

Anti-Bribery Policy

Canon Medical Systems Ltd

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. Canon Medical Systems Ltd employees shall not give or offer any bribe to Public Officials or persons within the private sector either directly or indirectly, nor shall they accept a bribe from any party.

Bribes can take an extremely wide range of form and content of the benefit that can be offered, provided or accepted. The simplest form would be the provision of cash, although a benefit that can be judged as a bribe could include any type of goods from clothing and food, to stock, art pieces and property. These benefits can range to include gifts, entertainment, loaning of items, relationships, provision of a professional service etc., in fact any form of interest that satisfies needs or desires. The improper advantage obtained is similarly broad, and can be provided by any person in the public or private sector. Bribes explicitly include facilitation payments. A common example of a facilitation payment is where a government official is given money or goods to perform (or speed up the performance of) an existing duty.

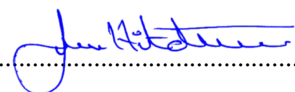
It is our policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption. In this context zero tolerance means that any act of bribery or corruption will be treated as gross misconduct and Canon's disciplinary policy will be applied accordingly. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad. We also subscribe to the COCIR and AXrEM Codes of Conduct, which detail the rules around interacting with Health Care Professionals and have implemented procedures accordingly.

This policy implements the requirements of POL-0002 Anti-Bribery, and is in line with the Canon Medical Systems Standards of Conduct paragraph 7 on Bribery.

As an ethically run company, our zero tolerance approach is applied rigorously. Bribery and corruption are very serious offences. Breaches of this policy will therefore have serious consequences for partners or individuals involved.

Mark Hitchman
Managing Director



Date 19th March 2021