

Anti-Corruption Policy

1. Purpose

Virtumed is committed to conducting business with integrity, transparency, and in full compliance with anti-corruptions laws. This policy outlines our zero-tolerance approach to bribery, corruption and unethical conduct in all areas of operation.

2. Prohibition of Corruption and Bribery

Employees/contractors, and business partners must not offer, give, solicit, or receive any form of bribe or improper payment, whether directly or indirectly, to or from any individual, organization, or government official.

3. Cash-Free

Virtumed maintains a strict cash-free policy. Under no circumstances shall employees, contractors, suppliers, or any other stakeholders provide or accept cash in any transaction involving.

We do not encourage, condone, or tolerate the use of cash in any business dealings and consider any breach of this policy a serious violation, subject to disciplinary action and potential legal consequences.

4. Gifts and Hospitality

- Gifts, entertainment, or hospitality must never be used to influence business decisions. Any such items must be modest, symbolic, and professional.
- Gifts must be handmade or designed by our team branded with Virtumed's identity.
- Gifts are never to be tied to sales, performance or favour seeking.

5. Legal Compliance

- This Policy aligns to the Prevention and Combating of Corrupt Activities Act (PRECCA) which defines corruption as giving or accepting any gratification to include someone to act or not act in a particular manner.
- Non-compliance will result in immediate termination and full cooperation with authorities.

6. Reporting Concerns

- Any employee/contractor or partner may report corruption suspicions anonymously using our internal grievance mechanism.
- All reports will be taken seriously and handled sensitively.

7. Investigations

- All reports are handled by the CEO or CFO promptly, fairly and impartially.
- Anonymous submissions are reviewed within five (5) working days.
- If substantiated, a formal review will be conducted, and disciplinary or legal action will be taken.

8. Zero Retaliation Guarantee

- Anyone reporting in good faith will be protected from reprisal, demotion, or ostracisation.
- Disciplinary action will be taken against any form of intimidation, harassment, or retaliation.

9. Transparency and Record-Keeping

- A log of all complaints (excluding personal identifiers) will be reviewed quarterly by the executive team.
- All financial transactions and business dealings must be recorded clearly and honestly.