Gifts and Hospitality: Decision Making

All gifts and hospitality¹ offered/received should be consistent with the <u>Medicom Group's Anti-Bribery & Anti-Corruption Policy</u>.

Offering/acceptance should not constitute an actual or perceived conflict of interest.



- 3. Is it being offered/received during a tender/procurement process?
- 4. Is there a government or elected official involved?



This could be considered a bribe. You should decline the offer and email details to compliance@medicom.com.



Is the gift/hospitality worth more than 50\$?



No requirement to record or seek prior approval.



Seek permission from the Ethics Committee. Record on the Gifts & Hospitality Register.

¹ Travel and restaurants (outside the business context), entertainment or invitations to events and training are considered gifts.





