



**Turtle Dove Cambridge Community Interest Company**

**Anti-Bribery and Corruption Policy**

**Reviewed: May 2025**

**Review due: February 2026**



## **Introduction**

In the spirit of transparency and honesty, we are committed to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships.

## **Scope**

This policy applies to all individuals working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

## **What is Bribery**

A “**Bribe**” means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust, or improper in any way. Bribes can take the form of money, kickback, gifts, loans, fees, hospitality, services, discounts, the award of a contract, or any other commercial or personal advantage or benefit.

“**Bribery**” includes offering, promising, giving, accepting or seeking a bribe.

All forms of Bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your line manager or a Turtle Dove Cambridge Director.

Specifically, you **must not**:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- accept any offer from a third party that you know, or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure (even if these payments are common in certain countries); or
- threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.



## **Gifts and Hospitality**

This policy does not prohibit giving or accepting reasonable and appropriate hospitality (including meals, drinks, or other activities) for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services. Further details can be found in the TDC Gifts and Hospitality Policy.

## **Record Keeping**

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

## **Who is responsible for this policy?**

TDC's Board of Directors has overall responsibility for ensuring this policy complies with TDC's legal and ethical obligations, and that all those under our control comply with it. A member of the Board of Director has been nominated as responsible for compliance, and can be reached at [compliance@turtledovecambridge.com](mailto:compliance@turtledovecambridge.com).

The TDC Board of Directors has primary responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and reviewing internal control systems and procedures to ensure they are effective in countering bribery and corruption.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

This policy will be reviewed regularly, and we may amend it at any time to update with best practices and processes.

All employees, Directors, volunteers and people associated with TDC must ensure that they have read, understood and comply with this policy.

Preventing, detecting, and reporting bribery in any part of our business or supply chains is the responsibility of those working for TDC or under our control.



### **Reporting non-compliance with this policy**

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur in the future, you must notify your manager or the Board of Directors as soon as possible.

You are encouraged to raise concerns about any issue or suspicion of bribery in any parts of our business or supply chains at the earliest possible stage.

If you are unsure about whether a particular act constitutes any of the various forms of bribery, raise it with your manager or the Board of Directors.

TDC aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that bribery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Managing Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally with the Managing Director or the Board of Directors.

### **Communication and awareness of this policy**

Training on this policy, and on the risk TDC faces from bribery, forms part of the regular training for TDC employees, Directors and volunteers.

TDC's commitment to addressing issues of bribery in its business and supply chains should be communicated to all suppliers, contractors and business partners at the outset of any business relationship with them and reinforced as appropriate thereafter.

### **Breaches of this policy**

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.



TD may terminate its relationship with other individuals and organisations working on TDC's behalf if they breach this policy.