

Anti-Bribery and Anti-Corruption (ABAC) Policy

Integrity is at the core of how we work at Boehringer Ingelheim ("BI"). BI does not permit or tolerate any form of corruption or bribery. BI is committed to complying with all applicable anti-bribery and anti-corruption laws worldwide ("ABAC laws").

Responsibilities

Each employee within the BI Group and third parties acting on behalf of BI are responsible for compliance with all applicable ABAC laws, regulations, this Policy and related procedures. This Policy should be interpreted in accordance with local laws and customs, and where a conflict results, the local policies should be followed if more restrictive.

Management is responsible to ensure effective local implementation of this Policy and an adequate ABAC program at the local level.

Prohibition of Bribery and Corruption

BI does not permit or tolerate any form of corruption or bribery.

BI prohibits its employees from directly or indirectly requesting, receiving, accepting or giving, promising, or offering to a third party any payment, benefit or anything of value (regardless of whether for oneself, BI, or a third party) in order to:

- ✘ improperly influence any act or decision; or
- ✘ attempt to secure an improper advantage or favor for oneself, BI, or a third party; or
- ✘ grant an unfair preference in the procurement of goods and services or otherwise obtain or retain business including any commercial transaction for BI through inappropriate means.

Engagement of Third Parties

When engaging third parties and other intermediaries to perform services on behalf of BI, appropriate selection, contracting and due diligence must be conducted to mitigate ABAC risks as defined in the ABAC procedures.

Conflicts of Interest

Each employee shall always strictly keep company and private interests separate so as to avoid possible conflicts of interest.

Prohibition of Facilitation Payments

BI prohibits all facilitation payments as they are considered as bribes. These payments are unofficial, improper, small payments or gifts offered or made to government officials to secure or expedite a routine or necessary action to which BI is legally entitled.

Records and Documentation

All books and records must be kept accurately and in reasonable detail, and must fairly reflect all transactions and disposition of assets, with adequate supporting documentation complying with all applicable rules, laws and regulations.

Responsibility To Report

All employees are responsible for reporting any known or suspected violations of this Policy or any ABAC laws using available reporting channels.

10/2016



Hubertus v. Baumbach Joachim Hasenmaier Allan Hylgrove Simone Menne Andreas Neumann Michel Pairet