

Tiger Supplies is committed to conducting business in an honest way and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. No-one within the company will directly, indirectly, offer, solicit, accept or receive any gift, payment or any other advantage from any person or organisation in return for providing improper business or other advantage.

Definitions:

Corruption can be defined as the abuse of public or private office for personal gain. It is important to note that corruption occurs even when there has not actually been a benefit but an expectation of one.

Bribery is a form of corruption. It can be defined as giving, promising, offering, requesting, agreeing to receive or the acceptance of any gift, fee or other reward, to or from any person (in government or business), as an incentive to gain a financial or other advantage (such as a commercial or regulatory advantage) that is dishonest, illegal, improper or a breach of trust.

It is unacceptable for any person acting on behalf of the Company to participate in any form of bribery or corruption as follows:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a financial or other advantage (such as a commercial or regulatory advantage) will be received, or to reward a business advantage already given;
- 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
- Accept a payment from a third party that you know or suspect is offered with the expectation that it will obtain a financial or other advantage (such as a commercial or regulatory advantage) for them; or
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a financial or other advantage (such as a commercial or regulatory advantage) will be provided by the Company in return.

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to 10 years imprisonment. If the company is found to have taken part in the corruption or lacks adequate procedures to prevent bribery, it could face an unlimited fine, be excluded from tendering for Government contracts and face untold damage to its reputation.

Understanding Specific Areas of Risk

While high profile cases of bribery, involving large sums of cash and senior executives are most likely to hit the headlines, bribery can be a risk in many areas of our industry:

- Kickbacks and reciprocal agreements
- False claims
- Corrupt third parties (including agents, consultants, contractors or sub-contractors)
- Excessive gifts and hospitality
- Inadequate financial controls or record keeping

Kickbacks and reciprocal agreements or any other form of 'quid pro quo' are never acceptable. We will not participate in cartels, cover pricing, bid-rigging or any form of collusion.

We will never offer accept facilitation or other improper payments to obtain new business, retain existing business, or secure any improper advantage.

Corrupt third parties can include a range of people acting on our behalf such as agents, consultants, contractors or sub-contractors. We wish to work only with those who are committed to our standards and will undertake due diligence to ensure this. We will engage a third party only when there is a clear business rationale for doing so and with an appropriate contract. We will ensure all payments to third parties are properly authorised and recorded.

Excessive gifts and hospitality can be used to exert improper influence on decision makers. We will only accept gifts and hospitality in accordance with this policy. We will ensure any gifts or hospitality we offer are reasonable in terms of value and frequency. We will never offer or accept gifts or hospitality if we feel it could influence a business decision or give the appearance of doing so.

Inadequate financial controls or record keeping can be exploited to hide bribes or corrupt practices. We will ensure we have robust controls in place so that our financial and other records are accurate and complete and never misleading.

## Gifts and Hospitality

The Company appreciates that giving and receiving gifts or hospitality can help build goodwill in business relationships but they are only appropriate in limited circumstances. This Policy does not prohibit reasonable, proportionate and appropriate hospitality with third parties.

In no circumstances should any employee offer, give or accept any gift or hospitality regardless of value, which might be construed as influencing a business decision.

The following points should be considered when you are faced with an opportunity to give or receive gifts or hospitality:

- What is your intention when offering a gift or hospitality or what do you think is the intention of the business partner when offering the same to you?
- Is the intention to build a business relationship or to influence a business decision such as the award of a tendered contract?
- Is the nature of the gift or hospitality modest or could it make you (as the recipient) feel under an obligation to give something back?
- Are you happy to justify giving or receiving the gift or hospitality? If it doesn't feel right, it probably isn't.

Individuals must always seek prior approval from your Line Manager before offering or accepting any gifts or hospitality.

There are some kinds of gifts or hospitality which should never be considered as acceptable. We have assessed that the following areas are at risk and as such, you should not give, offer or receive or approve any:

- Gifts or hospitality involving third parties involved in any competitive bid or tender process that you are - or may be considered to be involved in;
- Payments of cash (or cash equivalents) or paying someone else's personal bills or expenses;
- Gifts given or received from government officials or representatives;
- Any hospitality that may be considered indecent or inappropriate as part of a business relationship or which may have a negative affect on the Company's reputation; and
- Gifts or hospitality that you are not prepared to report or seek approval for internally irrespective of whether you use personal or company hospitality.

## Record Keeping

All hospitality or gifts accepted or offered must be recorded, and will be subject to managerial review. All expenses claims relating to hospitality gifts or expenses incurred to third parties should be submitted in accordance with the Company expenses policy.

No undisclosed or unrecorded account, fund or asset shall be established or maintained by any person or organisation. Full and proper records shall be kept of all transactions involving the Company. Supporting documents shall be readily available, genuine and shall accurately describe the nature of any transactions undertaken.

This policy is fully supported by the Tiger Supplies Board of Directors and will be communicated to everyone in the business to ensure their commitment to it. The Board attaches the utmost importance to this policy and will apply a zero tolerance approach to acts of bribery and corruption by any of our employees or third party representatives. Any breach of this policy will be regarded as a serious matter by the Company and is likely to result in employees facing disciplinary action, including dismissal or if a business partner facing appropriate sanctions in addition to civil or criminal charges.

This policy applies to individual employees, sub-contractors, consultants, agents or any other people or bodies associated with Tiger Supplies.

A handwritten signature in black ink, appearing to read 'Clinton Fisher', with a long, sweeping flourish extending to the right.

Clinton Fisher  
Managing Director

Version 3  
Date: 11/11/2019