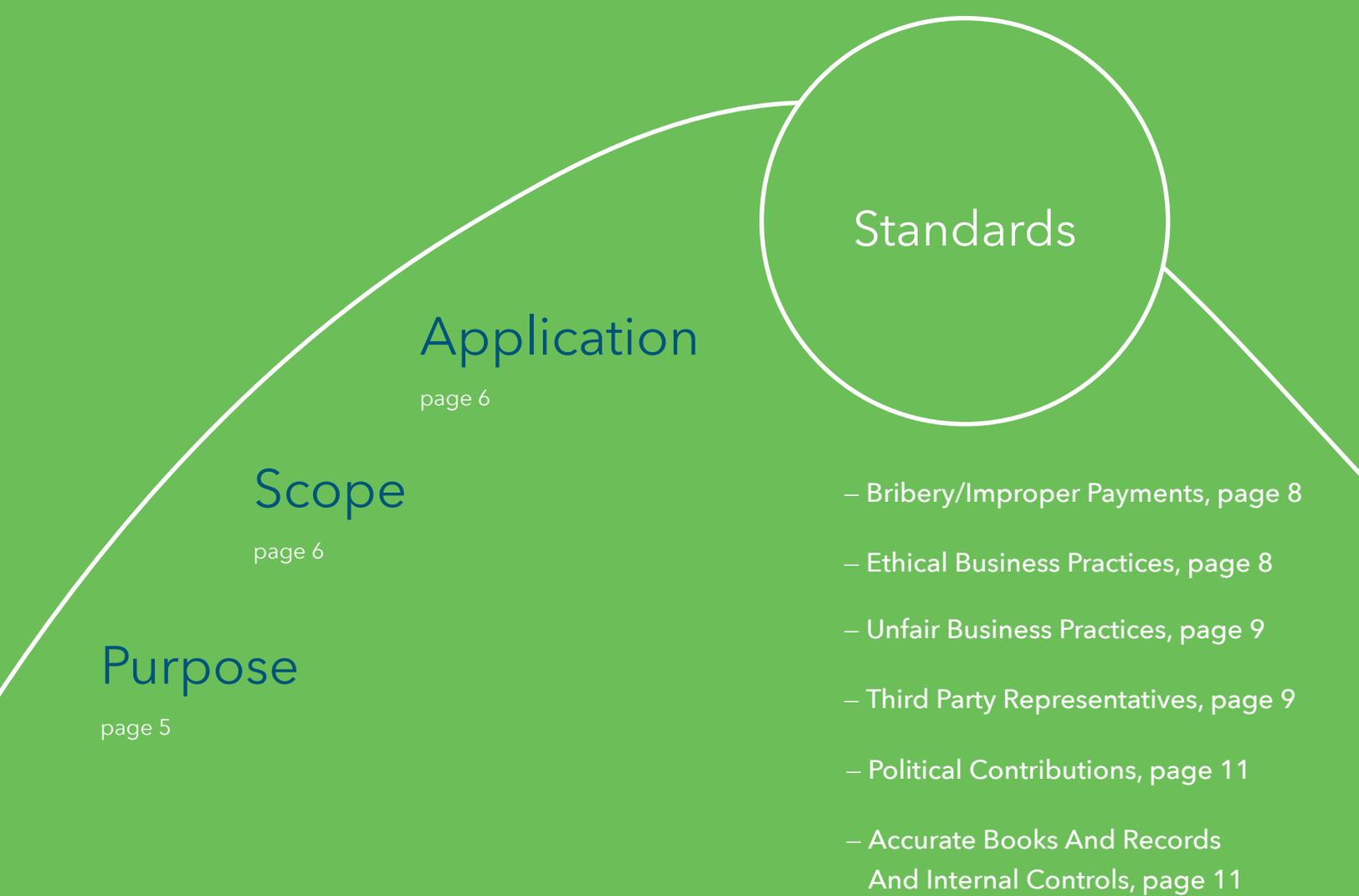


Prevention Of Corruption

teva | Global Compliance

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Purpose

This Policy on the Prevention of Corruption is intended to ensure that Teva conducts its activities ethically and in compliance with all Applicable Laws and Codes. These include, without limitation, international anti-corruption laws such as Article 291A of the Israeli Criminal Law, the US Foreign Corrupt Practices Act, and the UK Bribery Act, and the anti-corruption laws of every country in which we operate. This Policy establishes certain minimum standards concerning the prevention of corruption, and is a supplement to our Code of Conduct and Compliance Principles.

Terms used in this Policy are defined in the Appendix.

Purpose



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Scope



This Policy covers all activities and interactions with external individuals or organizations. These may include Healthcare Professionals, Government Officials, Customers, patients or other members of the Healthcare Community, Third Party Representatives, and other business partners.

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This Policy applies to all Teva organizations worldwide, and all directors, officers, and employees of Teva.

Directors, officers, and employees are personally responsible for compliance with this Policy. Teva personnel are also responsible for ensuring that any third party acting on behalf of Teva complies with this Policy.

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All Compliance policies and procedures must reflect the minimum standards set out in this Policy.

Training



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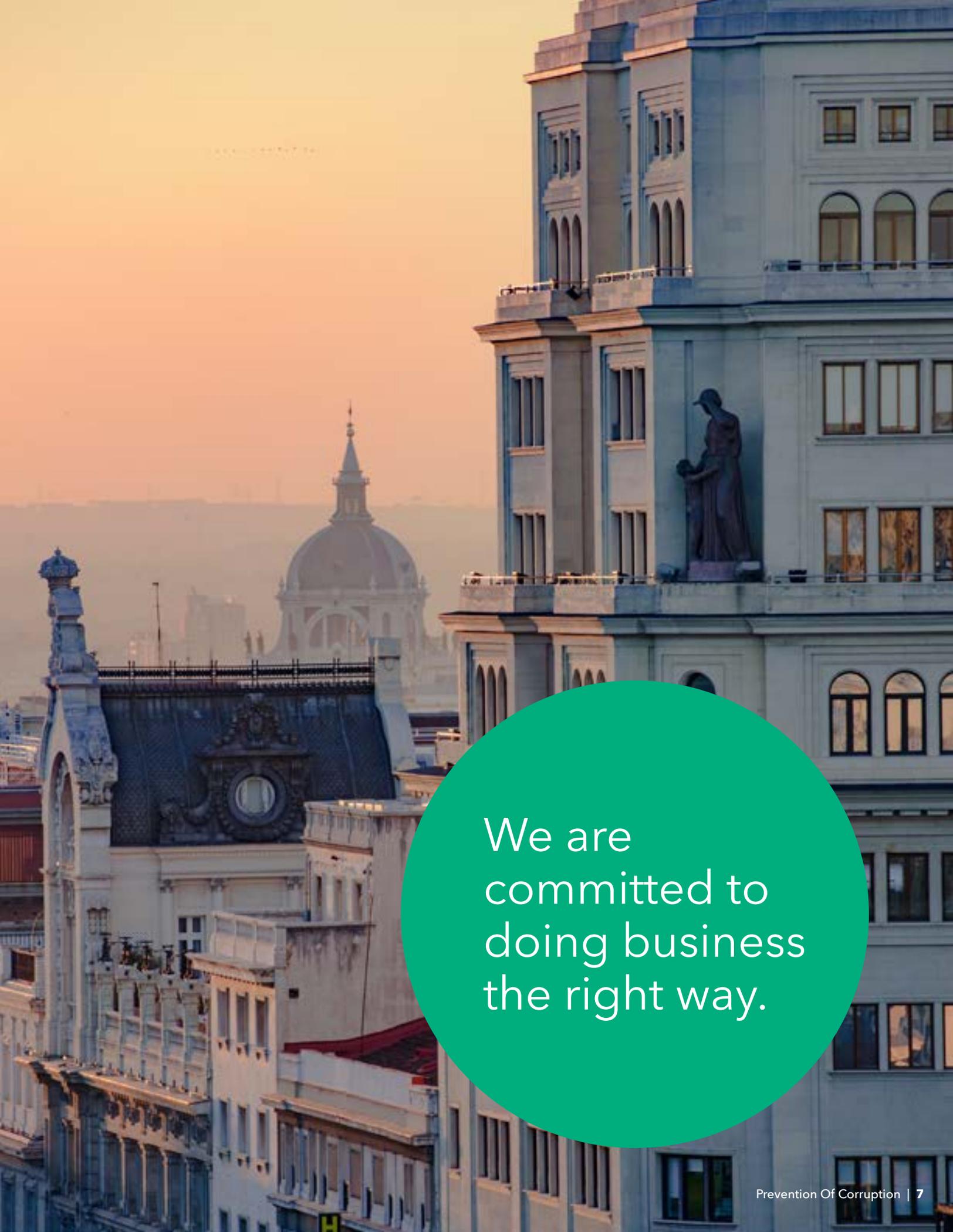


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A cityscape at sunset, featuring a large, ornate building with a dome in the background and a statue on a balcony in the foreground. A large green circle is overlaid on the image, containing the text: "We are committed to doing business the right way." The sky is a warm orange and yellow, and the buildings are silhouetted against the light.

We are
committed to
doing business
the right way.

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Standards

At Teva we comply with the following standards:

— Bribery/Improper Payments

Teva does not tolerate any form of bribery or corruption in the course of its business. We must never – directly or indirectly – give, offer, or promise Anything of Value for the purpose of improperly obtaining or retaining business, securing a business advantage, or influencing any other decision or action by the recipient. Teva does not tolerate corruption regardless of local customs or traditions.

Teva’s zero tolerance for corruption applies to our relations with everyone. Our prohibition on improper payments covers interactions with Healthcare Professionals and other members of the Healthcare Community, Government Officials, and Customers, including private sector business partners.

Teva also prohibits facilitation payments. This is the giving of a small payment of cash or Anything of Value to a Government Official to secure or speed up a routine government action, such as clearing our products through customs or expediting the processing of a visa. Facilitation payments violate most anti-corruption laws, and Teva strictly prohibits them even if a payment may be permissible or not expressly prohibited under local law.

— Ethical Business Practices

Teva is committed to doing business the right way. We comply with all Applicable Laws and Codes, and avoid situations that are contrary to Teva’s values or that may damage Teva’s reputation.

Our commitment to integrity means that we would rather lose an opportunity or sale than obtain benefits through unethical or improper means. In order to prevent improper payments or even the appearance of impropriety, we make sure that all of our activities and payments:

- Have a legitimate purpose and are not intended to gain an Improper Advantage;
- Are appropriate and reasonable;
- Are provided at Fair Market Value; and
- Comply with Applicable Laws and Codes.

Donations must not be provided for a promotional purpose or to gain an Improper Advantage. Donations may only be awarded to reputable not-for-profit institutions and organizations for genuine medical, scientific, educational or charitable purposes, and in an amount corresponding to the legitimate need. Donations may not be provided to individuals. All donations must be approved under the proper procedure.

— Unfair Business Practices

Teva complies with all applicable antitrust and competition laws. These laws are intended to promote the preservation of a competitive free market by prohibiting unreasonable restraints on competition and acts of monopolization.

Certain interactions with competitors (including potential competitors) could be deemed unlawful. In order to ensure reasonable and appropriate competitive business practices:

- We never communicate with actual or potential competitors about commercially sensitive information, unless we receive express approval from Legal. Such commercially sensitive information includes, but is not limited to market strategies, tenders, business opportunities, and any aspect of pricing or costs.
- If we are at a meeting (including a trade association meeting) and competitors start discussing commercially sensitive information, we must leave immediately, making sure that everyone present in the meeting would recall that we left upon refusing to exchange such information and preferably have this recorded in the minutes of the meeting, if any. Legal must be promptly notified of any such event.
- We never agree or cooperate in any way with competitors to fix any price related conditions and terms of trade; share or allocate markets in respect to specific territories, products, customers, or sources of supply; fix production, sale, or purchase volume; or boycott our customers or suppliers.

For additional behaviors that are prohibited under antitrust and competition laws, please refer to Teva Antitrust and Competition Compliance Guidelines.

— Third Party Representatives

Teva cannot take actions indirectly through a third party that we may not take directly. We may be held responsible for the actions of Third Party Representatives and expect them to abide by all Applicable Laws and Codes.

Third Party Representatives may only be engaged if they have been approved under the Global Compliance Due Diligence Policy and associated Procedure. Third Party Representatives must meet our standards for ethical business conduct, and must be engaged through written contracts with appropriate anti-corruption provisions.

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Standards *Continued*

— Political Contributions

Political contributions must never be given for the purpose of obtaining an Improper Advantage. All contributions to political parties or politicians must be for a legitimate purpose and must comply with Applicable Laws and Codes.

Political contributions may only be given following appropriate approvals. The Global Government Affairs and Public Policy Department must review and approve all proposed political contributions. The Regional Compliance Officer, in consultation with Legal, may require additional approvals for political contributions in a particular region or country.

— Accurate Books And Records And Internal Controls

We are accurate and transparent in our books and records. Teva must create and maintain books and records that reflect financial transactions and dispositions of assets fairly, accurately, and in reasonable detail. Teva employees must always adhere to applicable local finance and accounting policies and procedures. False or misleading entries in Teva's books and records, "slush funds," or other "off-the books" accounts are strictly prohibited.

We maintain effective internal controls. Teva must maintain a system of internal accounting controls sufficient to provide reasonable assurance that Teva's transactions are accurately recorded in its books and records in accordance with local finance and accounting policies and procedures, all Teva assets are accounted for, and access to Teva assets is controlled.

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Exceptions

Any exceptions to this Policy may only be granted, in writing, by Teva's Global Chief Compliance Officer. No exception will be granted that would violate an applicable law or regulation.

Breach

Any breach of this Policy, including failure to report actual or potential violations of this Policy or applicable law, may result in disciplinary measures, up to and including termination of employment.

Teva personnel are required to promptly report any known or suspected improper activity in violation of this Policy, Teva's Code of Conduct, or Applicable Laws and Codes. Such reports can be made to a manager, Compliance, Legal, or HR, or through Teva's Office of Business Integrity.

Teva will not tolerate any form of retaliation against anyone for making a good faith report of a potential violation.



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Audit, Monitoring, And Evaluation

Teva will monitor and conduct regular audits to test compliance with this Policy, other Compliance policies and procedures, and Applicable Laws and Codes. These monitoring activities and audits are intended to ensure that Teva's policies, procedures, and internal controls are effective in preventing and detecting any violation of this Policy, other Compliance policies and procedures, and Applicable Laws and Codes.

Training

Teva provides training on this Policy to appropriate personnel at the outset of their employment with Teva and requires regular certification thereafter. Global Compliance will work with other stakeholders to ensure appropriate training regarding this Policy and Applicable Laws and Codes.

References

- Teva Code of Conduct
- Teva Compliance Principles
- Global Compliance Policy on Due Diligence and Interactions with Third Party Representatives

Revision History

This Policy replaces and supersedes the Teva Global Anti-Corruption Policy.

Version	Date	Change	Explanation
1.0	November 9, 2016	N/A	New Policy
2	March 8, 2018	Updated Third Party Representative definition and references to Due Diligence Policy.	Changes necessary due to creation of Global Compliance Due Diligence Policy.

General Overview: This Policy establishes standards for Teva organizations worldwide on compliance with anti-corruption laws.			
Tevacorp-Policy: 02-001.002			
Domain:	Compliance	Effective Date:	April 15, 2018
Subject Matter Expert:	Senior Manager, Global Compliance Office of Policy Management	Version Date:	March 8, 2018
Owner: Senior Vice President, Global Chief Compliance Officer Signature:  _____ Name: Lori Queisser		CEO Signature:  _____ Name: Kåre Schultz	
Corporate Policies are subject to all applicable laws, rules and regulations in any applicable territory. In the event of any doubt or if questions should arise, the advice of the local legal department should be sought.			

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Appendix: Glossary Of Terms

The following terms are used in this Policy:

Anything Of Value: Anything that has monetary value or would constitute an advantage, financial or otherwise, to the recipient, such as, but not limited to: cash or a cash equivalent, services, offers of employment, fee-for-service contracts, charitable donations, political contributions, travel and/or entertainment expenses, meals, drug samples, gifts, conference and registration fees, and discounts not readily available to the public.

Applicable Laws And Codes: The international, regional, national, and local laws, regulations, competent authorities' decisions and guidelines, and industry codes governing the activity or interaction, which may include, without limitation, those of the country where the Teva entity responsible for the activity is located, where the activity or interaction takes place, and/or where the Healthcare Professional practices his/her profession.

Compliance: The Global and Regional Compliance functions reporting to the Global Chief Compliance Officer.

Customer: Any: (I) current or prospective business partner that purchases or intends to purchase any Teva product or service; (II) any party that negotiates the purchase price or purchase terms of Teva products or services on behalf of such purchaser; or (iii) any representative, owner, shareholder (10% or greater), officer, director or employee of such purchaser. Examples of Customers include, without limitation, retailers, wholesalers, and distributors.

Fair Market Value: The value that would be paid as a result of bona fide bargaining between well-informed parties in arm's-length transactions for the goods or services to be provided. The value shall consider the nature or quality of the goods or services to be provided, the qualifications of the provider, the geographic location where goods or services are to be provided, the nature of the market for the goods or services to be provided, and the prevailing rates for similar goods or services.

Government Official: Any (i) Official (elected, appointed, or career) or employee of a federal, national, state, provincial, local, or municipal government or any department, agency, or subdivision thereof; (ii) Officer or employee of a government-owned or -controlled enterprise or organization (e.g., a Healthcare Professional practicing at a government-owned or -controlled hospital or clinic); (iii) Officer or employee of a public international organization (e.g., UN, World Bank, EU, WTO, NATO); (iv) Individual acting for or representing a government or any of the organizations referred to above, even if he/she may not be an employee of such government or organization; (v) Individual

who is considered to be a government official under applicable local law; (vi) Candidate for political office; (vii) Official of a political party; and (viii) Family member of any of the Government Officials described in this definition.

Healthcare Community: Healthcare Professionals, Customers, Healthcare Organizations, Healthcare Professionals' associations, payers, non-HCP researchers related to Teva's research and development projects, universities involved in research or education related to medical or pharmaceutical science, government institutions providing services to Teva, patients, patients' associations, patients' advocacy groups, and journalists, collectively.

Healthcare Organization ("HCO"): An entity providing healthcare services including, without limitation, hospitals, clinics, pharmacies, and group medical practices.

Healthcare Professional ("HCP"): Members of the medical, dental, pharmacy, and 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, as well as any employees of any entity that is owned by or comprised of HCPs. Examples of Healthcare Professionals are physicians, nurses, medical assistants, pharmacists, paramedics, product formulary committee members, clinical investigators, and public and private hospital employees.

Improper Advantage: Exercising inappropriate influence to obtain or retain business, secure a commercial advantage, or gain something to which Teva is not legally or ethically entitled: for example, a regulatory approval for a product that fails to meet the statutory requirements. Improper Advantage also includes actual and perceived inducements of HCPs to prescribe, use, purchase, or order a Teva product, or to improperly influence the use or pricing of, or improperly arrange for the purchase, prescription, or use of, a Teva product.

Teva: Teva Pharmaceutical Industries Ltd. and its subsidiaries and affiliates in which Teva holds, directly or indirectly, 50% or more of any of the following: (i) outstanding equity interest; (ii) voting power, or (iii) rights to appoint directors and managers.

Third Party Representative ("TPR"):

- A Third Party to whom Teva provides or sells Goods, and who further provides or sells these Goods, directly or by an intermediary, to Government Officials, Governmental Entities or Healthcare Organizations; and/or
- A Third Party engaged and/or paid by Teva that may, with reasonable foreseeability, act on behalf of or represent Teva, directly or by an intermediary, in front of Government Officials, Governmental Entities, Healthcare Organizations or Healthcare Professionals.

