

Anti-Bribery and Corruption Management Statement

SpaMedica is committed to upholding the highest standards of ethical conduct and integrity in its business activities in the UK. Every employee and individual acting on SpaMedica's behalf are responsible for maintaining the company's reputation and conducting business honestly and professionally.

SpaMedica will not tolerate any form of bribery, whether direct or indirect, by or of its employees, officers, agents or any persons or companies acting for or on its behalf. The company is dedicated to implementing and enforcing effective systems to prevent, monitor, and eliminate bribery in accordance with the Bribery Act 2010. This includes the prohibition of accepting any gift or hospitality that could compromise the integrity and reputation of our organisation.

An Anti-Fraud, Bribery and Corruption Policy, outlining SpaMedica's position on preventing and prohibiting bribery, is included in the Employee Handbook and available on SpaMedica's intranet. This policy applies to all employees, agency workers, consultants, and contractors, who are required to familiarise themselves with and comply with the policy with immediate effect.

A bribe is defined as a financial advantage or other reward offered, given, or received by an individual or company (directly or indirectly) to induce or influence improper performance of public or corporate functions or duties.

Employees and others are strictly prohibited from making, soliciting, or receiving any bribes or unauthorised payments. Any breach of SpaMedica's Anti-Fraud and Bribery Policy by an employee will be grounds for disciplinary action, which may result in a finding of gross misconduct and immediate dismissal. Employees and individuals acting for SpaMedica should note that bribery is a criminal offence that may lead to imprisonment and/or unlimited fines.

SpaMedica will not conduct business with service providers, agents, or representatives that do not support the organisation's anti-bribery objectives. SpaMedica reserves the right to terminate contractual arrangements with any third parties acting for or on behalf of SpaMedica with immediate effect if there is evidence of bribery.

The success of SpaMedica's anti-bribery measures relies on the cooperation of all employees and those acting for SpaMedica in detecting bribery. Therefore, all employees and others acting for or on behalf of SpaMedica are encouraged to report any suspected bribery in accordance with the procedures set out in the Anti-Fraud and Bribery Policy. SpaMedica will support any individuals who make such a report, provided it is made in good faith.

Richard Woodward
Chief Executive Officer