REDEEMERS HEALTH VILLAGE

Human Resources Department

ANTI-CORRUPTION & ANTI-BRIBERY POLICY

Policy Code: HR-POL-030

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Date Approved:	—		

Relevant Standards

- Corrupt Practices and Other Related Offences Act 2000 (Nigeria)
- Economic and Financial Crimes Commission (EFCC) Act 2004
- Independent Corrupt Practices and Other Related Offences Commission (ICPC) Act
- Labour Act of Nigeria (Cap L1 LFN 2004)
- RHV Conflict of Interest Policy (HR-POL-004)
- RHV Whistleblowing Policy (HR-POL-026)
- UN Convention Against Corruption (UNCAC) — ratified by Nigeria

Amendment History

Issue	Status	Date	Reason for Change	Authorised
1	Draft	April 28, 2026	New Policy — Board Submission	CHRO
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1. Message from the Chief Executive Officer

Redeemers Health Village was founded on Christian values of integrity, honesty, and service. Corruption and bribery in any form are incompatible with who we are. They harm our patients, they undermine our institution, and they are illegal. This policy makes our position clear and unambiguous: zero tolerance for corruption or bribery by anyone, toward anyone, in any form, at any level of our organisation. I ask every member of our team to uphold this commitment as a personal and professional obligation.

2. Purpose

This policy establishes RHV's framework for preventing, detecting, and responding to corruption and bribery in all its forms. It exists alongside and is distinct from our Conflict of Interest Policy, which governs perceived conflicts arising from personal relationships and interests. This policy specifically addresses the active solicitation, offering, paying, or receiving of bribes and corrupt benefits in connection with RHV's operations, procurement, and patient care.

3. Scope

This policy applies without exception to all persons associated with RHV, including all employees (full-time, part-time, temporary, locum, and contract), volunteers, students, consultants, contractors, agents, and business partners acting on RHV's behalf. It applies to conduct in Nigeria and, to the extent applicable, internationally. It covers both financial and non-financial forms of bribery and corruption.

4. Definitions

4.1 Bribery

Bribery is the offering, promising, giving, accepting, or soliciting of a financial or other advantage, directly or through a third party with the intent to induce or reward improper conduct, or to gain any business, commercial, personal, or regulatory advantage. Bribery is a criminal offence under Nigerian law and subjects both the individual and RHV to criminal prosecution, fines, and reputational damage.

4.2 Corruption

Corruption is the misuse of entrusted power, position, or authority for private gain. In a healthcare context, this includes but is not limited to manipulating admission decisions, procurement awards, pharmaceutical supply agreements, or referral practices for personal financial benefit.

4.3 Facilitation Payments

Facilitation payments, small, unofficial payments made to government officials or other persons to expedite a routine function or process to which RHV is otherwise entitled are prohibited under this policy, even where such payments may be informally accepted as common practice in certain contexts.

5. Absolute Prohibitions

The following are strictly prohibited for all persons covered by this policy, without exception and regardless of business justification, local custom, or instruction from any superior:

- Offering, promising, or giving a bribe to any person including public officials, regulators, procurement officers, or patients to obtain, retain, or award business, licences, favourable treatment, or any advantage
- Requesting, accepting, or soliciting a bribe or corrupt payment in connection with any aspect of your duties at RHV
- Making or authorising facilitation payments of any kind
- Directing or permitting any third party including agents, contractors, or suppliers to offer or accept a bribe on RHV's behalf

- Using personal funds or RHV resources to make any payment that would violate this policy if made directly
- Falsifying or altering records, invoices, or accounts to conceal a corrupt payment
- Retaliating against any person who reports a concern under this policy

6. Gifts, Hospitality, and Entertainment

6.1 Receiving Gifts and Hospitality

Employees must not solicit gifts or hospitality from any third party. Modest, unsolicited gifts of a ceremonial or token nature (e.g., a small food gift during a festive period) from a vendor or business partner may be accepted where: the value does not exceed ₦20,000; acceptance does not create any sense of obligation; and it is declared to HR. Any gift above ₦20,000, any gift of cash or cash equivalent (including vouchers or gift cards), and any gift from a vendor during an active procurement process must be declined and reported to HR within 24 hours, regardless of value.

6.2 Giving Gifts and Hospitality

Employees may offer modest and appropriate hospitality (e.g., a business meal, a branded promotional item) to external parties in connection with legitimate RHV business, provided: the expenditure is reasonable, proportionate, and in accordance with the RHV Finance Policy; it is pre-approved by the relevant Head of Department; it is accurately recorded in RHV's books; and it is not made with any intent to improperly influence a decision.

6.3 Patient Gifts

Gifts or payments from patients or their families even those offered out of gratitude create a particularly sensitive conflict in a healthcare setting. Staff should politely decline any gift of value from a patient or family member. Small, perishable items (e.g., food brought to a ward) may be accepted and shared communally. Any gift of cash, significant value, or that could conceivably affect clinical decision-making must be declined and reported to HR.

7. Procurement and Supply Chain

Procurement decisions present an elevated corruption risk. The following controls apply to all procurement activities at RHV:

- All procurement above defined thresholds must follow RHV's approved competitive tendering process.
- Any employee involved in a procurement process must declare and recuse from any decision involving a supplier or contractor in which they or a close associate have a financial or personal interest.
- Suppliers, contractors, and service providers are required to acknowledge and accept RHV's Anti-Corruption and Anti-Bribery standards as a condition of engagement.
- RHV will conduct appropriate due diligence on all significant new suppliers, contractors, and business partners to assess their anti-corruption risk profile.
- No contract may be split artificially to avoid procurement thresholds.

8. Record-Keeping and Financial Controls

Accurate, transparent, and complete financial records are a core element of RHV's anti-corruption framework. All employees who have authority to commit or record financial transactions must ensure:

- All payments are made through official, authorised RHV channels and recorded accurately in the accounts
- No undisclosed or off-book accounts, funds, or transactions exist
- All invoices and payment requests are genuine and relate to services or goods actually received
- No cash payments are made to individuals in lieu of documented, properly approved expenditure

- Any unusual or suspicious financial transaction is reported immediately to the CFO and the CHRO

9. Due Diligence on Third Parties

RHV may be held responsible for corrupt acts committed by persons acting on its behalf. Before engaging any new agent, intermediary, consultant, or significant contractor, HR and Finance will conduct appropriate due diligence proportionate to the risk profile of the engagement, including: verification of the third party's identity and legal standing; inquiry into their reputation for integrity; review of their stated anti-corruption policies and controls; and contractual commitment to RHV's anti-corruption standards.

10. Reporting Suspected Corruption or Bribery

Any employee who suspects, witnesses, or is approached in connection with any form of corruption or bribery, whether involving an RHV employee, a patient, a supplier, a contractor, or any other party must report it immediately. Reports may be made through any of the following channels:

- Directly to the COO, CCO, CFO, CHRO or CEO
- Through the RHV Whistleblowing channel as set out in the Whistleblowing Policy (HR-POL-026)
- Directly to the Board Chair or Chair of the Audit & Governance Committee where senior management is implicated

All reports will be treated confidentially and investigated promptly. Reporters acting in good faith are fully protected from retaliation under HR-POL-026. Where the facts warrant, RHV will refer matters to the EFCC, ICPC, Nigerian Police Force, or other relevant authorities.

11. Consequences of Violation

Any breach of this policy, whether by offering, soliciting, paying, or accepting a bribe or corrupt benefit will be treated as gross misconduct and will result in summary dismissal without notice or payment in lieu, in accordance with the RHV Disciplinary Action Policy (HR-POL-005). RHV will additionally report the matter to the relevant regulatory and law enforcement authorities and will pursue civil and/or criminal legal remedies as appropriate. The fact that a superior instructed an employee to engage in corrupt conduct is not a defence and does not diminish individual liability.

12. Training and Awareness

All employees are required to complete anti-corruption and anti-bribery awareness training as part of their induction at RHV. Refresher training is mandatory annually for all staff and more frequently for those in roles with elevated corruption risk (Procurement, Finance, Executive Management, clinical staff with prescribing authority). Completion of training is recorded in the HR system and forms part of the employee's annual compliance record.

13. Roles and Responsibilities

All Employees

Comply with this policy at all times; report concerns promptly; never allow a fear of commercial or operational consequences to justify a breach of this policy.

Managers and Heads of Department

Model ethical conduct; create a team culture where concerns can be raised without fear; escalate any suspected breach immediately.

Finance Department

Maintain rigorous financial controls; ensure all transactions are properly documented and authorised; flag any unusual or suspicious financial activity.

CHRO

Administer this policy; maintain the gifts register; coordinate training; investigate alleged breaches; report to the CEO and Board.

CEO

Champion integrity culture; receive reports of suspected corruption; ensure appropriate response including regulatory referral where warranted.

Board of Directors

Receive annual compliance reporting; ensure robust anti-corruption governance; hold management accountable for the effective operation of this policy.

14. Monitoring and Review

The CHRO maintains a gifts, hospitality, and disclosure register, which is reviewed quarterly by the CEO and annually by the Board's Audit & Governance Committee. This policy is reviewed annually and updated to reflect changes in Nigerian law, healthcare sector risk, or operational experience.