

Anti-Corruption and Anti-Bribery Policy

Policy Statement

Termination Technology Ltd conducts all of its business in an honest and ethical manner and takes a zero-tolerance approach to bribery and corruption. It is committed to acting professionally, fairly and with integrity in all its business dealings and relationships.

If Termination Technology 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. It therefore takes its legal responsibilities very seriously.

Termination Technology Ltd will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it operates and remains bound by the laws of the UK, including the Bribery Act 2010, in respect of its conduct both at home and abroad.

This policy applies directly to all individuals working with Termination Technology Ltd whether as employees, contractors, business partners or suppliers. All will be required to comply with the provisions of this policy.

The purpose of the policy is to set out responsibilities for the Company and of those working for it, in observing and upholding its position on bribery and corruption; and to provide information and guidance to those working for Termination Technology Ltd on how to recognise and deal with bribery and corruption issues.

In this policy, "third party" means any individual or organisation employees come into contact with during the course of an employees work with Termination Technology Ltd

Bribery Definition

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 that all of the following requirements are met:

It is not offered 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. And;

It complies with local law.

It is given in Termination Technology Ltds' name, not in an individual employee's name.

It does not include cash, or a cash equivalent (such as gift certificates or vouchers).

It is appropriate in the circumstances. For example, it is given as a ceremonial gift at a festival or at other special times (e.g. Christmas or Easter).

If the gift is of an appropriate type and value, and given at an appropriate time.

It is given openly, not secretly, and it is not a gift offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of the Director or nominated Manager within Termination Technology Ltd.

Termination Technology 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 applicable test is whether, in all circumstances, the gift or hospitality is reasonable and justifiable.

The intention behind the gift should always be considered.

Unacceptable Practice

It is not acceptable for employees (or someone on an employees behalf) to:

Accept gifts from a third party to the value of more than £50 without the prior written approval of the Director or nominated Manager. Or;

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; or 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; or to accept payment from a third party that employees know, or suspect is offered with the expectation that it will obtain a business advantage for them; or accept a gift or hospitality from a third party if employees know or suspect that it is offered or provided with an expectation that a business advantage will be provided by Termination Technology Ltd In return; or 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.

Other Payments

Termination Technology Ltd does not make and will not accept facilitation payments or "kickbacks" of any kind.

Kickbacks are typically payments made in return for a business favour or advantage. If employees are asked to make a payment on the Company's behalf, employees should always consider what the payment is for, and whether the amount requested is proportionate to the goods or services provided.

Employees should always ask for a receipt, which details the reason for the payment. If employees have any suspicions, concerns or queries regarding a payment, they should raise these with a Senior Manager or the Director

Donations

Termination Technology Ltd does not make contributions to political parties. Only charitable donations that are legal and ethical under local laws and practices will be made.

No donation must be offered or made without the prior approval of the Director or nominated Senior Manager.

Record-Keeping

The Company will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties. Therefore, employees are expected to notify the nominated Senior Manager of all hospitality or gifts to a value of more than £50 accepted or offered.

Any expenses claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with the company expenses policy, and specifically record the reason for the expenditure.

All accounts, invoices, and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared completed and maintained with strict accuracy.

No accounts must be kept concealed "off-book" to facilitate or conceal improper payments.

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy.

Our 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.

Responsibilities

The prevention, detection and reporting of bribery and other forms of corruption is the responsibility of all those working for Termination Technology Ltd or under its control and all are required to avoid any activity that might lead to, or suggest, a breach of this policy.

The Director has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations, and that all those under its control comply with it.

Management at all levels 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.

All individuals (including employees, contractors, business partners and suppliers) are responsible for ensuring that they have read, understand and comply with this policy if an individual believes or suspects that a conflict with this policy has occurred, or may occur in the future, they should report it to the nominated senior Manager.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. The Company reserves the right to terminate contractual relationships with other individuals if they breach this policy.

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If employees are unsure whether a particular act constitutes bribery or corruption, the matter should be notified to the nominated Senior Manager.

Concerns should be reported as a protected disclosure to employee's line manager or to the Director. Statutory protection of 'whistle-blowers' is afforded under the Public Interest Disclosure Act 1998.

Signed:

Chris Prosser
Director

Date: 02 November 2018