



124 Bernard E. Saint Jean Drive
East Falmouth, MA 02536-4445

888.395.2221 / 508.540.3444
custservice@acciusa.com

Corruption and Bribery Prevention Policy

Associates of Cape Cod, Inc. (ACC) recognizes that high ethical and professional standards are required of a company that is a global supplier of goods and services vital to healthcare. In accordance with this policy, ACC will engage in appropriate commercial operations by building and maintaining fair, transparent, and sound relationships with our commercial partners

1. Scope of application

- Applies to all officers, and employees of ACC and its subsidiaries

2. Legal compliance

- Comply with applicable anti-bribery laws, regulations, and industry standards applicable in all countries and regions where ACC engages in business activities

3. Prohibition of corruption

- Do not engage in corruption. Personnel are expected to avoid any conflicts of interest, illegal actions, whether for individual or organizational gain, including fraud, money laundering, or insider trading

4. Prohibition of bribery

- Do not offer, demand, or accept bribes from anyone including government officials, public servants, medical practitioners, and company representatives. Either directly or indirectly, for the purpose of securing or maintaining a business benefit

5. System for the prevention of corruption and bribery

- To prevent corruption and bribery, provide education and training to directors, officers, and employees of ACC in accordance with this policy and, through our internal reporting system, appropriately respond with questions or allegations of corruption and/or bribery

6. Violations

- If any violation of this policy occurs, as applicable, impose discipline on the officers, or employees in accordance with the rules of employment

A handwritten signature in black ink, appearing to read 'A. J. Meuse'.

President & CEO