

Anti-bribery & Corruption Policy

KGJ Price (Railway Contractors) Ltd., is committed to upholding its reputation and integrity, and identifies the importance of how derogatory any involvement in bribery or corruption.

In order the limit its potential exposure, KGJ Price (Railway Contractors) Ltd., will:

- Set out a clear anti-bribery policy.
- Train all employees so that they can recognise and avoid the use of bribery themselves and educate others.
- Encourage employees to be vigilant and to report any suspicion of bribery and provide them with the ways and means to communicate this information to the directors of the company, without fear of repercussion.
- Investigate any instance of alleged bribery and co-operate fully with the police.
- Not allow any political contributions to be made by the company.
- Ensure that any individuals found guilty of such breaches are dealt with accordingly.

Definition of Bribery: “The offering, promising, giving, receiving or soliciting of something of value for the purpose of influencing the action of any individual in the discharge of their duties.”

KGJ Price (Railway Contractors) Ltd., prohibits: The offering, the giving, the solicitation or the acceptance of any bribe whether cash or other inducement **to or from** any person or company, 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 personal advantage, financial or otherwise for the individual or anyone connected with the individual.

The company re-iterates that this policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them and which is intended to influence them to take action which may or may not be solely in the interests of the company or of the person or body employing them or whom they represent.

It is not the intention of this policy to prohibit the following practices providing they are customary within the industry, are proportionate and are properly recorded in writing.

- Normal and appropriate hospitality at organised client networking events
- The giving of a ceremonial gift, i.e., length of service/anniversary/achievement/award.
- The use of any recognised fast track process which is available to all on payment of a fee.
- The offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.
- Donations to charities will only be permitted by the Directors prior written consent and record.

Decisions as to what is acceptable may not always be easy. It is therefore company policy to seek clarification from the Directors prior to any action being taken. In the event that a contract or service is being utilised by the Directors in a capacity outside of KGJ Price (Railway Contractors) Ltd., then the Directors shall defer any decision making process to the Senior Management Team.

The prevention, detection and reporting of bribery is the responsibility of all employees

All reported instances of alleged bribery will be dealt with in the strictest confidence and if you prefer, and the law permits, you can report anonymously.

KGJ Price (Railway Contractors) Ltd., will not tolerate any form of bribery or corruption. Bribery is a criminal offence which may lead to criminal penalties and will be considered gross misconduct

This policy and supporting arrangements will be reviewed at least once annually

Signed:



Position:

DIRECTOR

Date:

14/4/2023

KGJP QAL POL 00006	Issue: 3	Authorised	BE
Anti-bribery & Corruption Policy	14/04/23	Approved	MH