



# Anti-Bribery & Corruption Policy 2026

**Document Ref:** GTS-ABC-001

**Effective Date:** 1 January 2026

**Review Date:** 1 January 2027

## 1. Policy Statement & Commitment

GreenTech Scotland operates a zero-tolerance approach to bribery and corruption. We are committed to conducting all of our business in an honest, transparent, and ethical manner. We act professionally, fairly, and with integrity in all our business dealings and relationships, wherever we operate, and we are committed to implementing and enforcing effective systems to counter bribery.

We strictly uphold all laws relevant to countering bribery and corruption, specifically the Bribery Act 2010, in respect of our conduct both in the UK and internationally across our supply chains.

## 2. Scope of Policy

This policy applies to all individuals working at all levels and grades within GreenTech Scotland, including senior managers, directors, employees (whether permanent, fixed-term, or temporary), consultants, sub-contractors, agency staff, and any other person or supply chain partner providing services to us or acting on our behalf.

## 3. What is a Bribe?

A bribe is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory, or personal advantage. Under this policy, GreenTech Scotland personnel and representatives must never:

- Give, promise to give, or offer a payment, gift, or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- Give, promise to give, or offer a payment, gift, or hospitality to a government official, agent, or representative to "facilitate" or expedite a routine procedure.
- Accept payment from a third party that you know, or suspect, is offered with the expectation that it will obtain a business advantage for them.

#### **4. Gifts and Hospitality**

GreenTech Scotland recognizes that modest corporate hospitality is an accepted part of building B2B relationships. This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties, provided it is:

- Not made with the intention of influencing a third party to obtain or retain business or a business advantage.
- Given in the company's name, not in the individual's name.
- Appropriate in the circumstances (e.g., small promotional gifts like branded pens or reasonable business lunches).
- Transparently declared and recorded in the company's internal expenses system.

We strictly prohibit the offering or receiving of lavish or extravagant gifts or hospitality. Cash or cash equivalents (such as gift certificates or vouchers) must never be offered or accepted.

#### **5. Public Sector & Local Authority Tenders**

Given our work within the education and public sectors, GreenTech Scotland employees must exercise extreme caution when interacting with public officials, university estate teams, and local authority procurement managers. No gifts or hospitality of any kind may be offered to public officials during an active tender or procurement process.

#### **6. Facilitation Payments and Kickbacks**

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by GreenTech Scotland.

#### **7. Record Keeping & Financial Transparency**

GreenTech Scotland must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

All accounts, invoices, memoranda, and other documents and records relating to dealings with third parties (such as clients, suppliers, and business contacts) must be prepared and maintained with strict accuracy and completeness.

## **8. Raising Concerns (Whistleblowing)**

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If an employee is unsure whether a particular act constitutes bribery or corruption, or if they have any other queries, these should be raised with the Managing Director or the Chief Operations Officer.

GreenTech Scotland ensures that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offense has taken place or may take place in the future.

### **Signed on behalf of GreenTech Scotland:**

Jonathan William Travers

Managing Director

GreenTech Scotland

Date: 01/01/2026