



Anti-Bribery Policy

Purpose

Viridian Solar Ltd (the Company) is committed to instilling a strong anti-corruption culture and to compliance with all anti-bribery and anti-corruption legislation including, the Bribery Act 2010 ("the Act") and ensuring that no bribes or other corrupt payments, inducements or similar are made, offered, sought or obtained by us or anyone working on our behalf.

Bribery

Bribery is defined as the giving or promising of a financial or other advantage to another party where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage is in itself improper conduct.

Consequences of Bribery

Anyone or any organisation found guilty of bribery under the Act may face fines and/or prison terms. In addition, high legal costs and adverse publicity are likely to result from any breach of the Act.

For employees of the Company, failure to comply with this Policy and/or with the Act may result in:

- disciplinary action which may include dismissal; and
- criminal penalties under the Act which may result in a fine and/or imprisonment for up to 10 years.

For the Company, any breach of this Policy by any employee or business associate may result in:

- the Company being deemed to be in breach of the Act;
- the Company being subject to fines; and
- the Company suffering negative publicity and further associated damage as a result of such breach.

Responsibility for Compliance and Scope of Policy

This Policy applies to all employees, agents, contractors, subcontractors, consultants, business partners and any other parties associated with the Company or any of its subsidiaries.

It is the responsibility of all the abovementioned parties to ensure that bribery is prevented, detected and reported.

No aforementioned party may:

- give or promise any financial or other advantage to another party (or use a third party to do the same) on the Company's behalf where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage will in itself constitute improper conduct;
- request or agree to receive any financial or other advantage from another party where that advantage is intended to induce the improper performance of a particular function, where the acceptance of that advantage will in itself constitute improper

conduct, or where the recipient intends to act improperly in anticipation of such an advantage.

The aforementioned parties must:

- be aware and alert at all times of all bribery risks as described in this Policy;
- exercise due diligence at all times when dealing with third parties on behalf of the Company; and
- report any and all concerns relating to bribery to their line manager or, in the case of non-employees, their normal point of contact within the Company.

Gifts and Hospitality

Gifts and hospitality remain a legitimate part of conducting business but can, when excessive, constitute a bribe and/or a conflict of interest. Care and due diligence should be exercised at all times when giving or receiving any form of gift or hospitality on behalf of the Company.

The following general principles apply:

- Gifts and hospitality may neither be given nor received as rewards, inducements or encouragement for preferential treatment or inappropriate or dishonest conduct.
- Neither gifts nor hospitality should be actively sought or encouraged from any party, nor should the impression be given that the award of any business, custom, contract or similar will be in any way conditional on gifts or hospitality.
- Cash should be neither given nor received as a gift under any circumstances.
- Gifts and hospitality to or from relevant parties should be generally avoided at the time of contracts being tendered or awarded.
- The value of all gifts and hospitality, whether given or received, should be proportionate to the matter to which they relate and should not be unusually high or generous when compared to prevailing practices in our industry or sector.
- Gifts received are shared among staff by way of a raffle.

Charitable Donations

Charitable donations are permitted only to registered (non-profit) charities. No charitable donations may be given to any organisation which is not a registered charity.

Under no circumstances may charitable donations be made in cash.

No charitable donation may be made at the request of any party where that donation may result in improper conduct.

Political Donations

The Company does not make political donations and the Company is not affiliated with any political party, independent candidate, or with any other organisation whose activities are primarily political.

Employees and other associated parties are free to make personal donations provided such payments are not purported to be made on behalf of the Company and are not made to obtain any form of advantage in any business transaction.

Stuart Elmes, CEO
January 1st 2022



Version	Comments	Approved by	Date approved
01	first issue of document	SAE	01/19
02	Reviewed with minor edits	SAE	01/22