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# **Anti-Bribery Policy**

## **Section 1 - Definitions:**

- In this document, "I," "we," "our," and "us" refer to Dr Farhan Munawar and the practice, collectively known as DME.
- "You," "your," and "their" refer to the instructing party, injured party, or claimant.

## **Section 2 - Introduction**

At Dr Farhan Munawar's practice, we are committed to conducting our business with honesty, integrity, and transparency. We adhere to the highest standards of ethical conduct and comply with all applicable laws and regulations, including those pertaining to anti-bribery and corruption.

## **Section 3 - Policy Statement:**

We agree that we will not offer, promise, give, request, agree to receive, or accept any bribes in the course of our professional practice, including when acting as an independent medical expert. Bribery is defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

## **Section 4 - Definition of Bribery**

Bribery is the offering, giving, receiving, or soliciting of anything of value to influence the actions or decisions of an individual or organisation to gain a business advantage. This includes, but is not limited to:

- Offering or accepting cash, gifts, hospitality, or favours to secure a business advantage.
- Providing an extra benefit to a decision-maker to influence their decision improperly.
- Rewarding someone for acting improperly.

## **Section 5 - Scope**

This policy applies to all staff, contractors, and representatives working with DME. Compliance with this policy is mandatory, and all individuals must ensure they understand and adhere to its principles.

## **Section 6 - Responsibilities, Reporting and Compliance**

The DME is responsible for:

- Familiarising themselves with the requirements of this policy and ensuring compliance with its provisions.
- Reporting any suspected or actual instances of bribery or corruption promptly to the DME.
- Cooperating fully with any internal or external investigations into allegations of bribery or corruption.

## **Section 7 - Reporting Bribery Concerns**

In the event that any bribery or corruption concerns are identified, I am committed to reporting these incidents not only internally but also to relevant external bodies, including MedCo. Any suspected or actual instance of bribery or corruption must be reported promptly to MedCo in accordance with MedCo guidelines, ensuring that appropriate actions are taken.

Any employee, contractor, or party working with the DME who suspects or identifies an instance of bribery or corruption should report the matter directly to me, either verbally or in writing, as soon as possible. Additionally, any concerns should be reported to MedCo following the established guidelines to ensure transparency and adherence to regulatory requirements.

## **Section 8 - Record-Keeping:**

All financial records and other relevant documentation must be kept accurately and transparently. Any irregularities or suspicious transactions must be reported to the compliance officer.

## **Section 9 - Training and Awareness**

I regularly participate in the training and awareness programs to ensure understanding of my responsibilities and obligations regarding bribery and corruption prevention. The training cover topics such as recognising bribery risks, reporting procedures, and ethical decision-making.

## **Section 10 - Consequences of Non-Compliance**

Violation of this policy may result in breach of my trust and agreement with the instructing parties and/or legal action, as well as civil or criminal penalties for individuals involved in bribery or corruption. The DME will fully cooperate with law enforcement authorities in investigating and prosecuting instances of bribery or corruption.

### **Section 11 - Review and Revision**

This policy will be reviewed periodically and updated as necessary to reflect changes in laws, regulations, and business practices. Amendments to the policy will be communicated where required, and appropriate training will be obtained.

### **Section 12 - Confirmation of Compliance:**

I, Dr Farhan Munawar, confirm that I have not breached this policy in the last 12 months and am committed to upholding its principles in all professional activities.

I am committed to complying with all applicable anti-bribery laws and regulations, including but not limited to the Bribery Act 2010 and any local laws or regulations governing anti-bribery and corruption.

### **Section 13 - Review and Monitoring:**

This policy will be reviewed annually to ensure its effectiveness and relevance. Any changes or updates will be communicated to all staff and representatives.

### **Section 14 - Conclusion**

By adhering to the principles outlined in this Anti-Bribery Policy, the DME demonstrate commitment to conducting business with honesty, integrity, and respect for ethical standards. This contributes to a culture of transparency, trust, and accountability within our business operations.