

Anti Bribery and Corruption (ABC) Policy, TCL-POL-005, Rev 0

Purpose

The Changineer Ltd is committed to conducting business with integrity, honesty, and transparency. This Anti-Bribery and Corruption (ABC) Policy establishes guidelines to prevent bribery and corruption in all business activities and relationships.

Scope

This policy applies to all employees, contractors, consultants, and any third parties acting on behalf of The Changineer Ltd worldwide.

Policy Statement

Bribery and corruption in any form are strictly prohibited. Employees and representatives of The Changineer Ltd must not offer, give, request, or accept bribes or facilitation payments under any circumstances. Violations will lead to disciplinary action, including termination, and may result in legal consequences.

Definitions

- **Bribery:** Offering, giving, receiving, or soliciting something of value as an influence in business decisions.
- **Corruption:** Abuse of entrusted power for private gain, which includes but is not limited to bribery, extortion, fraud, and embezzlement.
- **Facilitation Payment:** Small payments made to expedite or secure routine government actions (e.g., permits, licenses), which are not permitted under this policy.

Acceptable Business Practices

- **Gifts and Hospitality:** Modest gifts or hospitality that are reasonable, proportionate, and for legitimate business purposes are allowed, provided they are not intended to influence decisions.
- **Charitable Contributions:** Contributions made on behalf of The Changineer Ltd must be transparent, lawful, and not intended to gain an improper business advantage.
- **Third-Party Relationships:** All third-party engagements (e.g., consultants, agents) must be vetted to ensure compliance with anti-bribery standards.

Employee Responsibilities

Employees must:

- Not engage in any form of bribery or corruption.
- Report any suspicion or evidence of bribery or corruption through established reporting channels (Compliance Officer).
- Complete required ABC training as part of onboarding and annual refreshers.
- Seek guidance from management or compliance when uncertain about any business transaction or gift.

Reporting Violations

All employees and representatives are required to report any suspected or known instances of bribery or corruption immediately. Reports can be made to info@thechangineer.co.uk, and confidentiality will be respected. Retaliation against whistleblowers is strictly prohibited.

Monitoring and Review

The Changineer Ltd will regularly review and monitor ABC policies and procedures to ensure effectiveness and compliance with legal and regulatory changes. Any updates will be communicated promptly.

Consequences of Non-Compliance

Violations of this policy will result in disciplinary action, up to and including termination. Severe violations may be reported to relevant authorities, leading to possible criminal charges.

This Policy is available to our Stakeholders on request.

Signed by:



Danielle Dale, Director

November 2024