

ANTI-BRIBERY & CORRUPTION POLICY



CLIENT-PHARMA CTS

ASSURED GLOBAL SUPPLY

INTRODUCTION

At Client-Pharma Ltd, we value our esteemed reputation and we are committed to conducting our business ethically and honestly in every territory where we do business as well as complying with all applicable laws in those countries. This includes compliance with the Bribery Act 2010.

The purpose of this document is to set out our policy in relation to bribery and corruption. The policy applies strictly to all employees, directors, agents, consultants, and contractors and to any other people or bodies associated with Client-Pharma Ltd. It explains the steps needed to be followed in order to ensure Client-Pharma Ltd maintains its values, adheres to corporate responsibility, society and legal expectations.

For reference purposes, the Company Compliance Officer for Client-Pharma Ltd is the Managing Director.

ANTI-BRIBERY POLICY STATEMENT

The Managing Director, Client-Pharma Ltd has a zero tolerance policy towards bribery and corruption.

Bribery is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical, a breach of trust or the improper performance of a contract.

Corruption is the misuse of public office or power for private gain, or misuse of private power in relation to business outside the realm of government.

Acts of bribery or corruption are designed to influence the individual in the performance of their duty and incline them to act dishonestly. The person being bribed is generally someone who will be able to obtain, retain or direct business. This may involve initiatives such as buying or selling, or it may involve the handling of administrative tasks such as licences, customs, visas or taxes. It does not matter whether the act of bribery is committed before or after the activity has been taken.

Client-Pharma Ltd prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- to or from any person or company wherever located, whether a public official or public body, or a private person or company;

- by any Client-Pharma Ltd Employees for whatever reason;
- in order to gain any commercial, contractual or regulatory advantage for Client-Pharma Ltd in a way, which is unethical, or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

GIFTS AND HOSPITALITY

This policy does not prohibit giving and receiving promotional gifts of low value and normal appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery. We will not provide gifts or hospitality of disproportionate value or with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties. All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our Expenses Policy and the specific reason for the expenditure should be recorded.

For clarification/guidance:

- Disproportionate hospitality is e.g. family holidays, but is not, e.g. corporate healthcare charitable events (UK or international) or sporting events (UK).
- Disproportionate value is e.g. associated with non-charitable events where there is a personal gain greater than £50.
- Proportionate meals and hospitality are no more than once per quarter and cost less than £100 per head.
- Sponsoring people to attend events or meetings and visits to facilities are acceptable if they relate to current Client-Pharma Ltd business.

FACILITATION PAYMENTS AND KICKBACKS

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All Client-Pharma Ltd Employees must avoid activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

DUE DILIGENCE

In order to comply with this policy, Client-Pharma Ltd Employees must carry out appropriate due diligence checks before engaging third parties. It is beneficial to carry out this procedure in respect of any countries where business is conducted so you are aware of any specific risks. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorised and recorded.

ADHERENCE

It may not be easy to make a decision if something is appropriate. If you are in doubt as to whether a potential act is in breach of this policy, the matter should be referred to your MD, the Company Compliance Officer.

REPORTING BRIBERY

You have a duty to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you become aware or suspect that an activity or conduct, which is proposed or has taken place is a bribe or corrupt, you must report it immediately to the MD, the Company Compliance Officer.

You can provide information anonymously if you prefer. In all instances, every effort will be made to ensure that information relating to a reported breach is kept confidential and communicated on a need-to-know basis. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

INVESTIGATION

Client-Pharma Ltd will investigate seriously any actual or suspected breach of this policy, or the spirit of this policy. Employees may be subject to disciplinary action and which may ultimately result in dismissal. In the case of third parties found to be bribing or attempting to bribe Client-Pharma Ltd Employees, they will be informed in writing, business dealings will be ceased and the appropriate authorities will be informed.

MONITORING

The effectiveness of this policy will be regularly reviewed by the Board and will be amended if necessary to ensure it is in line with any legislative changes and any changes in Client-Pharma Ltd activities.

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