	Title <h1 style="text-align: center;">Anti-bribery & Anti-corruption Policy</h1>	Document No.:	HR.POL.36
		Revision No.:	3
		Issue Date:	26.3.26

All employees and associated persons are required to comply with this policy in accordance with the Bribery Act 2010.

Green Frog Utilities Ltd is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy outlines the company's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. The organisation will not tolerate any form of bribery, of, or by, its employees, agents, consultants or any person or body acting on its behalf.

Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

Scope of this policy

This policy applies to all employees of Green Frog Utilities Ltd, and to temporary workers, consultants, contractors, agents, and subsidiaries acting for, or on behalf of, the company ("associated persons") within the UK and overseas. All the above-named are responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual, and criminal matter for the individual concerned and may cause severe damage to the reputation and standing of Green Frog Utilities Ltd.

Green Frog Utilities Ltd may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves with and comply with this policy, including any future updates issued by the organisation.

This policy covers:

- the main areas of liability under the Bribery Act 2010;
- the responsibilities of employees and associated persons acting for, or on behalf of, the organisation; and
- the consequences of any breaches of this policy.

Bribery Act 2010

Green Frog Utilities Ltd is committed to complying with the Bribery Act 2010 in its business activities in the UK and overseas.


Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the:

- intention of inducing or rewarding improper performance of a function or activity; or
- knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed during a person's employment, or on behalf of another organisation or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed under the Bribery Act 2010 if:

- an employee or associated person acting for, or on behalf of, the organisation offers, promises, gives, requests, receives or agrees to receive bribes; or

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- an employee or associated person acting for, or on behalf of, the organisation offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of their duties (where local law does not permit or require such influence);
- and the organisation does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

What is prohibited?

Green Frog Utilities Ltd prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or organisation, whether a public or government official, an official of a state-controlled industry, a political party or a private person or organisation, regardless of whether the employee or associated person is situated in the UK or overseas.

The bribe might be made to ensure that a person or organisation improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual, or regulatory advantage for the organisation in either obtaining or maintaining business or to gain any personal benefit, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example, through consultants, contractors or subcontractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

Records

Employees and, where applicable, associated persons, are required to take particular care to ensure that all records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers, and public officials.

Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement, or relationship with a potential supplier of services, agent, consultant or representative.

Employees and associated persons are required to keep accurate, detailed, and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

Corporate entertainment, gifts, hospitality, and promotional expenditure


Corporate entertainment, gifts, hospitality, and promotional expenditure are permitted by Green Frog Utilities Ltd, provided the criteria below are met:

- for the purpose of establishing or maintaining good business relationships;
- to improve the image and reputation of the organisation; or
- to present goods/services effectively;

provided that it is:

- arranged in good faith; and
- not offered, promised, or accepted to secure an advantage for the organisation or any of its employees or associated persons or to influence the impartiality of the recipient.

Green Frog Utilities Ltd will authorise only reasonable, appropriate, and proportionate entertainment and promotional expenditure. This principle applies to employees and associated persons, whether based in the UK or overseas.

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Green Frog Utilities Ltd will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship.

Green Frog Utilities Ltd will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence, or a particular business benefit was being sought (for example, before a tendering exercise).

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers, or other business contacts should be reported immediately to their line manager.

In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment,

for example, where there could be a real or perceived conflict of interest. As a rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by employees.

If an employee or associated person wishes to provide gifts to suppliers, clients, or other business contacts, prior written approval from their line manager is required, together with details of the intended recipients, the reasons for the gift, and the business objective. These will be authorised only in limited circumstances and will be subject to a cap of £50 per recipient.

Employees and, where applicable, associated persons must supply records and receipts in accordance with the organisation's expenses policy.

Charitable and political donations

Green Frog Utilities Ltd considers that charitable giving can form part of its broader commitment and responsibility to the community. Green Frog Utilities Ltd may support employee fundraising events.

Reporting suspected bribery

Green Frog Utilities Ltd depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and associated persons are requested to assist the organisation and to remain vigilant in preventing, detecting, and reporting bribery.

Employees and associated persons are encouraged to report any concerns they may have to the Managing/Operations Director as soon as possible.

Issues that should be reported include:

- any suspected or actual attempts at bribery;
- concerns that other employees or associated persons may be being bribed; or
- concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.

Green Frog Utilities Ltd will support employees or associated persons who report instances of bribery in good faith.

Green Frog Utilities Ltd will ensure that the individual is not subjected to detrimental treatment as a consequence of their report. Any instances of injurious treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence.

Competition Law & Tendering Behaviour

Green Frog Utilities Ltd is committed to complying with all applicable competition laws, including the Competition Act 1998, and promoting fair and open competition in the markets in which it operates.

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The Company strictly prohibits any form of anti-competitive behaviour, including:

- Price fixing or agreeing pricing with competitors
- Bid rigging, cover pricing, or collusion in tendering
- Market or customer allocation arrangements
- Sharing commercially sensitive information (such as rates, margins, or tender strategies) with competitors

Tendering Conduct

- All tenders are prepared independently, fairly, and without consultation with competitors
- Employees must not communicate with competitors regarding any aspect of a live or future tender
- All pricing and commercial decisions are based solely on internal data and market analysis
- Any attempt by external parties to influence tender outcomes must be reported immediately

Compliance & Reporting

- Employees are required to comply with this policy at all times and act with integrity in all commercial dealings
- Any concerns regarding anti-competitive behaviour must be reported via management or the company's reporting procedures
- Breaches of this policy may result in disciplinary action and/or referral to relevant authorities

Action by the organisation

Green Frog Utilities Ltd will thoroughly investigate any instances of alleged or suspected bribery.

Employees suspected of bribery may be suspended from their duties while an investigation is underway. Green Frog Utilities Ltd will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. Green Frog Utilities Ltd may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, the organisation, who are found to have breached this policy.

Green Frog Utilities Ltd may also report any matter to the relevant authorities, including the Director of Public Prosecutions, the Serious Fraud Office, the Revenue and Customs Prosecutions Office, and the police. Green Frog Utilities Ltd will provide all necessary assistance to the relevant authorities in any subsequent prosecution.



James Bourne

Director

26th March 2026