



Bribery Policy

Energys Group (comprising of Energy Conservation Solutions Ltd & Energys Group Ltd) is dedicated to ensuring full compliance with all anti-bribery and corruption laws and regulations by all of its subsidiaries and employees. Generally, anti-bribery and corruption laws prohibit making payments or gifts to government officials to obtain or retain business, or to secure any improper business advantage. Energys Group understands the importance of eliminating bribery and corruption and the role that discouraging bribery and corruption plays in creating a safer, more stable business environment.

It is Energys Group's policy that no company officer, employee or agent may offer or accept payments (or anything else of value) to anyone to make that person act in a manner that will assist Energys Group in obtaining or retaining business or securing any improper business advantage. Every Energys Group officer, employee and agent is obligated to keep records and accounts that accurately and fairly reflect all Energys Group transactions and the use of Energys Group assets. Energys Group takes bribery and corruption very seriously, and any employee found to be violating this policy will be subject to disciplinary action, which may include termination.

Energys Group encourages its employees to report any suspicious activity that may violate this policy. There is a confidential and discrete way to report any violations or suspicious activity that is described below. An employee's failure to report known or suspected violations may lead to disciplinary action.

General Guidelines

- No payment or gift of any kind may be made, promised or offered by an officer, employee or agent of Energys Group.
- Paying excessive travel and entertainment expenses on behalf of a third party to obtain or maintain business can be considered bribes. This is therefore expressly prohibited.
- No officer, employee or agent may accept payments or gifts from customers, suppliers or other third parties involved with the business of Energys Group. Where unsolicited small gifts (for instance a bottle of wine at Christmas) are received these should be passed to the Finance Manager and will either be raffled or returned as appropriate.

Reporting a Violation

Any transaction, regardless of the value, should be reported confidentially and in person to the Managing Director.

Any employee who, in good faith, lawfully and truthfully, seeks advice, raises a concern or reports misconduct is doing the right thing. No matter how you choose to report, as long as your report is made honestly and in good faith, Energys Group will take no retaliatory action against you for making the report. Allegations of retaliation will be investigated and appropriate action taken.

Signed:

Date: 30th November 2020

Kevin Cox
Managing Director
On behalf of Energys Group

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A company in the **Energys Group**