

Anti-Bribery and Corruption Policy

GreenSpark Consulting is committed to conducting business honestly, fairly and transparently. Bribery and corruption are prohibited in every form, whether direct or indirect, in the public or private sector.

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Policy owner: GreenSpark Consulting — Management **Next review:** 1 July 2027

Policy statement

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1. Purpose and scope

This policy establishes minimum standards to prevent bribery, corruption, kickbacks and improper influence. It applies to directors, employees, workers, contractors, consultants, agents, intermediaries and anyone acting for or on behalf of GreenSpark Consulting ("GreenSpark").

It applies to business activities in the United Kingdom and overseas, taking account of the laws applicable to each activity and jurisdiction.

2. Prohibited conduct

- No person acting for GreenSpark may offer, promise, give, request, agree to receive or accept a financial or other advantage intended to induce improper performance or improperly influence a decision.

Facilitation payments, kickbacks, secret commissions and unofficial payments are prohibited. A payment made under an immediate threat to personal safety must be reported as soon as it is safe to do so.

- No donation, sponsorship, charitable contribution, discount, employment offer or other benefit may be used as a disguised inducement.

Books, invoices, expenses and other records must accurately describe the nature and purpose of each transaction. False, misleading, incomplete or off-book records are prohibited.

3. Public officials and procurement

Particular care is required when dealing with public officials, elected representatives, public bodies, state-owned enterprises, procurement teams and persons responsible for permits, licences, planning or regulatory decisions.

Gifts, hospitality, travel or other benefits must never be offered to influence a tender, contract award, regulatory decision or official act. Any proposed benefit involving a public official requires prior written approval and legal review where appropriate.

During a live tender or other sensitive decision, gifts and hospitality should not be offered or accepted unless a documented exception is approved and is lawful and appropriate.

4. Third parties and commissions

Agents, introducers, consultants, subcontractors and other intermediaries must be selected for a legitimate business reason and subject to proportionate risk-based due diligence.

Written agreements must define the services, fees and deliverables. Success fees, commissions, unusual payment routes and requests to pay unrelated parties require enhanced scrutiny and documented approval.

GreenSpark will not knowingly use a third party to do something that GreenSpark is prohibited from doing itself.

5. Responsibilities and reporting

Directors are responsible for setting the tone, approving proportionate controls and ensuring concerns are addressed.

Managers must assess bribery risks in their work, ensure appropriate due diligence and approvals, and maintain accurate records.

Everyone covered by this policy must complete required training, follow approval procedures and promptly report suspected bribery, improper requests or suspicious transactions through the designated management or speak-up channel. If the usual contact is implicated, raise the concern with an independent director or external adviser.

6. Response to concerns

GreenSpark will assess concerns promptly and impartially, preserve relevant records and take proportionate corrective action. This may include suspending a transaction, further investigation, disciplinary or contractual action, and reporting to an appropriate authority where required or advised.

Retaliation against anyone who raises a concern in good faith or assists an investigation is prohibited.

7. Records, monitoring and review

GreenSpark will retain relevant risk assessments, due-diligence checks, contracts, approvals, invoices, training records and investigation outcomes under its record-retention arrangements.

This policy will be reviewed at least annually and after a material incident, change in law, business model or risk profile.

Related guidance

This policy supports compliance with applicable anti-bribery laws, including the UK Bribery Act 2010 where applicable. A written policy alone does not demonstrate that adequate procedures are operating.

Approval and document control

This is the published version 1.0 of this policy, with approval and publication dates recorded as 1 July 2026. It forms part of the GreenSpark Consulting — Governance, Integrity & Responsible Business framework and should be read with other relevant policies and applicable law.

Approved status: Approved **Effective date:** 1 July 2026 **Review date:** 1 July 2027