

 Jazz Pharmaceuticals	NON-GXP POLICY	
Document Number JV-QDOC-105757	Name Anti-Corruption Policy	Version 7.0

Global Policy on Anti-Bribery and Corruption

	<p>What's OK?</p> <p>Do</p> <ul style="list-style-type: none"> • Ensure all goods and services are required by the business and payments are made at fair market value • Record all payments accurately • Work with procurement and the Global Compliance and Ethics Function to manage risk in high risk geographies • Report any concerns you may have
	<p>What's prohibited?</p> <p>Do not:</p> <ul style="list-style-type: none"> • Make payments or give anything of value to third parties to incentivize them to inappropriately carry out their duties • Give anything of value which might appear to sway business decisions. • Carry out activities through third parties which could not be carried out at Jazz. • Give lavish gifts to third parties

Seek help if you have questions or are unclear.

For questions related to this policy, contact the Global Compliance & Ethics I-CARE Team or the Legal Department.

Speak Up! if you have a concern or see a violation of this policy.




Call your Global Compliance & Ethics I-CARE business partner or the Global Speak Up Hotline at 1.800.511.2034 in the U.S. For all other countries, please visit the SpeakUp! Page on JazzCentral



Email: I-CARE@jazzpharma.com



Visit the Speak Up! Page on JazzCentral for resources on reporting a concern

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Anti-Bribery & Anti-Corruption “ABAC”) Policy

Statement of Policy

We don't tolerate corruption or bribery of public officials or private businesses, and we don't provide improper advantages no matter where we are working and no matter the local practice or customs. We comply with international laws prohibiting corruption and bribery that apply to our business. This means that we do not offer or receive anything of value to win or retain business, for an improper business advantage, or personal gain. We expect the same standard from everyone that we do business with, anywhere in the world.

Scope


This policy applies to all employees and directors (“You”) of Jazz and its subsidiaries and affiliates worldwide (“Jazz”) as well as third party agents acting on behalf of Jazz.

Anything of Value

In doing business anywhere in the world, neither You nor any person or entity associated with Jazz, shall offer or accept anything of value in the form of a bribe, kickback, or other illicit payment. “Anything of value” includes, but is not limited to, cash and gifts, job offers, luxury meals, inappropriate or unprofessional business entertainment, travel without substantial business purpose or involving significant leisure time, provision of free goods or services, philanthropic giving, reimbursements, and contributions to a political party or political candidate /individual. It is important to remember that “anything of value” can include things that benefit family members or friends (see also What activities need extra care?).

I – CARE in Action:

- Never offer anything of value to try to sway a business decision.
- Be mindful of how arrangements may be perceived and the timing of the arrangement. Could it appear that Your intention is to sway a business decision? Could the arrangement have this effect?
- Record all payments and transactions accurately.
- Supervise third parties carefully, making our anti-bribery and corruption standards clear. Jazz can be held accountable for the actions of intermediaries, such as agents and consultants.
- Watch for red flags that could indicate improper or illegal actions on the part of our third parties.
- Many HCPs are considered government officials. It can sometimes be difficult to know if someone will be considered a government official. Seek advice from Legal or Global Compliance and Ethics

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No Minimum Threshold

There is no minimum threshold in determining value. Any request by a government official for any type of payment including a donation to a political party or charity must be promptly reported to a member of the Legal or Global Compliance & Ethics functions at

I-CARE@jazzpharma.com (opens in a new tab).

Corrupt Payments through Third Parties Prohibited


Third parties cannot do anything for us that we cannot do directly. Regardless of a third party's citizenship, nationality, or residency, they may not offer or receive anything of value in the form of a bribe, kickback, or other corrupt payment.

When selecting third parties, it is crucial to exercise due diligence and be vigilant for any red flags that may indicate potential corruption or unethical conduct. Work closely with the Procurement and Global Compliance and Ethics departments to evaluate and manage third-party risk. Contact the Global Compliance & Ethics and Legal Departments if you have concerns about improper actions.

Which activities need extra care?

Sometimes even activities not intended to be improper can appear so. Therefore You should take particular care when carrying out the following non exhaustive list of activities:

- Consulting arrangements
- Providing funding to third parties
- Discounts, rebates, or refunds
- Philanthropic giving
- Gifts and/or entertainment
- Publication or authorship
- Job offers to individuals connected with our business
- Use of Jazz resources

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Red Flags

- Doing business in a high-risk country.
- Requests to pay business partners or providers in cash.
- A business partner, supplier or vendor refusing to comply with contractually obligated standards.
- Third parties requesting gifts, entertainment or lavish travel.
- When an HCP is an expert in a different field than for what they have been engaged.

If You Are in Danger

If You are in danger of the loss of life, limb, or liberty from a government official, a payment can be made.

However, the payments must be reported promptly in writing to a member of the Legal or Global Compliance & Ethics functions at [I- CARE@jazzpharma.com](mailto:CARE@jazzpharma.com)[\(opens in a new tab\)](#) and accurately recorded in Jazz's books and records.

Books, Records, and Internal Controls

All payments by Jazz and its third-party agents must be supported by proper documentation, such as receipts and invoices. Books and records must accurately and fairly reflect all

transactions. All transactions must serve a legitimate business purpose and be documented in reasonable detail to maintain internal controls. This allows us to prevent and detect potential violations of Jazz's policies or applicable laws. No false or artificial entries may be made in the books and records for any reason, and all payments and transactions must be recorded accurately and fairly for the goods or services provided. Circumventing Jazz internal controls is prohibited.


Jazz expects that any records provided by You will be accurate and include reasonable detail to understand the nature and reason for the payment. You must completely and accurately record all transactions involving government officials regardless of the amount.

Training and Policy Distribution

You will be required to undergo training regarding our anti-bribery program and this policy upon starting with Jazz and periodically thereafter.

You will receive a copy of this policy and must certify that You:

1. have received and reviewed this policy;
2. agree to abide by the policy; and
3. agree to report any potential violations of this policy.

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Violations of the Jazz Code of Conduct or any Jazz policy may result in corrective actions, and/or disciplinary action, up to and including termination.

Reporting Concerns

If You become aware of a situation or concern that needs to be reported, You should contact a member of the Legal or Global Compliance & Ethics functions at CARE@jazzpharma.com (opens in a new tab). If you are more comfortable, You may report your concern anonymously to the Speak Up helpline.

By Phone:


U.S. - 1.800.511.2034

For all other countries, please visit the [SpeakUp! Page](#) on JazzCentral or our external website.

Online:

Visit the [SpeakUp! Page](#) on Jazz Central or our external website for reporting options at <https://www.jazzpharma.com/our-purpose/ethical-standards/>

All reported issues are reviewed and triaged to the appropriate function for substantiation and/or investigation. Jazz does not tolerate retaliation against anyone for Speaking Up or participating in an investigation.

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Applicable Laws

- All countries where Jazz does business have laws and regulations against bribery and corruption.
- Some apply locally, and others internationally.
- This policy is intended to consider the most strict and wide-spread laws which are applicable to Jazz business worldwide.
- Applicable laws include but are not limited to: the US Foreign Corrupt Practices Act, UK Bribery Act, the UN Convention against Corruption and Italian Anti-Corruption Law.
- See the ABAC page on JazzCentral for more details.

Administration and Review

The Chief Compliance and Ethics Officer, along with the Board of Directors, will review, on a regular basis, the implementation and effectiveness of Jazz's anti-bribery and anti-corruption compliance program. The Global Compliance & Ethics function is responsible for the periodic review and updating of this policy.

If You have any questions, please contact a member of the Legal or Global Compliance & Ethics functions at CARE@jazzpharma.com (opens in a new tab). Directors should consult with the Company's General Counsel, Chief Compliance Officer, or their designees.

Change History

Version	Effective Date	Summary of Changes
3	01 October 2016	<ul style="list-style-type: none"> • Migrated to Reliance
4	15 December 2018	<ul style="list-style-type: none"> • New policy template • Updated Legal & Compliance Department to Legal and Corporate Compliance departments
5	28 January 2019	<ul style="list-style-type: none"> • Updated Legal & Compliance departments to a member of the Legal and Compliance functions.
6	See document watermark	<ul style="list-style-type: none"> • Fixed document headers
7	TBD	<ul style="list-style-type: none"> • Updated to broaden the scope for international anti-corruption and anti-bribery laws, clarify expectations of third parties, and add Speak Up contact information.