



## Healthcare Compliance Anti-Bribery, Anti-Corruption, Anti-Trust and Fair Competition Policy

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## 1. Introduction.

**Sagility Operations Inc., its parent companies, affiliates, and subsidiaries; and its employees, agents, contractors, vendors, officers, and board members (the “Company” or “Sagility”)** are guided by its values. These values are the foundation of how it conducts itself and interacts internally and with its clients, suppliers, investors, and other stakeholders. The Company is committed to ensuring corporate compliance and promoting an ethical corporate culture by observing the highest standards of fair dealing, honesty, and integrity in its business activities.

## 2. Purpose.

- 2.1 This Anti-Bribery, Anti-Corruption, Anti-Trust and Fair Competition Policy (the “policy”) emphasizes Sagility’s zero tolerance approach to bribery and corruption. It establishes the principles with respect to applicable Anti-Bribery, Anti-Corruption, Anti-Trust and Fair Competition laws.
- 2.2 This policy provides information and guidance on how to recognize and deal with bribery and corruption issues.
- 2.3 This policy guides all Sagility individuals and entities to act professionally, fairly and with utmost integrity in all business dealings and relationships, wherever it operates.

## 3. Governance.

- 3.1 The Compliance Department of Sagility and compliance personnel in all locations where the operations of the Company occur shall undertake periodic review and update this policy to reflect applicable law(s) and /or latest notifications released by the regulating authorities from time to time.
- 3.2 Any changes to this policy shall be tracked and documented for future reference and all changes shall be performed by the Sagility Compliance Department only after prior approval of the Global General Counsel, Global Chief Financial Officer, and Global Chief Administrative Officer.
- 3.3 The Sagility Compliance Department shall monitor the effectiveness and review the implementation of the compliance principles set forth in this policy, regularly considering its suitability, adequacy, and effectiveness.
- 3.4 Sagility is responsible for the successful implementation of the principles set forth in this policy and should ensure it is implemented and followed in such a manner as to disclose any suspected violation or wrongdoing.
- 3.5 Any violation of this policy may have significant consequences, including contract termination, removal, prosecution, fines, and other penalties for improper conduct, as well as imprisonment and/or disciplinary action up to and including termination of the violator.

## 4. Scope and Applicability.

The principles set forth in this policy are applicable to Sagility. It is, therefore, the responsibility of Sagility to follow and adhere to all elements described in this policy. In countries where there are more stringent applicable laws, regulations, or industry codes, Sagility requires compliance with the most restrictive requirements and the principles set out in this policy shall be superseded by applicable laws and regulations in those specific countries.

## 5. Distribution and Control of this Document.

Document Owner	–	Sagility Compliance Department
Read Access	–	All employees of Sagility
	–	Web Version will be made accessible to the public through the Company website
Write Access	–	Sagility Legal and Compliance Departments
Revision	–	As and when changes to laws or regulation occur
Review	–	Annual from the last revision date and in the sole discretion of Sagility

## 6. Policy Framework Anti-Bribery and Anti-Corruption.

### 6.1 Bribe, Facilitation Payments and Kickbacks.

- 6.1.1 Sagility prohibits all direct and indirect forms of bribery and corruption including but not limited to interaction with Government Officials or the private sector and including all Sagility persons or entities.
- 6.1.2 Sagility shall conduct its business lawfully and ethically and expects everyone associated with it to conduct business with integrity, regardless of the existence of local customs or traditions, and avoid conduct or behaviour that may have the appearance of impropriety.
- 6.1.3 No Sagility person or entity shall directly or indirectly offer or pay, or authorize an offer or payment, of money or anything of value to a Government Official, Healthcare Professional, or other person or entity (including in the private sector), which is intended to influence the judgment of the recipient in exercising his or her job responsibilities, or intended to secure preferential treatment or an improper advantage for Sagility, or intended as gratification for the recipient having made a decision or acted in a way that benefits Sagility.
- 6.1.4 No Sagility person or entity shall directly or indirectly request or accept any money or item of value, which is intended to influence his/her/its judgment or conduct in his/her/its job responsibilities or intended as gratification for a decision or act in a way that benefits the person or entity giving the item of value.
- 6.1.5 Sagility shall not make or accept Facilitation Payments or Kickbacks of any kind. Sagility shall avoid any activity that may lead to or suggest that a Facilitation Payment or Kickback will be made or accepted by Sagility.
- 6.1.6 If any Sagility person or entity is asked to make a payment on behalf of Sagility, he or she should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. Sagility persons and entities should always ask for a receipt that details the reason for the payment. In case of any suspicion, concern, or query regarding a payment, the same should be promptly reported to a member of the Sagility Compliance or Legal Department.
- 6.1.7 The following are examples of improper conduct which are prohibited by Sagility: 1.) The offering of tickets to a client or potential client to a sporting event in exchange for a promise to do business with Sagility. (This example is a violation of this policy because the offeror is making the offer to gain a commercial and contractual advantage. Sagility may also be found to have committed an offense because the offer has been made to obtain business. It may also be an offense for the potential client to accept such offer.) 2.) A vendor or potential vendor offers to give a Sagility family member a job in exchange for a promise to exert influence or position with Sagility. It is an offense for a vendor to make such offer. It is also an offense for Sagility to accept such offer.
- 6.1.8 The observation of conduct or behaviour of any person or entity of Sagility which may amount to a Bribe, Facilitation Payment, or Kickback must be promptly reported to the Sagility Legal or Compliance Department or in accordance with the Sagility Whistleblower policy.

### 6.2 Government Officials (GO) and Potentially Influencing Government Officials (PIGO).

- 6.2.1 Sagility will conduct operations and activities in compliance with applicable anti-bribery and anti-corruption laws, which prohibit improper or unethical payments to Government Officials. Any payment or benefit conveyed to a GO must be fully transparent, properly documented, and accounted for.
- 6.2.2 Sagility imposes special requirements, including determination as to whether a Government Official is a PIGO, and if so, additional evaluation and approvals are required. Additional data may also be needed when a transaction is proposed with a PIGO.
- 6.2.3 Examples of decisions made by PIGOs include but are not limited to: approval of product registration or licenses or marketing authorizations; approval of pricing or reimbursement of a product; awarding public tenders for government sales or contracts including products within drug or product formularies or rotation schedules; recommendations for any drug to be included in government sponsored programs; granting licenses or permits required to operate or conduct business (i.e., by regulatory agencies).

- 6.2.4 The observation of conduct or behaviour of any person or entity of Sagility which may constitute wrongfully or potentially wrongfully influencing of Government Officials should be promptly reported to the Sagility Compliance or Legal Department.

### **6.3 Dealing with cross-border transactions with Government Officials (GO) and Health Care Professionals (HCPs).**

When engaging in a cross-border transaction, unless otherwise specified in this policy, Sagility must ensure compliance with local laws in the GO or HCP's home country. The interaction or transaction also must be in compliance with local laws and regulations in the applicable jurisdiction and in the country where the interaction or transaction is reasonably expected to occur. If there are questions, consult with the Sagility Legal or Compliance Departments.

### **6.4 Gifts, Hospitality and Entertainment.**

- 6.4.1 Sagility acknowledges that the exchange of nominal gifts and sharing of entertainment is customary in many parts of the world during national, cultural, and religious occasions.
- 6.4.2 The giving or receipt of reasonable gifts by Sagility is not prohibited, if the following requirements are met: There must always be a legitimate business purpose and no quid pro quo to support gifts related expenses; customary gifts, meals, entertainment, travel, or lodging may never be given or received in return for a favor or favorable treatment or to refrain from doing something; it complies with all applicable Anti-bribery and Anti-corruption laws; it is given under the brand name of Sagility, and not in the name of an individual; it does not include cash or a cash equivalent (such as gift certificates or vouchers); considering the reason and nature of the gift, it is of an appropriate type and value and given at an appropriate time; and it is given openly, not secretly. Gifts should not be offered to, or accepted from, GO or representatives, politicians or political parties without seeking an opinion of the Sagility Legal or Compliance Department.
- 6.4.3 The test to be applied is whether in all the circumstances the gift, hospitality and entertainment is modest, reasonable, and not viewed as lavish regardless of actual monetary value and justifiable.
- 6.4.4 Sagility may not accept gifts in cash or kind, except owing to the customary practices followed by any third party. Sagility individuals and entities must exercise appropriate judgment in identifying inappropriate, frequent, or material gifts or entertainment and shall avoid the same in order to maintain integrity and independence.
- 6.4.5 This policy is not intended to prohibit normal and appropriate hospitality (offered and received) to or from third parties. Hospitality limited to meals, drinks and other such sustenance may be offered without prior approval if it is reasonable and justifiable in all the circumstances, taking into account reason and nature, appropriate type, value, given at an appropriate time and not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favour or benefit.
- 6.4.6 Hospitality involving attendance at sporting events or private boxes at sporting events should not be offered or accepted without seeking the prior opinion of the Sagility Legal or Compliance Department.
- 6.4.7 It is recognized that in relation to gifts and hospitality referred to above, what is considered acceptable will vary from country to country and from region to region. What may be normal and acceptable in one location or region may not be in another. There are laws and regulations in certain jurisdictions and locations that place limitations on the value of gifts and hospitality in business transactions and relationships. Questions regarding the propriety of giving or receiving gifts or hospitality should be directed to the Sagility Legal or Compliance Department.
- 6.4.8 If a Sagility individual or entity receives or offers a hospitality or gift, it should be declared via a written record for review by the Sagility Legal or Compliance Department on a form prescribed by such Department.

## 6.5 Extortion.

- 6.5.1 When a payment is extorted or attempted to be extorted by an imminent threat to a Sagility or Sagility family member(s), the demanded payment may be satisfied if the safety of a person or persons is at issue. However, once the immediacy of the situation has been resolved, the payment and circumstances surrounding such payment must be reported to the Sagility Legal or Compliance Department. Any such payment must always be accurately and completely recorded in Sagility's books and records.
- 6.5.2 Sagility persons and entities will not be in breach of this policy if a payment is made for reasons of personal safety and security. Where possible any such payment should only be made after consultation with the Sagility Legal or Compliance Department. Where not possible, such payment shall be immediately reported when the immediate threat of harm is removed.

## 6.6 Donation.

Sagility may make charitable donations if they are legal and ethical under local laws and practices. No donation may be offered or made without seeking the prior opinion of the Sagility Legal or Compliance Department and without approval of the Group CEO or Group CFO. Sagility individuals or entities may, in their personal capacity, make donations that are legal and ethical under local laws and practices. It is recommended that all such donations or contributions are documented with a receipt.

## 6.7 Business Partners.

- 6.7.1 It is understood that various applicable anti-corruption and anti-bribery laws may make Sagility responsible for the acts of third parties. Therefore, no third party, actually or claiming to act on behalf of Sagility may engage in any act that may be construed as bribery or corruption, whether using Sagility funds or personal funds, or whether acting directly or through a third party. Sagility requires any person or entity acting on its behalf to abide by its Sagility Code of Conduct, its policies and standards of ethics and integrity and, where necessary and appropriate, to follow its procedures.
- 6.7.2 While engaging with Business Partners, Sagility will ensure compliance with this policy.
- 6.7.3 If Sagility becomes aware that a Business Partner is engaged in bribery or corruption, such Sagility person or entity should immediately report such concern following the procedure set out in the Sagility Whistleblower Policy.

## 7. Policy Framework – Anti Trust and Fair Competition.

### 7.1 Dealing with Competitors.

- 7.1.1 In today's marketplace, competitors interact in many ways, through trade associations, professional groups, joint ventures, standard setting organizations, and other industry groups. Sagility encourages such dealings, provided they are fair, ethical, and transparent in nature.
- 7.1.2 Sagility must be aware of antitrust risks in its interactions with competitors and must maintain caution at all the times during its dealings with competitors.
- 7.1.3 It is the intent of Sagility to ensure that no collaboration with competitors violates anti-trust or anti-competition laws.
- 7.1.4 Sagility individuals and entities are prohibited from engaging in price fixing activities with any competitor(s) or supplier(s). Sagility will establish prices and other terms on its own, without agreeing with a competitor.
- 7.1.5 Price fixing activities do not relate only to prices, but also to other terms and conditions that affect prices to consumers, and therefore, Sagility should not disclose any such information to its competitors. This price fixing prohibition includes, but is not limited to:
- Present or future prices
  - Warranties
  - Pricing policies
  - Promotions
  - Capacity
  - Terms and conditions in the Contract for Services, including credit terms

- Discounts
- 7.1.6 Competitive information or intelligence, must only be collected through legal and ethical means such as published news, press releases, or information available in the public domain. Unethical or illegal methods to collect information or intelligence to gain an advantage in the marketplace is prohibited by Sagility.
- 7.1.7 If Sagility receives unauthorized or confidential information about a competitor, Sagility must not use such information and the person or entity receiving such information shall notify the Sagility Legal or Compliance Department immediately or proceed in accordance with the Sagility Whistleblower Policy.
- 7.1.8 Sagility must never coordinate or collude with competitors by discussing bid amounts for winning contracts. Such prices or bid amount must always be kept confidential.
- 7.1.9 Bid rigging can take many forms, but one frequent form is when competitors agree in advance which firm will win a bid. Participation by Sagility in bid rigging activities is prohibited.
- 7.1.10 Sagility may never coordinate with or direct a competitor to not undertake business with a specific or targeted individual, organization, or entity.

## 7.2 Dealing with Suppliers.

- 7.2.1 The anti-trust laws also affect a variety of relationships and those involving organizations at different levels of the supply chain including but not limited to suppliers, logistics providers, third parties, and business partners.
- 7.2.2 Sagility encourages relationships with suppliers, contractors, vendors, and third parties undertaken with an intent to reduce cost or promote efficiencies, to the extent they do not violate this policy.
- 7.2.3 Sagility will not enter any formal or informal agreements, with suppliers or business partners, if the agreement prohibits or appears to prohibit the sale of Sagility services to certain sections or types of customers, or violates laws or regulations prohibiting discrimination.
- 7.2.4 Sagility will refrain from vertical arrangements with suppliers if such vertical arrangement reduces competition among organizations at the same level or prevents new organizations from entering the market.
- 7.2.5 Sagility will not impose price or non-price restraints up or down the supply chain in such a manner as to violate or potentially violate applicable anti-trust laws.
- 7.2.6 Sagility has a right to choose its Business Partners. As permitted by applicable laws, Sagility may enter into exclusive contracts with its Business Partners. However, Sagility will refrain from anti-competitive arrangements or agreements.

## 7.3 Mergers and Acquisitions.

- 7.3.1 Mergers may benefit competition and consumers by allowing organizations to operate more efficiently.
- 7.3.2 While exploring merger or acquisition transactions, Sagility shall ensure that all requirements of anti-trust and competition laws and regulations in all applicable jurisdictions and locations are fully complied with. Sagility shall make necessary disclosures as mandated by applicable laws and regulatory authorities while entering mergers or acquisitions.
- 7.3.3 Sagility discourages merger or acquisition transactions when the effect will materially lessen competition, or that tend to create a monopoly in the marketplace without the guidance of external counsel and appropriate governance approvals.

The principles provided above are an indicative list and not an exhaustive list of all possible scenarios which may result in violation(s) of applicable anti-trust or anti-competition laws. Sagility involvement in business practices which are in contravention of applicable anticompetition or antitrust laws or regulations are prohibited by Sagility.

## 8. Books, Records, and Internal Controls.

- 8.1 Sagility is required to maintain accurate books and records and to maintain internal controls to prevent and detect potential violations of its policies or of applicable laws and regulations. Internal controls are processes that monitor compliance with Sagility's policies. Sagility will maintain appropriate controls to

ensure that diligence is conducted, transactions properly approved, documentation received to support expenses, and interactions handled as required by its policies. Sagility will also implement and maintain proactive reviews, audits, and internal investigations to further monitor compliance and to identify potential violations of its policies, applicable laws and regulations.

- 8.2 Sagility will ensure that its payments and transactions regardless of value, are recorded accurately with appropriate documentation. For example, in connection with every transaction, Sagility will ensure that all required pre-approval forms, questionnaires, self- assessments, agreements with Business Partners and expense reports, with supporting documents, are maintained and recorded properly. These requirements also apply to every expense regulated by this policy, such as Gifts, meals, travel, or other permitted expense.
- 8.3 Sagility should err on the side of including more information about a transaction or an expense, rather than less. The goal is to ensure that Sagility books, records and accounts accurately and fairly reflect its transactions in reasonable detail. Transparency and completeness in its records help demonstrate its compliance with this policy and with applicable laws and regulations. For example, submitting an expense voucher for a meal and failing to note that Government Officials attended the meal, may be viewed as creating an inaccurate corporate record. Creating a paper trail through emails or other documents after an expense was incurred to give the appearance that the expense was pre-approved also may be viewed as creating an inaccurate corporate record or falsifying documents.
- 8.4 If a Sagility person or entity realizes that it mistakenly failed to provide complete information about a transaction or expense, the person or entity must escalate it to the applicable supervisor, or to the Sagility Legal or Compliance Department. Trying to hide a mistake or the falsifying of records is prohibited by this policy. Sagility individuals and entities are expected to be open and honest about mistakes or errors and work transparently with the appropriate Sagility representative(s) to try to correct or mitigate any such incident. If Sagility becomes aware that its books and records do not accurately reflect a transaction or expense, the Sagility person or entity with such knowledge must report the issue immediately to an immediate supervisor, the Sagility Legal or Compliance Department, or pursuant the Sagility Whistleblower Policy.
- 8.5 Records and documents generated in connection with the principles set forth in this policy, including, but not limited to diligence files and contracting documents must be maintained and stored for the period specified in the applicable data or document retention or destruction policy.

## 9. Raising a Concern and Protection.

- 9.1 Sagility persons and entities are encouraged to raise concerns about any issue or suspicion of a violation of this policy at the earliest possible stage. If a Sagility person or entity is unsure whether an act, behaviour, or conduct constitutes bribery, corruption, kickback, or other malfeasance; or a Sagility person or entity has other queries, such information must be reported to the Sagility Legal or Compliance Department, or pursuant the Sagility Whistleblower Policy.
- 9.2 A Sagility person or entity who refuses to accept or offer a bribe, or who raises concerns or reports another's wrongdoing, may be worried about possible repercussions. It is the stated objective of Sagility to encourage openness and transparency and it will support persons or entities who raise genuine concerns in good faith in accordance with this policy, even if such person or entity is mistaken.
- 9.3 Sagility prohibits detrimental or retaliatory treatment of a person or entity who reports in good faith in accordance with this policy. Detrimental or retaliatory treatment may include, but is not limited to dismissal from employment, disciplinary action, threats, termination of contract or other unfavourable treatment arising out of such reporting. If any Sagility person or entity believes that it has suffered any such treatment, the Sagility Legal or Compliance Department should be informed. If the matter is not resolved to the satisfaction of the complainant, the matter should be escalated to a Sagility executive or reported in accordance with the Sagility Whistleblower Policy.

## 10. Exceptions.

Exceptions to this policy must be approved by the Group Chief Executive Officer, Global General Counsel, or Global Chief Finance Officer.

**11. Definitions:**

Terms	Definition
<b>Business Partner</b>	Business Partner is a collective term used for consultants, vendors, contractors, agents, intermediaries, API manufacturers and employees of such third parties with whom Sagility Entities enter into contract(s).
<b>Sagility Entities</b>	Sagility Entities is a collective term for Sagility Operations Inc. and its subsidiary entities and affiliates in the US and its affiliates across the globe.
<b>Bribery</b>	"Bribery" means the offering, promising, giving, receiving, soliciting, or accepting of a financial or other advantage, or any other thing of value, with the intention of influencing or rewarding the behavior of a person in a position of trust to perform a public, commercial or legal function to obtain or retain a commercial advantage. Bribery includes any attempt to do any of the foregoing. Bribes are payments made in the form of money or anything of value in return for a business favor or advantage. Bribery also includes laws and regulations defining bribery in the applicable jurisdiction.
<b>Government Officials</b>	<ul style="list-style-type: none"> <li>I. Government Official means any of the following:</li> <li>II. Official (elected, appointed, or career) or associate of a federal, national, state, provincial, local, or municipal government (or federal) or any department, agency, or subdivision thereof.</li> <li>III. Officer or Associate of a federal-owned or controlled enterprise or an organization (e.g., a Health Care Professional practicing at a federal-owned or controlled hospital or clinic).</li> <li>IV. Officer or Associate of a public international organization (e.g., UN, World Bank, EU, WTO, NATO).</li> <li>V. Individual acting for or representing a governmental entity or any of the organizations referred to above, even if he/she/it may not be an associate of such governmental entity or organization.</li> <li>VI. In many countries, physicians who serve as consultants or scientists, participating in clinical trials, may be employed by or contracting with public institutions and thus considered Government Officials.</li> <li>VII. HCPs who are employed by, teach at, or have privileges at a government hospital or public university are Government Officials even if they only work part-time.</li> <li>VIII. An individual who is considered to be a Government Official under applicable local law. In many countries, particularly those in which the Government owns or controls many healthcare providers or pharmacies, virtually all HCPs may be considered Government Officials under the applicable anti-bribery and anti-corruption Laws.</li> <li>IX. Candidate for political office.</li> <li>X. Official of a political party.</li> <li>XI. Family member of any of the Government Officials described in this definition.</li> </ul>
<b>Healthcare Professionals</b>	Health Care Professional ("HCP") means a member of the medical, dental, pharmacy, or nursing professions and any other persons who, in the course of their professional activity, are qualified or permitted to prescribe, supply, administer, purchase, recommend, reimburse, pay for, or acquire a medicine, or influence or authorize any of the foregoing. The term also includes health service managers and administrative or clinical support staff who provide support to HCPs, and employees and agents of any entity that is owned by or comprised of HCPs. Examples of Health Care Professionals are physicians, nurses, medical assistants, pharmacists, paramedics, product formulary committee members, clinical investigators, and public and private hospital Associates.
<b>Facilitation Payments</b>	Facilitation payments are unofficial payments made to secure or expedite a routine government action by a government official.
<b>Kickback</b>	A Kickback is typically a payment made in return for a business favor or advantage. Kickback also includes any similar conduct or behavior prohibited by law or regulation in the applicable jurisdiction.

<p><b>Potentially Influencing Government Official (“PIGO”)</b></p>	<p>A Potentially Influencing Government Official (“PIGO”) is an individual who is either connected to a Key Decision-Making Entity (“KDME”) as a member of its management or governance body, as an associate, or as a consultant, or in a position where he/she/it could make a decision that will significantly impact Sagility’s business, other than, if applicable, merely as a practicing HCP.</p>
<p><b>Cross Border Transactions</b></p>	<p>Cross-border transactions are any interactions or transactions involving a Government Official or HCP where: a Sagility person or entity in a country other than the home country of the Government Official or HCP, or the interaction or transaction is reasonably expected to occur in a country other than the home country of the Government Official or HCP.</p>

**12. Glossary:**

Acronym	Full form
FCPA	Foreign Corrupt Practices Act
GOs	Government Officials
HCPs	Health Care Professionals
KDMEs	Key Decision-Making Entities
PIGO	Potentially Influencing Government Official