



Bribery and Anti-Corruption Policy

TMC Security Services Ltd

SUMMARY

- TMC Security Service Ltd takes a zero-tolerance approach to bribery and corruption.
- Committing bribery type offences can lead to major fines and up to ten years' imprisonment.
- Corporate hospitality, gifts and kick-back payments can all be considered bribes.
- A breach of this policy will be a serious disciplinary matter and can lead to dismissal.
- If you suspect people at TMC Security Services Ltd are receiving or making bribes, notify your manager or a director immediately.

1. Policy statement

1.1 IT IS OUR POLICY TO CONDUCT ALL OF OUR BUSINESS IN AN HONEST AND ETHICAL MANNER.

TMC SECURITY SERVICES LTD IS COMMITTED TO ACTING PROFESSIONALLY, FAIRLY AND WITH INTEGRITY IN ALL ITS BUSINESS DEALINGS AND RELATIONSHIPS WHEREVER IT OPERATES AND IMPLEMENTING AND ENFORCING EFFECTIVE SYSTEMS TO COUNTER BRIBERY.

1.2 TMC SECURITY SERVICES LTD WILL UPHOLD ALL LAWS RELEVANT TO COUNTERING BRIBERY AND CORRUPTION, IN OPERATIONS IN THE JURISDICTION IN WHICH IT OPERATES. HOWEVER, IT REMAINS BOUND BY THE LAWS OF THE UK, INCLUDING THE BRIBERY ACT 2010, IN RESPECT OF ITS CONDUCT BOTH AT HOME AND ABROAD.

1.3 THE PURPOSE OF THIS POLICY IS TO:

1.3.1 SET OUT TMC SECURITY SERVICES LTD RESPONSIBILITIES, AND THE RESPONSIBILITIES OF THOSE WORKING FOR US, IN OBSERVING AND UPHOLDING TMC SECURITY SERVICES LTD.'S POSITION ON BRIBERY AND CORRUPTION; AND

1.3.2 PROVIDE INFORMATION AND GUIDANCE TO THOSE WORKING FOR TMC SECURITY SERVICES LTD ON HOW TO RECOGNISE AND DEAL WITH BRIBERY AND CORRUPTION ISSUES.



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1.4 BRIBERY AND CORRUPTION ARE PUNISHABLE FOR INDIVIDUALS BY UP TO TEN YEARS' IMPRISONMENT AND IF TMC SECURITY SERVICES LTD IS FOUND TO HAVE TAKEN PART IN CORRUPTION IT COULD FACE AN UNLIMITED FINE, BE EXCLUDED FROM TENDERING FOR PUBLIC CONTRACTS AND FACE DAMAGE TO ITS REPUTATION. TMC SECURITY SERVICES LTD THEREFORE TAKES ITS LEGAL RESPONSIBILITIES VERY SERIOUSLY.

1.5 IN THIS POLICY, THIRD PARTY MEANS ANY INDIVIDUAL OR ORGANISATION YOU COME INTO CONTACT WITH DURING THE COURSE OF YOUR WORK FOR TMC SECURITY SERVICES LTD, AND INCLUDES ACTUAL AND POTENTIAL CLIENTS, CUSTOMERS, SUPPLIERS, DISTRIBUTORS, BUSINESS CONTACTS, AGENTS, ADVISERS, AND GOVERNMENT AND PUBLIC BODIES, INCLUDING THEIR ADVISORS, REPRESENTATIVES AND OFFICIALS, POLITICIANS AND POLITICAL PARTIES.

2. WHO IS COVERED BY THE POLICY?

2.1 This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with TMC Security Services Ltd, or any of its subsidiaries or its employees, wherever located (collectively referred to as workers in this policy).

3. WHAT IS BRIBERY?

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

4. GIFTS AND HOSPITALITY

4.1 THIS POLICY DOES NOT PROHIBIT NORMAL AND APPROPRIATE HOSPITALITY (GIVEN AND RECEIVED) TO OR FROM THIRD PARTIES.

4.2 THE GIVING OR RECEIVING OF GIFTS IS NOT PROHIBITED, IF THE FOLLOWING REQUIREMENTS ARE MET:

4.2.1 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.

4.2.2 IT COMPLIES WITH LOCAL LAW.

4.2.3 IT IS GIVEN IN TMC SECURITY SERVICES LTD NAME, NOT IN YOUR NAME.

4.2.4 IT DOES NOT INCLUDE CASH OR A CASH EQUIVALENT (SUCH AS GIFT CERTIFICATES OR VOUCHERS).



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4.2.5 IT IS APPROPRIATE IN THE CIRCUMSTANCES. FOR EXAMPLE, IN THE UK IT IS CUSTOMARY FOR SMALL GIFTS TO BE GIVEN AT CHRISTMAS TIME.

4.2.6 TAKING INTO ACCOUNT THE REASON FOR THE GIFT, IT IS OF AN APPROPRIATE TYPE AND VALUE AND GIVEN AT AN APPROPRIATE TIME.

4.2.7 IT IS GIVEN OPENLY, NOT SECRETLY; AND

4.2.8 GIFTS SHOULD NOT BE OFFERED TO, OR ACCEPTED FROM, GOVERNMENT OFFICIALS OR REPRESENTATIVES, OR POLITICIANS OR POLITICAL PARTIES, WITHOUT THE PRIOR APPROVAL OF YOUR MANAGER.

4.3 TMC SECURITY SERVICES LTD APPRECIATES THAT THE PRACTICE OF GIVING BUSINESS GIFTS VARIES BETWEEN COUNTRIES AND REGIONS AND WHAT MAY BE NORMAL AND ACCEPTABLE IN ONE REGION MAY NOT BE IN ANOTHER. THE TEST TO BE APPLIED IS WHETHER IN ALL THE CIRCUMSTANCES THE GIFT OR HOSPITALITY IS REASONABLE AND JUSTIFIABLE. THE INTENTION BEHIND THE GIFT SHOULD ALWAYS BE CONSIDERED.

5. WHAT IS NOT ACCEPTABLE?

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

5.1.1 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.

5.1.2 GIVE, PROMISE TO GIVE, OR OFFER, A PAYMENT, GIFT OR HOSPITALITY TO A GOVERNMENT OFFICIAL, AGENT OR REPRESENTATIVE TO "FACILITATE" OR EXPEDITE A ROUTINE PROCEDURE.

5.1.3 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.

5.1.4 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 TMC SECURITY SERVICES LTD IN RETURN.

5.1.5 THREATEN OR RETALIATE AGAINST ANOTHER WORKER WHO HAS REFUSED TO COMMIT A BRIBERY OFFENCE OR WHO HAS RAISED CONCERNS UNDER THIS POLICY OR

5.1.6 ENGAGE IN ANY ACTIVITY THAT MIGHT LEAD TO A BREACH OF THIS POLICY.

6. FACILITATION PAYMENTS AND KICKBACKS

6.1 TMC SECURITY SERVICES LTD DOES NOT MAKE, AND WILL NOT ACCEPT, FACILITATION PAYMENTS OR "KICKBACKS" OF ANY KIND. FACILITATION PAYMENTS ARE TYPICALLY SMALL, UNOFFICIAL PAYMENTS MADE TO SECURE OR EXPEDITE A ROUTINE GOVERNMENT ACTION BY A GOVERNMENT OFFICIAL. THEY ARE NOT COMMONLY PAID IN THE UK BUT ARE COMMON IN SOME OTHER JURISDICTIONS.



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6.2 IF YOU ARE ASKED TO MAKE A PAYMENT ON TMC SECURITY SERVICES LTD BEHALF, YOU SHOULD ALWAYS BE MINDFUL OF WHAT THE PAYMENT IS FOR AND WHETHER THE AMOUNT REQUESTED IS PROPORTIONATE TO THE GOODS OR SERVICES PROVIDED. YOU SHOULD ALWAYS ASK FOR A RECEIPT WHICH DETAILS THE REASON FOR THE PAYMENT. IF YOU HAVE ANY SUSPICIONS, CONCERNS OR QUERIES REGARDING A PAYMENT, YOU SHOULD RAISE THESE WITH YOUR MANAGER.

6.3 KICKBACKS ARE TYPICALLY PAYMENTS MADE IN RETURN FOR A BUSINESS FAVOUR OR ADVANTAGE. ALL WORKERS MUST AVOID ANY ACTIVITY THAT MIGHT LEAD TO, OR SUGGEST, THAT A FACILITATION PAYMENT OR KICKBACK WILL BE MADE OR ACCEPTED BY US.

7. DONATIONS

7.1 TMC Security Services Ltd does not make contributions to political parties. TMC Security Services Ltd only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of your manager.

8. YOUR RESPONSIBILITIES

8.1 YOU MUST ENSURE THAT YOU READ, UNDERSTAND AND COMPLY WITH THIS POLICY.

8.2 THE PREVENTION, DETECTION AND REPORTING OF BRIBERY AND OTHER FORMS OF CORRUPTION ARE THE RESPONSIBILITY OF ALL THOSE WORKING FOR US OR UNDER OUR CONTROL. ALL WORKERS ARE REQUIRED TO AVOID ANY ACTIVITY THAT MIGHT LEAD TO, OR SUGGEST, A BREACH OF THIS POLICY.

8.3 YOU MUST NOTIFY YOUR MANAGER AS SOON AS POSSIBLE IF YOU BELIEVE OR SUSPECT THAT A CONFLICT WITH THIS POLICY HAS OCCURRED, OR MAY OCCUR IN THE FUTURE. FOR EXAMPLE, IF A CLIENT OR POTENTIAL CLIENT OFFERS YOU SOMETHING TO GAIN A BUSINESS ADVANTAGE WITH BETS OR INDICATES TO YOU THAT A GIFT OR PAYMENT IS REQUIRED TO SECURE THEIR BUSINESS.

8.4 ANY EMPLOYEE WHO BREACHES THIS POLICY WILL FACE DISCIPLINARY ACTION, WHICH COULD RESULT IN DISMISSAL FOR GROSS MISCONDUCT. TMC SECURITY SERVICES LTD RESERVES ITS RIGHT TO TERMINATE ITS CONTRACTUAL RELATIONSHIP WITH OTHER WORKERS IF THEY BREACH THIS POLICY.

8.5 YOU MUST ENSURE ALL EXPENSES CLAIMS RELATING TO HOSPITALITY, GIFTS OR EXPENSES INCURRED TO THIRD PARTIES ARE SUBMITTED IN ACCORDANCE WITH OUR EXPENSES POLICY AND SPECIFICALLY RECORD THE REASON FOR THE EXPENDITURE.

8.6 ALL ACCOUNTS, INVOICES, MEMORANDA AND OTHER DOCUMENTS AND RECORDS RELATING TO DEALINGS WITH THIRD PARTIES, SUCH AS CLIENTS, SUPPLIERS AND BUSINESS CONTACTS, SHOULD BE PREPARED AND MAINTAINED WITH STRICT ACCURACY AND COMPLETENESS. NO ACCOUNTS MUST BE KEPT "OFF-BOOK" TO FACILITATE OR CONCEAL IMPROPER PAYMENTS.



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9. HOW TO RAISE A CONCERN

9.1 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 your manager or with a director.

10. WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION

10.1 It is important that you tell your manager as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

11. PROTECTION

11.1 WORKERS WHO REFUSE TO ACCEPT OR OFFER A BRIBE, OR THOSE WHO RAISE CONCERNS OR REPORT ANOTHER'S WRONGDOING, ARE SOMETIMES WORRIED ABOUT POSSIBLE REPERCUSSIONS.

TMC SECURITY SERVICES LTD AIMS TO ENCOURAGE OPENNESS AND WILL SUPPORT ANYONE WHO RAISES GENUINE CONCERNS IN GOOD FAITH UNDER THIS POLICY, EVEN IF THEY TURN OUT TO BE MISTAKEN.

11.2 TMC SECURITY SERVICES LTD IS COMMITTED TO ENSURING NO ONE SUFFERS ANY DETRIMENTAL TREATMENT AS A RESULT OF REFUSING TO TAKE PART IN BRIBERY OR CORRUPTION, OR BECAUSE OF REPORTING IN GOOD FAITH THEIR SUSPICION THAT AN ACTUAL OR POTENTIAL BRIBERY OR OTHER CORRUPTION OFFENCE HAS TAKEN PLACE, OR MAY TAKE PLACE IN THE FUTURE. DETRIMENTAL TREATMENT INCLUDES DISMISSAL, DISCIPLINARY ACTION,

THREATS OR OTHER UNFAVOURABLE TREATMENT CONNECTED WITH RAISING A CONCERN. IF YOU BELIEVE THAT YOU HAVE SUFFERED ANY SUCH TREATMENT, YOU SHOULD INFORM YOUR MANAGER IMMEDIATELY. IF THE MATTER IS NOT REMEDIED, AND YOU ARE AN EMPLOYEE, YOU SHOULD RAISE IT FORMALLY USING THE COMPANY'S GRIEVANCE PROCEDURE.

12. COMMUNICATION

12.1 TMC SECURITY SERVICES LTD ZERO-TOLERANCE APPROACH TO BRIBERY AND CORRUPTION MUST BE COMMUNICATED TO ALL SUPPLIERS, CONTRACTORS AND BUSINESS PARTNERS AT THE OUTSET OF OUR BUSINESS RELATIONSHIP WITH THEM AND AS APPROPRIATE THEREAFTER.

13. WHO IS RESPONSIBLE FOR THE POLICY?

13.1 THE BOARD OF DIRECTORS HAS OVERALL RESPONSIBILITY FOR ENSURING THIS POLICY COMPLIES WITH TMC SECURITY SERVICES LTD LEGAL AND ETHICAL OBLIGATIONS, AND THAT ALL THOSE UNDER OUR CONTROL COMPLY WITH IT.



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13.2 MANAGEMENT AT ALL LEVELS HAVE DAY TO DAY RESPONSIBILITY FOR IMPLEMENTING THIS POLICY AND ARE RESPONSIBLE FOR ENSURING THOSE REPORTING TO THEM ARE MADE AWARE OF AND UNDERSTAND THIS POLICY AND ARE GIVEN ADEQUATE AND REGULAR TRAINING ON IT.

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