



## **ANTI-CORRUPTION AND BRIBERY POLICY**

**(Third Party Suppliers)**

## **1. POLICY STATEMENT**

It is Almac's policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and to implementing and enforcing effective systems to counter bribery.

This Third-Party Anti-Corruption and Bribery Policy (the "Policy") represents the minimum standards that Almac has set. It aligns with the requirements of applicable laws, and suppliers who wish to work with Almac must agree to the terms of this Policy.

## **2. COMPLIANCE WITH ANTI-CORRUPTION AND BRIBERY LAWS**

We take our legal responsibilities very seriously. Almac is bound to comply with the laws of all the places in which it does business, including but not limited to the UK (which includes the Bribery Act 2010) and the US (which includes the Foreign Corrupt Practices Act 1977). Almac may be liable for the third parties we engage to perform services by or on our behalf ("Suppliers") if they act contrary to these laws.

In some cases, local laws and regulations that apply to the activities described in this Policy may be more restrictive than this Policy. Where that is the case, the more restrictive rules must be followed.

## **3. ENSURING COMPLIANCE BY SUPPLIERS**

This Policy applies to any third-party Suppliers who are providing goods and/or services to Almac. Almac is committed to working only with Suppliers who embrace standards of ethical behaviour that are consistent with its own. All Suppliers who receive a copy of this Policy are required to adhere to its principles.

## **4. POLICY AND CONTROLS**

The Board of Directors of Almac has overall responsibility for the effective operation of this Policy, assisted by Almac's Corporate & Legal Affairs team ("Almac Legal"). This Policy is reviewed regularly.

Suppliers (or those acting on their behalf) must not:

- Offer or give, directly or indirectly, money or anything else of value to any person or organisation that is intended to, or could be seen as an attempt to influence or reward them to behave improperly in order to obtain or retain business or secure a business advantage for themselves, their organisation or Almac.
- Request or accept, directly or indirectly, money or anything else of value if it is intended, or could be seen as an attempt, to compromise their independence or judgement, or to improperly influence a business decision for themselves, their organisation or Almac.
- Offer, promise, give, request or agree to receive or accept any gifts, honoraria, or invitations to social and entertainment events on behalf of Almac.
- Offer, promise, give, request or agree to receive or accept any hospitality on behalf of Almac unless it has been specifically agreed in their written service contract or approved in writing by the Board of Directors of Almac.

- Make any charitable, community, academic or political contributions on behalf of Almac, regardless of whether such payments are nominal in amount.
- Allow personal, financial, family or other interests to influence their independence or professional duties and decisions as Suppliers of Almac.
- Give, promise to give, or offer, a payment, gift or hospitality to a government official, politician, political party, agent or representative to "facilitate" or expedite a routine procedure.
- Give, promise to give, or offer, a payment, gift or hospitality to a foreign government official, or any other person, knowing that the payment or promise will be passed on to a foreign government official.
- Accept or make facilitation payments or "kickbacks" of any kind.

## **5. INVESTIGATIONS, PROCEEDINGS AND ONGOING TRAINING**

Suppliers must implement a process whereby incidents are reported to Almac, investigated and recorded quickly and appropriately. Any recommended remedial actions must be fully implemented. If reasonably requested by Almac, Suppliers should update Almac as to the remedial actions taken in response to any incidents of bribery or corruption (or potential incidents of bribery or corruption) which have been identified.

Suppliers must carry out appropriate training in respect of anti-bribery and anti-corruption on an ongoing basis and ensure that those acting on a Supplier's behalf are aware of such Supplier's obligations under this Policy.

Almac will seek to support Suppliers who raise genuine concerns under this Policy, even if they turn out to be mistaken. Almac is committed to ensuring that no-one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place.

We may terminate our working relationship with Suppliers if they breach this Policy.

**If you are unsure whether a particular act constitutes bribery or corruption, or if you have any queries on this Policy, please contact Almac Legal at [commercial.contracts@almacgroup.com](mailto:commercial.contracts@almacgroup.com) and include the subject line *Re: Supplier Anti-Bribery Policy*.**