

## Questionnaire

The purpose of this Questionnaire is

- To receive from Business Partner information that will enable JSC “R-Pharm” to properly discharge its obligations under the Anti-corruption compliance policy of JSC “R-Pharm;”
- To provide an opportunity for the Business Partner to accept confidential information notification elaborated by JSC “R-Pharm” with the object of showing how this collected personal data will be used.

**Please, note that all the clauses of the Questionnaire are obligatory for filling in, when appropriate, please, specify “Not applicable.”**

For the purpose of this Questionnaire “**Government or Public Official**” means any of the following:

- any government official or officer (including appointed individual or current candidate for) or employee of any other public structure, public institution or government-owned company;
- any individual acting on behalf of the government, public institution or other public agency;
- any current official or officer working in a company fully or partly owned by the government;
- any international civil servant or other person of public international (interstate or inter-governmental) organization (i.e. IMF, UN) which authorized by the organization to act on its behalf;
- current political party servant or official or employee acting on behalf of a political party; or/ and
- current candidate for the position of the political party official.

**Business Partner Questionnaire**  
**To be completed by the Business Partner**

<b>I. Basic Information</b>	
Company Legal Name (Full Name for Individuals): _____	
Company Legal Address: Postal Code _____ Country _____ State, city _____ Street, building, number _____ _____	
Phone _____ Web-site _____	
Company actual address (if different): Postal Code _____ Country _____ State, city _____ Street, building, number _____ _____	
Phone _____ Web-site _____	
<b>II. Primary Contact Information</b>	
Contact Name: _____	
Contact Title: _____ E-Mail _____	
Telephone: Office _____ Mobile _____ Fax _____	
<b>III. Primary Information about Company</b>	
1. Legal Structure of Company (Examples: Limited Liability Company, Open Joint-Stock Company, Joint-Stock Company, Individual Entrepreneur etc.): _____	
Date of Incorporation: _____ Country of Incorporation: _____	
Registration Number (for example, Primary State Registration Number (OGRN)/ Primary State Registration Number of the Individual Entrepreneur (OGRNIP) in the Russian Federation): _____	

OGRN/OGRNIP: \_\_\_\_\_

Taxpayer Identification Number

(TIN): \_\_\_\_\_

2. Does this company do business under any other name?

Yes

No

If yes, please provide the following information:

Company Legal Name (Full Name for Individuals): \_\_\_\_\_

Legal Address: \_\_\_\_\_

**(use a separate sheet of paper, if necessary)**

3. **Specify any Branches, Subsidiaries, Joint Venture Companies, Partnerships and other organizations, in which the Company owns the controlling stake.**

Full Legal Name:

\_\_\_\_\_

Legal Address: \_\_\_\_\_

Relationship to the Company (branch, subsidiary, partnership, other):

\_\_\_\_\_

**(use a separate sheet of paper, if necessary)**

4. **The expected nature of cooperation with JSC "R-Pharm":**

Public procurement tenders

Trading activities (import, export, wholesale, retail, etc.)

Representation of interests / counselling

Sales activities on behalf of JSC "R-Pharm" name (middleman, sales agent, etc.)

Professional / pre-clinical and / or clinical research

Other (specify):

\_\_\_\_\_

**5. Key personnel**

Please provide the list of Key personnel of the company (founders, shareholders, official and senior managers, chief accountant, Board members, other) (use a separate sheet of paper, if necessary)

Person's Full Name	Person's Position in the Company	Comments (if any)

If necessary, please, enclose an extract from the register of shareholders or a link to this register.

**5.1 Are there any Government or Public Officials<sup>6</sup> among the key personnel of the Company?**

YES/NO

If NO proceed to clause 8. If YES, please, specify full name, position and give detailed explanation why this employee is considered a Government or Public Official.

Person's Full Name	Status/position in the Company	Information in the context position / status of the Government or Public Official

<sup>6</sup> The definition of the term "Government or Public Official" is given on the first sheet of the Questionnaire.

6. Does the key personnel specified in clause 5 and the persons specified in clause 5.1 have the power to make decisions or otherwise influence JSC "R-Pharm" activity in virtue of their power of the Government or Public Official in relation of the following:

- State regulation of prices for the medicines from the list of vital and essential medicines, including the range of products of JSC "R-Pharm."
- Inclusion of JSC "R-Pharm" products into the official lists, and / or standards of treatment
- Purchase of JSC "R-Pharm" products for companies, institutions, agencies and international organizations, etc. (ex., the World Health Organization)
- Approval, issuance of registration of permits, licenses or other authorization documents for JSC "R-Pharm" products
- Other types of registration, authorization or approval relating to JSC "R-Pharm" commercial interests
- Other (please, specify)
- None of the above

If yes, please, specify the name of the key employee (if applicable)

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**7. Business Size**

Please provide the information about Company's annual sales for the last 3 years (including currency)

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**8. Measures for the corruption prevention**

Which preventive measures according to the Art. 13.3 of the Federal Law No. 273 "On Counteracting Corruption" exist in your Company?

- Department or Officer (Name \_\_\_\_\_), responsible for the corruption prevention and other offenses;
- Standards and procedures designed to ensure fair work of your Company
- Code of Ethics and Conduct
- Standards and procedures designed to prevent and to resolve conflicts of interests
- Standards and procedures designed to prevent unofficial bookkeeping and using of forged documents

**Please attach copies of relevant standards and procedures (if applicable)**

**9. Foreign-economic activity**

a) Please provide the list of Countries where your Company has business:

\_\_\_\_\_

b) Please provide the list of Countries where your Company is planning to work with JSC "R-Pharm" (if different from paragraph a)

\_\_\_\_\_

10. Do you confirm that your Company has no debts to the budget, and there is no liquidation, or bankruptcy procedure in relation to your Company?

Yes

No

If no, please, specify

\_\_\_\_\_

**IV. References**

Please provide the names of two (2) business associates which JSC "R-Pharm" may contact as a reference:

**Reference #1**

Reference Company Legal Name:

\_\_\_\_\_

Reference Company Legal Address:

Postal Code \_\_\_\_\_

Country \_\_\_\_\_

State, city \_\_\_\_\_

Street, building, number \_\_\_\_\_

\_\_\_\_\_

Phone \_\_\_\_\_

Web-site \_\_\_\_\_

Contact Name: \_\_\_\_\_

Contact Title: \_\_\_\_\_ E-Mail \_\_\_\_\_

Telephone: Office \_\_\_\_\_ Mobile \_\_\_\_\_ Fax \_\_\_\_\_

**Reference #2**

Reference Company Legal Name:

\_\_\_\_\_

Reference Company Legal Address:

Postal Code \_\_\_\_\_

Country \_\_\_\_\_

State, city \_\_\_\_\_

Street, building, number \_\_\_\_\_

Phone \_\_\_\_\_

Web-site \_\_\_\_\_

Contact Name: \_\_\_\_\_

Contact Title: \_\_\_\_\_ E-Mail \_\_\_\_\_

Telephone: Office \_\_\_\_\_ Mobile \_\_\_\_\_ Fax \_\_\_\_\_

**V. Subcontracting**

Are you going to hire contractors/subcontractors to perform work for CJSC "R-Pharm"?

Yes (fill in items 1-7)  No (go to Section VI)

1. Will contractor/subcontractor interact with health care professionals or Government or Public Officials on behalf of JSC "R-Pharm"?

Yes  No

If yes, please, give details:

\_\_\_\_\_

2. \_\_\_\_\_

**VI. Penalties, investigations, suspensions or disqualifications**

1. Were any of the key personnel (clause 5) of your Company involved in any criminal investigation or any of the key personnel (clause 5) deprived of rights and/ or temporary dismissed from his/her post due to bribery, money laundering, fraud or other offences/crimes within the past five years?

Yes  No

If yes, please, specify:

\_\_\_\_\_

**VII. Participation of Business Partner/ affiliates in court proceedings**

1. Did your Company/ affiliates participate in court proceedings within the past three years?

Yes  No

If yes, please, specify (if there is not enough space, use a separate sheet of paper with the list of current court proceedings):

\_\_\_\_\_

VIII. Observance of the JSC "R-Pharm" Compliance Policy

Do you agree to conclude a supply contract with JSC "R-Pharm" in accordance with the established form (Appendices to the Commercial Policy), which includes the following provisions on combating corruption?

1. Requirements ensuring the observance of the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and other applicable anti-corruption laws by the Business Partner.<sup>7</sup>

Yes       No

If no, please, specify:

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2. Right of JSC "R-Pharm" to unilaterally withdraw from the contract due to the Business Partner's violation of the anti-corruption law including requirements ensuring that Company observes the U.S. Foreign Corrupt Practices Act, the UK Bribery Act.

Yes       No

If no, please, specify:

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3. Right of JSC "R-Pharm" to audit documents related to Business Partner's activities in the framework of cooperation with JSC "R-Pharm."<sup>8</sup>

Yes       No

If no, please, specify:

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4. Obligation for employees involved in cooperation with JSC "R-Pharm" to be trained by JSC "R-Pharm" as to anti-corruption measures.<sup>9</sup>

Yes       No

If no, please, specify:

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<sup>7</sup> Since JSC "R-Pharm" is an international company and also operates in the USA, it falls under the FCPA (the US Foreign Corrupt Practices Act) and the UK Bribery Act, which have extraterritorial effect. In addition, JSC "R-Pharm" cooperates with a number of the world's largest companies that conduct their business in strict compliance with this legislation, which requires strict observance of its provisions not only by JSC "R-Pharm," but also by all its business partners. Thus, companies subject to this legislation must not create a risk of non-compliance with its requirements.

<sup>8</sup> The audit is the audit of operations, systems, procedures, accounting and other documents of the Business Partner to the extent that this relates to the fulfilment of the obligations of the Business Partner under the Contract with JSC "R-Pharm". Please, note that the right of JSC "R-Pharm" to conduct an audit is stipulated in the approved form of the contract, which can be found at <http://www.r-pharm.com/ru/>, "Commercial Policy" tab.

<sup>9</sup> Free extra-mural training is conducted for the managers and key personnel of the organization in the form of sending training materials for self-study followed by the list of persons who have read the materials.



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**IX. Business Partner's consent**

**I hereby certify:**

- That I am a duly authorized representative of the Company named below (Potential Business Partner or Business Partner);
- That the information I have provided is true and complete to the best of my knowledge on the date of Questionnaire delivery to JSC "R-Pharm;

In connection with Potential Business Partner or Business Partner potential cooperation with JSC "R-Pharm", no officer, director, owner, employee, agent or representative of the Company ("Representatives") has given or will give or attempt to give anything of value to a Government or Public Official, political party or candidate for political office, or any other individual or entity, directly or indirectly for the purpose of obtaining or retaining any business or gaining any improper advantage. Potential Business Partner or Business Partner hereby confirms that he received the Code of Business Ethics and the Anti-corruption Compliance Policy of JSC "R-Pharm," read them and had its Representatives read them and that it and its Representatives will follow the Code of Business Ethics and the Anti-corruption Compliance Policy of JSC "R-Pharm."

**Signature**

**Date**

\_\_\_\_\_  
**Typed or Printed Name**

\_\_\_\_\_  
**Title**

\_\_\_\_\_  
**Company Name**