



FRANKLYN YATES ENGINEERING LTD ANTI-BRIBERY STATEMENT

6TH JANUARY 2021

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REF FYS-004

Anti-Bribery and Corruption

Franklyn Yates Engineering Ltd, part of the Greenbank Group UK Ltd (The Organisation) is to ensure that the highest standards of ethical conduct and integrity are in all its business activities.

Every employee and individual acting on The Organisation's behalf is responsible for maintaining The Organisation's reputation and for conducting company business honestly and professionally.

The Organisation considers that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets.

The Organisation benefits from carrying out business in a transparent and ethical way helping to ensure that there is honest, open and fair competition in the Expert Witness, Architecture, Engineering and Surveying professions. Where there is a level playing field, The Organisation can lead the market through reputation, experience and by delivering excellent services to its clients.

Transparent, fair conduct helps to foster deeper relationships of trust between The Organisation and its business partners and clients. It is vital for The Organisation's reputation and future growth.

The Organisation does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons or companies acting for it or on its behalf. The board and senior management are committed to implementing and enforcing effective systems throughout The Organisation to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

The Organisation has issued this Anti-bribery and Corruption Statement and Policy outlining The Organisation's position on preventing and prohibiting bribery. The Statement is published on the Greenbank Group UK Ltd website.

The Anti-Bribery and Corruption policy applies to all employees, as well as agency workers, consultants and contractors. All employees and other individuals acting for The Organisation are required to familiarise themselves and comply with The Organisation's Anti-bribery and Corruption policy with immediate effect.

A bribe is a financial inducement or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on behalf of The Organisation are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

As part of its measures, The Organisation is committed to transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure. Such expenditure must be authorised in advance, in accordance with the procedures set out in The Organisation's Anti-Bribery and Corruption policy.



A breach of The Organisation's Anti-Bribery and Corruption policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct, and immediate dismissal. Employees and other individuals acting for The Organisation should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual together with an unlimited fine for The Organisation.

The Organisation will not conduct business with service providers, agents or representatives that do not support The Organisation's Anti-Bribery and Corruption objectives. The Organisation reserves the right to terminate its contractual arrangements with any third parties acting for, or on behalf of, The Organisation with immediate effect where there is evidence that they have committed acts or been involved in bribery.

The success of The Organisation's Anti-Bribery and Corruption measures depends on all employees, and those acting for The Organisation, playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, The Organisation are encouraged to report any suspected bribery in accordance with the procedures set out in the Anti-Bribery and Corruption policy. The Organisation will support any individuals who make such a report, provided that it is made in good faith.

For and on behalf of Franklyn Yates Engineering Ltd

Company Reg No. 3864528

Charles Conroy
CEO/Managing Director

Date: 6th January 2021