

Anti-Bribery & Corruption Policy Statement

Trojan Lighting Solutions Limited (Trojan) values its reputation for ethical behaviour and integrity. Conducting business with a zero-tolerance approach to all forms of corruption is central to these values, the company’s image and reputation.

This policy statement sets out the standards expected of all employees in relation to anti-bribery and corruption. All employees must adhere strictly to relevant laws in this area, in particular The Bribery Act 2010.

The policy is also relevant for other interested parties who perform services for or on behalf of the company. Trojan expects those persons to adhere to the policy or have in place equivalent policies and procedures to combat bribery and corruption.

Trojan will ensure any concerns are investigated appropriately and any employee making a report in good faith shall suffer no detriment for doing so. The company will take firm action against any individuals or other parties that it discovers are involved in bribery.

Any breach of the policy by employees will result in disciplinary action under the company’s procedures.

Failure by any employee to report corrupt activity by other persons can also result in disciplinary sanctions, especially where there is evidence that an employee has attempted to cover up or disguise another's wrongdoing.

Trojan has a zero-tolerance policy towards corruption of all kinds. Employees should note that it is a criminal offence to offer, promise, pay, request or accept a bribe. A bribe does not need to be a monetary sum. It can be any form of advantage, offered or received.

A contract does not need to have been won for a corruption offence to have been committed. Trojan has four main rules that all employees must adhere strictly to:

- Do not offer, promise or pay bribes.
- Do not request, agree to or accept bribes.
- Do not make payments to someone (or favour then in any other way) if you know that this will involve someone in misuse of their position (or them performing their functions improperly).
- Do not misuse your position (or perform your functions improperly) in connection with payments (or other favours) for yourself or others.

Reasonable and Proportionate Gifts and Hospitality

This policy is not meant to prohibit the giving or receiving of reasonable and proportionate gifts and hospitality as long as they are appropriate in all the circumstances and there is no risk of perception that they might improperly influence the recipient.

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In the case of hospitality provided or received intended to foster cordial relations, it must have legitimate marketing purposes and the level of hospitality is appropriate with regard to the recipient and their organisation and must never be cash.

All sponsorship and donations made on behalf of the company must be approved in advance by the company owner.

Facilitation (small unofficial) payments to speed up administrative processes, are bribes and prohibited by this Policy. Where an employee suspects a demand for a payment is a request for a facilitation payment, this must be reported immediately to the Managing Director.

Whistleblowing

Whistleblowing refers to a worker who reports certain types of wrongdoing. This will usually be something seen at work - though not always. The wrongdoing you disclose must be in the public interest. This means it must affect others, for example the general public.

As a whistleblower you're protected by law - you should not be treated unfairly or lose your job because you report potential wrongdoing. You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future.

You're protected by law if you report any of the following:

- A criminal offence, for example fraud.
- A miscarriage of justice.
- The company is breaking the law, for example does not have the right insurance.
- You believe someone is covering up wrongdoing.

This policy statement will be briefed to all employees at induction and shall be formally reviewed on an annual basis by directors.

This Policy Statement is authorised by:

Signed:

Position: Managing Director

Date: 10th May 2024

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