

POLICY DOCUMENT POL-004

ANTI-BRIBERY AND CORRUPTION



1.0 STATEMENT OF POLICY

It is **TNG Consulting Engineers Limited's** policy to conduct its business with integrity and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. Our organisation is committed to observing legislative and ethical principles. TNG recognises that bribery and corruption are criminal offences and has an obligation to comply with the Bribery Act 2010.

The Company will not tolerate the following offences by TNG Employees, or by other third parties, during any stage of providing its Consultancy Services:

- **Bribing another Person** - giving financial or other advantage with the intention of inducing another person (including government intermediaries) to perform a service or activity improperly, or, rewarding that person for doing so.
- **Accepting a Bribe** - receiving financial or other advantage with the intention of being induced to perform a service, or activity improperly or being rewarded for doing so.
- **Bribing a Foreign Public Official** - giving financial or other advantage with the intention of inducing a Foreign Public Official to perform a service or activity improperly or rewarding a Foreign Public Official for doing so.
- **Failing to Prevent Bribery and/or Corruption** - a commercial organisation will be liable to prosecution if a person associated with it bribes another person intending to obtain or retain business or an advantage in the conduct of business for that organisation.

2.0 HOSPITALITY AND GIFTS

A Director must be notified of any hospitality or gift received from a Customer, Client, Supplier or other third party and it must be declined if the Director deems it to be inappropriate to accept. Any hospitality or corporate gift offered by a TNG Employee to a Customer, Client, Supplier or other third party must be given prior authorisation by a member of the Board of Directors.

Examples of exchanges, which are **never permissible**, include:

- A 'quid pro quo' (an exchange of one thing for another either with the intention of inducing someone to act improperly or as a reward for having acted improperly);
- Gifts in the form of cash or cash equivalent;
- Entertainment of a sexual or similarly inappropriate nature.

Examples of exchanges that are **usually acceptable** include:

- Modest occasional meals with someone with whom we do business;
- Occasional attendance at ordinary sports, theatre and other cultural events;
- Gifts of nominal value; such as pens or small promotional items.

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3.0 CHARITABLE DONATIONS

The Board of Directors elects a charity to sponsor and regularly reviews the recipient of its support. The chosen charity shall be a national or local charity that is not directly linked to our Business activities. We may, however, choose to support a charity that is linked to a Client or business colleague, if the work being carried out is beneficial to the local community and/or our Employees and their families; for instance, a health or wellbeing organisation. At no time shall the Company negotiate work if it is dependent on TNG making a financial donation to the charity or any other exchange.

The Company may also make small, occasional charitable donations to local charities, or in support of business colleagues or Clients that participate in fund raising activities. All donations shall be required to be approved by a Director in advance.

4.0 CONFLICTS OF INTEREST

The Company must be notified of any known business or personal relationship that may present a Conflict of Interest for the Company. The Business Development Director will be responsible for monitoring new and existing Business relationships to identify and eliminate any Conflicts of Interest.

5.0 TRAINING

Bribery and Corruption is a mandatory training activity for all Employees. The Director responsible for managing the risk of Bribery and Corruption shall ensure that the training provided is suitable and sufficient and addresses the risks that may be present.

6.0 RISK MANAGEMENT

The Company has adopted the 'six principles', recommended by Government, in its procedures to manage the risk of Bribery and Corruption. These are:

- 1) Our procedures are **proportionate to our Business;**
- 2) We have **top-level commitment** when managing this risk;
- 3) We have carried out a **Risk Assessment;**
- 4) We apply **due diligence** procedures;
- 5) Bribery prevention is embedded into our organisation through **communication** and **training;**
- 6) We **monitor and review** our procedures.

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7.0 RAISING A CONCERN

Everyone has a responsibility to help detect, prevent and report instances not only of bribery, corruption or fraud, but also of any other suspicious activity or wrongdoing. Any suspicious activity or wrongdoing should be raised via the Company Disclosure procedure, or the Complaints procedure, at the earliest possible time.

8.0 DECLARATION

This Policy is fully supported by the Board of Directors. Any breach of this Policy will be regarded as an act of Gross Misconduct by the Company and may result in disciplinary action. We shall ensure that our Employees, Clients and other Business Colleagues are aware of this Policy and understand that they are responsible for observing it.

Signed:  Date: 12-09-2024

Russell Pitman, Managing Director/Business Development Director

This Policy shall be reviewed and resigned annually,