

# Global Anti-Corruption Policy

As a US listed Company with global operations, QIAGEN is subject to anti-corruption laws worldwide, such as the Foreign Corrupt Practices Act (FCPA) which essentially prohibits each QIAGEN member worldwide to give any incentives of value to foreign officials to obtain or direct business. While this policy is particularly address to *Global Commercial Operations* and *QIAGEN Management*, QIAGEN expects all employees to refrain from engaging in any form of bribery or corruption. Violation of anti-corruption laws such as the FCPA can have significant consequences for QIAGEN and its employees who can be held personally liable. This policy gives you guidance to understand the requirements, risks and pitfalls of anti-corruption laws in order to avoid any conflicts.

## APPLICABLE LAWS

This policy will cover applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act 2010 (UKBA) and is intended to make you aware of their prohibitions so that you can recognize potential problems as they arise.

## STATEMENT OF POLICY

Unless expressly permitted in this policy and approved in advance in writing in accordance with the procedures set forth in this policy, no director, officer or employee of QIAGEN or any of its directly or indirectly controlled subsidiaries (collectively, "Representatives") or QIAGEN's business partner shall make, provide, offer, solicit or accept any payment, gift or thing of value, whether directly or indirectly, to or from any Government Official (defined below) or to any private person or any organization

with the intention to obtain or retain business in return. QIAGEN Representatives may only give or accept business courtesies in strict compliance with the local Marketing Policy and any other applicable QIAGEN policies. Representatives should never give or accept a business courtesy that will compromise their judgment, inappropriately influence others, or reflect negatively on QIAGEN.

This policy also prohibits corrupt payments made by third party representatives of QIAGEN or any of its directly or indirectly controlled subsidiaries. Payments, gifts and things of value may not be provided, offered, authorized or reimbursed, directly or indirectly through any third party acting as an agent or representative of, or independent contractor working for, or otherwise on behalf of QIAGEN or any of its direct or indirect controlled subsidiaries.

Under this Policy, the term "Government Official" means:

- Anyone who works for any government or for any government agency or department;
- Any person acting in an official capacity on behalf of a government or any department or agency;
- Any person who works for any company that is owned or controlled by any government or government department or agency (remember that in many countries many of our customers fit this description, e.g., hospitals, research institutes, or government owned companies);
- Any officer or employee of a public international organization such as the World Bank or the United Nations;
- Any political party or any official thereof; or
- Any candidate for political office.

Under this policy, the term “payments, gifts and things of value” includes the following (note that these are just examples; this is not intended to be a complete list):

Cash payments (never allowed), goods, services, favors, benefits, tickets to entertainment, membership in social organizations, seasonal gifts, conference fees, honoraria, loans, charitable contributions, special discounts, hotel rooms, transportation, job offers, political contributions, gifts (no matter how small), interests in business, and any and all other things that have value to the recipient or that have value to people the recipient cares about (like family, friends and business associates).

### LIMITED EXCEPTIONS

The following activities are permitted under this policy:

1. Provision of moderate non-cash gifts and hospitality to customers that are given in good faith and without improper intent in connection with QIAGEN’s legitimate marketing and sales activities, (cash gifts are never permitted).
2. Provision of travel and lodging directly related to the promotion, demonstration, or explanation of QIAGEN’s products or services.

### ACCURATE BOOKS AND RECORDS & INTERNAL CONTROLS

The FCPA and other laws specifically require companies to keep accurate books and records, as well as establish and maintain internal controls to account for all assets and thereby eliminate the possibility of “slush funds” from which illegal payments may be made. This requires the creation and maintenance of internal accounting controls sufficient to provide reasonable assurances that:

1. All transactions are executed in accordance with management’s general or specific authorization.
2. Transactions are recorded as necessary to permit preparation of financial statements in conformity with GAAP.

In other words, under these regulations even a petty cash fund could be considered an “off-the-books slush fund” if it were not properly accounted for in the Company’s books and records.

False, misleading, incomplete, inaccurate or artificial entries in the books and records of any QIAGEN company are strictly prohibited. It is never allowed to mischaracterize an improper payment as a proper one, or to bury an improper payment in a larger line item of proper payments. In addition, each QIAGEN reporting entity is required to maintain an internal control environment designed to prevent improper payments.

### THIRD PARTY INTERMEDIARIES

Before any QIAGEN company hires or enters into a contract or business relationship with any agent, reseller, distributor, consultant, or other representative to perform work that (i) will or may involve transacting business with a government official, or (ii) that will or may involve making sales of QIAGEN company products to others, QIAGEN requires that due diligence be conducted and proper authorization be obtained prior to commencing the relationship with the representative. The purpose of the due diligence is to establish whether the representative is a legitimate business that will not make corrupt payments; to establish whether it is a government-related entity or person; and whether it has any reputation for (or history of) making corrupt payments. QIAGEN will further exercise a due diligence program on distributors and agents with the support of external providers on an ongoing basis. This due diligence program includes the contractual obligation by all third party intermediaries to observe the related QIAGEN policies, trainings and background checks which will be applied with a risk based approach.

### MERGERS; ACQUISITIONS, AND JOINT VENTURES

Any agreement by a QIAGEN company to merge, acquire, or enter into a joint venture with a non-QIAGEN entity requires advance approval from the QIAGEN Legal Department. In situations where QIAGEN or a subsidiary will merge with, acquire a majority stake or operational control in, or acquire all or substantially all of the assets of a non-QIAGEN entity, QIAGEN must perform specific due diligence to properly guard against legal, financial, and reputational risks related to potential corruption issues arising from those transactions.

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## COMPLIANCE AND PENALTIES

Management and the financial and legal staff of QIAGEN are responsible for compliance with and implementation of this policy. Failure to comply with this policy will be grounds for disciplinary action up to and including termination. In addition, individuals violating anti-bribery laws may be fined and imprisoned as the result of criminal prosecution.

## TRAINING

The QIAGEN Compliance Committee will provide training and education as needed.

## REPORTING AND NON-RETALIATION

Employees who are aware of a possible violation should report the Head of Legal and Compliance (Tel.: +49 2103 29 14000 or [compliance@qiagen.com](mailto:compliance@qiagen.com)).

If you are unsure about whether you are being asked to make an improper payment, do not make the payment. Please consult with your supervisor, higher management, or the QIAGEN Legal Department (or if greater confidentiality is desired, by making a report to the compliance hotline as noted above), and obtain advice before making or helping any other person to make any payment.

Any questions concerning this policy or the approval processes required by this policy may be addressed to the QIAGEN Legal Department (contacts as stated on QIANet under legal resources).