

"Maintaining integrity, accountability, and transparency standards in all activities"



Updated on 4 March 2023

# **Application**

This policy outlines the company's commitment to conducting its business ethically, legally, and transparently. The company prohibits any form of bribery, fraud, or corruption, whether involving public officials, private entities, or individuals. The company expects all its employees, directors, officers, contractors, consultants, agents, partners, and representatives to comply with this policy and the applicable laws and regulations in the countries where the company operates.



### **Definition**

Bribery is the offering, promising, giving, accepting, or soliciting of any benefit, whether directly or indirectly, to or from any person or entity to influence their actions or decisions in favor of the company or to obtain or retain an improper advantage. Fraud is the intentional deception or misrepresentation of facts for personal gain or to cause loss or harm to others. Corruption is the abuse of entrusted power for private benefit.



## **Zero Tolerance**

TSC Global maintains zero-tolerance approach to bribery, fraud, and corruption. Any employee who engages in or facilitates such conduct will be subject to disciplinary action, up to and including termination of employment. The company may also report such behavior to the relevant authorities and cooperate with investigations. The company may also terminate its relationship with any third party violating this policy or engaging in unlawful or unethical conduct.



# Reporting

 TSC Global requires all its employees and third parties to report any actual or suspected incidents of bribery, fraud, or corruption involving the company or its business activities. The company provides a confidential and anonymous reporting mechanism through its Ethics Hotline and encourages anyone concerned to raise it without fear of retaliation. The company will protect the identity and rights of anyone who reports in good faith and will not tolerate harassment, intimidation, or victimization.



## **Our complaints process**



The TSC Global whistleblower officer based in Corporate HQ, Singapore, is responsible for receiving, acknowledging, assessing, and investigating the reports promptly and professionally. The whistleblower officer will also provide regular updates to the whistleblower on the progress and outcome of the investigation, subject to legal and confidentiality constraints.



# Our Commitment

TSC Global is committed to implementing and maintaining effective controls and procedures to prevent, detect and respond to bribery, fraud, and corruption risks. The company provides regular training and guidance to its employees and third parties on this policy and their responsibilities under it. The company also monitors and audits compliance with this policy and the applicable laws and regulations and reviews and updates this policy as necessary.



### **TSC Global Limited**

**New Zealand** 

Registered Office L3, Southbloc, 19 Know Street Hamilton 3244

Mekong Regional Office
230D Street 21 CA2, Khan Mean
Chey, Phnom Penh
Cambodia

#### www.tsc.dev

Head Office #02-21, 756, Bedok Reservoir Road, 479259 Singapore

South Asia Office S-85, II Floor, Greater Kailash Part II, New Delhi, Delhi 110048 India

### info@tsc.dev

Central Asia Regional Office
CSI, BC, 10th Floor, 2 Kunayev
Street, Astana 010000
Kazakhstan

East Africa Office
Unit 9 A, Selengei Villas, Ongati
Rongai, Nairobi **Kenya** 

East Asia Regional Office 102, Building 46-B, Dund Gol St Ulaanbaatar 17031 Mongolia

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