

# Lotus Labs Business Partner

## Guide to Anti-Corruption and Anti-Bribery 2015



### Company Overview

Lotus Labs is a Clinical Research Organization with extensive experience in conducting Clinical Trials in healthy volunteers, patient populations and special populations. With the nerve centre at Bangalore, India, Lotus Labs offers an extensive portfolio of services – spanning Phase I to III studies – for global pharmaceutical and biotechnology companies. With a battery of services, from end-to-end Clinical Trials to stand alone services, Lotus Labs has an impressive track record with expertise across all facets of Clinical Research, powered by proficiency in the areas of Bio Studies, Clinical Trials, Bioanalytical Research, Biometrics, Medical Writing and Regulatory Services.

Our leadership in the realm of early to late phase Clinical Development; proven expertise across a broad range of therapeutic areas; and collaborative approach to partnerships both at home and abroad have ensured that Lotus Labs is today the preferred hub of Clinical Research for Indian & International sponsors.

Lotus Labs offers a service portfolio that is truly comprehensive consisting of a range of early and late development studies and one that is characterized by high levels of quality and reliability – powered by experienced professionals and cutting edge technology.



## Lotus Labs Business Partner Guide to Anti-Corruption and Anti-Bribery 2015

As a valued Business Partner, Lotus provides this Guide to ensure:

- 1.** You understand Lotus' commitment to complying with all applicable anti-corruption laws and regulations, and recognize Lotus' expectation that you also comply with these laws and regulations.
- 2.** You are aware of Lotus' Global Anti-Corruption Policy and related compliance practices, so that you can and will adhere to these standards.
- 3.** You understand that Business Partners who violate this Guide, Lotus' Global Anti-Corruption Policy, or applicable laws are subject to termination of all commercial relationships with Lotus.





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### Policy Overview

Throughout its operations, Lotus seeks to avoid even the appearance of impropriety in the actions of its employees, officers, directors, and Business Partners. To achieve this standard, Lotus has implemented a Global Anti-Corruption Policy, which establishes rules, guidelines, and resources for Lotus personnel and Business Partners.

Highlights of this policy, with which you must comply, are provided below:

Lotus prohibits bribes, kickbacks, and other improper payments.

Books and records must be complete, accurate, and transparent.

Lotus expects transparency with HCPs and Government Officials.

Business expenses must be legitimate, reasonable, and appropriate.

- Lotus prohibits bribes, kickbacks, or payments of **Anything of Value** from being offered, given, authorized, or accepted in any way related to Lotus' business, including improper payments to **Government Officials** (including HCPs) or private persons.
- **Facilitation Payments** are prohibited.
- Lotus requires that all transactions be completely and accurately recorded in Lotus' books and records.
- Business Partners must maintain complete, transparent, and accurate records supporting all transactions undertaken on behalf of Lotus, particularly transactions involving **Government Officials** (including HCPs).
- All interactions with HCPs, including funding HCPs to attend congresses or symposia, must comply with the Global Anti-Corruption Policy, local laws and codes of practice, and applicable anti-corruption laws.
- Lotus will ensure that, if required in the relevant jurisdiction, HCPs, government entities, and **Government Officials** engaged by Lotus or who act on Lotus' behalf publicly declare their relationship with Lotus.
- Neither Lotus nor its Business Partners may give or offer gifts, hospitality (i.e., meals, drinks, travel, entertainment), marketing or promotional materials, educational events, or sponsorships of anything of value to improperly influence, induce, or reward any decision.
- Business expenses must have a legitimate business need, be reasonable and appropriate in time and place, and be modest in value and frequency.

### DEFINITIONS

#### Government Official

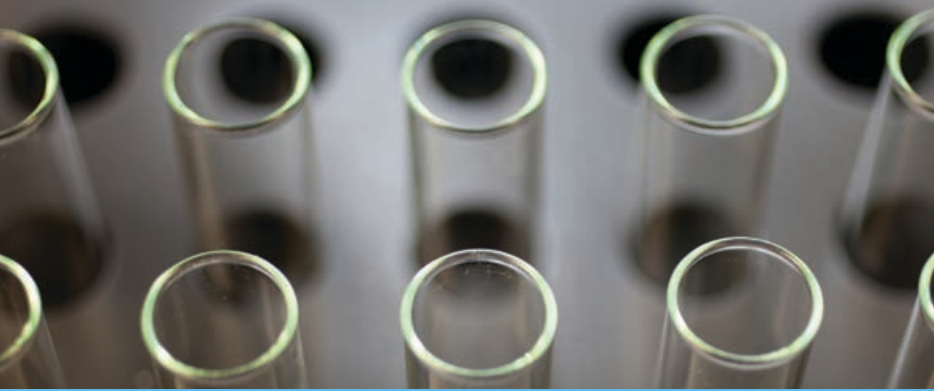
- Individuals who hold a legislative, administrative, or judicial position of any kind at any level (i.e., state, local, national).
- Individuals who exercise a public function for a public agency.
- Personnel at state-owned or controlled enterprises (e.g., state-owned hospitals or pharmacies). Under Lotus' policy, HCPs employed by public or state-owned or controlled hospitals are considered Government Officials.
- Political parties and candidates for political office.
- Employees of international governmental organizations (i.e., World Bank, United Nations).

#### Anything of Value

- Defined broadly as bribes that can be made in the form of both financial and non-financial advantages, such as cash, gift cards, vouchers, gift certificates, discounts, entertainment, travel, educational expenses, employment, etc.

#### Facilitation Payments

- Small, unofficial payments to low-level government officials to secure routine governmental approvals.



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### Steps to Ensure your Compliance

In order to ensure that Lotus' Business Partners meet or exceed our own ethical and legal standards, Lotus undertakes a series of measures related to prospective and current Business Partners. These include, but may not be limited to:

#### Due Diligence & Contract Terms

- Lotus conducts due diligence on its Business Partners to ensure its Business Partners share our commitment to ethical and legal business.
- Lotus requires written agreements and contracts with Business Partners that include appropriate anti-corruption and anti-bribery clauses.

#### Training & Certifications

- Lotus may require Business Partners to attend anti-corruption training (online or live training format).
- Business Partners may be required to certify compliance with the FCPA or other anti-corruption laws.

#### Payments & Commercial Terms

- Payments to Business Partners must be consistent with fair market value, which is determined according to the standards of the relevant country.
- Lotus will not pay cash to Business Partners, other than documented petty cash disbursements.
- Business Partners must maintain supporting documentation for all transactions related to Lotus, which Lotus may request and audit from time to time.

### Applicable Laws & Regulations

Lotus strives to comply with all applicable anti-corruption and anti-bribery laws and regulations, and expects its Business Partners to do the same, including, but not limited to:

- The US Foreign Corrupt Practices Act (FCPA)
- The UK Bribery Act 2010
- Local anti-corruption laws where Lotus or its Business Partners conduct business
- International conventions or treaties

**Under many of these laws, Lotus may be responsible for the activities of its Business Partners.**

Lotus expects its Business Partners to comply with the standards in the FCPA and UK Bribery Act, even if they are not a UK or US person or entity.

### REPORTING NONCOMPLIANCE:

To report actual or suspected violations of this Guide, Lotus' Global Anti-Corruption Policy, or applicable laws, please call **+1-862 261 7444**.

### QUESTIONS OR CONCERNS:

If you have questions about this Guide, Lotus' Global Anti-Corruption Policy, or Lotus' expectations of you as a Business Partner, please contact your Lotus representative or call **+1-862 261 7444**.