Pharma DRA

Regulatory solution provider >>>>

ANTI-BRIBERY & CORRUPTION POLICY

Version 1.1

Pharmaceutical regulatory consultancy in Bangladesh

www.pharmadra.net

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1.0 PURPOSE AND SCOPE

As a global pharmaceutical regulatory consulting company, Pharma DRA must comply with the anti-bribery and corruption laws and regulations of every country in which Pharma DRA operates, including the Anti-Corruption Commission Act, 2004 of the Government of Bangladesh. 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 Pharma DRA's 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 Pharma DRA 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 Pharma DRA 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 Pharma DRA 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

Pharma DRA 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 Pharma DRA.

As Pharma DRA 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 Pharma DRA's behalf must conduct business with high level of integrity and should carry out business fairly, honestly, and openly. Pharma DRA will only do business with a TPI who agrees it will act without bribery or other corruption.

2.2 FACILITATION PAYMENTS

It is Pharma DRA's 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 Pharma DRA 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, one must obtain appropriate approvals from Pharma DRA senior management. Any approved expenses must be paid by Pharma DRA directly to the provider whenever possible, should be directly related to the promotion of Pharma DRA or its services and must be carefully documented. Please refer to the company Standards of Business Conduct for further guidance.

3.0 TRAINING ON ETHICS AND COMPLIANCE

Pharma DRA will conduct training for all employees twice a year. Every employee should complete at least one training on ethics and compliance during his/her provision period.

4.0 ASKING QUESTIONS AND & REPORTING INCIDENTS OR CONCERNS

Every Pharma DRA 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 at +8801813364189 or make a report to Chief consultant of Pharma DRA or send an email to bd@pharmadra.net Received calls and information will be treated in a confidential manner within the limits of the law.

5.0 CONSEQUENCES OF POLICY VIOLATION

Pharma DRA 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 Pharma DRA, as well as any other legal rights and remedial actions available to Pharma DRA.

This is an electronic copy and doesn't require a signature. A controlled copy is preserved by Pharma DRA HQ.