

ANTI-BRIBERY, ANTI-CORRUPTION, FRAUD & MALPRACTICE POLICY

K&H Medical Ltd believes that business success should depend on a fair and open assessment of the company's products and services rather than being partly or wholly reliant on bribes, or other inducements to those outside the company.

The Board is committed to ensuring a risk-based approach to assessing business risk and implementing processes, procedures and controls to monitor bribery and corruption risk and to ensure robust ethical management.

It is the company's policy to ensure that its business, senior management, and other staff comply with all legislation but no limited to the Bribery Act 2010 designed to combat bribery and corruption in the jurisdictions in which they operate.

The company's Managing Director is the designated person in regard to Anti-Bribery, Corruption, Fraud and Malpractice.

Scope of Policy

This policy applies to all employees of the company, agents, contractors, subcontractors, consultants, business partners and any other parties associated with K&H Medical. It is the responsibility of all concerned to ensure that bribery, corruption, fraud and malpractice are prevented, detected and reported. All reports should be made in accordance with the company's Whistleblowing Policy to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. The purpose of this policy is to ensure that effective and timely actions are taken and to increase the chances of a successful investigation and outcome.

Bribery & Corruption

Bribery is defined as the giving or promise of financial or other incentives to induce another person to perform particular functions improperly and to be rewarded for the improper conduct. Corruption is the misuse of an entrusted power for personal gain.

Consequences of Bribery & Corruption

- Failure to comply with this policy and/or the Bribery Act 2010 may result in disciplinary action, including dismissal, criminal penalties or imprisonment.
- A breach of this policy by any employee or business associate may result in K&H Medical being deemed to be in breach of the Bribery Act 2010, subjected to fines and suffering negative publicity or associated damage.

Fraud and Malpractice

Fraud and Malpractice comprises both the use of deception to obtain an unjust or illegal financial advantage and intentional misrepresentation affecting any aspects of the company's activities by one or more individuals among all staff or third parties. All staff within their area of responsibility should be alert for any indications or irregularities that might occur.

Plan and Action for Fraud & Malpractice

PLAN

The plan defines the levels, actions and reporting structure in the event of a suspected fraud or malpractice.

- Prevent further loss
- Establish and secure evidence necessary for criminal / disciplinary action
- Determine when and how to contact the Police and establish reporting structure for communication
- Assign responsibility for the investigation process
- Minimise and recover losses
- Review the reasons for the incident, the measures taken to prevent a recurrence and determine any action needed to respond to fraud and malpractice in the future
- Keep all relevant personnel suitably informed about the incident as the investigation develops
- Encourage an anti-fraud culture within the company by taking the stance that all cases of fraud or malpractice will be pursued vigorously taking the appropriate legal or disciplinary action where justified

ACTION

The action defines the process in the event of a suspected fraud or malpractice. Immediate notification to management if a staff member suspects that a fraud has occurred culminating in an initial verbal report, followed up by a written report within 24 hours and should cover the following:

- The amount / value if established
- The position regarding recovery or company exposure
- The period over which the irregularity occurred
- The date of discovery and the suspected fraud / malpractice was discovered
- The type of irregularity and what led to it i.e.
 - a) Was there a breakdown in the systems of internal control OR
 - b) Is there any inherent weakness in the system of internal control which allowed it to occur
- Whether the person responsible has been identified
- Whether any collusion with others is suspected
- Details of any actions taken to date
- Any other information or comments which might be useful

Gifts & Hospitality

- All gift or hospitality expenses must be transparent, proportionate, reasonable and authorised in advance.
- In the course of providing services to clients or suppliers employees should not accept money, gifts or other forms of reward without the initial authorisation of the Managing Director.
- If any employee is in doubt as to what constitutes a potential act of bribery, then contact the Managing Director.
- The value of all gifts or hospitality, given or received, should be proportionate to the matter to which they relate and should be neither unusually high nor too generous.

Anti-Competitive Practices – Detection & Avoidance

- Understand Competition Law in the UK and comply to avoid any serious consequences for the business and individuals
- Promote an Ethical Code of Practice culture within the company to increase the level of detection of anti-competitive behaviour
- Avoid Anti-Competitive agreements and practices
- Detect, monitor and access market power
- If anti-competitive law is breached, action must be taken immediately to stop it, seek independent legal advice.
- If anti-competitive practice is detected, come clean

Responsibilities for Compliance

- No party may give / promise financial or other advantages to another party on the company's behalf, where this is intended to induce the other party to perform a particular function improperly or constituting an improper conduct.
- No party may request or receive any financial or other advantages from another party where this is intended to induce the party to perform a particular function improperly or will constitute improper conduct or where the recipient intends to act improperly in anticipation of such an advantage.
- Parties must be aware and alert at all times.
- Exercise due diligence when dealing with third parties on behalf of the company.
- Report any related concerns to the Managing Director of the company or in accordance with the Whistleblowing Policy
- Confidentiality will be maintained during any investigation, that is practical and appropriate in the circumstances.

Due Diligence & Risks

The company relies on all employees to report any suspected bribery, corruption, fraud or malpractice and will receive the full support of the company even if following an investigation it is found that no actual case took place. The company reviews the effectiveness and implementation of this policy on an annual basis.




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Signed on behalf of K&H Medical Limited.

Name: Lewis Harvey

Position: Managing Director

Signature: 

Date of Review: 4th August 2024

Date of next review: 4th August 2025