

### **Foreign Corrupt Practices Act Questionnaire**

As part of VWR's process for complying with the U.S. Foreign Corrupt Practices Act ("FCPA"), VWR requires our dealers to complete this questionnaire. Answers to this questionnaire should cover the five-year period preceding the date of completing this questionnaire. As used herein, the "Company" shall mean the entity that is proposing to purchase products from VWR and on behalf of which this questionnaire is signed below as well as such entity's subsidiaries and any joint ventures or partnerships in which such entity participates or is involved..

#### **Note About Terminology Used In This Questionnaire:**

1. **"Government," "government entities," etc.** Throughout this questionnaire, references to "government," "government entities," "government officials," "government regulations," "political parties," or "political candidates" are to *non-U.S.* government entities, officials, regulations, political parties, or candidates.

For purposes of this questionnaire, the term "government official" means:

- any employee or official of a foreign (i.e., non-U.S.) government; or
- any employee of a public international organization; or
- any person acting on behalf of an employee of a foreign government; or
- any person acting on behalf of a public international organization; or
- any foreign political party or its officials; or
- any candidate for a foreign government office.

Also, a "foreign government" includes national, local, and municipal governments, and any department or agency thereof, as well as any businesses or services that are partially- or wholly-owned or operated by one of these types of government entities.

2. **"Third party".** Throughout this questionnaire, the term "third party" includes any vendor, customer, representative, agent, attorney, accountant, banker, advertising agency, trade association, consultant, or others with whom the Company has transacted, or may transact business, or whom the Company has used, or may use, in the conduct of any of its business affairs.

3. **"Value".** Throughout this questionnaire, references to "something of value" or similar phrases refer to items that can include cash, cash equivalents (gift certificates), merchandise, services, loan of company assets, personal loans, offers of employment, below-market rent, trips, unusual discounts, or other benefits.

**I. Government Affiliations**

Are any owners, shareholders, directors, officers, managers or other employees of the Company (or any of their respective relatives) currently, or during the last five years have any of such individuals been, an officer or employee (or otherwise acted in an official capacity) of (i) a government or any department, agency, or instrumentality thereof, (ii) a company that is government-owned or controlled, or (iii) a public international organization?

☐ No

If yes, please provide further information \_\_\_\_\_

**II. Government Contacts**

**A. Sales to Government**

1. Does the Company sell or market any goods or services to government entities?

☐ No

2. (a) Does the Company sell or market any goods or services to government entities through third parties, such as distributors or sales agents ("Subdistributors")

☐ No

(b) Does the Company sell or market any goods or services to resellers (other than Subdistributors) that it is aware then sell or market such goods or services to government entities ("Resellers")

☐ No

If the answer to 2(a) or 2(b) is yes, please answer the following questions:

- i. How are such Subdistributors compensated by the Company for their services and/or what are the pricing or consideration terms of the arrangements with such Resellers (e.g., flat monthly fee, percentage of sales made, discounts etc.)?
- ii. For Subdistributors or Resellers that are individuals, are any of them a current or former government official, or do any of them have family or business ties to a government official?

☐ No

If yes, please explain the nature of the relationship \_\_\_\_\_

- iii. For any Subdistributors or Resellers that are entities, are any of the owners, shareholders, directors, officers, managers, or employees of those Subdistributors or Resellers current or former government officials, or individuals with family or business ties to government officials?

☐ No

If yes, please explain the nature of the relationship \_\_\_\_\_

- (c) Has any information, report, allegation, or other indication been received by the Company that a Subdistributor or Reseller or any other third party offered (or was asked to provide) a government official anything of value on behalf of the Company or otherwise to help sell the Company's goods or services?

☐ No

If yes, please provide further information \_\_\_\_\_

#### B. Giving Things of Value

Other than as described above, has the Company received any information, report, allegation, or other indication that an owner, director, officer, employee; or agent of the Company or any third party on behalf of the Company has either offered anything of value to a government official or been requested by a government official to give something of value?

☐ No

If yes, please provide further information \_\_\_\_\_

### III. Contributions

- A. Has the Company given, or been asked to give, anything of value, directly or indirectly (i.e., through a third party), to a political party or candidate for any political office?

☐ No If yes, please provide further information \_\_\_\_\_

- B. Has the Company given, or been asked to give, anything of value, directly or indirectly (i.e., through a third party), to a charity?

☐ No If yes, please provide further information \_\_\_\_\_

- C. Has the Company provided or been asked to provide an education or research grant to a government official, to an individual with a family or business to a government official? Note a grant can include more than money e.g. computer equipment, books or other educational material, machinery or other items intended to aid in research, etc.

☐ No If yes, please provide further information \_\_\_\_\_

**IV. Travel and Entertainment**

- A. Has the Company paid for any travel by a government official, or for an individual who has family or business ties to a government official?

☐ No If yes, please provide further information\_\_\_\_\_

- B. Has the Company paid for the entertainment of a government official, or for an individual who has family or business ties to a government official? Entertainment can include meals, tickets to sporting or cultural events, etc.

☐ No If yes, please provide further information\_\_\_\_\_

**Certification by Company Owner and/or Company Officer**

The undersigned certifies that the information provided in this FCPA Due Diligence Questionnaire is true and accurate to the best of his or her knowledge.

.....  
Company Name

Name :

Title:

Date: