



Professional



Responsible



People



Teamwork



Passionate

## **ANTI - BRIBERY POLICY**

It is Global Rail Construction Limited's policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery. The policy below sets out the Company's responsibilities and those of its workers and others associated with Global Rail Construction Limited in upholding the Company's position on bribery and corruption.

In accordance with the Bribery Act the Company prohibits the following:

- the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement, regardless of size;
- to or from any person, company, or other organisation wherever they are situated and whether they are a public official or body or private person or company;
- by any individual employee, agent or other person or body acting on the Company's behalf;
- in order to gain any commercial, contractual or regulatory advantage for the Company in a way which is illegal/unethical;
- or in order to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition includes facilitation payments made to public officials for securing or accelerating routine processes and procedures, and also covers threatening behaviours or retaliation against another employee or worker who has refused to commit a bribery offence or who has raised concerns under this policy.

The Company has assessed its main risk areas for the purpose of putting adequate procedures in place and they include; purchases of goods and services; tenders and bids for contracts; the giving/receiving of gifts and hospitality; collaborations, joint ventures, partnerships, affiliations; and subsidiaries.

To maintain and understand the policy, particularly in relation to support the company's activities it is not the intention to prevent the following activities:

- Normal and appropriate hospitality.
- The giving and receiving of traditional, seasonal low value gifts.

Staff must adhere to the company policy on the acceptance of gifts and hospitality and ensure they record all gifts and hospitality in accordance with the policy.

Such hospitality or gifts must comply with the policy and procedure on the acceptance of gifts and hospitality, be in moderation and not place any expectation on the recipient to reciprocate either in like or by performing, or failing to perform, any other task in return. These should be firmly but politely declined. If there is any doubt as to whether the acceptance of such an item is appropriate, or whether an action might constitute bribery the matter should be referred to the relevant Director for a decision. In circumstances where gifts and hospitality are presented to a Director then the independence must be sought from another Director.

All members of staff have a responsibility to prevent, detect and report bribery. They also have a responsibility to read and comply with this policy and any updates to other applicable policies and procedures for the prevention of bribery including the Company Bribery Act Policy and Procedure, the Expenditure procedure and Disciplinary Policy.

Any suspicion of bribery or attempted bribery committed by or against an employee, agent or other party acting on behalf of the Company must be reported immediately to the Company Directors.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. The Company reserves its right to terminate its contractual relationship with others with which it is associated if they breach this policy.

This policy is in place to protect anyone reporting reasonable suspicion or who has concerns about possible transgression. Staff should notify their line manager or another senior person if they identify a risk which they think may not have been addressed by anti-bribery measures.

It is the responsibility of everyone in the business to comply with this policy and its associated arrangements as an integral part of their day to day business.

The policy will be reviewed annually, as a minimum by the Directors in consultation with the Head of Compliance and amended as required by law should new legislation come into force or to ensure it remains relevant and appropriate to the organisation. This has been endorsed by the Management team at Global Rail Construction Limited who take direct responsibility for its execution.

**Signed on the 8<sup>th</sup> June 2018 for and on behalf of Global Rail Construction Limited.**

Signed: \_\_\_\_\_

**M G Lombardelli**  
**Managing Director**

ABP/DOC/001

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Signed: \_\_\_\_\_

**P. Coleman**  
**Head of Compliance**