



GLOBAL POLICY FRAMEWORK (GPF) AZ STANDARD - ANTI-FRAUD (ENGLISH)

KEY PRINCIPLES

- ***We do not tolerate fraud in any form.***
- ***We take all reasonable measures to prevent persons associated with AZ from committing fraud and AZ from becoming a victim of fraud.***
- ***We speak up if we suspect fraud is being suggested or has been committed.***
- ***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 principles underpinning our anti-fraud control framework and is aligned to AZ's Code of Ethics and Global Policy Framework (GPF) - Our Interactions. Measures to prevent fraud are included throughout our GPF policy documents, our Financial Controls Framework and other control procedures across AZ. For links to our key fraud prevention policy documents, see 'References' in Section 5 below.

We do not tolerate fraud in any form. Fraud can happen anywhere and in any organisation. We must be aware of the risk of fraud not only when we sell and market our products, but also when we conduct other activities around the world.

AZ may itself become a victim of fraud. However, we must also have reasonable procedures in place designed to prevent persons acting on our behalf - such as our employees, subsidiaries and third-party vendors - from committing fraud for the benefit of AZ and/or our customers/clients. Having and maintaining reasonable fraud prevention procedures helps to protect AZ corporately.

In addition to being illegal and against our Code of Ethics, fraud is harmful to society. Organisations which have engaged in fraudulent misconduct might inflate healthcare product prices, reduce the quality of their products, or harm victims such as national healthcare systems, tax revenue authorities, investors or patients. Fraud is often linked to other criminal misconduct such as money laundering, facilitation of tax evasion, and bribery and corruption.

Use this Standard and other AZ standards, along with our Values and Behaviours, to help you make the best decisions as you interact with others. AZ's reputation relies upon you recognising fraud-related warning signs, refusing to tolerate fraud and speaking up to report concerns about suspected fraud.

The requirements in this Standard are underpinned by applicable anti-fraud 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. AZ periodically provides local and/or global-level anti-fraud training to employees. Additionally, AZ regularly monitors and audits compliance with this Standard.

2. WHAT YOU NEED TO KNOW AND WHY

What is fraud?

Fraud: any activity relying on deception or intentional omission in order to achieve a gain or benefit for oneself and/or another person, which typically also involves harm, loss or risk of loss to others.¹

Broadly, a common fraud scenario may involve a false representation, a failure to disclose relevant information or an abuse of position to achieve a gain or benefit for AZ or our customers/clients (directly or indirectly) which may also involve harm, loss or risk of loss to others.

For example - if you, as an AZ employee, knowingly misrepresent to anyone an issue or position (whether by deception or intentional omission) intending to benefit AZ or our customers/clients and/or for yourself, then that would constitute fraud, and you would be in breach of this Standard.

You may also potentially render AZ and/or yourself criminally liable for your fraudulent misconduct under applicable laws.

Outward fraud: Any fraud committed by an AZ associated person upon others, with an intention to benefit AZ or our customers/clients (whether directly or indirectly). We have in place, and we maintain, reasonable procedures designed to prevent outward fraud.

Inward fraud: Any fraud committed against AZ by anyone, where AZ is the intended victim of that fraud. We also have reasonable measures in place designed to prevent AZ becoming a victim of fraud.

AZ associated person: Any person acting for or on behalf of AZ (including but not limited to our employees, directors and officers, subsidiaries and third parties such as vendors or agents).

3. REQUIREMENTS

We conduct our business fairly and legally, and we do not look for or accept any unethical, unlawful, or dishonest business or personal advantage.

Whether directly or indirectly, we do not:

- Commit fraud (whether inward or outward fraud); or
- Authorise, encourage, assist, counsel or procure anyone else to commit fraud on our behalf or for our benefit, including third parties with whom we work.

As AZ employees, we help to protect AZ from either committing fraud or becoming a victim of it by:

- Undertaking any fraud-related training sessions assigned to us to learn how to prevent fraud and to stay updated on best practices.
- Carefully reviewing any submissions, reports, data or other documentation that we prepare or review for AZ to ensure they are accurate and trustworthy.

¹ Examples of potential fraud include: knowingly submitting falsified documentation to support an expense claim for payment or reimbursement; falsifying medical records to secure government reimbursement or an insurance payment from an insurer; intentionally mis-stating financial or non-financial data (for example, to evade taxation); or deliberately misrepresenting corporate reporting information to external stakeholders (such as investors, regulators or stock exchanges).

- Working with AZ audit and assurance teams to find and fix any fraud risks.
- Using AZ's reporting processes (such as AZ Ethics or escalation to line management and the relevant Compliance Business Partner) to report any suspicious activity or transactions indicating potentially fraudulent behaviour.
- Complying with AZ requirements about segregation of duties, approval levels and delegation of authority.
- Making sure financial transactions are within AZ's set limits and follow the correct AZ approval procedures.
- Diligently monitoring activities, transactions and interactions with which we are involved for AZ to detect any fraudulent behaviour promptly.
- Using AZ's risk assessment and due diligence procedures to check the background and legitimacy of third parties and transactions before engaging with them.

Additionally, for anyone in a management role at AZ:

- Review all approval requests, 3rd-party engagements and transactions for which you are accountable or are asked to approve to ensure they have a legitimate business purpose, align with fair market value and comply with relevant company policies.
- Regularly monitor and apply supervisory oversight to the activities of your direct reports to ensure they are acting compliantly.
- Ensure you stay within your delegated financial authority limits and likewise check that your direct reports also do not exceed their authority.
- Carefully review any submission, report, data or other documentation you are asked to approve, especially if it will be shared externally (e.g., with a regulator, tax authorities, healthcare institutions, government agencies or ministries, the media, patients, investors, etc.).
- Encourage any AZ employees/teams for whom you are accountable to undertake any assigned fraud prevention training and to speak up if they suspect or encounter fraud in any form (using the reporting mechanisms detailed in Section 3.2 below).

3.1 Management of Fraud Risk: Our Approach

We robustly and pro-actively manage our fraud risk. Our corporate fraud prevention procedures and requirements include but are not limited to:

- Communicating our expectations regarding fraud risks to our associated persons (such as our employees and vendors) and encouraging reporting of potential policy violations.
- Ensuring top-level commitment to our anti-fraud controls framework and periodically reporting on the effectiveness of our fraud prevention programme to the Board Audit Committee.
- Maintaining and periodically refreshing our corporate Fraud Prevention Plan and enterprise-level Fraud Risk Assessment.
- Having in place, and periodically reviewing, reasonable procedures to prevent fraud risks and to maintain, monitor and test fraud-related controls.

- Performing risk-based and proportionate risk assessment/due diligence to detect fraud risks in relation to AZ associated persons (including to mitigate the risk of them committing outward fraud for our benefit).
- Applying financial and non-financial controls to ensure accurate accounting and reporting of financial and non-financial performance (including corporate filings to tax authorities, regulators and external auditors).
- Requiring accurate performance and reporting of clinical trials, scientific results and regulatory submissions, sustainability performance, and product quality conformance.
- Maintaining an enterprise-level Fraud Risk Assessment that summarises AZ's potential fraud risks and corporate anti-fraud controls, in relation both to inward and outward fraud.
- Implementing periodic employee training and communications that may include fraud-related content.
- Utilising monitoring and review processes for detecting, mitigating and reporting fraud risks (including audit and assurance procedures, systems and controls).
- Providing a confidential facility for reporting ethical concerns or alleged misconduct (including any type of fraud), together with internal investigation teams that assess and investigate any such reported concerns.
- Monitoring and periodically testing our fraud-related controls to ensure they remain effective, including through independent assurance/auditing from AZ's second and third lines of defence and, where required, obtaining external assurance reviews/audits.

Fraud risk can arise across any of the diverse activities, transactions and interactions undertaken by AZ and our associated persons. The pharmaceutical sector is a dynamic and rapidly evolving business environment. Risk assessments, due diligence and monitoring in relation to fraud 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.).

3.2 Speak Up

AZ provides various methods by which ethical concerns may be raised confidentially (including our AZ Ethics facility and 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.

If you believe fraud is being either proposed or overlooked, or you are aware of a situation that might create a fraud or you believe a fraud may have occurred, tell your manager or your Legal or Compliance Business Partner immediately. They are available to provide support and ensure adherence to our anti-fraud policies and procedures.

Alternatively, for further guidance or to report any concerns, please refer to AZ Ethics, our confidential facility for reporting ethical concerns. See 'References' in Section 5 below.