



Anti-Bribery and Corruption Policy

Over the years, the company has implemented a variety of policies and procedures to guide employees and Directors within and outside the organisation for efficient functioning in a transparent, ethical, and sustainable manner. These systems have been designed to ensure officers of the company plan and deal with transactions for customers and potential customers in a transparent and consistent manner.

Anti-bribery and corruption form an integral control mechanism which is enshrined within the company's operating plan and ethical business operating policy.

Any member of staff who experiences directly or indirectly assumed bribery or corruption or has legitimate business concerns is encouraged to report knowledge to a manager without delay. Such reports are treated confidentially and robustly investigated.

Understanding

Any member of staff found to solicit, extract, coerce or gain benefit from bribery or corruption will be subject to disciplinary actions which could result in dismissal. The policy is applied to Directors and filters down to all employees without favour. It applies equally to customers and potential customers, suppliers and potential suppliers.

Responsibility

The Company Director is responsible for overseeing the implementation of this policy. Managers are responsible for implementation across service lines and procurement of goods and services. Employees are responsible for following the letter and spirit of the policy.

Key elements

Greenlight employees are expected to act with absolute honesty, integrity, fairness and transparency at all times;

The company adheres to The Bribery Act 2010 which states that companies can be prosecuted for both active bribery (offering a bribe) and passive bribery (requesting or accepting a bribe), with sentences of unlimited fines and potential imprisonment;

Bribery extends beyond handling and management of cash – it includes gifts, hospitality and entertainment which are non-educational, go beyond relationship building and could be construed as intended to influence a decision or business transaction;



Bribery is defined as offering, promising or giving a financial or other inducement / reward to a person / company which may be improper, an abuse of power or corporate funds and may include but is not limited to bribery;

Corruption is defined as any form of abuse of entrusted power for private gain;

Bribery and corruption as defined is not how Greenlight wishes to conduct or transact business or build relationships with customers, potential customers, suppliers and employees;

Not only is bribery and corruption illegal and immoral, it is seen to be damaging to company reputation and will not be tolerated in any form;

Normal hospitality and relationship building with customers, potential customers, suppliers and partners is not considered unsafe.

Greenlight will always be available to advise an employee about a particular concern related to full compliance with The Bribery Act.

Risk assessment

Greenlight does not believe that its business activities possess a high risk of corruption or acts of bribery:

Large contracts and business transactions are generally governed by a tender process and subject to rigorous anti-corruption procedures;

Very large offers are not bid through tenders and tend to involve multiple members of the senior management team;

Where possible, we try to standardise pricing and this assists us in identifying unorthodox or unusual sales activity;

Sales activity is monitored by internal accountants and the senior management team on a rolling basis.



Perceived risk areas

The following represent potential risk areas we are aware of and focus on with our employees

Excessive gifts, entertainment, and hospitality (all need to fall within the company's approved Corporate Policy);

Facilitation payments (fast track payments are only necessary sometimes to expedite a service or supply or because credit terms may demand pre-payment);

Reciprocal agreements (a 'quid pro quo' is not acceptable unless it represents a legitimate, open business arrangement which is properly documented and approved by senior management. Improper payments to obtain new business, or discounts to secure business or a competitive advantage should not be accepted or made;

Expenses – The Bribery Act permits genuine acts of hospitality and related expenses. However, employees are not permitted cash in advance and need to advance reasons for claimed expenses, justify decision-making, prove expenses and reclaim expenses within the business Corporate Policy;

Charitable donations are permitted (but only for businesses and individuals not linked to employees, or made in order to gain a commercial advantage);

Reporting

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the company. If an employee becomes aware or suspicious of an action or proposal, they have a duty to report it openly, directly and without delay. Any issues will be recorded by senior management as appropriate.

Garry Bygrave

Company Director