

ANTI-BRIBERY AND CORRUPTION POLICY

Policy statement

It is the policy of g2 Energy to conduct all of our business in an honest and ethical manner. As part of this, we take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and implementing and enforcing effective systems to counter bribery and corruption.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by UK laws, including the Bribery Act 2010, in respect of our conduct both at in the UK and abroad.

Definitions

A bribe is an inducement or reward offered, promised or provided in order to improperly gain any commercial, contractual, regulatory or personal advantage, which may constitute an offence under the Act, namely:

- giving or offering a bribe;
- receiving or requesting a bribe; or
- bribing a foreign public official

The company may also be liable under the Act if it fails to prevent bribery by an associated person (including but not limited to Workers) for the company's benefit.

Corruption is the abuse of entrusted power or position for private gain.

About this policy

The purpose of this policy is to:

- set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- provide information and guidance to those working for g2 Energy on how to recognise and deal with bribery and corruption issues.

It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years imprisonment and/or a fine. As an employer if we fail to prevent bribery we can face an unlimited fine, exclusion from tendering for public contracts, and damage to our reputation. We therefore take our legal responsibilities very seriously.

Who must comply with this policy

This policy applies to all persons working for or on behalf of g2 Energy in any capacity, including employees at all levels, directors, officers and associates whether permanent, fixed-term or temporary, and wherever located, including agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person who performs services for or on behalf of g2 Energy (collectively referred to a **workers** in this policy).

In this policy, **third party** means any individual or organisation you come into contact with during the course of work and the running of the Company's business, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies (including their advisors, representatives and officials), politicians and political parties.

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What is and what is not acceptable

It is not acceptable for any worker (or someone on their behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that they or the company will improperly be given a business advantage, or as a reward for a business advantage already improperly given
- give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome
- accept a payment, gift or hospitality from a third party that you know, or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return
- give, promise to give, or offer, a payment, gift or hospitality to or from government officials or representatives, or politicians or political parties to facilitate or expedite a routine procedure
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy
- engage in any other activity that might lead to a breach of this policy

Facilitation Payments

g2 Energy do not make, and will not accept, facilitation payments of ‘kick-backs’ of any kind.

Facilitation payments also known as “back-handers” or “grease payments”, are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official).

Kickbacks are typically payments made in return for a business favour or advantage.

Gifts, Hospitality

This policy allows for reasonable giving or accepting of gifts and hospitality, with clear limits outline within Gifts and Hospitality Policy.

Reasonable and appropriate hospitality may be offered or received for the purposes of:

- establishing or maintaining good business relationships
- improving or maintaining the company image or reputation
- marketing or presenting company products and/or services effectively

The giving and accepting of gifts is allowed if it complies within the limits of Gifts and Hospitality Policy, is appropriate for the time or circumstance (ie. Christmas) and is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.

Charitable donations and sponsorship

g2 Energy only makes charitable donations and sponsorship that are legal and ethical under local laws and practices.

Employee responsibilities and raising concerns

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for g2 Energy or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

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g2 Energy Limited, 1 Osier Way, Olney Office Park, Olney, Buckinghamshire. MK46 5FP

T: 01234 482482 | W: www.g2energy.co.uk

Registered in England no. 05840192 | VAT no. 321 1620 60

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Workers are required to notify g2 Energy as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, or if they are offered a bribe, are asked to make one, or suspect that any bribery, corruption or other breach of this policy has occurred or may happen in the future, or believe that they are a victim of another form of unlawful activity.

How to raise a concern

If you are offered a bribe, or are asked to make one, or if you believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your Line Manager or report it in accordance with the Whistleblowing Policy as soon as possible.

Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, may worry about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Training and communication

This policy shall be communicated to all employees directly employed by g2 Energy as part of the employee induction process, and additional training will be provided as necessary.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

Record keeping

g2 Energy shall keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made.

Monitoring and reviewing

g2 Energy shall monitor the effectiveness and shall review the implementation of this policy at appropriate intervals. Any improvements identified are made as soon as possible. Internal control systems and procedures are also subject to regular review to provide assurance that they are effective in countering any risks of bribery and corruption.

Other policies

g2 Energy operates other policies that support this policy:

- Gifts and Hospitality Policy
- Whistleblowing Policy
- Criminal Finances Act Policy
- Supplier PQQ Procedure
- Tendering Procedures
- Recruitment and Employment Procedure

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

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