

# Grünenthal Anti Fraud policy

GRUNENTHAL is a corporation that operates under the highest standards of ethics; consequently it is not engaged in any type of corrupt conduct, being the obligation of THE SERVICE PROVIDER to act in a similar way.

The purpose of the Policy herein is to guarantee that the commercial relationship between GRUNENTHAL and THE SERVICE PROVIDER is framed within a procedure that fully honors ethics, morale and good practices standards for business, observing both GRUNENTHAL's internal policies, the local juridical order in force, and international standards on the subject.

For the effects of a better illustration of the aforementioned, we put into THE SERVICE PROVIDER's consideration the following situations that, by way of example and not limitation, are forbidden by GRUNENTHAL:

## **i) Prohibition of bribes, secret commissions, illegal payments and other corrupt practices**

THE SERVICE PROVIDER shall not make use of third parties, agent, attorney, delegate or representative to engage in conducts that are forbidden and rejected by GRUNENTHAL. GRUNENTHAL forbids the following conducts (by way of example and not limitation): to offer, make or authorize the payment in cash or any other valuable in a direct or indirect way, to illegally influence on a commercial, political or governmental decision, or to illegally ensure a desired result or action from any individual, client, corporation or legal representative and, in general, to carry out any action through illegal means.

## **ii) Conflicts of Interest**

A conflict of interests arises when personal interests and activities influence (or seem to influence) the ability to act for the best interest of GRUNENTHAL, THE SERVICE PROVIDER, or both. Situations that constitute conflict of interests are: (by way of example and not limitation):

- To carry out business with relatives<sup>1</sup> of persons that work for GRUNENTHAL, with another supplier of GRUNENTHAL, a client of GRUNENTHAL or its competitor.
- To carry out business with relatives of persons that have an "important financial interest" in another supplier, client or competitor of GRUNENTHAL.
- To have financial interests in other company of the same industry.
- To provide services to the direct competence of GRUNENTHAL with access to confidential information or information of the competence.

## **iii) Anti-Monopoly Conducts:**

GRUNENTHAL believes in and is strongly committed with a philosophy of free and competitive trade. Therefore, it demands from THE SERVICE PROVIDER to likewise comply with all applicable laws and regulations regarding fair competence and anti-monopoly issues.

THE SERVICE PROVIDER commits itself to respect, make respect, observe and comply the above mentioned policies. Likewise, it is THE SERVICE PROVIDER's obligation to immediately inform to GRUNENTHAL's management about any conduct similar to the above mentioned.

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<sup>1</sup> It refers to relatives up to the second degree of consanguinity, inclusive