



# ANTI- CORRUPTION POLICY

Adopted: June, 2018 V1

## ○ PREAMBLE

The diversion of resources or miss-use of power compromises our values and our accountability to business partners around the world and our community.

Suggestions that TT Cables is linked to corruption can be damaging to reputation - undermining the morale of staff and the trust and support of Suppliers, Customers, and the wider public. Corruption also poses legal risks both for the Company and individuals involved. We must act, and be seen to act, in a way that is honest and transparent.

This Policy supports existing partnership policies and standards, reinforcing TT Cables' commitment to foster an organizational culture in which there is zero tolerance for corruption. It further clarifies standards of conduct for the prevention of corruption and provides a common foundation for the development of procedures to manage TT Cables' corruption risk.

## ○ POLICY STATEMENT

1. Corruption on the part of any TT Cables employee, management or board member (collectively "TT Cables Persons") or any third party (consultant, Customer, Supplier partners, etc.) in their engagement with TT Cables entities, is prohibited.
2. No TT Cables Person, or any third party acting on behalf of TT Cables or dealing with TT Cables, shall offer to pay a bribe, or pay a bribe, nor shall they solicit the payment of a bribe, or accept a bribe in conjunction with any aspect of TT Cables' activities.
3. Payments otherwise prohibited should be considered only if there is immediate threat to personal safety in which case the payment must be immediately reported to management and clearly identified in the accounting records as such.
4. All TT Cables entities will develop a corruption aware workforce and foster an organizational culture in which corruption is never acceptable.
5. All TT Cables entities will ensure employees, management, board members, and third parties that engage with TT Cables are made aware of the Anti-Corruption Policy.

6. All TT Cables entities will implement a “whistleblower” policy and procedures to provide employees, managers, board members, and third parties with a mechanism to report evidence of misconduct, including corruption, and to encourage such reporting.
7. All TT Cables entities will document how incidents will be investigated, reported and closed in accordance with other internal regulations.
8. Employees of TT Cables who commit a corrupt act, fail to report knowledge of corruption or fail to manage the risk of corruption will be subject to disciplinary action up to and including termination of employment. Members of the Board who fail to comply with this Policy are subject to removal. Third parties who fail to comply with this Policy will have their agreements and/or contracts with TT Cables terminated. TT Cables may also seek restitution or prosecution or other legal remedies.

## ○ SCOPE

Each entity of TT Cables will ensure that it implements this Policy either by referencing it directly, or by adopting its own local policy which is in accordance with this policy and any management policy that supports it.

## ○ DEFINITIONS

Corruption is defined as ‘the abuse of entrusted power for gain’. It includes practices such as bribery, fraud, extortion, collusion and money laundering. It also includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the company’s activities. This may include cash or in-kind benefits, such as free goods, gifts, and holidays, or special personal services provided for the purpose of an improper advantage or that may result in moral pressure to receive such an advantage. Occasional minor gifts and entertainment should be handled in accordance with other related policies.