Anti-Bribery Policy

This policy statement provides a framework within which staff must operate to avoid committing an offence under the Bribery Act 2010 (the "Act").

Overview

The Act creates the following offences relevant to Global Power Services Ltd:

· Paying bribes – it is an offence to offer, promise or give a bribe (so-called "active bribery").

· Receiving bribes – it is an offence to request, agree to receive or accept a bribe (so-called "passive bribery").

A person who is convicted of an offence of paying a bribe or receiving a bribe is liable, on conviction, to a maximum penalty of 10 years imprisonment and a fine or both.

A corporate offence is where a commercial organisation or associated person fails to prevent persons performing services on its behalf from committing bribery. Global Power Services Ltd (GPS) would be guilty of this offence if the person who performs a service on behalf of the organisation bribes another person intending:

(a) to obtain or retain business for GPS.

(b) to obtain or retain an advantage in the conduct of business for GPS.

If an organisation is found guilty of corporate bribery, both the organisation and its managers and/or directors could be subject to criminal sanctions. An "associated person" acting on behalf of the company could potentially include GPS directors, staff, agents and sub-contractors.

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act dishonestly. Bribes can take on different shapes and forms and often, both parties will benefit. A bribe can involve:

· a direct or indirect promise or offer of something of value.

· the offer or receipt of a loan, fee or reward.

· the offer or receipt of other advantage and/or giving of aid, donations or voting with the intention of exerting improper influence.

Policy

It is GPS's policy to conduct its business in an open, honest and transparent way and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. GPS is committed to adherence to the highest legal and ethical standards and this must be reflected in every aspect of the way in which we operate.

Hospitality and Gifts

Gifts, entertainment and hospitality also include the receipt or offer of gifts, meals, invitations to events and functions in connection with matters relating to GPS's business. These activities are acceptable provided they fall within reasonable bounds of occurrence and value. Routine inexpensive and very occasional gifts, entertainment and hospitality are acceptable whereas lavish or extraordinary gifts, entertainment and hospitality are not.

Gifts, entertainment and hospitality that are never acceptable include where something is offered for something in return. Gifts of cash or cash convertible items are expressly prohibited.

The company does not preclude the acceptance of hospitality, gifts or entertainment so long as they are reasonable. Limits apply depending on the value (estimated or known) of the gift.

· Less than £25 – no action necessary other than informing your line manager.

· More than £25 and less than £250 – this must be declared in writing to the Managing Director.

· More than £250 – the gift must not be accepted and the Managing Director informed.

In exceptional circumstances, the Managing Director may take a view on the suitability of the gift and at his sole discretion, agree that the gift can be accepted.

Acceptance of a gift within these limits which has not been declared as required is considered to be an act of gross misconduct and renders that member of staff liable to disciplinary action if found guilty.

Anti-Bribery Policy

Awarding a Contract for Goods or Services (Procurement)

Staff dealing with or using other parties must be aware of the possibility of being influenced to engage in or facilitate bribery. Staff could, for instance, receive excessive hospitality or gifts in order that they, on the company's behalf, give business to the other party. Staff must not accept any gift, hospitality or entertainment which is, or could be, construed as being designed to influence you in the performance of your job and/or to influence you to act dishonestly.

Modest entertainment or invitations to events as part of pre-contract negotiations are likely to be acceptable but in every event the Managing Director must be informed.

Donations

We do not make contributions to political organisations. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Managing Director.

Media

Any member of staff who is contacted by the media or is the subject of any complaint in respect of bribery allegations should report that immediately to the Managing Director so that a response can be prepared.

Integrity of Staff

GPS recognises that a good standard of staff recruitment and vetting is important in order to reduce the risk of employing staff who are easily persuaded and/or willing to engage in corrupt practices, including bribery and fraud.

Training

All staff will receive training which will enable them to be effective in the discharge of their responsibilities. Staff will receive regular training/briefings on the Act.

How to raise a Concern

All staff have a responsibility to help detect, prevent and report instances not only of bribery but also of any other suspicious activity or wrongdoing. GPS is committed to ensuring that all staff have a safe, reliable and confidential way of reporting any suspicious activity. If any staff member has a concern regarding a suspected instance of bribery or corruption they must notify the Managing Director.

Suppliers

As part of the company's due diligence processes into Bribery the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for Bribery issues. The level of management control required for these sources will be continually monitored. Our policy will be brought to suppliers attention as part of the GPS T&Cs.



Gerry Donnelly (Managing Director)

30/10/2026