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POLICY STATEMENT

- 1.1 At the Bionical Health Limited, it is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate, and to implementing and enforcing effective systems to counter bribery and corruption.
- 1.2 As we are UK-based, we are bound by UK laws, including the Bribery Act 2010, in respect of our conduct both at home *and* abroad. Likewise, although the US Foreign Corrupt Practices Act ("**FCPA**") does not specifically apply to us, many of our UK customers do have links to US companies. If so, they may require us to comply with FCPA, in relation to activities both inside and outside the US. Accordingly, we are also committed to compliance with FCPA and its principles.
- 1.3 We take a zero-tolerance stance on anti-bribery and corruption for ethical reasons. However, we must also bear in mind the legal consequences (both to our business and to our staff) of anti-bribery violations, as follows:
 - a) Individuals, including staff members
It is a criminal offence to offer, promise, give, request, or accept a bribe. In the UK, individuals found guilty can be punished by up to ten years' imprisonment and/or a fine.
 - b) Our liability as a company

As a business, if we commit bribery offences, condone bribery or fail to prevent bribery we can face criminal prosecution too, with penalties including unlimited fines, exclusion from tendering for public contracts, and damage to our reputation. Any such events could be catastrophic to our business.

We therefore take our legal responsibilities, as well as our ethical responsibilities, very seriously.

ABOUT THIS POLICY

- 2.1 The purpose of this policy is to:
- (a) set out the main elements of our anti-bribery and corruption programme;
 - (b) set out our responsibilities, and responsibilities of those working for us, in observing and upholding our position on bribery and corruption; and
 - (c) provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.
- 2.2 In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.
- 2.3 This policy does not form part of any employee's contract of employment and accordingly we may amend it at any time. However, it is a condition of all of our employees' contracts of employment that they must comply with our policies, including this one, in effect from time to time.

WHO MUST COMPLY WITH THIS POLICY?

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, consultant/freelance workers, agency workers, seconded workers, volunteers, interns, work-experience placements, agents, contractors, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located. In our case, this extends to our third-party sub-contractors, in the UK, the USA or elsewhere.

WHO IS RESPONSIBLE FOR THE POLICY?

- 4.1 The board of directors of Bionical Health Limited has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 4.2 The Legal function via the QA Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering bribery and corruption.
- 4.3 Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it.
- 4.4 All staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the QA Director who will link in with the Legal function for support.

WHAT ARE BRIBERY AND CORRUPTION?

- 5.1 *Bribery* is offering, promising, giving, asking for, or accepting any financial or other *advantage*, to induce the recipient or any other person to *act improperly* in the performance of their functions, or to reward them for *acting improperly*, or where the recipient would *act improperly* by accepting the advantage. For examples, please see the box below.
- 5.2 An *advantage* includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract, even charitable donations, or anything else of value.
- 5.3 A person *acts improperly* where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The *improper acts* may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.
- 5.4 *Corruption* is the abuse of entrusted power or position for private gain.

Examples:
Offering a bribe
<p>You offer a potential client tickets to a major sporting event, but only if they agree to do (or expand or extend) business with us.</p> <p><i>YOU have committed a bribery offence, as you made the offer to gain a commercial and contractual advantage. WE, the company, may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential CLIENT to accept your offer.</i></p>
Receiving a bribe
<p>A supplier gives your son a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.</p> <p><i>It is an offence for a SUPPLIER to make such an offer. It would be an offence for YOU to accept the offer as you would be doing so to gain a personal advantage. Again WE, the company, may be liable too.</i></p>
Bribing a foreign official
<p>You (or a third-party acting on our behalf) arrange for the business to pay an additional "facilitation" payment to a foreign public official to speed up an administrative process, such as expediting the grant of a necessary licence to us.</p> <p><i>The offence of bribing a foreign public official is committed by YOU (or the third party) as soon as the offer is made. This is because it is made to gain a business advantage for us. WE, the company, may also be found to have committed an offence.</i></p>

SPECIFIC BRIBERY AND CORRUPTION RISKS INHERENT IN OUR BUSINESS

- 6.1 We recognise that there are some specific factors inherent in our business from which bribery and corruption risks may arise. These include:
 - a) Jurisdictional risks – we operate primarily in the UK but to a lesser extent more widely, in Europe and elsewhere. Although the UK and most countries in Europe are not considered particularly high risk for bribery and corruption (as evidenced by the annual Transparency International Corruption Perceptions Index), some European countries, such as Italy and Greece, are perceived to be more susceptible to bribery than the UK, the Nordic countries, Germany and the rest of western Europe;
 - b) Sector risks – we operate within the pharmaceutical sector, which has in the past been considered to be relatively high risk for bribery. However, in recent years the pharmaceutical industry has become much more focused on bribery prevention within their organisations. In addition, applicable regulatory bodies have put specific codes of practice in place, to eradicate the offering of improper gifts/hospitality to healthcare professionals, such as the UK's ABPI Code of Practice for the Pharmaceutical Industry.

c) Transactional risks – these include:

i) Public sector

Although our clients are primarily private pharmaceutical and healthcare businesses, we do contract with public sector clients, such as NHS entities and County Councils with public health responsibilities.

Bribery and corruption is perceived as high risk when dealing with the public sector. Furthermore, the Bribery Act 2010, which came into effect on 1 July 2011, introduced the specific new offence of bribing a *foreign* public official.

Accordingly, we must be extra-vigilant when we contemplate business with public bodies.

ii) Third parties – agents and intermediaries

In order to successfully carry out our business activities, we may occasionally use third party intermediaries or agents, especially in countries we do not know well. Use of intermediaries is also perceived to increase bribery and corruption risk; and

iii) Business development and procurement risks

Our own business development activity, and our own activity in procuring goods and services, often involves forming relationships and negotiating with businesses, sometimes outside of UK Bribery Act or FCPA jurisdiction. This activity is essential for our business, but poses a clear potential risk.

6.2 The matters described at clauses 6.1 a) to c) above can generally be classified as external risks, relating to events we may encounter outside of the business. However, we may also face *internal* risks within our business, such as having in place inadequate procedures and/or inadequate staff training and/or inadequate reporting procedures, leading potentially to bribery and corruption ‘red flags’ being missed or inadequately dealt with.

OUR ANTI-BRIBERY AND CORRUPTION PROGRAMME

7.1 In order to manage and counteract our specific perceived risks as set out at Clause 6 above, in addition to managing the general risks universal to all businesses, we have put into place a comprehensive anti-bribery and corruption programme, as follows:

a) People - responsible person plus board level commitment and input

As referred to at Clauses 4.1 and 4.2 above, our board of directors is fully committed to this programme, and anti-bribery and corruption matters are reported upwards to it. We have nominated our CEO as the director responsible for this programme. Our Legal function via the QA Director, is responsible for designing, implementing and monitoring our anti-bribery programme.

b) Full risk assessment

We have carried out a full anti-bribery and corruption risk assessment in relation to our business and its activities, and have used its findings to inform our anti-bribery and corruption programme (including this policy). This risk assessment is reviewed at regular intervals, and also on the business entering into new markets and/or commencing business in new jurisdictions. This policy and the anti-bribery and corruption programme are in turn reviewed and amended to reflect any changes in risk profile.

c) Anti-bribery and corruption policy

We have put this anti-bribery and corruption policy into place. We continue to monitor and review its effectiveness and our compliance with it. As with the risk assessment, as mentioned above, this policy will be regularly reviewed and updated.

d) Implementation, communication and training

We have implemented this policy and are committed to training our employees and applicable third parties on it and its implications. Where applicable, employee training shall take place on induction and at appropriate intervals thereafter. Training may be in person, or via our electronic learning system.

e) Gifts/hospitality

We have put in place systems to ensure that gifts or hospitality (either offered/given or received) do not exceed acceptable levels and/or breach anti-bribery law. We have done this by way of this policy and

our Expenses Policy, setting guidelines, and operating a prior authorisation system. Gift/hospitality registers are kept. More detail on this can be found at clause 10 below.

f) Third party due diligence

We have put in place proportionate measures to check that any third party acting on our behalf will have adequate anti-bribery and corruption measures in place, and is committed to zero tolerance to bribery and corruption, as we are. Clause 13 below deals with this in more detail.

g) Record-keeping

We keep accurate and detailed financial and other records, to ensure we are in a position to properly monitor compliance with our values and policies and can evidence our actions. Clause 14 below deals with record-keeping in more detail.

h) Monitoring, audit and review

We have put in place measures to ensure that monitoring, review and update of our anti-bribery and corruption programme, including this policy, is carried out at appropriate intervals.

WHAT YOU MUST NOT DO

8.1 It is **NOT acceptable** for you (or someone on your behalf) to:

- a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given (accordingly, it would not be acceptable to offer lavish hospitality to a customer, in an attempt to win or retain their business);
- b) give or accept any gift, payment or anything more than necessary hospitality during any commercial negotiations or tender process, as this could be perceived as intended or likely to influence the outcome;
- c) accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it we will provide a business advantage for them or anyone else in return;
- d) accept hospitality from a third party that is unduly lavish or extravagant under the circumstances;
- e) offer or accept hospitality or a gift (including but not limited to cash) to or from government officials or representatives, or politicians or political parties, without the prior approval of one of the CEO;
- f) threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy;
- g) offer or make, or ask for or accept, facilitation payments or "kickbacks" of any kind (for further information on facilitation payments and "kickbacks", please refer to Clause 9 below); or
- h) engage in any other activity that might lead to a breach of this policy.

EXTRA INFORMATION ON FACILITATION PAYMENTS

9.1 In relation to point 8.1 (g) above:

Facilitation payments, also known as "back-handers" or "grease payments", are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official). They are not particularly common in the UK. However, our business operates internationally, and requests for such payments *are* common in some jurisdictions. We must remain wary.

Kickbacks are typically payments made in return for a business favour or advantage.

9.2 Facilitation payments and kickbacks are *always* improper and illegal, irrespective of value. Accordingly, you must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that *might* suggest that such a payment will be made or accepted.

9.3 If you are asked to make what may be a facilitation or kickback payment on our behalf, you should:

- always be mindful of what the payment is for – could it be a genuine official payment request (perhaps for an expedited service), in which case it may be legitimate?
- consider whether the amount requested is proportionate to the value of the service provided
- ask for a receipt which details the reason for the payment

- if still unsure, ask to speak to the payment requester's supervisor or manager, to ascertain the nature of the request
- If you continue to have suspicions, concerns or queries regarding a requested payment, contact your manager (who should raise this with the CEO if he or she does not feel able to make a decision).

9.4 In the very rare situation in which you feel you or others could be at physical risk if you do not make a requested payment, and you have no real alternative, then you are permitted to make the payment, but you must report this to your manager (who must report it to the CEO) as soon after the event as is possible.

EXTRA RULES IN RESPECT OF GIFTS, HOSPITALITY AND EXPENSES

10.1 You should be aware that neither the law, nor our policy, prohibits reasonable and appropriate hospitality – meaning hospitality which is not offered or received with the intent to induce improper behaviour. Accordingly, this policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties (in accordance with this Clause 10, and in particular, Clause 10.6), for the purposes of:

- establishing or maintaining good business relationships;
- improving or maintaining our image or reputation; or
- marketing or presenting our products and/or services effectively.

10.2 To ensure you understand what is permissible and what is not, we set out some rules below. The offering/giving or accepting of a gift or hospitality is allowed ONLY if ALL of the following requirements are met:

- you are authorised by us to make or receive such an offer/gift;
- it is not made with the intention of influencing a third party in order to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it is given/accepted in our (the company's) name, not in your name;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances, taking account of the reason for the gift, its timing and value. E.g. in the UK it is customary for small gifts to be given at Christmas (although be aware that some businesses do not permit their staff to accept *any* gifts/hospitality, whatever the occasion, and you should take this into account when considering offering such, so as not to cause embarrassment);
- it is given openly, not secretly, and you would not feel 'red-faced'/embarrassed if it was widely known about;
- it complies with any applicable local law; and
- you keep a written record of the giver/recipient, the company they represent, the value of the gift/hospitality, and the reason for giving/receiving it.

10.3 Reimbursing a third party's expenses, or accepting an offer to reimburse our expenses (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.

10.4 We appreciate that practice varies between countries and regions and what may be considered normal and acceptable (even expected) in one region may not be in another. The test to be applied is whether in all the circumstances the gift, hospitality or payment is reasonable and justifiable. If you are offering/giving, could it (or do you intend it to) influence the recipient into acting more favourably towards us than they otherwise would have done? If so, it could be seen as a bribe, and is prohibited. The intention should always be considered. The same points should be considered, in reverse, if you are the intended recipient. You should also be mindful of whether a gift/hospitality could be *perceived* by an onlooker as amounting to a bribe. If so, you should decline (or not offer, as the case may be).

10.5 The law does not set particular limits on what is 'acceptable' or 'not acceptable' in terms of gift/hospitality value. That is because, as mentioned above, the law is concerned with intentions and what is proportionate in the circumstances, and those factors vary from case to case. For example, in some countries, industries or situations, an offer of a gift worth £20 may be capable of inducing a person to act improperly (and therefore be a bribe), whereas in some countries, industries or situations an offer of a gift worth £1,000 may not. The acceptable level can be difficult to judge in practice. For this reason, we have set some further guidelines to help you. These are as follows:

a) Gifts/hospitality offered to you/received by you

Generally*, you should not *accept* gifts/hospitality from any supplier (or potential supplier) or customer (or potential customer), or anyone else, without the prior written consent of the CEO. If such gifts are offered to you infrequently by the relevant supplier/client/customer (i.e. less than approximately twice per year) and have a value of less than £100 per gift, the CEO is likely to consent to acceptance.

*However, we do allow you to receive a gift/hospitality *without* CEO consent if you are satisfied that it is not a bribe, and it is of a *very* low value, generally less than £20, and given very infrequently by any one giver. These would include things such as a branded pen, notebook or mug, perhaps some chocolates or flowers as a 'thank you' for a service well-performed, or a drink and/or small snack as part of a business meeting.

b) Gifts offered/made by you

Only those staff who are authorised to *offer* gifts or hospitality to external parties may do so. Usually these will be staff with responsibilities for business development. Such staff should always bear in mind the principles of this policy. As mentioned above, a precise 'acceptable' limit on value of gifts/hospitality cannot meaningfully be set. However, it is likely that if you wish to offer hospitality or gifts, such should not be worth in excess of £100 per intended recipient, and should be offered to the same recipient no more than twice per year. It is also likely that, when offering hospitality to a third party, the cost should not exceed £100 per participant/attendee (with a maximum of 5 participants attending from one business, thereby totalling no more than £500 per business). It is unlikely to be acceptable to repeat hospitality of this kind with a particular business more than twice per year.

If you believe it is appropriate to spend in excess of the amounts set out in these guidelines, or in excess of any budget amount you have been allowed for this purpose, such spend *must* be pre-approved by the CEO in writing, and must be reported to the Business Development Executive for inclusion in the hospitality register.

You should bear in mind that in all cases, even when these thresholds are not exceeded, the intention and proportionality remain paramount. Gifts and hospitality worth less than the threshold amounts *could* be (or could be seen as) bribes, depending on the situation. If so, they should not be offered/made or accepted.

10.6 **Very importantly:**

- a) you may provide services on behalf of a client. If so, you must abide by any rules imposed by the client on the offering or receipt of gifts/hospitality, in addition to our own rules set out in this policy.
- b) Furthermore, if you provide services of a type governed by a code of practice such as the ABPI Code, you **MUST** comply with the applicable code of practice, which may impose much more stringent rules than the rules set out in this policy.

- 10.7 In addition, we have put into effect a hierarchy of safeguards within our systems. For example:
- a) Cash cannot be withdrawn using company credit cards; and
 - b) Cash floats are not permitted, save in exceptional circumstances and with the consent of our Head of Finance;
 - c) Purchase/expense maximum spend amounts are set, triggering additional approval processes for prospective purchases in excess of set levels. (For the avoidance of doubt, all expenses claims must be checked and approved by line managers – please refer to our Expenses Policy).

DONATIONS

- 11.1 As donations to political parties could be perceived to be to achieve undue influence, we do not make contributions to political parties.
- 11.2 Charitable donations can also be (or be perceived to be) violations of anti-bribery law in certain circumstances. In view of this, although we may express our commitment to corporate social responsibility by supporting charities, we will only make charitable donations that are legal and ethical under local laws and practices and no such donation must be offered or made without the prior approval of the CEO.

POTENTIAL RISK SCENARIOS: "RED FLAGS"

- 12.1 The following is a list of possible **red flags** that may arise during the course of your work for us, and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only. If you encounter any of these red flags while working for us, you must report them promptly to your manager, who will (if the manager agrees they are or may be of concern) report them promptly to one of the CEO;
- you become aware that a third party engages in, or has been accused of engaging in, improper business practices;
 - you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;
 - a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
 - a third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
 - a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
 - a third party requests an unexpected additional fee or commission to "facilitate" a service;
 - a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
 - a third party requests that a payment is made to "overlook" potential legal violations;
 - a third party requests that you provide employment or another advantage to a friend or relative;
 - you receive an invoice from a third party that appears to be non-standard or customised;
 - a third party insists on the use of side letters or refuses to put terms agreed in writing;
 - you notice that we have been invoiced for a commission or fee payment that appears excessive given the service stated to have been provided;
 - a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;
 - you are offered an unusually generous gift or offered lavish hospitality by a third party.

THIRD PARTIES WHO ACT ON OUR BEHALF

- 13.1 Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners who may be in a position to act on our behalf, at the outset of our business relationship with them and as appropriate thereafter.
- 13.2 It is possible for us to be liable for bribery and corruption committed by third parties, even if we have no knowledge of such actions. We can become liable for such third party bribery and/or corruption if such third parties are closely associated with us - in effect, acting on our behalf. Accordingly, we are unlikely to be liable for any bribery or corruption carried out without our knowledge by most of the businesses who supply goods or services to us. However, it is possible that we may become liable for bribery and/or corruption carried out by those third parties who *act on our behalf*, which would include any of our sub-contractors. This can be the case even though we do not know about and have not encouraged or condoned such bribery. However, we will not be liable (under the Bribery Act 2010) for such third party actions if we have in place adequate safeguards and procedures to prevent such actions, and if those safeguards and procedures are adhered to.
- 13.3 In order to achieve such safeguards, we endeavour to ensure that such third parties are compliant with this policy, both contractually where reasonably possible, and by requiring such third parties to act in accordance with this policy at all times.
- 13.4 Prior to working with such third parties, we also undertake 'due diligence' to ascertain, so far as reasonably possible, that such third parties are genuine and ethically responsible. The type of due diligence we shall perform is likely to include:
- Personal contact with such third parties' representatives, so that we get to know them;
 - Undertaking an internet search, to verify the third party's credentials, and to discover any previous bribery or corruption allegations relating to the third party;
 - Seeking (and considering the results of) credit checks and references, including both financial and commercial references, where reasonably practicable;
 - Checking with Companies House, or relevant equivalents in other countries, as to the genuineness of the third party;
 - Checking the third party's credentials with any other relevant government or regulatory bodies;
 - Checking with trade associations, quality mark entities and local chambers of commerce (or equivalent), if applicable;
 - Checking of licences, if applicable, in relation to the relevant activities.

RECORD-KEEPING

- 14.1 To ensure that we can evidence our adherence to these principles, and to aid us in monitoring such compliance, we keep financial records and have appropriate internal controls in place in relation to the making of payments to third parties, including (where applicable) detailing the reason for the payment. All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers are prepared with strict accuracy and completeness. Accounts are not kept "off-book" to facilitate or conceal improper payments.
- 14.2 You must declare and keep a written record of all hospitality or gifts given or received by you, which may be subject to managerial review. If required to do so, you must promptly report all hospitality or gifts given or received by you to our Legal counsel or designate, in the format required.
- 14.3 You must submit all expense claims relating to hospitality, gifts or payments to third parties in accordance with our current Expenses Policy and record the reason for expenditure.

YOUR RESPONSIBILITIES

- 15.1 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control.
- 15.2 You must ensure that you read, understand and comply with this policy.
- 15.3 You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 15.4 You must notify us if you believe or suspect that a breach of this policy has occurred, or may occur in the future (please see Clause 16 below).

HOW TO RAISE A CONCERN

- 16.1 You are encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage.
- 16.2 If you are offered a bribe, or are asked to make one, or if you believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your manager as soon as possible. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business, or if you discover one of the "red flags" that may indicate bribery or corruption, or even notice something that simply does not 'feel right' to you, you should always notify your manager immediately.
- 16.3 On receipt of a notification in accordance with Clause 16.2, managers must consider the matter carefully. If the manager agrees that a breach of this policy has occurred or may occur, the manager must notify the CEO immediately.
- 16.4 If you are unsure about whether a particular act constitutes bribery or corruption, raise it with your manager. If managers are unsure, they should raise it with the CEO.
- 16.5 If, for any reason, you are not satisfied with your manager's response, or do not feel that you can raise the matter with your manager, please follow the reporting procedure on the Bionical Health intranet page in the 'reporting links' section.

YOUR PROTECTION

- 16.6 Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing to us, might be worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken.
- 16.7 We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribe or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the CEO immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

BREACHES OF THIS POLICY

16.8 We take breaches of this policy very seriously indeed. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We may terminate our relationship with third parties working on our behalf if they breach this policy.

VERSION HISTORY

Version	Date	Reason for Change	Date of Issue
1	14 th August 2024	New Document	16 th August 2024