

ANTI-BRIBERY POLICY

This policy document applies to your employment at Medicare Colgate Ltd, the "Organisation" However, this policy does not form part of your contract of employment.

For any policy to be effective it must be applied throughout the Organisation, this policy therefore applies to all staff regardless of position or seniority.

1. Policy Statement

1.1 This Organisation is committed to complying with the Bribery Act 2010 and all legislation that adds to or supersedes the Act.

1.2 The Organisation will provide practical advice and training to both new employees and existing employees operating in new territories to make them aware of the risks of bribery.

1.3 Where appropriate the Organisation will carry out risk assessments when entering into either a new geographical territory or new product market.

1.4 Furthermore the Organisation will undertake due diligence when entering into business with new third parties or engaging third parties to act upon behalf of the Organisation.

1.5 The Organisation will continually monitor its policies and practices to ensure that the Act is complied with. Every executive, manager and employee has a responsibility to follow and implement this policy.

2. Bribing a Person

Under the Act it is an offence to directly or indirectly offer, promise or give a financial advantage to another. Where the intention is to induce another person to perform a relevant function or activity improperly or reward such action, or where the acceptance of the bribe itself constitutes improper performance of a relevant function or activity.

3. Accepting a Bribe

It is an offence where a recipient or potential recipient of a bribe requests, agrees to receive or accepts a financial or other advantage with the intention that a relevant function will be performed improperly by them. Or that by agreeing to the above a relevant function is itself performed improperly. Or improper performance is rewarded. Or is improperly performed in anticipation of a bribe. It is irrelevant if the improper performance is carried out by the actual recipient of the bribe or another person.

4. Bribing a Foreign Public Official

It is an offence to offer, promise or give a financial or other advantage to a foreign public official, with the intention of influencing the official in the performance of their official duties. The person offering the bribe must also have the intention to obtain or retain business or obtain an advantage.

5. Failure to Prevent Bribery

The Organisation will be liable under the Act if a person associated with it bribes another party with the intention of obtaining or retaining business or gaining an advantage.

6. Reporting

All officers, managers and employees have a duty to report all suspicions of bribery, attempts at bribery and actual instances of bribery simultaneously to both their next-in-line in management and directly to the most senior managers or executives within the Organisation.

7. Duty to Act

Any officer, manager or employee that receives such information from either another officer, manager, employee or third party has a duty to ensure that the information received is acted upon and that the information received reaches the most senior managers or executives within the Organisation in a timely manner.

8. Senior Management and Organisation Liability

The Organisation will be liable under the Act if a senior person, such as a managing director, ceo, finance director, member of the board or other senior manager within the Organisation commits an offence under the Act. As the person is in a senior position the Organisation is held liable for their actions.

9. Clear Communication

The Organisation will clearly communicate its stance on bribery to all business partners, agents and any other third parties in order to both promote this policy and put such parties on notice that this policy will be complied with in full and without exception.

10. Date of Implementation

This policy is effective from 14/4/23 and shall not apply to any actions that occurred prior to this date.

11. Questions

If you have any questions regarding this policy document and how it applies to you please consult Alyson Baker.

12. Alteration of this Policy

This policy will be subject to review, revision, change, updating, alteration and replacement in order to introduce new policies from time to time to reflect the changing needs of the business and to comply with legislation. Any alterations will be communicated to you by Daniel Hall.