

赛诺菲社交媒体及个人通讯工具使用 员工行为准则

1. 简介及意义

迅猛发展的互联网技术，极大地改变了人们的生活模式和工作方式，我们与外界的信息交流和沟通也得到了更多便利。除传统渠道，如网站、报刊提供专业的信息外，患者、医务工作者及其他外部利益相关群体现在更多依赖网络相互交流，获取信息、分享感受。

这种公开交流不仅在日常业务活动中能够获取更加实时、直接、丰富的观点和反馈，同时也带来了新的机遇和责任。

鉴于社交媒体和个人通讯工具（个人电子邮箱等）的特性，所有内容均可被追溯、被快速传播、容易被断章取义、难以被删除或移动，因此为了保护员工利益、保护公司和品牌声誉，特颁布本准则，帮助大家以适当有效的方式合理使用社交媒体及个人通讯工具，以符合公司数据保护和风险管理的目标。

2. 定义及适用范围

社交媒体和个人通讯工具是指可以进行社交互动活动的网络平台。

社交媒体包括：

- ✓ 即时交流类平台，如微信（包括群组讨论及朋友圈）、QQ、Skype 等
- ✓ 社交网站，如微博、SNS(开心网、人人网)、博客、百度贴吧、Facebook、Twitter、LinkedIn 等
- ✓ 视频 / 照片共享网站，如优酷土豆、YouTube、Flickr、Instagram 等
- ✓ 百度百科、百度文库、维基百科及其它可上传文件的网站
- ✓ 行业网站、论坛及订阅号，如丁香园、医脉通等
- ✓ 其它任何上文未有提及的互动媒体

本行为准则适用于赛诺菲中国的所有员工，包括制药运营、健康药业、疫苗、研发中心、工业事务和集团职能部门。本政策针对赛诺菲中国及其旗下各子公司所有因私或因公使用社交媒体和个人通讯工具的员工，包括正式员工及第三方派遣的员工。

3. 准则

社交媒体和个人通讯工具的使用包括以任何形式参与、发布、转发、讨论与赛诺菲相关的话题，内容包括但不限于公司产品、财务运营状况、竞争对手、员工及人事信息（人事变动、招聘信息、薪资福利等）、客户信息和其他与业务相关的个人或机构等。

****公司、事业部、职能部门等使用社交媒体进行内外部宣传属公司行为，请参照公司数字化项目的管理流程相关规定。**

- **与赛诺菲和/或其产品相关的信息**
 - 只有获得交流传媒部书面授权的员工才能发布和/或参与讨论与赛诺菲及其产品相关的评论或信息。如业绩、发展前景、人事动态、客户信息等。
 - 未经公司授权，员工不得 1) 代表公司发表任何观点，或者以赛诺菲公司或赛诺菲公司员工的名义对于来自社交媒体上的受众的质询或投诉给予解释或回应；2) 发布和/或转发除赛诺菲集团和赛诺菲中国官方对外发布的信息；3) 在社交媒体上讨论时使用赛诺菲标识，包括但不限于公司、部门、产品、活动标识。
 -
 - 如有媒体询问，您应建议其联系交流传媒部指定联络人：
刘莎莎 (Liu Shasha) shasha.liu@sanofi.com

- **禁止发表与竞争对手及其产品、其他医药相关企业或机构有关的文章、评论或意见。**

- **不良事件/负面报道**
 - 如果您在使用社交媒体时发现了任何与赛诺菲产品相关的药物警戒数据，您须在一个工作日内联系药物警戒部。“药物警戒数据”是指：不良事件、误用的报告、给药错误、不符合说明书的使用、药物过量、药物滥用、缺乏疗效、致病原的疑似传播、妊娠期间药物暴露或哺乳期间儿童暴露、职业暴露以及非预期的有益作用

药物警戒联系方式

邮箱: pv.cn@sanofi.com

传真: 021-60123587

电话: 021-22266277, 021-22266269, 13601911274 (移动号码仅限非工作时间)

- 如果在浏览社交媒体时发现产品投诉，必须在 **24 小时内**或下一个工作日内向运营质量专员报告。

产品投诉联系方式

邮箱: PTC.CN@sanofi.com

- 如果在浏览社交媒体时，发现任何有关赛诺菲产品的疑似假药信息，必须将相关内容尽快发送至安全事务部 (security.china@sanofi.com)。
 - 如果在浏览社交媒体时，看到网络传言 (非本公司官方渠道发布的信息)，请勿转发、评论，将此信息的截图或链接发送至 communication.china@sanofi.com，并抄送你的直线经理。
- **在社交媒体或个人通讯工具注册身份时：**
 - 除非您事先获得具体明确的授权，否则不得：
 - ◆ 创建、使用包含赛诺菲及其关联公司的名称和/或赛诺菲及其关联公司的产品名称的用户名或昵称。例如，“sanofi_pierre”或“波立维小英雄”均不可接受。

- ◆ 在发布的信息中包含赛诺菲以及第三方的公司标识、商标和/或公司的正式名称。
- ◆ 使用业务邮箱注册帐号（例如@sanofi.com）。
- 在某些特定的情况下，员工可表明自己是赛诺菲的员工，例如浏览 LinkedIn 或其他面向职场的社交媒体网站。
- 在发布可能与赛诺菲相关的信息时，您应发表一份免责声明，表明**本信息表明的是您的个人意见，不以任何方式代表公司立场。**
- **尊重知识产权**
如未获得事先明确的授权，勿擅自在社交媒体上发布任何受知识产权（商标、著作权等）保护的内容，如音乐、视频、著作、产品和标识等。在发布受知识产权保护的内容前，请务必先获取相关授权。
- **确保信息安全**
未经交流传媒部书面授权，请勿在社交媒体发布任何有赛诺菲或产品标示的照片及视频。请勿在个人社交媒体上传播业务信息以及其他机密信息（详见后附机密信息清单）。

****根据《合规与商业道德指引手册》，参加产品推广活动/展示会或学术活动时，可根据报账要求拍摄“会场照片”，但请确保此类照片仅用于报账，不在任何社交媒体发布。**

实例



定义：微信是一个为智能终端提供即时通讯和其他服务的应用程序，供单独聊天、建立群组、并在朋友圈分享图文视频等。

- 允许：在征得相关出境人员的同意后，将公司活动（非商务会议）中的照片/视频、感受等在朋友圈中分享；将公司官方发布的信息与朋友分享；如发现任何提及赛诺菲及赛诺菲的不良事件/产品投诉，按公司政策及时上报。
- 不允许：对网络传言（非本公司官方渠道发布的信息）进行评论或转发，发布商务会议上传递的业务信息或图文视频资料；在群组讨论及朋友圈中分享、评论、转发包含但不限于公司产品、业务运营、指标奖金、竞争对手、人事（人事变动、薪资福利）、客户信息等和业务相关的内容，详见后附机密信息清单。

163 网易免费邮

mail.163.com

定义：由第三方提供，在网站注册就可以得到的免费私人邮箱。

- 允许：发送仅包含个人信息的邮件。

- 不允许：发送包含公司产品、业务运营、指标奖金、竞争对手、人事（人事变动、薪资福利）、客户信息等和业务相关的内容，详见附件机密信息清单。



定义：微博是一个社交网站，允许用户与其关注的用户分享照片和信息、发表个人观点。

- 允许：您可以浏览并参与讨论。若您发现有任何提及赛诺菲和 / 或其产品的不良事件/产品投诉，请按公司政策及时上报。
- 禁止：除非事先获得明确的授权，否则不得参与有关赛诺菲和/或其产品的讨论，或进行评论和回应。



定义：LinkedIn 是全球最大的商业社交网络。

- 允许：您可以更新个人简历并参与互动。
- 禁止：不得因此造成任何赛诺菲及其关联公司保密信息的泄漏。除非事先获得明确的授权，否则不得参与或发起与您目前正在处理的项目或曾参与的项目的公开讨论，也不得代表赛诺菲做出任何回应。



定义：维基百科 / 百度文库是网络百科全书，用户可针对某一话题共同发表文章并进行编辑。

- 允许：您可以阅读任何您感兴趣的文章。
- 禁止：除非事先获得明确的授权，否则不得发表、更改或删除有关赛诺菲和/或其产品及治疗领域的内容。

附件：机密信息清单

机密信息包括但不限于：

- 商业信息
 - ✓ 客户名单，
 - ✓ 医院拜访记录，
 - ✓ 销售实践，
 - ✓ 新产品上市时间表及交付期限，
 - ✓ 竞争对手分析，
 - ✓ 未决定价，
 - ✓ 市场预测和其他市场营销计划，
 - ✓ 与第三方谈判情况，
 - ✓ 终止或签订某协议的意图等商业信息。
- 财务信息
 - ✓ 预算，
 - ✓ 销售数据选编，
 - ✓ 特定产品的成本及利润边际，
 - ✓ 其他非公开的财务审计和会计信息。
- 组织机构信息
 - ✓ 在授权可公开披露之前有关新设、关闭、扩张和调整等组织机构变动的信息，
 - ✓ 未正式公布的重要人员或其他职责的变动的信息。
- 人力资源信息

敏感的个人资料，例如：

 - ✓ 薪酬，
 - ✓ 医疗记录，
 - ✓ 业绩评估或评审，
 - ✓ 个人简历及人事档案，
 - ✓ 私人及/或职业性信函等。
- 研发信息
 - ✓ 与公司的研发项目有关的信息，
 - ✓ 科学技术数据，包括但不限于新分子的发现及活跃性的评价，工艺改良，临床试验结果，
 - ✓ 关键配方和商业秘密。
- 技术信息
 - ✓ 产品或流程说明书，
 - ✓ 生产工艺，
 - ✓ 测试结果和设计，

- ✓ 专有软件，
- ✓ 内部开发或许可开发的信息技术程序，
- ✓ 专有材料供应商的名称及身份。
- 战略方案
 - ✓ 长期战略计划，
 - ✓ 合并和收购计划，
 - ✓ 资产剥离，
 - ✓ 许可协议，
 - ✓ 合作协议及其他协议，
 - ✓ 运作方案。
- 第三方信息
 - 包括但不限于
 - ✓ 临床试验中获得的个人信息，
 - ✓ 职能工作中获知的且根据合同负有保密责任的第三方商业秘密。
- 其他文档和信息
 - ✓ 不为公众所知且与公司的任何业务和运营有关的其他文档和信息，该等文档和信息可以提供这样一个机会，使得相比不拥有或不知晓该文档的竞争对手具有某种优势，或对公司而言具有其他商业价值；或由公司政策定义、或公司管理层决定的需要一定级别保密程度的文档和信息， 包括公司政策本身。
- 与利益相关方有关的敏感个人数据
 - 包括但不限于
 - ✓ 姓，
 - ✓ 名，
 - ✓ 身份证号码，
 - ✓ 工作和家庭地址，
 - ✓ 电话号码，
 - ✓ 个人保险号码，
 - ✓ 公民身份，
 - ✓ 照片，
 - ✓ 婚姻状况，
 - ✓ 种族或民族，
 - ✓ 政治主张，
 - ✓ 宗教信仰，
 - ✓ 工会成员资格，
 - ✓ 性生活，
 - ✓ 健康相关的数据等。

Sanofi China Policy for Use of Social Media and Personal Communication Tools

1. Introduction

The Internet has dramatically revolutionized many different fields. It has changed the way we live, bringing more convenience for communicating and information sharing. Besides traditional media such as newspapers, patients, customers and other external stakeholders become more rely on the Internet to get information, interact and share experiences.

This open conversation provides an incredible wealth of insight for our daily activities while creating new opportunities, responsibilities and risks.

Due to the public nature of social media and personal communication tools (such as personal email account).content is easily traceable; can be propagated across the Internet rapidly; can be taken out of context; and can be very difficult to delete, retract or remove, Sanofi China recognizes the need to have a specific policy that will ensure that employees use social media and personal communication tools in a proper and responsible way, in accordance with the company data protection & risk management objectives, to protect our company, our brand and themselves.

2. Definition and scope

Social media and personal communication tools are internal and external web-based platforms that enable people to interact socially with each other.

Social media includes:

- ✓ Instant messaging: WeChat (Group Chat and Circle of Friends), QQ, Skype, etc.
- ✓ Social websites: Weibo, SNS (kaixin001 and renren), blogs, tieba.baidu.com, Facebook, Twitter, LinkedIn, etc.
- ✓ Video/picture-sharing websites: Youku, Tudou, YouTube, Flickr, Instagram, etc.
- ✓ Wenku.baidu.com, Wiki and other websites for uploading documents
- ✓ Industry websites, subscriptions and forums: DXY.com, medlive.cn, etc.
- ✓ Other interactive platforms not mentioned above
- ✓

This policy applies to all employees of Sanofi China, including GEM, CHC, Vaccine, R&D, Industrial Affairs and Corporate Support Functions. This policy applies to all employees (including contracted employees) of Sanofi and its affiliates in China who engage in personal or business use of social media and personal communication tools.

3. Guidelines

The use of social media and personal communication tools include social media engagement that relates in any way to Sanofi, its products, business and operations, competitors, employees and HR, clients, and other business-related individuals or organizations.

** Organizational usage of social media by company, business unit or enabling function needs to refer to digital project management SOP.

- **Information related to Sanofi and/or its products**

- Only got the written authorization by communications, the users are permitted to engage in discussions or posts about Sanofi and its products, including financial results and outlook, sales, HR updates and client information.
- Without special authorization from the company, when using social media, employees are not permitted to: 1) discuss Sanofi or Sanofi products; 2) give your opinion or response to questions/complaints in the name of Sanofi or Sanofi employees; 3) post / retweet any company and product-related information, other than official news released by the Sanofi Group or Sanofi China; 4) use Sanofi's logo, including but not limited to the company logo, department logos, product logos and project logos.
- If you receive any media inquiries, please forward them to Shasha Liu in Group Communications (shasha.liu@sanofi.com).

- **Do not engage in any discussion, posting or comment on competitors or their products, or other healthcare companies or organizations when using social media.**

- **Adverse events/PC/rumors or messages not published by Sanofi**

- You are obligated to report pharmacovigilance data associated with the use of Sanofi products that you become aware of online and in social media to the Pharmacovigilance Department within one working day. The pharmacovigilance data includes: Adverse Event; report of misuse; medication error; off-label use; overdose; drug abuse; lack of efficacy; suspected transmission of infectious agents; drug exposure during pregnancy or child exposure during breastfeeding; occupational exposure and unanticipated beneficial effects.

Contact the Pharmacovigilance Department

Email: pv.cn@sanofi.com

Fax: 021-6012-3587

Tel: 021-2226-6277, 2226-6269, 136-0191-1274 (for non-working hours only)

- If you find any information on Product Complaints (PC) when browsing social media, you are

obligated to forward the information as soon as possible and within 24 hours (or the next working day) to the Operation Quality Responsible (PTC.CN@sanofi.com).

- If you do find any information on suspected Sanofi counterfeited products when browsing the social media, you do have to forward the related information as soon as possible to Security (security.china@sanofi.com).
- Please do NOT spread or comment on any information about Sanofi that is not communicated through official channels. Please send a screenshot to communication.china@sanofi.com and copy your line manager.

- **When establishing accounts on social media**

- Unless you have received prior, specific and express authorization, you should never:
 - ◆ Create an account or username that includes any Sanofi or affiliate company name and/or product name. For example, “sanofi_pierre” and “plavixhero” are not acceptable.
 - ◆ Include any Sanofi logo, trademark, and/or official company designation or that of a third party in postings.
 - ◆ Use professional email address (e.g. @sanofi.com)
- It may be acceptable for employees to identify themselves as Sanofi employees, such as on LinkedIn or other career-focused social media sites.
- In any private post that could be associated with Sanofi, you should insert a disclaimer stating that you work for Sanofi and that the views expressed in the post are yours and do not represent the position of Sanofi in any way.

- **Respect intellectual property rights**

Unless you have received prior and specific authorization, you should never post any content (e.g., trademarks or copyrights) that is protected by intellectual property rights, including but not limited to music, video, books, products and logos.

- **Ensure information security**

Unless you have received written authorization by communications, it is forbidden to post any pictures and videos with company logo or products logo during business meetings organized by Sanofi, or post any business information or confidential information (please refer to the appendix) on social media.

****According to the *Manual of Ethics and Business Integrity Guidelines*, during product presentations, promotional events/meetings and scientific events, taking pictures is only allowed for reimbursement**

purpose. Such pictures may not be posted on any social media.

Examples:



Definition: A mobile text and voice messaging communication service platform.

- Dos: You may post pictures/videos and text messages about company activities (except business meetings) with the consent of others who may be involved. You can share official and authorized company information. You are obligated to report any adverse events and PC according to the company policy.
- Don'ts: You should never comment on or forward any message that is not published by Sanofi, or post any business information received during business meetings. Do not share, comment on and retweet business and product information, information on business operations, sales targets and incentive schemes, information about competitors, HR-related information (such as personnel changes, recruitment information, salary and welfare), client information and other confidential information (referring to the appendix) on WeChat Group Chat or Moments (Circle of Friends).



Definition: Free mailbox provided by a third party.

- Dos: Send mail only with personal information.
- Don'ts: It is not permitted to send any business-related messages and information via personal mailbox.



Definition: A social media platform that enables people to share pictures and post personal information and opinions.

- Dos: You may browse pages and engage in discussions. If you observe any adverse events or negative comments about Sanofi and/or its products, please send a timely report according to the company policy.
- Don'ts: Unless you have received prior and specific authorization, you should never engage in any discussion, posting or comment on Sanofi and/or its products.

LinkedIn

Definition: LinkedIn is the biggest business social network in the world.

- Dos: You can update your personal CV and engage in social networking.
- Don'ts: Do not disclose any confidential information about Sanofi or its affiliates. Unless you have received prior and specific authorization, you should never engage in or initiate an open discussion on projects that you are working on or have worked on, and you should never give a response on behalf of Sanofi.



Definition: Wikipedia and wenku.baidu.com are Internet encyclopaedias. Users can upload and edit articles on a common topic.

- Dos: You can read any article you are interested in.
- Don'ts: Unless you have received prior and specific authorization, you should never post, edit or remove any content about Sanofi and/or its products or related therapeutic areas.

Appendix List of Confidential information

Confidential information includes but not limited to:

- Business information
 - ✓ Customer lists,
 - ✓ Records of hospital visit,
 - ✓ Selling practices,
 - ✓ Schedules of new product availability and delivery periods,
 - ✓ Competitor analysis,
 - ✓ Pending price changes,
 - ✓ In-house marketing forecasts and other marketing plans,
 - ✓ Status of negotiations with third parties,
 - ✓ Intention to establish or terminate an agreement and other business information.
- Financial information
 - ✓ Budget,
 - ✓ Selected sales data,
 - ✓ Product costs and profit margins on specific products,
 - ✓ Other non-public financial audit and accounting information.
- Organizational information
 - ✓ Opening, closing, expanding or modifying of facilities until the time and date specifically authorized or public disclosed,
 - ✓ Transfer of responsibilities or transfer of key employees until formal announcement.
- Human Resources information

Sensitive personal data pertaining to individuals such as

 - ✓ Salaries and compensation,
 - ✓ Medical records,
 - ✓ Performance appraisals or review,
 - ✓ Personal history statements and personal files,
 - ✓ Letter of a personal and/or professional nature.
- Research and Development information
 - ✓ Sponsored research and development projects,
 - ✓ Scientific data including but not limited to new molecules found and activity evaluation, process development, results of clinical trials,
 - ✓ Critical formulas and trade secrets.
- Technical information
 - ✓ Product or process specification,
 - ✓ Manufacturing process,
 - ✓ Test designs and results,
 - ✓ Unique software,

- ✓ IT programs developed in-house or licensed-in,
- ✓ Identify of vendors and suppliers of unique materials
- Strategic plans
 - ✓ Long-range strategic plans,
 - ✓ Merger and acquisition plans,
 - ✓ Divestiture,
 - ✓ Licensing,
 - ✓ Co-promotion agreements and other agreements,
 - ✓ Operational Plans.
- Third party information
 - Including but not limited to
 - ✓ Personal data involved in clinical trials,
 - ✓ Third party trade secret obtained during professional function and obliged to keep confidential under a contract.
- Other documentation and information
 - ✓ Documentation and information not known to the general public and relating to any Sanofi business or operations, which provides an opportunity to obtain an advantage over competitors, or otherwise having commercial value to the company, or documentation and information defined under company policy or determined by managements to require certain level of protection, including company policy itself.
- Stakeholder related sensitive personal data
 - Including but not limited to
 - ✓ Last name,
 - ✓ First name,
 - ✓ Identity number,
 - ✓ Business and home address,
 - ✓ Phone number,
 - ✓ Personal insurance number,
 - ✓ Citizenship,
 - ✓ Photography,
 - ✓ Marital status,
 - ✓ Racial or ethnic origin,
 - ✓ Political opinions,
 - ✓ Religious or philosophical beliefs,
 - ✓ Trade-union membership,
 - ✓ Sex life,
 - ✓ Health status etc.