



## POL04: ANTI- BRIBERY POLICY

Rev: 05

### **HENLEYS MEDICAL SUPPLIES LTD.**

Brownfields  
Welwyn Garden City  
Hertfordshire  
AL7 1AN

01707 385226

[www.henleysmed.com](http://www.henleysmed.com)

## 1. Policy Statement

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory, or personal advantage.

It is the policy of Henleys Medical Supplies to conduct all of our business in an honest and ethical manner. Henleys Medical Supplies takes a zero tolerance approach to bribery and corruption, and is committed to acting professionally, fairly, and with integrity in all of our business dealings and relationships wherever we operate, and implementing and enforcing effective systems to counter bribery.

Henleys Medical Supplies will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which the business operates. However, the business remains bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If Henleys Medical Supplies are found to have taken part in corruption, the business could face an unlimited fine, be excluded from tendering for public contracts, and face damage to reputation of the business.

Company policies are available electronically at all times to internal employees, and externally upon request.

## 2. Policy

### 2.1. Scope

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Henleys Medical Supplies business is conducted in a socially responsible manner.

In compliance with the Bribery Act 2010, no employee should directly or indirectly offer, promise, give, or demand a bribe or other undue advantage to obtain or retain business or gain other improper advantage.

All offers of bribes from third parties must be reported to Henleys Medical Supplies. An employee must not accept or agree to accept any offer of gifts or services from customers, suppliers, distributors, or any person having similar connections to Henleys Medical Supplies, without prior consent from a Director.

This policy covers all aspects of Henleys Medical Supplies, including employees at all levels and grades, and any persons associated with Henleys Medical Supplies.

This policy covers:

- Bribes
- Gifts, samples and hospitality
- Medical Conferences and congresses
- Training and Education
- Educational and Research Grants
- Consulting arrangements
- Political contributions
- Charitable contributions

A breach of this rule may give rise to disciplinary action, which may lead to dismissal without notice.

## 2.2. Types

### 2.2.1. Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, employees must not bribe a foreign public official anywhere in the world.

### 2.2.2. Gifts, samples, and hospitality

- Activities permitted:
- Minimal value branded promotional items
- Free products/samples for evaluation to be a reasonable value/quantity (Requests should be approved by the Sales and Marketing Director or the Managing Director)
- Meals or other modest hospitality in conjunction with a meeting when the meeting is directly related to performing a contract or the promotion, demonstration or explanation of HENLEYS MEDICAL SUPPLIES products. The meeting should occur close to the Health Care Professional's (HCP) or Government Official's (GO) place of business.

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
- To any public employee or government officials or representatives, or politicians or political parties
- No gifts may be given to customers such as tickets to sporting events, theatre, golf or other activity where HENLEYS MEDICAL SUPPLIES pays for the HCP's or GO's
- No gifts/products given to HCP or GO to obtain or keep business or to obtain some improper advantage except for genuine evaluations
- No gifts/products given as a 'Thank you' for the purchase of HENLEYS MEDICAL SUPPLIES products
- No gifts of cash or cash equivalents, such as gift certificates.

If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to HENLEYS MEDICAL SUPPLIES. The business appreciates that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

### 2.2.3. Medical conferences and congresses

Activities permitted:

- Event-level sponsorship of nationally and regionally recognised third-party conferences or congresses dedicated primarily to promoting objective scientific and educational activities and discourse
- Payment of reasonable educational grants to: (1) professional medical societies; (2) training institutions; or (3) healthcare institutions; for the registration, travel and lodging of attendees to such conferences or congresses (provided that the choice of candidates to attend such conferences or congresses resides exclusively with the society or institution)
- Hosting modest meals and receptions for conference/congress attendees if consistent with the sponsor's guidelines and subordinate in time and focus to the purpose of the conference/congress
- Purchase of advertisements and booth space for HENLEYS MEDICAL SUPPLIES displays at fair market value at conferences/congresses.

Activities NOT permitted:

- Any financial sponsorship involving the direct payment or reimbursement of a HCP's expenses to attend third-party conferences or congresses
- Any financial support for the spouse or guest of a HCP that does not have a bona fide interest in the subject of the meeting or event
- Any educational grant or other financial support that is contrary to the regulations of the country where the HCP is licensed to practice
- Educational grants given to any HCP or Government Official in order to obtain or keep business or to obtain some improper advantage
- Side trips, sight-seeing, or stop-overs
- Per diem payments.

2.2.4. Training and educational grants

Permitted activity (if permission granted by the Sales and Marketing Director or Managing Director):

- Provision of company-sponsored training on the safe and effective use of HENLEYS MEDICAL SUPPLIES' products conducted in clinical, conference, hotel or other setting conducive to the effective transmission of knowledge
- Payment of reasonable travel and hospitality in the form of meals and receptions in connection with these programs provided it is subordinate in time and focus to the educational/training purpose. The expense limits noted above apply
- The need for any training or educational program must be adequately documented
- The support must comply with the regulations of the country where the HCP is licensed to practice.

Activity NOT permitted:

- Any financial support to the spouse or guest of a HCP that does not have a bona fide interest in the subject of the meeting or event
- Any payment, including travel and hospitality that is contrary to the regulations of the country where the HCP is licensed to practice
- Company training given to any HCP or Government Official in order to obtain or keep business or to obtain some improper advantage
- Side trips, sight-seeing or stop-overs
- Per diem payments.

2.2.5. Educational and research grants

Permitted activity (if permission granted by the sales and Marketing Director or Managing Director):

- Only grants intended to support bona fide educational or research programs are permitted. Clinical research grant applications must be approved by the Sales and Marketing Director or Managing Director.

Activity NOT permitted when considering Educational and Research Grants:

- Any educational grant or other financial support that is contrary to the regulations of the country where the HCP is licensed to practice
- Grants given to any HCP, Government Official or institution in order to obtain or keep business or to obtain some improper advantage.

#### 2.2.6. Consulting arrangements

- Activity permitted (if permission granted by the Sales and Marketing Director or Managing Director):
- Compensation of individuals, including physicians or other customers, for bona fide consulting and personal services where the services have value to HENLEYS MEDICAL SUPPLIES and the fees are based on services actually provided
- All consulting arrangements must be in writing and consistent with the regulations of the country where the HCP is licensed to practice or customer resides
- HENLEYS MEDICAL SUPPLIES must make the payment and it must be made with a company cheque or by wire transfer
- Payment for the consultant's travel and related expenses should be made directly to the third-party vendor whenever practical
- All payments must be recorded properly.

#### Activity NOT permitted:

- A consulting arrangement that is not documented with a written consulting agreement
- Any consulting arrangement that is contrary to the regulations of the country where the HCP is licensed to practice
- Consulting agreement entered into with any HCP or Government Official in order to obtain or keep business or to obtain some improper advantage
- A consulting agreement that is for vague or unspecified services.

#### 2.2.7. Political contributions

Henleys Medical Supplies does not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

#### 2.2.8. Charitable contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices.

Charitable donations are permitted only if the donation is intended for a charitable or other philanthropic purpose and has the approval of the Sales and Marketing Director or the Managing Director. Charitable donations given to any HCP, Government Official or institution in order to obtain or keep business or to obtain some improper advantage, are not permitted.

No donation must be offered or made without the prior approval of the Sales and Marketing Director or the Managing Director. All charitable contributions should be publicly disclosed.

### 2.3. Responsibilities

#### 2.3.1. Directors/Senior Management/Managers

The board of directors has overall responsibility for ensuring this policy complies with legal and ethical obligations, and that all those under our control comply with it.

The Sales and Marketing Director has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness, and dealing with any queries on its interpretation.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

#### 2.3.2. All Employees

All employees of HENLEYS MEDICAL SUPPLIES must read, understand, and comply with this policy. The prevention, detection, and reporting of bribery and other forms of corruption are the responsibility of all those working for the business or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

The employee must notify their manager, the Sales and Marketing Director, or the Managing Director as soon as possible if they believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. HENLEYS MEDICAL SUPPLIES reserve the right to terminate our contractual relationship with others if they breach this policy.

#### 2.4. Decision Guide

##### 2.4.1. Transparency

Interaction with HCP must be transparent and comply with national laws. Hence notification of any interaction should be made to hospital management or local bodies.

##### 2.4.2. Equivalence

Where a HCP is engaged to perform a service, the remuneration must be commensurate with, and represent a fair market value, for the services rendered.

##### 2.4.3. Separation

Interaction with HCPs MUST NOT be misused to influence purchasing decisions, nor should such interaction be contingent upon sales transactions or use or recommendation of HENLEYS MEDICAL SUPPLIES' products.

##### 2.4.4. Documentation

There must be a written agreement or documentation supporting any interaction with HCPs.

#### 2.5. Record Keeping

HENLEYS MEDICAL SUPPLIES must keep financial records and have appropriate internal controls in place that will evidence the business reason for making payments to third parties.

All employees must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

All employees must ensure all expenses claims relating to hospitality, gifts, or expenses incurred to third parties are submitted in accordance with this policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

#### 2.6. Raising A Concern

All employees of HENLEYS MEDICAL SUPPLIES are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If an employee is unsure whether a particular

act constitutes bribery or corruption, or if they have any other queries or concerns, these should be raised with the Sales and Marketing Director or the Managing Director.

#### 2.6.1. What to do if you are a victim of bribery or corruption

It is important that an employee informs the Sales and Marketing Director or the Managing Director as soon as possible if they have been offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

#### 2.7. Protection

Employees of HENLEYS MEDICAL SUPPLIES who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. HENLEYS MEDICAL SUPPLIES aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

HENLEYS MEDICAL SUPPLIES are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

If an employee believes that they have suffered any such treatment, they should inform the Sales and Marketing Director or the Managing Director immediately. If the matter is not remedied, it be raised formally using the company's Grievance Procedure.

#### 2.8. Training & Communication

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis.

Our zero tolerance approach to bribery and corruption must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them, and as appropriate thereafter.

### 3. Review

This policy shall be maintained and reviewed by the Managing Director.



Danielle Henley, Managing Director

#### 4. Revision History

Revision	Modified by	Date	Description of Change
01	Andy Cleveland	April 2015	Initial issue.
02	Andy Cleveland	April 2016	Annual review. Mobile numbers updated.
03	Vikki Patis	April 2017	Annual review.
04	Vikki Patis	April 2018	Annual review. New format.
05	Vikki Patis	December 2020	New format.