

Anti-Bribery and Anti-Corruption Policy Document

This anti-bribery policy exists to set out the responsibilities of Doctors For You (DFY) and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption. It also exists to act as a source of information and guidance for those working for DFY. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

A. Policy Statement:

DFY is committed to conducting its operations and programmes in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. The organization has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in operations and relationships, wherever in the country we operate. DFY will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. DFY recognises that bribery and corruption are punishable under law. If our organization is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

B. Definition of ‘Bribery’

-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.

-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.

C. What constitutes a Bribery and what’s not?

This section of the policy refers to 3 key areas:

- Gifts and hospitality.
- Political contributions.
- Charitable contributions.

Gifts and Hospitality

DFY accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- a. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- b. It is not made with the suggestion that a return favour is expected.
- c. It is given in the name of the organization’, not in an individual’s name.
- d. It does not include cash or a cash equivalent (*e.g.* a voucher or gift certificate).
- e. It is appropriate for the circumstances (*e.g.* giving small gifts in festival or as a small thank you to a organization’ for helping with a large project upon completion).
- f. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.

- g. It is given/received openly, not secretly.
- h. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- i. It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the organization line-manager.
- j. Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the line manager, who will assess the circumstances.
- k. DFY recognises that the practice of giving and receiving gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.
- l. As good practice, gifts given and received should always be disclosed to the line-manager. Gifts from suppliers should always be disclosed.
- m. The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the line manager should be sought.

Political Contributions

DFY will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

Charitable Contributions

- a. DFY accepts (and indeed encourage) the act of donating to charities whether through services, knowledge, time or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.
- b. Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.
- c. We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the line-manager.

D. Employee Responsibilities

- This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties¹), or any of our subsidiaries or their employees, no matter where they are located . The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.
- 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.
- Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively, or through a third party (such as an agent or distributor). They must not bribe a

¹ In the context of this policy, third-party refers to any individual or organisation our organization' 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.

foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the organization's line-manager.

- Employees of DFY must ensure that they read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.
- 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.
- If an employee have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the line-manager.
- If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. The organization has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

E. Raising a Concern

This section of the policy covers 3 areas:

- a. Raising concern.
- b. Victim of bribery or corruption.
- c. Protection.

Raising Concern

- If an employee suspect that there is an instance of bribery or corrupt activities occurring in relation to DFY, they are encouraged to raise their concerns at as early a stage as possible. If they are uncertain about whether a certain action or behaviour can be considered bribery or corruption, they should speak to their line manager, the director, or the Head of Governance and Legal.
- DFY will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

Victim of bribery or corruption

Employee must tell their line-manager as soon as possible if they are offered a bribe by anyone, if they are asked to make one, if they suspect that they may be bribed or asked to make a bribe in the near future, or if they have reason to believe that you are a victim of another corrupt activity.

Protection

- If they refuse to accept or offer a bribe or they report a concern relating to potential act(s) of bribery or corruption, DFY understands that you may feel worried about potential repercussions. DFY will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken. DFY will ensure that no one suffers any detrimental treatment² as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or

² Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

corruption.

- If employee have reason to believe they have been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, they should inform their line manager immediately.

F. Training and Communication

- DFY will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked annually to formally accept that they will comply with this policy.
- DFY's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all donors, suppliers, contractors, business partners, and any third- parties at the outset of business relations, and as appropriate thereafter.
- DFY will provide relevant anti-bribery and corruption training to employees etc. where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced. As good practice, all businesses should provide their employees with anti- bribery training where there is a potential risk of facing bribery or corruption during work activities.

F. Record

DFY will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.

G. Monitoring

- DFY's line-manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.
- Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.
- Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the line manager.
- This policy does not form part of an employee's contract of employment and may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

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