	<b>GLOBAL POLICY</b>	Policy No.	GPOL-LEG-002
	Anti-Bribery and Corruption Policy	Version No.	2
		Effective Date	26-Nov-2018

## 1. PURPOSE

The purposes of this 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 the Advanz Pharma Group companies globally and to all persons 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.


## 3. KEY PRINCIPLES

- 3.1. Advanz Pharma Group is committed to acting professionally, fairly and with integrity in all our business dealings and relationships.
- 3.2. It is expressly forbidden for any employee or person associated with Advanz Pharma Group, 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 Group, whether with a private person(s) or foreign public official(s).

## 4. COUNTRY SPECIFIC REQUIREMENTS

- 4.1. Personnel must comply with all applicable country and federal laws such as Canada's Corruption of Foreign Public Officials Act, the U.S. Foreign Corrupt Practices Act of 1977 and the U.K. Bribery Act of 2010.
- 4.2. 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.
- 4.3. While not binding law, Advanz Pharma Group endeavours to comply with globally-adopted standards promulgated by organizations such as the British Standards Institute and the International Organization for Standardization.

	<b>GLOBAL POLICY</b>	Policy No.	GPOL-LEG-002
--	----------------------	------------	--------------

	Anti-Bribery and Corruption Policy	Version No.	2
		Effective Date	26-Nov-2018

## 5. REFERENCE(S)

- 5.1 Canada's Corruption of Foreign Public Officials Act (S.C. 1998, c.34)
- 5.2 U. K Bribery Act 2010 (2-10, c. 23)
- 5.3 U.S. Foreign Corrupt Practices Act 1977 (15 U.S.C. §78dd-1 et.seq.)
- 5.4 British Standards Institute (BS 10500:2010)
- 5.5 International Organization for Standardization (ISO 37001:2016)

## 6. APPROVALS

Add later

## 7. DOCUMENT HISTORY

Add later
