

Document Type	Status	Version	Pages
Procedure	Effective	9	1 to 4
Title of SOP: Government Interactions			

SOP: Government Interactions

AstraZeneca – India

Policy Owners: All Functional Heads of Department

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Revision History

Version number	Valid from	Modified sections
9.0	1 st May 2023	Page 3 – changed “where locally allowed” to “this SOP” to avoid confusion
8	15th June 2021	- Page 2: Revision History column added for ease of reference - No further changes to Government Interactions SOP Version 7. Approval sought to comply with re-approval timelines and avoid expiry of the SOP



SOP Government Interactions

KEY PRINCIPLES

- We act ethically and transparently in our dealings with government officials and other representatives, as with anyone with whom we do business.
- We ask for and keep official receipts for any payments we make to the government on behalf of AZ.
- We do not give gifts to public officials or other government representatives and encourage them to follow their employers' requirements related to accepting hospitality or compensation.

WHY IT MATTERS

We recognise the need for dialogue with government organisations, public officials, and other government representatives (collectively, "government") when it comes to our medicines and broader business activities. Whether we interact with the government or anyone else, we work honestly and transparently. Following applicable laws, we operate in the best interest of AstraZeneca.

Working with the government the right way helps us preserve public confidence that we are a trusted source of medicines, that we do not buy business, and that we operate ethically and sustainably. When we interact with the government, we make sure our motives are clear and above suspicion.

Use this standard, along with our values and behaviours and your own good judgment, to help you make the best decisions about government interactions.

WHAT YOU NEED TO KNOW

Government. "Government" include all Government, Semi Government, Quasi Government, Autonomous body funded directly or indirectly by Government (State or Central including SGPGI, AIIMS or other govt. funded research institutions) and Public sector Enterprises, Hospitals, including NALCO, BHEL, SAIL etc.

INTERACTING WITH THE GOVERNMENT

What is it?

We interact with the government in several ways, always in line with this SOP and appropriate. For example, we follow government regulations to keep our licence to operate, and government organisations are often our customers.

Why and How We Do It

Our interactions with the government are no different from our interactions with anyone else: We act transparently and honestly and make ethical decisions, and we do not support or encourage the unethical activities of others.

- We make payments to the government that are legally required or officially authorised (for example, to pay taxes, permits, licences, and inspection or other official fees), and 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).
 - If someone demanding a facilitation payment causes you to reasonably fear for your (or others’) personal safety, promptly report the situation in writing to your manager (regardless of whether you made the payment).
 - Managers, inform Legal and Finance of the situation and make sure any payment is recorded. Your Legal partner will help you take any other needed action, such as reporting to authorities.
- When we need outside services, we may engage individual public officials when they are the best qualified to provide the expertise to meet AstraZeneca needs. (See *Engaging Third Parties SOP*.) We use our approved contract templates, which remind them that we expect them to follow their employer’s policies covering outside work, including disclosure obligations.
- We document our interactions with public officials and other government representatives. We follow our *Items of Value and Hospitality SOP* and encourage them to follow their employers’ requirements related to accepting hospitality or compensation for services. We do not give gifts of any kind to public officials or government representatives.
- Only those who are specifically authorised to do so may participate in political activities on behalf of AstraZeneca.