
Anti-corruption

At LINF, we believe that integrity and fair dealing should be reflected in all our activities, and we will work against corruption in any form. We do not accept corrupt activities, whether committed by our Board members, employees or trustees acting on our behalf.

LINF will ensure that

- Systems and controls are in place to prevent fraud against LINF.
- Our Board members, employees, trustees and third parties* are familiar with and follow procedures to avoid bribery*.
- All incidents of fraud* are thoroughly investigated and appropriate disciplinary actions are taken.
- Business decisions taken by our Boards members or employees are not influenced by gifts or entertainment from business partners.

You are expected to

- Ensure that you do not engage directly or indirectly in fraud* against LINF, any of our partners, or government entities.
- Ensure that you do not engage directly or indirectly in bribery*.
- Refuse to pay any bribes, including small amount bribes or facilitation payments*.
- If a bribe is demanded, refer to LINF's Code of Conduct and immediately report to your manager.
- Only accept gifts or other advantages of a token value from stakeholders*.

Trustees or third parties are professionals and entities performing activities within LINF's core business areas either on behalf of or in the material interest of LINF.

Fraud generally means acting dishonestly or deceptively with the intention of obtaining an undue benefit, in order to avoid an obligation, to cause a loss to another party or to illegally remove funds.

Bribery means to offer, promise or give any undue advantage, directly or indirectly, to a public official or a business partner, to obtain or retain business or other improper business advantage. Bribery is illegal whether you offer or give an undue advantage, or whether you receive such an advantage or a promise yourself.

Facilitation payments are illegal, non-official, small value payments, gifts or fees paid to public officials to speed up the delivery of a routine task or services that are part of their duties e.g. a customs officer stamping a customs form. The payment is for a task or service that the giver is entitled to receive.

Stakeholders are any member of society that you interact with as part of your work such as healthcare professionals, patients and patient organizations, regulators, payers, scientific and business partners.

Interactions with healthcare professionals

At LINF, we believe that interactions with healthcare professionals* have a profound and positive influence on the quality of patient treatment and the value of future scientific education. We acknowledge that in certain situations it is legal and expected that we sponsor events* and pay related hospitality in accordance with the following codes of practice.

LINF will ensure that

- Events* are compliant with the laws, regulations and industry standards
- Events* and related hospitality are always provided with the intention of enhancing knowledge about our products or provide scientific or educational information.
- All expenses for events* and related hospitality or gifts are kept at a reasonable level.
- Events* and related hospitality or gifts are not used to inappropriately influence the healthcare professional.
- Systems and procedures are in place to ensure all transfers of value to healthcare professionals are recorded, reported or disclosed according to procedures approved by the Board.

You are expected to

- Be able to document the legitimate need for and the professional purpose of all transfers of value to healthcare professionals.
- Ensure a written agreement is agreed in advance of the commencement of genuine consultancies or other relevant services, which specifies the nature of the services to be provided and the basis for payment of those services.
- Ensure that the compensation offered to healthcare professionals* speaking or presenting at an event* reflect the fair market value.
- Ensure that the decision to invite healthcare professionals* to international events* is based on professional or logistical arguments.
- If you sponsor a healthcare professional's* participation in an event*, only pay travel, meals, accommodation and registration fees.
- Abstain from paying for expenses unrelated to events* or for any costs for spouses, family or other companions.
- Avoid organizing or sponsoring entertainment, leisure or social activities as part of events unless in agreement with approved LINF procedures.
- Only offer gifts of token value

A *healthcare professional* is any member of the medical, pharmacy or nursing professions or any other person, who in the course of his or her professional activities may recommend, prescribe, purchase, supply or administer a medicinal product.

Events are symposia, congresses and other scientific or professional meetings for healthcare professionals which aims at providing scientific or educational information..
