

## **TLS ANTI-BRIBERY AND CORRUPTION POLICY**

TLS recognises that bribery and corruption have an adverse effect on business and communities in which they operate in. Failure to identify and act upon bribery or corruption can break laws and basic human freedoms, distorting free trade and competition. Our definitions of bribery and corruption are below;

- **Bribery** – A Bribe, broadly speaking is an inducement or reward offered, requested, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. This can be in the context of giving or receiving. An offence is committed when the bribe is coupled with an intention of inducing, a reward for or in anticipation of a person to improperly perform their function **or** if the request, agreement to accept or acceptance of the bribe itself constitutes or is believed to constitute the improper performance of an activity. In addition offering a bribe to a foreign public official to induce that public official to obtain or retain business or an advantage in the conduct of business (and that is not permitted by local law, will also be an offence.
- **Corruption** - Giving or obtaining advantage through means which are illegitimate, immoral, and/or inconsistent with one's duty or the rights of others.

### **Company Statement**

The board of TLS are committed to implementing and enforcing effective systems to prevent monitor and eliminate bribery and corruption in accordance with the Bribery Act 2010. We will immediately and thoroughly investigate any allegation of bribery or corruption, and will take the strongest action. Breaches of this policy may be considered to be gross misconduct and lead to dismissal.

### **Laws and Regulations**

TLS is committed to applying high standards of honesty and integrity across our business. Our Bribery and Corruption Policy mirrors the statutory requirements under the Bribery Act 2010.

### **Policy and Practices**

The TLS Bribery and Corruption Policy applies to all employees, agency workers, consultants and contractors, irrespective of their level or functions they perform within the Company.

TLS expects our business partners, suppliers and contractors to act with utmost integrity and without actions or thoughts involving bribery and/or corruption.

### **Responsibilities**

All employees, consultants, contractors and agency workers; and any individual working directly for the business (including agents) are required and agree to operate within the following guidelines:

- To always act with honesty and integrity and support TLS's policy relating to bribery and corruption.
- Not to offer or make any bribe, outlandish or unauthorised payment or incentive of any kind to anyone.
- Not to solicit business by offering any bribe, unorthodox or unofficial payment to customers or potential customers.
- Not to accept any kind of bribe, unorthodox or unusual payment or inducement that would not be authorised by TLS in the ordinary course of business.

## **TLS ANTI-BRIBERY AND CORRUPTION POLICY**

- To refuse any bribe or outlandish payment and to do so in a manner that is not open to misunderstanding or giving rise to false expectation; and to report any such offers.
- Not to make facilitation payments. These are payments used by businesses or individuals to secure or accelerate a service or product. The Company will not tolerate or overlook such payments being made.
- To report any breaches of the policy, if you suspect Bribery or Corruption is occurring or has occurred previously or if you are unclear on procedures or your responsibilities.

### **What to do if you become aware or suspect there is breach of the policy**

If you become aware of Bribery or Corruption occurring you should report this to a member of staff without delay. If you know or suspect they will not be able to act on the information impartially you should contact the Managing Director.

The information will then be collated and assessed.

This policy should be read alongside our business ethics policy and your individual contract of employment or terms of engagement.

Any breach of policy by any employee, worker or agent will be considered as grounds for disciplinary action, and may be considered to be gross misconduct. A breach by a contractor or consultant will be considered grounds to terminate any contract or agreement with that individual or Company.

### **Preventative Measures**

As further preventative measures we have set out the following guidelines:

- Any expenditure by company to third parties in excess of £50.00 relating to gifts or entertainment must be authorised in advance by a Director.
- All gifts and gratuities (of any value) must be declared by employees and employees must not receive any gifts or gratuities at their home address.
- Gifts and gratuities include: physical gifts; entertainment; corporate hospitality; vouchers; free or discounted goods or services; free or discounted use of facilities, property or any other items from suppliers, clients or other third parties.

*JABennett*

Jill Bennett

Managing Director