

ASTRAZENECA GLOBAL POLICY

COMMUNICATIONS

THIS POLICY SETS OUT THE GLOBAL REQUIREMENTS FOR COMMUNICATIONS WITH OUR STAKEHOLDERS AND OTHERS WHO HAVE AN INTEREST IN THE COMPANY AND ITS ACTIVITIES, RANGING FROM OUR CUSTOMERS TO THE GENERAL PUBLIC.

IT COVERS COMMUNICATIONS ABOUT OUR PRODUCTS, PUBLIC POLICY COMMUNICATIONS, MEDIA COMMUNICATIONS AND THE USE OF CORPORATE AND PRODUCT BRANDS, AND IT INCLUDES ELECTRONIC COMMUNICATIONS.

WHO IS THIS POLICY FOR?

Everyone who communicates on behalf of the Company (including external agencies acting on our behalf).

All staff should bear in mind that in any situation in which you are communicating with the external world, you might be perceived to be (or, in the eyes of the law, deemed to be) communicating on behalf of the Company.

All staff should also bear in mind that their internal communications can be subject to external scrutiny.

To give effect to this Policy, **all SET areas** are expected to follow any global standards and procedures or, provided they are consistent with this Policy, their own local or functional standards and procedures.

Third parties who communicate on the Company's behalf must also comply with this Policy.

KEY POLICY POINTS

- > This Policy applies to all communications that are, or may be deemed or perceived to be, on behalf of the Company, whether written, oral, electronic or hard copy ("Company Communications").
- > Company Communications include communications with the general public, the media, patients, staff, healthcare professionals and organisations and other customers, investors, governments, non-governmental organisations and other public bodies, stakeholders and third parties.
- > All Company Communications must be made by an authorised employee or agent and go through the appropriate internal approval procedure.
- > All Company Communications must be fair, complete, accurate and not misleading, either through inclusion or omission.
- > All Company Communications must be consistent with any previously approved global position on the subject or issue.
- > All Company Communications that incorporate a Company or product brand or trademark must comply with the appropriate brand and trademark guidelines.
- > The many communications among staff and with third parties that form part of our day-to-day business activity are subject to certain exemptions from this Policy. See the "Approval of Communications" and "Communicating as part of our day-to-day business activity" sections.
- > All staff need to be aware that, in certain situations when acting in what you may consider to be a personal capacity, you may be perceived to be or, in the eyes of the law, deemed to be speaking on behalf of the Company (e.g. personal use of a Company computer and email address, discussing the Company's products or personal speaking engagements). These communications are considered Company Communications and the requirements of this Policy apply.
- > There are only limited circumstances (such as identifying your employer in a personal profile, personal private conversations, personal medical matters and personal reports), in which personal communications that mention the Company, our products, staff, competitors or other third parties would not be considered as Company Communications.

APPROVAL OF COMMUNICATIONS

All Company Communications must receive internal approval, as required by applicable global, local, SET area or functional policies or procedures. On occasions when the procedures of two or more functions or locations apply, the stricter procedure must be applied.

Potentially material, non-public information (i.e. that could be considered influential in making a decision to buy or sell securities) must be communicated to the AstraZeneca Disclosure Committee, via the VP of Investor Relations or the Deputy Company Secretary at the Corporate Head Office, for a judgement as to materiality and approval prior to any disclosure.

Confidential information, any information marked or intended only for internal communication or use within the Company, and any other information obtained during the course of employment, must not be disclosed or used in any Company Communication without prior approval, nor in any personal communication.

The Company's intellectual property, including any trademarks, copyrights, or other intellectual property, must not be used in any communications that are

unrelated to official Company business without prior approval in accordance with applicable procedures.

All relevant approvals must be sought for speaking engagements, if you are, or may be perceived to be, communicating on behalf of the Company. Scientific, technical and medical communications must receive internal approval as required by applicable global, local or SET area procedures, such as the Scientific, Technical and Medical Publications Policy. To communicate on other topics, approval must be obtained from your manager.

When employees are taking part in discussions in a public forum and are required to give a personal opinion, they should ensure that any responses provided do not contradict Company statements and do not reflect badly on the Company, and they should make clear that their opinions are their own, not the Company's.

When employees are planning to take part in discussions in a public forum or involved in external speaking engagements, they should consider the potential security risks and consult with Global Security if they have any concerns or questions about such risks.

PROVIDING PRODUCT INFORMATION

Specific functions are responsible for providing certain types of Company product information. For example: some communications about the safety and efficacy of our medicines are restricted to functions such as Regulatory and Medical Affairs; R&D publishes scientific data in appropriate ways, and sales forces provide product information to prescribers, using approved communications methods and materials.

These communications are governed by very specific standards and procedures, which you must be aware of and comply with, if they apply to the communication

you intend to make. They include the Global Policy: External Interactions, Global Policy: Providing Information about our Products, the Global Standard: Press Releases and Media Material and the Scientific, Technical and Medical Publications Policy.

All staff need to be aware that any communication about any Company product, a competitor product or a disease area, or indication for which we have a current or potential product, constitutes a Company Communication, to which this Policy applies.

PUBLIC POLICY COMMUNICATIONS

Communications with governments, non-governmental organisations and other public bodies to inform or influence public policy are also managed by specific functions, including Government Affairs

and R&D Science Policy and Regulatory Affairs, who, in addition to this Policy, must operate to specific standards and procedures.

MEDIA COMMUNICATIONS

Communications with or through the media must be conducted by, or with the support of, the designated communications professional in your area.

All requests from the media for information, including interviews, should be referred to and managed by the

relevant communications professional. All press releases and other communications with or through the media relating to products, development compounds or diseases must also comply with applicable global or SET areas standards, such as the Global Standard: Press Releases and Media Material

CRISIS COMMUNICATIONS

In the event of a crisis (an unplanned event which impacts, or has the potential to impact business continuity and/or our reputation), communications must be managed in line with the prescribed

escalation process and other provisions of the applicable global or SET area standards, such as the Global Standard: Crisis Management.

ELECTRONIC COMMUNICATIONS

Electronic communications are subject to the same rules that apply to all Company Communications and therefore must comply with the requirements of this Policy and all relevant supporting policies.

Electronic communications include telephone, voicemail, e-mail, electronic file transfer, instant messaging (electronic chat), electronic conferencing and electronic collaboration tools. They also include digital communications such as internet forums and tools such as web logs (internet diaries or blogs), social networking sites, wikis and virtual worlds. Staff should be aware that some of these communications media are subject to more specific Company or

functional restrictions, which must be followed wherever they apply. In particular, staff must also comply with the applicable global or SET area standards for computer use and electronic communications, such as the Computer Usage Policy and Global Standards: Digital Media Communications.

Subject to your local law, you should not have any expectation of privacy in electronic communications, whether business-related or personal, that are created, accessed, analysed, transmitted, stored or distributed using Company equipment, systems or networks.

COMMUNICATING AS PART OF OUR DAY-TO-DAY BUSINESS ACTIVITY

The requirements of this Policy regarding internal approval do not apply to our communications with each other, and any third party, when such communications are a reasonable and necessary part of our day-to-day business activity (e-mail, hand-written notes, phone calls etc), consistent with our individual roles and authority. However, all communications can be subject to external scrutiny, including disclosure in litigation and other proceedings, and therefore all staff must ensure that all their communications are appropriate and in line

with all relevant requirements of this Policy and the AstraZeneca Code of Conduct.

In addition, the requirements of this Policy for communications to be accurate and consistent with previously agreed global positions are not intended to prevent legitimate and well-informed discussion in relation to informal, day-to-day business activities, nor to inhibit the proper and appropriate exchange of information when staff act as nominated Company representatives on professional or similar bodies.

DIGITAL MEDIA COMMUNICATIONS

AstraZeneca externally facing digital media communications¹ are subject to specific approvals to ensure compliance with applicable standards including the Global Standards: Digital Media Communications. Approvals must cover acceptability of content, security and business justification.

- > All Company digital media communications must be recorded in the company's global inventory for digital media communications.
- > Digital media communications, including their content, must be reviewed and re-approved periodically and, where necessary, updated to ensure that these communications continue to provide the benefits outlined in the original business case and that information remains current and compliant; such reviews must be conducted in accordance with the requirements outlined in the Global Standards: Digital Media Communications.
- > Digital media communications that no longer serve a regulatory, medical, or patient purpose etc. must be withdrawn in a timely and orderly fashion in accordance with the Global Standards: Digital Media Communications.

- > All AstraZeneca digital media communications must comply with all applicable functional or local standards and any global or SET area standards, including the Global Standards: Digital Media Communications, and the Global Policy on External Interactions.
- > Digital media communications must have a nominated business owner throughout their life-cycle, who is responsible for ensuring that these communications are appropriately approved and compliant with this Policy and any other relevant global policies, functional or local standards.

Any digital media communication that does not comply with these requirements or has not been appropriately approved will be taken down.

These requirements do not apply to the submission of social media contributions or posts on internal AstraZeneca sites or forums.

¹ AstraZeneca digital media communications are created by or on behalf of the Company and includes sites where we have a degree of editorial control or influence over the content. 'Digital media communication' is defined as an externally facing AstraZeneca digital communication or communication channel, such as Company social media activity, website, mobile site, application or online banner advertisement.

CORPORATE BRAND IDENTITY

AstraZeneca's positioning, Health Connects Us All, sits at the heart of our global business and should be reflected in all our communications.

The use of corporate and product brands in both internal and external communications is governed by specific standards and guidance available from OnBrand (www.onbrand.astrazeneca.com) and in the relevant product brand guides. This covers all internal, external and digital communications,

including advertising, collateral materials and social media.

The use of the AstraZeneca name or identity in communications by our suppliers is subject to a specific approval process as set out in the Supplier use of AZ name and identity guidelines, also available on OnBrand.

MedImmune Corporate Affairs must be consulted regarding such activity relating to the MedImmune identity.