

ASTRAZENECA GLOBAL POLICY COMMUNICATIONS

1. PURPOSE

The purpose of this Policy is to define the high level requirements for external communications from the Company and ensure that AstraZeneca communication resources are used in a manner that is consistent with the Company's mission and business objectives and is in compliance with applicable laws and regulations, adopted industry codes and related AstraZeneca policies. The Policy also clarifies the obligations employees have regarding their personal use of Digital Media where this is related to their work for AstraZeneca.

2. AUDIENCE

This Policy applies to all employees of AZ and its consolidated legal entities, including all full-time and part-time directors, officers, employees and temporary staff worldwide (collectively referred to as "employees" in this Policy). This Policy also describes specific requirements for AZ business units.

Although third parties are not directly bound by the requirements of this Policy, AZ is committed to engaging only those third parties who embrace standards of ethical behaviour that are consistent with our own. When adherence to this Policy is required (for example, with respect to external agencies acting on our behalf), this will be detailed in the signed contract or other written agreement with the third party.

All employees must bear in mind that in any situation in which you are communicating with the external world, you might be perceived to be (or, in the eyes of the law, deemed to be) communicating on behalf of the Company.

All employees must also bear in mind that their internal communications can be subject to external scrutiny.

This Policy is also supported by global standards and global guidelines. In addition, local marketing companies and other business units have established relevant procedures with more detailed requirements to account for local law and adopted industry codes. Where these relevant procedures are stricter than this Policy and supporting global documents, you must follow the more strict requirements.

You must consider all applicable requirements from this Policy, its supporting global documents and relevant procedures (collectively, "AZ's requirements") to ensure compliance. You must follow the spirit of AZ's requirements, even if a particular topic is not fully addressed. Talk to

your line manager or your Compliance partner if you are ever unclear about any of AZ's requirements.

3. SCOPE

This Policy sets out the Global requirements for all external Company communications.

This document also provides detailed requirements covering Digital Media Communications including but not limited to mobile, web and social media channels.

The document content covers communications about our products, science, pipeline, business, public policy communications, media communications and the use of corporate brands and electronic communications.

4. POLICY STATEMENTS

- 4.1. This Policy applies to all communications that are, or may be deemed or perceived to be, on behalf of the Company, whether written, oral, electronic or hard copy ("Company Communications").
- 4.2. Company Communications include communications with the general public, the media, patients, staff, healthcare professionals and organizations and other customers, investors, governments, non-governmental organizations and other public bodies, stakeholders and third parties.
- 4.3. All Company Communications must be made by an authorized employee or agent and go through the appropriate internal approval procedure.
- 4.4. All Company Communications must be fair, complete, accurate and not misleading, either through inclusion or omission.
- 4.5. All Company Communications must be consistent with any previously approved global position on the subject or issue unless authorized by Corporate Affairs.
- 4.6. All Company Communications that incorporate a Company or product brand, trademark or logo must comply with the appropriate brand and trademark guidelines.
- 4.7. All staff need to be aware that, in certain situations when acting in what you may consider to be a personal capacity, you may be perceived to be or, in the eyes of the law, deemed to be speaking on behalf of the Company (e.g. personal use of a Company computer and email address, discussing the Company's products or personal speaking engagements). These communications are considered Company Communications and the requirements of this Policy apply.
- 4.8. There are only limited circumstances (such as identifying your employer in a personal profile, personal private conversations, personal medical matters and personal reports), in which personal communications that mention the Company, our products, staff, competitors or other third parties would not be considered as Company Communications.

5. APPROVAL OF COMMUNICATIONS

- 5.1. All Company Communications must receive internal approval, as required by applicable global, local, SET area or functional policies or procedures. On occasions when the procedures of two or more functions or locations apply, the stricter procedure must be applied.
- 5.2. Potentially material, non-public information (i.e. that could be considered influential in making a decision to buy or sell securities) must be communicated to the AstraZeneca Disclosure Committee, via the VP of Investor Relations or the Deputy Company Secretary at the Corporate Head Office, for a judgement as to materiality and approval prior to any disclosure.
- 5.3. Confidential information, any information marked or intended only for internal communication or use within the Company, and any other information obtained during the course of employment, must not be disclosed or used in any Company Communication without prior approval, nor in any personal communication.
- 5.4. The Company's intellectual property, including any trademarks, copyrights, or other intellectual property, must not be used in any communications that are unrelated to official Company business without prior approval in accordance with applicable procedures.
- 5.5. All relevant approvals must be sought for speaking engagements, if you are, or may be perceived to be, communicating on behalf of the Company. Scientific, technical and medical communications must receive internal approval as required by applicable global, local or SET area procedures, such as the [Global Publications Policy](#). To communicate on other topics, approval must be obtained from your manager.
- 5.6. If communicating with governmental (regulatory), non-governmental, or other public bodies, ensure that you are authorized to do so.
- 5.7. When employees are taking part in discussions in a public forum and are required to give a personal opinion, they must ensure that any responses provided do not contradict Company statements and do not reflect badly on the Company, and they must make clear that their opinions are their own, not the Company's.
- 5.8. When employees are planning to take part in discussions in a public forum or involved in external speaking engagements, they must consider the potential security risks and consult with Global Security if they have any concerns or questions about such risks.

6. PROVIDING PRODUCT INFORMATION

- 6.1. Specific functions are responsible for providing certain types of Company product information. For example: some communications about the safety and efficacy of our medicines are restricted to functions such as Regulatory and Medical Affairs; the Science Units (R&D) publish scientific data in appropriate ways, and Commercial provides product information to prescribers, using approved communications methods and materials.

- 6.2. These communications are governed by very specific standards and procedures, which you must be aware of and comply with, if they apply to the communication you intend to make. They include the [Global Policy: Ethical Interactions](#) and its supporting Global Standard on Pre-Approval Activities by Commercial Employees, the [Global Standard: Press Releases and Media Material](#) and the [Global Publications Policy](#).
- 6.3. All staff need to be aware that any communication about any Company product, a competitor product or a disease area, or indication for which we have a current or potential product, constitutes a Company Communication, to which this Policy applies.
- 6.4. Except in countries where this is explicitly allowed, online content (including links) must never point patients or the public to promotional material for prescription only materials.
- 6.5. On European brand digital media communications, a full and up to date SMPC (Summary of Product Characteristics) must be available and designated as 'Product Information'.
- 6.6. Any product promotional material published on digital channels must include a URL link to an appropriate repository for the most up to date product label. In the event that a repository is unavailable, and the digital channel embeds product labels on the asset, the asset owner must ensure the embedded product labels are continually kept up to date.
- 6.7. Patient-facing digital communications concerning health or medicines, must include a statement saying "patients must seek advice from their doctors, pharmacists, or other healthcare professionals" or a similar statement to the same effect.
- 6.8. A warning must also be placed in such communications indicating that the information on the site cannot take the place of professional medical advice and that the digital media communication is not intended as a source of medical information for personal health decisions.

7. PUBLIC POLICY COMMUNICATIONS

- 7.1. Communications with governments, nongovernmental organizations and other public bodies to inform or influence public policy are also managed by specific functions, including Government Affairs Regulatory Affairs and the groups accountable for Science Policy in the Science Units, who, in addition to this Policy, must operate to specific standards and procedures.

8. MEDIA COMMUNICATIONS

- 8.1. Communications with or through the media must be conducted by, or with the support of, the designated communications professional in your area.
- 8.2. All requests from the media for information, including interviews, must be referred to and managed by the relevant communications professional.
- 8.3. All press releases and other communications with or through the media relating to products, development compounds or diseases must also comply with applicable global or SET areas standards, such as the [Global Standard: Press Releases and Media Material](#).

- 8.4. Where press releases are included in digital media, the intended audience(s) must be clearly identified (e.g. business and financial press, medical press, medical correspondents of the lay press, or all of these) and the nationalities of the intended press audience must be clear (e.g. global, international except USA, national).

9. CRISIS COMMUNICATIONS

- 9.1. In the event of a crisis (an unplanned event which impacts, or has the potential to impact business continuity and/or our reputation), communications must be managed in line with the prescribed escalation process and other provisions of the applicable global or SET area standards, such as the [Global Standard: Crisis Management](#).

10. ELECTRONIC AND DIGITAL COMMUNICATIONS

- 10.1. 'Digital media communication' is defined as an externally facing AstraZeneca digital communication or communication channel, such as Company social media activity, website, mobile site, application or online banner advertisement. AstraZeneca digital media communications are created by or on behalf of the Company and include sites where we have a degree of editorial control or influence over the content.
- 10.2. Electronic and digital communications are subject to the same rules that apply to all Company Communications and therefore must comply with the requirements of this Policy and all relevant supporting policies.
- 10.3. Electronic communications include telephone, voicemail, e-mail, electronic file transfer, instant messaging (electronic chat), electronic conferencing and electronic collaboration tools and virtual meeting platforms.
- 10.4. Social media include platforms such as internet forums, web logs (internet diaries or blogs), social networking sites, wikis and virtual worlds. Staff must be aware that some of these social media channels are subject to more specific Company or functional restrictions, which must be followed wherever they apply. In particular, staff must also comply with the applicable global or SET area standards for computer use and electronic communications, such as the [Corporate Information Technology Usage Policy](#) and *Global Standards: Digital Media Communications*.
- 10.5. Digital media communications must be approved through applicable internal review processes; approvals must include acceptability of content, IT security and business justification.
- 10.6. Digital media communications, including their content, must be reviewed and re-approved periodically and, where necessary, updated to ensure that these communications continue to provide the benefits outlined in the original business case and that information remains current and compliant.
- 10.7. Digital media communications must have a nominated business owner throughout their life-cycle, who is responsible for ensuring that these communications are appropriately approved and compliant with this Policy, any other relevant global policies and functional or local standards.

- 10.8. Digital media communications that no longer serve a regulatory, medical, or patient purpose etc. must be withdrawn in a timely manner in accordance with the *Global Standards: Digital Media Communications*.
- 10.9. Protected access sites (extranet sites), such as those set up with Company suppliers, agencies, or contractors, are not 'general public facing' and are exempt from the policies and standards defined within this *Global Communications Policy* document.
- 10.10. Closed extranet sites which include medical or promotional information for Company products and are included in the requirements relating to Company digital media communications and other relevant requirements (e.g. with respect to advertising).
- 10.11. Business to business activities using extranet sites must be performed with a contract in place, and the contract and execution of activities must comply with all Company digital requirements.
- 10.12. All digital channels must be consistent with IS (IT for the USA) systems and security policies and standards.
- 10.13. Subject to your local law, employees should be aware that in some circumstances your electronic communications, whether business-related or personal, that are created, accessed, analyzed, transmitted, stored or distributed using Company equipment, systems or networks may be monitored by AstraZeneca.

11. COMMUNICATING AS PART OF OUR DAY-TO-DAY BUSINESS ACTIVITY

- 11.1. The requirements of this Policy regarding internal approval do not apply to our communications with each other, and any third party, when such communications are a reasonable and necessary part of our day-to-day business activity (e-mail, handwritten notes, phone calls etc), consistent with our individual roles and authority. However, all communications can be subject to external scrutiny, including disclosure in litigation and other proceedings, and therefore all staff must ensure that all their communications are appropriate and in line with all relevant requirements of this Policy and the [AstraZeneca Code of Conduct](#).
- 11.2. The requirements of this Policy for communications to be accurate and consistent with previously agreed global positions are not intended to prevent legitimate and well-informed discussion in relation to informal, day-to-day business activities, nor to inhibit the proper and appropriate exchange of information when staff act as nominated Company representatives on professional or similar bodies.

12. CORPORATE BRAND IDENTITY

- 12.1. AstraZeneca's positioning, 'What science can do' sits at the heart of our global business and should be reflected in all our communications. The use of corporate and product brands in both internal and external communications is governed by specific standards and guidance available from OnBrand (www.onbrand.astrazeneca.com) and in the relevant product brand guides. This covers all internal, external and digital communications, including advertising, collateral materials and social media.

- 12.2. The use of the AstraZeneca name, identity or logo in communications by our suppliers is subject to a specific approval process as set out in the Supplier use of AZ name and identity guidelines, also available on OnBrand.
- 12.3. The AstraZeneca name, logo, branding and color scheme must be obtained or sourced from OnBrand.
- 12.4. MedImmune Corporate Affairs must be consulted regarding activity relating to the MedImmune identity.

13. GLOBAL DIGITAL MEDIA CHANNELS

All Company digital assets and channels must be recorded in the AstraZeneca [Global Digital Governance Inventory](#). The Global Digital Governance Inventory is a platform built to address regulatory and audit findings by providing a repository of curated data specific to external AstraZeneca Digital channels. The Inventory provides an interface for asset owners to actively record, manage and administer their digital channels, addressing compliance and regulatory requirements in the process. The Inventory also provides an interface to all AstraZeneca resources to view and retrieve reports on AstraZeneca Digital Communications.

13.1 Mobile applications

- 13.1.1. All mobile applications must follow a common lifecycle process consisting of planning, creating, launching, managing, and retiring. The AstraZeneca *Global Standard: Digital Media Communications* defines the mandatory global processes that must be followed, as well as recommended local processes that must be considered throughout the mobile application lifecycle.
- 13.1.2. Appropriate management and regulatory approval must be obtained for the creation of any new mobile application. If a mobile application is being replicated across Marketing Companies, approval from each local market must be obtained.
- 13.1.3. Owners of mobile applications published to global audiences must obtain the approval of all impacted Marketing Companies.

13.2 Websites

- 13.2.1. A customized national website must always be considered prior to the development of an above-country website.
- 13.2.2. Above-country websites, *i.e.* websites that are directed at multiple countries or a region such as Europe, must be created when it is impossible or inappropriate to produce national websites that are approved in line with a single country's applicable regulations and codes.
- 13.2.3. Unless above-country websites in English have been approved by the UK or US approval procedures, a prominent notice must be included indicating that the site is not

intended for US/UK visitors and providing alternative links to relevant UK and US sites. Links must also be included for other national visitors where national sites exist.

- 13.2.4. An above-country brand website targeted at a European medical audience may be provided, subject to approvals, when a product has been registered by the European Medicines Agency.
- 13.2.5. English must be the default language used for above-country brand websites. A website may be offered in various other international languages, as business needs dictate.
- 13.2.6. Corporate sites containing only business-oriented information for financial analysts, stockholders, and potential employees are not considered promotional.
- 13.2.7. Visit AstraZeneca's [domain name website](#) on the [Global Digital Centre of Excellence](#) portal for information on domain name policy, strategy, and other related matters. Additional information is available on the domain names intranet or by contacting Global Digital Governance at digitalgovernance@astrazeneca.com.

13.3 Social Media

- 13.3.1. All social media accounts, blogs, webpages, and related content carrying the AstraZeneca brand identity are and will be owned and licensed by AstraZeneca as appropriate. Personal accounts, blogs, webpages, and related content that do not carry the AstraZeneca brand identity can be owned, licensed, and operated by any AstraZeneca personnel.

What you must always do when using social media on behalf of the business

- 13.3.2. Disclose your affiliation with AstraZeneca: If you talk about AstraZeneca-related matters that are within your area of job responsibility, you must disclose your affiliation with the Company.
- 13.3.3. You must state that your posting is your opinion when commenting on AstraZeneca-related business. Unless authorized to speak on behalf of the Company, you must state that the views expressed are your own. Contract workers or temporary staff must not speak on behalf of AstraZeneca when not working on behalf of AZ – i.e. they are off the clock.
- 13.3.4. Act responsibly and ethically when participating in online communities. Do not misrepresent yourself.
- 13.3.5. Honour our differences by living the AstraZeneca values. The Company will not tolerate discrimination (including age, sex, race, colour, creed, religion, ethnicity, sexual orientation, gender identity, national origin, citizenship, disability, or marital status or any other legally recognized protected basis under federal, state, local laws, regulations, or ordinances).

What you must never do when using digital media

- 13.3.6. Do not provide advice on AstraZeneca products, medical diagnoses, or trials. All AstraZeneca-related commentary on products must go through the proper marketing and legal review.

- 13.3.7. Do not disclose non-public financials or operational information. This includes strategies, forecasts, and pipeline progress. This information must be shared through the designate channels.
- 13.3.8. Do not publicly share internal communications.
- 13.3.9. Do not share any Personal Data about other individuals, whether they be our customers, patients, employees or suppliers without the individual's consent. This includes any information about an identified or identifiable person.
- 13.3.10. Do not comment on or share anything to do with a legal case or proceeding.
- 13.3.11. Do not publicly share anything that belongs to someone else. This includes illegal music sharing, copyrighted publications, and all logos or other images trademarked by AstraZeneca or other entities. With the exception of assets intended to be shared i.e. social media assets or web pages with a sharing facility.
- 13.3.12. Do not publish, post, or release information that is considered confidential or proprietary.
- 13.3.13. Do not post anything that you are uncertain is appropriate or approved for disclosure outside of AstraZeneca. Always err on the side of caution and be conservative when posting to social media.