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Title of SOP: Anti-Bribery & Anti-Corruption			

SOP: Anti-Bribery & Anti-Corruption (ABAC)

AstraZeneca – India

Policy Owners: All Functional Heads of Department

Approved By: Dr. Sanjeev Panchal

DocuSigned by:

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Revision History

Version number	Valid from	Modified sections
9	1 st May 2023	- Page 4, point 4 - Revised reference to “Global standards and local procedures”, to provide clarification as “SOPs” - Page 5, Last point – Clarified that AZ can make political contributions but needs to be approved by CP
8	15th June 2021	- Page 2: Revision History column added for ease of reference - No further changes to ABAC SOP Version 7. Approval sought to comply with re-approval timelines and avoid expiry of the SOP



SOP Anti-Bribery & Anti-Corruption

KEY PRINCIPLES

- **We do not tolerate bribery or other forms of corruption, even if we might lose business.**
- **Bribery involves using something of value to improperly influence someone. *Something of value* includes more than just money.**
- **Bribery risk exists in our interactions with anyone involved in our business, not just public officials.**
- **We do not give or accept bribes, and we do not allow third parties to do so on our behalf.**

WHY IT MATTERS

Bribery and corruption can happen anywhere and in any company. For AstraZeneca, we must be aware of the risk of bribery and corruption not only when we sell and market our products, but also when we conduct all other areas of our business across the globe. Even if it means losing business, we do not tolerate bribery or other forms of corruption.

In addition to being illegal and against our policies, bribery and corruption are harmful to society – patients, families, friends, all of us – as companies who have engaged in this misconduct might inflate prices, reduce quality of their products, or take other shortcuts to make up for the costs.

Use the principles in this Standard, along with our values and behaviours and your own good judgment, to help you make the best decisions as you interact with others. Your good reputation and that of AstraZeneca rely on all of us recognising potential warning signs for bribery and corruption, refusing to tolerate bribery or any other form of corruption, and speaking up to report concerns, even if you are not completely sure there is a problem.

WHAT YOU NEED TO KNOW

Corruption. Corruption is a form of dishonest, fraudulent, or otherwise unethical or illegal conduct by a person in a position of power or public trust (like a public official), based on improper influence. It is an abuse of power or public trust for private gain.

Bribery. Bribery is the most common form of corruption. Bribery means giving or receiving something of value to improperly influence the judgment or conduct of another person. Bribery risk exists in our interactions with public officials and with anyone else involved in our business, such as a customer, vendor, partner, or other stakeholder. Even the perception of a bribe, without any intent, could have serious legal, financial, and reputational consequences.

Something of value. Something of value includes *anything* that could benefit someone else. For example, it could be cash, compensation above market value, gifts, or other things like meals or other hospitality, contributions or sponsorships, business tools or services, access to resources or information, or even personal favours – anything a person may value.

Improper influence. Influence is simply an effort to persuade. For example, we inform HCPs about the safety and efficacy of our products to support their treatment decisions for patients. Influence is *improper* if, for example, we use something of value to induce (encourage) or reward behaviour that is dishonest, unethical, illegal, or a breach of a duty of impartiality, trust, or good faith.

This SOP outlines our key anti-bribery and anti-corruption principles and is complemented by additional SOPs that provide more detail on how we protect ourselves and the company against this risk in various aspects of our daily work. Undisclosed conflicts of interest can create or increase this risk, including the perception of bribery or corruption.

ANTI-BRIBERY / ANTI-CORRUPTION

We Put Patients First and Do the Right Thing

- We conduct our business fairly and legally and do not look for or accept any unethical, unlawful, or dishonest business or personal advantage.
- Whether directly or indirectly, we do not—
 - Give, offer, or promise a bribe
 - Receive, solicit, or agree to accept a bribe; or
 - Authorise anyone else to do these things, including third parties with whom we work.
- For example, we do not exchange (or try to exchange) something of value—
 - To influence, speed up or reward an official action or decision by a public official (for example, a fire safety inspection clearance or construction permit)
 - To induce or reward an action favourable to AstraZeneca (for example, formulary status for a product or award of a tender)
 - To compromise or influence any individual's independent judgment (for example, prescription of one of our products for a patient); or
 - To secure an improper business or personal advantage (for example, access to confidential information as part of competitive bidding process).
- We often exchange things of value with other parties as part of our normal business, and there is nothing wrong with most of these interactions. Our SOPs are intended to help ensure an exchange is not, and does not appear to be, a bribe. For example, when we plan for a meal with a customer, we make sure a business-related discussion is the primary focus of the interaction and the meal is modest, helping us avoid the perception that the meal is intended to, or *could*, improperly influence decisions or actions.
- If you believe bribery or corruption is being suggested, or you are aware of a situation that might create a perception of bribery or corruption, tell your manager or your Legal or Compliance partner immediately. If something does not feel right, speak up and share your concerns, even if you are not completely sure there is a problem. We will not tolerate retaliation against anyone for reporting concerns in good faith.
- For any payments made to third parties:
 - We make the payments only through approved AstraZeneca financial payment systems, such as bank transfer (to a legitimate business account), cheque, or company credit card. We never make “offshore” payments to an account in a foreign country.
 - We record the payments accurately in AstraZeneca's books and records.
 - We do not pay cash or cash equivalents (such as gift cards), except where approved by above market Finance.
 - We do not make donations to charitable organisations in place of paying directly for goods or services.
 - A third party may make payments on our behalf if (i) we have a genuine business need for them to do so and (ii) our written agreement requires the third party to document, track, and report to us all such payments.
- Where legally required or officially authorised, we make payments (for taxes, permits, licences, inspections, or other official fees, for example) to government agencies. We make the payments to the government agency, not to an individual public official. We ask for and keep official government receipts for those payments.
- We do not make facilitation payments (unofficial or “grease” payments to speed up actions or decisions a public official has a duty to perform), unless you reasonably fear for your (or another person's) imminent safety and feel you have no other safe option.
 - If someone requests or demands a facilitation payment, tell your manager about the situation as soon as possible, and follow up promptly with a written report to your manager (whether or not you made the payment).

- Managers, promptly inform your Legal partner of the situation in writing, and make sure any payment made is recorded in AstraZeneca's books and records. Your Legal partner will help you take any other needed action, such as reporting to authorities.
- AstraZeneca may give money or non-financial support to political parties or candidates or participate in political activities (such as lobbying or political fundraising).
 - We only give political support or participate in political activities if authorised by Government Affairs and approved by CP
 - AstraZeneca gives political support directly to the recipient organisation or individual.
 - When giving political support or participating in political activities in a personal capacity (not on behalf of AstraZeneca), we never suggest that we represent AstraZeneca, and we disclose any potential conflicts of interest in writing to our line manager.