

ANTI-BRIBERY AND CORRUPTION POLICY

Medicash is committed to ensuring that all of its activities are conducted in accordance with all applicable legal and regulatory requirements and the highest standards of ethical business conduct.

Bribery or corruption can be described as the offering, promising, giving, accepting or soliciting by a person (person A) of an advantage as an inducement for an action by a person (person B) which is illegal or a breach of trust. Bribery generally involves paying or offering to pay money or something of value to someone in business or in the public sector in order to obtain or retain a commercial advantage or to induce or reward the recipient for acting improperly. Corruption can also take place where the offer or payment is made through a third party (person C). In each case, all the persons A, B and C, as well as any other persons who were complicit in the offence, may be guilty of bribery and corruption.

The most prevalent forms of bribery and corruptions stem from:

- Payments to a company's employees, or to those of a third party, to secure advantage in business transactions
- Political contributions made to secure advantage in business transactions
- Charitable sponsorships used to ensure business transactions
- Gifts, hospitality and expenses payments made to secure advantage in business transactions
- Uncompensated use of company services, facilities or property.

Medicash prohibits employees (whether acting in their own capacity or on the Company's behalf) from offering, promising, giving or authorising (directly or indirectly) any bribe, facilitation payments or kickbacks to or for the benefit of any person in order to obtain any improper business advantage for the company or themselves.

Whilst the Medicash Charitable Trust (part of the Medicash group) gives grants to charities, these grants will never be linked to securing business for the benefit of Medicash Health Benefits Limited.

The integrity of accounting records of Medicash is essential. All receipts and expenditures will be prepared and maintained with strict accuracy and completeness, supported by documents that accurately describe all dealings with third parties.

The falsification of any account of the company and the submission of any false personal expense statement or claim for reimbursement of a non-business personal expense is strictly prohibited.

All employees are required to comply with all aspects of this policy and failure to do so will result in a disciplinary hearing which may lead to dismissal and criminal liability. Employees must also co-operate fully and openly with any investigation by the company into alleged or suspected breaches of this policy. Failure to co-operate or to provide truthful information during any investigation would likely lead to employees being subject to serious disciplinary action.