

Team Defence Information

Facilitation Payments Policy

1. Introduction

This Facilitation Payments Policy outlines the principles and guidelines that employees of UKCeB trading as Team Defence Information must adhere to regarding facilitation payments. This policy aims to ensure transparency, integrity, and compliance with legal and ethical standards in all business interactions.

2. Scope

This policy applies to all employees, including full-time, part-time, temporary, and contractors, as well as consultants and agents acting on behalf of UKCeB trading as Team Defence Information.

3. Policy

3.1. Definition:

Facilitation payments, also known as "grease payments" or "expediting payments," are small payments or gifts made to government officials or individuals to expedite routine government actions or services that the payer is legally entitled to.

3.2. Prohibition:

- UKCeB trading as Team Defence Information
- strictly prohibits the offering, giving, solicitation, or acceptance of facilitation payments in any form, directly or indirectly, by any employee or representative of the company.
- Employees must not make, authorize, or participate in any facilitation payments, regardless of the country or jurisdiction in which they operate, even if such payments are customary or expected in that region.

3.3. Reporting:

- Any employee who becomes aware of a facilitation payment or an attempt to solicit such a payment must report it immediately to their immediate supervisor, Human Resources, or the designated compliance officer.
- Reports of facilitation payments will be thoroughly investigated, and appropriate disciplinary action will be taken against employees found to have violated this policy, which may include termination of employment.

3.4. Training and Awareness:

- UKCeB trading as Team Defence Information will provide regular training and awareness programs to educate employees about this policy, the risks associated with facilitation payments, and the importance of adhering to legal and ethical standards in all business dealings.

4. Compliance and Enforcement

- Violations of this policy may result in disciplinary action, up to and including termination of employment.
- Employees are encouraged to seek guidance from their supervisor, Human Resources, or the designated compliance officer if they are unsure about the appropriateness of a payment or gift in a particular situation.

5. Policy Review

- This policy will be reviewed periodically and updated as necessary to ensure its effectiveness and compliance with applicable laws and regulations.

6. Acknowledgment

- All employees are required to read, understand, and acknowledge their compliance with this Facilitation Payments Policy upon joining the company and periodically thereafter.

7. Conclusion

- UKCeB trading as Team Defence Information is committed to conducting business with integrity, honesty, and transparency. This Facilitation Payments Policy is designed to uphold these values and ensure that all business interactions are conducted in an ethical and compliant manner.

Amendment Record

Date	Detail
1 Oct 21	V1.0 - Initial version
1 Oct 22	V2.0 - Reviewed
1 Oct 23	V3.0 - Reviewed
1 Oct 24	Reviewed
30 July 25	Reviewed
3 Aug 26	Reviewed