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| HIV Cure – Letter of Intent | | |
|  | | |
| Please answer all sections below and submit the completed form to [grants@gilead.com](mailto:grants@gilead.com) with the email subject heading “HIV Cure LOI – [Organization Name, Principal Investigator Name]”. The completed Letter of Intent must be received by Gilead by **May 1, 2016**. Letters received after this date will not be accepted for consideration. If you have any questions about the application form, please email [grants@gilead.com.](mailto:grants@gilead.com.) | | |
| **Section A** | | **Applying Organization/Institution Information** |
| Organization/Institution Name | |  |
| Tax ID Number | |  |
| Principal Investigator | |  |
| Degree/Title(s) | |  |
| Department | |  |
| Address | |  |
| City, State, Zip / Province , Postal Code | |  |
| Country | |  |
| Website Address (if available) | |  |
| Telephone | |  |
| Email | |  |
| Is your organization an existing Gilead grantee? | | Yes No |
| Has your organization applied for or received funding from Gilead in the past? | | Yes No |
| **Section B** | | **Executive Summary** |
| Program Title  (Do not exceed 25 words) | |  |
| Program Amount Requested From Gilead  (use an estimate and USD currency) | |  |
| List of other Supporters to the Program  (Include name and amount in USD currency) | |  |
| Request Type | | Translational Research Efficacy Studies in Animal Models  Institutional Funding Community Groups |
| Abstract  (Do not exceed 200 words) | |  |
| **Section C** | | **Letter of Intent Details** |
| 1. **Organization/Institution Description (Do not exceed 50 words)** | | |
|  | | |
| 1. **Biographical Sketches**    * *Use the NIH biosketch format in Appendix A to provide abbreviated biosketch for the principal investigator and up to two additional key co-investigators or collaborators, if applicable.*    * *Instructions for completion are in Appendix B*    * *Online access to these documents can be found at the following hyperlink:*   [*http://grants.nih.gov/grants/funding/424/index.htm*](http://grants.nih.gov/grants/funding/424/index.htm) | | |
| 1. **Research Plan (Entire plan overview should not exceed two page.)**  * *Provide an abbreviated proposal overview including background and rationale, preliminary studies, specific aims, design, and procedures.* * *If patient community organization, please list objective/s, program activities, and expected outcomes.* | | |
|  | | |
| **Section D** | **Mandatory Disclosures** | |
| 1. Has the organization or its officers, directors, employees or agents been investigated or convicted of criminal or civil violations, including but not limited to bribery, fraud, tax evasion, export or antitrust violations?   Yes  No | | |
| 1. Does the organization or any of its directors or executive management members have any relationships (family or business) with any government, government entities or government officials? *If yes, please provide details.*   Yes  No | | |
| 1. Does the organization currently employ or have any plans to employ a government official or the relative of such a person as an employee, consultant, contractor or in any other capacity? *If yes, please provide details.*   Yes  No | | |
| 1. Is the organization or any of its directors or executive management members in a position to purchase, influence, affect or recommend the purchase of Gilead products? *If yes, please provide details.*   Yes  No | | |
| **Privacy Consent** | | |  |
| |  |  |  |  | | --- | --- | --- | --- | |  | *By entering your details on this questionnaire you hereby consent to the processing of any personal information you have included in the questionnaire, and you confirm that you have the relevant rights and/or permissions to provide such personal information to Gilead. Gilead, and its affiliate companies, shall process such personal information for the purpose of conducting due diligence checks. You also consent to being contacted by Gilead for the purposes of reviewing the questionnaire and informing you of the outcome of these due diligence checks.   Information provided by you may be transferred to other third parties for processing, such as the authorized consultants of Gilead, service providers of Gilead (or other carefully selected third-party organizations authorized by Gilead, together, referred to as “Third Parties”) exclusively for the purpose of carrying out due diligence checks. Gilead will require these Third Parties to whom it discloses information you have provided to protect such information using substantially similar standards to those required by Gilead, including an obligation on those Third Parties to use appropriate technical, administrative and physical safeguards to protect information you have provided from loss, misuse or alteration. Gilead also requires that such Third Parties do not use information you have provided for any purpose that is not specifically authorized by Gilead.  The data that we collect from you may be transferred to and stored or processed in the United States, a destination that may be outside of your country and outside of the European Economic Area. By submitting personal data, you agree to this transfer, storing or processing and confirm that you have the relevant rights and/or permissions to consent to such on behalf of anyone else whose personal data you have included in this questionnaire.*  *Gilead Sciences shall process your personal information in accordance with the Gilead Privacy Statement, available at [http://www.gilead.com/privacy/privacy-statement](http://www.gilead.com/privacy/privacy-statement" \t "_blank).*  **Please check an option below**   |  |  | | --- | --- | |  |  |   **I consent to the transferring, storing or processing of any personal information I have included in the questionnaire, and I confirm that I have the relevant rights and/or permissions to provide such personal information to Gilead.**  **I do not consent to the processing, transfer or storage of the personal information in this questionnaire, or I have questions regarding this privacy consent.** | |  |  | | | |  |
| **Anti-Corruption Policy** | | |  |
| |  |  |  |  | | --- | --- | --- | --- | |  | Attached as “Appendix C” is Gilead’s Anti-Corruption Policy. Please review the Policy.  Once you have thoroughly reviewed Gilead’s Anti-Corruption Policy, please certify whether you will comply with said policy. If you have any questions or do not understand any aspect of the policy, do not certify your compliance and instead reach out to Gilead with any questions.  **Please check an option below**   |  |  | | --- | --- | | **We will comply with Gilead’s Anti-Corruption Policy.**  **We do not understand the policy, have questions or will not comply.** |  | | | | |  |
| **Acknowledgment of Terms** | | |  |
| **Please read each term below and check the corresponding box if you agree to the term**  If grant-awarded by Gilead, we will ensure that all activity in connection with the project/funding is compliant with laws/regulations and any applicable Code of Practice.  If grant-awarded by Gilead, the institution agrees to limit its institutional costs (indirect costs) to a maximum of 15% of total direct costs.  For the avoidance of doubt, we understand that the receipt of a grant shall impose no obligation upon the Grantee to promote or otherwise encourage the prescription, recommendation, purchase, supply, sale or administration of the products of Gilead or its affiliates.  We understand that any provisional offer of grant funding by Gilead is subject to a contractual agreement setting out the terms of such funding; the contractual agreement must be signed and returned to Gilead prior to the commencement of any grant-funded activities; we must abide by the stipulations of the grant or donation set forth in the contractual agreement.  If grant-awarded by Gilead, we agree to disclose the source of funding on all project specific materials and, if applicable, the organization website.  We understand that Gilead may disclose the provision of this grant or donation via its website, and that the disclosure may include the following information: the name of the organization, a brief description of the activity and/or the amount of money provided. | | |  |
| **By entering my name below, I hereby certify that the above statements are true and correct to the best of my knowledge.** | | |  |
| Name & Title Date | | |  |

**APPENDIX A**

OMB No. 0925-0001 and 0925-0002 (Rev. 10/15 Approved Through 10/31/2018)

BIOGRAPHICAL SKETCH

Provide the following information for the Senior/key personnel and other significant contributors.  
Follow this format for each person. **DO NOT EXCEED FIVE PAGES.**

NAME:

eRA COMMONS USER NAME (credential, e.g., agency login):

POSITION TITLE:

EDUCATION/TRAINING (Begin with baccalaureate or other initial professional education, such as nursing, include postdoctoral training and residency training if applicable. Add/delete rows as necessary.)

| INSTITUTION AND LOCATION | DEGREE  (if applicable) | Completion Date  MM/YYYY | FIELD OF STUDY |
| --- | --- | --- | --- |
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**Please refer to the Biographical Sketch sample in order to complete sections A, B, C, and D of the Biographical Sketch.**

Public reporting burden for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. **An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.** Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: NIH, Project Clearance Branch, 6705 Rockledge Drive, MSC 7974, Bethesda, MD 20892-7974, ATTN: PRA (0925-0001 and 0925-0002). Do not return the completed form to this address.

**Appendix B**

OMB No. 0925-0001 and 0925-0002 (Rev. 10/15 Approved Through 10/31/2018)

BIOGRAPHICAL SKETCH

Provide the following information for the Senior/key personnel and other significant contributors.  
Follow this format for each person. **DO NOT EXCEED FIVE PAGES**.

NAME: Hunt, Morgan Casey

eRA COMMONS USER NAME (credential, e.g., agency login): huntmc

POSITION TITLE: Associate Professor of Psychology

EDUCATION/TRAINING (Begin with baccalaureate or other initial professional education, such as nursing, include postdoctoral training and residency training if applicable. Add/delete rows as necessary.)

| INSTITUTION AND LOCATION | DEGREE  (if applicable) | Completion Date  MM/YYYY | FIELD OF STUDY |
| --- | --- | --- | --- |
| University of California, Berkeley | B.S | 05/1990 | Psychology |
| University of Vermont | Ph.D. | 05/1996 | Experimental Psychology |
| University of California, Berkeley | Postdoctoral | 08/1998 | Public Health and Epidemiology |
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# A. Personal Statement

I have the expertise, leadership, training, expertise and motivation necessary to successfully carry out the proposed research project. I have a broad background in psychology, with specific training and expertise in ethnographic and survey research and secondary data analysis on psychological aspects of drug addiction. My research includes neuropsychological changes associated with addiction. As PI or co-Investigator on several university- and NIH-funded grants, I laid the groundwork for the proposed research by developing effective measures of disability, depression, and other psychosocial factors relevant to the aging substance abuser, and by establishing strong ties with community providers that will make it possible to recruit and track participants over time as documented in the following publications. In addition, I successfully administered the projects (e.g. staffing, research protections, budget), collaborated with other researchers, and produced several peer-reviewed publications from each project. As a result of these previous experiences, I am aware of the importance of frequent communication among project members and of constructing a realistic research plan, timeline, and budget. The current application builds logically on my prior work. During 2005-2006 my career was disrupted due to family obligations. However, upon returning to the field I immediately resumed my research projects and collaborations and successfully competed for NIH support.

1. Merryle, R.J. & Hunt, M.C. (2004). Independent living, physical disability and substance abuse among the elderly. Psychology and Aging, 23(4), 10-22.
2. Hunt, M.C., Jensen, J.L. & Crenshaw, W. (2007). Substance abuse and mental health among community-dwelling elderly. International Journal of Geriatric Psychiatry, 24(9), 1124-1135.
3. Hunt, M.C., Wiechelt, S.A. & Merryle, R. (2008). Predicting the substance-abuse treatment needs of an aging population. American Journal of Public Health, 45(2), 236-245. PMCID: PMC9162292 Hunt, M.C., Newlin, D.B. & Fishbein, D. (2009). Brain imaging in methamphetamine abusers across the life-span. Gerontology, 46(3), 122-145.

# B. Positions and Honors

## Positions and Employment

1998-2000 Fellow, Division of Intramural Research, National Institute of Drug Abuse, Bethesda, MD

2000-2002 Lecturer, Department of Psychology, Middlebury College, Middlebury, VT

2001- Consultant, Coastal Psychological Services, San Francisco, CA

2002-2005 Assistant Professor, Department of Psychology, Washington University, St. Louis, MO

2007- Associate Professor, Department of Psychology, Washington University, St. Louis, MO

## Other Experience and Professional Memberships

1995- Member, American Psychological Association

1998- Member, Gerontological Society of America

1998- Member, American Geriatrics Society

2000- Associate Editor, Psychology and Aging

2003- Board of Advisors, Senior Services of Eastern Missouri

2003-05 NIH Peer Review Committee: Psychobiology of Aging, ad hoc reviewer

2007-11 NIH Risk, Adult Addictions Study Section, members

## Honors

2003 Outstanding Young Faculty Award, Washington University, St. Louis, MO

2004 Excellence in Teaching, Washington University, St. Louis, MO

2009 Award for Best in Interdisciplinary Ethnography, International Ethnographic Society

# C. Contribution to Science

1. My early publications directly addressed the fact that substance abuse is often overlooked in older adults. However, because many older adults were raised during an era of increased drug and alcohol use, there are reasons to believe that this will become an increasing issue as the population ages. These publications found that older adults appear in a variety of primary care settings or seek mental health providers to deal with emerging addiction problems. These publications document this emerging problem but guide primary care providers and geriatric mental health providers to recognize symptoms, assess the nature of the problem and apply the necessary interventions. By providing evidence and simple clinical approaches, this body of work has changed the standards of care for addicted older adults and will continue to provide assistance in relevant medical settings well into the future. I served as the primary investigator or co-investigator in all of these studies.
   1. Gryczynski, J., Shaft, B.M., Merryle, R., & Hunt, M.C. (2002). Community based participatory research with late-life addicts. American Journal of Alcohol and Drug Abuse, 15(3), 222-238.
   2. Shaft, B.M., Hunt, M.C., Merryle, R., & Venturi, R. (2003). Policy implications of genetic transmission of alcohol and drug abuse in female nonusers. International Journal of Drug Policy, 30(5), 46-58.
   3. Hunt, M.C., Marks, A.E., Shaft, B.M., Merryle, R., & Jensen, J.L. (2004). Early-life family and community characteristics and late-life substance abuse. Journal of Applied Gerontology, 28(2),26-37.
   4. Hunt, M.C., Marks, A.E., Venturi, R., Crenshaw, W. & Ratonian, A. (2007). Community-based intervention strategies for reducing alcohol and drug abuse in the elderly. Addiction, 104(9), 1436-1606. PMCID: PMC9000292
2. In addition to the contributions described above, with a team of collaborators, I directly documented the effectiveness of various intervention models for older substance abusers and demonstrated the importance of social support networks. These studies emphasized contextual factors in the etiology and maintenance of addictive disorders and the disruptive potential of networks in substance abuse treatment. This body of work also discusses the prevalence of alcohol, amphetamine, and opioid abuse in older adults and how networking approaches can be used to mitigate the effects of these disorders.
   1. Hunt, M.C., Merryle, R. & Jensen, J.L. (2005). The effect of social support networks on morbidity among elderly substance abusers. Journal of the American Geriatrics Society, 57(4), 15-23.
   2. Hunt, M.C., Pour, B., Marks, A.E., Merryle, R. & Jensen, J.L. (2005). Aging out of methadone treatment. American Journal of Alcohol and Drug Abuse, 15(6), 134-149.
   3. Merryle, R. & Hunt, M.C. (2007). Randomized clinical trial of cotinine in older nicotine addicts. Age and Ageing, 38(2), 9-23. PMCID: PMC9002364
3. Methadone maintenance has been used to treat narcotics addicts for many years but I led research that has shown that over the long-term, those in methadone treatment view themselves negatively and they gradually begin to view treatment as an intrusion into normal life. Elderly narcotics users were shown in carefully constructed ethnographic studies to be especially responsive to tailored social support networks that allow them to eventually reduce their maintenance doses and move into other forms of therapy. These studies also demonstrate the policy and commercial implications associated with these findings.

1. Hunt, M.C. & Jensen, J.L. (2003). Morbidity among elderly substance abusers. Journal of the Geriatrics, 60(4), 45-61.
2. Hunt, M.C. & Pour, B. (2004). Methadone treatment and personal assessment. Journal Drug Abuse, 45(5), 15-26.
3. Merryle, R. & Hunt, M.C. (2005). The use of various nicotine delivery systems by older nicotine addicts. Journal of Ageing, 54(1), 24-41. PMCID: PMC9112304
4. Hunt, M.C., Jensen, J.L. & Merryle, R. (2008). The aging addict: ethnographic profiles of the elderly drug user. NY, NY: W. W. Norton & Company.

## Complete List of Published Work in MyBibliography: <http://www.ncbi.nlm.nih.gov/sites/myncbi/collections/public/1PgT7IEFIAJBtGMRDdWFmjWAO/?sort=date&direction=ascending>

# D. Research Support

## Ongoing Research Support

R01 DA942367 Hunt (PI) 09/01/08-08/31/16

Health trajectories and behavioral interventions among older substance abusers

The goal of this study is to compare the effects of two substance abuse interventions on health outcomes in an urban population of older opiate addicts.

Role: PI

R01 MH922731 Merryle (PI) 12/15/07-11/30/15

Physical disability, depression and substance abuse in the elderly

The goal of this study is to identify disability and depression trajectories and demographic factors associated with substance abuse in an independently-living elderly population.

Role: Co-Investigator

Faculty Resources Grant, Washington University 08/15/09-08/14/15

Opiate Addiction Database

The goal of this project is to create an integrated database of demographic, social and biomedical information for homeless opiate abusers in two urban Missouri locations, using a number of state and local data sources.

Role: PI

## Completed Research Support

R21 AA998075 Hunt (PI) 01/01/11-12/31/13

Community-based intervention for alcohol abuse

The goal of this project was to assess a community-based strategy for reducing alcohol abuse among older individuals.

Role: PI

**Appendix C**

**GILEAD SCIENCES, INC.**

**ANTI-CORRUPTION AND ANTI-BRIBERY POLICY**

**(AS AMENDED ON JANUARY 22, 2015)**

**1. Purpose of Policy**

At Gilead, we are committed to the highest standards of ethics and integrity in all our activities. This policy (“**Anti-Corruption Policy**”) sets forth Gilead’s commitment to ensure that Gilead, its affiliates, and others acting on Gilead’s behalf abide by all international and local anti-corruption and anti-bribery laws in countries in which Gilead conducts business. As elaborated below, the use of Gilead funds or resources for any unlawful or unethical purpose is strictly prohibited.

**2. Scope**

This policy applies to all employees, officers, directors and contractors of Gilead and its affiliates, as well as any other individual or entity acting for or on behalf of Gilead, including Third Party Representatives (as defined below) such as distributors. Many affiliates also have policies, procedures, and guidelines specific to their operations, such as local Business Conduct Manuals, and Business Conduct Policies and related SOPs, which employees within those affiliates are also expected to follow.

**3. Definitions**

**“Anti-Corruption Laws”** – This term refers to international and local laws that collectively prohibit the provision (and attempted provision) of bribes to public officials and private individuals in order to secure an improper business advantage, such as the use or recommendation of our products, or other favorable decision relating to our business. Such laws include the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, as well as local laws prohibiting bribery and corrupt payments. Bribes are not limited to cash payments and may involve anything of value. These laws also commonly require companies to enact an adequate system of internal financial controls, and keep accurate and detailed books and records. Violation of these laws may be punishable by fines and imprisonment, and individual liability may extend to those planning, carrying out, or condoning prohibited acts.

**“Anything of Value” –** As used this policy, this term includes not only cash and cash equivalents, but also consulting agreements, speaker fees, research agreements, trips, favors, entertainment, donations, gifts, and services. Value is not based on retail value, but whether the recipient subjectively attaches value to the item or service.

**“Third Party Representative”** – As used in this policy, this term refers to one who is authorized to act for or on behalf of Gilead, and includes distributors, regulatory agents, advisors, consultants, clinical research organizations, market research firms, meeting planners, subcontractors, agents, service providers, brokers, and other third parties, as well as their employees, acting for or on behalf of Gilead.

**4. Policy**

As a company whose products are distributed throughout the world, Gilead, its affiliates and others acting on Gilead’s behalf must be aware of, and ensure compliance with, all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (commonly referred to as the FCPA), U.K. Bribery Act, as well as local laws, that collectively prohibit the payment of bribes to public officials and private individuals (“**Anti-Corruption Laws**”).

Any employee or Third Party Representative who violates Gilead’s Anti-Corruption Policy or Anti-Corruption Laws will be disciplined and may be terminated. In addition, it is important to note that violations of Anti-Corruption Laws may trigger personal criminal liability.

A. **Prohibited Payments**

Bribery of any kind to any person is strictly prohibited. Gilead employees and Third Party Representatives are prohibited from giving or receiving (or attempting to give or receive) bribes or anything of value, directly or indirectly, for the benefit of any person that is or may appear to be related to obtaining or retaining business, or acquiring any other improper business advantage. It is prohibited to provide (or attempt to provide) bribes or kickbacks aimed at influencing the decision of any person in his or her official or professional capacity. Gilead employees and Third Party Representatives are also prohibited from soliciting or receiving any such payments or benefits under our Conflict of Interest policy.

Below are examples of situations where particular care needs to be taken to ensure that our activities comply with company policies and do not violate any local laws.

* + **Consulting Arrangements with Healthcare Professionals**

Consulting arrangements with healthcare professionals, including speaker engagements, may only be entered into if permitted by applicable laws, provide compensation not exceeding fair market value, and are necessary to address a bona fide and legitimate business need. Employees must follow the specific policies, procedures, and guidelines of their operating unit regarding approvals and reporting of such consulting arrangements, including those contained in local Business Conduct manuals, policies, SOPs and related materials.

* + **Gifts, Hospitality, and Entertainment**

Gifts, hospitality, and entertainment may only be provided if permitted by applicable laws, are of a reasonable and customary value, and made for a legitimate business purpose. Many jurisdictions may prohibit or strictly limit the value of any gifts, hospitality, or entertainment that may be provided to local government officials or public employees.

No gifts, hospitality or entertainment may be provided if doing so may inappropriately influence, is intended to inappropriately influence, or may appear to inappropriately influence, the decision of a person or group of people to purchase, prescribe, use, recommend, or otherwise provide favorable treatment to Gilead or in relation to Gilead products. Reasonable hospitality incidental to legitimate business meetings is permitted. Toward that end, employees must follow the specific policies, procedures, and guidelines of their operating unit regarding approvals and reporting of hospitality and entertainment expenses, including those contained in local Business Conduct manuals, policies, SOPs and related materials. Third Party Representatives must follow policies, procedures, and guidelines specified by Gilead.

* + **Sponsorships and Donations**

Likewise, sponsorships and donations may only be provided if permitted by applicable laws, are of a reasonable value, and made in direct support of a legitimate business purpose, such as supporting medical education or improving patient welfare. Some jurisdictions prohibit or strictly limit the nature or value of sponsorships that may be provided to local government officials or public employees.

Sponsorships or donations may not be provided if doing so may influence, is intended to influence, or may appear to influence, the decision of a person or group of people to purchase, prescribe, use, recommend, or otherwise provide favorable treatment to Gilead or in relation to Gilead products. Employees must follow the specific policies, procedures, and guidelines of their operating unit regarding approvals and reporting of sponsorship expense and donations, including those contained in local Business Conduct manuals, policies, SOPs and related materials. Third Party Representatives must follow policies, procedures, and guidelines specified by Gilead.

* + **Facilitation Payments**

Gilead prohibits the making of “facilitation payments,” which are small payments (sometimes referred to as “tips”) to individuals to expedite routine government actions. By contrast, expediting payments made to a government agency itself (not to an individual) that have been officially authorized (such as an official fee to expedite passport renewal) are not facilitation payments and, accordingly, are permissible.

B. **Retention and Oversight of Third Party Representatives**

Gilead can face liabilities relating to violations of Anti-Corruption laws, even in situations in which it is unaware that illegal payments have been made. Gilead’s reputation for conducting its business using only legal and ethical means could be undone by a single act of a third party that the company has chosen as its representative. Accordingly, Gilead’s commitment to the highest standards of ethics must extend to the activities of its Third Party Representatives.

Gilead engages Third Party Representatives, such as consultants, distributors, clinical research organizations, and manufacturing organizations, to provide services for or on behalf of the company in the course of its business. Gilead employees who retain Third Party Representatives must ensure that the amount that Gilead pays does not exceed the fair market value of products or services being purchased.

Prior to engaging a Third Party Representative, Gilead shall conduct reasonable due diligence regarding the proposed Third Party Representative if required and in accordance with due diligence standards contained in local processes, SOPs and related materials. The level of due diligence depends on the nature of services provided and other circumstances, and may include questionnaires to be completed by the Representative, interviews, and background checks. For guidance on what type of due diligence may be required, or what steps need to be taken on due diligence findings, please visit the Due Diligence Portal on GNET (accessible through the Legal Department’s GNET page) or contact Gilead’s Legal Department.

As may be appropriate, Third Party Representatives shall also be informed of Gilead’s Anti-Corruption Policy and agree to comply with the Policy, additional guidelines and requirements set by Gilead, and all relevant Anti-Corruption Laws. As appropriate, Gilead will periodically update its due diligence, provide training, require certifications of anti-corruption compliance, and perform audits of certain Third Party Representatives. As set forth below, Gilead employees and Third Party Representatives are required to monitor and take appropriate action if there are potential signs of corruption or bribery risk.

C. **Potential Signs of Corruption or Bribery Risk**

No employee or Third Party Representative may ignore suspicious behavior by others. In conducting Gilead’s business affairs, employees and Third Party Representatives must be vigilant towards certain factors that may signal the possibility of a bribery or corruption risk, including but not limited to:

* + Threats that Gilead representatives will be denied access to hospitals or clinics unless benefits are provided;
  + Promises of support for Gilead treatment strategies or products in exchange for benefits;
  + Requests for payments in cash, to a third party, or to an account that is not domiciled in the country of the payee or where the transaction takes place;
  + Requests for excessive compensation;
  + Consulting agreements with only vaguely described services;
  + Third parties with close relations to or associations with government officials;
  + Suggestion of favorable treatment in exchange for use of a particular local vendor or supplier; and
  + Past violations of applicable laws.

D. **Recordkeeping**

All payments by Gilead and its Third Party Representatives must be supported by proper documentation, such as receipts and invoices. As mandated by Anti-Corruption Laws, including the books and records requirements of the U.S. Foreign Corrupt Practices Act, records including support documentation must be kept in reasonable detail to accurately and fairly reflect all business affairs and transactions. Additionally, records of all transactions should reflect execution in accordance with internal policies and professional accounting standards. The mischaracterization or omission of any transaction on Gilead’s books or those of its Third Party Representatives is prohibited.

**5. Responsibilities**

This Anti-Corruption Policy requires all Gilead personnel to (1) become familiar with the mandates set forth above, (2) comply with the mandates, and (3) report immediately potential, actual or suspected violations to Gilead’s Legal Department.

If a co-worker or a Third Party Representative is taking actions or may be considering taking actions that are suspicious and that you think may be a violation of Anti-Corruption Laws or this policy, it is your obligation to report this immediately to Gilead’s Legal Department, using the Complaint Procedure and Non-Retaliation Policy, or in accordance with specific local reporting procedures. Keep in mind that you may have additional reporting obligations imposed by the specific guidelines of your particular department or operating unit.

Failure to abide by the provisions of this policy, including the reporting requirement, may lead to disciplinary sanctions, including but not limited to termination.

This Policy will be communicated in writing to all employees and through training of senior managers and other relevant employees on a regular basis.

**6. Where to Get Help**

You are strongly encouraged to ask any questions that you may have regarding Anti-Corruption Laws or an action that you feel might be in violation of such laws. These questions should be directed to Gilead’s Legal Department. It is particularly important that you use your best judgment at all times and ask for advice from the Legal Department before taking any action that you feel could be a violation of Anti-Corruption Laws. We encourage you always to err on the side of caution and seek guidance on any situation that may present corruption or bribery risk.

If you believe that the Anti-Corruption policy was or may have been violated, you should immediately contact Gilead’s Legal Department, Gilead’s Ethics Committee, Gilead’s Ethics Hotline using the provided local access number or through GNET, or follow local procedures on reporting potential violations. The Ethics Hotline may be dialed 24 hours a day, 365 days a year, and, in most countries, toll-free. Reports will be handled in accordance with Gilead’s Complaint Procedure and Non-Retaliation Policy.