



Anti-Bribery Policy

Introduction

T-Prime Limited values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of T-Prime Limited's staff and those acting on its behalf are key to maintaining these standards.

The purpose of this document is to set out T-Prime Limited's policy in relation to bribery and corruption. The policy applies strictly to all employees, partners, agents, consultants, contractors, sub-contractors, and to any other people or bodies associated with T-Prime Limited within all offices, areas and functions.

Understanding and recognising bribery and corruption

Bribery is receiving or offering a gift, loan, payment, reward or other advantage from or to another person to influence them in some way or as an encouragement to do something which is dishonest, illegal or a breach of trust in the conduct of the Company's business.

Corruption is the misuse of entrusted power for private gain and may also include bribery.

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest under the circumstances. If you are found to have acted against UK bribery and corruption law, you could face 10 years in prison and/or an unlimited fine, and the Company could also be liable to an unlimited fine and Government sanction.

Policy

T-Prime Limited will not tolerate bribery or corruption in any form.

T-Prime Limited prohibits the offering, giving, solicitation or acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- to or from any person or company wherever located, whether a public official or public body, or a private person or company;
- by any individual employee, partner, agent, consultant, contractor or other person or body acting on T-Prime's behalf;
- in order to gain any commercial, contractual or regulatory advantage for T-Prime Limited in any way which is unethical, or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:



- normal hospitality;
- fast tracking a process which is available to all on the payment of a fee; and/or
- providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only.

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to Nigel Jordan who is T-Prime Limited's Compliance Officer for Legal Practice (COLP).

T-Prime will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

Key risk areas

Bribery can be a risk in many areas of T-Prime's business pursuits. Below are the key areas you should be aware of in particular:

- Excessive gifts, entertainment and hospitality can be used to exert improper influence on decision makers. Gifts, entertainment and hospitality are acceptable provided they are within reasonable limits and are authorised by a director. Any gift or hospitality, either given or received, over the value of £50 per person should be reported to the COLP.
- Facilitation payments are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right. T-Prime Limited will not tolerate or excuse such payments being made.
- Reciprocal agreements or any other form of 'quid pro quo' are never acceptable unless they are legitimate business arrangements which are properly documented and approved by a director. Improper payments to obtain new business, retain existing business or secure any improper advantage should never be accepted or made.
- Actions by third parties for which T-Prime Limited may be held responsible can include actions by a range of people (e.g. agents, contractors and consultants) acting on T-Prime Limited's behalf. Appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorised and recorded.
- Record keeping can be exploited to conceal bribes or corrupt practices. We must ensure that we have robust controls in place so that our records are accurate and transparent. The COLP is responsible for all record keeping.



Employee responsibility and how to raise a concern

The prevention, detection and reporting of bribery or corruption are the responsibility of all directors, employees and sub-contractors of T-Prime Limited. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this to the COLP without delay.

Signed 

Print name Mr Anatolie Teterea

Date 25 October 2023

