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Anti-Bribery and Corruption Compliance Policy		

POLICY STATEMENT

The World Federation of Hemophilia (together with its subsidiaries and consolidated affiliated entities, collectively the “**WFH**”) is an international charitable and not-for-profit organization dedicated to saving and improving the lives of people with hemophilia and other inherited bleeding disorders. In the context of its activities, WFH receives support (including monetary and drug donations) from third parties (the “**Sponsors**”) and provides funding and other support to recipients, including hemophilia treatment centers and national member organizations (the “**Recipients**”) trusted by WFH.

The WFH is committed to conducting its business and activities based upon best practice ethical standards, in accordance with all applicable laws, rules and regulations where the organization conducts activities. WFH complies fully with the letter and the spirit of all applicable anti-corruption and anti-bribery laws and regulations (all collectively, the “Anti-Corruption Laws”), including where appropriate, the *Corruption of Foreign Public Officials Act* (the “CFPOA”) and the *Criminal Code* (the “Criminal Code”) in Canada, and the *Foreign Corrupt Practices Act of 1977*, as amended (the “FCPA”) in the United States. **WFH strictly prohibits engaging in or tolerating bribery or any other form of corruption.**

1. PURPOSE

The purpose of this Policy is to establish controls to ensure compliance with all applicable Anti-Corruption Laws, and to ensure that WFH’s business is conducted in a socially responsible manner.


This Policy contains information and practical guidance to help individuals who work for and/or act on behalf of WFH comply with Anti-Corruption Laws, and to prevent, detect, and respond to anti-corruption issues when they arise.

2. SCOPE

This Policy applies to the WFH and all its officers, directors, employees, volunteers, members, service providers, dealers and other agents or third parties acting on behalf of WFH.

3. PROHIBITION AGAINST BRIBERY

3.1 This Policy strictly prohibits WFH and its officers, directors, employees, volunteers, members, service providers, dealers and other agents or third parties from offering, promising, authorizing, paying or giving money or anything of value to or for the benefit of any person or entity, including any private person or Public Official, directly or indirectly, to influence official acts or decisions of that person or entity or to secure any improper advantage, whether for the benefit of WFH, its Sponsors or its Recipients.

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(a) What is “Anything of Value”?

3.2 Under this Policy, the term **“anything of value”** is defined broadly to include both financial and other non-financial advantages (non-cash items). Things of value include, for example, cash or cash equivalents (such as gift cards or vouchers), travel, meals, gifts, entertainment, outings, favors (including sexual favors), services, sponsorships, job opportunities, loans and loan guarantees, investment or business opportunities, the use of property or equipment, such as drugs, medication or medical equipment, transportation, and the payment or reimbursement of expenses or debts, even if provided to the relatives or friends of a Public Official or other intended beneficiary.

There is no minimum threshold in determining value. Even small payments or benefits are prohibited if they are intended or operate as bribes or influence any Public Official to take an official act or to give an improper advantage to WFH, a Sponsor or a Recipient.

(b) Who is a “Public Official”?


3.3 Under this Policy, the term **“Public Official”** is defined broadly and includes the following:

- i. Any elected or appointed government official, officer, employee or person acting in an official or public capacity on behalf of a government at any level (national, state, or local) — this includes members of legislative, regulatory, administrative, and judicial bodies, as well as low-level employees of government agencies, such as office workers;
- ii. Any officer or employee of government-owned, government-controlled or affiliated entities;
- iii. Any officer or employee of a public international organization;
- iv. Any person acting in an official capacity for a government, government agency, or state-owned enterprise, even if in an honorary or unpaid position; and
- v. Any political party, official, personnel or representative of a political party; and any candidate for public office (even if not currently in office).

(c) What is an “Improper Advantage”?

3.4 The prohibition of payments or provision of benefits to influence acts or decisions or to secure an improper advantage is defined broadly in this Policy. This includes official or non-official acts or decisions resulting in WFH, a Sponsor or a Recipient being entitled to any type of benefit it is not clearly entitled to. By way of example, improper payments or benefits may not be conveyed to a Public Official:

- To persuade them to prioritize the prescription, supply or administration behaviour of certain drugs or treatments;
- To persuade them to prioritize the processing of a certain approval or authorization request;

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- To prevent enforcement of an applicable law or regulation; or
- To influence the decision to authorize the import of a certain drug or product.

4. ADDITIONAL GUIDANCE

4.1 “Facilitating” or “Grease” Payments

This Policy prohibits all payments to Public Officials to secure an improper advantage, including small payments to speed, expedite or to secure routine government actions, frequently called “grease” or “facilitating” payments.

4.2 Travel, Gifts, Meals, Entertainment and Hospitality

Reasonable, proportionate, and appropriate Gifts, Meals, Entertainment and Hospitality intended to establish goodwill and foster better working relationships are generally an acceptable part of WFH’s business activities. However, in order to protect both WFH and its employees, any Gifts, Meals, Entertainment and Hospitality must have a valid business purpose, be reasonable by local standards, be properly recorded in WFH’s books and records, and include supporting justification documents.

All travel and accommodations where WFH hosts a third party must be in accordance with the WFH Travel Policy (HR 002-A and VLT 002).


4.3 Employee Receipt of Gifts and Hospitality

WFH employees, are prohibited from receiving gifts or hospitality that influence, or could be viewed as influencing, business decisions. Employees are prohibited from receiving anything of value — including meals, entertainment, favors or gifts — if the purpose or appearance of such an item is to improperly influence the employee in his/her work or responsibilities, such as to favor a certain party over another or to direct a certain donation.

Without limiting the generality of the foregoing, employees should not accept gifts if such gifts:

- i. May obligate the recipient in any way;
- ii. May result in any unnecessary or unwanted publicity of WFH;
- iii. May influence WFH or place WFH in a dilemma; or
- iv. Are in the form of cash or cash equivalents.

Additionally, as detailed in WFH’s Employee Agreement Code of Conduct, each employee must report to their supervisor any gifts offered of substantial value (US \$50 or more) and seek their supervisor’s approval prior to receiving such gifts.

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5. RECORD-KEEPING AND FINANCIAL CONTROLS


- 5.1 WFH will be required to develop, implement, monitor and maintain a system of internal accounting controls to facilitate compliance with this Policy, as well as to foster a culture of integrity and maintain high ethical standards throughout the organization.
- 5.2 WFH will keep accurate books and records that fairly and accurately reflect and describe all transactions involving donations and WFH's financial resources, and that all transactions are properly documented and authorized. Any unrecorded transaction with a Public Official, either direct or indirect, is a violation of this Policy.

6. VIOLATIONS AND DISCIPLINARY ACTION

- 6.1 WFH could be subject to serious criminal and civil penalties for violating Anti-Corruption Laws, as well as reputational damage for association with corrupt activities, as well as significant costs associated with investigations of allegations of corrupt activities.
- 6.2 Upon discovering a violation of this Policy, WFH may impose such sanctions as it deems appropriate, including, among other things, a letter of censure or suspension or termination of the employment of the violator, or termination of WFH's agreement with a third-party violator.

7. COMPLIANCE PROCEDURE AND TRAINING

- 7.1 To ensure that all officers, directors, employees, volunteers, members, service providers, dealers and other agents or third parties of WFH are aware of this Policy, a copy of the Policy will be provided to them, and they will be advised that the Policy is available on WFH's website for their review. All will be informed whenever significant changes are made. New officers, directors, employees, volunteers, members, service providers, dealers and other agents or third parties of WFH will be provided with a copy of this Policy and will be educated about its importance.
- 7.2 Training on the compliance goals and requirements of this Policy will form part of the induction process for all new officers, directors, employees, volunteers, members, service providers, dealers and other agents or third parties of WFH. All existing officers, directors, employees, volunteers, members, service providers, dealers and other agents or third parties of WFH will receive relevant training on how to implement and adhere to this Policy.
- 7.3 All officers, directors, employees, volunteers, members, service providers, dealers and other agents or third parties of WFH will provide annual certification of compliance with this Policy by signing an Acknowledgement Form (Appendix A). The signed Acknowledgement Form (hard-copy or an electronic acknowledgement to the same effect)

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must be returned to the WFH Compliance Officer who shall retain record of all such acknowledgements.

8. COMPLIANCE REPORTING CHANNELS

8.1 All officers, directors, employees, volunteers, members, service providers, dealers and other agents or third parties of WFH must comply with the provisions of this Policy, take steps to prevent violation of this Policy, and are encouraged to raise any queries with the WFH Compliance Officer.


8.2 All officers, directors, employees, volunteers, members, service providers, dealers and other agents or third parties of WFH should report any actual or suspected violations of this Policy or Anti-Corruption Laws through any of the following channels:

- i. Employees are encouraged to raise any issue directly with their supervisor, or if an employee has reason to believe that their supervisor is involved or has a conflict of interest, to the Human Resources Manager, the WFH Compliance Officer or to any member of the senior management team;
- ii. Other individuals, agents and third parties can directly contact the appropriate director at WFH, the WFH President, the WFH CEO or the WFH Compliance Officer;
- iii. Directly contact the WFH Compliance Officer; or
- iv. Report issues via WFH's Compliance email (compliance@wfh.org)

Officers, directors, employees, volunteers, members, service providers, dealers and other agents or third parties of WFH may anonymously report any issues through any one of these channels.

8.3 All submitted questions and reports will be treated as confidential to the extent consistent with WFH's ability to conduct a full and fair investigation and to comply with its legal obligations.

8.4 No officer, director, employee, volunteer, member, service provider, dealer and other agent or third party of WFH will suffer demotion, penalty, or other adverse consequences for refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future.

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APPENDIX A

ANTI-BRIBERY AND CORRUPTION COMPLIANCE POLICY ACKNOWLEDGEMENT

I (print name) _____ certify that I have received a copy of the WFH Anti-Bribery and Corruption Compliance Policy (the “Policy”), have read, understand, and agree to follow and comply with the policies and procedures contained therein at all times.

I understand and agree that if I violate this Policy, the WFH may impose such sanctions on me as it deems appropriate, including without limitation a letter of censure, or suspension, or termination of my contract, or termination of my employment.

I further confirm that, I have not violated the provisions of this Policy, and should I learn or have reason to know of any potential violations of the Policy or any applicable laws, I will immediately notify my supervisor or the WFH’s Compliance personnel (as per Article 8.2 of the Policy).

Signed,

Print Name:

Title / Position:

Date:

N.B.: Officers, directors, employees, volunteers, members, service providers, dealers and other agents or third parties of WFH will be required to complete an annual Acknowledgment certification.