

**ANTI-BRIBERY  
&  
CORRUPTION POLICY**

Version 1.0

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## **1.0 PURPOSE AND SCOPE**

As a global consulting company, Global Regulatory Partners must comply with the anti-bribery and corruption laws and regulations of every country in which Global Regulatory Partners operates, including the U.S. Foreign Corrupt Practices Act (“FCPA”) and the UK Bribery Act. These standards are minimum standards that apply to all company management, employees and contractors.

## **2.0 ANTI-BRIBERY & CORRUPTION POLICY**

This Policy was created to state Global Regulatory Partners’ zero tolerance approach to bribery and to provide direction to assist in the prevention of bribery and corruption. No officer, employee, agent, joint venture partner, contractor or consultant who work for Global Regulatory Partners may pay, offer or promise to pay, or authorize payment of money, money equivalent, gifts or anything else of value, in any amount, to any person or company whether a public official or private person or company, in order to secure improper performance of duties or functions or, in the case of a public official, with any intention to gain influence for a business advantage in the performance of official functions. A public official is defined as all elected or appointed officials, candidates for political office, consultants with government-owned or controlled companies, officials in political parties or anyone acting on behalf of a public international organization (such as the United Nations).

No officer, employee, joint venture partner, agent, contractor or consultant working for Global Regulatory Partners may receive or solicit to receive payment of money, money equivalent, gifts or anything else of value, in any amount, from any person or company in connection with the performance of services on behalf of Global Regulatory Partners other than the contractually established fee for services rendered and legitimate expenses to be reimbursed in connection with the performance of such services.

### **2.1 Working with Third Parties**

Global Regulatory Partners can be held liable for the actions of third parties who act as intermediaries for and on its behalf in business dealings with customers, government agencies or others. Third Party Intermediaries (“TPIs”) are those who are, or are likely to be viewed as, representatives of Global Regulatory Partners.

As Global Regulatory Partners is accountable for TPI’s behavior, including accepting or giving bribes, the company therefore must make efforts to prevent TPIs from participating in bribery or other corrupt conduct. Any TPI that does business on Global Regulatory Partners’ behalf must conduct business with high level of integrity and should carry out business fairly, honestly, and openly. Global Regulatory Partners will only do business with a TPI who certifies it will act without bribery or other corruption.

## **2.2 Facilitation Payments**

It is Global Regulatory Partners policy not to pay facilitation payments. Facilitation payments are small payments made to low level government officials in order to expedite or secure performance of routine governmental actions over which the official has no discretion, such as permits, licenses, work orders, shipment or inspection.

## **2.3 Gifts & Entertainment and Reimbursement of Travel**

Every Global Regulatory Partners Employee, must comply with the company's Gifts and Entertainment Policy as described in its Standards of Business Conduct.

## **2.4 Promotions and Marketing**

Certain marketing and promotional expenses involving public or private officials may be allowed with appropriate approvals. If public officials will be involved in the receipt of gifts, entertainment or expense reimbursement as part of a promotional activity, you must obtain appropriate approvals from Global Regulatory Partners senior management. Any approved expenses must be paid by Global Regulatory Partners directly to the provider whenever possible, should be directly related to the promotion of Global Regulatory Partners or its services and must be carefully documented. Please refer to the company Standards of Business Conduct for further guidance.

## **3.0 ASKING QUESTIONS AND & REPORTING INCIDENTS OR CONCERNS**

Every Global Regulatory Partners employee, contractor or consultant is encouraged to ask questions regarding this Policy. Every employee contractor or consultant must promptly report any bribe, solicitation or offer of an improper payment or advantage. You may ask questions or make a report to a manager or send an email to Human Resources Department at [ethics@globalregulatorypartners.com](mailto:ethics@globalregulatorypartners.com). Received calls and information will be treated in a confidential manner within the limits of the law.

## **4.0 CONSEQUENCES OF POLICY VIOLATION**

Global Regulatory Partners takes bribery and corruption very seriously. Any employee, contractor or consultant found to be in violation of this Policy will be subject to disciplinary action, up to and including termination of employment. Third parties found in violation of this Policy may be subject to termination of the business relationship with Global Regulatory Partners, as well as any other legal rights and remedial actions available to Global Regulatory Partners.