

Anti-Bribery and Corruption Policy

Phunciona Gestión Hospitalaria, SA (the “company”) is a special purpose company set up to manage the design, construction, facilities management and financing of the [Project name] PFI.

The company principle regarding the treatment of bribery and corruption is to:

Refuse to offer, give or receive bribes or improper payments, or participate in any kind of corrupt activity, either directly or through any third party.

The Anti Bribery and Corruption Policy of the company is

never to:

- participate in any form of corrupt behaviour;
- engage public officials to provide services without proper approval from the company board;
- conceal or fail to record accurately and completely the true nature of our activities, or falsify or tamper with the company’s books or records;
- pay more than fair market value for goods and services;
- make facilitation payments (except where such payments are expressly permitted by written law);
- give or receive gifts or hospitality which could be, or be seen as, an improper inducement, or as creating a conflict of interest;
- give political or charitable contributions (including sponsorships and other advantages) for improper purposes; or
- engage third parties to make improper payments or participate in any kind of corrupt activity on its behalf;

always to:

- seek to avoid even the appearance of wrongdoing, recognising that an allegation of bribery or corruption can seriously damage the company’s reputation;
- carry out appropriate anti-bribery due diligence when engaging or entering into contracts with third parties;
- ensure contract and procurement documents include appropriate anti-bribery measures and comply with Code of Conduct 2020;
- ensure company staff and/or those persons operating on behalf of the company receive training regarding Bribery and Corruption policy and procedures and understand the implications of non-compliance;

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- ensure that the company has in place adequate procedures for company representatives to report instances or allegations of bribery or corruption;
- through financial and governance procedures assess compliance with this policy;
- maintain a gifts and hospitality register to record all instances of gifts (>50 €) or hospitality (>100 €) given or received, seeking approval in advance (if practicable) from at least one Director.



Signed for and on behalf of
Phunciona Gestión Hospitalaria, SA

Casildo Sánchez Mantas

29th November 2022

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Director

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Date

Date of Next review:

The company board will review this policy on an annual basis to ensure its continued suitability