

## Anti-Bribery Policy

### 1. INTRODUCTION

Greenwood Group Ltd under the trading name of Greenwood Plants ('Greenwood'), is a company registered in England and Wales at Companies House.

Greenwood is committed to the prevention of Bribery and Corruption, and fully supports the Bribery Act 2010 ('the Act.'). Greenwood remains bound by the laws of the UK, including the Bribery Act 2010, in respect of its conduct both at home and abroad.

'Bribery' can be defined as the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Greenwood conducts all of its business in an honest and ethical manner, with a zero-tolerance approach to bribery and corruption. Greenwood is committed to acting professionally, fairly, and with integrity in all of its business dealings and relationships wherever it operates.

### 2. POLICY

Greenwood is committed to ensuring compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

Greenwood will continue to encourage and strive towards a culture where all employees are aware of their responsibilities in identifying any situations where the potential for Bribery may arise and bringing it to the attention of the Leadership team.

The Company's Anti-Bribery Policy applies to everyone in the organisation, is reviewed annually, and is available on the Company website.

#### 2.1 GIFTS, HOSPITALITY & REWARDS

Greenwood offers its clients gifts from time to time as part of its client journey i.e. in recognising existing business, building new relationships, and in the context of seasonal gifting.

Greenwood operates a client loyalty programme 'G Club', which offers a transparent system of rewards and benefits based on their quarterly spend.

The value of any gifts, rewards or hospitality offered must be considered proportional to the value of business conducted, and approved by the Leadership team.

Employees should not offer any gifts outside of these parameters, or without the prior approval of the Leadership team.

Employees are required to declare any gifts they receive to the Leadership team, who will confirm the appropriate course of action with the gift.

## **2.2 CHARITABLE CONTRIBUTIONS**

Greenwood operates an initiative called 'Greenwood Community', whereby charitable or community-based organisations are gifted plants to improve the environments of schools, nursing homes, youth trusts etc. Greenwood actively channels its gifting through this programme. Greenwood encourages its clients, partners, employees and suppliers to participate in the Greenwood Community programme to maximise the impact of its charitable activities.

Greenwood may accept charitable donations and support from time to time, which it will channel through its Greenwood Community programme.

## **3. COMPLIANCE**

Greenwood's employees, sub-contractors, agents, and partners, must not engage in any form of bribery, either directly or through any third party; and are required to carry out all services honestly and ethically whilst promoting good working practices at all levels in accordance with the Act, without reservation.

Employees must inform the leadership team immediately if offered any type of bribe, or suspect that this may happen in the future.

Greenwood has systems in place to:

- Identify and mitigate the potential risk areas within the supply chain;
- Educate and inform its supply chain of our expectations in behaving ethically and upholding professional standards;
- Regularly monitor all its supply chain partners, agents, and sub-contractors;
- Monitor potential risks and constantly look at new ways to improve;
- Protect whistleblowers.

This Anti-Bribery Policy document is approved and endorsed by the Leadership team of Greenwood.

#### **4. CONTACT**

Any questions, queries, or comments relating to Greenwood's Anti-Bribery Policy should be addressed to [hello@greenwoodplants.co.uk](mailto:hello@greenwoodplants.co.uk)