



## ANTI- BRIBERY POLICY STATEMENT

### 1. Introduction

The Bribery Act, which came in to force in July 2011, represents the biggest change to UK law in this area of business for many generations. There are a new set of risks to navigate with the introduction of the legislation. The Act introduces a new crime of “failure to prevent” bribery, which means that companies unable to demonstrate that they have implemented “adequate procedures” to prevent corrupt practices within their organisation, or by third parties on their behalf, could be exposed to unlimited fines.

Seaton Rail Limited values its reputation for ethical behaviour and integrity. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. The purpose of this Policy Statement is to set out for Board members, employees and clients of the Company the aim of limiting Seaton Rail’s exposure to bribery by;

- Setting out a clear anti-bribery policy,
- Training all employees and Board members so that they can recognise and avoid the use of bribery by themselves and others,
- Encouraging our employees to be aware and to report any suspicion of bribery, in a manner which provides them with a safe and reasonable assurance of sensitive handling,
- Rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in a resultant prosecution,
- Investigating the most severe disciplinary action against any individual (s) involved in bribery and informing the appropriate authorities.

### 2. Scope

This Policy Statement applies to Directors, employees and clients who work for or with the Company.

The Company prohibits the offering, giving, solicitation or 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, Board Member, agent or other person or body acting on Seaton Rail Limited’s behalf in order to gain any commercial, contractual, monetary or regulatory advantage for the Company or themselves or any other in a manner which is unethical, immoral or illegal.

### 3. Further clarification

This policy statement 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 not be solely in the interests of the Company or of the person or body employing them or whom they represent.

#### **Corporate hospitality**

This policy is not meant to prohibit the practice of corporate hospitality providing this is customary, proportionate and properly recorded, nor is this policy intended to prevent the giving of a gift of an appropriate value at a time of seasonal festivities or other important date. If you are at all unsure as to whether any gift or form of hospitality is appropriate or not, speak to your Line Manager or Managing Director for clarification.

#### **Business gifts**

All offers of business gifts should be referred to the Managing Director and offers should only be accepted or made following clearance from them. Where business gifts are

Integrated Business Management System		Anti- Bribery Policy	
Document Number: POL/ 17	Issued: January 2020	Issue Number: 06	Page 1 of 2
Document Controller:	Mr Shane Seaton	UNCONTROLLED WHEN PRINTED	



accepted or provided details of the gift and the reason for the gift should be provided to the Managing Director who will retain a record.

The provision of small promotional gifts such as diaries, pens or similar marketing collateral are generally regarded as acceptable however if there is any doubt please refer to the Managing Director.

### **Whistle-blowing**

If you are concerned that a corrupt act of some kind is being considered or has been carried out, either within Seaton Rail Limited or by any of our business partners or our competitors, then you must report the issue/concern to your line manager and/or the Managing Director. Failure to report an incidence of bribery will result in disciplinary proceedings.

If you are an employee and feel unable to raise the issue with the management team, then you should contact the Managing Director, all communications with the Managing Director are entirely confidential, and no employee is at any risk of any retaliation for reporting an incidence in good faith.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to your Line Manager. If necessary, guidance should also be sought from the Managing Director

## **4. Employee and Board responsibility**

The prevention, detection and reporting of bribery is the responsibility of all employees and Directors throughout the Company. This document forms part of our standard terms and conditions of employment for all employees.

Any questions relating to the Bribery Act should be referred to the Managing Director.

## **5. Policy Review**

This policy statement will be reviewed a minimum of annually, revised as necessary and re-issued.

Reviewed By:

A handwritten signature in black ink, appearing to read "Shane Seaton".

Shane Seaton  
Managing Director  
Date: 16<sup>th</sup> January 2020

<i>Integrated Business Management System</i>		<i>Anti- Bribery Policy</i>	
Document Number: POL/ 17	Issued: January 2020	Issue Number: 06	Page 2 of 2
Document Controller:	Mr Shane Seaton	UNCONTROLLED WHEN PRINTED	