



GLOBAL POLICY FRAMEWORK (GPF)

AZ STANDARD - ANTI-BRIBERY & ANTI-CORRUPTION (ABAC) (ENGLISH)

KEY PRINCIPLES

- ***We do not tolerate bribery and corruption, even if it means losing business.***
- ***Bribery involves using something of value to improperly influence someone; value includes more than just money.***
- ***Bribery risk exists not just with public officials but also in our business dealings with other third parties including our customers.***
- ***We do not give or accept bribes, and we do not allow third parties to do so on our behalf.***
- ***Follow the spirit as well as the letter of this Standard.***

1. WHY IT MATTERS AND TO WHOM

This AstraZeneca (AZ) Standard sets out the mandatory Anti-Bribery & Anti-Corruption (ABAC) principles which are central to Our Interactions, aligned to the Global Policy Framework (GPF), and supported by AZ's **Code of Ethics**.

Bribery and corruption can happen anywhere and in any company. For AZ, 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 other business activities 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 Code of Ethics, bribery and corruption are harmful to society by diverting resources, often from the most vulnerable. Bribery and corruption are often linked to other criminal misconduct including money laundering or anti-competitive behaviour.

Use the principles in this Standard, along with our values and behaviours and your own good judgment, to help you make ethical decisions when you interact with others. We all have an obligation to pay attention to any potential warning signs for bribery and corruption, to refuse to tolerate it in any form, and to speak up even if we are not absolutely certain there is a problem. AZ does not tolerate retaliation against anyone who reports concerns in good faith.

The requirements in this Standard are underpinned by applicable anti-bribery/anti-corruption and anti-money laundering laws globally. Any violation of this Standard will lead to disciplinary consequences and may result in termination of employment. Breaches can also create potential legal and regulatory consequences for our company and/or you.

This Standard outlines our key anti-bribery and anti-corruption principles and is complemented by additional Global Standards and local requirements that provide more detail on how we protect ourselves and the company against bribery and corruption risks in various aspects of our daily work. Undisclosed conflicts of interest can create or increase these risks, including the perception of bribery or corruption. AZ periodically provides local and/or global-level anti-bribery and anti-corruption training to employees. Additionally, AZ regularly monitors and audits compliance with this Standard.

2. WHAT YOU NEED TO KNOW AND WHY

Corruption is dishonest, fraudulent, or otherwise unethical or illegal conduct by a person in a position of power or public trust (such as a public official) based on improper influence. Typically, it is an abuse of power or public trust for individual or personal gain.

Bribery is a common form of corruption. Bribery means offering, promising or giving, or requesting, agreeing to receive or accepting, something of value - whether directly or indirectly - to improperly influence the judgment or conduct of the intended recipient or beneficiary.

Typically, a natural person (an individual) is the intended recipient or beneficiary of a bribe. However, in some countries or markets, a legal person is also legally considered capable of being bribed (for example, an institution such as a hospital or other medical facility). Bribery risk exists in our interactions with public officials and also 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. A bribe is still a bribe even if it is offered, promised or given by (or through) a third party acting on AZ's behalf.

Something of value (or things of value) includes anything that could benefit or advantage someone else, financially or otherwise. For example, it could be cash, cash equivalents (such as gift cards), compensation above market value, presents or gifts, cryptocurrency, or other things like meals or other hospitality, financial support (such as charitable contributions or donations, sponsorships or grants), business tools or services, access to resources or information, the award of a contract or an offer of employment, or even personal favours.

Improper influence. Influence is simply an effort to persuade. For example, we compliantly inform HCPs about the safety and efficacy of our products and independent medical standards to encourage the best treatment decisions for patients. However, influence is improper when 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.

A public official. An individual who:

- holds any legislative, administrative or judicial position (whether elected or appointed) on behalf of any country, territory or sub-division (whether domestic or foreign) and at any level (whether local/municipal, provincial, regional, national or other); or
- exercises any public function for or on behalf of any country, territory or sub-division (whether domestic or foreign), or for any government department, public agency or public enterprise; or
- is an official, employee or agent of any public international organisation (for example, the United Nations or the World Bank or the World Health Organisation).

Note: In many countries, depending on the particular context and circumstances - including if they are employed by state-owned hospitals - Healthcare Professionals (HCPs) may fall within this definition of "public official".

3. REQUIREMENTS

3.1 Illustrative Do's and Don'ts

3.1.1 Applying AZ's Values - How We Conduct Our Business

The following section of this Standard provides a few examples of Do's and Don'ts. When in doubt, seek advice from your line manager and/or your Compliance Business Partner.

- We conduct our business fairly and ethically and do not look for or accept any unlawful, or dishonest, business or personal advantage.
- Whether directly or indirectly, we do not
 - Give, offer, or promise a bribe;
 - Request, agree to receive or accept a bribe; or
 - Authorise anyone else to do so, 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 regulatory approval, a licence for a new AZ product or new product indication, a travel visa, a fire safety inspection certificate, a customs clearance or a construction permit);
 - To induce or reward any action or inaction favourable to AZ (for example, granting formulary status for a product or award of a tender, or declining to grant or award those benefits to a competitor of AZ);
 - To compromise or influence any individual's independent judgment (for example, prescription of one of our products for a patient); or
 - To obtain or retain business or to secure an improper business or personal advantage (for example, access to confidential information as part of a competitive bidding process).
- We often exchange things of value with other parties as part of our normal business. Ensure you comply with our Global Standards and local procedures to 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 that the meal is modest; or when we engage an HCP for a speaker meeting or to sit on an AZ advisory board, we ensure that there is a legitimate business need for the relevant engagement or meeting/board and a written agreement in place defining an approved scope for the relevant engagement (or interaction) with a fair market value fee. All such engagements and interactions must be properly documented and monitored, especially when they involve public officials. Our requirements help to avoid even the perception that the meal or engagement is intended to, or *could*, improperly influence decisions or actions.
- The pharmaceutical sector is a dynamic and rapidly evolving business environment. Risk assessments, due diligence and monitoring in relation to bribery and corruption risks are essential for both routine activities as well as more novel or technologically innovative activities (such as e-commerce, digital interactions, telemedicine and diagnosis support, and collaborations or alliance partnerships with start-up entities, etc.).

- AZ provides various methods by which ethical concerns may be raised confidentially (including our AZ Ethics facility and our Global Compliance email account). If you believe bribery or corruption is being suggested, or you are aware of a situation that might create even that perception, tell your manager or your Legal or Compliance Business Partner immediately or raise a concern (for example, via our AZ Ethics facility or our Global Compliance email account). 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.
- Third parties engaged by AZ are required to undergo proportionate and risk-based assessment/due diligence in relation to bribery and corruption risks, and their activities must also be monitored throughout the engagement. For any payments made to (or through) third parties by AZ:
 - We make payments only through approved AZ financial payment systems, such as bank transfer (to a legitimate business account), cheque or company credit card. We record payments accurately in AZ's books and records, and we consistently apply AZ's internal controls (such as Delegation of Authority financial approval limits).
 - We do not pay cash or cash equivalents (such as gift cards), except where pre-approved in writing by Global Finance.¹
 - We do not make donations or contributions to charitable organisations in place of paying directly for goods or services; and we do not attach commercial (sales-related or marketing-related) conditions to our arm's-length charitable donations or contributions.
 - A third party may make payments on our behalf if (i) we have a genuine and compliant 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 to government agencies (for example, for taxes, permits, licences, inspections, or other official fees). We only make the payments to the relevant government agency, not to an individual public official. We ask for and keep official government receipts for those payments.
- In order to keep accurate books and records, and to adhere consistently to our internal controls, we only use AZ-approved digital tools and applications for internal and external work-related communications and interactions. Examples include MS Teams, AZ email, AZ China Corporate WeChat and Veeva systems. This requirement applies whether you are using a personal device or an AZ corporate device. 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 are placed under such duress that you reasonably fear that you (or another person) face an imminent threat of loss of life, physical harm or unlawful detention and you feel you have no other safe option.

¹ We do allow minor cash payments for services in limited circumstances - for example, a business-related taxi journey where an AZ corporate credit card is not accepted or similar legitimate business expense situations where a credit transaction is not available - provided that you obtain a valid contemporaneous written receipt and the relevant transaction complies with all applicable AZ procedural documentation (including this Standard).

- 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 or Compliance Business Partner of the situation in writing, and make sure any payment made is accurately recorded in AZ's books and records. Your Legal or Compliance Business Partner will help you take any other needed action, such as reporting to authorities.
- Where allowed under applicable law and AZ policy, AZ may give money or non-financial support to political parties or participate in political activities (such as lobbying or political fundraising).
 - We only give political support or participate in political activities if pre-authorized in writing by Government Affairs, and we strictly comply with all applicable global and local laws and AZ procedures.
 - AZ gives political support directly to the relevant recipient organisation and always with a full record of the relevant transaction.
 - When giving political support or participating in political activities in a personal capacity (not on behalf of AZ), we never suggest that we represent AZ, and we disclose any potential conflicts of interest in writing to our line manager.