

COMMUNICATION ON PROGRESS

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01

Statement from the CEO

STATEMENT FROM THE CEO

“ HRA Pharma is a company of values.

HRA Pharma promotes and develops its values for the benefit of patients, consumers and employees and in constant concern for compliance with applicable laws and fundamental principles of ethics, human rights and sustainable development.

For several years, HRA Pharma has been committed to the principles of the United Nations Global Compact, which it strives to share with its partners.

The growth of our company, the diversification of its portfolio and the increasing number of employees and partners worldwide, do not detract from the mission of HRA. The objectives and values we have set have encouraged us to develop new compliance tools and to surpass ourselves time and time again.

Thank you to all of those who are involved in the development of this culture.

Sincerely yours,

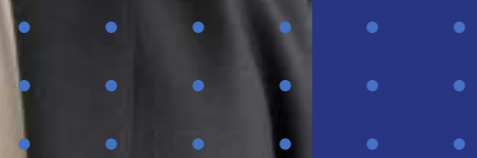
”

David Wright
CEO of HRA Pharma



02

United Nations Global Compact



02

UNITED NATIONS GLOBAL COMPACT

Corporate sustainability starts with a company's value system and a principles-based approach to doing business. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption.

The Ten Principles of the United Nations Global Compact are derived from: the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

In October 2012, HRA Pharma formally joined the United Nations Global Compact and has since then systematically asked its trading partners to comply with it.

The principles of the Global Compact are rooted in HRA Pharma's day-to-day culture.

The Ten Principles of the United Nations Global Compact:

Businesses should...

HUMAN RIGHTS

- 01 Support and respect the protection of internationally proclaimed human rights.
- 02 Make sure that they are not complicit in human rights abuses.

LABOUR

- 03 Uphold the freedom of association and the effective recognition of the right to collective bargaining.
- 04 Advocate the elimination of all forms of forced and compulsory labour.
- 05 Defend the effective abolition of child labour.
- 06 Support the elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

- 07 Support a precautionary approach to environmental challenges.
- 08 Undertake initiatives to promote greater environmental responsibility.
- 09 Encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

- 10 Work against corruption in all its forms, including extortion and bribery.

03

HRA Pharma at a Glance

OUR PRODUCTS MATTER

PIONEERS IN WOMEN'S HEALTHCARE

Since its inception, HRA Pharma has empowered generations of women across the world through its emergency contraceptive solutions, often despite opposition and controversy.

The company has gradually grown its portfolio with new innovations in reproductive and women's health by developing and improving access to the next generation of emergency contraception with ellaOne.

HRA Pharma has also created and consolidated research partnerships with public and private institutions around the world to highlight the lack of information available and demonstrate the need for change.

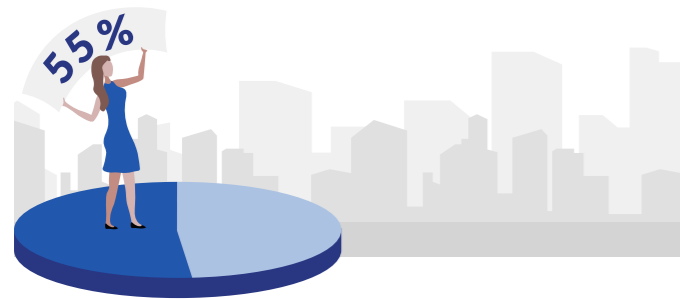
HRA are constantly expanding into new markets with ambitious development programs to switch drugs from prescription to over-the-counter. By bringing more control to more women worldwide, HRA Pharma continues to empower people throughout the world to improve their lives by developing accessible, value added self-care solutions.



03

HRA PHARMA AT A GLANCE

HRA Pharma is a fast-growing, innovative global pharmaceutical company focused on developing leading CHC brands. Having launched the first levonorgestrel-based emergency contraceptive in 1999 and pioneered the creation of the OTC emergency contraceptive market, HRA developed and successfully Rx-to-OTC switched a next generation product, ellaOne, in Europe. HRA is the European leader in emergency contraception with ellaOne, a brand distributed in more than 25 European countries with a market share close to 55% in value.



HRA Pharma operates worldwide through its European subsidiaries and a strong network of distributors. Now number one in emergency contraception, scar, and blister care in Europe, the company is growing rapidly. By introducing new products into new markets, HRA has extended its products' availability to over 90 countries across Europe, South Africa, North America, Asia and the Middle East.

HRA aims to more than double in size by 2022 and become the world's fastest growing consumer healthcare company.

HRA PHARMA RARE DISEASES

Since taking off in 2003 with the rights to sell Lysodren®, HRA Pharma Rare Diseases became a separate legal entity in July 2019. This specialised affiliate business is dedicated to improving the lives of patients with rare and ultra-rare conditions such as Adrenocortical Carcinoma (ACC) and Cushing's Syndrome (CS).

To date, Lysodren® is the only FDA & EMEA approved treatment for the aggressive late-stage of ACC and is considered a cornerstone of care for this particular cancer. To enable the safe and correct administration of this treatment, HRA developed Lysosafe®. This free service enables healthcare professionals to measure patients' mitotane plasma levels and is a crucial tool for patients' monitoring and safety.

After the treatment's successful introduction, HRA Pharma continued its dedication to rare endocrine patients with the launch of Metopirone® and Ketoconazole HRA™ in 2011 and 2014 respectively. Both are used to treat endogenous CS, a debilitating and potentially life-threatening rare disease, associated with significant morbidities and increased risk of mortality. Registrations of both products came about by the direct request from endocrinologists to HRA Pharma to make these vital products available to their patients.

With these two hugely important medicines, HRA Pharma has become the market leader in the treatment of CS and today continues its commitment to supporting Cushing's patients all over the world by providing educational activities to HCPs and patient organisations. In addition, HRA Pharma Rare Diseases continues to cooperate with academic institutions to further invest and support different research and development projects.

HRA Pharma Rare Diseases is dedicated to serving the forgotten rare disease community by making sure that patients across the world have improved and continued access to the life-saving treatments that they need.



GROWING PRESENCE IN CONSUMER HEALTHCARE AND OTC MARKET

ENGAGEMENT WITH CUSTOMERS



HRA Pharma entered the consumer healthcare sector in 2017 with the acquisition of the Compeed® brand from Cilag GmbH International, Johnson & Johnson Group. Internationally known for foot care and cold sore care products, the acquisition of Compeed® was the first step in the repositioning of HRA as a leading CHC company.

Compeed® provides consumers with a comprehensive portfolio of products for the relief and treatment of blisters, corns, calluses and cold sores. In foot care, Compeed® is the #1 brand in blister treatment, with more than 50% market share in Europe, while in lip care, Compeed® is #2 in cold sore treatments in Europe. The acquisition of Compeed®'s global rights further supports HRA's ambition to grow beyond Europe and into top CHC markets such as the US and China, where Compeed® was recently introduced.

The Compeed® project has evolved the nature of our workforce through hiring those with specialist OTC experience. We are leveraging these skills to develop our growth in the OTC market, particularly through the research and the acquisition of new products.

Last year brought the acquisition of Mederma, the US market leader in scar care, named #1 Pharmacist Recommended brand by Pharmacy Times and U.S. News & World Report for the past 17 years. This represents another step in building our portfolio of leading brands while providing scale to our US infrastructure. Mederma has excellent consumer awareness and strong distribution in retail outlets and online sales. The brand is also currently available in South East Asia, India, Mexico and Italy, with HRA planning to increase this coverage to new markets in the future.

A truly global company, HRA is headquartered in Paris, and has a direct presence across 11 European countries (France, UK, Ireland, Italy, Spain, Portugal, Germany, Switzerland, Belgium, Netherlands and Luxembourg). This is in addition to the US, where we opened and staffed a subsidiary in Morristown to support the relaunch of Compeed®, the integration of Mederma as well as our pipeline of Rx-to-OTC switch projects. In the rest of the world, HRA distributes its products using a broad network of local partners, now operating in Europe, South Africa, North America, Asia and the Middle East.



NB: Acquisition of Mederma effective as of 27th June 2019

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Our Principles in Everyday Culture

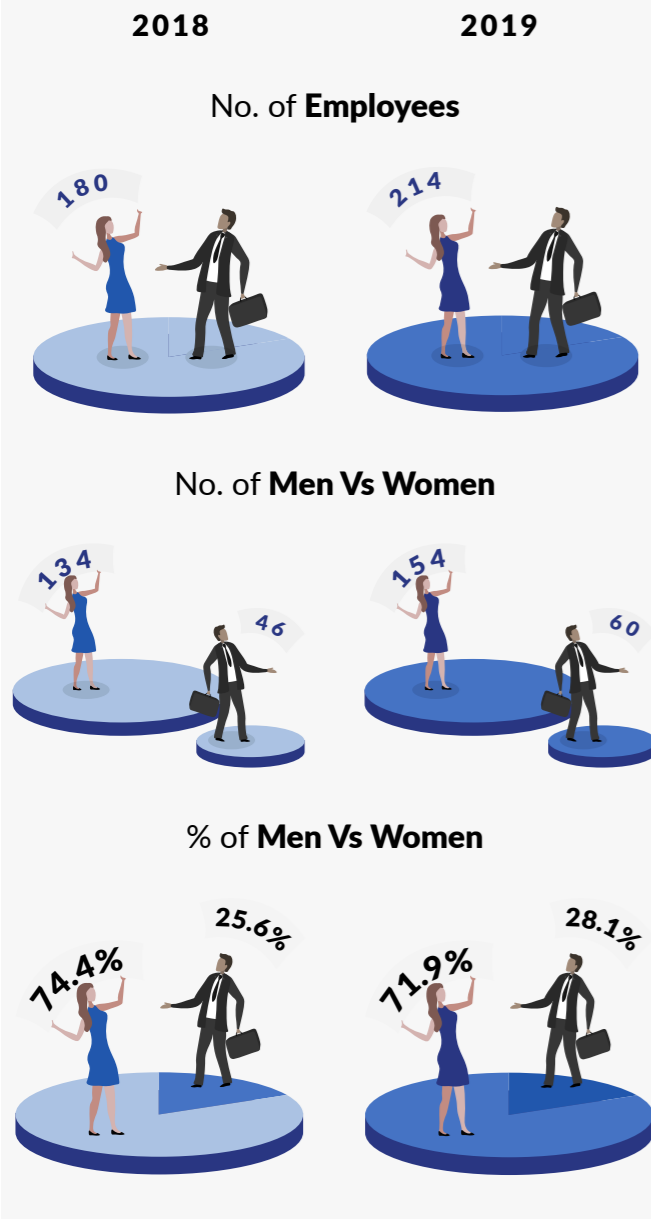
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OUR PRINCIPLES IN EVERYDAY CULTURE

OUR EMPLOYEES

At HRA Pharma, our employees are at the core of everything we do. With a strong people development philosophy, we encourage staff to contribute ideas, seek out new challenges and achieve their personal goals.

2018-2019 FIGURES: EMPLOYEE BREAKDOWN



Trust, Passion and Results-Driven are the core values that define HRA Pharma, and are integrated throughout the business by our Momentum Ambassadors. Our Momentum culture is designed to support internal communication and people integration to ensure an engaged and open-minded community at all levels of the business.

Our workforce is constantly growing, and as a result, the human resources department has expanded to constantly and effectively monitor the health, safety, professional training and fair treatment of employees.

2018 ended with the relocation of our company to new, better suited premises, specifically designed to facilitate more synergistic working practices across the business. Located in Châtillon, 200 avenue de Paris, these premises include creative rooms, co-working spaces, brainstorming spaces, open areas, informal spaces and a state-of-the art canteen. Shared with our French subsidiaries HRA Pharma France and HRA Pharma Rare Diseases, the workspace is perfect to suit HRA's growing needs.

At HRA, we strive for a working environment based on mutual respect and trust, and care about the wellbeing and work-life balance of our workforce. Employee benefits include access to corporate health insurance, flexible working, weekly telecommuting and childcare assistance. We also continue to develop home-office tools to enable each person to work to the best of their ability, wherever they may be.

Women hold key roles in all departments, including: marketing, regulatory, pharmacovigilance, research, manufacture, supply chain, legal and compliance, accounting and finance, and human resources.

There is something special about working for HRA Pharma; a fast-growing, innovative consumer healthcare company that remains true to its commitment to women and those affected by rare diseases.

05

Business Ethics

DUE DILIGENCE WITH PARTNERS

In 2018, HRA Pharma rolled out a due diligence program for new partners, focusing on anti-corruption and ethics policies. Over the course of 2018 and 2019, a total of 17 due diligence checks were conducted on partners.

WHISTLEBLOWING TOOLS IN PLACE

In accordance with the “Sapin 2” Act, HRA Pharma established an appropriate procedure for collecting reports issued by staff members or by external and occasional partners. In alignment with legal requirements including confidentiality, the following email address was set up for those concerned by any HRA activity: alert@EthicHRA.com. All employees and suppliers are made aware of this policy through training sessions.

For reference: all concerned people can report issues or risks that they have become aware of relating to HRA Pharma’s activity, that they can reasonably or objectively consider to constitute a crime or offence, a clear and serious infringement of a law, regulation, or international commitment, or a threat or serious public damage to the public interest.

05

BUSINESS ETHICS

COMPLIANCE TRAINING PROGRAM

In 2018, HRA Pharma launched a training program to educate its workforce in compliance.

Training sessions are provided for all employees to ensure that employees understand HRA Pharma’s policies. Training is conducted in face-to-face meetings or via digital platforms and are tested frequently to ensure alignment with company guidelines.

HRA Pharma has since appointed a dedicated team, including a chief compliance officer, to handle compliance issues at all levels.

CODE OF ETHICS

2018 also saw the completion of HRA Pharma’s written policies on ethical business conduct. These policies cover prohibited behaviours in the field of fair competition, anti-corruption and trade with legal or natural persons concerned with international or national sanction programs.

Available at all times, they are the reference tool for employees, are used heavily in training sessions and are referred to in all employee contracts.

TRANSPARENCY INTO BUSINESS ETHICS

In addition to the principles of ethical business conduct, regular emphasis is placed on transparency obligations to which HRA Pharma, as a pharmaceutical company, is committed both in France and abroad.

Our company relies on an international network of regulatory consultants who help us to comply with increasingly stringent transparency rules.

PERSONAL DATA

When GDPR came into effect in 2018, HRA Pharma was already familiar with personal data issues due to the French regulation framework “Loi Informatique et Libertés” as well as pharmacovigilance, medical information and clinical research activities in Europe and the United States.

However, further steps had to be taken with the European regulation on the processing of personal data, which came into force in May 2018. At that time, HRA Pharma notified the appointment of its Data Protection Officer to the French Data Protection Authority and adopted internal processes to document and ensure full compliance with GDPR policies, notably:

- A procedure for handling complaints and requests from data subjects exercising their rights
- A form for processor assessment
- The systematic use of the “PIA” software provided by the French Personal Data Protection Authority to carry out privacy impact assessments
- The update of the Information and Consent Sheet dedicated to individuals in clinical trials
- The review of HRA’s websites privacy and cookies policies according to GDPR requirements

Our teams have endeavored to both comply with GDPR and provide all those whose personal data are processed, including employees, with clear and relevant information to understand how HRA Pharma proceeds.



06

Commitment to Sustainability

06

COMMITMENT TO SUSTAINABILITY

ENVIRONMENT



HRA Pharma does not directly manufacture the products it sells but remains very vigilant in the choice of its contract manufacturing organisations (CMOs) and other service providers. We have set a level of environmental compliance requirements via an environmental questionnaire to which all CMOs, carriers, and other partners must respond to. HRA Pharma also carries regular physical audits of its partners.

HRA Pharma is dedicated to ensuring that its internal environmental efforts match the level of requirement it demands from its partners. Our new headquarters in Châtillon has already improved our environmental footprint, with a strong focus on energy conservation, recycling, waste and travel limitation. To this effect, we have made several changes to improve our internal environmental approach.

Cardboard cups and bamboo-made coffee stirrers have been introduced to replace single-use plastics. Water bottles have been replaced by economic and ecological water cooler fountains, which are a real energy saver. The carbon footprint of these fountains is 200g/L of Co2 (e).

Additionally, our coffee capsules are 100% recyclable, with used capsules collected by our provider. The aluminum is melted and used to make new objects, and the coffee grounds are transformed into biogas or agricultural compost.

Other green initiatives include energy efficient household appliances, recycled office supplies and easy-to-use document recycling processes.

Our building is equipped with motion detection lights in the restrooms and corridors, as well as motion detection taps in lavatories.

To reduce the overall carbon footprint of our company, we encourage our employees to use tele-conferences to limit business travel and carbon emissions.

Despite the increase in the number of employees, the figures are encouraging, although there is still some way to go.

ENVIRONMENTAL KEY PERFORMANCE INDICATORS:

	2012	2013	2014	2015	2016	2017	2018	2019
RECYCLING								
Paper A4 & A3 bought (in kg)	1,351	1,435	1,342	2,475	2,300	1,919	872	605
Paper recycled (in kg)	2,022	2,075	2,630	1,950	3,329	3,299	1,752	1,072
Co2 equivalent (in kg)	1,112	1,141	1,447	1,073	1,831	1,814	not reported	not reported
kWh equivalent	8,088	8,300	10,520	7,800	13,316	13,196	not reported	not reported
Recycled plastic cups (in kg)	NA	NA	NA	NA	NA	NA	NA	NA
Recycled batteries (in kg)	NA	NA	NA	NA	NA	NA	NA	NA

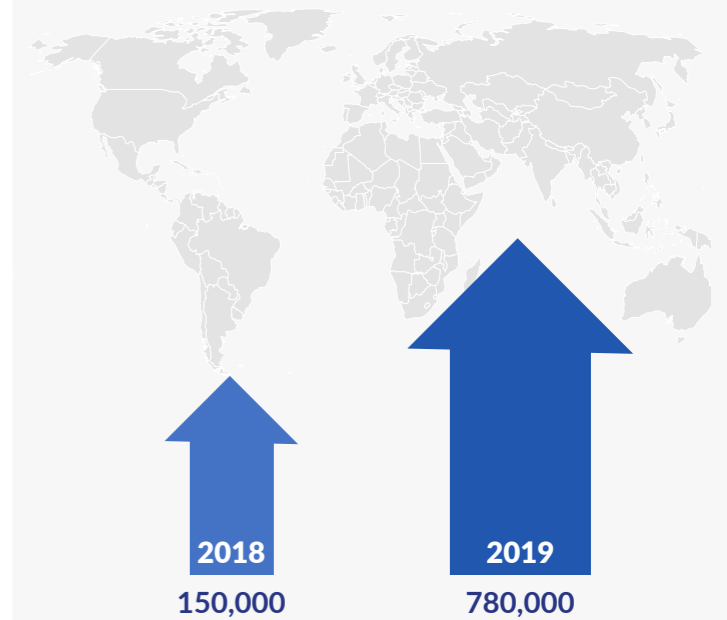


In 2019, HRA went through a carbon footprint exercise performed by CO2Logic, in which HRA's direct emissions of buildings and cars were measured. The outcome was that HRA's emissions amounted to 128 T Co2, which equals to 20 times the average Co2 carbon emission per person in France. Our focus for the coming years will be to become a Co2 neutral company by working on Co2 reductions through fostering more green initiatives.

HRA PHARMA ASSISTANCE PROGRAMS

In 2018, HRA Pharma continued its program of supplying medicines, including contraception treatments and intrauterine devices, to non-governmental organisations for further distribution in less developed countries.

In 2018, 150,000 units of NorLevo® were distributed in developing countries, and more than 780,000 units in 2019.



In addition to these programs, HRA Pharma supports disadvantaged women worldwide through its Corporate Foundation.

Created in 2012, the HRA Pharma Corporate Foundation runs projects supporting education, health, particularly reproductive health, and women's emancipation. For several years, the Foundation has financially contributed to projects building healthcare units and schools, as well as educational projects training midwives and teaching hygiene awareness, especially in Africa, Asia and Latin America.

The Foundation remains aware that the needs are universal and not only located abroad.

It has also helped a diversity of French initiatives, through drama workshops tackling gender differences, helping women in vulnerable situations or victims of violence, and also educating the public on sexual health.

The Foundation actively participates in working groups to achieve the United Nations Millennium Development Goals.

EXTERNAL AUDITS - REVIEW

HRA Pharma have been audited by external auditors on all subjects of ethical compliance, transparency and sustainable behaviour, at the request of our shareholders.

Concluded on June 17th 2019, the most recent audit reported positive results with the encouragement of our continuing ESG efforts.

The audit assessed HRA's ESG performance on the four pillars of sustainability: governance, human capital, environment and stakeholders. The assessment was carried out with the help of HRA's responses to 125 indicators, an ESG due diligence strategy and the ESG roadmap.

Overall, HRA Pharma reported standard or good performance levels across most criteria, and showed good advancement on CSR processes and practices compared to other Astorg portfolio companies.



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