

ARENSIA Anti-Bribery, Anti-Corruption Policy

1. General Considerations

Corruption has always been and will continue to be a topic to be considered in the context of any business.

Complying with all applicable laws and regulations including anti-bribery and anti-corruption laws, as well as to the highest professional, moral and ethical standards is a core value of ARENSIA Exploratory Medicine. Expectation is that all EMPLOYEES follow the letter and the spirit of these codes of conduct.

Furthermore, because a corporate anti-bribery and anti-corruption policy - as comprehensive as it may be - will never cover all possible activities or take into account all relevant factors, acting at all times according to generally accepted ethical and moral standards is a key requirement when working for or collaborating with ARENSIA Exploratory Medicine.

2. Forms of Bribery

Bribery can be offered, respectively provided, in form of money, valuable goods or services, tickets for air transport or lodging, etc. Bribery can be offered directly or via third parties.

The above is also true if the bribery / corruption is not done personally but if the bribery / corruption is tolerated without taking appropriate actions to prevent it.

3. Target for Active Bribery / Corruption

The target of bribery can be anybody who potentially can provide material or immaterial advantage to the person, company or organization who is the initiator of the bribery or who benefits from bribery (passive corruption).

4. Activities Considered Active Bribery / Corruption

ARENSIA's anti-bribery / anti-corruption regulations prohibit directly or indirectly via a third party to

- Influence any act or decision of government bodies to obtain accelerated approvals of the health authorities or Ethical Committees
- Influence the timelines to receive goods from customs officials
- Influence the custom clearance of goods, e.g. medication, for which the import is restricted, not allowed or require special procedures based on local laws or regulations
- Influence governmental officials to receive tax advantages
- Influence the decision of Investigators to recruit subjects in a clinical trial conducted by ARENSIA
- Influence the decision of a subject to participate in a clinical trial conducted by ARENSIA
- Influence EMPLOYEES, directors or consultants of Sponsor companies to award projects to ARENSIA
- In addition to the above, to offer or provide anything which is prohibited by law or any applicable regulation, or which can be considered unethical or immoral



5. **Activities or Behavior of ARENSIA EMPLOYEES Considered as Passive Corruption / Bribery**

ARENSIA EMPLOYEES must not accept anything described under section 2 above for themselves or their family, which

- can influence the impartiality of their work
- stand in context with the inclusion of a subject in a clinical trial performed by ARENSIA

6. **Good Practice to Avoid Bribery / Corruption**

Acting as outlined below can be considered adequate

- All services should be documented in a written agreement, which should specify the complete compensation package
- Any hospital agreement of which ARENSIA is a party must include representations, warranties and provisions in order to comply with local law and regulations
- Compensation should be fair market value for the services provided
- Performance of services received should be documented before payment is made
- Service provider invoices should have sufficient detail to enable proper record keeping and auditing

7. **Reporting of Suspected Bribery**

Any actual or suspected violations of these guidelines must be reported immediately to ARENSIA General Management or the Corporate QA department.

These reports will be investigated as confidentially as possible; the reporting person (“whistle-blower”) / person investigating such reports under this Policy is assured that no reprisals will be taken as a result of such reporting.

8. **Service Providers / Third Parties**

Third Parties which are contracted by ARENSIA must comply with the ARENSIA anti-bribery policy.

It is the obligation of ARENSIA to inspect / audit the third party in this regard before commencing any collaboration.

9. **Applicable Laws and Regulations**

ARENSIA's anti-bribery and anti-corruption policy is based amongst others on the following documents, whenever applicable for ARENSIA's business:

- <http://www.oecd.org/daf/anti-bribery/41194428.pdf>
- <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:287:0001:0110:EN:PDF>
- <https://wcd.coe.int/ViewDoc.jsp?id=354025&Site=CM&BackColorInternet=C3C3C3&BackColorIntranet=EDB021&BackColorLogged=F5D383>
- <http://www.justice.gov/criminal/fraud/fcpa/statutes/regulations.html>
The US Foreign Corrupt Practices Act (“FCPA”)
- <http://www.legislation.gov.uk/ukpga/2010/23/contents>
The “UK Bribery Act 2010”