

## Ethical Policy of TFC Europe Ltd

### Purpose

This policy has been created to provide a framework and guidance on the company's approach to achieving and maintaining good business behaviour through sound ethical conduct. It ensures that all employees are aware of their individual and collective responsibilities regarding the company's ethics and emphasises our employees' and customers' expectations of being treated fairly and in accordance with good business practices.

All employees are responsible for reading this document in its entirety and for ensuring that they comply with all the policy requirements as stated within this document.

This policy aims to maintain a culture of openness, trust, and integrity in the company's business practices. Effective ethics is a 'team effort' involving the participation and support of every **TFC Europe Ltd** employee.

TFC Europe Ltd is committed to protecting employees, business partners and suppliers from illegal or damaging actions by individuals, knowingly or unknowingly. When **TFC Europe Ltd** addresses issues proactively and users correct judgement. It will help to set the company apart from its competitors and help further enhance its reputation.

**TFC Europe Ltd** will not tolerate any wrongdoing or impropriety at any time. The company will take the appropriate measures and act quickly when the 'ethical code' is broken.

### Scope

This policy applies to all employees, contractors, consultants, and part-time employees of **TFC Europe Ltd**.

### Policy

TFC Europe Ltd Board's commitment to ethics:

- That integrity is one of the company's core values
- To set and lead by example. In any business practice, honesty and integrity are of the highest importance.
- Have an open-door policy and welcome suggestions and concerns from all employees. This creates an environment that will allow employees to feel comfortable discussing issues and will serve to alert Directors to concerns within the company.

Employee's commitment to ethics

- To disclose conflicts of interest regarding their position with the company
- To engage in carrying out the company's mission in a professional manner and in line with the core values of the company, which includes integrity.
- To recognise that the primary function of the company is always to serve the best interests of its current and future customers and to do this with respect, concern, courtesy, and responsiveness.
- Treat everyone fairly, have mutual respect, promote a team environment, and avoid the intent and appearance of unethical or compromising practices.
- To treat all persons with respect and consideration, regardless of race, religion, gender, sexual orientation, maternity, marital or family status, disability, age, or national origin
- To respect the structure and responsibilities of management, provide them with facts and advice as a basis for decision and policymaking, and uphold and implement decisions and policies adopted by management.
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- To demonstrate the highest standards of personal integrity, truthfulness, and honesty in all activities to inspire confidence and trust in such activities, both internally and externally
- To strive for personal and professional excellence, encourage the professional development of others and keep up to date on emerging issues affecting the company.
- To always conduct themselves with professional competence, fairness, and impartiality

#### Company's Commitment to Ethics

- To hold paramount the safety, health, and welfare of the public in the performance of the company's professional duties
- To keep the local communities informed about issues which may affect them.
- To collaborate with and support partners in carrying out the company's mission and online with the company's ethics policy
- To build professional reputations on the merit of our capabilities and refrain from competing unfairly with others
- Not to engage in any business practice or process or with any entity, including potential customers, that does not match the Company's ethical standards.

## Governance and review

If an employee is in doubt about a relevant course of action, requires clarification on a particular issue, or wants to report a potential breach of **TFC Europe Ltd's** ethical code, they should report directly to their line manager/Director. The topic/issue will then be dealt with as quickly and efficiently as possible by the president if appropriate.

The Directors have overall responsibility for all ethical matters. The operation of this policy and the associated procedures will be monitored and reviewed regularly to ensure that they remain current and applicable to **TFC Europe Ltd's** activities. This policy has been endorsed by the Board of Directors who give their full support to the implementation of the policy.

Signed :- 

Name :- Keith Kentish

Title:- Regional Vice President

Date :- 12 February 2024