

## **Policy - Rail**

**Title: Anti - Bribery and Corruption Policy**

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This document sets out the rules of the Company in relation to anti-bribery and corruption matters in the United Kingdom.

Compliance with the Company's policy in relation to bribery and corruption is regarded as part of your contract of employment. If you fail for any reason to follow the rules set out in this document this may result in disciplinary action being taken against you which could result in your dismissal.

**Bribery** is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of the Company's business.

**Corruption** is the misuse of entrusted power for private gain.

To place this in context, you should be aware that if you engage in activities which are contrary to UK anti-bribery and corruption legislation, you could face up to 10 years in prison and/or an unlimited fine, and the Company could also be liable to an unlimited fine and Government sanction.

This policy document is not regarded as exhaustive, but does give specific examples of situations and sets out the rules and procedures which should be followed.

If you are at any time uncertain as to whether your actions will comply with this policy, you must seek guidance from the Managing Director.

You should at all times act in accordance with the following provisions:-

- behave honestly, be trustworthy and set a good example;
- use the resources of the Company in the best interests of the Company and do not misuse those resources;
- make a clear distinction between the interests of the Company and your private interests to avoid any conflict of interest, and if such conflict does arise you should report it to the Managing Director immediately;
- ensure that any community support, sponsorship and charitable donations do not constitute bribery, and if in doubt you should consult the Managing Director;
- confidentially report all incidents, risks and issues which are contrary to this policy document to the Managing Director;
- raise any issues regarding anti-bribery and corruption laws and the Company's policies. Queries will be dealt with anonymously and a written response will be issued;
- Do not offer or accept bribes.
- Do not, without express prior written approval from the Managing Director, offer or accept any gifts or hospitality to or from clients, contractors, suppliers, other third parties or public officials.

**Gifts** are presents such as flowers, vouchers, food and drink. Event and travel tickets given to you as an individual are also gifts when they are not to be used in a hosted business context.

**Hospitality** includes invitations to hosted meals, receptions and events for business purposes.

- Do not offer money to any public officials in order to speed up service or gain improper advantage. This type of bribery is a 'facilitation payment' and is illegal. If you are faced with a demand for a facilitation payment you must:
  1. Actively resist the payment;
  2. Inform the Managing Director.

The UK anti- bribery and corruption legislation applies to all activities of a UK-based business no matter where they are carried out in the world. This policy therefore applies to ALL activities worldwide, whatever the local law, practice or custom may be.

We will undertake an annual risk assessment of the possibility of bribery within the business.

Signed: Steven Horrigan  
Position: Managing Director  
Dated: 04/12/21