



## ANTI-BRIBERY & CORRUPTION POLICY

### Introduction

One of the key values of Tigers is **Integrity**:

*"We are honest, open, ethical and fair. We speak up when our core values are not being respected"*

In line with this core value, we take a zero-tolerance approach to bribery and corruption across all jurisdictions in which we operate. We do not engage in or accept any form of bribery, collusive anti-competitive discussions, or arrangements.

This policy establishes controls to ensure that we live up to these values.

### Scope

Non-compliance is a matter for both the company and the individual. The company is liable for the actions of all our colleagues or agents who commit a corruption offence with the intention of obtaining or retaining business for the company. If we fail to prevent corruption, we are liable to a fine, imprisonment and damage to our excellent reputation. The individual is also liable to personal prosecution and so you are responsible for ensuring your adherence to this policy.

We therefore take this matter extremely seriously. Any colleague who breaches this policy will face disciplinary action, up to and including dismissal. We will also take immediate action against any agents up to and including contract termination.

### Key Definitions

#### ***What is Bribery?***

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage, whether received intentionally or unintentionally.

#### ***What is Corruption?***

Corruption can be defined as the abuse of entrusted power for private gain of the individual or company. Corrupt business practices put the interests of an individual or company before the interests of the environment, customers, societies, communities, and other key stakeholders.

#### ***How does this apply to gifts (including hospitality)?***

One cannot give a gift, consideration or advantage to a person knowing that this will be used to facilitate an offence. However, this does not prohibit gifts of low value (below €100 in value) and normal and appropriate hospitality that are given in good faith rather than



to secure an improper advantage. This applies equally to the giving and the receiving of gifts. Any gifts to an individual which have a value more than €100 must be notified to the executive management team who will decide if it is appropriate to accept the gift.

### **Records**

A written record of all gifts given or received above €100 in value must be maintained.

### **Raising a Concern**

All colleagues are encouraged to report any concerns they may have to their line manager or directly to a member of the Executive Team as soon as practical.

Any such reports made in good faith will be treated seriously and the reporter will be supported by the company ensuring that they will not be subjected to any detrimental treatment because of the report.

The company may be required to report any confirmed instances of bribery or corruption to the relevant law enforcement authority.

### **Communication Plan**

A copy of this policy is available to all colleagues. Policy updates will be communicated to all colleagues.

### **Policy Review**

**Policy Created:** November 2021

**Policy Updated:**

**Policy Reviewed:** Bi-annually