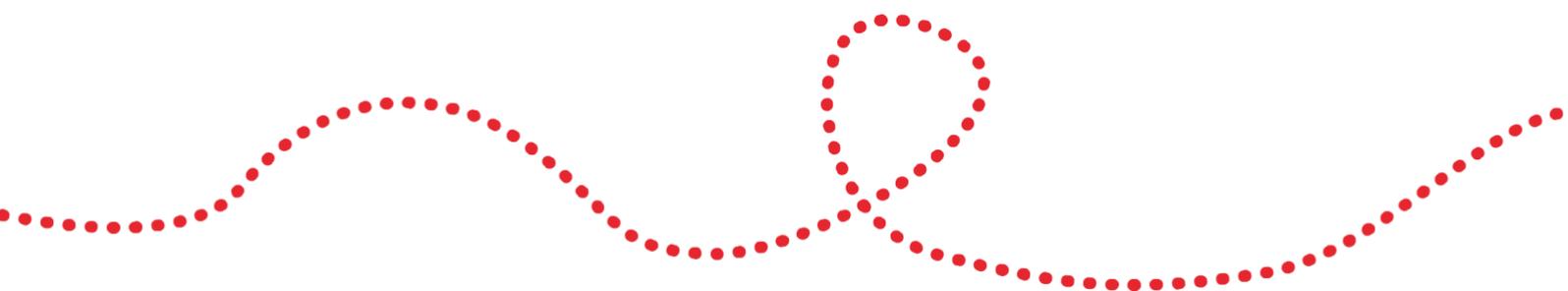




ANTI-CORRUPTION AND BRIBERY POLICY

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Approved by	Iain Murray
Author	Lynn Irwin
RENEWAL DATE	February 2023



PURPOSE

It is the policy of the Heartbeat Alliance to conduct business in an honest and ethical manner. As part of that, we are committed to a zero-tolerance approach to bribery and corruption and we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate and implement and enforce effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we conduct business, in the UK, including the Bribery Act 2010, which applies to conduct both in the UK and abroad (although we only operate within the UK).

POLICY/PROCEDURE

Scope and applicability

This policy applies to all individuals working for or on behalf of Heartbeat Alliance at all levels and grades, whether permanent, sub-contracted, agency, fixed-term or temporary and wherever located.

In this policy, third party means any individual or organisation that workers come into contact with during the course of work for Heartbeat Alliance and includes actual and potential commissioners, providers, suppliers, patients, agents, advisers, government or public bodies (including their advisers, representatives and officials), politicians and political parties.

What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to improperly gain any commercial, contractual, regulatory or personal advantage, which may constitute an offence under the Act, namely:

- Giving or offering a bribe;
- Receiving or requesting a bribe;
- Bribing a public official.

Heartbeat Alliance may also be liable under the Act if it fails to prevent bribery by an associated person (including but not limited to workers) for the benefit of the organisation.

Gifts and hospitality

This policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from third parties unless otherwise specifically stated. Any gift or hospitality:

- Must not be made with the intention of improperly influencing a Third Party or Worker to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;



- Must comply with local law in all relevant countries;
- Must be given in the name of the organisation, not in an individual's name;
- Must not include cash or cash equivalent;
- must be appropriate in the circumstances;
- must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift;
- must be given openly, not secretly; and

The intention behind the gift should always be considered fully.

What is not acceptable?

It is not acceptable for any Worker (or someone on their behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that they or Heartbeat Alliance will improperly be given a business advantage, or as a reward for a business advantage already improperly given;
- accept payment from a Third Party where it is known or suspected that it is offered or given with the expectation that the Third Party will improperly obtain a business advantage
- accept a gift or hospitality from a Third Party where it is known or suspected that it is offered or given with the expectation that the Third Party will improperly obtain a business advantage
- threaten or retaliate against another Worker who has refused to commit a bribery offence or who has raised concerns under this policy
- engage in any activity that might lead to a breach of this policy

Facilitation payments and 'kickbacks'

We do not make and will not accept facilitation payments or kickbacks of any kind, such as small unofficial payments in return for a business favour or advantage.

Charitable donations and sponsorship

Heartbeat Alliance only makes charitable donations and provides sponsorship that are legal and ethical under local laws and practices.

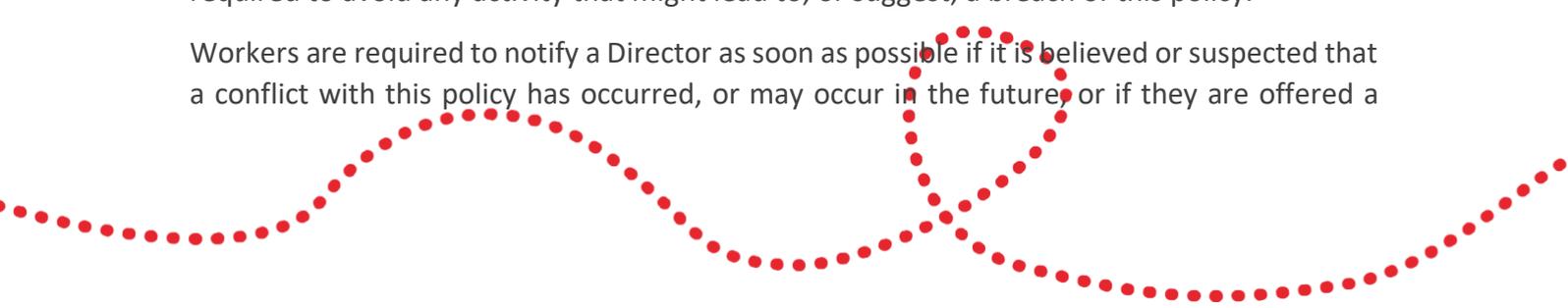
Record keeping

Heartbeat Alliance keep appropriate financial records and have appropriate controls in place which evidence the business reason for all payments and receipts.

Responsibilities and raising concerns

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all this working for us or working within our services. All Workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Workers are required to notify a Director as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, or if they are offered a



bribe, are asked to make one, suspect that this may happen in the future or believe that that they are a victim of another form or unlawful activity.

Any employee who breaches this policy may face disciplinary action which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with non-employee Workers if they breach this policy.

If any Third Party is aware of any activity by any Worker which might lead to, or suggest, a breach of this policy, they should raise their concerns with a Director.

Monitoring and review

Heartbeat Alliance monitors the effectiveness and reviews the implementation of this policy at appropriate intervals, considering its suitability, adequacy and effectiveness. Any improvements identified are made as soon as possible.

All Workers are aware that they are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

