

# Viamed Group of Companies

## Anti-Bribery, Fraud and Corruption Policy

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### 1. Policy Statement

#### 1.1

Viamed Group of Companies is committed to conducting all business activities in an ethical, honest, transparent and professional manner. The company operates a zero-tolerance approach to bribery, fraud, corruption and other forms of economic crime.

#### 1.2

This policy sets out the responsibilities of Viamed Group of Companies and all persons working for or on behalf of the company in relation to preventing, detecting and reporting bribery, fraud, corruption and dishonest activity.

#### 1.3

Viamed Group of Companies is committed to implementing and maintaining effective systems, procedures and internal controls designed to prevent bribery, fraud, corruption, false accounting, financial misconduct and other unlawful activities.

#### 1.4

The company will comply with all applicable laws and regulations relating to anti-bribery, fraud prevention and economic crime, including but not limited to:

- The Bribery Act 2010
- The Fraud Act 2006
- The Economic Crime and Corporate Transparency Act 2023 (ECCTA)
- Applicable NHS anti-fraud requirements
- Relevant data protection and financial reporting legislation

#### 1.5

Viamed Group of Companies recognises that bribery, fraud and corruption can result in:

- Criminal prosecution
- Unlimited financial penalties
- Exclusion from public procurement and NHS contracts
- Reputational damage
- Loss of customer confidence
- Regulatory enforcement action

The company therefore takes its legal and ethical responsibilities seriously.

## 1.6

This policy applies to all employees, directors, managers, contractors, consultants, temporary staff, agency workers, third parties, suppliers, intermediaries and any person acting on behalf of Viamed Group of Companies.

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## 2. Commitment to Fraud Prevention

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### 2.1

Viamed Group of Companies is committed to maintaining reasonable and proportionate fraud prevention procedures in accordance with the Economic Crime and Corporate Transparency Act 2023.

### 2.2

The company will:

- Assess fraud and corruption risks within its operations
- Maintain appropriate financial and operational controls
- Monitor high-risk business activities
- Promote an open reporting culture
- Investigate concerns appropriately
- Provide relevant training and awareness
- Maintain accurate records and audit trails
- Review and improve procedures where necessary

### 2.3

Fraud prevention controls may include, but are not limited to:

- Separation of duties
  - Approval and authorisation controls
  - Purchase order verification
  - Supplier review processes
  - Invoice and payment validation
  - Stock and asset controls
  - Audit and management review activities
  - Access controls to systems and data
  - Monitoring of unusual transactions or activities
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## 3. Definitions

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### 3.1 Bribery

Bribery occurs when a person offers, gives, requests or accepts a financial or other advantage with the intention of improperly influencing a business decision or gaining an unfair advantage.

## 3.2 Fraud

Fraud includes any dishonest act intended to secure financial gain, operational advantage or cause loss to another party. This includes false representation, abuse of position, false accounting, invoice fraud, procurement fraud, cyber-enabled fraud and concealment of information.

## 3.3 Corruption

Corruption is the misuse of entrusted power or position for private gain or improper advantage.

## 3.4 Facilitation Payments

Facilitation payments are unofficial payments made to secure or speed up routine actions by officials or organisations. Such payments are prohibited.

## 3.5 Third Party

Any supplier, contractor, consultant, customer, intermediary, agent, distributor, service provider or partner organisation working with Viamed Group of Companies.

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# 4. Gifts, Hospitality and Conflicts of Interest

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## 4.1

Reasonable and proportionate hospitality and business gifts may be accepted or provided where:

- They are lawful
- They are openly declared
- They are not intended to improperly influence a decision
- They are proportionate and reasonable
- They do not create a conflict of interest

## 4.2

Cash gifts or cash equivalents, including vouchers, are prohibited.

## 4.3

Any gift, hospitality or benefit with an estimated value exceeding £40 must be declared to the COMPLIANCE MANAGER.

## 4.4

Employees must avoid situations where personal interests conflict, or may appear to conflict, with the interests of the company.

## 4.5

Any potential conflict of interest must be declared to the COMPLIANCE MANAGER.

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## 5. Employee Responsibilities

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### 5.1

All employees and associated persons are responsible for:

- Reading and complying with this policy
- Acting honestly and ethically
- Preventing and reporting suspected fraud or corruption
- Maintaining accurate records
- Cooperating with investigations
- Completing required training

### 5.2

Employees must not:

- Offer or accept bribes
- Falsify records or invoices
- Misuse company funds or assets
- Conceal financial information
- Circumvent internal controls
- Engage in dishonest or fraudulent conduct
- Retaliate against anyone raising a genuine concern

### 5.3

All financial records, expense claims, purchase records, invoices and supporting documentation must be maintained accurately and completely. Off-book accounts or concealed transactions are strictly prohibited.

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## 6. Reporting Concerns and Whistleblowing

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### 6.1

Any employee or associated person who suspects fraud, bribery, corruption or other unlawful conduct must report the matter immediately to the COMPLIANCE MANAGER, line manager or director.

### 6.2

Reports may include concerns relating to:

- Financial irregularities
- False invoicing
- Procurement concerns
- Supplier misconduct
- Conflicts of interest
- Theft or misuse of assets
- Bribery or improper inducements

- Cyber or payment fraud

### 6.3

Viamed Group of Companies will support any individual who raises concerns in good faith.

### 6.4

No employee will suffer dismissal, disciplinary action, discrimination or retaliation for reporting genuine concerns.

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## 7. Training and Awareness

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### 7.1

Relevant anti-bribery, fraud prevention and compliance training will be provided to employees as appropriate to their role and responsibilities.

### 7.2

New employees will receive awareness of this policy as part of their induction process.

### 7.3

Employees may be required to confirm periodically that they have read and understood this policy.

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## 8. Supplier and Third-Party Expectations

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### 8.1

Viamed Group of Companies expects suppliers, contractors and business partners to operate ethically and maintain appropriate anti-fraud and anti-bribery controls.

### 8.2

The company reserves the right to review supplier compliance where concerns arise.

### 8.3

Where appropriate, contractual arrangements may include anti-bribery, anti-fraud and ethical compliance requirements.

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## 9. Record Keeping and Monitoring

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### 9.1

Viamed Group of Companies will maintain accurate records relating to:

- Financial transactions
- Gifts and hospitality
- Supplier approvals
- Expense claims
- Training activities
- Audits and reviews
- Reported concerns and investigations

## 9.2

Internal controls and procedures will be periodically reviewed to assess their effectiveness.

## 9.3

Audit activities, management reviews, rolling issue reviews and corrective action processes may be used to monitor compliance and identify improvements.

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# 10. Breaches of this Policy

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## 10.1

Any breach of this policy may result in disciplinary action, up to and including dismissal.

## 10.2

Where criminal conduct is suspected, the company may report matters to appropriate authorities including police, NHS Counter Fraud Authority or regulatory bodies.

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# 11. Policy Review

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## 11.1

This policy will be periodically reviewed by the COMPLIANCE MANAGER and company management to ensure continued suitability, adequacy and effectiveness.

## 11.2

The company reserves the right to amend this policy at any time to reflect changes in legislation, operational risks or business requirements.

