



Anti-Corruption Policy – Appendix A

Guidelines on Payments for the Benefit of Government Officials

In many countries, gifts play an important role in business protocol and customs. In addition to the Stericycle Business Courtesies Policy, the following guidelines may assist you in determining what, when and to whom it is appropriate to provide or accept Business Courtesies.

Help in Identifying High Risks:

As the Policy states, it is important to identify Government Officials and High Risk Vendors as certain laws, regulations and policies pertaining to Business Courtesies apply to them.

Government Official(s) include anyone who is a(n):

- Officer (elected, appointed, or career) or employee of any department, agency, or instrumentality of a government (federal, state, provincial or local), whether administrative, legislative or judicial, no matter the rank or function;
- Person acting in an official capacity for or on behalf of a government or any department, agency, or instrumentality of a government (either at federal, state, provincial or local level);
- Officer or employee of a government-owned or government-controlled (in whole or in part) enterprise, organization, company, or instrumentality;
- Any employee or officer of an entity hired to prepare a request for proposal or an invitation for bids, or to review and/or accept bids for any federal, state, provincial or local government or any department, agency, or instrumentality of a government;
- Official or employee of a public international organization (e.g., UN, World Bank, EU, WTO, NATO, Red Cross, FIFA, International Olympic Committee);
- Individual acting for or on behalf of a government or international organization, even though he/she may not be an employee of such government or organization;
- Any political party or official and/or employee of a political party and/or candidate for political office; and
- Individual who is considered a government official under applicable local law.

High Risk Vendors (HVR) are *Third Party Representatives* that interact with government agencies, officials and/or employees on behalf of Stericycle. They may include:

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| • sales agents and representatives | • customs clearing agents |
| • transportation or logistics providers | • brokers and joint venture partners |
| • any non-Company third parties operating under a power of attorney granted by the Company | • temporary or contract staff |
| | • consultants |
| | • lobbyists |



Because an HRV presents a higher risk to the company, due diligence review will be required prior to utilization.

Gifts

In many countries, gifts play an important role in business protocol and customs. In addition to the Stericycle Anti-Corruption Policy, the following guidelines must be followed when giving gifts to Government Officials:

- Gifts of cash or cash equivalents are never permitted.
- No more than one gift should be given by a Stericycle employee to a Government Official in connection with a customary holiday, such as the Chinese New Year. (A gift can include more than one item, for example, a gift basket, provided the total value is within allowed limits.)
- Company employees should avoid giving multiple gifts to an individual Government Official over the course of a year (for example, small gifts given in connections with multiple holidays). The cumulative value of all the gifts given to an individual Government Official in any year should not exceed US\$150.
- Gifts should not be given to a Family Member of a Government Official.
- Prior to offering a gift to a Government Official, employees must get approval from the Country Manager and the Office of Ethics and Compliance and confirm that the gift is permitted under local law.
- Under NO circumstances shall a gift be approved when given to corruptly secure a business advantage, or improperly influence governmental decisions, on behalf of Stericycle.

Entertainment

Like gifts, in many countries business entertainment is customary and plays a proper role in developing business relationships and the conduct of business generally. In addition to the Stericycle Anti-Corruption Policy, the following guidelines must be followed:

- Employees may host a working lunch with Government Officials in connection with a business meeting provided the expenses are reasonable, there is no intent to obtain special treatment in return, and the officials are permitted to accept the entertainment under local rules.
- Company employees should avoid providing multiple meals or entertainment for the same Government Official. Although it may be reasonable to provide a few modest meals to an individual or group of officials incidental to business discussions, frequent meals or entertainment provided to one or a group of officials can be a warning sign of improper activity.



- Pre-approval must be obtained from the Office of Ethics and Compliance and the Country Manager prior to offering meals or entertainment to a Government Official and confirmation received that the benefit is permitted under local law.
- Under NO circumstances shall business entertainment be approved when given to corruptly secure a business advantage, or improperly influence governmental decisions, on behalf of Stericycle.

Training, Travel and Per Diems

In very limited circumstances, it may be appropriate to provide training or travel to a Government Official. In addition to the Stericycle Anti-Corruption Policy, the following guidelines must be followed:

- The purpose and details of the trip must be documented, including the participants and itinerary.
- The expenses must be permitted under local Law.
- Generally, the training portion of any program must represent a substantial amount of each day of the program.
- The Company should not select the Government Officials who will attend; rather, the Government Officials' employer should select the attendees.
- Travel should be economy class; meals and accommodations must be modest and comply with Global Travel & Entertainment and Corporate Card Policy.
- Extreme caution should be exercised for trips to locations that are also tourist destinations.
- Expenditures should not be made that benefit a Family Member or guest of an attending Government Official.
- The Company should pay all travel and training service providers directly, not the Government Officials themselves.
- Cash or per diems should not be given to attendees.
- Prior to offering or agreeing to pay for training, travel and associated costs for Government Officials, it must be approved by the Country Manager and the Office of Ethics and Compliance.
- Under NO circumstances shall business entertainment be approved when given to corruptly secure a business advantage, or improperly influence governmental decisions, on behalf of Stericycle.

All expenditures related to gifts, business entertainment and travel must be accurately recorded in the Company's books and records.

REVISIONS/REVISION HISTORY

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