



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

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## **1. POLICY STATEMENT**

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- 1.1 It is B.P.L.'s policy to conduct all of its affairs in an honest and ethical manner. Our company takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all the business dealings and relationships wherever B.P.L. operates.
- 1.2 B.P.L. will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which the company operates.
- 1.3 The purpose of this policy is to:
- (a) set out the company's responsibilities, and of those working for the company, in observing and upholding B.P.L.'s position on bribery and corruption; and
  - (b) provide information and guidance to those working for the company on how to recognise and deal with bribery and corruption issues.
- 1.4 Bribery and corruption are punishable for individuals and if the company is found to have taken part in corruption the company could face a serious fine, be excluded from tendering for public contracts and face damage to its reputation. The company therefore takes its legal responsibilities very seriously.

## **2. WHO IS COVERED BY THE POLICY?**

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This policy applies to all individuals working at all levels and grades, including all staff, managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, casual associated staff and agency staff, volunteers, interns, agents, or any other person associated with the company.

## **3. WHAT IS BRIBERY?**

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A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

## **4. GIFTS**

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- 4.1 This policy does not prohibit normal and appropriate gift or hospitality (given and received) to or from third parties.
- 4.2 The giving or receipt of gifts is not prohibited, if the following requirements are met:
- (a) it is not made with the intention of influencing a third party to obtain or retain funding or a business advantage, or to reward the provision or

retention of funding or a business advantage, or in explicit or implicit exchange for favours, benefits or funding;

- (b) it complies with local law;
- (c) it is given in the name of the company, not in your name;
- (d) it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- (e) it is appropriate in the circumstances. For example, in Belgium it is customary for small gifts to be given at Christmas time;
- (f) taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- (g) it is given openly, not secretly; and

4.3 The Company appreciates that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

## **5. WHAT IS NOT ACCEPTABLE?**

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It is not acceptable for you (or someone on your behalf) to:

- (a) accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a commercial advantage for them;
- (b) accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a commercial advantage will be provided by the company in return;
- (c) threaten or harass against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- (d) engage in any activity that might lead to a breach of this policy.

## **6. WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION**

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It is important that you inform the company's Chief Operating Officer as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

## **7. PROTECTION**

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7.1 Associated staff who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The company aims to encourage openness and will support anyone

who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

- 7.2 The company is committed to ensuring 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 in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the company's Chief Operating Officer immediately.

## **8. COMMUNICATION**

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- 8.1 Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

## **9. WHO IS RESPONSIBLE FOR THE POLICY?**

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- 9.1 The company's Chief Operating Officer, reporting to the Chief Executive Officer has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy.

## **10. MONITORING AND REVIEW**

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- 10.1 The company's Chief Operating Officer will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.
- 10.2 All associated staff are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.
- 10.3 Associated staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the company's Director Operations & Development, email [frederic.peelman@biopharmalogistics.com](mailto:frederic.peelman@biopharmalogistics.com)
- 10.4 This policy does not form part of any employee's contract of employment and it may be amended at any time.