

Advanced Therapeutics within Everyone's Reach

Summary of Global Anti-Corruption Policy

2025.07

Global Compliance Team



At Celltrion, we are committed to conducting business ethically and in full compliance with anti-bribery and anti-corruption laws worldwide. Celltrion's Global Anti-Corruption Policy is designed to prevent corruption risks and uphold transparency in every aspect of our global operations. Below is a detailed summary of the key components of our anti-corruption policy.

1. Prohibited Transactions

Bribery is not limited to cash payments. It includes offering, promising, or giving anything of value—such as gifts, hospitality, travel, charitable donations, employment offers, or product samples—with the intent to influence a decision or secure an unfair advantage. Even the mere offer of a bribe is prohibited, regardless of whether it is accepted or results in action.

Importantly, indirect bribery through third parties such as agents, distributors, or consultants is also banned. Employees must not ignore suspicious circumstances or "red flags"—like vague contracts, unusual payment structures, or close ties to government officials.

2. Definition of Government Official

A "Government Official" includes anyone working for:

- A government body or agency (local, regional, or national)
- A state-owned enterprise (e.g., public hospitals, utilities)
- International organizations (e.g., UN, ADB, WHO)
- Political parties or as candidates for public office
- Any entity that receives significant government funding

In state-managed economies, even employees of companies that appear private may be considered government officials. When in doubt, consult the compliance team.

3. Public Officials and Healthcare Professionals

Most countries have strict laws governing interactions with public officials and healthcare professionals. These laws often prohibit gifts, entertainment, and financial support, even when no improper intent exists.

All such interactions must follow Celltrion's internal guidelines for engaging with these stakeholders and require prior approval from the compliance team or designated personnel.

4. Commercial Bribery

In addition to government bribery, commercial bribery—offering benefits to private company employees to gain a business advantage—is prohibited. This includes actions that would cause the recipient to violate their duties of loyalty, fairness, or transparency to their employer.

Even if the benefit is never accepted or used, merely offering or soliciting such an advantage is a policy violation.

5. Interactions with Stakeholders

All interactions involving support to stakeholders must be accurately recorded, which includes the date, cost, recipient, and purpose. This ensures full transparency and accountability.

A. Gifts

Permitted only if the gift is of low value, given occasionally, and aligned with local customs and applicable laws. Under no circumstances may cash or cash equivalents (e.g., gift cards) be provided. All gifts must receive prior approval from the compliance team.

B. Hospitality & Entertainment

Reasonable expenses related to business events may be allowed, excluding luxury arrangements (e.g., 5-star hotels or first-class flights). Entertainment must not appear lavish or personal in nature, and spouses or guests are not eligible for support.

C. Support for Meetings

Travel and registration costs for educational or promotional meetings can be supported if lawful and reasonable.

D. Celltrion Facility Visits

Site visits for promotional or educational purposes are permitted if lawful and reasonable. However, support for inspections mandated by law is not allowed, unless specifically required by local regulations.

E. Educational Grants

Grants may support independent programs for continuing education or community benefit. Pre-approval and documentation are mandatory.

F. Charitable Donations & Political Contributions

These are allowed only when lawful and not tied to improper influence. Donations must not benefit a government official personally or be linked to business decisions.

G. Consulting Arrangements

Government officials may be hired as consultants only when legally permitted, for fair market value, and for services relevant to Celltrion's legitimate business activities. Documentation and approval are required.

6. Prohibition of Facilitation and Extortion Payments

Facilitation payments (small payments to expedite routine actions) are prohibited.

Extortionate payments—made under duress or threats—must be reported immediately to the compliance team. If payment is unavoidable due to safety concerns, post-reporting and documentation are mandatory.

7. Third-Party Risk Management

Celltrion may be held liable for corrupt actions by its third-party partners, including agents, consultants, CROs, or distributors.

Required safeguards include:

- Pre-hire due diligence based on risk
- Avoiding engagements when red flags (e.g., secrecy, offshore payments, “success fees”) exist and cannot be resolved
- Mandatory anti-corruption contract clauses and certifications
- Ongoing monitoring and documentation through third-party logs

Third parties involved in tender processes require special attention and must never engage in bribery to influence government purchasing decisions.

8. Other Safeguards

- Pre-Employment Screening

Sensitive roles (e.g., finance, procurement, business development) require background checks. Hiring former government officials must comply with post-employment restrictions and be supported by clear business rationale.

- Mergers & Acquisitions

All M&A activity must include anti-corruption due diligence, protective clauses in contracts, and involvement of the compliance team in assessing risk.

- Reporting & Whistleblowing

Employees must report suspected misconduct or bribery attempts immediately to the compliance team or via whistleblowing channel (<https://celltrion.integrityline.com>). Anonymous reporting is supported. Retaliation is strictly prohibited.

- Training & Certification

Annual and ad hoc anti-corruption training is required. Employees must certify each year that they understand and comply with the policy.

9. Financial Books and Record Accuracy, and Internal Controls

All payments must be accurately recorded and supported by legitimate documentation. Prohibited practices include:

- Off-book transactions
- False or misleading invoices
- Improper expense claims
- Falsified records by or for third parties

Every Celltrion business unit must follow internal accounting control systems. All financial activities are subject to oversight by the compliance, finance, and audit teams.

To uphold the integrity of our organization and ensure a transparent, ethical environment, we remain steadfast in our commitment to anti-corruption practices.

If you have any questions or concerns, please consult your local compliance team or global compliance team at cp@celltrion.com.