

## **TBVI INTEGRITY POLICY**

### Policy Statement

It is TBVI's policy to act with integrity and high ethical standards in all its business dealings, and to have a framework in place to guide employees and all who act on behalf of the Foundation to ensure these standards are upheld.

### Purpose

The purpose of this Policy is to ensure that employees and those who act on behalf of the Foundation do so in a manner that is consistent with the Foundation's stated values.

### Scope

This policy applies to all Directors and employees of the Foundation and to all contractors who act for and on behalf of the Foundation in its business dealings and relationships with the community at large

### Policy outline

TBVI employees, and those who act on behalf of the Foundation, have an obligation to conduct business consistent with the Foundation's values.

The values include the following:

#### Integrity

High standards of ethical behaviour, 'we do what we say'. We behave with honesty and transparency, take responsibility and accountability, aim to trust and be trusted.

It is not acceptable for employees or those acting on behalf of the Foundation to seek to obtain advantages for themselves, relatives or close friends, or other related parties, that are improper or in any way harm the Foundation's interests or reputation. Where actual or perceived conflicts of interest arise, these should be declared in accordance with the processes set out below.

#### Conflicts of Interest

See the separate TBVI Conflicts of Interest Policy

#### Bribery and Corruption

Improper payments, gifts or favours promised or offered may constitute bribery and corruption:

- If it is illegal;
- If it creates an obligation or perception of obligation on either party;
- If it cannot be transacted transparently;
- If it is unreasonable or excessive in terms of value or frequency;
- If the intention of the payment, gift or favour is to obtain undue personal or business advantage, or to encourage others to refrain from acting in the performance of their duties, or to willingly refrain from performing your own duties;
- If exposure is likely to cause embarrassment to the individual concerned or to the Foundation.

In giving effect to this policy, we will not promise, offer, or accept improper payments to, through or from any person or organisation with whom we conduct business. We will not seek to influence other parties to offer or accept improper payments whether on our behalf or otherwise. This includes, but is not limited to, customers, agents, suppliers, contractors, joint venture partners, subsidiaries, labour unions, government or regulatory agents and officials, offer philanthropic donations, community investment or political contributions to try to obtain or retain undue personal or business advantage or to refrain or encourage others from performing their duties.

## Gifts

The acceptance of gifts may sometimes give rise to apparent or potential conflicts of interest, as the receipt of gifts could be seen as a possible source of influence in the way a person conducts business on behalf of the Foundation.

As a general rule, we should not accept any gift of significant value from outside interests in connection with the performance of our role with the Foundation Energy. This includes gifts from vendors, suppliers, contractors, consultants, and other like organisations.

As a guide, gifts that may be in excess of Euro 100 in value should not be accepted. Where there are cultural or significant business reasons for accepting a gift of significant value you should inform the executive director and obtain the permission to accept the gift. Where such a gift is accepted it should be shared generally across the Foundation or donated to a charity of the Foundation's choosing. If acknowledgement is required, this should be given on behalf of the Foundation and not the individual employee.

Letters of acknowledgement or thank you should be written on Foundation letterhead and a copy should retain on a register of gifts accepted by employees.

Gifts include material items, services, accommodation, tickets to events and so forth.

If an employee believes there is an appropriate reason why an exception should be made regarding the acceptance of gifts, then they should make those reasons known to the executive director. This request for an exception should be made before any gift is accepted wherever possible.

## Political Contributions

No person will make any financial or in kind contribution to a political party on behalf of the Foundation. Any contributions or benefits extended to a political party will be authorised by the Governing Board.

## Responsibility/Authority

It is the responsibility of the executive director to endorse, communicate and deploy this Policy, and for ensuring that all employees and contractors are aware of, understand, and comply with the Foundation policy.