



Anti-Bribery and Corruption (ABC) Policy

Asher Excellent Ltd

1. Purpose

Asher Excellent Ltd is committed to the highest standards of integrity, transparency, and accountability in all of its business activities. Our Anti-Bribery and Corruption (ABC) Policy outlines our commitment to ensuring a business environment free from bribery, corruption, and unethical practices.

As a provider of specialist healthcare services for individuals recovering from acquired injuries, Asher Excellent Ltd recognizes the critical importance of ethical conduct in healthcare, where compliance with legal, regulatory, and ethical obligations is vital.

This policy serves to prevent any form of bribery and corruption, ensuring that Asher Excellent Ltd, its employees, contractors, agents, and business partners operate with honesty and fairness. We are dedicated to fostering an organizational culture that promotes ethical behavior, prevents misconduct, and builds trust among employees, clients, and stakeholders.

By adhering to this policy, Asher Excellent Ltd demonstrates its zero-tolerance approach to bribery and corruption, in line with the UK Bribery Act 2010 and other relevant national and international anti-corruption laws. This commitment strengthens our reputation and supports our dedication to providing exceptional care to those recovering from acquired injuries.

2. Scope

This policy applies to all individuals and entities associated with Asher Excellent Ltd, regardless of their role or location. This includes:

- **Employees:** Full-time, part-time, temporary, and contract employees working within Asher Excellent Ltd or on behalf of the company.
- **Contractors and Consultants:** Independent contractors, consultants, and agents working under the direction of Asher Excellent Ltd.

- **Third-Party Suppliers and Partners:** All suppliers, vendors, subcontractors, and service providers engaged by Asher Excellent Ltd.
- **Clients and Business Partners:** Healthcare providers, corporate clients, business partners, and stakeholders with whom Asher Excellent Ltd engages in any form of business or professional relationship.

The policy applies to all activities conducted by or on behalf of Asher Excellent Ltd both in the UK and internationally. This includes but is not limited to:

- **Government Officials and Regulatory Bodies:** Interactions with local, national, and international government officials, regulators, and industry bodies.
- **Healthcare Providers and Clients:** Engagement with healthcare facilities, professionals, and corporate clients.
- **Third-Party Service Providers:** Any form of partnership or agreement with third parties such as staffing agencies, subcontractors, and other service providers.

This policy strictly prohibits any form of bribery, corruption, or unethical influence, whether direct or indirect, in the form of financial or non-financial incentives.

3. Definition of Bribery and Corruption

Bribery and corruption undermine fair business practices, distort competition, and lead to severe reputational, financial, and legal consequences. For the purposes of this policy:

- **Bribery** refers to the act of offering, giving, receiving, or soliciting anything of value (whether financial or otherwise) with the intention of influencing the outcome of business transactions. Examples of bribery include:
 - Offering or accepting money, gifts, hospitality, or services to influence business decisions.
 - Offering business advantages in exchange for personal favors or preferential treatment.
 - Making unlawful payments or donations to secure business, contracts, or opportunities.
- **Corruption** refers to the abuse of power, position, or influence for personal or organizational gain, often involving bribery, fraud, or other dishonest activities. Specific examples include:
 - **Embezzlement:** Misappropriating company funds or assets for personal use.

- **Nepotism:** Offering preferential treatment to family members or friends in hiring, promotions, or contracts.
 - **Fraud:** Manipulating or falsifying documents, records, or information for financial gain.
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4. Zero-Tolerance Approach

Asher Excellent Ltd adopts a strict zero-tolerance approach to bribery and corruption, meaning:

- No employee, contractor, or third party associated with Asher Excellent Ltd is permitted to offer, request, or accept bribes.
- All individuals within the company must adhere to both legal and ethical standards in every business transaction and decision-making process.
- Any breach of this policy will result in immediate disciplinary action, which may include termination of employment, legal action, and financial penalties.

It is expected that all employees and third parties engage in business dealings with the highest standards of honesty, integrity, and transparency. If individuals are unsure about potential risks or ethical concerns, they are encouraged to seek guidance from the appropriate management or compliance officers.

5. Compliance with Legal Frameworks

Asher Excellent Ltd ensures full compliance with all applicable anti-bribery and corruption laws, including:

- The UK Bribery Act 2010, which criminalizes bribery in both the public and private sectors.
- Other relevant national and international anti-corruption laws, including those applicable in jurisdictions where Asher Excellent Ltd operates.
- Industry standards and ethical guidelines established by global healthcare bodies and regulatory agencies.

Asher Excellent Ltd ensures that all employees are regularly trained on anti-bribery laws and regulations to maintain a high standard of legal and ethical compliance. Our policies and practices are continuously updated to align with the latest legal requirements and global best practices in the fight against corruption.

6. Gifts, Hospitality, and Corporate Expenses

Asher Excellent Ltd recognizes that, in certain circumstances, gifts and hospitality may form part of a legitimate business relationship. However, it is critical that such activities do not create the appearance of improper influence or affect decision-making.

- **Acceptable Gifts and Hospitality:**

- Modest business meals, refreshments, or invitations to industry events.
- Promotional items such as branded pens, notebooks, or other items with a low market value (below £50).
- Tokens of appreciation, such as holiday cards or small gifts, subject to management approval.

- **Prohibited Gifts and Hospitality:**

- Extravagant gifts, frequent entertainment, or travel that could influence business decisions.
- Cash or cash-equivalent items, including gift cards, vouchers, or loans.
- Any gift or hospitality that could create a conflict of interest or undermine impartiality.

Employees must report and obtain approval for gifts and hospitality above £50 to ensure transparency and compliance with this policy.

7. Facilitation Payments

Asher Excellent Ltd maintains a firm policy against facilitation payments—unofficial payments made to expedite or secure routine actions by government officials or other authorities.

- Employees and contractors are prohibited from offering, accepting, or making facilitation payments under any circumstances, even if such payments are commonplace in certain jurisdictions.
- If an employee is pressured to make a facilitation payment, they must immediately report the situation to senior management.
- Requests for facilitation payments from third parties should be documented and escalated for review by management.

8. Third-Party Relationships and Due Diligence

Asher Excellent Ltd takes appropriate steps to ensure that all third parties (such as suppliers, agents, and contractors) comply with our anti-bribery and corruption policy. This includes:

- **Due Diligence:** All third-party relationships are subject to a thorough due diligence process to assess potential bribery and corruption risks.
- **Contractual Clauses:** All contracts with third parties must include specific provisions that require adherence to anti-bribery laws and the ethical standards set forth by Asher Excellent Ltd.
- **Ongoing Monitoring:** Regular audits and risk assessments of third-party relationships are conducted to identify and mitigate potential risks.

9. Reporting and Whistleblowing

Asher Excellent Ltd encourages all employees and third parties to report any instances or suspicions of bribery or corruption. We provide a confidential and secure whistleblowing mechanism to ensure that individuals can report unethical conduct without fear of retaliation.

- Reports can be made anonymously or directly to management, compliance officers, or through an independent whistleblowing hotline.
- We guarantee that all reports will be thoroughly investigated, and appropriate actions will be taken.
- Retaliation against whistleblowers is strictly prohibited, and any such action will result in disciplinary consequences.

10. Enforcement and Consequences

Any employee, contractor, or third party found to have violated this policy will face serious consequences, including:

- **Disciplinary Action:** Immediate termination of employment or contracts for employees or business partners found in violation.
- **Legal Action:** Prosecution under applicable laws, including the UK Bribery Act 2010, and other international anti-corruption statutes.

- **Financial Penalties:** Imposition of significant fines and penalties for both individuals and the company.
- **Reputational Damage:** Loss of trust, public confidence, and damage to the company's brand and market position.

Asher Excellent Ltd is committed to ensuring compliance with this policy, maintaining the highest ethical standards, and promoting a culture of integrity across all its business dealings.