

## **Anti-bribery policy**

Physiomics prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of Physiomics or of the person or body employing them or whom they represent.

### **Introduction**

Prevention, detection and reporting of bribery are the responsibility of all employees. You must report any suspicion of bribery.

### **Purpose**

The purpose of this document is to serve as a guide for all employees of Physiomics plc ("Physiomics"); it explains the steps needed to be followed in order to ensure Physiomics maintains its values, adheres to corporate responsibility, society and legal expectations.

### **Policy**

You must not, directly or indirectly,

- offer; give; solicit or accept any bribe, either in cash or any other form of inducement, to or from any person or company, wherever they are located and whether they are a public official or body or private person or company.
- gain any commercial, contractual or regulatory advantage for Physiomics in a way which is unethical.

### **Responsibility**

This policy is applicable to all employees of Physiomics, regardless of seniority.

You should not be prohibited from performing your work provided the activities are customary, appropriate and properly recorded, for example acceptable activities include:

- normal hospitality
- providing ceremonial gift on a festival or at another special time
- fast-tracking a process when it is available to all on payment of a fee
- providing resources to assist the person or body to make the decision more efficiently provided it is for this purpose only

Remember that market practice varies between countries and what is normal and acceptable in one place may not be in another, moreover our ethical values underpin any activity you undertake.

### **Adherence**

It may not be easy to make a decision if something is appropriate. If you are in doubt that a potential act does not conform to this policy, the matter should be referred to a director or the company secretary.

Physiomics will investigate seriously any actual or suspected breach of this policy, or the spirit of this policy. Employees may be subject to disciplinary action and which may ultimately result in their dismissal. In the case of third parties found to be bribing or attempting to bribe Physiomics employees, a senior officer, a supplier or customer they will be informed in writing business dealings will be ceased and appropriate authorities will be informed.