

Anti-Bribery and Corruption Policy

TLJ Group 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 the organisation's employees are key to maintaining these standards.

The purpose of this document is to set out TLJ Group Limited policy in relation to The Bribery Act 2010 which came into force in July 2011. The policy applies strictly to all employees, directors and any others associated with the organisation.

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 in the circumstances.

Bribery can be defined as offering, promising or giving financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

TLJ Group Limited will not tolerate bribery or corruption in any form.

The organisation prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether 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, director or any person acting on behalf of TLJ Group Limited
- * in order to gain any commercial, contractual or regulatory advantage for the organisation 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, provided that it complies with TLJ Group Limited, entertainment policy.
- * 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, providing 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 the HR manager or Director.

The organisation 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 formal disciplinary action which may result in their dismissal.

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the organisation. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or is corrupt, then you have a duty to report this. Any such incidents should be reported in accordance with TLJ Security Systems Whistle Blowing Policy.

This Policy has been approved & authorised by:

Name: Claire Martin

Position: HSQE and HR Director

Date: 15/09/2025

To be reviewed: September 2026

Signature: 