

Anti-Bribery & Anti-Corruption Policy

Scope of Policy

1.1 This anti-bribery policy sets out the responsibilities of PM Healthcare and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption.

1.2 It also exists to act as a source of information and guidance for those working for us to help them recognise and deal with bribery and corruption, as well as understand their responsibilities.

Policy statement

2.1 We are committed to conducting business in an ethical and honest manner, and to implementing and enforcing systems that ensure bribery is prevented. PM Healthcare has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever we operate.

2.2 We will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regard to our conduct both at home and abroad.

2.3 We recognise that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

Who is covered by the policy?

3.1 This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, agents, sponsors, or any other person or persons associated with us (including third parties), no matter where they are located. The policy also applies to Board members.

3.2 In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

3.3 Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

Definition of bribery

4.1 Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or an advantage so to induce or influence an action or decision.

4.2 A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

4.3 Bribery is not limited to the act of offering a bribe. An individual who accepts a bribe is also breaking the law.

4.4 Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively, or through a third party. They must not bribe a foreign public official anywhere in the world. They must not accept bribes and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek advice from the Chairman.

What is and what is NOT acceptable

5.1 This section of the policy refers to 4 areas:

- Gifts and Hospitality
- Facilitation payments.
- Political contributions.
- Charitable contributions.

Gifts and hospitality

5.2 PM Healthcare accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local law.
- It is given in the name of the company, not in an individual's name.
- It is appropriate for the circumstances (e.g. giving small gifts around Christmas).

- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- It is given and received openly, not secretly.
- It is not above a certain excessive value, as pre-determined by the Chairman (usually in excess of £100).
- It is not offered to, or accepted from, a government official or representative or politician or political party.

5.3 Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Chairman, who will assess the circumstances.

5.4 PM Healthcare recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

5.5 As good practice, gifts given and received should always be disclosed to the Chairman. Gifts from suppliers should always be disclosed.

5.6 The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Chairman should be sought.

Facilitation Payments and Kickbacks

5.7 The company does not accept and will not make any form of facilitation payments of any nature. Facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action.

5.8 The company does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

Political Contributions

5.9 The company will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

Charitable Contributions

5.10 PM Healthcare accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

5.11 Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

5.12 We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered without the approval of the Chairman.

Employee Responsibilities

6.1 Employees must ensure that they read, understand, and comply with this policy, and with any training or other anti-bribery and corruption information given.

6.2 All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

6.3 If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Chairman.

6.4 If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. The company has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

What happens if I need to raise a concern?

7.1 This section of the policy covers 3 areas:

- How to raise a concern.
- What to do if you are a victim of bribery or corruption.
- Protection.

7.2 If you suspect that there is an instance of bribery or corrupt activities, you are encouraged to raise your concerns at as early a stage as possible. If you are uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to the Chairman.

7.3 The company will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

What to do if you are a victim of bribery or corruption

7.4 You must tell the Chairman as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

Protection

7.5 PM Healthcare will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

7.6 The company will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

7.7 If you have reason to believe you have been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform the Chairman immediately.

Training and communication

8.1 PM Healthcare will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked to formally accept that they will comply with this policy.

8.2 This anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.

Record keeping

9.1 The company will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.

Monitoring and reviewing

10.1 The Chairman is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis to assess its suitability, adequacy, and effectiveness.

10.2 Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved.

10.3 This policy does not form part of an employee's contract of employment and the company may amend it at any time so to improve its effectiveness at combatting bribery and corruption.