

TGC International Ltd.



# ANTI CORRUPTION & BRIBERY POLICY

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**REVISION: 04**

TGC International Ltd prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of TGC International Ltd or of the person or body employing them or whom they represent.

### **Introduction**

Prevention, detection and reporting of bribery or corrupt practices is the responsibility of all employees. You must report any suspicion of bribery or corrupt practices.

### **Purpose**

The purpose of this document is to serve as a guide for all employees of TGC International Ltd. It explains the steps needed to be followed in order to ensure TGC International Ltd maintains its values and adheres to corporate responsibility, societal and legal expectations.

### **Policy**

You must not, directly or indirectly;

- offer; give; solicit or accept any bribe, either in cash or any other form of inducement, to or from any person or company, wherever they are located and whether they are a public official or body or private person or company.

You must not, directly or indirectly,

- gain any commercial, contractual or regulatory advantage for TGC International Ltd in a way which is unethical or contrary to law.

### **Responsibility**

This policy is applicable to all employees of TGC International Ltd, regardless of seniority.

You should not be prohibited from performing your work provided the activities are customary, appropriate and properly recorded, for example acceptable activities include:

- normal hospitality
- providing resources to assist the person or body to make the decision more efficiently provided it is for this purpose only

Remember that market practice varies according to country and what is normal and acceptable in one place may not be in another. Moreover, our ethical values, as detailed in our Corporate Social Responsibility Policy, must underpin any activity you undertake.

### **Adherence**

It may not be easy to make a decision if something is appropriate. If you are in doubt that a potential act does not conform to the requirements of this policy, the matter should be referred to the Managing Director.

TGC International Ltd will investigate seriously any actual or suspected breach of this policy, or the spirit of this policy. Employees may be subject to disciplinary action and which may ultimately result in their dismissal. In the case of third parties found to be bribing or attempting to bribe TGC International Ltd employees, a senior officer, a supplier or customer, they will be informed in writing that all business dealings will be ceased and appropriate authorities will be informed.

TGC International Ltd has a zero-tolerance approach to bribery and will take disciplinary action immediately for any actual or potential breaches.

Revision	Issue Date	Reviewer	Details of Amendment
Revision 0	October 2017	Jayson Stickings, MD	Template Change
Revision 1	October 2018	Jayson Stickings, MD	No change
Revision 2	October 2019	Jayson Stickings, MD	No change
Revision 3	December 2021	Jayson Stickings, MD	Minor editorial changes
Revision 4	February 2023	Jayson Stickings, MD	No change
Revision 5			
Revision 6			