

ANTI BRIBERY POLICY

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Change/Review Notes:

Date of Issue/Review	Issue:	Revision No:	Details of Revision
April 2016	1	0	First version
September 2020	1	1	Template rebrand and reg no, auth revised from CEO to MD
March 2021	1	2	Change of sign off to MD and addition of link to guidance on Bribery Act 2010
April 2022	1	2	Reviewed – no changes
April 2023	1	2	Reviewed – no changes

ANTI BRIBERY POLICY

1. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations and in particular the Bribery Act 2010, and to ensure that the Company's business is conducted in a socially responsible manner.

2. Policy statement

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised, or provided to gain any commercial, contractual, regulatory, or personal advantage.

It is the policy of ML Doctors to conduct all its' business in an honest and ethical manner. ML Doctors take a zero-tolerance approach to bribery and corruption. ML Doctors is committed to acting professionally, fairly and with integrity in all its' business dealings and relationships wherever ML Doctors operate and implementing and enforcing effective systems to counter bribery.

ML Doctors will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which the Company operates. However, ML Doctors remains bound by the laws of the UK, including the Bribery Act 2010, in respect of its conduct.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If ML Doctors are found to have taken part in corruption, ML Doctors could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. ML Doctors therefore takes its legal responsibilities very seriously.

3. Scope

3.1 Who is covered by the policy?

In this policy, **third party** means any individual or organisation you encounter during your work for ML Doctors, 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.

This policy applies to all individuals working at all levels and grades, including Senior Managers, Directors, Employees (whether permanent, fixed-term or temporary), Consultants, Contractors, Trainees, Seconded staff, Homeworkers, Casual Workers and Agency staff, Volunteers, interns, Agents, Sponsors, or any other person associated with ML Doctors, or any subsidiaries or their employees, wherever located (collectively referred to as **employees** in this policy).

This policy covers:

- Bribes
- Gifts and hospitality
- Facilitation payments
- Political contributions
- Charitable contributions



3.2 Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Bribes are not necessarily cash incentives but may include gifts, hospitality, or any individual benefits. Examples relating to Medical Reporting could include:

1. An expert offering a member of staff free treatments in return for more instructions.
2. A solicitor offering financial incentives or hospitality in return for preferential terms and/or preferential treatment.
3. A client offering an incentive to provide a more favourable report.
4. An expert could be deemed as influencing the business if they became a member of the MRO's management team.

Generally, if you are offered anything from an expert, client, solicitor, or any other party that seems unusual then this should be referred to the Managing Director.

3.3 Gifts and hospitality

Employees must not offer or give any gift or hospitality:

- which could be regarded as illegal or improper, or which violates the recipient's policies; or
- to any public employee or government officials or representatives, or politicians or political parties; or
- which exceeds **£50** in value for each individual gift or **£400** in value for each hospitality event (not to exceed a total value of **£2000** in any financial year), unless approved in writing by the Managing Director.

Employees may not accept any gift or hospitality from ML Doctors business partners if:

- it exceeds **£50** in value for each individual gift or **£400** in value for each hospitality event (not to exceed a total of **£2000** in any financial year), unless approved in writing by the Managing Director; or
- it is in cash; or
- there is any suggestion that a return favour will be expected or implied.

Where a Manager's approval is required above, if the Manager is below Director level then approval must be sought from an appropriate Director.

If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to the employee's Manager and donated to charity.

Within these parameters, local management may define specific guidelines and policies to reflect local professional and industry standards. Where this policy requires written approval to be given, the Managing Director shall put in place a process to maintain a register of all such approvals.

3.4 Facilitation payments and kickbacks

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to.

ML Doctors strict policy is that facilitation payments must not be paid.

3.5 Political Contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

3.6 Charitable contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the MD. All charitable contributions should be publicly disclosed and made to registered UK charities

4. Your responsibilities

You must ensure that you read, understand, and comply with this policy and that you have reviewed the information at <https://www.gov.uk/government/publications/bribery-act-2010-guidance>.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for ML Doctors or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the MD as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. ML Doctors reserve our right to terminate our contractual relationship with other workers if they breach this policy.

5. Record-keeping

ML Doctors must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with ML Doctors expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers, and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

6. How to raise a concern.

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with the MD.

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

It is important that you tell the MD as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

If these allegations are found to be in breach of the regulations within the Bribery Act 2010 then the MD must inform Medco and any other relevant party of this.

8. Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

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 bribery 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 your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the company's Grievance Procedure.

9. Training and communication

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis. All written records regarding conformance to this policy is to be maintained in each individual staff folders by the Managing Director.

ML Doctors' zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors, and business partners at the outset of business relationships with them and as appropriate thereafter.

10. Who is responsible for the policy?

The CEO has overall responsibility for ensuring this policy complies with ML Doctors legal and ethical obligations, and that all those under ML Doctors control comply with it.

The MD has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

11. Monitoring and review

The Compliance Officer will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy, and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Employees 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 MD.

This policy does not form part of any employee's contract of employment, and it may be amended at any time. This policy will be reviewed annually.



B Bishop

Managing Director

ML Doctors Ltd

MLD