

Blink Medical Anti-Bribery Policy

Blink Medical Limited is committed to conducting our business in an open, honest and ethical manner, and we take a zero-tolerance approach to all forms of bribery and corruption. In short, we will not condone under any circumstances the offering, receiving or facilitation of bribes or any form of improper payments and we will always adhere strictly to the relevant laws in relation to corruption.

Our Policy

Our policy is straightforward. Blink Medical and anyone associated with our business must not in any circumstances:

- Offer, promise or give bribes
- Request, agree or accept bribes; or
- Facilitate the giving of bribes.

Principles to Follow

Bribery and Corruption Risks

Follow our "Don't" rules and avoid the risk of bribery or corruption and a breach of our policy. So, **Don't:**

- Make payments or provide gifts, entertainment or favours if this could lead to someone misusing their position or performing their job improperly;
- Misuse your position (or perform your job improperly) in connection with payments, gifts, entertainment or favours provided to yourself or others; or
- Provide gifts, entertainment or favours to public officials, except in strict accordance with our rules.

Gifts and Entertainment

The giving or receiving of reasonable gifts and entertainment is permitted, but only if the following rules are followed:

- They are intended only to foster legitimate business relations;
- They are provided to public officials only in strict accordance with our rules;
- Their nature, their timing and the circumstances in which they are given, are not capable of either improperly influencing the recipient or being perceived as improperly influencing them;
- The rules or laws applying to the recipient will not be breached by the giving of the gift or entertainment;
- The value of all gifts given to or received from a single person does not exceed £100 in any month period and;
- A record of all relevant entertainment and gifts given or received is retained by the individual employee and Blink Medical Ltd.

Facilitation Payments

Facilitation payments are small unofficial payments to speed up administrative processes or ensure official progress governmental activities. No matter how small or insignificant they may seem, they are bribes and are prohibited by the policy. The only circumstances in which they should be paid are if you are in fear of your personal safety or liberty. In these and all other cases, always report the incident and if possible seek assistance from your HR Department.

Anti-Bribery Training

Risk assessments in regard to employee's roles within Blink Medical Limited shall be conducted on a periodic basis and training in Anti-Bribery provided. Training requirements shall be identified by the HR Department and provided via an online training module. Records of all employees training shall be kept by the HR Department.

Where to Get Help

Anti-bribery and corruption laws can be complicated, and we understand that sometimes it can be difficult to know what is okay and what is not. If you are ever in any doubt, then the first thing you should do is stop and ask.

- Read the Anti-Bribery Policy
- Revisit your Anti-Bribery training
- Contact Roger Tyler, Managing Director, Blink Medical Limited

And if you know, suspect or are just worried that something is going wrong, you must report it. You can speak at any time with your line manager or Roger Tyler.

About this Policy

- This policy was published on 1st January 2018.
- In certain countries, local laws impose different requirements in respect of anti-bribery and corruption. This policy is subject to local laws, which we will always abide by and which will be reflected in local policies if required. Where a local policy intended to apply in place of this policy, we will say so. Otherwise, local policies will be applied in a way this is consistent with this policy and its aims.
- This policy applies to all "associated persons" of Blink Medical Limited. An associated person is anyone who performs services for or on behalf of the Blink Medical Limited. This includes employees, officers, consultants, casual workers or agency workers.
- Associated persons also include third parties who act as an agent on behalf of Blink Medical Limited or who have either some authority to commit Blink Medical Limited in commercial transactions or expend sums on its behalf. Consequently, it is intended that this policy should be applied by such third parties in the course of their performance of services for or on our behalf.
- This policy does not form part an any employee's contract of employment and we may amend it at any time.
- Directors of Blink Medical Limited have overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

- Roger Tyler, Managing Director has day-to-day operational responsibility for this policy, but management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy.
- The Directors of Blink Medical Limited should review this policy periodically from a legal and operational perspective.
- All Blink Medical Limited employees are responsible for the success of this policy. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to Roger Tyler.
- **Any person to whom this policy applies and who breaches this policy will be subject to disciplinary action up to and including dismissal, as well as civil and/or criminal legal sanctions that may arise.**

Signed:



Roger Tyler – Managing Director

Date:

5/3/18