



# ANTI-BRIBERY & CORRUPTION POLICY

## Statement of Policy

Global Energy Solutions Ltd incorporating Global Project Services Ltd is committed to conducting its business honestly, ethically, and in full compliance with all applicable laws, including the Bribery Act 2010 and the Competition Act 1998.

We operate a zero-tolerance approach to bribery, corruption, and anti-competitive behaviour. Bribery for personal or commercial gain is a criminal offence, and we prohibit any form of bribery or corruption by personnel or by third parties acting for or on behalf of the company.

Integrity and transparency are fundamental to the way we operate, and we are committed to maintaining the highest ethical standards in all our business dealings and relationships.

We are committed to:

- Acting lawfully, ethically, and transparently in all business activities
- Preventing bribery, corruption, cartel activity, and anti-competitive practices
- Ensuring no personnel or associated person seeks or accepts improper advantage
- Monitoring compliance across all levels of the organisation
- Raising awareness and providing guidance across our workforce through communication and appropriate training.

Breaches of this policy will lead to disciplinary proceedings and, where appropriate, disciplinary action or termination of business relationships.

## Scope

This policy applies to all associated persons including personnel, volunteers, contractors, consultants, agents, suppliers, and anyone else acting on behalf of GES / GPS, and to all business activities and relationships, including dealings with clients, suppliers, competitors, regulators, and public officials.

## Responsibilities

- Directors and senior leadership are responsible for:
  - Demonstrating commitment to this policy
  - Ensuring personnel are aware of their responsibilities
  - Overseeing and monitoring compliance with anti-bribery and competition laws
  - Investigating suspected breaches promptly and fairly
- All personnel are responsible for:
  - Acting in accordance with this policy
  - Avoiding conduct that could give rise to bribery or corruption risks
  - Reporting suspected breaches promptly
  - Cooperating with investigations where required

## Prohibited Conduct

It is strictly prohibited, directly or indirectly, for any personnel or person working on behalf of the company to:

- Offer, give, request, or accept a bribe, including any gift, payment, loan, reward, or advantage (cash or otherwise)
- Engage in cartel activities or anti-competitive agreements
- Abuse a position of market power or dominance
- Seek commercial, contractual, regulatory, or personal advantage through unethical or unlawful means

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## Gifts and Hospitality

We recognise that proportionate gifts and hospitality may occur as part of legitimate business relationships. Such practices do not constitute bribery where they are reasonable, transparent, proportionate, and properly recorded, and where no improper advantage is sought or implied.

Gifts or hospitality with a value of £50 or less may be given or accepted without prior approval, provided that they are:

- Infrequent and reasonable
- Not cash or cash equivalents
- Not intended to influence, or perceived as influencing, a business decision
- Properly recorded in accordance with company procedures

## Approval Requirements

- Any gift or hospitality exceeding £50 in value must not be given or accepted without prior written approval from a director
- Gifts or hospitality offered to or received from public officials must always receive prior written approval, regardless of value

## Reporting

Anyone who suspects bribery, corruption, or anti-competitive behaviour must report the matter promptly to a company director. Reports may require a written account of events.

All concerns will be taken seriously and investigated fairly and confidentially where possible. No individual will suffer detriment for raising a concern in good faith.

Personnel are also reminded of the company's Whistleblowing Policy, available in the Company Handbook.

## Record Keeping

A director will maintain accurate records of gifts and hospitality to demonstrate compliance with legal and regulatory requirements.

## Monitoring and Review

We will monitor the effectiveness of this policy and associated procedures to ensure ongoing compliance with the Bribery Act 2010 and Competition Act 1998.

This policy will be reviewed regularly and updated as required to reflect changes in legislation or organisational needs.

Signed on behalf of Global Energy Solutions Ltd by

Ross Thomson  
Managing Director

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