



# ILSI

Conformed as of January 21, 2012  
by the ILSI Board of Trustees

## ANTI-CORRUPTION POLICY

**Maintaining a Corruption-Free Culture.** ILSI is committed to sustaining a culture free from corruption in transactions between government officials and employees and other representatives of ILSI. 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 ILSI seek to cultivate through their work in support of global public health.

### **Statement of ILSI Policy.**

1. It is the policy of ILSI that each of our trustees, employees, staff, agents, representatives, and other third parties that interact with government officials on behalf of ILSI shall comply with the anti-bribery laws of the countries where ILSI engages in activities.
2. Bribery of any kind, in any country, regardless of local custom or practice, is strictly prohibited.
3. No ILSI trustee, employee, staff, agent, representative, vendor or any other third party with which ILSI 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 ILSI or for ILSI'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. No ILSI funds shall be used to make contributions to political parties or candidates for elected office in any country.
5. It is also the policy of ILSI that each of its employees, staff, agents, representatives, vendors and all third parties that work with ILSI make and keep books, records, and accounts, which, in reasonable detail, accurately reflect any transactions and dispositions of ILSI.
6. To the extent permitted by applicable national and local law, ILSI may reimburse travel expenses and provide meals and entertainment to Officials as part of a legitimate ILSI 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.** As used in this policy, "ILSI" means the International Life Sciences Institute and all of its branches throughout the world, as well as the ILSI Research Foundation and the ILSI Focal Point in China. Representatives of ILSI who are covered by this policy include employees, officers, and agents of companies that are members of ILSI when those persons are acting for ILSI in a representative capacity. In addition to the civil and criminal fines and penalties imposed by applicable anti-corruption laws, violators of this ILSI policy may be subject to disciplinary measures imposed by ILSI. Penalties for violations will vary with the circumstances, but may include termination of the offender's relationship with ILSI.

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

January 2012