

# Anti-Bribery Policy

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## Introduction

Anatomical Concepts UK Ltd (the Company) is committed to conducting its business with the highest level of integrity and ethical standards. This Anti-Bribery and Corruption Policy outlines the principles and guidelines that all employees, officers, directors, agents, consultants, contractors, and business partners of Anatomical Concepts UK (collectively referred to as "Personnel") must adhere to in order to prevent bribery and corruption in any form.

The Company prohibits the offering, giving, proposing or the acceptance of any bribe or corrupt incentive, whether in cash or in any other form:

- To or from any person or company including a public official, public body, private person or company.
- By any individual or other person or body acting on the Company's behalf.
- In order to gain any commercial, contractual, or regulatory advantage for the Company in any way which is unethical.
- To gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

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## Scope

This Policy applies to all activities and operations of Anatomical Concepts UK Ltd, regardless of the geographical location, and covers all Personnel involved in the company's business activities. It applies to all interactions with customers, suppliers, business partners, government officials, and any other external parties.

The Company takes any relevant wrongdoing seriously and would encourage anyone with knowledge of wrongdoing not to remain silent. The policy aims to provide guidance to:

- Help Personnel identify prohibited actions.
- Provide information on how to disclose such actions.

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## Definition and prohibition of Bribery and Corruption

Bribery is a specific offence which concerns the practice of offering and/or receiving something, usually money, to gain an illicit advantage. A recipient does not need to benefit personally from a bribe - it may be that the intended receiver is a third party or a company.

Anatomical Concepts UK Ltd strictly prohibits any form of bribery, corruption, or unethical conduct, including but not limited to:

- a) Offering, promising, giving, or accepting bribes, kickbacks, or any other improper payments or benefits to or from any person or entity, whether directly or indirectly.
- b) Facilitating or participating in any activity that violates applicable anti-bribery and anti-corruption laws, including the UK Bribery Act 2010 and any other relevant local laws.
- c) Engaging in any action that would improperly influence a business decision, gain an unfair advantage, or obtain or retain business improperly.

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## Compliance with Laws and Regulations

Anatomical Concepts UK Ltd is committed to complying with all applicable laws and regulations related to anti-bribery and anti-corruption. Personnel must familiarise themselves with and strictly adhere to these laws, including the UK Bribery Act 2010 and any other relevant local legislation.

Any breach of these laws will not be tolerated and may result in disciplinary action, including termination of employment or business relationship.

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## Unacceptable Actions

Below are some of the areas within which unacceptable actions can occur and can be deemed as bribery:

**Excessive gifts** such as entertainment and hospitality when used to apply improper influence on decision makers.

- a) Personnel must not offer, give, receive, or solicit gifts, hospitality, or any other form of benefits that could be perceived as an attempt to improperly influence business decisions or gain unfair advantages.
- b) Reasonable and proportionate business-related gifts, hospitality, or expenses may be accepted or offered, provided they are consistent with local customs, lawful, and not intended to influence business decisions.
- c) All gifts, hospitality, or expenses must be accurately recorded in accordance with the company's policies and procedures.

**Third parties** should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Appropriate due diligence should be undertaken. Any payments to third parties should be properly authorised and recorded.

**Reciprocal agreements** or any other form of 'quid pro quo' are never acceptable unless they are legitimate business arrangements which are properly documented and approved by your Director / Finance Director.

**Kickbacks** arise when suppliers or service providers pay part of their fees to the individuals who give them the contract or some other business advantage.

**Record keeping** can be exploited to conceal bribes or corrupt practices. Records should not be destroyed or concealed; all records must be accurate and transparent and kept in line with document retention guidelines.

**Facilitation payment** is an unofficial payment made in return for services which the payer is legally entitled to receive without any payment; and are generally used to secure or hurry up an action. In addition, a facilitation payment may also be a financial payment that may constitute a bribe and is made with the intention of expediting an administrative process.

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## Due Diligence on Business Partners

Anatomical Concepts UK will exercise due diligence in selecting and engaging business partners, including suppliers, distributors, agents, consultants, and contractors. Prior to entering into any business relationship, Personnel must conduct appropriate risk assessments and ensure that the prospective partners have a strong commitment to anti-bribery and anti-corruption principles.

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## Reporting Violations

- a) Personnel have a responsibility to promptly report any actual or suspected violations of this Policy in the first instance to their immediate supervisor. If an individual does not feel comfortable raising a matter with their supervisor - due to the nature of the concern, its seriousness, or for some other reason - they can raise it immediately with a Company Director.

- b) Personnel are protected from victimisation, harassment or disciplinary action as a result of any disclosure, where the disclosure is made in good faith and is not made maliciously or for personal gain.
- c) The company will investigate all reported violations thoroughly, take appropriate corrective action, and, if necessary, report the matter to the appropriate authorities.

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## Training and Awareness

Anatomical Concepts UK will provide regular training and awareness programs to all Personnel to ensure they understand their obligations under this Policy, applicable laws, and the consequences of non-compliance. Training programs will be periodically reviewed and updated to address new risks and changes in legislation.

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## Non Compliance

Any violation of this Policy will be subject to appropriate disciplinary action, which may include counselling, warnings, suspension, termination of employment or business relationship, and legal action. The severity of the disciplinary action will depend on the nature and severity of the violation.

Failure to comply with this policy and anti-bribery / corruption legislation can result in:

### Organisational consequences

- Serious reputational damage.
- The unenforceability of contracts entered into as a result of acts of bribery.
- Criminal or civil liabilities for the company including unlimited fines and imprisonment.

Any breach matter of this policy by third parties, agents, contractors and others will be treated as a serious matter and dealt with in accordance with the relevant contract and in accordance with statutory obligations.

### Personnel consequences

- Disciplinary action initiated by the company, up to and including dismissal.
- Personal reputational damage.
- Personal criminal liability followed by fines or imprisonment.

Any breach of this policy will be treated in accordance with statutory obligations and in accordance with the Company's Disciplinary Policy.

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## Policy Review

This Policy shall be reviewed and updated as required every three years or following any changes in legislation or regulations.

Any necessary revisions or updates will be made to address emerging risks and changing circumstances, to ensure its effectiveness and compliance with applicable laws and best practices.

<b>Date of this Revision</b>	November 2021
<b>Date of Next Review</b>	November 2024