


Policy Title:	Anti-Bribery- Fraud -and- Corruption Policy		
Policy Code:	AHI_HR_SOP_52	Revision No:	
Issued On:	August 2017	Revision Date:	
Policy Owner:	Head-Human Resources	Department:	

1. INTRODUCTION

Policy Statement:

Artemis Medicare Services Limited (herein referred to as "Organization", "Artemis Hospitals" or "Artemis") is committed to maintain honesty and integrity in all its activities. It is also committed to the prevention of fraud, bribery and corruption within the organization and to the rigorous investigation of any such allegations.

1.1 General

1.1.1 Artemis Hospital wholly endorses this policy towards the elimination of any fraud within the organization and will seek to apply appropriate criminal, disciplinary, regulatory and civil sanctions against fraudsters and where possible will attempt to recover any identified losses.

1.1.2. Artemis wishes to encourage anyone that has reasonable suspicions of fraud to report them. All employees and retainers can be confident that they will not suffer in any way because of reporting reasonably held suspicions of fraud. For these purposes "reasonably held suspicions" shall mean any suspicions other than those which are raised maliciously and found to be groundless.

1.2 Aims and objectives

1.2.1 This anti-fraud, bribery and corruption policy is intended to ensure that employees and retainers are aware of the correct reporting requirements and of the actions the organisation will take to counter fraud, bribery and corruption. The policy is also intended to ensure that fraud, bribery and corruption is recognised and reported by employees and retainers who are aware of their responsibility to safeguard Artemis funds.

1.2.2 The purpose of this policy is to:


- a) Set our responsibilities to comply with laws against bribery and corruption and
- b) Provide guidance on how to recognize and deal with bribery and corruption issues.


1.3 Scope

This policy is applicable to all individuals working for Artemis Hospitals or any of its subsidiaries and affiliates anywhere in the world and at all levels and grades. In addition, Artemis managers are required to enforce the policy and ensure that people and entities for which they are responsible understand and adhere to this policy.

This includes directors, employees (whether regular, fixed-term or temporary) and retainers, associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as "associates" in this policy).

In this policy, **third- party** means any individual or organization that an associate may come in meet, during his/her engagement with the organization and includes actual and potential clients, customers, suppliers, vendors, distributors, business contacts, agents, business associates, government and public bodies including their advisors, representatives and officials, politicians and political parties.

 Group Team Leader – Human Resources Originator	 Head Human Resources Checked By	 CEO & ED Approved By
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2. DEFINITIONS

2.1 Bribery is

- a) **Offence of being bribed:** Bribery is the offer, promise or receipt of any gift, hospitality, loan, fee, reward or other advantage to induce or reward behavior which is dishonest, illegal or a breach of trust, duty, good faith or impartiality in the performance of a person's functions or activities (including but not limited to, a person's public functions, activities in their employment or otherwise relating to a business); or
- b) **Offence of bribing another person:** Bribery is the offer or promise of any gift, hospitality, loan, fee, reward or other advantage to a public official with the intention of influencing the public official in the performance of their public function, to obtain a business advantage.

Bribery includes not only direct payments, but also authorizing or permitting an associate or third party to commit any of the acts or take any part in the actions identified in (a) and (b) above.

2.2 Fraud is

2.2.1 Fraud is defined as: A dishonest act (or a failure to act) made with the intention of making a financial gain or causing a monetary loss (or risk of loss).

2.2.2 The dishonest act does not need to be successful for fraud to be committed, as long as the intention exists. Neither does the financial gain needs to be personal, but can be for the benefit of another. Where the intent is to cause a loss to the organisation, no gain by the perpetrator needs to be shown.

2.2.3 Petty theft, without the distortion of financial statements or other records, will normally be dealt with by the Security and reported to the Police. However, where an employee abuses their position to misappropriate cash or other income this may be considered as fraud and dealt with under this policy.


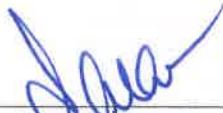

2.3 Corruption is


2.3.1 A form of dishonest or unethical conduct by a person entrusted with a position of authority, often to acquire personal benefit. It may include many activities including bribery and embezzlement, though it may also involve practices that are legal in many countries.

3. WHAT IS NOT ACCEPTABLE

It is not acceptable for any employee of Artemis Hospitals (or someone on his / her behalf) to:

- a. Accept an offer of a gift of any size from any Third Party which is in negotiation with, or is submitting a proposal with Artemis Hospitals.
- b. Give, promise to give or offer, any payment, gift, hospitality or advantage with the expectation or hope that a business advantage will be given or received or to reward a business advantage already given.
- c. Give, promise to give or offer, any payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.

		
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- d. Accept or solicit any payment, advantage, gift or hospitality from a Third Party that you know or suspect is being offered with the expectation that it will obtain a business advantage for them.
- e. Threaten or retaliate against, another employee who has refused to commit a bribery offence or who has raised concerns under this policy.
- f. Engage in any activity that might lead to a breach of this policy.
- g. The points stated above are illustrative in nature and in no way, intend to limit the applicability of this policy.

4. GIFTS AND HOSPITALITY

This policy does not prohibit normal business hospitality, appropriate gifts, entertainment and promotional or other similar business expenditure, such as calendars, diaries, pens, meals and invitations to theatre and sporting events (given and received), to or from Third Parties, if it is reasonable, appropriate, modest and bonafide corporate hospitality and if its purpose is to improve our organizational image, present our services or establish cordial relations.

However, the key determining factor for appropriateness of the gift or hospitality and/or its value would be based on facts and circumstances under which such gift or hospitality is provided.

The practice of giving gifts and hospitality is recognized as an established and important part of doing business. Nevertheless, it is prohibited when they are used as bribes.

Gifts and hospitality varies between countries and sectors and what may be normal and acceptable in one country may not be so in another. In some cultures, it may be an insult to reject a gift and refusals may adversely affect business relationships. In these circumstances and if the gift is anything other than moderate, the gift should be reported to the reporting manager who will decide whether such gift will be retained or returned.

To avoid committing a bribery offence, the gift or hospitality must be:

- a. Reasonable and justifiable in all the circumstances
- b. Intended to improve the image of Artemis, better present its services or establish cordial relations.

5. WILLFUL BLINDNESS

If an employee willfully ignores or turns a blind eye to any evidence of corruption or bribery within his / her department and/or around him / her, it will also be taken against the employee. Although such conduct may be "passive", i.e. the employee may not have directly participated in or may not have directly benefited from the corruption or bribery concerned, the willful blindness to the same can, depending upon the circumstances, carry the same disciplinary action as an intentional act.

6. RAISING A CONCERN OR COMPLAINT

Associates are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether an act constitutes bribery or corruption, you should raise the matter with your **reporting manager or consult an appropriate member of the Human Resource (HR) team**. Concerns should be reported by following the procedure set out in the Whistleblower Policy - <http://www.artemishospitals.com/corporate-info>

		
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