

Freeway Medical Policy on Anti-Bribery & corruption

Renewed 2026-27

Commitment to Integrity & fairness

Freeway Medical – Chromis UK is committed to conducting business with integrity, transparency, and accountability. This Anti-Bribery Policy outlines our commitment to preventing bribery and corruption in all its forms within our operations and business dealings.



Policy Scope

This policy applies to all employees, officers, directors, contractors, consultants, agents and other persons acting for or on behalf of Freeway Medical / Freeway Med-Tech, trading names of Chromis UK Ltd. It applies to business conducted in the UK and overseas.

1. Policy Statement

Bribery and corruption are strictly prohibited. Chromis UK Ltd adopts a zero-tolerance approach to bribery and expects employees and associated persons to comply with this policy and all applicable anti-bribery laws, including the UK Bribery Act 2010.

2. Definitions

Bribery: offering, promising, giving, requesting, agreeing to receive or accepting a financial or other advantage to induce or reward improper performance.

Corruption: abuse of entrusted power for private gain.

Facilitation payments: unofficial payments intended to secure or speed up routine action. These are prohibited.

3. Key Principles

Prohibition of bribery: no employee or associated person may offer, give, request, receive or authorise a bribe, directly or indirectly.

Gifts and hospitality: reasonable, proportionate and legitimate business hospitality may be permitted. It must never be intended to influence a decision improperly, create an obligation, or be offered or accepted during a sensitive procurement or tender decision where it could reasonably be perceived as improper. Gifts and hospitality must follow company approval and recording requirements.

Facilitation payments and kickbacks: prohibited. Any request for such a payment must be reported.

Political contributions: no political contribution may be made on behalf of the company.

Charitable donations and sponsorship: must be lawful, transparent, appropriately approved and never used to conceal bribery.

Conflicts of interest: actual or potential conflicts must be declared promptly and managed transparently.

Accurate records: payments, expenses, gifts and hospitality must be recorded accurately. False, misleading or off-book records are prohibited.

4. Responsibilities

Employees and associated persons must comply with this policy, complete required training and report concerns. Management is responsible for setting the tone from the top and ensuring proportionate controls are implemented. The Anti-Bribery Compliance Officer oversees implementation, advice, monitoring and review.

5. Risk Assessment

Bribery risks will be assessed periodically and when material changes occur, taking account of countries, customers, public-sector interaction, tenders, intermediaries, transaction values and business partners. Controls will be proportionate to the risks identified.

6. Due Diligence

Risk-based due diligence will be undertaken on suppliers, agents, distributors, contractors and other business partners where appropriate. Higher-risk relationships may require enhanced checks, contractual commitments and ongoing monitoring.

7. Training and Communication

Relevant employees will receive proportionate anti-bribery training. This policy will be communicated internally and, where appropriate, to persons acting on the company’s behalf.

8. Reporting and Whistleblowing

Employees and third parties are encouraged to report suspected bribery, corruption, improper gifts, conflicts or requests for facilitation payments. Concerns may be raised confidentially with the Anti-Bribery Compliance Officer.

No person who raises a genuine concern in good faith will suffer retaliation or adverse treatment for doing so.

9. Monitoring and Review

Compliance will be monitored through proportionate checks, management oversight and review of relevant records. The policy will be reviewed at least annually and following significant legal, organisational or risk changes.

10. Consequences of Non-Compliance

Breach of this policy may result in disciplinary action, termination of employment or contract, and referral to the appropriate authorities where required.

11. Contact Information

For questions, guidance or to report a concern, contact the Anti-Bribery Compliance Officer:

ian.jones@freewaymedical.co.uk | 01635 868 191

12. Approval and Review

This policy is approved by the management of Chromis UK Ltd. It reflects the company’s commitment to proportionate bribery-prevention procedures, including top-level commitment, risk assessment, due diligence, communication and training, and monitoring and review.

Policy reviewed: 28 September 2026

Next review: September 2027, or earlier if required.

Signed on behalf of Freeway Medical / Freeway Med-Tech - trading names of Chromis UK Ltd.



Director / authorised signatory

RENEWED 2026-27