


## Anti-Bribery Policy



	<b>IMS Document Title:</b> Anti-Bribery Policy		
	<b>Department:</b> Human Resources	<b>Ref No:</b> IMS-PO-002	<b>ISO:</b> 9001 & 14001
	<b>Approved By:</b> Adam Thrussell	<b>Issue:</b> 1.0	<b>Date:</b> Jan 22

### **Anti – Bribery Policy Statement**

In accordance with the Anti – Bribery Act 2010 that came into effect in July 2011, the Directors of TSG are committed to ensuring that the company operates in an honest way and without the use of corrupt practices or acts of bribery to obtain an unfair advantage.

Our Anti – Bribery policy sets out the general rules and principles to which the Company adheres.

The policy is communicated to all employees within the company as well as suppliers and clients. Employees who work in areas of the company that are identified as having a potentially higher risk will receive additional training and support in identifying and preventing corrupt practices.

All employees are required to abide by all aspects of this policy.

The Managing Director together with other Company Directors are responsible for compliance with the requirements of this policy within each area of the business.

The Board of Directors will support each area of the company to reinforce this policy through guidance, monitoring and updating


The policy will be reviewed on annual basis to ensure on-going compliance with the Anti – Bribery Act 2010 and all subsequent changes in legislation.

**Signed:**



**Date:** 4<sup>th</sup> January 2022

**Position:** Chief Executive Officer & Owner

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## Steps we take to prevent bribery and corruption

### 1. Risk assessment

Effective risk assessment is critical to the success of this policy. By identifying the risk of bribery and corruption in particular situations the Company can evaluate and mitigate the risks and protect against them.

TSG's management must therefore continue to assess, on an ongoing basis, their business unit's vulnerability to these risks with ongoing communication between local management and the Company's Head Office.

### 2. Accurate books and record keeping

We must ensure that accurate books, records and financial reports are maintained within the Company's business activities. Books, records and financial reporting must be transparent and accurately reflect each of the underlying transactions. Reference should be made to the Company Finance Manual which specifies the requirements that are already in place i.e., the checks to be made for new agents and customers.

### 3. Effective monitoring and control

Each area of the business must maintain an effective system of internal control and monitoring of its transactions. If bribery and corruption risks are identified and highlighted through the risk assessment process then procedures must be adopted to mitigate these risks.