

Anti-corruption and Bribery Policy

Our Aim

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and in implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

What we will do.

The purpose of this policy is to:

set out our responsibilities and of those working for us, in observing and upholding our position on bribery and corruption; and

to provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

In this policy, **third party** means any individual or organisation TCS comes into contact with during the course of our work, and includes actual and potential clients, customers, suppliers, business contacts, agents, and advisers.

Who is covered by the policy?

This policy applies to all TCS individuals working at all levels and grades, including trustees/ directors, senior managers, employees (whether permanent, fixed-term or temporary)

What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Gifts and hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties providing:

- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it complies with local law;
- it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time

What is not acceptable?

It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

Responsibilities

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for TCS or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Any trustee, employee or volunteer who breaches this policy will face disciplinary action, which may result in dismissal or termination of role. We reserve our right to terminate our contractual relationship with other workers and organisations if they breach this policy.

Record-keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts accepted or offered

How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with the TCS Chairman or CEO as appropriate.

Approved May 2020

To Be Reviewed May 2023