



LGL-POL-07-01

Torus Anti-Bribery Policy

November 2018

Contents

Page

1. Policy Aim	4
2. Scope	4
3. Policy Detail	4
4. Policy Implementation	5
5. Review Information	5

1. Policy Aim

- 1.1 As a Registered Provider, Torus62 Limited (hereinafter called "Torus") has a policy to conduct all its business in an honest and ethical manner. Torus takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery.
- 1.2 Torus will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it operates. However, Torus remains bound by the laws of the UK, including the Bribery Act 2010, in respect of its conduct both at home and abroad.
- 1.3 The purpose of this policy is to set out Torus' responsibilities, and of those working for the company, in observing and upholding its position on bribery and corruption.
- 1.4 In this policy, **third party** means any individual or organisation with which Torus comes into contact during the course of business and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

2. Scope

- 2.1 This policy applies to all individuals working at all levels and grades, including board directors, officers, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us or their employees, wherever located (collectively referred to as **workers** in this policy).
- 2.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Torus or under its control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3. Policy Detail

- 3.1 Torus will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- 3.2 Reports of all hospitality or gifts accepted or offered, will be made in accordance with the Probity Policy and Code of Conduct which will be subject to managerial and Board review.
- 3.3 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, will be prepared and maintained with strict accuracy and completeness in accordance with Torus' Financial Regulations. No accounts will be kept "off-book" to facilitate or conceal improper payments.

- 3.4 Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing will not suffer repercussions as a result and Torus will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 3.5 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Torus reserves the right to terminate any contractual relationship with other workers if they breach this policy.
- 3.6 A breach of this policy will be dealt with following the agreed process set out in the Anti-Bribery Procedure document.

4. Policy Implementation

- 4.1 The Board of Directors has overall responsibility for ensuring this policy complies with Torus' legal and ethical obligations, and that all those under its control comply with it. Any incidents of Bribery will be reported to the Board and the Regulator and the Board will review and restate its approach to bribery and corruption on an annual basis.
- 4.2 The Company Secretary has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.
- 4.3 Training on this policy will form part of the induction process for all new workers. All existing workers will receive a briefing on how to implement and adhere to this policy.
- 4.4 Torus' zero-tolerance approach to bribery and corruption will be communicated to all suppliers, contractors and business partners at the outset of the business relationship with them and as appropriate thereafter.
- 4.5 The Group Head of Legal Services will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.
- 4.6 This policy does not form part of any employee's contract of employment and it may be amended at any time.

5. Review Information

- 5.1 The company will review this policy annually and provide for interim reviews in light of legislative or policy changes.