highest ethical standards across the company.

We are committed to a transformative sustainability strategy.

We are committed to enabling and empowering every employee to make the Ipsen Way of Being a reality.

We count on your commitment.

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Ipsen Pharma Biotech
a pharmaceutical product manufacturing site
France

1 WE CARE FOR OUR EMPLOYEES



At Ipsen, we believe our employees should feel safe and respected at work at all times. We foster a culture of respect and transparency so that our employees can work in an environment which is safe, free from discrimination, harassment or any other form of unfair treatment.

PROVIDE A SAFE WORK ENVIRONMENT

Ipsen provides a safe working environment which is key to protecting its employees, its partners and the environment, and contributes to performance excellence.

Ipsen sets global standards for all aspects of its business operations , and is committed to continuous improvement through our ISO 45001 and 14001 accredited Environment, Health & Safety Management System.

- **We care for our people** and integrate safety principles into all aspects of our business, all the way from the research and development of our products, through to supply chain, manufacturing operations, marketing and sales operations to our customers.
- **We comply with** all applicable workplace safety laws, regulations, policies, "Environment, Health and Safety" (EHS) standards, wherever we operate.
- **We ensure** we do not put ourselves or others at risk by our actions.
- **We set targets** to drive down incidents across the business.
- **We take responsibility** for maintaining an incident-free workplace.
- **We promptly report** any concerns, accidents or near misses relating to security, environment, health and safety.
- **We strive to protect Ipsen's workplace assets,** including equipment, supplies or other items of value.
- **We promote a healthy lifestyle** and encourage employees to proactively manage their personal health.

FOR MORE INFORMATION

We can refer to Ipsen's Environment, Health and Safety (EHS) Policies and S3 EHS Code Principles.
If we have questions or concerns, we contact the EHS manager (or EHS Champion), our manager, Human Resources, or, for reporting any concerns, we can use the Whispli designated Alert Platform (https://app.whispli.com/IpsenAlerts) or the email address Ipsen.Ethics.Hotline@ipsen.com.



Caroline
Laboratory Technician
France

QUESTION:
I SLIPPED AND FELL IN THE COFFEE AREA AT WORK AND ENDED UP WITH A CUT ON MY FOREHEAD. NOTHING TOO SERIOUS. I THINK THE CUT WILL HEAL ON ITS OWN, AND I DO NOT WANT TO IMPACT MY OFFICE'S SAFETY RECORD. DO I REALLY HAVE TO REPORT THIS?

IPSEN ANSWER:
Yes. Ipsen requires that I report all workplace incidents regardless of whether I was injured or not so that my accident can be treated promptly and properly. Ipsen also promotes reporting of unsafe conditions, even if no incident has occurred. These reports also help identify potentially dangerous conditions that can be corrected before serious injuries occur. This allows Ipsen to improve EHS performance and maintain a safe working environment for everyone.

FOSTER AN ENVIRONMENT OF EQUALITY, DIVERSITY, DIGNITY AND ENGAGEMENT

Ipsen fosters a stimulating, creative and non-discriminatory workplace environment for all our Workforce and partners. Managers have an accountability to foster an environment of equality, diversity, dignity and engagement within their teams.

- **We commit to supporting diversity** at all levels of the organization, as we strongly believe this is an integral part of our culture and generates conditions for performance excellence.
- **We ensure equality of opportunity** and treatment for all employees in recruitment, employment, development and career advancement, providing equal opportunities based on fair, transparent and objective criteria.
- **We prohibit any form of discrimination**, on the basis of race, color, religion, nationality, age, sex, physical or mental disability, physical appearance, medical or personal condition (including pregnancy and parenthood), genetic information, gender identity or expression, sexual orientation, marital status, political persuasion, trade union membership and/or any other characteristics protected by law.
- **We promote open dialogue and listen** to the needs of our employees.
- **We treat all employees and partners ethically, respectfully and with dignity** in a work environment which is free from violence, bullying and/or any form of harassment; This includes physical, psychological, and sexual harassment, whether it is verbal or written. We encourage employees to speak up if they believe an Ipsen employee has either demonstrated or been subjected to bullying or harassing behaviours.

IF WE HAVE QUESTIONS AND/OR CONCERNS WE WANT TO REPORT

We ask our manager or Human Resources.
If we believe that anyone, including ourselves, has been subjected to discrimination, bullying, or harassment we immediately report it to our manager, Human Resources, Business Ethics or we use the Whispli designated Alert Platform (https://app.whispli.com/IpsenAlerts) or the email address Ipsen.Ethics.Hotline@ipsen.com.

QUESTION:
IN A FEW MEETINGS, ONE OF MY COLLEAGUES HAS MADE DISRESPECTFUL REMARKS, IN THE FORM OF A JOKE, ABOUT A FEMALE EMPLOYEE. NOT ONLY DOES HIS ATTITUDE CREATE A TENSE ENVIRONMENT IN THE MEETINGS, BUT I FIND HIS BEHAVIOR INSULTING. AT THE SAME TIME, I DON'T WANT TO BE SEEN AS SOMEONE WHO IS HUMORLESS, SO I DON'T CONFRONT HIM. HOW SHOULD I REACT?

IPSEN ANSWER:
Jokes made about people because of their gender or any other personal characteristics are not acceptable at Ipsen. They deny the respect that each of us deserves. I am encouraged to report this behavior to my manager, Human Resources, Business Ethics or I can use the Whispli designated Alert Platform (https://app.whispli.com/IpsenAlerts) or the email address Ipsen.Ethics.Hotline@ipsen.com.

COMMUNICATE RESPONSIBLY

Ipsen attaches great importance to protecting its image and reputation. These important assets depend directly on the behavior of each of us and how we communicate internally and externally.

We are committed to protecting our image and reputation by implementing responsible communication at all times and in every context:

- **We never speak** on Ipsen's behalf without prior authorization. We think of the consequences our comments might have for the company and where appropriate, clearly state that these are my own personal views and do not in any way represent Ipsen's position on the topic discussed.
- **We do not respond to questions** and politely refer such questions to Global Communications, if we are contacted by the press or other media professionals.
  We inform Global Corporate Communications corporate.communications@ipsen.com and liaise with them on how best address the request.
- **We communicate,** through all channels, in a clear, accurate, timely, appropriately authorized manner, which is consistent with applicable laws, regulations and Ipsen policies. Our communication are professional and respectful. We avoid, excessive jargon, sarcasm, personal criticism, discriminatory remarks and unprofessional humor.
- **We respect** the political opinions and personal commitments of employees, but any expression of such beliefs or commitments must remain in an individual capacity and never on behalf of Ipsen.
- **We respect** privacy, by requesting written consent prior to posting photos or information related to other individuals apart from yourself.
- **We do not disclose** any confidential, business sensitive, or personal information belonging to Ipsen, other Ipsen employees, or third parties (e.g., customers, customers, shareholders).
- **We do not engage** in any public conversations online posting branded (product e.g., Dysport) content or provide medical information or advice.

FOR MORE INFORMATION

We can refer to Ipsen's "Social Media Guidelines for Ipsen Employees".
If we have questions or concerns, we ask our manager or Global Corporate Communications.



Eva and Claire
Eva, Manager, Talent Management and Learning & Development
Claire, people Operations Specialist
USA

QUESTION:
CAN I REPOST A PRESS RELEASE ABOUT AN IPSEN PRODUCT CLINICAL STUDY?

IPSEN ANSWER:
I must not repost Product Related Press Releases. If the release includes information on Products (directly e.g., FDA approval or indirectly e.g., financial results announcement), then it falls under the same category of "Product Material/News" where NO engagement is allowed outside of the US. Reposting may be viewed as inappropriate promotion to the general public.

SPEAK UP

Ipsen strongly encourages a culture where employees can speak up or raise any questions or concerns on any business and employee conduct that is suspected not to comply with our Code of Conduct, our policies and procedures and Ipsen's legal and ethical obligations.

When we speak up, we do the right thing. By raising concerns, we help to protect ourselves, our colleagues and Ipsen's image and reputation:

- **We can speak** with our manager, with Human Resources or Business Ethics. Additionally, if we prefer, we can use the Whispli designated Alert Platform (https://app.whispli.com/IpsenAlerts) or the email address Ipsen.Ethics.Hotline@ipsen.com. The information submitted through the Alert Platform and the email address will only be received by the specific individuals in the Global Business Ethics department entrusted with the management of alerts.
- **We provide** a safe environment for raising concerns:
  - To the extent permitted by applicable laws.
  - The protection of the individual making the alert is of paramount importance. Any information that may assist in identifying the individual making the alert will not be disclosed to any person other than those directly involved in the treatment of the alert.
  - Reports may be made anonymously, if the individual feels uncomfortable disclosing their identity.
  - Ipsen is committed to a strict non-retaliation policy. No retaliatory action will be taken against any individual making an alert in good faith.
  - Ipsen is responsible for the handling of any alert and takes all necessary precautions to ensure the protection of data.
  - Only personal data that is relevant, adequate and considered absolutely essential, will be collected.
  - Alerts must be based on facts and made in good faith. Abusive, malicious or frivolous reports may lead to disciplinary sanctions.
- **We have established** guidance to ensure transparency, consistency, and fairness in handling the disciplinary cases.



Jackie
Associate Director, Patient Services
USA

FOR MORE INFORMATION

We can refer to the Ipsen "Alert Management Policy" (GLB-POL-003) and to the Ipsen "Disciplinary Policy" (GBL-POL-005). If we have questions, we ask our manager or Business Ethics.

QUESTION:
I HAVE SERIOUS CONCERNS THAT ONE OF MY TEAM MEMBERS IS OVERPAYING ONE OF OUR DISTRIBUTORS, BUT I DON'T FEEL COMFORTABLE SHARING MY CONCERNS WITH MY LINE MANAGER OR WITH MY BUSINESS ETHICS OFFICER. WITH WHOM CAN I DISCUSS THIS ISSUE?

IPSEN ANSWER:
I am encouraged to speak up first to my manager, Human Resources or Business Ethics. However, if I don't feel comfortable contacting any of them, I can use the Whispli designated Alert Platform (https://app.whispli.com/IpsenAlerts) or the email address Ipsen.Ethics.Hotline@ipsen.com to report my concern.



2 WE CARE FOR PATIENTS AND SOCIETY



Ludovic
Production Operator
France

Ipsen is continuously working on its pipeline of innovative assets that aim to provide effective solutions for those with the greatest unmet medical needs. To do so, we strive to bring the right medicine to the right patients at the right time. We build trust with our stakeholders, interacting transparently and in accordance with applicable laws and regulations with patients, patient organizations, non-governmental organizations, policy makers, payers, healthcare professionals (HCPs), healthcare organizations (HCOs), government officials, local communities and the general public.

Ipsen also strives to be an exemplary corporate citizen, committed to serving the communities in which it operates. Ipsen does this by respecting individuals, protecting the planet, and by integrating human rights and environmental considerations into all aspects of its business, from the research and development of products, through to supply chain and manufacturing operations to patients.

ENSURE PRODUCT QUALITY AND SAFETY

Ipsen's products are designed and manufactured in a controlled way, compliant with all regulatory requirements with the final aim of improving patients' lives.

We ensure product quality and safety of the entire supply chain as part of our daily commitment:

- **We commit** to demonstrating the safety, integrity, strength, purity and quality of our clinical and commercial products.
- **We comply with** all applicable legal and regulatory requirements.
- **We comply with** internationally acknowledged Good Practice (GxP) regulations, e.g., Good Clinical Practice (GCP), Good Pharmacovigilance Practice (GVP), Good Laboratory Practice (GLP), Good Manufacturing Practice (GMP), Good Distribution Practice (GDP), Good Storage Practice (GSP) and Good Promotional Practice (GPP).
- **We comply with** our Quality Manual, Quality Policy and GxP policies and procedures.
- **We continuously improve** our products and processes.
- **We conduct** research, development, manufacturing, testing, distribution and commercializtion with integrity.
- **We promote an ethical** and responsible use of animals. Although Ipsen does not have internal animal research facilities, Ipsen outsources its animal testing and has put in place an Animal Welfare governance body ensuring the appropriate treatment of animals
- **We take note** of questions and claims relating to our products, so that we can constantly enhance our quality and safety standards.

- **We respond** promptly and transparently to any concerns about product safety and quality issues.
- **We comply with** applicable pharmacovigilance reporting obligations.
- **We report immediately,** within one business day, information reported by patients, healthcare professionals or any type of source regarding:
  - Side effects or adverse events and or special situation (eg. Lack of efficacy, Off label use etc.) of a product to the local Pharmacovigilance manager.
  - Counterfeit or suspected counterfeit drugs, tampering to the Product Complaint Manager.
  - Theft or product diversion to Quality.
  - Product complaints to the Product Complaint Manager.

FOR MORE INFORMATION

For safety information reporting we refer to the Ipsen "Affiliate Vigilance Activities Management" (SOP-080476).
If we have questions or concerns, we contact our manager, the local Pharmacovigilance manager or the Quality department.

QUESTION:
MY NEIGHBOR HAS BEEN SUFFERING FROM NAUSEA AND DIGESTIVE PROBLEMS AFTER TAKING AN IPSEN PRODUCT. DO I HAVE TO REPORT IT EVEN IF THEY TELL ME THEY HAVE ALREADY REPORTED IT TO THEIR DOCTOR?

IPSEN ANSWER:
Yes. You should report the adverse event immediately, within one business day to the Pharmacovigilance manager in your affiliate, according to Ipsen "Affiliate Vigilance Activities Management" (SOP-080476).

ACT WITH INTEGRITY WHEN INTERACTING WITH EXTERNAL STAKEHOLDERS: HEALTHCARE PROFESSIONALS AND ORGANIZATIONS, PATIENT ORGANIZATIONS AND PATIENTS, GOVERNMENT OFFICIALS & HEALTHCARE DECISION MAKERS

Ipsen interacts with external stakeholders in accordance with the following principles:

- **We conduct all interactions with a legitimate intent** aligned with Ipsen's vision to discover, develop and deliver innovative medicines that improve patients' lives.
- **We are patient focused** with the underlying rationale for all interactions must be to ultimately improve patients' lives.
- **We are transparent** in all interactions and conduct ourselves in a trustworthy manner, with business integrity. We disclose information related to transfers of value to HCPs/HCOs, clinical trials, scientific publications, and interest representation activities.
- **We provide information which is accurate,** objective, balanced and appropriate to the context and the stakeholders. We do not partake in any deceptive practices.
- **We respect stakeholders' independence** to perform their official professional duties. We must not interact with external stakeholders when there is an actual, perceived or potential conflict of interest arising from any such interaction which may unduly influence the stakeholder's decision and/or conduct or create the perception of doing so.
- **We do not give or accept gifts** from any external stakeholder, as gifts may be perceived as improper or could improperly influence your or an external stakeholder's decision-making. Payments in cash are prohibited, we do not give or receive cash payments from external stakeholders.

FOR MORE INFORMATION

We can refer to the Ipsen "Global Directive on Interactions with HCPs and HCOs" (GLB-DIR-002) or contact Business Ethics.

INTERACTIONS WITH HEALTHCARE PROFESSIONALS AND ORGANIZATIONS

Ipsen interacts with healthcare professionals (HCPs) and organizations (HCOs) to ensure patients receive the most appropriate treatments at all times and to enable the research and development of new treatments that target patients' unmet needs.

- **We commit** to ensuring there is a legitimate scientific or business need for interactions with HCPs and HCOs, driven by the highest ethical standards in the best interest of patients.
- **We interact** with HCPs and HCOs to foster scientific information about diseases and the effective use of healthcare products, in line with the relevant regulatory standards.
- **We cooperate** with HCPs and HCOs to research and develop healthcare products that meet the needs of patients.
- **We work** with HCPs and HCOs to obtain their insight and advice to better structure and implement our activities in the interest of patients.
- **We never try** to inappropriately influence HCPs and/or HCOs, with misleading information or anything of value, to obtain a favorable treatment for Ipsen or its products.

QUESTION:
MY SALES MANAGER ASKED ME TO ENSURE THAT OUR KEY HCPS ARE ALWAYS TREATED IN THE BEST POSSIBLE WAY. THEY SAID THAT WE CANNOT AFFORD TO LOSE THEM BECAUSE OUR COMPETITORS OFFER MORE "EXCLUSIVE" ACCOMMODATION AT MEETINGS. WHAT SHALL I DO?

IPSEN ANSWER:
At Ipsen, all HCPs and HCOs are "key" to success for patients. We do not single out one HCP or HCO over others as being preferred, except on the basis of ability to perform the services required. I cannot offer more "exclusive" or luxurious accommodation to HCPs as a way to compete or seek their favor. At Ipsen, we compete on the merits of our products. I must follow Ipsen hospitality rules to allow HCPs to participate in scientific or promotional events in a professional manner without even giving the impression of attempting to influence them with inappropriate hospitality.

INTERACTIONS WITH PATIENT ORGANIZATIONS AND PATIENTS

For the ultimate benefit of patients, Ipsen engages and interacts with Patient Organizations and patients throughout the patient journey, including the early clinical development process and product availability.

- **We listen** to patients' needs and insights on impact of disease and treatments in their daily life.
- **We work** with Patient Organizations to increase disease awareness and improve patient care.
- **We act** with transparency, integrity, mutual respect and trust.
- **We commit** to providing Patient Organizations and patients with factual, objective, and evidence-based scientific information, without raising unfounded hopes or being misleading.
- **We ensure** safety and protect the rights of patients participating in clinical trials.
- **We are committed** to doing our utmost to ensure uninterrupted supply of products and services at all times.

FOR MORE INFORMATION

We can refer to "Interactions with Patients, Patient Experts and Patient Organizations" (SOP 369737)



Janaine
Patient Advocacy Senior Manager
Brazil

QUESTION:
IPSEN LAUNCHED A PRESCRIPTION-ONLY PRODUCT LAST YEAR. CAN I CONTACT AN ONCOLOGY PATIENT ORGANIZATION, SO THEY CAN POST PRODUCT INFORMATION ON THEIR WEBSITE? IT IS IMPORTANT THAT PATIENTS HAVE ACCESS TO ALL RELEVANT INFORMATION FOR THEIR HEALTH

IPSEN ANSWER:
In most countries around the world, we must not provide product information to Patient Organizations, patients or the general public to help us promote a prescription-only product. An exception is our US market, where this practice can be permissible, so in any situation involving the US, you must consult local Business Ethics and/or Legal for guidance (In such case, materials and messages directed at patients must only focus on the approved uses of Ipsen's marketed product and the disease states treated by this product. All materials and items used by or distributed to Patients and/or Caregivers must be approved in advance for Patient use through the applicable process).
In most other countries, we do not work with Patient Organizations, patients or the general public for promotional purposes. In the event of an unsolicited request from a Patient Organization on scientific data, Ipsen will provide factual, objective and scientific-based information through the applicable medical information process.

INTERACTIONS WITH GOVERNMENT OFFICIALS

Ipsen engages regularly with policy makers responsible for shaping and implementing laws, regulations, codes and public policies that may impact us and patients. Our company is committed to promoting evidence-based discussions with these stakeholders to shape public policies in a sustainable and professional manner.

- **We operate transparently** and in compliance with the laws, regulations and codes on interactions with policy makers.
- **We expect** the policy makers we interact with to be compliant with the transparency and disclosure rules that apply to them, including those of the institutions they cooperate with.
- **We provide** policy makers with information that is fair, balanced and substantiated to enable them to exercise the best possible judgement in creating and implementing policies in the interest of patients and of the general public.
- **We do not try** to influence policy makers inappropriately through misleading information or anything of value in order to obtain favorable treatment for Ipsen or its products.

FOR MORE INFORMATION

We can contact the Public Affairs department and refer to "Interactions with Government Officials and Healthcare Decision Makers." (GBL-DIR-006).
If we have concerns, we speak to our manager or Business Ethics or we can use the Whispli designated Alert Platform (https://app.whispli.com/IpsenAlerts) or the email address Ipsen.Ethics.Hotline@ipsen.com.



Margo and Jim
Margo, Senior Executive Assistant,
Jim, Regional IT Service Delivery Manager
USA

QUESTION:
I HAVE BEEN ASKED TO CREATE AN AWARENESS CAMPAIGN ON UNMET MEDICAL NEEDS IN ONCOLOGY. I AM HOPING TO CONTRACT A FAMOUS MEMBER OF PARLIAMENT AS SPOKESPERSON TO MAKE THE CAMPAIGN MORE POPULAR. CAN I DO THAT?

IPSEN ANSWER:
I cannot contract or pay honoraria to members of parliament or to other government officials. They can freely choose to collaborate with us on a campaign, as part of their public duty, but I cannot persuade them to support an Ipsen initiative through the prospect of being paid for a service, by promising campaign contributions, or by other means of financial influence.

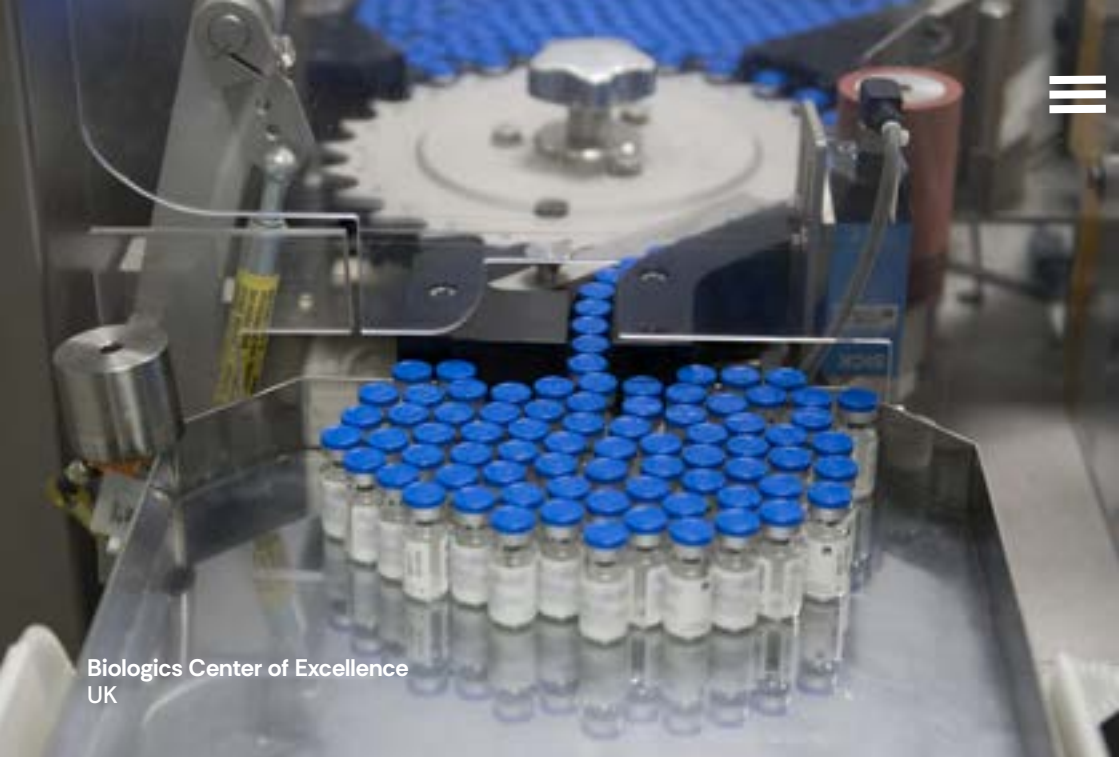
INTERACTIONS WITH HEALTHCARE DECISION MAKERS

Ipsen interacts regularly with payers responsible for pricing, reimbursement and other important administrative decisions on healthcare products, to ensure the best possible access to treatment for all patients.

- **We operate transparently** and in compliance with the laws, regulations and codes on interactions with payers.
- **We conduct** interactions with payers in an open and transparent manner and we avoid any real or perceived conflict of interest.
- **We promote** evidence-based interactions with payers in the best interest of patients and of public finance.
- **We provide** payers with relevant scientific and economic information that is accurate, substantiated, fair and balanced and without manipulation so that they can make the best possible objective decisions.
- **We do not try** to influence payers inappropriately to obtain favorable treatment for Ipsen or its products.

FOR MORE INFORMATION

We can contact the Market Access department and refer to "Interactions with Government Officials and Healthcare Decision Makers". (GLB-DIR-006)
If we have concerns, we speak to our manager or Business Ethics or we can use the Whispli designated Alert Platform (https://app.whispli.com/IpsenAlerts) or the email address Ipsen.Ethics.Hotline@ipsen.com.



Biologics Center of Excellence
UK

QUESTION:
ONE OF MY KEY HCPS HAS BEEN APPOINTED AS A LEADING EXPERT TO THE NEW PRICING COMMITTEE. IT'S LIKELY THAT NEXT YEAR THEY WILL BE DEALING WITH THE PRICING OF OUR NEW PRODUCTS CURRENTLY IN THE PIPELINE. BEFORE THEY MOVE TO THEIR NEW ROLE, I WOULD LIKE TO INVITE THEM TO THREE ADVISORY BOARDS SO THAT THEY BECOME EVEN CLOSER TO IPSEN. CAN I DO THAT?

IPSEN ANSWER:
No. At Ipsen, all HCPs and HCOs are "key" to success for patients. We do not single out one HCP or HCO over others as being preferred, except on the basis of the ability to perform the services required. I cannot use advisory boards to strengthen the loyalty of a future payer so that they will have a more positive attitude towards Ipsen when taking important access decisions. These decisions must be made only in the best interest of patients and of public finances.

PROMOTE OUR PRODUCTS RESPONSIBLY

Ipsen promotes its products responsibly, in compliance with the highest legal and regulatory standards.

- **We promote** our prescription-only medicines only for uses that have been approved by the relevant authorities.
- **We promote** our prescription-only medicines to HCPs. We also promote to the general public, but only in countries where direct-to-consumers advertising is allowed, and in compliance with the applicable laws, regulations and industry codes.
- **We communicate** product information which is fair, balanced, objective, complete, accurate, substantiated and up-to-date.
- **We approve** promotional materials prior to their use following the applicable Company processes.
- **We train** all employees involved in the promotion of our products, on approved uses, product-related data, applicable requirements and on the company's promotional rules.

FOR MORE INFORMATION

We can refer to the Country SOPs on Promotional Materials and Global Directive "Digital Activities" (GBL-DIR-004).
If we have questions or concerns, we speak to your manager, Regulatory Affairs or Business Ethics. For reporting any concerns, we can use the Whispli designated Alert Platform (https://app.whispli.com/IpsenAlerts) or the email address Ipsen.Ethics.Hotline@ipsen.com.

QUESTION:
AS A SALES REPRESENTATIVE, I AM KEEN TO START PROMOTING OUR NEW INDICATION TO THE HCPS IN MY REGION. DO I NEED TO WAIT FOR THE APPROVED PROMOTIONAL MATERIALS OR CAN I START SHARING THE REPRINTS OF JOURNAL ARTICLES AND OTHER INFORMATION I FOUND ON THE INTERNET WITH THEM, FOR EXAMPLE THE RECENT IPSEN PRESS RELEASE FOR THE APPROVAL OF THE INDICATION?

IPSEN ANSWER:
No. I can only provide HCPs with materials and content that have been duly approved by Ipsen for that intended use, according to the applicable Promotional Materials SOPs and in accordance with the country regulations on when promotion of new products or indications can begin.



Gaelle
Production Operator
France

RESPECT HUMAN RIGHTS

Ipsen respects human rights and carries out its human rights duties through exemplary behavior in its business conduct. We adhere to the Human Rights principles set out in the United Nations (UN) Global Compact and the International Labor Organization's standards.

We uphold human rights by:

- **Prohibition of Child Labour:** We do not employ individuals under the age of 15 (or the legal age for completing compulsory education) or under 18 for hazardous or night work.
- **Voluntary Employment:** We strictly prohibit forced, bonded, or indentured labor, involuntary prison labor, and human trafficking. All employment is entered into freely and voluntarily.
- **Freedom of Expression and Association:** We respect and support employees' rights to voice concerns about working conditions and to form or join trade unions of their choice, in accordance with applicable laws and regulations

FOR MORE INFORMATION

We can refer to Ipsen's Annual Report, available on Ipsen's website, and to Ipsen | UN Global Compact to which Ipsen is a signatory.
If we have questions or concerns, we speak to our manager or Business Ethics or for reporting any concerns, we can use the Whispli designated Alert Platform (https://app.whispli.com/IpsenAlerts) or the email address Ipsen.Ethics.Hotline@ipsen.com.

QUESTION:
A BUSINESS DEVELOPMENT COMPANY HAS APPROACHED ME TO DISCUSS THE USE OF PRODUCTION FACILITIES IN A DEVELOPING COUNTRY FOR A VERY CONVENIENT PRICE. WHILE ASKING MORE DETAILED QUESTIONS, I REALIZED THAT THE CONVENIENT PRICE IS LARGELY GENERATED BY VERY POOR WORKING CONDITIONS FOR LOCAL EMPLOYEES, INCLUDING CHILD LABOR.

IPSEN ANSWER:
I reject the proposal and I immediately inform Business Ethics and Legal. Ipsen must always respect the human rights of all its employees and of the stakeholders with which it interacts.



Gaelle
Production Technician
France

PROTECT THE ENVIRONMENT AND ACT FOR CLIMATE ACCROSS OUR VALUE CHAIN

At Ipsen , we recognize that protecting the environment and addressing climate change are essential to building sustainable healthcare systems for future generations.

Through our Climate Action commitments, we work to reduce our environmental footprint across the entire value chain, from sourcing raw materials and manufacturing medicines to packaging, distribution, and end-of-life management. Science Base Targets initiative (SBTi) validation confirms Ipsen's 1.5°C-aligned decarbonization pathway direct emissions from owned or controlled sources, indirect emissions from purchased energy & all other indirect emissions across the value chain, strengthening the credibility of our climate strategy and supporting sustainable long-term value creation. Through this integrated approach, Ipsen aims to reduce its environmental footprint, strengthen the sustainability of our operations and contribute to resilient, responsible long-term value creation. We encourage all employees to identify opportunities to improve environmental performance and contribute to our culture of continuous improvement. Our sustainability commitments extend beyond environmental stewardship. Through our Access to Healthcare and Human Impact priorities, we work to expand access to medicines, support inclusive research, foster an inclusive and engaging workplace, and contribute positively to the communities where we operate. Through Responsible Business, we uphold high standards of ethics, compliance, transparency, and accountability across our value chain.

- **We comply with** all applicable environmental laws, regulations and Ipsen Environment, Health & Safety (EHS) policies, standards and requirements.
- **We seek** to prevent pollution and reduce environmental impacts through responsible operations and continuous improvement.
- **We promote** the efficient use of natural resources, including energy, water and raw materials.
- **We work** to reduce greenhouse gas emissions and contribute to Ipsen's climate commitments.
- **We integrate** environmental considerations into decision-making, including procurement, operations, and product development.
- **We partner with** suppliers and business partners who share our commitment to sustainability and responsible business practices.
- **We strive to design** and manufacture medicines that minimize environment. impact throughout their lifecycle.
- **We support** biodiversity and natural ecosystems where we operate.



FOR MORE INFORMATION

We can refer to the Ipsen Environment, Health and Safety (EHS) Policies. If we have questions or concerns, contact our manager or the EHS team or sustainability team.

QUESTION :
I AM PURCHASING MATERIALS FOR OUR NEW OFFICE LOCATIONS. I MUST BE CAREFUL WITH THE BUDGET I USE FOR THIS PURCHASE. SHALL I AUTOMATICALLY SELECT THE CHEAPEST PRODUCTS ON THE MARKET?

IPSEN ANSWER:
No. While cost is an important consideration, purchasing decisions should also take into account quality, safety, environmental impact, supplier practices, and lifecycle considerations. In line with Ipsen's procurement and sustainability commitments, employees should seek solutions that balance business needs with responsible environmental and social outcomes.



Clare
Pharmaceutical Process Technician
U.K.

3 WE ARE COMMITTED TO ETHICS AND BUSINESS INTEGRITY



For the ultimate benefit of patients, Ipsen strives to be a trustworthy partner. Integrity is key to maintaining and enhancing the trust of all stakeholders. Ipsen does not tolerate any practices that might create confusion regarding the integrity of the company or an employee, such as corruption, conflicts of interest, unfair practices, or the use of confidential information for personal gain.

KEEPING IPSEN SECURE

Strong and effective security is critical at Ipsen; it protects our organization, reinforces our credibility and reputation, and enables us to deliver for the patients we serve.

Ipsen faces increasingly sophisticated and complex security threats. The impact of a significant security incident, which could compromise the safety of our people, affect the integrity of our products or patient information, deny us access to critical systems or expose our most sensitive information, could directly harm our ability to deliver our mission – as such, safety and security is a priority for Ipsen at all times.

- **We understand** that we have an important responsibility to safeguard Ipsen against the security threats we face.
- **We learn** how to keep ourselves, our colleagues and our organization secure by completing our security training assignments and paying close attention to security communications and alerts.
- **We comply with** Ipsen's security policies at all times.
- **We keep** Ipsen's premises safe and secure by following site security protocols.
- **We protect** Ipsen information and equipment whilst working from home and when travelling or working within public environments. We immediately report any loss/theft of information and/or devices.
- **We maintain** the security of Ipsen's systems by adhering to information security processes: We select appropriate, unique passwords and never share them. We only interact with links and attachments from trusted sources, and we do not download unapproved software or applications.
- **We safeguard** Ipsen information by classifying it appropriately, only using approved applications to conduct Ipsen business and never transmitting or storing Ipsen information to/from personal accounts. We never disclose confidential information without appropriate authorization.
- **We are** vigilant to potential security threats and promptly report them to our IT and security teams.



FOR MORE INFORMATION

Global Security are here to support you to make the right choices when it comes to security. For support and advice, contact the team at Global.Security@Ipsen.com

QUESTION:
IT'S A BUSY TIME OF THE YEAR AND I MUST FINISH MY REPORT THIS WEEK. CAN I FORWARD ALL THE FILES TO MY PERSONAL EMAIL, AS I THINK I MAY HAVE A SOFTWARE PROGRAM ON MY PERSONAL LAPTOP THAT MAY HELP ME DRAFT MY REPORT FASTER?

IPSEN ANSWER:
No. I cannot transmit or store Ipsen information to a personal account. I must only use approved applications to conduct Ipsen business. As I must not download unapproved applications to Ipsen computers, I can seek assistance from Ipsen's IT support team if I require specific software. By following these security protocols, I help Ipsen continue to operate effectively and securely

PROTECT INTELLECTUAL PROPERTY (IP) ASSETS

Ipsen's intellectual property assets are irreplaceable, and the use of these valuable assets must be protected.

Intellectual property covers notably copyrights, patents, trademarks, and trade secrets, including materials, data, plans, and ideas created in research and development, product and package designs, brand names and logos, business processes, and employee and client.

To provide patients with safe and innovation-driven products, we prevent key ideas and materials from being stolen or misused. We protect our investments in intangible assets by obtaining, enforcing and defending our IP rights. These rights lawfully restrict or prevent others from using Ipsen intellectual property without permission.

- **We respect** the IP rights of others.
- **We do not copy** or misappropriate the IP of others.
- **We make sure** we have the right license or approval of the owner or holder of the relevant IP before installing or using a new piece of software.
- **We rely** upon expert advice from the IP department and refrain from making any written comments or assumptions about IP matters.
- **We safeguard IP** by classifying it appropriate and restricting access only to those who are authorized.

FOR MORE INFORMATION

We ask our manager or Legal.
We report to the IP department any suspected theft, misuse or unintentional leakage of Ipsen intellectual property assets.
Any questions we may have regarding the IP rights of others should be promptly discussed in person with the IP department.

QUESTION:
I AM VERY EXCITED ABOUT THE RECENT RESULTS OF MY RESEARCH & DEVELOPMENT PROJECT. I THINK THEY PROVIDE AN EXCELLENT OPPORTUNITY TO HIGHLIGHT IPSEN'S WORK IN THIS AREA AT AN UPCOMING CONGRESS. THE DEADLINE FOR ABSTRACT SUBMISSION IS TOMORROW. YESTERDAY, MY MANAGER TOLD ME THAT THESE RESULTS WOULD MAKE AN EXCELLENT PUBLICATION. IS IT OK FOR ME TO SUBMIT AN ABSTRACT TODAY TO MEET THE DEADLINE?

IPSEN ANSWER:
No. Any and all public disclosure of Ipsen's confidential information must first receive prior Ipsen internal cross-functional review and approval according to Ipsen's public disclosure procedures



PREVENT INSIDER TRADING

Ipsen prohibits trading in shares based on non-public information or providing non-public information to others so that they may trade. This use of inside information is illegal and may result in criminal prosecution. Such inside information may include clinical trial data, corporate strategies, mergers and acquisitions, strategic contracts, court cases or changes in our top management.

- **We do not use** inside information that we may have heard about during the course of our work to trade on Ipsen's or other companies' shares or securities.
- **We must not** "tip off" any other person to trade based on non-public information.
- **We comply** with applicable laws, regulations and Ipsen's policies on insider trading and the sale and purchase of shares (applicable to Ipsen employees and corporate officers, and their close relatives).
- **We do not** trade in Ipsen shares during blackout periods, including for some time after the inside information has been officially disclosed.

FOR MORE INFORMATION

For more information on insider trading, we can refer to the "Insider e-learning" in ilearn, Ipsen "Insider Trading Policy" or contact the Company Secretary.
If we have concerns, we speak to our manager or Business Ethics or we can use the Whispli designated Alert Platform (https://app.whispli.com/IpsenAlerts) or the email address Ipsen.Ethics.Hotline@ipsen.com.

QUESTION:
IN AN EMAIL MARKED AS CONFIDENTIAL, I HAVE LEARNED THAT IPSEN IS WORKING ON THE ACQUISITION OF A PUBLICLY-TRADED COMPANY. CAN I SUGGEST TO MY SISTER THAT SHE ACQUIRES SHARES OF THIS COMPANY IN ANTICIPATION OF THE ACQUISITION?

IPSEN ANSWER:
No. Trading on non-public information (confidential or inside information) is strictly prohibited, whether trading in the shares of Ipsen or the shares of another company and even if we ask a third-party to do it.



AVOID CONFLICTS OF INTEREST

Ipsen expects its employees to take decisions based on what is best for the company and the well-being of patients and not for personal benefit. Ipsen employees may find themselves in a situation where their personal, social, financial or political interests, or that of private individuals or corporations with whom they are linked or close to, may come into conflict with the interests of Ipsen. A conflict of interest, whether potential or actual, can seriously damage Ipsen's reputation and have consequences for the individuals involved.

- **We make** decisions based on what is best for the company and the well-being of patients.
- **We do not** unduly use our professional role for our personal benefit or to benefit relatives.
- **We take** every reasonable step to avoid finding ourselves in situations of conflicting interests with our company.
- **We disclose** all conflicts of actual or potential interest in writing according to the existing procedures.
- **We do not** accept any gifts.
- **We do not accept** any invitations to a meal or social, cultural, sporting or hospitality event that may compromise our independence or judgment regarding a third party or that otherwise may be considered as, or reasonably appear to be, inappropriate.

To prevent conflicts of interest, we safeguard against situations in which the objectivity of a business decision may be impaired, or may reasonably appear to be impaired, especially when:

Investing in a competitor, supplier or customer. Having a family member who wants to do business with Ipsen. Taking a second job or accepting board membership in another company.



Lee
Logistic Operator
U.K.

FOR MORE INFORMATION,

We can refer to the Ipsen "Global Conflict of Interest SOP" (GLB-SOP-002).
In case of an actual or potential conflict of interest, we immediately inform our manager to find an appropriate solution and record the details in the iDeclare Platform.
If we have questions, we speak to our manager or Business Ethics or, for reporting any concerns, we can use the Whispli designated Alert Platform (https://app.whispli.com/IpsenAlerts) or the email address Ipsen.Ethics.Hotline@ipsen.com.

QUESTION:
I HAVE TO SELECT A SUPPLIER FOR A SPECIFIC PROJECT.
ONE OF THE SUPPLIERS BEING CONSIDERED IS A COMPANY OWNED BY MY BROTHER'S WIFE. DO I NEED TO TAKE ANY PRECAUTIONS?

IPSEN ANSWER:
As there might be conflicting interests, I must inform my manager, disclose this conflict of interest and recuse myself from the supplier selection decision. My manager can make a more objective decision on whether the supplier represented by my sister-in-law is in the best interests of Ipsen.

SUSTAIN FAIR COMPETITION AND COMPLY WITH TRADE LAWS

Ipsen supports open and fair competition and strongly believes that fair pricing of drugs is essential to enable access to care. To foster fair pricing and equitable commercial conditions, antitrust laws across the world promote fair competition and protect customers from unfair business practices. Violation of antitrust and competition laws could result in severe penalties for both Ipsen and its employees.

In addition, Ipsen complies with all applicable laws, regulations, sanctions and restrictions that relate to the import and export of its products and services. Ipsen also complies with anti-boycott laws that apply to the countries in which it does business.

At Ipsen, we compete only on the merits of our products and in compliance with applicable antitrust and competition laws. Competition and antitrust risks may arise from arrangements, oral or written, between Ipsen and its competitors, or Ipsen and its suppliers or customers.

We never enter into arrangements or exchange information with competitors about:

- **Pricing and costs**
- **Terms or condition of sales**
- **Discounts**
- **Marketing strategies**
- **Market share allocation**
- **Customer lists**
- **Any other commercially sensitive or confidential information**

As Ipsen representatives and employees, we are especially cautious when attending industry association meetings or any other interactions with competitors. If any kind of anti-competitive discussion arises we refuse to take part in the discussion, leave the meeting immediately, ask for our refusal to participate in such discussion to be inserted in the meeting minutes, and report it to our manager and Legal.

FOR MORE INFORMATION

If we have questions or concerns, we speak to our manager or Legal or, for reporting any concerns, we can use the Whispli designated Alert Platform (https://app.whispli.com/IpsenAlerts) or the email address Ipsen.Ethics.Hotline@ipsen.com.

QUESTION:
DURING A COFFEE BREAK AT A TRADE ASSOCIATION MEETING, I RAN INTO A MARKET ACCESS REPRESENTATIVE FROM A COMPETITOR WHO ASKED ME TO TALK "OFF-LINE" ABOUT THE DETAILS OF THE RECENT PRICING AND REIMBURSEMENT NEGOTIATIONS FOR OUR NEW PRODUCT. WHAT SHOULD I DO?

IPSEN ANSWER:
I politely decline to answer and reply that pricing-related matters must not be discussed between competitors. I promptly inform my manager and Legal after receiving the request.

FIGHT CORRUPTION

Ipsen strongly rejects all forms of corruption as these distort fair trade, hinder economic development and impose multiple costs on society at large.

Ipsen prohibits employees and contractors from accepting, offering or giving, directly or indirectly through third-parties, anything of value to any person or organization, whether public officials or not, to obtain or retain any undue advantage.

Ipsen complies with all applicable international and national laws, regulations and codes that prohibit any form of corruption. Non-compliance with applicable anti-corruption laws can have severe consequences for Ipsen and the employees concerned. Ipsen avoids doing business with entities and/or individuals that are subject to official trade and economic sanctions.

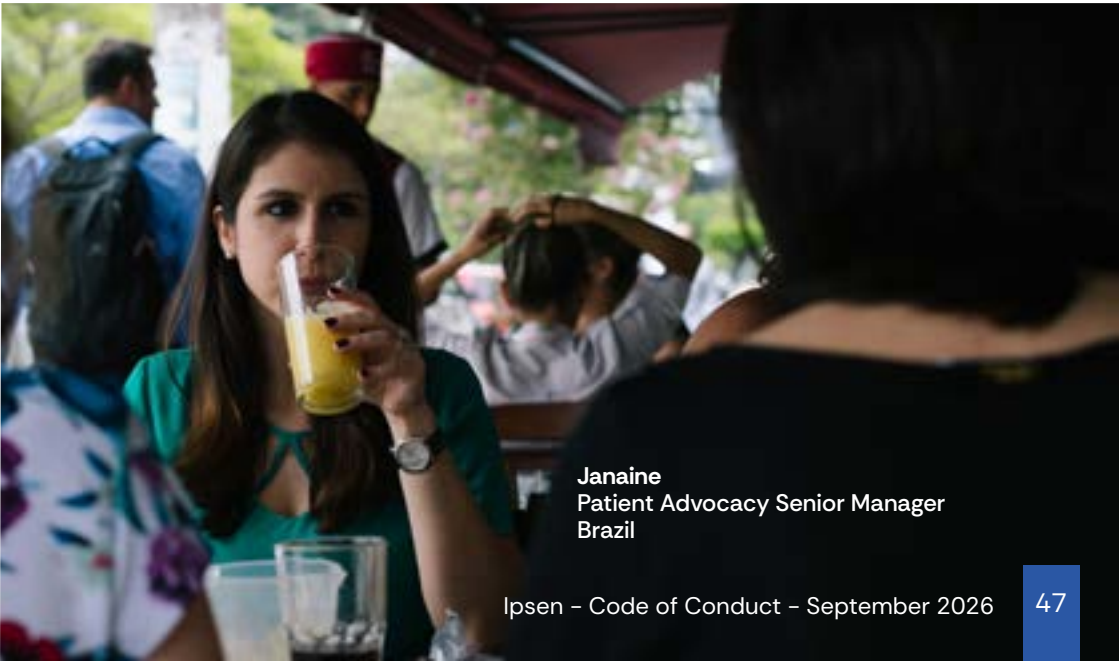
- **We interact** with all our stakeholders with the highest level of integrity based on the merits and the science behind our assets.
- **We do not** offer or give any stakeholder anything of value to obtain or retain any undue advantage.
- **We do not** offer HCPs and/or other stakeholders any gifts, congress sponsorships, grants, donations, hospitality, or anything of value in return for an increase in prescriptions or to obtain other undue advantage for Ipsen.
- **We maintain** accurate books and records to reflect all financial transactions made and received.

FOR MORE INFORMATION

We refer to the Ipsen "Global Anti-Corruption Policy" (GLB-POL-004). If we have questions or concerns, we speak to our manager or Business Ethics or, for reporting any concerns, we can use the Whispli designated Alert Platform (https://app.whispli.com/IpsenAlerts) or the email address Ipsen.Ethics.Hotline@ipsen.com.

QUESTION:
AS AN IPSEN SALES REPRESENTATIVE, I HAVE BEEN ASKED BY AN HCP WHO IS A SIGNIFICANT PRESCRIBER OF OUR PRODUCTS IN MY TERRITORY TO INVITE THEM AND ALL OF THEIR TEAM TO AN INTERNATIONAL CONGRESS IN MILAN. THEY ADDED THAT THIS INVITATION IS ESSENTIAL TO KEEP OUR PRODUCTS IN THE HOSPITAL FORMULARY FOR NEXT YEAR. WHAT SHALL I DO?

IPSEN ANSWER:
I reject the proposal and immediately inform Business Ethics and Legal. Ipsen must not provide anything of value, such as congress sponsorships, to retain a business advantage. Sponsorships to congresses are only provided for educational purposes.



Janaine
Patient Advocacy Senior Manager
Brazil

SELECT BUSINESS PARTNERS CAREFULLY

Ipsen is committed to selecting the most appropriate business partners and maintaining fair relationships with them. Ipsen informs all of its business partners of its ethical principles and expectations and expects them to comply with the principles set out in Ipsen's "Business Partner Code of Conduct".

Ipsen may be held accountable for the behaviors of third parties it interacts with. It's very important that we only interact with trusted and reputable business partners that have successfully been through our due diligence process.

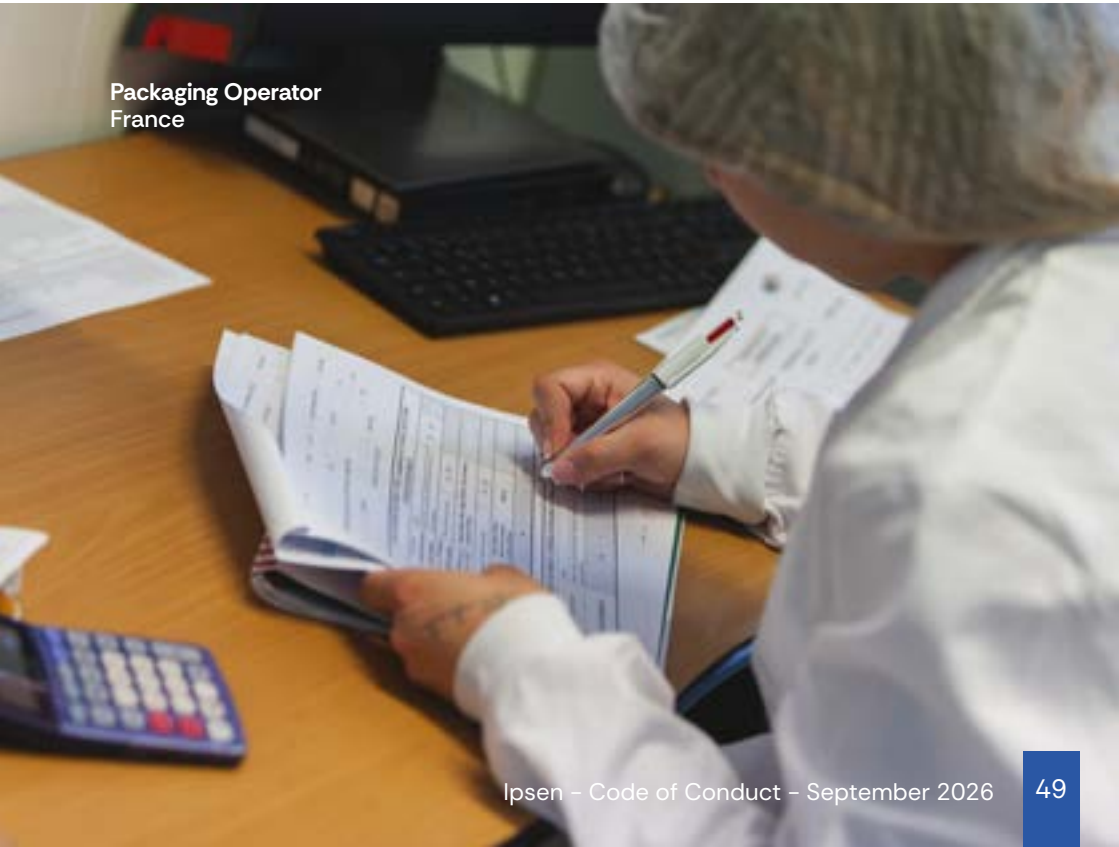
- **We select** our business partners based on objective criteria, including sustainability, without regard for any personal interest.
- **We do not** enter into any business or contractual relationship with business partners subject to trade and/or economic sanction;
- **We perform** due diligence on our prospective business partners to ensure they have the ability and credibility to enter into a business relationship with Ipsen and to perform the services for which they would be contracted.
- **We are particularly** cautious with payments from or to or involving suspicious sources.
- **We watch out** for any unusual behavior or red flags regarding any of our business partners that may indicate improper behavior.
- **We always treat** our business partners with respect and professionalism.

FOR MORE INFORMATION

We refer to the Ipsen "Global Anti-Corruption Policy" (GLB-POL-004), the Ipsen "Global Third Party Business Ethics Management" SOP (GBL-SOP-003) or the Ipsen "Ipsen Procurement Policy".
If we have questions or concerns, we speak to our manager or Business Ethics or, for reporting any concerns, we can use the Whispli designated Alert Platform (https://app.whispli.com/IpsenAlerts) or the email address Ipsen.Ethics.Hotline@ipsen.com.

QUESTION:
ONE OF OUR KEY STRATEGIC DISTRIBUTORS HAS BEEN IN THE LOCAL NEWS RECENTLY FOR A SCANDAL RELATED TO EXCESSIVE HOSPITALITY WITH NURSES. I CANNOT AFFORD TO LOSE THIS DISTRIBUTOR. WHAT SHALL I DO?

IPSEN ANSWER:
I immediately inform Business Ethics for assessing and treating the case. Ipsen may be held accountable for the behaviors of the third parties it interacts with and therefore it is very important that we only interact with trusted and reputable partners.



Packaging Operator
France

RESPECT PRIVACY AND PROTECT PERSONAL DATA

Ipsen fully supports data protection and safeguards individuals' right to privacy in compliance with all applicable laws, regulations and codes.

All employees and third parties we interact with (e.g. patients, healthcare professionals, representatives of the scientific community, suppliers etc.) are entitled to their privacy. We are committed to respecting and protecting privacy and personal data by applying the following principles:

- **We use personal data fairly** – We collect, store and use personal data fairly, lawfully and for specific, clear and legitimate purposes.
- **We minimize the data we use** – We only collect what we need, and only retain personal data for as long as necessary.
- **We are transparent** – We inform individuals about who we are, how we use their personal data, who we share it with and where it may be transferred.
- **We keep data secure** – We protect personal information against unauthorized use, inadvertent disclosure, damage, loss and theft.
- **We respect individual rights** – We ensure individuals can exercise their rights with respect to their personal data(access, correction, deletion, etc.)
- **We comply with the law** – We comply with all applicable data protection laws, regulations and codes.

FOR MORE INFORMATION

You can refer to the Ipsen "Global Policy on Data Protection" (361890-PLY).
If you have questions, we can contact Ipsen's Global Data Privacy Officer at dataprivacy@ipsen.com.

QUESTION:
A SUPPLIER'S REPRESENTATIVE ASKED ME FOR THE PERSONAL PHONE NUMBER OF ANOTHER IPSEN EMPLOYEE. THE REPRESENTATIVE TELLS ME THEY ALREADY INTERACTED TOGETHER SOCIALLY. CAN I SHARE THIS INFORMATION WITH THEM?

IPSEN ANSWER:
No, all employee personal data must remain strictly confidential. I may, however, reach out to this colleague, talk about the supplier's request and let them freely decide whether to share or not the requested phone number.



Torianio, Director of Learning & Development, and Kyle, Senior Manager, FP&A
U.S.A.

RESPONSIBLE ARTIFICIAL INTELLIGENCE USE

At Ipsen, we recognize Artificial Intelligence (AI) offers significant opportunities to enhance innovation, efficiency, and decision-making. We are committed to using AI responsibly by addressing potential risks related to accuracy, human oversight, transparency, privacy, workforce impact, and environmental sustainability.

With a clear understanding of AI's benefits and risk, we drive the implementation and use of AI to ensure:

- **Human oversight and control** AI supports and enhances human abilities, rather than replacing them. We keep humans firmly at the center of all decisions: critical thinking leads main outcomes, with AI providing informed and responsible support.
- **Responsible AI grounded in our values and protected by guardrails.** We design, deploy and use AI solutions that are fair, transparent, secure, and fully compliant with regulations.
- **Mindful Impact on the Workforce, Society and Environment.** We empower our people to make the most of AI while carefully considering its impact on society and the environment. We are also committed to developing the right skills, supporting responsible adoption, and ensuring that AI's benefits are shared broadly.

To maximize benefits, monitor risks and impacts, and safeguard trust and compliance, **we maintain strong governance and collaboration** across all functions involved in our AI and Digital ecosystem.

FOR MORE INFORMATION

For more information refer to the "Global AI Governance" (481698-PLY).



Torianio
Director of Learning & Development
U.S.A.



4 CODE OF CONDUCT: YOUR COMMITMENT



WHISTLEBLOWING, WHO TO CONTACT AND HOW TO RAISE CONCERNS

You are encouraged to always speak up and raise any questions with your manager. If the matter involves your line manager, you should report directly to **Business Ethics** or **Human Resources** for your country, function or site.

If you are not comfortable with reporting the matter to your manager, **Business Ethics** or **Human Resources,** you can raise your alert through the Whispli designated Alert Platform (https://app.whispli.com/IpsenAlerts) or use the email address Ipsen.Ethics.Hotline@ipsen.com.

PLEDGE TO THE CODE

I certify that I have received, read, understood and agree with Ipsen's Code of Conduct, including the policies and procedures mentioned in it. I commit to use it as a compass for acceptable behavior and I fully acknowledge that making the right choices contributes to Ipsen's ethics and compliance, sustainability, culture and enhances Ipsen reputation.

I acknowledge I have a responsibility to report any known or potential violations of the Code, Ipsen's policies or procedures, or the law, through the available channels, except where laws or regulations specify otherwise. I understand that any concerns I raise in good faith, or on the basis of a reasonable belief, of attempted, actual or suspected bribery or violation of the anti-bribery policy, I will not suffer retaliation, discrimination or disciplinary action. I understand that I have the right to refuse to participate in any activity that may be reasonably judged to be a more than low risk of bribery and that has not been mitigated by Ipsen.

I understand that any failure to comply with this Code, Ipsen's policies and procedures, or applicable laws and regulations may expose me to disciplinary action up to and including termination of employment, in accordance with country labor laws.

NAME:

SIGNATURE:

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