



同善医院

TUNG SHIN HOSPITAL

since 1881

# ANTI BRIBERY AND ANTI CORRUPTION POLICY

*Version 1.0 (2020)*

## **Contents**

<b>1. PHILOSOPHY</b> .....	<b>2</b>
<b>1.1 Message From The Chairman</b> .....	<b>2</b>
<b>1.2 Guarding Against Bribery and Corruption</b> .....	<b>4</b>
<b>1.3 Zero Tolerance for Bribery and Corrupt Practices</b> .....	<b>4</b>
<b>2. POLICY</b> .....	<b>6</b>
<b>2.1 Objective</b> .....	<b>6</b>
<b>2.2 Scope</b> .....	<b>6</b>
<b>2.3 Definitions</b> .....	<b>6</b>
<b>2.4 Ethics and Integrity Committee</b> .....	<b>8</b>
<b>2.5 Breach of Confidentiality Policy</b> .....	<b>8</b>
<b>2.6 Gift, Entertainment and Hospitality Policy</b> .....	<b>8</b>
<b>2.6.1 Gifts</b> .....	<b>9</b>
<b>2.6.2 Entertainment</b> .....	<b>10</b>
<b>2.6.3 Hospitality</b> .....	<b>10</b>
<b>2.7 Donation and Sponsorship Policy</b> .....	<b>11</b>
<b>2.8 Regulation on Political Contributions</b> .....	<b>12</b>
<b>2.9 Providing False or Misleading Information Guidelines</b> .....	<b>12</b>
<b>2.10 Relationship With Business Associates Policy</b> .....	<b>12</b>
<b>2.11 Conflict of Interest</b> .....	<b>13</b>
<b>2.12 Facilitation Payments Guidelines</b> .....	<b>13</b>
<b>2.13 Protection and reporting violations</b> .....	<b>14</b>
<b>2.14 Consequences of breaches</b> .....	<b>14</b>
<b>2.15 Annual declaration of compliance</b> .....	<b>14</b>
<b>2.16 Training</b> .....	<b>15</b>

## 1. PHILOSOPHY

### 1.1 Message From The Chairman

We are committed to conducting our business ethically and in compliance with all applicable laws and regulations, including the Malaysian Anti-Corruption Commission Act and other countries that prohibit improper payments to obtain a business advantage. We specifically prohibit bribery or other improper payments (both giving and receiving) in any of our business operations. This prohibition applies to all business activities, anywhere in the world, whether involving government officials, private individuals, agents or other commercial entities.

As an employee, business partner, consultant or counterparty (including agents, intermediaries, suppliers and vendors), you must be aware that a bribe or other improper payments to secure a business advantage is never acceptable and can both expose the individual and our organization to possible criminal prosecution, reputational damage or other serious consequences. Improper payments prohibited include bribes, kickbacks, excessive gifts or entertainment or any other payment made or offered to obtain an undue business advantage. These payments should not be confused with reasonable and limited expenditures for gifts, business entertainment and other legitimate activities directly connected to our business. We recognize that discerning whether a gift, entertainment or benefit is within acceptable limits or in excess can be difficult and in guiding our decisions, we ask that every employee, consultant, business partner or counterparty answer these guiding questions:

- a. Would the receiving of this gift affect my ability to stay neutral in connection with any decision made in connection with this business/project? ; and
- b. What would a normal member of public think about this benefit/gift/donation/entertainment? Would this person see it as a normal business practice or would he/she conclude that there is an element of 'wrongfulness' or 'improperness' involved?

In other words, you are the best person to judge whether a benefit being received falls within the norms or business practices or is excessive and consequently violates our anti-bribery and anti-corruption policies as well as the law by referring to these guiding questions. If you are of the view that a bribery or potential bribery act has been committed, we encourage you to report this matter immediately and any person reporting such incidents can do so without any fear of retaliation or reprisal.

Our Hospital has also developed a comprehensive programme for implementing this policy, through appropriate training, guidance, investigation and oversight. Our Ethics and Integrity Committee will have overall responsibility for this programme and will have the total support from the Tung Shin Council. Lets work together to run our business ethically, based on merit and with a clear moral compass.

Thank You.



## **1.2 Guarding Against Bribery and Corruption**

We adopt a zero-tolerance stance against any form of bribery and corruption in all our business dealings. We are committed to conduct our business professionally and ethically at all times and in compliance with anti-bribery and corruption laws and regulations in all jurisdictions we operate in.

## **1.3 Zero Tolerance for Bribery and Corrupt Practices**

We strictly prohibit any attempts to influence business decisions directly or indirectly by paying or receiving bribes and kickbacks or any other methods deemed illegal or unethical. We recognise that bribery and corrupt practices will not only expose us to legal and criminal consequence but adversely impact our brand and reputation.

We will protect our employees from any adverse consequences such as reprisals or retaliation arising from their refusal to give or accept bribes or engage in any corrupt practices. This protection is given even if such action (refusal) may result in the Hospital losing business and/or not meeting targets. Further, we will also strive to protect the anonymity of anyone reporting any acts of bribery and corruption and further protect our employees from any reprisals or retaliation for their reporting.

To avoid being implicated in a corrupt act, we must not directly or indirectly:

- Promise, offer, grant or authorise the giving of money or anything else of value to anyone to obtain or retain a business or an advantage in any business dealing. This also includes refraining from promising, offering, granting or authorise the giving of money or anything else of value which may create the impression of us seeking to create an advantage in our business dealings.
- Solicit, receive or authorise the acceptance of money or anything else of value, from anyone to influence the outcome of any of the Hospital's business decisions.
- Be involved in any corrupt act or conduct, which include but are not limited to the abuse of position / authority and falsification of documents.
- Receive commissions that may be perceived as bribes or used by the recipient to pay bribes or for other corrupt purposes.
- Make and/or receive facilitation payments ('grease payments') which are regarded as payments to gain access, secure or expedite the otherwise routine function that they are duty-bound to perform.
- Be involved in any activity or behaviour that could give rise to the perception or suspicion of any corrupt conduct or the attempt thereof.
- Conceal or take any step that could delay information that a bribe, improper advantage or facilitation payment has been given or received.

As part of the Hospital's effort to prevent corrupt acts, we must:

- Endeavour to ensure that Counterparties (including our business partners and suppliers) do not promise, offer or give any such improper advantage on behalf of the Hospita.
- Inform the Hospital when we encounter with any request for a facilitation payment or if a payment which could possibly be misconstrued as a facilitation payment have been made.

- We expect all Counterparties (including our business partners and suppliers) to not promise, offer or give any improper advantage for and on behalf of the Hospital.
- In the event of any breach to this policy, we will not hesitate to take the necessary actions which include but not limited to taking internal disciplinary action, severing business ties with our business partners and suppliers as well as reporting the matter to the relevant authorities.

## 2. POLICY

### 2.1 Objective

The objective of this Anti-Bribery and Anti-Corruption Policy is to:

- a) set out the responsibilities of Tung Shin Hospital in observing and upholding the Hospital's position on bribery and corruption, in order to ensure that the Hospital complies with applicable laws, regulations and policies and procedures;
- b) ensure that the Hospital has adequate procedures in place to prevent and detect bribery and corruption;
- c) sets out the responsibilities of Directors, Employees and Business Associates in complying with and upholding the Hospital's position against Bribery and Corruption;
- d) provides guidelines and information to Directors, Employees and Business Associates on refraining from and where applicable, dealing with acts of Bribery and Corruption; and
- e) protect the Hospital against the possible penalties and repercussions resulting from acts of bribery and corruption or being associated with such behaviour.

This Anti-Bribery and Anti-Corruption Policy is not intended to provide definitive answers to all questions regarding bribery and corruption. Rather, it is intended to provide employees with a basic introduction as to how the Hospital fights bribery and corruption in furtherance of the Hospital's commitment to lawful and ethical behaviour. Some of the guidelines stated in this Policy are designed to prevent situations in which bribery and corrupt practices may take place.

### 2.2 Scope

The Policy applies to all Directors and Employees.

The Hospital also requires all its Business Associates and other parties providing goods and services to or on behalf of the Hospital in any capacity to comply with all applicable provisions of the Policy, in the course of providing goods and services to the Hospital.

### 2.3 Definitions

2.3.1 "**corruption**" is the act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to a person's job description.

2.3.2 "**bribe**" or "**gratification**", as defined in the Malaysian Anti Corruption Commission Act 2009, is:

- a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
- b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;

- e) any forbearance to demand any money or money's worth or valuable thing;
- f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
- g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).

2.3.3 "Business Associates" means an external party with which or whom the Hospital has, or intends to establish a business relationship, which includes advisors, agents, clients, contractors, sub-contractors, consultants, customers, consortium partners, joint venture partners, intermediaries, investors, representatives, service providers, suppliers, vendors, donation or sponsorship beneficiaries and any associations, bodies or entities formed by law, wherever located.

2.3.4 "Directors" mean any and all directors in the Hospital, including independent, non-independent, executive, non-executive and alternate, wherever located.

2.3.5 "Employees" mean all employees as defined and included in Section 2.2 of the Employee Handbook, which may be amended from time to time.

2.3.6 "**Public Official**" means:

- a) any person holding a legislative, administrative or judicial office of a country, government, state, province or municipality, whether appointed or elected;
- b) any person exercising a public function for a country, government, state, province or municipality, including for a government agency, board, commission, corporation, or other body or authority;
- c) any official or agent of a public international organisation; or
- d) any political party or official of a political party or a candidate for public office.

2.3.7 "Corporate Gift" means something given by one organisation to another, with the appointed representatives of each organisation giving and accepting such gift, and may take the form of promotional items given out equally to the general public at events, trade shows and exhibitions as a part of building the Company's brand, with such gifts given transparently and openly with the express or implied approval of all parties involved, as well as normally bearing the Hospital or the Business Associate's name and logo, such as diaries, table calendars, stationery, plaques or trophies.

2.3.8 "Hospitality" means the considerate care of Business Associates, which may include food and beverages, refreshments, accommodation, transportation/travel and entertainment at restaurants, hotels, clubs, resorts



and other similar facilities, including leisure, sporting and healthcare activities or services of any kind.

2.3.9 “Code of Business Conduct and Ethics” means the code of business conduct and ethics in Section 3 of the Employee Handbook, as amended from time to time.

2.3.10 “Facilitation Payment” means payments made to secure or expedite the performance by a person performing a duty, function or responsibility of any kind, and include cash, payments in kind and financial and non-financial advantages with the intention of influencing them in the performance of their duty, function or responsibility.

#### **2.4 Ethics and Integrity Committee**

This committee oversees the anti-corruption programme compliance matters of the Hospital in accordance with its Terms of Reference and in respect of the Malaysian Anti-Corruption Commission Act 2009.

#### **2.5 Breach of Confidentiality Policy**

Leaking confidential information about the Hospital to third parties (without prior approval) is a major misconduct and a breach of the Hospital's Code of Business Conduct and Ethics.

Confidential information of the Hospital includes any and all trade secrets, confidential, private or secret information of the Hospital including without limitation (i) business and financial information of the Hospital, (ii) business methods and practices of the Hospital, (iii) marketing strategies of the Hospital, (iv) customer, personal or business affiliate information of the Hospital, and (v) such information as the Hospital may from time to time designate as being confidential to the Hospital. Confidential information will not include information that is in the public domain, or information that falls into the public domain, unless such information falls into the public domain by disclosure or other acts by the Employee, or through the Employee’s fault.

Any breach of the confidentiality policy shall result in disciplinary action against the Employee, including termination of employment (or service) and/or the institution of legal proceedings.

#### **2.6 Gift, Entertainment and Hospitality Policy**

We recognise that business hospitality in the form of gift, entertainment and hospitality builds relationships with Suppliers and Business Associates. We accept that there are occasions when provision and acceptance of such business hospitality is appropriate and should not create an appearance of unfair advantage/benefit and impropriety or misconstrued or perceived to be a bribe or gratification.

To avoid the risk of creating an appearance of unfair advantage, provision of such hospitality as part of normal business operations must be legitimate, proportionate in the context of our operations and occur sparingly.

Given this, it is imperative that employee must disclose to his or her Head of Division /Department the value of any gifts, entertainment or hospitality he/she has received from any third party, business partner or stakeholder. Further, an employee should also ensure that gifts, entertainment and hospitality provided to any other business partner or potential business partner or stakeholder is approved by the Secretary General/Tung Shin Council. Disclosure and prior approval is paramount here and extends to cover any immediate family members of the employee providing or receiving such gifts, entertainment or hospitality.

### **2.6.1 Gifts**

All Directors and Employees are prohibited from receiving, seeking or soliciting gifts from Business Associates. The Hospital prohibits the making and receiving of improper gifts which may influence business decisions. Employees must comply at all times with all applicable policies, procedures, laws and regulations related to the use of gifts, entertainment and travel.

**The sole exception to such prohibition excludes the provision of the following gifts:**

**a) Giving and receiving of corporate gifts to and from Business Associates, must fulfill the following conditions:**

- are limited, customary and lawful under the circumstances;
- do not have or are perceived to have (by either the giver or receiver) any effect on actions or decisions;
- are given or received with no expectation of any specific favour or improper advantages from the intended recipients;
- will not cause the independent business judgment of the intended recipients to be affected in any way;
- must not involve any corrupt or criminal intent of any kind; and
- the making of such gift must be performed in an open and transparent manner.

The intention behind the giving or receiving of corporate gifts must always be considered, so as not to create an appearance of bad faith and impropriety and should not be misunderstood by others to constitute Gratification. No Directors, Employees or Business Associates will suffer demotion, penalty, blacklisting or other adverse consequences for refusing to pay or receive bribes or participate in other illicit behavior.

b) Promotional gifts such as t-shirts, pens, trade show bags and all other ornaments that Employees obtain, as members of the public, at events such as conferences, training events, seminars, and trade shows that are offered equally to all members of the public attending the event.

c) Festive cards, thank you notes, certificates, or other written forms of thanks and recognition.

d) Exchange of gifts at the company to company level.

### **2.6.2 Entertainment**

Entertainment, as with gifts, when provided excessively and is disproportionate to the context of the business activities, can compromise an employee's ability to make objective business decisions in the best interest of the Hospital.

Therefore all Directors and Employees must not:

- Solicit any form of entertainment from Business Associates directly or indirectly.
- Offer entertainment that are indecent or immoral, which may adversely affect the reputation of the Hospital.

However, Directors and Employees may accept invitations to social events or entertainment within reason according to the scope of work provided on condition that these are not:

- Elaborate, expensive, excessive, lavish affairs;
- becomes a periodic feature that may in any way influence business decisions or gives rise to risks of perceived improper advantage to Business Associates which provide such entertainment;
- Indecent, sexually oriented or that otherwise might put ourselves in a position of conflict or adversely affect the Hospital's reputation.

To protect us from any allegations of impropriety, where possible, we will disclose such invitation or attendance through the prescribed Gifts, Entertainment and Hospitality form.

### **2.6.3 Hospitality**

Providing hospitality

- Although hospitality is recognised as a legitimate way to network and build goodwill in business relationships, there exists a fine line between what is considered to be legitimate against illegitimate forms of corporate hospitality, with the question being whether there is any intention to influence or be perceived to influence the improper outcome of a business decision by providing such hospitality.
- Hospitality is illegitimate under the following circumstances:
  - a. if it is provided with the intention of inducing the recipient to perform a function improperly; or
  - b. if there is knowledge that acceptance of such hospitality would in itself be improper performance.
- Any hospitality provided must be:
  - a. transparent, in that all hospitality is reported and written approval is obtained, all records of which are properly kept;
  - b. proportionate, being that hospitality commensurate with the recipient's professional capacity and must not be excessive;
  - c. reasonable, in that the corporate hospitality is not lavish; and
  - d. bona fide, where the intention to offer and/or provide such hospitality is done without any improper or illegal intentions.

**Receiving hospitality**

- As a general principle, the Hospital strictly prohibits Directors and Employees from soliciting corporate hospitality nor are they allowed to accept hospitality that is excessive, inappropriate, illegal or given in response to, in anticipation of, or to influence a business decision favourable to the Hospital.
- Notwithstanding the above, the Hospital recognises that the occasional acceptance of an appropriate level of hospitality given in the normal course of business is usually a legitimate factor to building good business relationships. However, it is important for employees to exercise proper care and judgment before accepting such hospitality, to safeguard the Hospital's reputation and protect employees from allegations of impropriety or undue influence.
- Following the above, Directors and Employees may accept accommodation, meals and transportation provided by Business Associates within the host country of such Business Associates for business trips and where prior approval has been obtained from Secretary General / Tung Shin Council. The cost of travelling to the host country of such Business Associates must be borne by the Hospital.
- Such acceptance of hospitality by Directors and Employees must not be elaborate, expensive, excessive, lavish or becomes a periodic feature that may in any way influence business decisions.

## **2.7 Donation and Sponsorship Policy**

While Donations and Sponsorships are permitted, the Hospital strictly prohibits the giving and receiving of Donation and Sponsorship which may influence business decisions or gives rise to risks of perceived improper advantage to the Hospital.

Directors and Employees must ensure that all Donation and Sponsorship by the Hospital are made through legal and proper/prescribed channels, with particular care by way of proper due diligence or background checks made to ensure that the charities or sponsored organisations which benefit from such donations and sponsorship are licensed and legitimate organisations which are legally permitted to accept public donations and sponsorships.

Directors and Employees must at all times avoid situations where conflict of interest may arise when making any Donation and Sponsorship, especially those in favour of charities or sponsored organisations that may have links to government officials and/or their families, to avoid any possibility of improperly influencing any decisions by such government officials in favour of the Hospital.

Directors and Employees must obtain approval(s) prior to making any Donation and Sponsorship on behalf of the Hospital, with approved Donation and Sponsorship recorded accurately and made transparently.

For the avoidance of doubt, educational scholarships are exempted from the Policy, which is and will continue to be governed by criteria and rules approved and established by the Hospital.

In addition, any donation or sponsorship received or given out must be accurately captured and reflected in our financial accounts to avoid giving any impression of wrongfulness or improper conduct.

## 2.8 Regulation on Political Contributions

Corporate political contributions are strictly regulated and must be approved by the Secretary General / Tung Shin Council. All political contributions will be properly recorded.

For the purpose of clarity, political contributions or expenditures include, but not limited to:

- Paying for advertisements and other political campaign expenses.
- Buying tables for fundraising dinners organised by a political party.
- Loaning Employees to support political events during working hours.

We must ensure that:

- Subject to prior written approval of the Secretary General / Tung Shin Council, we will not use the Hospital's funds or resources, either directly or indirectly, to help fund political campaigns, political parties, political candidates or anyone associated with them. This includes making political payment under the guise of charitable donation on behalf of the Hospital.
- Any contributions towards, and in support of, political parties must be made personally and give no impression of being connected to the Hospital.
- Any personal political support or contributions do not affect our performance or objective at work.

## 2.9 Providing False or Misleading Information Guidelines

Providing false or misleading information does come under the purview of Malaysia's Anti-Corruption Commission Act. If the authorities are able to establish that:

- a. a person gave information to another person, and
- b. the person does know that the information is:
  - i. false or misleading, or
  - ii. omits to provide material details resulting in the information/message given being misleading

then a breach of Malaysia's anti-corruption law has occurred. The recipient of the information could include any public authority or official or any person who is exercising any power, authority or enforcement of any laws (state or federal). It also covers situations where the information shared is done so in connection with any compliance with any regulation or law.

In addition to the law, our Hospital also adopts a zero tolerance attitude towards information provided with the intention to mislead, conceal or omit the truth or facts. Providing misleading information or attempting to conceal material information by omitting pertinent details are major misconducts as per our Code of Business Conduct & Ethics. These actions impugn on an employee's integrity, a key corporate value of our organisation.

## 2.10 Relationship With Business Associates Policy

In safeguarding our relationships with third parties, the following strict standard operating guidelines will apply:

- a) **All Business Associates are required to comply with this Policy.**

- b) All Business Associates are required to contractually agree to refrain from all acts of Bribery and Corruption at all times while they remain a Business Associate.
- c) Due diligence should as far as possible be carried out on prospective Business Associates, to ensure that such prospective Business Associates are not likely to commit acts of Bribery and Corruption in the course of its association with the Hospital.
- d) The extent of such due diligence carried upon such prospective Business Associates should be based on a bribery and corruption risk assessment, and may include a search through relevant databases, checking for relationships with public officials, self-declarations and documenting the reasons for choosing one particular Business Associate over another. The results of such due diligence process must be documented and retained for not less than six years.
- e) Business Associates shall not -
  - object to anti-Bribery and Corruption representations and warranties in commercial agreements and contracts with the Hospital;
  - seek or insist on convoluted payment arrangements, such as payments to a third party, accounts in foreign countries or make requests for excessive upfront payments for expenses or other fees; or
  - request or require that its/his/her identity be withheld.
- f) The Hospital shall include clauses in all contracts with Business Associates to enable the Hospital to terminate such contracts with Business Associates in the event it is proven that a Business Associate has engaged in an act of Bribery and Corruption.

### **2.11 Conflict of Interest**

Conflict of interest arise where there is personal interest that may potentially affect or interfere with objectivity in the performance of duties or exercising judgment on behalf of the Hospital. Directors and Employees must without exception avoid all circumstances in which personal interest may conflict with their professional duties, obligations and responsibilities. Directors and Employees must not use their position, official working hours, company resources and assets, or information available to them for personal gain or to the detriment of the Hospital.

In the event of actual or potential conflict of interest, the provisions in Section 3.4 in the Employee Handbook shall apply.

### **2.12 Facilitation Payments Guidelines**

The Hospital strictly disallows and prohibits Facilitation Payments of any kind.

Facilitation payments includes payments made to expedite approvals or secure permits and licenses from local authorities. These payments are illegal payments and therefore criminal. As such, Employees are required to notify their Head of Department / Division when encountered with any requests for Facilitation Payments, with such Head of Department/Division required to inform the Chief Operating Officer / Administrator of such requests for facilitation payments.

### **2.13 Protection and reporting violations**

Tung Shin Hospital practises an open-door policy and encourages all employees to raise concerns about any issue or suspicion of malpractice at the earliest stage. Any of the following persons can make a disclosure through the confidential Whistleblower channels.

- a) stakeholders of the Hospital, including employees of Tung Shin Hospital;
- b) people performing work or services for the Hospital, including consultants, contractors and service providers; and
- c) members of the public who are natural persons, not being incorporated or unincorporated bodies.

The Hospital will ensure that all cases of suspected bribery are dealt with consistently and whether or not an investigation shows bribery exists, there will be no retaliation against or adverse consequences for the person reporting the possible case of bribery in good faith. Further, no employee will suffer any retaliation or adverse consequences for refusing to pay or accept a bribe.

A summary of reports received, investigation results, and subsequent actions will be reported by the Ethics and Integrity Committee to Tung Shin Council.

### **2.14 Consequences of breaches**

Any Director or Employee who breaches this Policy shall be subject to disciplinary proceedings, and expressly agrees that the Hospital reserves its right to terminate such Director's appointment / Employee's employment with the Hospital in the event such Director or Employee is found to have committed an act of breach of this Policy.

In addition, legal proceedings may be initiated against a Director or Employee in the event the Hospital's interests, reputations or standing have been affected as a result of such Employee's non-compliance with the Policy.

Where reports are lodged against a Director or Employee or former Director or former Employee who has been found to have committed an act of breach of this Policy, the Hospital shall provide full cooperation to enforcement authorities to facilitate further action by such enforcement authorities against such Director or Employee or former Director or former Employee.

Non-compliance by Business Associates will result in penalties, including termination of contract and blacklisting, without prejudice to the right to initiate legal proceedings against them where the Hospital's interests, reputations or standing have been affected by an act of breach of the Policy by Business Associates.

### **2.15 Annual declaration of compliance**

All Employees of the Hospital shall complete and submit the Annual Declaration of Code of Business Conduct & Ethical Compliance to the Human Resources Department, who will then escalate to the Ethics and Integrity Committee for any non compliance reported. Disciplinary action may be instituted against any person who fails to submit the declaration as required.

## **2.16 Training**

The Hospital conducts awareness programmes for all employees to introduce and refresh awareness of the Policy, and to continuously promulgate ethical conduct and integrity.

Training shall be provided on a regular basis, in accordance with the level of bribery and corruption risk related to the position.

Human Resources shall maintain records to identify employees who have received training, and produce, communicate and update training schedules in relation to the Policy.