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	Anti-Bribery and Corruption Policy	Version No.	1
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ANTI-BRIBERY AND CORRUPTION POLICY

1. PURPOSE

The purposes of this Global Policy ("Policy") are:

- (1) To ensure that Advanz Pharma personnel comply with the anti-bribery and corruption laws in those jurisdictions in which they operate; and
- (2) To minimize bribery and commercial risks, particularly in high risk of corruption countries and sectors, by providing a transparent and properly authorized process for the appointment and commercial management of business partners.

2. SCOPE

This Policy applies across all parts of the Advanz Pharma Corp. ("Advanz Pharma") group, including all of its subsidiaries globally (individually a "Advanz Pharma Group Company"; collectively "Advanz Pharma Group"), and to all persons ("Advanz Pharma Colleagues") working for the Advanz Pharma Group or acting on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners, or any other person associated with the Advanz Pharma Group, wherever located.

References to "employees" should be construed to include any person performing duties for or on behalf of an Advanz Pharma Group Company, including employees, directors, non-executive directors or officers of an Advanz Pharma Group Company.


References to "third party" means any entity that is not part of (or an individual that is not employed by) the Advanz Pharma Group.

Dealing with third parties:

Advanz Pharma engages many different types of third parties to do a variety of work for it - including third parties involved in selling, marketing or otherwise commercialising pharmaceutical products; third parties involved in manufacturing or supplying pharmaceutical products; and third parties involved in providing other products and services to Advanz Pharma (e.g. regulatory consultants, medical writing, pharmacovigilance services).

Bribery and corruption risks arise when engaging any third party. This Policy requires that the risks of bribery and corruption involving third parties are assessed and mitigated prior to the engagement of any third party.

Some of the provisions in this Policy apply:

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- whenever **any type of third party** is engaged by Advanz Pharma – see section 5.3.
- whenever **a third party which is a Business Partner** (see definition below) is engaged – see sections 5.4, 6.1 and 6.2.
- whenever **a third party which is not a Business Partner** is engaged – see section 6.3.

3. DEFINED TERMS

3.1. "Bribery" means an promise, offer, grant or receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of the enterprise's business. In many jurisdictions bribery is a criminal offence. In some jurisdictions, corporations as well as individuals can be held criminally liable for bribery.

3.2. "Business Partner" means any third party which has been appointed by an Advanz Pharma Group Company in any role which involves either (i) selling, marketing or otherwise commercialising pharmaceutical products or (ii) manufacturing or supplying pharmaceutical products, as follows:

3.2.1. "Commercial Partners", which include:

3.2.1.1. "Agent": a third-party person or company who acts in a sales role on behalf of an Advanz Pharma Group Company but who neither purchases nor sells goods on his/her/its own account. In some countries (e.g. certain countries in South America or the Middle East) the agency agreement must be formally registered. Remuneration is normally by payment of commission based on a percentage of the sales price obtained from a customer;

3.2.1.2. "Consultant": a third-party person or company where acting in a sales and marketing role, who might advise on the sales activity in a given territory or provide marketing, advice on local pharmaceutical regulation or other legitimate business-related services. Remuneration would normally be fee based (e.g. a fixed term retainer);


3.2.1.3. "Distributor": a third party which purchases goods from Advanz Pharma and resells to the end user customer; and

3.2.1.4. "Value Added Resaler" or "VAR": a third-party person or entity who purchases an Advanz Pharma Group Company's product and incorporates them into other products or services that are provided to an end user customer.

3.2.2. "Manufacturers/Suppliers", which include:

- 3.2.2.1. "Contract Manufacturing Organization" ("CMO") or "Contract Development and Manufacturing Organization" ("CDMO"): a third party person or entity who provides comprehensive services relating to the pre-commercialisation stage of any pharmaceutical product to any Advanz Pharma Group Company, which may include, but are not limited to, any of the following services: pre-formulation, formulation development, stability studies, method development, pre-clinical and Phase I clinical trial materials, late-stage clinical trial materials, formal stability, scale-up, registration batches and commercial production; and
- 3.2.2.2. "Manufacturer or Supplier of Active Pharmaceutical Ingredients ("API") and intermediate or finished products": a third-party entity which synthesises, manufactures and/or supplies APIs, intermediates or finished products to an Advanz Pharma Group Company.

- 3.3. "Advanz Pharma" has the meaning given in Section 2 (Scope).
- 3.4. "Advanz Pharma Colleagues" has the meaning given in Section 2 (Scope).
- 3.5. "Advanz Pharma Compliance Officer" means the individual with responsibility for anti-bribery and corruption compliance within the territory in which the relevant Advanz Pharma Group Company is located.
- 3.6. "Finance" means the finance department of the Advanz Pharma Group.
- 3.7. "Gifts" means any item, cash, goods/kind, or any service which is given or received for personal benefits at no cost, or at a cost for which the recipient pays less than its commercial value.
- 3.8. "Hospitality" means any food, drink, travel, accommodation or entertainment provided free of charge or heavily discounted.
- 3.9. "Legal" means the legal department of the Advanz Pharma Group.
- 3.10. "Screened ABC Business Partner List" means the list of all Business Partners screened by Legal for anti-bribery and corruption compliance purposes and maintained on the anti-bribery and corruption database.

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4. RESPONSIBILITIES

4.1. All Advanz Pharma Colleagues are responsible for:

- (a) complying at all times with this Policy;
- (b) communicating this Policy and its requirements to Business Partners;
- (c) where applicable submitting detailed information about the entity to Legal for screening;
- (d) reporting to Legal all hospitality and gifts given, received or declined from or to a Business Partner;
- (e) monitoring commercial transactions for potential signs of bribery or improper conduct (see for example, “Red Flags” list on Appendix A) and reporting such incidents to Legal; and,
- (f) reporting any known or suspected violations of the Anti-Bribery and Corruption Policy to the Advanz Pharma Compliance Officer.

4.2. Finance is responsible for authorizing the rate of commission or fee payable to a Business Partner.


4.3. Legal is responsible for:

- (a) when required in accordance with this Policy, screening of Business Partners and conducting due diligence on Business Partners (see Appendix B and C);
- (b) recording the outcome of the screening and maintaining such records in the anti-bribery and corruption (“ABC”) database;
- (c) maintaining a file on each Business Partner; and,
- (d) communicating the outcome of the screening to the appropriate Advanz Pharma Colleague(s).

5. PRINCIPLES

5.1. Advanz Pharma has a zero-tolerance approach to bribery and corruption.


5.2. It is expressly forbidden for any employee or person associated with Advanz Pharma, and for any affiliate or subsidiary to offer, promise, give, request or accept bribes or any other unethical inducement, including facilitation payments, for the purposes of obtaining or retaining business on behalf of Advanz Pharma, whether with a private person(s) or

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government official (s) or public official(s).

5.3. When Advanz Pharma enters into any transaction with the following categories of Business Partner, due diligence and an anti-corruption and bribery risk assessment must be conducted:

- (a) New Commercial Partners – due diligence / risk assessment to be conducted prior to the appointment of any new Commercial Partner save that, where the Commercial Partner is to be appointed as part of a pipeline project, licence and supply arrangement or business development agreement and the requirement to carry out due diligence / risk assessment prior to an appointment will disadvantage ADVANZ PHARMA’s business, this may be completed within 3 months of the appointment of the new Commercial Partner. In all cases due diligence / risk assessment must be carried out prior to the grant of market authorisation or sale of the relevant product(s);
- (b) Existing Commercial Partners - “refresher” due diligence / risk assessment to be conducted at least once every five (5) years, unless:
 - i. the Commercial Partner is operating in a territory where the TI Perceptions of Corruption Index is 43 or lower, in which case the due diligence / risk assessment shall be conducted at least once every three (3) years; or
 - ii. if any Advanz Pharma employee becomes aware of an issue during the term of an agreement which merits additional due diligence and anti-bribery risk assessment being carried out on an existing Commercial Partner, in which case the due diligence / risk assessment shall be conducted as soon as practicable after the potential issue comes to light.
- (c) Manufacturers/Suppliers - due diligence / risk assessment to be conducted
 - i. prior to the appointment of a Manufacturer/Supplier if that Manufacturer/Supplier is established in a territory where the TI Perceptions of Corruption Index is 43 or lower, or where any part of the manufacturing process for goods to be supplied to Advanz Pharma will take place in such a territory save that, where the Manufacturer/Supplier is to be appointed as part of a pipeline project, licence and supply arrangement or business development agreement and the requirement to carry out due diligence / risk assessment prior to an appointment will disadvantage ADVANZ PHARMA’s business, this may be completed within 3 months of the appointment of the new Manufacturer/Supplier. In all cases due diligence / risk assessment must be carried out prior to manufacture or supply of the relevant product(s) (as relevant);
 - ii. on a “refresher” basis, on those Manufacturers/Suppliers referred to in Section (c) i, at least once every three (3) years; or


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- iii. if any Advanz Pharma employee becomes aware of an issue during the term of an agreement which merits additional due diligence and anti-bribery risk assessment being carried out on an existing Manufacturer/Supplier.

6. PROCESS/PROCEDURE


6.1. Business Partner Due Diligence and Risk Assessment

If required by Section 5.3, the following Business Partner due diligence and anti-corruption and bribery risk assessment must be undertaken:

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6.1.1	Advanz Pharma Business Manager	<ol style="list-style-type: none"> 1. Unless one of the exceptions set out in paragraph 5.3 (a) or 5.3 (c) above applies, prior to the appointment of the Business Partner, the Advanz Pharma person responsible for the business project (the "Advanz Pharma Business Manager") must send the prospective Business Partner a Business Partner Application Form (the "Application Form", see Appendix C). 2. Once the prospective Business Partner has completed the Application Form, the Advanz Pharma Business Manager must provide it to Legal for review. 3. Before referring the Application Form to Legal, the Advanz Pharma Business Manager must consider whether the appointment of the Business Partner is likely to present any increased anti-bribery and corruption risk and must have regard to any Red Flags listed on Appendix A. 4. Consult with applicable sales director regarding rate of commission or fee payable to Business Partner. 5. Refer fee structure to Finance for authorization. In the event that sales commission exceeds five percent (5%), then both the applicable Director of Finance and the designated Advanz Pharma Legal counsel for the relevant Advanz Pharma Group Company (or the General Counsel) must approve the fee structure.
6.1.2	Finance	<ol style="list-style-type: none"> 6. Evaluate payment structure to ensure that commissions and fees are of an amount appropriate and proportionate to the scale of the business transaction such that they can be justified against the efforts of the Business Partner and aligned to the achievement of the objectives of the appointment.

6.1.3	Legal	<ol style="list-style-type: none"> 7. Using the information in the Application Form, Legal shall conduct due diligence on the Business Partner utilizing the Due Diligence Checklist at Appendix B. 8. Legal shall also consider any other anti-bribery and corruption issues that may arise from the appointment and shall consider any Red Flags. 9. Where the screening and evaluation by Legal does not identify any anti-bribery and corruption issues: (a) Legal will advise the Advanz Pharma Business Manager that the appointment may proceed, (b) Legal will also add the name of the Business Partner to the Screened ABC Business Partner List; and, (c) Legal will maintain a file on that Business Partner 10. A record of the enquiries undertaken and any evidence relied upon will be retained by Legal on the Business Partner's file on the ABC database. 11. In the event that Legal identifies anti-bribery and corruption issues related to the appointment of the Business Partner, then Legal will advise the Advanz Pharma Business Manager as to: (a) whether the appointment may proceed, and/or (b) whether any other steps are required to be taken.
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6.2 Appointments of ALL Business Partners must be reflected in a written agreement and operated in accordance with the following principles.

6.2.1	Advanz Pharma Colleague	<ol style="list-style-type: none"> 1. Ensure that a written agreement is executed with the Business Partner, taking into account the following: <ol style="list-style-type: none"> (a) Advanz Pharma prefers to use its standard template for agreements; (b) Any material changes, which may increase Advanz Pharma's liabilities or risk profile, especially if proposed by the Business Partner, must be approved by the designated Advanz Pharma Legal counsel for the relevant Advanz Pharma Group Company or General Counsel, as applicable, or in their absence, by another senior member of the Legal department; and (c) Advanz Pharma's preference is for the agreement to be governed by English, Canadian or U.S. law. 2. Appropriate anti-corruption and bribery clauses must be included in the written agreement. 3. No payment will be made in any circumstances whatsoever unless a signed agreement has been executed, and such request for payment
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		<p>is supported by an invoice submitted by the Business Partner to the relevant Advanz Pharma entity. Payments of commission will not be paid in advance of an Agreement or by any other instrument such as a “side letter” or a “letter of appointment”.</p> <p>4. In the event of termination, prior to any discussion with the Business Partner, seek advice from Legal on the most favourable process for Advanz Pharma to terminate the agreement and to minimize any potential liabilities.</p> <p>5. After an agreement has been terminated, no sales or a commission payment should be made to that Business Partner, except where it is a legal obligation within the agreement, for example executing existing pharmaceutical/medical stock orders or addressing outstanding commissions, for sales transactions made prior to a termination event.</p> <p>6. All original agreements should be stored safely and centrally in accordance with internal Advanz Pharma’s retention requirements and having regard to applicable privacy laws (after their expiry) and records maintained of their issue, renewal and termination. A separate ledger must be kept recording all commission payments made to Agents with reference to the relevant authorization and Business Partner invoices.</p>
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6.3 Appointments of third parties which are not Business Partners.

It is Advanz Pharma’s policy that the appointment of any third party to act on behalf of an Advanz Pharma Group Company must be recorded in a written contract.

Whenever an Advanz Pharma Group Company appoints a third party to act on its behalf, due consideration must be given to the risks of bribery and corruption. Appropriate anti-corruption and bribery clauses must be included in the written agreement.

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Particular care should be taken where the Advanz Pharma Group Company is appointing a third party to act on its behalf in relation to any process or procedure involving governments, and government departments, agencies and authorities.

6.4 Hospitality and Gifts

This section is not applicable to healthcare professionals. Separate policies apply regarding the provision of hospitality and gifts to healthcare professionals.

No gift or entertainment to any recipient (including Government/Public Officials and private persons) should ever be received and/or offered by Advanz Employee or Business Partner unless:

- It is consistent with customary business practices;
- It is not excessive in value (i.e. reasonable);
- It is not intended to induce someone to act improperly;
- It cannot be seen by others as a bribe or payoff;
- It is transparent, properly documented; and
- It is authorized by relevant laws, regulations and industry guidelines.


Corporate entertaining and hospitality *can* amount to a bribe *if they are excessive or gratuitous*. For example, lunch or dinner with a third party contractor after a meeting is fine, but extravagant hospitality for that third party to go out to dinner on his/her own, or to an event or weekend away, are likely to be viewed as excessive.

No entertainment and hospitality for the spouses and partners of third party contractors should be provided.

Advanz Pharma Employees or Business Partner should consider the following questions prior to giving or receiving a gift or hospitality:

- Could my acceptance or offer lead to a claim of “undue influence” being made or imply such a position, if the gift or hospitality is accepted?
- Is this gift or hospitality event in reality a ‘sweetener’ to retain business, or could it be claimed to be such?
- Is this gift or hospitality event an inappropriate or secret ‘reward’ for a business transaction?
- Is this gift or hospitality excessive or disproportionate in value?
- Is this gift or hospitality in excess of the social standards of the geography where it is offered or received?
- Could I breach any applicable laws or industry standards or company policy by acquiring it?

If the answer to any of these questions is yes, the gift or hospitality should not be given or received. If unclear as to how to answer these questions, please seek advice from a member of the Legal & Compliance department.

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Monetary limits have been set by Advanz Pharma as to the value of hospitality and gifts that may be given or received by Advanz Pharma Colleagues:

	Canada	United Kingdom	United States	EU	India	Romania
Gift (per gift, per person). Where possible gifts should be Advanz Pharma branded.	\$30 Canadian	£20	\$26 U.S.	€24	INR 1300	RON 112
Hospitality (per person). Advanz Pharma Colleague must accompany that person during the entire hospitality event.	\$150 Canadian	£100	\$130 U.S.	€120	INR 6500	RON 556

All hospitality and gifts **given, received** or **declined** that exceed the monetary limits must: (1) receive prior written approval to be given or received; and, (2) be notified to the General Counsel, as follows:

Step #	Responsible Party	Description of process
6.4.1	Advanz Pharma Colleague	<ol style="list-style-type: none"> 1. Prior to giving or receipt of the gift/hospitality that exceeds monetary limits, the Advanz Pharma Colleague must receive written approval from any of the Chief Executive Officer of the Advanz Pharma Group Company, the Chief Financial Officer of the Advanz Pharma Group Company or the General Counsel. 2. The Advanz Pharma Colleague must notify Legal of all gifts and hospitality given, received or declined that exceed the monetary limits, including any written approval in such notification.

6.4.2.	Legal	<ol style="list-style-type: none"> 3. Record such notification in Advanz Pharma's gifts and hospitality Register. 4. Regular review of Advanz Pharma's gifts and hospitality Register to identify patterns of giving or receipt of gifts and/or hospitality which may be deemed excessive.
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If an Advanz Pharma Employee has given or received the gift/hospitality in excess of the monetary limits and not sought prior approval, **this is a breach of this SOP and is strongly discouraged.**

The Concur expense management system will flag a warning message to employees to ensure they attach a prior approval documentation to their expenses should the hospitality exceed the monetary limit. Where the monetary limit has been exceeded and a prior approval documentation has not been provided, the Concur expense management system will reject the claim and request post-authorisation to be obtained. In such a case an email should be sent to the General Counsel, Chief Finance Officer or Chief Executive Officer (providing it is not to the same individual as is seeking the post-authorisation) supplying the requested information. If the post-authorisation request is accepted, the Legal Department will then prepare a formal deviation report for the post-authorisation, stating the relevant 'business benefit' reason for exceeding the monetary limit.

As there is a need to minimise deviations, please note that employees are allowed up to **3** deviation reports in a year, after which the matter will be referred to the General Counsel for appropriate investigation and possible disciplinary action.

In addition, special rules apply to payments made for the benefit of government officials owing to the risk and perception of bribery that attach to such payments. **Gifts or entertainment (whether cash or non-monetary) to government officials are completely prohibited.** Hospitality may be provided to government officials when the hospitality serves a **legitimate purpose** (for example, the provision of a sandwich lunch for government officials attending an Advanz Pharma office for an inspection or when an Advanz Pharma employee travels to meet them) on the condition that (a) it is modest and (b) the date and nature of the event, name of the government authority or organisation, names of each public official benefitting from the hospitality and value per person are notified to the General Counsel promptly after the event in question:

Step #	Responsible Party	Description of process
6.4.3	Advanz Pharma Colleague	1. The Advanz Pharma Colleague (member of business unit responsible for hosting the event) must promptly (within 7 days of the hospitality event) notify Legal of date of the event, nature of the event, name of the government authority or organisation, names of each public official benefitting from the hospitality and value per person.
6.4.4	Legal	2. Record such notification in Advanz Pharma's gifts and hospitality Register.

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When calculating the value spent when the group is a mixed group of public and non-public officials, e.g. some external lawyers and some public officials, it is suggested that the person reporting the payment should divide the total amount spent by the number in the group, which would give a “per head” figure. They then notify Legal of this “per head” figure x the number of public officials attending.

6.5 Donations to a political party and sponsorships

Advanz Pharma does not make political donations, but employees may make private donations to political parties in accordance with the law provided these activities are not associated with the Advanz Anti-Bribery and Corruption Policy.

Any disbursements made on behalf of or in the name of Advanz Pharma including bona fide charities, other sponsorships, and corporate social responsibility/community projects, must first be approved in accordance with the company’s procedures.

6.6 Books and Records

In accordance with all relevant rules and internal procedures, Advanz Pharma require that all books, records, and accounts are kept in reasonable detail to accurately and fairly reflect all transactions and dispositions of assets and that adequate internal controls are maintained to provide reasonable assurance that management is aware of, and directing, all transactions ethically and in compliance with applicable Advanz Pharma policies and standards.

‘Off-the-books’ accounts and false or deceptive entries in Advanz Pharma books and records are strictly prohibited. All financial transactions must be documented, regularly reviewed and properly accounted for in the books and records of Advanz Pharma.

6.7 Responsibilities


Fostering a culture of integrity throughout Advanz Pharma and clearly communicating on Advanz Pharma’s expectations contribute to reduce the risk of bribery and corruption.

The owner of this Anti-Corruption and Anti-Bribery Policy is the Legal department (General Counsel and Compliance Officer).

It is the responsibility of every manager of Advanz Pharma to implement this Policy within his or her area of functional responsibility and provide guidance to the employees reporting to him or her.

All employees are responsible for adhering to the principles and rules set out in this Policy.

The Compliance Officer is responsible for working with Advanz Pharma employees to ensure the understanding, implementation and enforcement of this Policy. This responsibility

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includes ensuring the existence of appropriate trainings (including online and/or face-to-face trainings).

All local systems, processes, policies and controls that are implemented to ensure compliance with and enforcement of this Policy shall be audited by the Compliance Officer and/or Correvio's external auditors on a frequency determined by the Compliance Officer and General Counsel.

Such auditing should include a general assessment and evaluation of systems, processes, policies and practices related to this Policy. It also should include a review of documentation relating to interactions with Business Partners (as described above).

Reports of the compliance audits should be retained by the Compliance Officer.


6.8 Raising concerns

All staff must raise concerns about any issue or suspicion of malpractice at the earliest possible opportunity. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with the Advanz Pharma Compliance Officer, or with a member of Legal, or through the Advanz Pharma Compliance hotline (refer to the Whistle Blowing Policy).

All reports can be made in confidence and without fear of any retaliation. If making your report through the compliance hotline, you can choose to remain anonymous. All reports raised are taken seriously and, where appropriate, investigated. No employee or individual will be discriminated against in any way as a result of reporting a concern in good faith.

7. COUNTRY SPECIFIC REQUIREMENTS

- 7.1. Personnel must comply with all applicable country and federal laws such as Canada's Corruption of Foreign Public Officials Act of 1998, the U.S. Foreign Corrupt Practices Act of 1977, the U.K. Bribery Act of 2010 and the Swiss Criminal Code as well as the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and related documents.
- 7.2. **Where the local, country or federal laws differ from the requirements stated in this Policy, the most restrictive limitation on Advanz Pharma business practices will apply.**
- 7.3. While not binding law, Advanz Pharma endeavors to comply with globally-adopted standards promulgated by organizations such as the British Standards Institute and the International Organization for Standardization.

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8. REFERENCES

- 8.1. Canada's Corruption of Foreign Public Officials Act of 1998 (S.C. 1998, c.34)
- 8.2. U.K. Bribery Act of 2010 (2010, c. 23)
- 8.3. U.S. Foreign Corrupt Practices Act of 1977 (15 U.S.C. §78dd-1 et.seq.)
- 8.4. Swiss Criminal Code (Articles 322ter to 322quater).
- 8.5. OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and related documents.
- 8.6. British Standards Institute (BS 10500:2010)
- 8.7. International Organization for Standardization (ISO 37001:2016)
- 8.8. Code of Conduct
- 8.9. Whistle Blowing Policy


9. APPENDIX, ATTACHMENTS, AND FORMS


Appendix A – Red Flags List

Appendix B – Due Diligence Checklist

Appendix C – Business Partner Application Form

10. APPROVALS

Approved by	Title	Signature	Date
Robert Sully	General Counsel		September 21, 2020 21:59 BST

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11. DOCUMENT HISTORY

Version No.	History of Change(s)	Revised on	Replaces Document(s)
1.0	This is a new policy and first issue.	New Emilie Pagès	Anti-Bribery and Corruption SOP N°G SOP-LEG-002 Anti-Bribery and Corruption Policy N° GPOL-LEG-002 Gifts & Hospitality – Frequently Asked Questions Consolidation of these 3 documents into this new Policy following Correvio acquisition

APPENDIX A Red Flags List

Whilst the following are not necessarily examples of bribery or improper conduct, they are "Red Flags" which should make you think about whether there is a potential bribery issue which needs to be reported immediately to Legal and/or the Advanz Pharma Compliance Officer.

Risks relating to third parties

- A request from a government official for a small unpublished fee to "oil the wheels" e.g. in customs or to make a governmental permission/act occur more quickly. This is termed a facilitation payment which is a bribe.
- Doing business where unofficial/off-the-record payments/gifts are said to be part of local custom and business practice.
- A request for unusually high or additional agent's or consultant's fees (particularly if they are out of line with market rates or excessive/unjustified for the work undertaken).
- A government official pointing you in the direction of a specific intermediary to act on Advanz Pharma's behalf.
- A request for cash payments, or payments to be made to a country/known tax haven, in which the agent/consultant is not domiciled.
- A counterparty that requests payment to a third party (including relatives and charities) not referenced in the contract/agreement or involving several individuals and companies where there is no obvious relationship between them.
- Transactions where money or property is passed through a consultant or representative with the aim of obtaining or influencing certain government actions or approvals.
- A suggestion that some form of material reward - "a thank you" would be appropriate in return for past or future business.
- The provision of unusually lavish corporate hospitality or a request that you provide such hospitality.
- A refusal by a counterparty or agent to accept an anti-bribery clause in an agreement.

Risks relating to Advanz Pharma staff

- Advanz Pharma employee favours or promotes a particular service provider/supplier when there is no obvious benefit to Advanz Pharma or when other providers offer better value services.
- An employee or agent who is on commission and brings in an unusually high volume of business.
- The receipt of unusually lavish corporate hospitality or gift.

APPENDIX B

DUE DILIGENCE CHECKLIST

The current version of the Checklist should be downloaded from the intranet OR provided by Legal

APPENDIX C

BUSINESS PARTNER APPLICATION FORM

The current version of the Form should be downloaded from the intranet for use with Business Partners
OR provided by Legal