



## **Anti-Bribery / Corruption Policy**

### **Introduction:**

Bartra Healthcare is committed to conducting its business operations with integrity, transparency, and in full compliance with all applicable laws and regulations, including anti-bribery and anti-corruption laws. This policy outlines our commitment to preventing bribery and corruption and provides guidance to all employees, contractors, and business partners on their responsibilities in upholding these principles.

### **Scope:**

This policy applies to all individuals working for or on behalf of Bartra Healthcare including but not limited to employees, directors, officers, contractors, consultants, agents, and other third parties engaged in business activities with or on behalf of the company.

### **Prohibited Conduct:**

#### **Bribery:**

Bribery in any form is strictly prohibited. Bribery refers to the offering, giving, receiving, or soliciting of anything of value, directly or indirectly, with the intent to influence the actions or decisions of an individual in a position of trust, and to obtain or retain business or an improper advantage.

#### **Facilitation Payments:**

Facilitation payments, which are small payments made to expedite routine administrative processes, are also prohibited and are considered a form of bribery.

#### **Extortion and Kickbacks:**

Extortion, the act of obtaining something through coercion or threats, and kickbacks, the receipt of improper payments or benefits in return for business favours, are strictly prohibited.

#### **Improper Gifts and Hospitality:**

Gifts, hospitality, or entertainment should never be offered, given, or accepted if they could reasonably be perceived as intended to influence a business decision or create an obligation. The value of gifts and hospitality should be appropriate, proportionate, and compliant with applicable laws and regulations.

## **Responsibilities:**

1. **Management Commitment:**  
Senior management is responsible for promoting a culture of integrity, ensuring the implementation of effective anti-bribery and anti-corruption measures, and leading by example.
2. **Employees:**  
All employees have a responsibility to familiarise themselves with this policy, act in accordance with its principles, and report any concerns or suspected violations to the appropriate channels.
3. **Contractors and Business Partners:**  
Contractors, consultants, agents, and other business partners engaged by Bartra Healthcare are expected to adhere to the principles outlined in this policy and to have their own anti-bribery and anti-corruption policies in place.
4. **Reporting and Whistleblowing:**  
Employees and others are encouraged to report any suspected violations of this policy promptly. Bartra Healthcare will ensure that all reports are treated confidentially and investigated appropriately. Protection will be provided to individuals making good faith reports, and no retaliation will be tolerated.
5. **Compliance and Training:**  
Bartra Healthcare is committed to providing adequate training and resources to ensure that employees and relevant parties understand and comply with this policy. Regular reviews and updates will be conducted to ensure ongoing compliance with changing laws and regulations.
6. **Consequences of Violations:**  
Violations of this policy will not be tolerated and may result in disciplinary action, up to and including termination of employment or contract, and legal action if appropriate.

## **Conclusion:**

By adhering to this anti-bribery and corruption policy, we demonstrate our commitment to conducting business with integrity, fairness, and respect for all stakeholders. It is the responsibility of each individual associated with Bartra Healthcare to uphold these principles and to foster a culture of transparency and ethical behaviour.

This policy is not exhaustive - employees, contractors, and business partners are encouraged to seek further guidance from the appropriate channels if they encounter situations that are not addressed directly in this policy.

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Chief Executive Officer

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Date