

Anti-Bribery & Corruption Policy

Purpose, scope, and responsibility

The Anti-Bribery and Corruption Policy establishes principles that must govern our conduct to reinforce our intention and obligation to act honestly and ethically in all business dealings.

This policy applies to all employees of the COPD Foundation, its consultants and contractors representing or working on behalf of the COPD Foundation.

Policy statement

Bribery and corruption are not only against our organization's values; they are illegal and can expose the employee and the organization to fines and penalties, including imprisonment and reputational damage.

At the COPD Foundation, bribery is never permitted. We will not seek to influence others, either directly or indirectly, by offering, paying, or receiving bribes or kickbacks or by any other means that is considered unethical, illegal, or harmful to our reputation of honesty and integrity. Employees and representatives of the organization are expected to decline any opportunity which would place our ethical principles and reputation at risk. While certain laws apply only to bribes to government officials (domestic and foreign), this policy also applies to non-government business partners.

What are bribery and corruption?

People want to work with organizations they can trust. The COPD Foundation has built a strong reputation for being an ethical, trustworthy organization. Each of us is responsible for protecting that reputation by demonstrating honesty and integrity as we interact with customers, business partners, and each other.

Bribery is offering, giving, or receiving anything of value to induce a person to act or reward a person for having acted. This includes kickbacks—giving payment to someone who helps facilitate a transaction. It's important to understand that a corrupt act has occurred even if:

- A bribe fails.
- A person authorizes or provides direction for a bribe, but no bribe is ultimately offered or paid.
- "Anything of value" includes, but is not limited to:
 - Cash, cash equivalents (such as gift certificates/cards), stock, personal property, and assumption or forgiveness of a debt.
 - Gifts, meals, entertainment, and travel—any corporate travel, gifts, entertainment, and meals must be proportionate to the occasion and comply with the gift & entertainment policy/standards applicable to your location.

Political contributions

Charitable contributions made to a charity at the direct request of a government official or private business partner, could be considered an indirect bribe made to obtain or retain business or to secure other improper business advantages.

Job offers or internship awards to government officials (or their relatives) can present a risk of violating anti-bribery or anti-corruption laws and regulations. Compliance officer (if present) or Human Resources lead must be consulted before making such offers.

Corruption is dishonest or fraudulent conduct, typically involving bribery.

REPORTING AND INVESTIGATING BRIBERY and CORRUPTION

If you believe that you have witnessed conduct that violates this policy, you should immediately report such conduct to your manager, any other company manager or officer, or TriNet. Managers who receive ABAC Policy complaints, learn of or suspect violations of this policy should immediately report them to the designated contact for such complaints at your company or TriNet. Managers who fail to do so may be subject to discipline.

All reports will be investigated promptly, thoroughly, objectively, and as confidentially as possible in a manner that provides all parties with due process and reaches reasonable conclusions based on the evidence collected. All Foundation employees are expected to cooperate fully in any investigation. Upon completion of the investigation, its conclusion will be communicated as soon as practicable. If the investigation substantiates that a policy violation has occurred, your company will take appropriate corrective action, up to and including termination of employment. Your company will also take appropriate action to address violation by contractors or consultants. If it is determined that prohibited conduct has occurred, the appropriate corrective action, up to and including termination of employment of the offending worksite employee or contractors/consultants, will be taken by your company along with any additional steps necessary to prevent further violations of this policy.

Employees and/or Contractors who violate this policy will face disciplinary action that may result in termination of employment.