



## **Anti-bribery and Anti-corruption Principles for Third Parties**

**Third Parties<sup>1</sup> must not engage in any activity that violates Anti-bribery/Anti-corruption laws<sup>2</sup>.**

### **1 General Principles**

- (a) Third Parties are required to implement and maintain internal policies and procedures that prohibit, and are reasonably designed to prevent, detect, and investigate alleged or suspected violations of anti-bribery and corruption laws. Such policies and procedures must specifically prohibit Facilitation Payments<sup>3</sup>.
- (b) Third Parties must conduct all interactions, transactions, and activities for or on behalf of Mundipharma in a legal and ethical manner, and only for legitimate business purposes.
- (c) Third Parties must record payments and transactions made in connection with services performed for or on behalf of Mundipharma accurately and in reasonable detail in the Third Party's books, accounts, and records.
- (d) Third Parties must immediately report suspected or confirmed violations of the principles contained in this document. Reports should be made to the applicable Mundipharma Representative, or the Mundipharma Integrity Line.

### **2 Working with Government Officials<sup>4</sup>**

- (a) Third Parties who are authorised to do so in writing by Mundipharma may interact with Government Officials for or on Mundipharma's behalf and must do so only for legitimate and necessary business reasons. All dealings with Government Officials must only:
  - i) Utilise official channels of communication, such as government-authorised email addresses and telephone numbers, and where available, online services; and
  - ii) Be with the relevant Government Official assigned to the matter concerning Mundipharma and follow the appropriate chain of command.
- (b) Third Parties must not:

---

<sup>1</sup> **Third Party/Parties** are individuals or entities that Mundipharma engages or enters into an engagement with for the provision of goods and/or services, including but not limited to suppliers, and distributors and their employees, other contracted workers, subsidiaries and third parties.

<sup>2</sup> **Anti-Bribery/Anti-corruption Laws** means all Applicable Laws addressing public corruption or commercial bribery, such as the U.S. Foreign Corrupt Practices Act 1977, the UK Anti-Bribery Act 2010, the Foreign Extortion Prevention Act, and laws in place in the relevant country or place where the services are being performed and/or where the applicable Third Party is domiciled, registered and/or legally established.

<sup>3</sup> **Facilitation Payments** are payments made to induce Government Officials to perform or expedite routine functions that they are otherwise required to perform.

<sup>4</sup> **Government Official** refers to any of the following: 1) an officer, employee, agent or representative of any Government Authority, or any political party, political party official or candidate for political office; 2) an official or employee of a public international organisation (such as the World Health Organisation, United Nations or similar); 3) any person acting in an official or unofficial capacity for or on behalf of a government entity, department, agency, or an organisation that works for a government, or a public international organisation; or 4) family members and individuals generally known to be a close associate of the Government Official.

- i) Solicit or accept Gifts<sup>5</sup>, Entertainment<sup>6</sup> or any other items of value from Government Officials, or someone reasonably appearing or believed to be acting on their behalf; or
  - ii) Offer, promise, agree to give, or give gifts, entertainment, or other items of value or favours to Government Officials, or to former Government Officials who still have the ability to influence decisions that can affect Mundipharma, or to someone reasonably appearing or believed to be acting on behalf of a Government Official; or
  - iii) Engage Government Officials (including individuals who held a Government Official position within the previous 12 months or longer time period specified in Applicable Laws) as paid or unpaid consultants or service providers.
- (c) Third Parties may provide or receive infrequent Hospitality<sup>7</sup> to or from Government Officials where it is:
  - i) Modest in appearance and reasonable in cost;
  - ii) Provided infrequently;
  - iii) Not prohibited by law, regulation, industry code or the internal policies of the recipient's employer;
  - iv) Not intended to or likely to have the effect or appearance of improperly influencing an official decision or action;
  - v) Part of legitimate and necessary interactions with the Government Official; and
  - vi) Accurately and promptly recorded in the Third Party's books and records.

### 3 Working with non-Government Officials

- (a) Third Parties may provide or receive gifts, entertainment, Hospitality or any other items of value to or from private sector individuals or entities where they are:
  - i) Given or received freely (i.e., not at the request or demand by the intended recipient or someone acting on their behalf);
  - ii) Modest in appearance and reasonable in cost;
  - iii) Given or received infrequently;
  - iv) Not prohibited by Applicable Laws or the internal policies of the giving or receiving parties' employers;
  - v) Given or received in connection with a legitimate business relationship;
  - vi) Accurately and promptly recorded in the Third Party's books and records; and
  - vii) Not offered, promised, or given in a time period that is so close to a decision or action by the recipient that it could have the effect or appearance of improperly influencing that decision or action.

### 4 Anti-Money Laundering

- (a) Third Parties must take appropriate measures to prevent, detect and investigate money laundering (the process by which funds obtained from criminal activities are disguised to appear legitimate), including ensuring that:
  - i) Payments to an External Party<sup>8</sup> are only made for legitimate and documented reasons;

---

<sup>5</sup> **Gifts** are items provided directly or indirectly to a recipient, that have a personal benefit, such as watches, jewellery, clothing, Entertainment tickets, or personal services.

<sup>6</sup> **Entertainment** refers to an event, performance or activity designed primarily for amusement, such as sports or cultural events, city tours, musical or theatrical performances, etc.

<sup>7</sup> **Hospitality** includes food, beverages (including meals or Snacks), travel, and/or accommodation. Snacks refer to a small serving of food and/or beverages (e.g., pastry, coffee, tea, fruits, sandwiches, salad, or other similar snacks or light meals).

<sup>8</sup> **External Party/Parties** is a Third Party or other entity that is not directly associated with Mundipharma, or an individual who is not a Mundipharma Representative, that Mundipharma interacts with, such as customers, HCPs, HCOs, Government Authorities and/or Government Officials.

- ii) The External Party receiving a payment is a legitimate entity that is legally established in the country in which the payment is being made;
- iii) The bank account to be paid is the bank account of the intended recipient; and
- iv) The payment is being made in the country where the External Party resides or is legally established and performing the relevant services, and in the respective currency.