

Freeway Medical Policy on Anti-Bribery & corruption

Renewed 2024–25

Commitment to Integrity & fairness

Freeway Medical - Chromis UK is committed to conducting business with integrity, transparency, and accountability. This Anti-Bribery Policy outlines our commitment to preventing bribery and corruption in all its forms within our operations and business dealings.



Policy Scope

This policy applies to all employees, officers, directors, contractors, consultants, agents, and any other third parties acting on behalf of Freeway Medical - Chromis UK. It covers all activities, regardless of location.

1. Policy Statement

Bribery and corruption are strictly prohibited. Freeway Medical - Chromis UK has a zero-tolerance approach to bribery and expects all employees and associated parties to comply with this policy and relevant anti-bribery laws, including the UK Bribery Act 2010.

2. Definitions

- **Bribery:** Offering, promising, giving, accepting, or soliciting something of value to influence an action or decision.
- **Corruption:** Abuse of entrusted power for private gain.
- **Facilitation Payments:** Small payments made to expedite routine government actions. These are prohibited under this policy.

3. Key Principles

- **Prohibition of Bribery:** Employees and associated parties must not offer, give, receive, or solicit bribes in any form.
- **Gifts and Hospitality:** Modest gifts and hospitality are permitted if they are reasonable, proportionate, and for legitimate business purposes, and must comply with the company gift guidelines available from HR. Lavish or frequent gifts are prohibited.
- **Facilitation Payments:** Prohibited in all circumstances.
- **Political Contributions:** No contributions are to be made to political parties or candidates on behalf of the organization.
- **Charitable Donations:** Must be legal and ethical under local laws and practices and must not be used as a subterfuge for bribery.

Responsibilities

- **Employees:** Must comply with this policy and report any suspected bribery or corruption.
- **Management:** Responsible for ensuring compliance with the policy and fostering a culture of integrity and transparency.
- **Anti-Bribery Compliance Officer:** Designated to oversee the implementation and monitoring of the anti-bribery program.

7. Risk Assessment

Regular risk assessments must be conducted to identify and evaluate the risks of bribery and corruption within the organization's operations. Appropriate measures must be taken to mitigate identified risks.

8. Due Diligence

Due diligence must be conducted on all third parties, including suppliers, contractors, and business partners, to ensure they comply with anti-bribery laws and this policy.

9. Training and Communication

- **Training:** Mandatory anti-bribery training for all employees and associated parties to ensure awareness and understanding of this policy.
- **Communication:** The policy must be communicated clearly to all employees and third parties, and made available on the company's internal network.

10. Reporting and Whistleblowing

- **Reporting:** Employees and third parties are encouraged to report any suspected bribery or corruption. Reports can be made confidentially to the Anti-Bribery Compliance Officer.
- **Whistleblowing Protection:** Whistleblowers will be protected from retaliation or adverse consequences when reporting in good faith.

11. Monitoring and Review

- **Monitoring:** Ongoing monitoring of compliance with this policy through audits and checks.
- **Review:** The policy must be reviewed annually and updated as necessary to ensure its effectiveness and compliance with evolving legal requirements.

12. Consequences of Non-Compliance

Non-compliance with this policy may result in disciplinary action, including termination of employment or contract, and potential legal action.

13. Contact Information

For any questions or concerns regarding this policy, or to report an incident, please contact the Anti-Bribery Compliance Officer at

ian.jones@freewaymedical.co.uk

01635 868 191.

This Anti-Bribery Policy has been approved by the management of Freeway Medical - Chromis UK. All employees and associates are required to acknowledge their understanding and compliance with this policy.

Signed on behalf of Freeway Medical / Freeway Med-tech - trading names of Chromis UK Ltd.



Date: 4th January 2024