



Delta Pharma-AL
Anti-bribery Policy

Version: 03

Effective date: 03.12.2020



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1. Purpose

The purpose of Anti-bribery policy is to state that bribery is not allowed. The policy sets the rules and principles on how it must be implemented.

In this policy are treated different aspects and how corruption can be presented and the relation with applicable laws.

It is applicable to all DELTA PHARMA-AL employees and their collaborators.

2. Principles, rules and definitions

2.1 Basic principle

Bribery is defined as giving or receiving an improper benefit for the purpose of influencing one's behavior to gain a commercial advantage.

Bribery does not necessarily involve genuine payment but can take many other forms such as: gifts, extravagance on business trips, or securing tickets to various events.

Partners should not give bribes and should not use intermediaries such as agents, consultants, advisors, or other distributors to commit corrupt acts.

2.2 Gifts, Hospitality and Fun Activities

Gifts are benefits of various kinds which are given to someone as a sign of appreciation or friendship but not with the intention of expecting something in return. This may include "courtesy gifts" that can be given at various occasions such as weddings or funerals, or at specific times of the year (religious holiday, New Year).

Hospitality generally includes accommodation as well as the provision of drinks or food.

Entertainment activities generally include attending sporting events, theater or concerts.

Company staff may not offer, or accept from third parties' gifts, hospitality, reward, benefits or other incentives which may affect the impartiality of the parties, influence business decisions or lead to inadequate performance of an official duty. Also, they cannot offer or accept donations in monetary value.

Company employees can offer and accept gifts and reasonable entertainment activities such as lunch or dinner in cases where it is considered reasonable.



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To determine what is considered reasonable, employees should consider the value of the gift or benefit (see below), as well as the frequency with which that gift is being offered. In all cases, they must ensure that the gift or benefit:

- It is given as an expression of goodwill and not in anticipation of favors (if a gift is given with the intention of expecting a favor in return).
- It is in accordance with acceptable standards of hospitality considering professional norms.

If employees are unsure whether it is considered corruption, please consult your manager.

2.3 Grants and donations

Grants and donations are benefits provided by the company, or by the Marketing Authorization Holders through our company, in the form of contributions (such as donation of free or lower priced drugs).

The Marketing Authorization Holder and DELTA PHARMA-AL can donate grants and donations for various reasons such as research funding, charity projects, etc.

The difference between grants and donations is that grants are given for a specific purpose: e.g. scientific research, while donations are given for humanitarian aid in case of natural disasters (earthquakes, floods, etc.).

These donations can only be made if the Distributor or MAH does not receive or claim to receive anything in return or to influence the Marketing Authorization.

2.4 Government officials

It is the policy of DELTA PHARMA-AL to carry out all activities in accordance with the anti-corruption laws and anti-corruption policies of the partners which prohibit the promise, provision or authorization to give material goods or money to government officials.

Bribery or bribery of a government official can be accompanied by very heavy penalties and can also be accompanied by tarnishing the image of our company, so you should always keep in mind that corruption is prohibited.

By government officials we can understand:

- an elected or appointed Government official (eg MP or member of government)
- an employee or individual who works for or on behalf of a government official (eg a health care worker employed by a public hospital)



- member of a political party, candidate for government official, or employee / individual who works for and on behalf of a political party

Medical staff employed in state hospitals also qualify as government employees and have some more restrictions than staff employed in the private sector. Note, however, that bribery is equally punishable.

The relationship with civil servants must be in accordance with the rules of the institution, as well as in accordance with the requirements of the job profile.

2.5 Political contributions

Contributions to politics mean monetary and non-monetary contributions (eg human resources, making facilities available).

The company has a strict policy to be policy neutral; does not make donations to political parties, organizations or individuals who are engaged in politics, in accordance with applicable law and regulations.

Employees have their right to personal political views, but at no time may they use the company name, premises or equipment to promote these ideas or to promote political ideas as related to the company.

2.6 Facilitation payments

Payments for expediting procedures are payments made to civil servants in order to expedite certain processes, such as giving bribes to speed up customs clearance procedures. These payments are only intended to speed up procedures, not to change the outcome.

DELTA PHARMA-AL, in accordance with the policies of our partners, does not allow these payments to be made under any circumstances.

2.7 Third parties

Third Party means the natural or legal person with whom we DELTA PHARMA-AL interact, who due to the nature of the business may pose a potential risk of corruption. Company Official Partners are not considered Third Parties.

The company should only interact and seek the services of third parties if:

- the request is justified



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- these services are in line with market prices
- if there is a written contract
- whether the benefit of these services is documented

Third Party Involvement should not be used to stimulate or reward healthcare professionals for prescribing our company drugs or to provide inappropriate business advantages.

2.8 Company records and archive

Company records and archives include accounts, sales invoices, financial statements, correspondence, documents, CDs or cassettes, notes or transcribed data of any kind.

DELTA PHARMA-AL must prepare and maintain the registers and archives of the company in such a way as to document in a reasonable and detailed manner the source and use of the assets and income of the company.

Keeping unregistered and unofficial accounts as well as entering false data in company registers are strictly prohibited. All financial transactions must be documented, constantly reviewed and properly accounted for in the company records and archives.

The storage and archiving of financial records and records must be consistent with the policies of our partners as well as the relevant legislation in force.

3. Implementation

All DELTA PHARMA-AL employees should be trained on this policy.

Any employee who is aware of any possible violations of applicable Laws or this policy must report to those responsible, in accordance with the Code of Conduct.

DELTA PHARMA-AL assures all employees that it will maintain confidentiality and will protect employees from any possible counterattack that may come as a result of reporting, within the limits of the law.