



# Supplier policy

Anti-bribery and Corruption | April 2023

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- 1 TLT strictly prohibits the following practices in its supply chain, and expects its suppliers and sub-contractors to prohibit the following practices:
  - 1.1 giving or offering a bribe;
  - 1.2 receiving or requesting a bribe;
  - 1.3 bribing a foreign official;
  - 1.4 facilitation payments and kickbacks.
- 2 Suppliers must both comply with all applicable anti-bribery laws in the jurisdictions in which they work. This includes complying with the provisions of the Bribery Act 2010. In addition, suppliers must have means of ensuring that the subcontractors in their supply chain also comply with all relevant laws.
- 3 We expect all our suppliers (or anyone acting on their behalf) never to:
  - 3.1 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;
  - 3.2 give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
  - 3.3 accept a payment, gift or hospitality from a third party that you know, or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return;
  - 3.4 accept hospitality from a third party that is unduly lavish or extravagant under the circumstances;
  - 3.5 offer or accept a gift to or from government officials or representatives, or politicians or political parties;
  - 3.6 threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised bribery concerns;
  - 3.7 engage in any other activity that might be considered a breach of the applicable anti-bribery laws;
  - 3.8 make, nor accept, facilitation payments or kickbacks of any kind.
- 4 The Supplier must ensure it operates its own written Anti-Bribery policies and procedures designed to manage the risk of bribery, including maintaining and enforcing them to avoid breaches of national and international laws. We will ask for a copy of such policies annually. If you do not have these policies we will ask you to sign our Anti Bribery Statement.
- 5 The supplier must ensure that all persons engaged by it are aware of routes to report instances of suspected bribery or attempted bribery.
- 6 The supplier must retain all relevant records including any actual or suspected instances of bribery.
- 7 The supplier should ensure that all employees complete anti-bribery training and awareness activities appropriate to both their individual roles and the level of bribery risk associated with the role.

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