

Principles on Data Ethics

Sanofi fully endorses the Data Ethics Principles as laid out by IFPMA in June 2021 ([link](#)), that encompass Autonomy, Transparency, Data quality, Fairness and non-discrimination, Ethics by design, Responsible data sharing, Responsibility and Accountability.

In addition:

- Sanofi believes that the data ethics framework holds true for use of data in AI systems, in alignment with Sanofi's Responsible AI Position ([RAISE](#)).
- Over and above legal requirements, Sanofi is committed to using all types of data responsibly and ethically, employing processes and controls commensurate with the associated level of risk.
- Data should be relevant, sufficiently representative, free of errors, complete in view of the intended purpose and should meet the highest standards in terms of quality and integrity. To ensure this, sufficient metadata also needs to be shared with potential users of the data to avoid bias and ensure the data is relevant to the intended purposes.
- In relation to responsible sharing of data, robust data governance and management processes are key to ensure any use is compliant with applicable laws, regulations and respects any contractual obligations.
- In relation to transparency, the complexity of some secondary research may create challenges regarding the understandability of information provided to individuals whose personal data we are using. Sanofi will always seek to find an appropriate balance between understandability and technical complexity.

Principles on data ethics approved by Sanofi Bioethics committee (first approval on May 2024)