

Bribery and Anti-Corruption Policy

1. OBJECTIVE

This policy sets out TANAMA overall position on bribery and corruption in all its forms.

2. APPLICATION

This Policy applies to all Tahama Health Ltd. directors, officers, employees, or representatives acting on behalf of TANAMA (hereinafter referred to as “TANAMA”).

Third party means any individual or organisation you come into contact with during the course of your work, and includes actual and potential clients, customers, suppliers, providers, users, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

3. POLICY

TANAMA employees are not permitted to give, offer, promise, accept, request or authorise a bribe or gratification, whether directly or indirectly.

Employees are expected to decline gifts and benefits offered by third parties.

4. REPORTING OF POLICY VIOLATIONS

Suitable reporting channels shall be established and maintained for receiving information regarding violations of this policy, and other matters of integrity provided in good faith by TANAMA personnel and/or external parties.

Personnel who, in the course of their activities relating to their employment at TANAMA, encounter actual or suspected violations of this policy are required to report their concerns using the reporting channels stated.

Reports made in good faith, either anonymously or otherwise, shall be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation.

Retaliation in any form against TANAMA personnel where the person has, in good faith, reported a violation or possible violation of this policy is strictly prohibited.

Any TANAMA personnel found to have deliberately acted against the interests of a person who has in good faith reported a violation or possible violation of this policy shall be subjected to disciplinary proceedings including demotion, suspension, dismissal or other actions (including legal action) which TANAMA may pursue

5. DEFINITIONS

“**Bribery & Corruption**” means any action which would be considered as an offence of giving or receiving ‘gratification’. In practice, this means offering, giving, receiving or soliciting something of value in an



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attempt to illicitly influence the decisions or actions of a person who is in a position of trust within an organisation.

“Gratification” is defined as the following:

(a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being the property of any description whether movable or immovable, financial benefit, or any other similar advantage;

(b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;

(c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;

“Third party” means an external party with whom TANAMA has, or plans to establish, some form of business relationship. This may include clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors.

“Conflict of Interest” means when a person’s own interests either influence, have the potential to influence, or are perceived to influence their decision making at TANAMA.

“Personnel” means directors and all individuals directly contracted to the Company on an employment basis, including permanent and temporary employees.