



TEC TRAINING (GB) LTD
COMPANY POLICIES MANUAL

ANTI-BRIBERY & CORRUPTION POLICY

REVISION RECORD

Issue:	Date:	Comments:
1	Sept 2014	1st issue
2	Sept 2016	2 nd Issue no significant changes
3	Sept 2017	Annual Review
4	Sept 2018	Following annual review
5	Sept 2019	internal audit
6	Sept 2020	Following annual review – changes in bold
7	Sept 2021	Following annual review – changes in bold

APPROVAL AND AUTHORISATION

Prepared by		Reviewed and signed of by
David Eve HSQE Advisor		Anwar Gorji Managing Director
		



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Introduction

Bribery and corruption is, unfortunately a feature of corporate and public life. Tec Training has a clear policy and we support our employees to make decisions in line with our stated position.

Our corporate conduct is based on our commitment to acting professionally, fairly and with integrity. We do not tolerate any form of bribery or corruption.

Purpose

The purpose of this policy is to set out the responsibilities of Company functions and business units in observing and upholding our position on bribery and corruption. In developing this policy we have made reference to the "*Business Principles for Countering Bribery*" published by Transparency International.

Scope

This policy applies to all Tec Training employees and sub-contractors.

Where we have a minority interest we will champion the application of this policy among our business partners.

Policy

Our company business principles set out our commitment to operate responsibly wherever we work and to engage the social, environmental and ethical impact of our activities in the field that we operate within.

Our first principle, "*Integrity in Corporate Conduct*" states that Tec Training does not engage in bribery or any form of unethical inducement or payment including facilitation payments and kick-backs".

All employees of the company are to avoid any activities that might lead to, or suggest a conflict of interest with the business of the company. Employees must declare and keep a record of hospitality or gifts offered, which will be subject to a managerial review.

We will uphold any laws relevant to countering bribery and corruption in all jurisdictions in which we operate, particularly laws that are directly relevant to our specific business practices. The following national and international laws and conventions underpin this policy:

- Bribery Act 2010
- Bribery Act 2010 Corporate Hospitality, Gifts & Expenses
- Bribery Act 2010 Facilitation Payments

Responsibilities

The Managing Director will establish appropriate responsibilities and procedures within the operating business. If any instance of bribery or corruption is identified, remedial action will be put into place with immediate effect.

Training & Communication

We will communicate this policy and relevant guidance to everyone under our umbrella, through our established internal communications system, in accordance with our



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management system. Managers and employees will receive any relevant training on how to implement this policy in the scope of their employment within the Company.

Policy requirements

The company will ensure -

- A periodic and formal assessment of the risk of bribery within its organisation or that of its associated persons
- Clear, practical and accessible anti-bribery procedures are in place proportionate to the risks identified
- top level commitment to the prevention of bribery
- carry out due diligence on its organisations, subcontractors and agents to identify any corrupt practices
- communicate anti-bribery procedures policies to staff and 'agents'
- monitor and periodically review the policy and procedures particularly if conditions change

Raising Concerns & Seeking Guidance

Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage in total confidence to their immediate manager or supervisor.

Monitoring & Review

Tec Training will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.

Internal Controls & Audit

The company will seek to establish feedback mechanisms in order to maintain accurate records-available for inspection- this will document a fair and proper recording of financial and donative transactions. Internal controls will be subject to regular audits to provide assurance that they are effective un countering bribery and corruption within our industry.

Signed by,

A handwritten signature in black ink, appearing to be 'A. Q.', written over a horizontal line.

Managing Director

Dated 01.09.21