



ANTI-CORRUPTION POLICY OF THE HEALTH AND ENVIRONMENTAL SCIENCES INSTITUTE (HESI)

Maintaining a Corruption-Free Culture. HESI is committed to sustaining a culture free from corruption in transactions between government officials and employees and other representatives of HESI. Bribes, loans, and other illicit compensation offered or paid to government officials can subject the individuals and organizations who provide them to very serious civil and criminal penalties, including fines, debarment from government contracting, court supervision, and—for individuals—imprisonment. Moreover, engaging in corrupt practices could severely damage the public trust that organizations such as HESI seek to cultivate through their work in support of global public health.

Statement of HESI Policy.

1. ***Compliance with Applicable Law.*** It is the policy of HESI that each of our trustees, employees, staff, agents, representatives, and other third parties that interact with government officials on behalf of HESI shall comply with the anti-bribery laws of the countries where HESI engages in activities.
2. ***General Prohibition on Bribery.*** Bribery of any kind, in any country, regardless of local custom or practice, is strictly prohibited. For this purpose, “bribery” means the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision. Bribery includes any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.
3. ***Prohibition on Bribery of Officials.*** No HESI trustee, employee, staff, agent, representative, vendor or any other third party with which HESI works shall make any payment or provide anything of value, directly or indirectly, to any official or employee of any government, state-owned enterprise, or international organization (an “Official”), in order to induce such Official to do or omit to do any act in violation of the lawful duty of such official; or to influence that Official to secure any improper advantage for HESI or for HESI’s member companies. This policy includes, but is not limited to, a prohibition on obtaining or retaining business, or directing business to any person or entity.
4. ***Prohibition on Facilitation Payments.*** All HESI trustees, employees, staff, agents, representatives, and other third parties acting on HESI’s behalf are prohibited from making any form of facilitation payments, which are a form of bribery that involves expediting or facilitating the performance of an Official for a routine governmental action.

5. *Prohibition on Use of HESI Assets for Political Purposes.* No HESI funds or in-kind contributions shall be used to make contributions to political parties or candidates for elected office in any country.
6. *Record-Keeping.* It is also the policy of HESI that each of its employees, staff, agents, representatives, vendors and all third parties that work with HESI make and keep books, records, and accounts, which, in reasonable detail, accurately reflect any transactions and dispositions of HESI.
7. *Incidental Expenses and Reimbursements.* To the extent permitted by applicable national and local law, HESI may reimburse travel expenses and provide meals and entertainment to Officials as part of a legitimate HESI business activity, so long as the benefit to the Official remains reasonable. In all such cases, the benefit should be merely incidental to the business purpose and should not be intended or likely to be perceived as an attempt improperly to influence the Official's decision in any matter.

Scope of Policy. Representatives of HESI who are covered by this policy include employees, officers, and agents of companies that are members of HESI when those persons are acting for HESI in a representative capacity. In addition to the civil and criminal fines and penalties imposed by applicable anti-corruption laws, violators of this HESI policy may be subject to disciplinary measures imposed by HESI. Penalties for violations will vary with the circumstances, but may include termination of the offender's relationship with HESI.

Compliance. HESI shall develop training and other educational materials for the individuals covered by this policy to ensure that the policy is fully understood and implemented. HESI's staff in its Washington, DC headquarters shall serve as a clearinghouse for requests for information and clarification by such individuals.