

AstraZeneca

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ASTRAZENECA GLOBAL POLICY

ETHICAL INTERACTIONS & ANTI-BRIBERY / ANTI-CORRUPTION

1. PURPOSE

This Policy describes what is required to meet AstraZeneca's ("AZ's") commitment to operate ethically in our business and personal interactions with third parties, including:

- **Patients** – members of the general public who use or may use AZ products.
- **External stakeholders** – AZ's key stakeholders (other than patients). Examples include: healthcare professionals ("HCPs") (including members of the medical, dental, pharmacy and nursing professions, and relevant administrative staff), healthcare organisations ("HCOs"), payors, scientists, medical societies, patient groups and public officials.
- **Other third parties** – third parties (other than external stakeholders or patients). Examples include: the media, vendors, suppliers, distributors, agents and partners.

If a third party could be considered to fall under more than one of the above categories, the more strict requirements apply.

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 a contract sales organisation), this will be detailed in the signed contract or other written agreement with the third party.

3. SCOPE

This Policy is supported by Global Standards covering:

- Items of value and hospitality
- Contributions
- Meetings
- Engaging third parties
- Pre-approval activities by Commercial employees
- Externally sponsored scientific research.

This Policy is also supported by Global Procedures and Global Guidelines in some areas. 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 more strict than this Policy and its 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.

4. POLICY STATEMENTS

4.1 General

- 4.1.1** You must not attempt to avoid AZ's requirements by asking, allowing or enabling third parties (including relatives, friends or other associates) to engage in prohibited conduct on your (or AZ's) behalf.
- 4.1.2** You must use reasonable business judgment to document your business decisions and supporting rationales in a way that sufficiently demonstrates compliance with AZ's requirements.
- 4.1.3** You must obtain all reviews and approvals mandated by AZ's requirements in advance of any activity.
- 4.1.4** The term "AZ products and uses" refers to both approved and unapproved products and uses, unless otherwise specified.

4.2 Anti-Bribery & Anti-Corruption

- 4.2.1** The term "something of value" refers to any financial or non-financial benefit, such as cash, compensation for services, a gift or other item of value, a meal or other hospitality, a contribution, or even providing access to resources or information. You may give or receive something of value in appropriate circumstances, according to AZ's requirements.
- 4.2.2** Bribery is giving or receiving something of value that is intended or could be seen as improper influence – in other words, as an inducement or reward for behaviour that is dishonest, illegal or a breach of a duty of impartiality, trust or good faith. AZ has zero tolerance for bribery or any other form of corruption, even if AZ loses business as a result.
- 4.2.3** You must not directly or indirectly give, offer or promise a bribe, or authorise anyone else to do so. You must not directly or indirectly receive, solicit or agree to accept a bribe, or authorise anyone else to do so. This also applies to third parties engaged by AZ for services. For example, you must not give or receive something of value:
 - To influence, expedite or reward an official action or decision by a public official.
 - To induce or reward an action favourable to AZ, such as prescribing AZ products.
 - To compromise or influence an individual's independence or judgment.
 - To secure an improper business or personal advantage.
- 4.2.4** If you are in a situation where there is any suggestion of bribery, you must promptly seek the support of your line manager or your Legal or Compliance partner to take any necessary actions.
- 4.2.5** All payments to third parties must be made via an approved AZ financial payment system by bank transfer, cheque or company credit card, and must be appropriately recorded in AZ's books and records. Specifically-authorized third parties may make payments on AZ's behalf if there is a genuine business need, as long as the third party is required by signed contract or other written agreement to document, track and report the payments to AZ.

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4.2.6 Payments must not be made to any third party in cash or cash equivalent (such as a gift card), except in the limited circumstances approved by Finance.

4.3 Items of Value & Hospitality

4.3.1 For purposes of this Policy, the term “items of value” refers to such items as gifts, external stakeholder educational items, patient items and patient programmes, samples and awards.

4.3.2 The term “hospitality” refers to meals (food and/or beverages), travel and accommodation, and other directly related, incidental expenses. The term also refers to invitations or tickets to social events or entertainment events (such as sporting/fitness, theatre, music or recreational events).

4.3.3 Items of value and hospitality may be given or received only occasionally, and must be modest in value (except in the limited circumstances described in this Policy’s supporting global documents). For hospitality, the venue must be modest and incidental to the business purpose (except as described in the supporting global documents), and the geographic location must be appropriate to the business purpose.

4.3.4 Business units must establish relevant procedures with specific value limits to define what is modest, to guide employees on appropriate value levels that would not create actual or perceived improper influence.

4.3.5 Business units must also establish relevant procedures to enable AZ to satisfy external transparency and reporting obligations with respect to items of value and hospitality given to external stakeholders.

4.3.6 Items of value must not financially benefit any external stakeholder by providing resources or services that they would be expected or required to provide themselves to fulfill their obligations under local law, contract or customary business practice (for example, anything considered to be basic medical equipment or basic nursing services under local standards of care, or items or skills to improve administrative efficiencies, such as software for billing or tax returns).

4.3.7 Items of value and hospitality must not be given with the intent to improperly influence the recipients or ultimate beneficiaries to take any favourable action towards AZ (such as prescribing or using AZ products), and must not create an appearance of improper influence. For example:

- Items of value must not be given to reduce the cost of purchasing or reimbursing AZ products or to influence any other decision about listing, purchasing or reimbursing AZ products.
- Recipients must be selected based on objective, appropriate criteria (for example, the mission of the recipients or the unmet needs of the ultimate beneficiaries), and with no intent to provide the recipients or the ultimate beneficiaries with a competitive advantage.
- Any compensation paid to external stakeholders engaged to perform services in connection with a patient programme (such as compensation for nurses as part of a nursing programme) may only be given for legitimate services that are necessary to fulfil the objectives of the programme, and must not exceed fair market value.

4.3.8 You must not advise or suggest that recipients may seek reimbursement or bill patients for resources or services specifically provided (for example, with respect to patient items and programmes, recipients must not seek reimbursement or bill patients for the particular medical equipment or nursing services received). However, the recipients may seek reimbursement or bill patients for legitimate costs indirectly associated with such resources

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or services (such as the cost of individual tests performed by the medical equipment or the cost of the medicines administered by the nurse).

- 4.3.9** Items of value must not promote AZ products or uses before regulatory approval and must not create an appearance of doing so.

4.4 Pricing, Discounts & Rebates

- 4.4.1** Business units must have approved pricing models in place to govern the pricing, rebates and discounts (and other commercial advantages or favourable terms) given to third parties for AZ products.

- 4.4.2** Any deviations from these models must be approved and periodically reviewed by senior management and must be appropriately documented.

4.5 Contributions (Donations, Sponsorships & Partnerships)

- 4.5.1** The term “contributions” refers to financial or non-financial support (for example, funds or in-kind assistance, such as resources, services, facilities or employee time) given by AZ to third party recipient organisations (“recipients”). Contributions may be classified as either donations, sponsorships or partnerships (and are commonly referred to as “grants”).

- 4.5.2** You may generally give contributions only for legitimate scientific, educational or charitable purposes to support health or healthcare systems, medical or scientific education, advances in medical or scientific research, or disaster relief. Senior management must exceptionally approve in writing contributions to support other appropriate areas.

- 4.5.3** Contributions may only be given to legitimate, established organisations. You must conduct appropriate due diligence to confirm this and to confirm that the contribution will be used by the recipients in line with the intended purpose.

- 4.5.4** Contributions must not be given directly to any individual or to any HCP practice (that is, a group of HCPs owning and sharing the same premises or other resources), and must not be given for the personal benefit of any individual or any HCP practice selected by AZ (or to disguise any such personal benefit), except in the limited circumstances described in the *Global Standard on Contributions*. For clarity, awards from AZ to AZ-selected recipients are subject to the requirements of the *Global Standard on Items of Value and Hospitality*.

- 4.5.5** Contributions must not be given with the intent to improperly influence the recipients or ultimate beneficiaries to take any favourable action towards AZ (such as prescribing or using AZ products), and must not create an appearance of improper influence. For example:
- A contribution must not be given to reduce the cost of purchasing or reimbursing AZ products or to influence any other decision about listing, purchasing or reimbursing AZ products.
 - The level of support given through a contribution must be proportionate to the anticipated cost of the AZ-supported activity or initiative.
 - Recipients must be selected based on objective, appropriate criteria (for example, the mission of the recipients or the unmet needs of the ultimate beneficiaries), and with no intent to provide the recipients or the ultimate beneficiaries with a competitive advantage.
 - Any contribution used to support compensation paid to external stakeholders engaged to perform services in connection with a patient programme (such as compensation for nurses as part of a nursing programme) may only be given for legitimate services that

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are necessary to fulfil the objectives of the programme, and must not exceed fair market value.

- 4.5.6** Contributions must not be given if a potential recipient suggests the possibility of favourable action towards AZ or makes a threat against AZ in connection with the contribution, even if there is a legitimate need for the contribution.
- 4.5.7** You must obtain written agreement that the recipients will not seek reimbursement or bill patients for any resources or services specifically provided through a contribution (for example, with respect to contributions for patient items or programmes, recipients must not seek reimbursement or bill patients for the particular medical equipment or nursing services received). However, the recipients may seek reimbursement or bill patients for legitimate costs indirectly associated with such resources or services (such as the cost of individual tests performed by the medical equipment or the cost of the medicines administered by the nurse).
- 4.5.8** The resources, services, activities or initiatives funded or provided by contributions must not promote AZ products or uses before regulatory approval and must not create an appearance of doing so.
- 4.5.9** Contributions must not be given for any other improper purpose or use. For example:
- To provide any item of value or hospitality or to support any activity or initiative prohibited by AZ's requirements.
 - To support any organisation, activity or initiative that is known to discriminate on any unlawful basis.
 - To support any activity or initiative that could cause embarrassment to AZ or otherwise damage AZ's reputation.
- 4.5.10** Contributions to support a meeting or other event may be given only if the venue, hospitality, items of value and other arrangements provided by AZ or the event organiser are modest and incidental to the purpose of the event, except in the limited circumstances described in this Policy's supporting global documents. The geographic location must be appropriate to the purpose of the event.

4.6 Political Support & Political Activities

- 4.6.1** You must not give political support (for example, funds or in-kind assistance) or participate in political activities (for example, lobbying activities or political fundraising events) on behalf of AZ unless specifically authorised by Government Affairs. Third parties engaged by AZ for services must not give political support on behalf of AZ under any circumstance, and may participate in political activities only if specifically authorised by Government Affairs.
- 4.6.2** Political support may only be given where expressly permitted by local law and acceptable as part of local custom and practice.
- 4.6.3** Political support must be given by AZ directly to the recipient organisation or individual. The AZ approval, the name of the recipient, and the purpose, date, nature (for example, financial or non-financial support) and value of the support must be appropriately documented to ensure transparency.
- 4.6.4** You must not suggest that you represent AZ when giving political support or participating in political activities in a personal capacity.

4.7 Payments to Public Officials & Public Sector Organisations

- 4.7.1** The term "public sector organisations" refers to government entities at the international, national, regional or local level. The term also refers to state-owned or state-controlled entities, such as a state-owned or state-controlled hospital, or any entities that perform a public function. The term "public officials" refers to individuals who serve as officials or agents of any public sector organisation, or who are candidates for such positions. The

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term also refers to any other individuals employed by a public sector organisation, including, for example, HCPs employed by a state-owned or state-controlled hospital.

- 4.7.2** You may give payments to individual public officials when they are engaged to provide legitimate services to AZ. You may also give required or authorised payments to public officials or public sector organisations with respect to taxes, permits, licences, inspections and other appropriate, official fees; all such payments must be supported by official government receipts and must be appropriately documented in AZ’s books and records.
- 4.7.3** You must not give facilitation payments to public officials (unofficial or “grease” payments to speed up actions or decisions that the official has a duty to perform), even if the payments are small in amount, unless you are under duress – that is, when you reasonably fear for your personal safety or the personal safety of others. This also applies to third parties engaged by AZ for services.
- 4.7.4** You must promptly report the following situations in writing to your line manager:
- A facilitation payment that has been requested but not paid.
 - Any payment that has been demanded under duress, whether paid or not.

Your line manager must then promptly inform his/her Legal partner in writing and ensure appropriate documentation in AZ’s books and records of any payment actually made. The Legal partner will support you and your line manager with any necessary actions, including reporting to relevant authorities.

4.8 Avoiding Conflicts of Interest

- 4.8.1** You must ensure that your personal interests, activities and relationships do not create a conflict of interest – in other words, that they do not influence or appear to influence your professional judgment when acting or making business decisions on AZ’s behalf. This also applies to third parties engaged by AZ for services. You must inform your line manager in writing of any actual, apparent or potential conflict of interest (involving you or a third party engaged for services) when you become aware of it, even if you are unsure. Your line manager must provide written direction on how to resolve or avoid the conflict of interest.
- 4.8.2** You must not perform any paid work outside of AZ, or any volunteer work outside of AZ related to your AZ work responsibilities, unless you obtain written approval from your line manager (or from your relevant Senior Executive Team (“SET”) member or designee, if paragraph 4.8.3 applies). This includes accepting an appointment to the Board of Directors of an external organisation that operates in the healthcare or scientific arena.
- 4.8.3** If you are an AZ-employed HCP who wants or needs to perform paid or volunteer work outside of AZ that involves treating patients, dispensing pharmaceutical products, or other activities related to the use, purchase or reimbursement of pharmaceutical products, you must obtain written approval from your relevant SET member or designee.
- 4.8.4** All approvals required by paragraphs 4.8.2 and 4.8.3 must be based on a determination that your participation in the outside work does not compromise or appear to compromise AZ’s business interests or reputation. If your outside work is approved, you must ensure that it does not influence or appear to influence your professional judgment when acting or making decisions on AZ’s behalf. If paragraph 4.8.3 applies, you must also ensure that your AZ employment does not influence or appear to influence your objectivity in performing the outside work.
- 4.8.5** You must not use AZ resources or your position as an AZ employee for your personal benefit or for the benefit of your relatives, friends or other associates. You must not participate in any purchasing or other decision related to any third party in which you, a relative or a friend has a financial or management interest (other than a small shareholding interest through a publicly-available investment).

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4.8.6 You must not use or pass along non-public AZ information for your personal gain or the personal gain of others. You must not pass along such information to anyone inside or outside of AZ who does not have a legitimate need for the information.

4.9 Meetings with External Stakeholders

4.9.1 Meetings with external stakeholders (planned gatherings that are either organised by AZ or supported by AZ) must have a scientific, educational or other legitimate business purpose.

4.9.2 Independent congresses are a type of non-promotional meeting subject to particular requirements included in the *Global Standard on Meetings* and the *Global Standard on Contributions*.

4.9.3 The venue, hospitality, items of value and other arrangements made for meetings must be modest and incidental to the purpose of the meeting, except in the limited circumstances described in this Policy's supporting global documents. The geographic location must be appropriate to the purpose of the meeting.

4.10 Engaging Third Parties & Ensuring Compliance

4.10.1 You may engage a third party (including external stakeholders and patients) for services only if there is a genuine business need, and only in the necessary amount. You may engage only those third parties who are qualified and appropriate to provide the services.

4.10.2 Third party engagements must not be used (or appear to be used) as a way to gain access to the third party, to disguise promotion of AZ products or uses, or to induce or reward any favourable action by the third party towards AZ, such as prescribing or using AZ products.

4.10.3 You must not give any payments to a third party for voluntary activities or for incidental activities that are not necessary to address a genuine business need.

4.10.4 When engaging a third party for services, you are accountable for ensuring that the third party's reputation and conduct are consistent with AZ's high ethical standards. You must ensure that appropriate risk assessments and any necessary due diligence are conducted before agreeing to the engagement. Based on this, you may be required to take some actions to address any risks identified, such as including relevant clauses in the agreement, reserving audit rights, or communicating any necessary training. You must also ensure that you maintain continued oversight and conduct periodic reassessments throughout the engagement.

4.10.5 If you become aware, before or during an engagement, that a third party has been the subject of any allegation, investigation or conviction for bribery or other form of corruption or unlawful conduct, you must work with your Legal or Compliance partner (as appropriate) to evaluate the information before continuing with the engagement.

4.10.6 Compensation for a third party's services must not exceed fair market value, reflecting the type, amount and duration of the services and the third party's qualifications. You may also pay or reimburse a third party for modest expenses that are incidental and directly related to the services.

4.10.7 If an engaged third party does not perform all of the agreed services, you must reduce the agreed compensation to reflect only those services actually provided, and you may pay or reimburse only those expenses directly related to the services actually provided.

4.10.8 For engagements with external stakeholders, business units must establish fair market value guidelines (using reputable external data where available); local marketing companies must also establish limits on aggregate compensation and engagement frequency for compensation and engagements within their budgetary control. These guidelines and limits must be established in order to prevent improper influence or an appearance of improper influence when engaging external stakeholders for services. In situations where multiple local marketing companies are likely to engage a particular external stakeholder, they should share data to ensure that the total compensation and engagements across local marketing companies are not excessive and do not create

improper influence or an appearance of improper influence. For clarity, aggregate compensation limits include only fees for services and do not include spend on external stakeholders for items of value or hospitality.

4.10.9 Business units must also establish relevant procedures to enable AZ to satisfy external transparency and reporting obligations with respect to compensation paid to external stakeholders.

4.11 Promotional & Non-Promotional Activities & Materials

4.11.1 General

4.11.1.1 Promotional and non-promotional activities and supporting materials must be approved through AZ's applicable internal review procedures. They must be accurate, substantiated, fair and balanced, and not misleading, allowing HCPs to assess the therapeutic value of AZ products in the interest of patient care.

4.11.1.2 Promotional and non-promotional materials must be approved before use or modification, and must be accompanied by the approved product labelling where applicable. They must be assigned an expiration date upon approval, which must be tracked to ensure that expired materials are not used.

4.11.1.3 Promotional and non-promotional activities and supporting materials directed to patients may only be conducted or used where permitted by local law. When communicating with patients, AZ must not give medical advice, but must instead refer the patients to their HCPs for further information.

4.11.1.4 Scientifically-trained employees (as defined in paragraph 4.11.3.3 below) and Commercial employees may collaborate or coordinate in appropriate circumstances to develop and deliver promotional and non-promotional activities and supporting materials, but they must not direct each other's activities.

4.11.1.5 AZ employees in customer-facing roles must be appropriately trained on AZ products and uses and related information, using only approved training materials.

4.11.2 Promotional Activities & Supporting Materials

4.11.2.1 Promotional activities and supporting materials include all activities and materials that are intended or could be seen to promote the prescription, administration, recommendation, purchase, payment, reimbursement, authorisation, approval, supply or use of AZ products.

4.11.2.2 You must not promote AZ products or uses before the product or use has received the necessary regulatory approval. Promotional activities and supporting materials must be consistent with the approved product labelling, must not involve discussions of unapproved AZ products or uses, and must only be directed at HCPs in appropriate medical specialties.

4.11.3 Non-Promotional Activities & Supporting Materials

4.11.3.1 Non-promotional activities and supporting materials include all activities and materials that are not promotional and that are intended to provide scientific or educational information about AZ products or uses, relevant disease areas, or health and medicines generally. They may take a number of forms, including disease awareness programmes, responses to inquiries from external stakeholders or patients, scientific/medical education at meetings, scientific publications, information to support the development of guidelines, and other information contributing to scientific exchange.

- 4.11.3.2 Non-promotional activities and supporting materials must not be used to promote AZ products or uses, must be presented in an objective, balanced manner, and must be scientific in tone, language, appearance and intent.
- 4.11.3.3 Scientifically-trained employees are highly-trained experts with relevant, specialised scientific or medical knowledge, whose responsibilities include providing scientific and/or medical information. This category of employees excludes anyone in local marketing company sales or marketing roles, even if they have scientific or medical training or backgrounds.
- 4.11.3.4 Inquiries about unapproved AZ products or uses from external stakeholders or patients must be referred to scientifically-trained employees. These inquiries may only be referred to other specifically-authorized employees or third parties for response if exceptionally approved in writing by the relevant SET member and the Chief Compliance Officer. This exceptional approval must be based on an evaluation of the external environment (for example, relevant regulatory and medical practice standards, adopted industry codes, and professional certification processes) and a determination that there is a low and well-managed risk of promotion of an unapproved AZ product or use.
- 4.11.3.5 All AZ responses to such inquiries, either oral or written, must come directly and only from such scientifically-trained employees or other specifically-authorized employees or third parties, and must meet all of the following requirements:
- Information may only be provided in response to unsolicited (that is, unprompted) inquiries.
 - Information must be accompanied by the approved product labelling, where applicable.
 - All responses must be limited to the scope of the inquiry and must provide data which are appropriate to the source of the inquiry.
 - All responses must contain a statement that the information requested involves an unapproved AZ product or use and that AZ does not recommend unapproved uses of the product, where applicable.
- 4.11.3.6 Scientifically-trained employees may also present or submit scientific data or findings involving approved or unapproved AZ products or uses, to support scientific exchange and learning. These employees may submit scientific data to support the development of guidelines, and may also engage in other activities associated with the development or dissemination of guidelines (such as participating in authorship of the guidelines), when approved through AZ's applicable internal review procedures.
- 4.11.3.7 Specifically-authorized employees may issue press releases and other non-promotional materials (such as financial or investor information) that have been approved through AZ's applicable internal review procedures.

4.11.4 Pre-Approval Activities by Commercial Employees

- 4.11.4.1 Promotion of an AZ product or use before regulatory approval is considered pre-approval promotion and is a form of prohibited off-label promotion. Pre-approval activities and supporting materials must be non-promotional and must be approved through AZ's applicable internal review procedures. They must not be used to disguise pre-approval promotion and must not create an appearance of doing so.
- 4.11.4.2 Scientifically-trained employees may conduct various activities before regulatory approval of an AZ product or use, according to AZ's requirements. Commercial employees may also conduct some of these activities in

appropriate circumstances, subject to the requirements of the *Global Standard on Pre-Approval Activities by Commercial Employees*.

4.11.4.3 AZ may also engage third parties to conduct pre-approval activities, based upon a genuine business need.

4.12 Non-Interventional Studies (“NIS”)

4.12.1 For an NIS, as defined in relevant procedures, AZ must not be involved in the decision to place a particular patient on a specific AZ product; that decision must be made solely by the patient’s HCP and the patient. Patients must not be given an AZ product or switched to an AZ product for the purpose of taking part in the study.

4.12.2 An NIS must not be used to promote AZ products or to train HCPs on the use of a particular therapy. An NIS must address a genuine scientific or medical question to which AZ needs the answer. The collected data must undergo a formal analysis by AZ or a third party on AZ’s behalf.

4.13 Externally Sponsored Scientific Research (“ESR”)

4.13.1 AZ recognises ESR, as defined in this Policy’s supporting global documents, as an important way to advance science and contribute to the development of better medicines for patients.

4.13.2 ESR must not be used to promote AZ products or to train HCPs on the use of a particular therapy. AZ may support ESR only if there is a genuine scientific or medical question to be answered and only if the researchers are qualified to conduct the research.

4.13.3 Employees in local marketing company sales or marketing roles must not have any involvement in the selection of ESR to receive AZ support. Other employees involved in ESR must not engage in any activity that would compromise the independence of the researchers.

5. GLOSSARY

Not required.

6. REFERENCES

Not required.

7. REVISION HISTORY

Version	Description of Change
6.0 (April 2015)	Simplification of content and alignment with new Global Policy template. Creation of new supporting <i>Global Standard on Pre-Approval Activities by Commercial Employees</i> .