

UDG Healthcare Compliance Policy

October 2016

Our Commitment to Compliance

Our vision and values are underpinned by our desire to maintain the highest ethical standards in everything that we do. This is why we are also committed to always meeting our legal and regulatory obligations. In this policy we set out the system we have adopted to help ensure that together we can meet this commitment.

Our Group Compliance Policy

Aims of this policy

The aim of this policy is to describe the compliance management system we have adopted to ensure that we meet our fundamental compliance commitments, which are to:

- maintain the highest ethical standards in everything that we do

- always meet our legal and regulatory obligations
- continually improve our compliance management systems

Scope

The Compliance Management System described in this policy applies to all the businesses and functions across the entire UDG Healthcare group.

What is compliance?

Compliance is meeting our ethical, legal and regulatory commitments.

Responsibility for Compliance

We all have an equal responsibility for compliance and ensuring that our commitments are met. However, we have defined the specific role of the Board, management and employees.



The role of the Board of UDG Healthcare

In addition to establishing our commitment to compliance and mandating the compliance management system and its objectives, the Board is responsible for:

- ensuring adequate and appropriate resources are allocated to the compliance management system
- overseeing the effective implementation and performance of the compliance management system and the attainment of our compliance commitments and
- reviewing our compliance management system to ensure its continued suitability, adequacy and effectiveness



The role of management

Everyone with managerial responsibility (regardless of seniority) has accountability for compliance within their area of responsibility. Managers must:

- co-operate with and support (and ensure their area of responsibility co-operates with and supports) the compliance policy and its aims
- comply with, and ensure their teams compliance with, our Code of Conduct and all other compliance policies, procedures, processes and required training
- identify and communicate compliance risks in their business or functional operation
- role model and reward compliance led behaviour



The role of individuals

All employees, managers and directors (regardless of seniority) are equally accountable for their own actions and must:

- comply with our Code of Conduct and all other compliance policies, procedure and processes
- participate in the training that they are required to complete
- use the compliance resources that we make available
- report compliance concerns, issues and failures

All of the Policies and Guidelines that form part of the UDG Healthcare Compliance Framework are posted onto Greenhouse. This resource is available to UDG Healthcare employees in all business units.