

Policy for Working with Partnerships/Third Parties

This policy applies to all employees of C.S. Todd & Associates Ltd (CSTA). It provides guidance on establishing and monitoring relationships with business partners (referred to as “third parties”) and managing bribery and corruption risk related to business dealings with them.

CSTA commits to acting with integrity in all business activities, complying with applicable laws and regulations. Business partners are expected to abide by ethical principles compatible with CSTA’s own. CSTA does not tolerate illegal or unethical actions.

Due Diligence

Before engaging with a third party, we conduct thorough due diligence. This includes assessing their reputation, financial stability, compliance history, and alignment with our ethical standards.

We verify their legal status, ownership structure, and any potential conflicts of interest.

Contractual Agreements

Where necessary, we establish clear contractual agreements with third parties. These agreements outline expectations, responsibilities, and compliance requirements.

Key provisions include confidentiality, anti-bribery, anti-corruption, data protection, and intellectual property rights.

Monitoring and Auditing

We periodically review third-party relationships to ensure ongoing compliance.

Audits may include feedback received from staff, document reviews, and meetings with third-party representatives.

Escalation and Remediation

If issues arise, we escalate them promptly to the SMT. Remediation measures may include contract amendments, termination, or legal action.

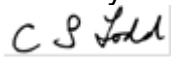
C.S. Todd & Associates Ltd

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Certificate Number 860
ISO 9001

Date:	31 st July 2024
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