



Anti-Bribery and Anti-Corruption Policy

Last updated Jul 2025

1. Purpose

The purpose of this policy is to ensure that TCS conducts its business in an honest and ethical manner. We are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships, particularly with our suppliers and workers in China.

2. Scope

This policy applies to all employees, officers, consultants, contractors, suppliers, and any other third parties who perform services for or on behalf of TCS.

3. Definition of Bribery

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for an action which is illegal, unethical, or a breach of trust. This can include cash, gifts, hospitality, or other benefits.

4. Definition of Corruption

Corruption is the abuse of entrusted power for private gain. It can take many forms, including bribery, fraud, extortion, and embezzlement.

5. Policy Statement

- TCS has a zero-tolerance approach to bribery and corruption.
- Employees and associated persons must not engage in any form of bribery or corruption, whether directly or through third parties.
- Any breach of this policy will result in disciplinary action, which may include termination of employment and legal action.

6. Gifts and Hospitality

- Employees must not accept or offer gifts, hospitality, or other benefits that could influence, or be perceived to influence, business decisions.
- Any gifts or hospitality received or offered must be reported to the Managing Director.

7. Suppliers and Workers in China

- All suppliers and workers in China must comply with this anti-bribery and anti-corruption policy.
- Suppliers must ensure that their employees and subcontractors do not engage in any form of bribery or corruption.



- Regular audits and assessments will be conducted to ensure compliance with this policy.
- Any supplier found to be in breach of this policy will face termination of their contract and potential legal action.

8. Responsibilities

- All employees are responsible for reading, understanding, and complying with this policy.
- Managers are responsible for ensuring that their teams are aware of and adhere to this policy.
- The Head of Purchasing is responsible for monitoring compliance with this policy and providing guidance and training.

9. Reporting Concerns

- Employees and suppliers are encouraged to report any concerns or suspicions of bribery or corruption to the Head of Purchasing.
- Reports can be made confidentially and without fear of retaliation.

10. Monitoring and Review

This policy will be reviewed annually by the Head of Purchasing to ensure its effectiveness and compliance with legal requirements.

Jul 2025

Review Date: Jul 2026