

Policy on Anti-Bribery & Corruption for Ceylon Hospitals PLC

Purpose

The policy has been developed to focus on the importance of the anti-bribery and corruption to all the staff that might include medical or nonmedical and the forms of bribes and corruption can take place at Ceylon Hospitals PLC while carrying out daily tasks.

In addition to this, to highlight that Ceylon Hospitals PLC will not tolerate any act of bribery or corruption dealings in carrying out the service to patients or any business transactions. Therefore, any corruption or bribery should be completely eliminated from the business.

Scope and range of the application

This policy is intent to address all the clinical nonclinical staff, administration, directors, third parties and any other stakeholders that indirectly or indirectly impact the business.

1. Risk or consequence of Noncompliance

Bribery and corruption will lead to severe criminal penalties and reputational damage to Ceylon Hospitals PLC. Stakeholders involved violating the policy will also be subject to criminal penalties and negative goodwill to the hospital.

As the nature of the business is service industry, the primary focus is on unbiased and satisfied service to the community. Therefore any corruption or bribery at Ceylon Hospitals PLC is strictly prohibited and internally serious actions will be taken against any employees regardless of status, designation, race or any other factors.

2. Applicable Laws

Bribery Act (1954)

This act criminalises the offering, giving, receiving, or soliciting of bribes. It applies to both public and private sectors and outlines penalties for those involved in bribery.

Prevention of Bribery and Corruption Act (1988): This act established the Commission to Investigate Allegations of Bribery or Corruption (CIABOC). It provides a framework for the investigation and prosecution of bribery and corruption offenses.

Constitution of Sri Lanka: The Constitution includes provisions that promote transparency and accountability in public service and governance.

Public Contracts Act: This act regulates public procurement processes to prevent corruption and ensure fair competition.

Other Laws: Additional laws, such as the Penal Code, also address related offenses like fraud, money laundering and abuse of power.

International Commitments: Sri Lanka is a signatory to various international conventions, including the United Nations Convention against Corruption (UNCAC), which provides guidelines for combating corruption at multiple levels.

3. Definition

Bribery

This involves dishonestly persuading someone to act in one's favour by a gift of money or other inducement. Forms of bribery in a corporate:

I. Kickbacks

Benefit received in exchange of an improper/illegal/unethical service rendered.

II. Facilitating payment

Any type of payments paid to government officials to gain illegal or unethical advantage of the process in place for one's own benefit.

Corruption

Corruption involves misuse of one's influence or authority for own advantage of that individual.

Corruption can take many forms however in business it mainly involves exercising one's authorization in a way one should not.

4. Policies at Ceylon Hospitals PLC

I. External, internal transactions

Ceylon Hospitals PLC strictly condemns any act of bribery or corruption that shall take place in any transactions that could be internal or external.

II. Government related transactions

Any government dealings are to be appropriately dealt with authorised personal in charge and any ways of bribes are strictly prohibited. Bribing a government official will lead to severe penalties and imprisonment as per the Sri Lankan law acts.

III. Third-parties

Any employees at Ceylon Hospitals PLC should not request or receive bribes from any third party to facilitate any process or transaction in favour of them or to influence any decisions made by Ceylon Hospitals PLC.

IV. Donations

Any donations intent to be made in exchange of favor is prohibited.

5. Conclusion

As a leading hospital in Sri Lanka, Ceylon Hospitals PLC strictly adhere to the law and principles of anti-corruption and bribery. Therefore Ceylon Hospitals PLC highlights that the followings practices and policies are in place to discipline the staff and to highlight the importance of anti-bribery and corruption at Ceylon Hospitals PLC.

I. Gifts and hospitality policy

Employees are required to adhere to gift and hospitality policy that is already in place and circulated.

II. Training and Awareness

Mandatory training programs for employees at all levels to educate them about criminal laws regarding corruption and bribery, the company's policies, how to recognize and report potential issues, which also includes the consequences of violation of the policy and the impact of the same to the staff.

III. Reporting Mechanisms

Staff awareness on the importance of communication of any activities related to bribery and corruption to the delegated reporting line at Ceylon Hospitals PLC and to make it clear that any such communications are highly confidential and private.

IV. Monitoring and Auditing

Regular audits and monitoring of transactions and any unusual activities of the staff.

V. Continuous improvement

The policies, procedures will be regularly updated, reviewed, and circulated among the staff to practice and implement the same.