



aclegal

A specialized forum for
in-house counsel and
compliance personnel
working on anticorruption
compliance issues in the
Life Sciences sector

what is alegal?

aclegal is a membership-based forum for in-house counsel and compliance personnel working on anticorruption compliance issues in the Life Sciences sector.

what sets alegal apart?

- alegal is a truly industry-led group; the members determine and customize the agenda for each meeting.
- alegal members elect a chairman from amongst the membership who directs the substance of alegal meetings and communications, with input from the membership.

objectives

- Share and benchmark best practices in the area of anticorruption compliance.
- Facilitate the exchange of knowledge and ideas relating to current challenges, and develop relationships among member companies' in-house counsel and compliance personnel.
- Facilitate direct interactions with industry leaders, self-regulatory bodies, and key government regulators/enforcement agencies.
- Keep members updated regarding the latest legal and regulatory developments and enforcement trends in the areas of anticorruption compliance around the world.

membership benefits

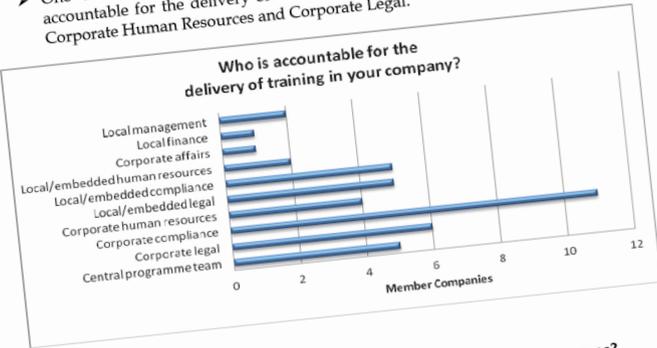
- Biannual in-person meetings
- Semi-annual conference calls to discuss recent relevant developments on anticorruption laws and enforcement developments and trends
- Benchmarking reports, prepared based on questionnaires tailored to the interests of the members
- Updates and alerts on relevant legal and regulatory developments
- Access to a members-only, password-protected website with anticorruption background resources and alegal work product
- Unique networking opportunities
- Antitrust supervision
- Resources of Sidley Austin LLP's outside counsel on non-company specific questions and the proposal of possible legal solutions to generic problems and issues encountered collectively by member companies

Examples of graphs and text from benchmarking reports



ACLEGAL BENCHMARKING SUMMARY – JULY 2012

- In one of these five companies, Corporate Human Resources, Local Legal and Local Human Resources are also accountable.
 - One of these eleven companies stated that accountability for the delivery of training is shared with Local Compliance.
- Corporate Legal is the function accountable for the delivery of training in six member companies.
- In four member companies, the Central Programme Team is the function accountable for the delivery of training.
- One member company answered that Corporate Affairs is the function accountable for the delivery of training, although accountability is shared with Corporate Human Resources and Corporate Legal.



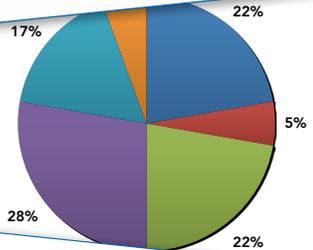
5. Which of the following elements are included in your training programme?

The member companies were requested to indicate all answers applicable to their company. They responded as follows:

- Examples of red flags: Sixteen member companies.
- Process for escalating and reporting incidents: Sixteen member companies.
- Interactions with government officials: Sixteen member companies.
- Interactions with third parties/business partners: Sixteen member companies.

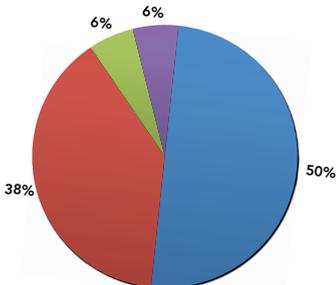
20

- We offer in-person training to third parties
- We do not train third parties
- We do not have a formal/defined approach to providing training to third parties



Due Diligence of Third Parties

Does your company require third parties to consent to the company's right to audit the third party's books and records in your contractual clauses?



- Yes, for all third parties
- Yes, but only for high-risk third parties
- No, there is no contractual right to audit but a "reasonable effort" clause
- Depends on the type of agreement

aclegal contacts



David J. Ludlow
+1 202 736 8266
dludlow@sidley.com



Maurits J.F. Lugard
+32 2 504 6417
mlugard@sidley.com



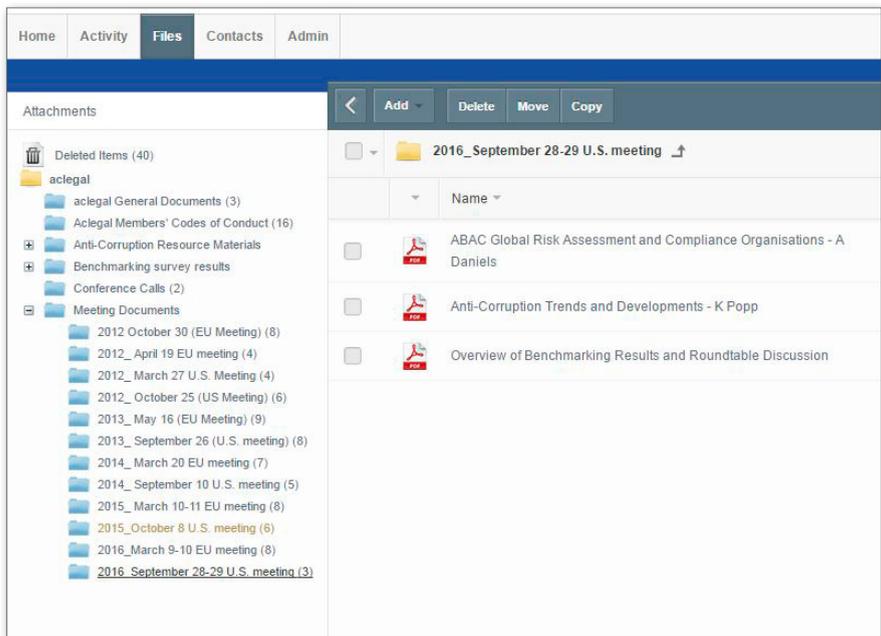
Karen A. Popp
+1 202 736 8053
kpopp@sidley.com



Michele Tagliaferri
+32 2 504 6486
mtagliaferri@sidley.com

For more information, contact aclegal@sidley.com

aclegal Extranet: Members-only access to reports, meeting materials, anticorruption resources and member contact directory



Other Life Sciences Legal Forums

