

TI-UK Anti Bribery & Corruption Risk Register and KPI's

Updated: August 2025

Risk	Mitigation	Responsibility
<p>1. <u>Gifts & Hospitality</u> The risk that our people do not disclose gifts and hospitality or that breaches of the policy are not being identified.</p>	<ul style="list-style-type: none"> • Policy on Gifts and Hospitality included within Induction training • Quarterly reminder sent to all employees to update register • Register reviewed by COO 	<p>People Team COO</p>
<p>2. <u>Overseas Travel</u> The risk that employees participate in facilitation payments whilst undertaking travel overseas</p>	<ul style="list-style-type: none"> • Policy highlights risks related to facilitation payments and overseas travel • Anti-Bribery and Corruption Induction training contains a section related to this risk area 	<p>People Team People Team</p>
<p>3. <u>Donations</u> The risk that a donor may seek to compromise TI-UK's independence by influencing improperly the policies, activities or decision-making of TI-UK.</p>	<ul style="list-style-type: none"> • Donor Due Diligence review for all new donors, reviewed by SLT and for larger sums by the Finance, Risk & Audit Committee in advance of agreement to accept funds • Policy and due diligence checks published on web-site. 	<p>Fundraising</p>
<p>4. <u>Conflicts of Interest</u> The risk that our people do not disclose potential conflicts of interest</p>	<ul style="list-style-type: none"> • Board & Committee meetings have standing item • Board and Senior Employees Register in place and publicly available on web-site • Policy in place and included within appointment process, induction and quarterly performance system 	<p>Board Chair / Committee Chairs Company Secretary People Team</p>
<p>5. <u>Research Activities</u> The risk that research results and the means of publication are compromised by external interests.</p>	<ul style="list-style-type: none"> • Content Creation policies are in place to document the review and scrutiny of public statements in advance of publication. SLT and Board input are captured in the process. 	<p>Programmes / Communications</p>
<p>6. <u>Appointments and activities of consultants</u> Risk that the high number of consultants engaged to undertake TI-UK activities across the globe could engage in anti-bribery and corrupt practices.</p>	<ul style="list-style-type: none"> • Consultant vetting as part of appointment process. • Contractual arrangements require adherence to TI-UK's anti-bribery and corruption policy and procedures and they receive appropriate training; TI-UK's contracts with them allow for 	<p>Programmes</p>

	termination of a relationship in the case of a breach of TI-UK's anti-bribery policy.	
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	Anti-Corruption & Bribery KPI	Risk	2021 (to June)	2022 (to Sept)	2023 (to August)	2024 (to August)	2025 (to August)
a.	Percentage of new joiners who have signed Code of Conduct	1-6	100%	100%	100%	100%	100%
b.	Percentage of new joiners who have completed mandatory Anti-Corruption & Bribery training	1-6	In-person training resumed in June 2022 for new starters recruited during Covid lock-down period for 10 new starters		13 new joiners completed training	9 new joiners training	2 new joiners (training o/s)
c.	Number of Anti-Corruption & Bribery Policy Breaches Identified	1-6	Nil	Nil	Nil	Nil	Nil
d.	Percentage of Gifts and Hospitality Register items that are non-compliant	1	0%	0%	0%	0%	0%
e.	Number of Reported Incidents / Whistleblowing related to Anti-Corruption & Bribery	1-6	Nil	Nil	Nil	Nil	Nil
f.	Number and value of New Donor funds not subject to due diligence	3	Nil / £0	Nil/ £0	Nil/ £0	Nil/£0	Nil/£0