

<u>Policy Name</u>	Company Policy on Anti Corruption and Bribery
<u>Policy issue date</u>	01-01-2020
<u>Policy approver</u>	Ezzat Scandar – VP & Managing Director

COMPANY POLICY ON ANTI- CORRUPTION AND BRIBERY

1. Policy Statement

Soficopharm does not tolerate corruption or bribery in any form. Soficopharm prohibits the offering or payment of bribes, kickbacks or any other improper benefits to actual or potential customers, agents, contractors, distributors, sub-distributors, suppliers, healthcare professionals, government officials, employees of these entities, also employees or agents of a foreign government or foreign government-owned or controlled entity; Officials or candidates for a foreign political party; or Employees or agents of a public international organization, or any other party. Similarly, Soficopharm employees shall not demand, arrange or accept bribes, kickbacks or other improper benefits from any entity for the benefit of the employee or the employee's family, friends, associates or acquaintances, or any other person.

2. Scope of Application

While the requirements of this Policy apply to all Soficopharm entities and employees, they are of particular relevance to those employees that have contacts with actual or potential customers, agents, contractors, suppliers, government officials, and employees of these entities either foreign or local entities.

3. Accountability

The Company's management and all managers are responsible for ensuring that the policy is implemented throughout the organization, as required to adopt, communicate and implement with all applicable laws and regulations, as together we provide "Best-In-Class" service.

The third parties engaged by the Company in the provision of services must also demonstrate their commitment to such compliance.

Violations of the laws on corruption and bribery may have serious consequences both for the company and the individual concerned. The company may be subject to substantial fines and damage claims and offending employees can be subject to substantial fines, imprisonment, or both. Failure to comply with the provisions will also result in disciplinary action for the employee involved, that might up to dismissal from service.

4. Procedures

1- Bribes, Kickbacks and Other Improper Benefits

Soficopharm doesn't allow facilitation payments by any mean and prohibits the following improper business payments and practices.

- a) Payments by or on behalf of Soficopharm which are unlawful under the laws of the country
- b) Offering, giving, demanding or receiving bribes, payoffs, kickbacks, or other improper payments to or from customers, contractors, agents, suppliers or government officials, healthcare professionals, employees of these entities, or any other person or entity; local or foreign.
- c) Payment of dealer rebates or other deviations from normal terms of sale where the business is being conducted, where the payments or deviations would violate the laws of the country.
- d) Payments by or on behalf of Soficopharm with the intention or understanding that a part or all of such payment is to be used for any purpose other than that described by the document supporting the payment.

2- Gifts, Hospitality and Expenses

Gifts or payments in any form to government officials is completely prohibited even if it was in a small value.

NO Employee is permitted to accept for himself or for a third party any gift of any kind under any name (ex. meals, favors, services and entertainment, etc.), In return of the Services that we provide, as we do provide our Services in professional manner and in exchange of the fees that we agreed upon with our clients to provide such Services.

Away from the above mentioned, Gifts, hospitality and expenses offered to or received from employees of customers or suppliers (including prospective customers or suppliers) must meet the following criteria: -

- a) Gifts, hospitality and expenses shall comply with normally accepted business practices in the country, and comply with the policies of the organization employing the recipient.
- b) Gifts, hospitality and expenses can only be offered if they are considered legal and comply with generally acceptable ethical practices in the country. Such gifts, hospitality or expenses must be an ordinary social amenity or normal business sales promotion.
- c) The facts surrounding the gift, hospitality or expenses would not be embarrassing to or otherwise have a negative impact on Soficopharm if disclosed.
- d) Generous expenditure shall be avoided when entertaining an employee of a customer, supplier or prospective customer or supplier.

e) Soficopharm employees shall not accept hospitality, expenses or gifts from customers, suppliers, or prospective customers or suppliers where the cost to the host would appear to be more than is reasonable and customary.

f) Soficopharm employees shall not accept hospitality, expenses or gifts from any customers, suppliers, or prospective customers or suppliers that may unduly influence or prejudice the relationship.

3- Agents

Agents are generally independent organizations or individuals engaged to help the company solicit business for specific products or services.

a) Soficopharm employees shall not channel such payments described in section (4 - 1) or any other improper payments through an agent.

b) Soficopharm may undertake due diligence before appointing an agent.

c) Compensation paid to agents shall be appropriate and justifiable remuneration for legitimate services rendered, and shall not be paid outside of the country where the business is being conducted, where such payments would violate the laws of the country where the business is being conducted.

d) Agency relationships shall be documented.

e) Responsible Soficopharm managers shall monitor the conduct of agents, and should have a contractual right to terminate the relationship in the event an agent has paid bribes.

5. Reporting & Questions

Whenever in doubt about a particular situation, or there is case that need to be reported employees are required to apply the following

- Send an email to soficoph@link.net
- report the case to the internal audit and compliance department
- consult with the manager to which he/she reports or, as necessary, to a manager of higher rank in the organization

Related Policies: Code of Conduct

Policy approved by,

Ezzat Scandar

VP & Managing Director

