



Anti-Bribery & Corruption Strategy

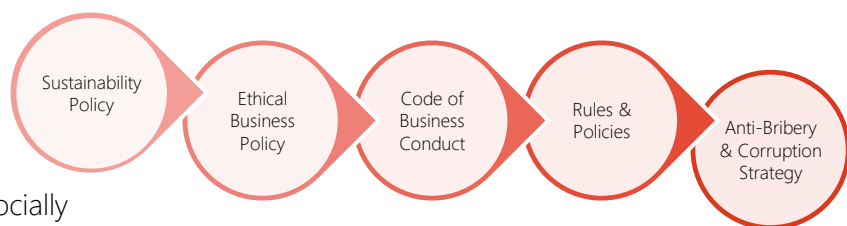
1 Introduction

This document is a Strategy Summary. It explains how TGP’s Integrated Management System (IMS) controls Anti-Bribery & Corruption Risk, to meet legal obligations and deliver the group’s policy commitments. It applies across the Trans Global Projects Group and is a non-negotiable part of the values of the Trans Global Projects name.

This document is not signed: it does not make new commitments of policy, but rather explains how the IMS delivers the commitments made by the Group Managing Director in the published policies.

1.1 Policy Commitment

TGP has made a clear and unequivocal commitment to conduct its business in “a legal, ethical and socially responsible manner” as part of its Sustainability Policy, the key commitment and direction for the Business and Integrated Management System.



To explain this element of TGP’s values, TGP has published an Ethical Business Policy, which states that “As a point of principle, TGP is committed to neither offer, accept nor acquiesce to any form of bribery or inducement payment”. The simplicity of this commitment reflects the core principle, that bribery or corruption will be outside the norms and culture that TGP foster and beyond the range of behaviour it will accept.

Both these published policies carry the signature of the Group Managing Direct as demonstration of his personal commitment to these values, that will apply throughout the business. Every person joining TGP must complete a mandatory training module on Policies & Principles and pass an

assessment testing understanding and the ability to apply these values in practice (as well as undertaking focussed Anti-Bribery Training discussed below).

This document expands upon these policies by explaining how the IMS will address this focus area.

1.2 Legislative Context

Strong Anti-Bribery & Corruption controls are intrinsically important to TGP – a key Ethical and Social commitment to ensuring fair and sustainable business – but are also part of commitment to operate worldwide in a fully legally compliant manner.

As a Global Business, TGP will comply with Bribery & Corruption Legislation in each territory where it operates its offices, engages sub-contractors, provides services or transports cargo.

TGP has made the UK Bribery Act the focus of this compliance effort. Although, as a Group, TGP has rich organisational and ownership links to the UK, and is subject to the Act, this decision has been made because this act provides one of the most stringent regimes of Anti-Bribery Control. TGP has implemented a strong system of control which will ensure that payments are made only as part of a legitimate, transparent commercial relationship or where required by law. This strong system of control is outlined in this strategy document.

1.3 Documentation Framework

TGP has established a framework of documentation to implement its policy commitments and provide clear and unequivocal guidance to staff. These documents are shown in the table below.

Document	Purpose
Sustainability Policy	Top-level commitment to doing business the right way.
Ethical Business Policy	Supporting policy detailing business ethics
Code of Business Conduct	Detailed guidance on what these measures mean in practice
Gifts & Hospitality Policy	Rules on recording, plus limits on what is acceptable
Donations Policy	Criteria, limitations and recording of charitable contributions
Anti-Bribery & Corruption Rules	Rules and examples to help avoid Bribery risks
Strategy (this document)	Explanation and commentary for Interested Parties

2 Anti-Bribery & Corruption Risks

TGP has carefully evaluated risks of Bribery and Corruption in its service offering and evaluates these within each new project undertaken – typically as part of a Project Sustainability Plan or equivalent structure. Some of the key areas are described below.

2.1 Liaison with Governmental Agencies

Standards of official conduct and robustness of control on the behaviour of officials may vary globally. TGP's approach will not. Payments may only be made to those discharging a government function where they are required by law.

TGP is aware of particular risks around customs and permitting arrangements, hence applies specific additional Due Diligence controls where it trusts a third party to discharge these functions. At a lower level these may apply through hauliers encountering police corruption at the roadside or routine inspection points.

2.2 Beneficial Interests

An extension of the risk of direct payment to Governmental Officials, is the practice of securing advantage through a beneficial interest which secures unethical access or influence. For this reason, TGP will ensure that it knows who it is dealing with, when it entrusts them to liaise with governments, through Due Diligence controls.

2.3 Selection Inducement

All commercial selection decisions may be based on an open assessment of the commercial value the partner will provide. This shall be true when TGP tenders or quotes for work – this is assured through the close involvement of Senior Management and Directors in all quoting and tendering activity. This will also be the case where suppliers are appointed or contracts allocated – for this reason TGP utilises a Modular Supplier Approval Framework that provides transparent information about a sub-contractor's demonstrated capabilities, provides a transparency of who champions a supplier within TGP and ensures the oversight of approval process by multiple departments.

2.4 Third-Party Practices

Core to TGP's model is entrusting a Third Party to deliver part of a logistics service. TGP is therefore acutely aware of the risk that they may not share TGP's values and may engage in corrupt practices internally or in their dealing with others. For this reason, the Supplier Approval Process seeks to confirm or obtain policy-level commitment to TGP's core business values – either through acceptance of TGP's policies or by obtaining copies of the supplier's own. This process confirms understanding of these (and other) simple rules and confirms the level of capability to enforce these norms within their workforce and (where applicable) supply chain. TGP therefore obtains clear commitments from all its suppliers that they understand that no bribe or corrupt payment shall be made on TGP's behalf.

2.5 Corruption Profile Information

To avoid making decisions on prejudice or outdated opinion, TGP makes objective, regularly-updated information on transparency and national risks of corruption available to its teams.

Currently, TGP personnel are directed to the TRACE Bribery Risk Matrix database as a guide to the risks in countries and regions.

2.6 Risk 'Red Flags'

In general terms, some red flags to watch out for include:

- Third-parties located or doing business in a country with high levels of corruption (on the TRACE Matrix)
- Objections to representations regarding compliance with anti-corruption laws
- A lack of experience with product, field or industry or qualified staff
- Disproportionate commission/fees/cash payments onshore vs. offshore
- Fees linked to a percentage of the project cost or value
- Request for money to be paid into a personal or offshore bank account
- Services detailed to be provided are vague
- Third-party is a relative or close associate of a present or former official
- Previously convicted of, or is alleged to have been involved in illegal conduct
- Rising expenses for goods and services
- Increasing purchases from one vendor
- No division of duties between new vendor approval and authorisation for purchasing
- Contracts written to limit competition

Due Diligence and the role of the TGP Operations team will allow identification of these red flags, training and awareness will drive action.

3 Staff Control & Code of Conduct

All personnel joining a TGP Group Company complete an Induction Syllabus designed to ensure that they understand Anti-Bribery & Corruption risks and the company's clear policies preventing such behaviour. This includes specific, certificated Anti-Bribery & Corruption training based on a Transparency International syllabus.

3.1 Recruitment Verification

As part of recruitment, individuals will be asked to declare family and business connections to anyone within TGP, its customers, suppliers or government agencies. These are tracked as part of a Register of Interests. Background, criminal record and employment reference checks are completed in line with local norms and legal requirements.

3.2 Code of Business Conduct & Policy Framework Declaration

All TGP personnel work to a Code of Business Conduct (an unequivocal statement of expectations and acceptable behaviour) enforceable as part of their contract of employment. This is supported by policies on Gifts & Hospitality, Donations and a set of Anti-Bribery & Corruption Rules.

An annual declaration is required from all members of staff confirming that they understand, accept have followed and will follow this Code. This annual sign-up also reminds them of key obligations and refreshes declarations around any potential conflict of interest or changes in the information checked as part of recruitment.

4 Due Diligence

Due Diligence ensures that the sub-contractors TGP engages are

- Reputable – having the requisite experience and expertise
- Credible – of reasonable standing in the industry / able to provide acceptable business references
- Financially stable – possessing adequate resources to fulfil commitments
- Committed – to comply with all applicable laws and to not make improper payments, sharing TGP’s ethical values or agreeing to adhere to them when they work for us.

4.1 Supplier Approval

TGP has established a Modular Supplier Approval Framework to evaluate its sub-contractors demonstrated capabilities and communicate this information to those allocating work. This is described in detail within IMS-COR-SUB, where the mode of assessment and requirement for certain modules to be completed are set out.

In all cases, approval modules provide a set of questions for sub-contractors to demonstrate their capabilities and commitment, to show how well they align with TGP’s vision. These questions are the starting point for an assessment which may include external referrals, objective publicly-available evidence, face-to-face and/or on-premises assessment; but will ultimately culminate in a Director-level decision on whether the Supplier have met the module’s requirements. The close involvement of transparently-nominated internal sponsor, the Compliance Team who provide technical review of submitted evidence and an authorising Director ensures demonstrable impartiality in this process.

4.2 General Due Diligence

TGP’s Basic Management System Approval Module applies to all sub-contractors. It requires demonstration of commitment to value equivalent to TGP’s Ethical Business Policy (anti-bribery commitment), understanding and acceptance of core standards for key activities and a basic Management System capable of controlling employee and sub-supplier behaviour.

4.3 Advanced Due Diligence

A specific Advanced Due Diligence module is used to gather detailed information for sub-contractors who wish to be entrusted with high-risk roles such as liaison with government authorities (e.g. customs clearance), particularly in countries who score poorly within the TRACE Matrix. This includes questions exploring beneficial interest, policy and practice, internal control, employment screening and other elements of compliance culture.

5 Communication, Reporting & Whistleblowing

5.1 Communicating TGP's Values

TGP publishes its key policies on its web site and makes these available to all. This Strategy has been prepared for the Group's Leadership Team, but can be made available to customers, prospective customers and other interested parties.

To further demonstrate its robustness in this regard, TGP maintains a subscription to the TRACE service and makes its TRACE Due Diligence Review report available on request (to ensure the transparency of this report it is always supplied directly from that organisation).

5.2 Reporting Incidents

TGP provides an Incident Reporting platform accessible to everyone to identify concerns or any occurrence breaching our policy. This is available to all sub-contractors or customers via their normal TGP point of contact. Reports are investigated, prompt corrective action where they indicate a system issue and are both fully-accessible and proactively communicated to senior management in every case. TGP encourages proactive reporting and will explore the full facts – there are rare situations where an inappropriate payment may be necessary out of fear for individual safety: in such a genuine, promptly-reported case this will be dealt with sympathetically, but transparently.

5.3 Compliance Register

A Compliance Register is provide centrally to provide a facility to securely record matters of concern, potential Anti-Bribery & Corruption concerns (unusual requests), potential conflicts of interest or legitimately approved gifts, hospitality or entertainment (including any reimbursement of costs to public officials). This register is secure in that entries cannot be expunged once entered.

5.4 Whistleblowing

Where the normal route of raising an incident has not operated correctly or is inappropriate, TGP provides a 'Tell Us' facility on its web-site for anyone worldwide to report concerns directly to the Compliance Team and nominated Directors. This establishes a separate, open route for a protected disclosure or anonymous report.

6 Review, Evaluation & Improvement

Anti-Bribery & Corruption is handled as an element of the IMS. As such it benefits from proactive, systematic audit (alongside other disciplines and criteria), evaluation and Management Review. Where systems have not work or can be improved, they will be developed and refined.

This Strategy ensures that the policy commitments made are delivered through a structured, cohesive effort across the organisation as part of an Integrated Management System.

Document Metadata

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Comment	Updated to reflect improved documentation, Compliance Register and annual sign-up commitments.

Version & Change History (Issued Revisions - minimum last 2 years)

1.0	By: Ian Holroyd <i>Initial Strategy document prepared to communicate structures in place</i> Approved by Matt Jackson 05/12/2019
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