

## **Ethical Business Policy Statement**

*This policy forms part of Trans Global Projects (TGP) commitment to its core business principles set out in the Sustainability Policy*

### **Introduction**

TGP delivers project logistics services worldwide. Necessarily, this means it operates in a wide range of communities, with differing legal and ethical standards. TGP has made a commitment to consistently implement the highest standards in its business operations, wherever services take place.

### **Legal Compliance**

TGP operations span international borders and cross into many legal jurisdictions. TGP maintains a detailed understanding of import, export restrictions and requirements as a key element of its services and is committed to ensuring full compliance with these laws and regulations.

All activities are to be completed in line with the letter and spirit of local and international legislation and with any UK legislation designed to regulate the conduct of UK companies abroad.

### **Prevention of Corrupt Practices**

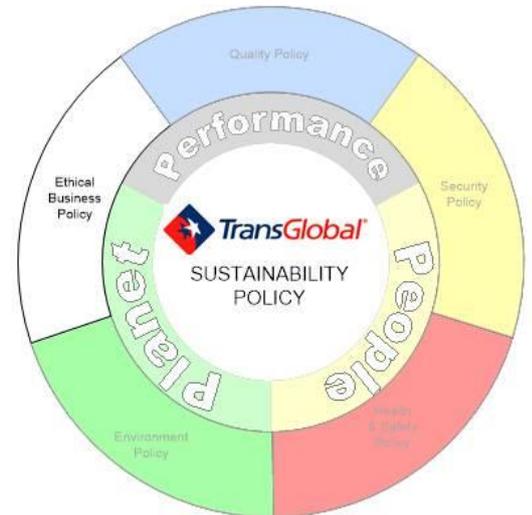
As a point of principle, TGP is committed to neither offer, accept nor acquiesce to any form of bribery or inducement payment. Procedures and financial record keeping disciplines are implemented to ensure that deviations from this policy will be readily detectable and subject to investigation, disciplinary action and / or reporting to the relevant authorities. Every business activity is undertaken in strict compliance with the UK Bribery Act 2010 and the detailed Anti-Corruption and Bribery Policy that regulates all conduct as a condition of employment.

### **Confidentiality & Privileged Information**

As a key supplier to support infrastructure projects, TGP is often privy to information that is confidential or commercially sensitive in itself or by virtue of the company's early receipt of this information. The company is also conscious of the need to prevent individuals securing an advantage from this information (including, but not limited to, trading based on the implications of advanced knowledge). As a principle of good business, the company will observe commercial confidentiality, refrain from unethical use of confidential information and ensure that its employees and partners do the same.

### **Human Rights and Workplace Standards**

Wherever TGP employs individuals or work is completed on its behalf, this shall be performed, as a minimum, in conformity with basic workplace principles. All labour shall be through a free and equitable partnership, with the workforce able to earn a living wage in a safe workplace where they are free from discrimination. TGP will not tolerate child labour, modern slavery or any unfair limitations on a workforce's freedom of assembly or organisation – either in its own operations or those of the companies it engages – and ensures that these standards are applied consistently.



Health & safety provisions shall be consistent with UK legislation and industry best practice, irrespective of whether local legislation requires this. Where local legislation contradicts, the higher standard shall be applied.

### **Community Impact Management**

As part of its commitment to sustainable, environmentally-responsible, business practice TGP works to prevent negative impacts on the communities touched by its operations. This starts with a community impact element to applicable environmental impact assessments and environmental risk assessments. TGP is committed to providing appropriate points of contact for communities to raise concerns and to taking an open, active and responsible approach to addressed issues raised.

### **Implementing Its Principles**

These principles will be embedded in all applicable procedures or working practices that TGP introduces. They will also be reflected in the decision making and operational prioritisation of the company's managers and staff.

Where TGP instructs other companies to act on its behalf, they shall not be used as a vehicle to subvert this policy. Wherever possible, TGP shall attempt to require or inspire its suppliers, local agencies and sub-contractors to work to TGP's values.

### **Monitoring & Auditing**

The values contained in this policy, and detailed procedures that embody them, shall be subject to regular ongoing monitoring and audit, as would any element of TGP management system. Where feedback or adverse occurrence investigation indicates that standards in operation have not conformed to these aspirations, action shall be taken to improve performance and prevent a recurrence of the issue observed.

### **Reporting**

The company's performance in meeting the aspirations of this policy shall be reported to its senior management via the Management Review process, as an equal alongside quality, environmental and health & safety performance.

The company will use its publically available channels for reporting, particularly its public web site, to ensure that it provides accurate, meaningful and useful information to all stakeholders about its achievements in pursuit of this policy.

A handwritten signature in blue ink, appearing to read "C. Charnock".

Colin Charnock, Group Managing Director  
30/01/2017