

Policy - Rail

Title: Anti - Bribery and Corruption Policy

This document sets out Matchtech's guidelines and rules in relation to anti-bribery and corruption matters in the United Kingdom.

Compliance with this Matchtech policy in relation to bribery and corruption is regarded as part of the contract of employment. If for any reason the rules set out in this document are not followed this may result in disciplinary action being taken, which could result in 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 Matchtech 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 Matchtech 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 Rail Director.

You should always act in accordance with the following provisions: -

- Behave honestly, be trustworthy and set a good example.
- Use Matchtech resources in the best interests of the company and do not misuse those resources.
- Make a clear distinction between the interests of Matchtech and your private interests to avoid any conflict of interest, and if such conflict does arise you should report it to the Rail Director immediately.
- Ensure that any community support, sponsorship and charitable donations do not constitute bribery, and if in doubt you should consult the Rail Director
- Report all incidents, risks and issues which are contrary to this policy document to the Rail Director.
- Raise any issues regarding anti-bribery and corruption laws and the Matchtech 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 Rail 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 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 Rail 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.

An annual risk assessment shall be conducted to assess of the possibility of bribery within the business.

Signed:



(Kenny Burton)

Position:

Rail Director

Dated:

3rd July 2024