

# Greencarrier anti-bribery and corruption policy

## Human Rights

The **purpose** of this document is to set out the firm's policy in relation to bribery and corruption. The policy applies strictly to all employees, directors, agents, consultants, contractors and to any other people or bodies associated with the Greencarrier Group, within all regions, areas and functions.

The policy is aimed at:

- Guide in the usage of gifts, remuneration and other benefits
- Clarify what is accepted and not accepted methods for conducting business

## Understanding and recognising bribery and corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

It is Greencarrier's policy to conduct business in an honest way, and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. We will not tolerate bribery or corruption in any form.

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- Normal hospitality
- Fast tracking a process which is available to all on the payment of a fee; and/or

- Providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only.

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to your Head of Department. If necessary, guidance should also be sought from the Group CEO or Group CFO.

The firm will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

**Definition:**

**Bribery** is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical or a breach of trust.

**Corruption** is the misuse of public office or power for private gain; or misuse of private power in relation to business outside the realm of government.

Below are the key areas you should be aware of in particular:

**Hospitality, Gifts, Entertainment:** can be used to exert improper influence on decision makers. Gifts, entertainment and hospitality are acceptable provided they can be considered normal business practice.

**Use of business partner:** can be used by individuals for personal benefit as opposed to benefit for the Group

**Travel** – regulation of customer's travels to customer events and company employees' travels to supplier meetings.

**Sponsoring** – can equal bribing when it's excessive in relation to what benefits can be obtained in the foreseeable future.

**Rebates and bonuses** – company employees can sometimes receive privately rebates and bonuses.

**Employee responsibility and how to raise a concern**

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the firm. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this to your superior and if necessary, the Group CEO or Group CFO.

April 2024

I confirm that I have read and understood this Greencarrier Anti-Bribery and Corruption Policy.

I also confirm that I have understood the requirements of the Anti-Bribery and Corruption Policy and my responsibilities in relation to this document. I understand that if I am party to any breach of Anti-Bribery and Corruption Policy then it could be regarded as Gross Misconduct and that this may result in disciplinary action, up to and including dismissal.

-----, (signature, date and company)