

Techno Group Anti Bribery Policy

Introduction

Techno Group Ltd and its' subsidiaries, Technoset Ltd and Technoturn Ltd, are committed to promoting and maintaining the highest level of ethical standards in relation to all business activities. We therefore have a zero-tolerance policy towards bribery and corruption and are committed to acting fairly and with integrity in all business dealings and relationships.

Policy

The aim of this policy is to ensure Techno Group Ltd and its' subsidiaries act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of our zero-tolerance to bribery.

This policy applies to all permanent and fixed-term staff employed by Techno Group Ltd and its' subsidiaries and to any contractors, consultants or other persons acting under or on behalf of the Techno Group Ltd and its' subsidiaries.

Techno Group Ltd and its' subsidiaries will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, kickbacks of any kind.

Company Responsibility

- To keep appropriate internal records that will evidence the business reason for making all payments to third parties.
- To encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- To ensure that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

Employee Responsibility:

- To act honestly, responsibly and with integrity
- To safeguard and uphold our core values by behaving in an ethical, professional and lawful manner at all times.
- Employees must not, in relation to their employment, accept, request or offer a financial or other reward in return for providing some favour to another person or company.

Business Gifts

The giving of business gifts to clients, customers, contractors and suppliers is not prohibited; provided the following requirements are met:

- The gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage
- It complies with local laws
- It is given in the Techno Group Ltd and its' subsidiaries name, not in the giver's personal name



Technoset Ltd

Unit 3A Roman Way, Glebe Farm Industrial Estate,
Rugby, CV21 1DB. +44 (0) 1788 560 522 . sales@techno-group.co.uk
UK Company Registration No 3061083

Technoturn Ltd

9/12 Brunel Road, Churchfields Industrial Estate,
St Leonards-on-Sea, TN38 9RT East Sussex. +44 (0) 1424 850 066
UK Company Registration No 03027198

- It does not include cash or a cash equivalent (such as gift vouchers)
- It is of an appropriate and reasonable type and value and given at an appropriate time
- It is given openly, not secretly
- It is approved in advance by a director of the Company.

The receiving of business gifts by employees from suppliers, contractors or customers is not prohibited; provided the following requirements are met:

- The gift is not accepted with the intention of rewarding the donor with any business advantage in any way
- It complies with local laws
- It is received openly, not secretly
- It does not include cash or a cash equivalent (such as gift vouchers)
- It is of an appropriate and reasonable type and value and given at an appropriate time
- It is advised to a director upon receipt.

Sanctions for Breach

A breach of any of the provisions of this Policy by an employee will constitute a disciplinary offence and will be dealt with in accordance with our disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal.

A breach of this Policy by any contractor, agency or supplier could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

Monitoring Compliance

The directors will monitor compliance with this Policy and will review its contents on a regular basis to ensure the Policy continues to comply with our legal and ethical obligations.

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