



## **Anti-Bribery and Corruption Policy**

Xpede Medical Ltd operates a zero-tolerance policy with regard to bribery and corruption and all Directors/employees and officers of the organisation are bound by this policy.

### **1. Purpose**

- 1.1** This anti-bribery policy exists to set out the responsibilities of Xpede Medical Limited and those who work for us in regard to observing and upholding our zero-tolerance position on bribery and corruption.
- 1.2** It also exists to act as a source of information and guidance for those working for Xpede Medical Limited. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

### **2. Scope**

#### **2.1 Who is covered by the policy**

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

### **3. Definition of Bribery**

**3.1** Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

**3.2** A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.



**3.3** Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

#### **4. What is not acceptable**

##### **4.1 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.

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

- there is any suggestion that a return favour will be expected or implied.

##### **4.2 Facilitation Payments and Kickbacks**

Xpede Medical Limited does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

Xpede Medical Limited does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

#### **5. Employee Responsibility**

**5.1** All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

**5.2** If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Managing Director has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

#### **6. References, standards, policies and process**

Bribery Act 2010