Beveridge Associates Partnership Limited

Control of Bribery and Corruption Procedure

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Beveridge Associates Ltd is committed to conducting all business activities honestly, fairly and with integrity. The Company operates a zero-tolerance approach to bribery and corruption and will comply with the requirements of the Bribery Act 2010, client requirements and railway industry expectations.

This procedure applies to all directors, employees, agency workers, consultants, subcontractors and any person acting on behalf of the Company.

a) A process for:

i. preventing bribery and corruption

The Company shall maintain arrangements to prevent bribery and corruption by:

- Prohibiting the offering, promising, giving, requesting or accepting of bribes, kickbacks, facilitation payments or other improper inducements.
- Conducting business solely on the basis of quality, capability, value and legitimate commercial considerations.
- Ensuring all financial and business transactions are accurately recorded and supported by appropriate documentation.
- Applying appropriate controls when selecting, appointing and managing suppliers, subcontractors, consultants and other business partners.
- Requiring employees to declare any actual, potential or perceived conflicts of interest.
- Providing anti-bribery guidance and awareness to employees whose duties could expose them to bribery risks.
- Monitoring business activities for signs of bribery, corruption or unethical conduct.

- Investigating reported concerns promptly and confidentially.

ii. gifts, hospitality and business courtesies

The Company shall ensure that:

- Gifts and hospitality are reasonable, proportionate and for legitimate business purposes only.
- Gifts, hospitality or benefits are not offered or accepted with the intention of influencing a business decision.
- Cash gifts or cash equivalents are prohibited.
- Any gifts, hospitality or benefits exceeding limits established by the Company are declared and recorded.
- Records of gifts and hospitality are maintained where appropriate.

iii. identifying and managing bribery risks

The Company shall:

- Periodically assess business activities to identify potential bribery and corruption risks.
- Consider risks associated with procurement activities, supplier relationships, clients, agents, consultants and business development activities.
- Implement appropriate controls to reduce identified risks.
- Review bribery risks following significant organisational, contractual or operational changes.

iv. reporting concerns

The Company shall encourage employees and other interested parties to report any concerns regarding bribery, corruption, unethical conduct or conflicts of interest.

Reports may be made to a Director, Line Manager or other designated representative and shall be investigated promptly and confidentially.

No employee shall suffer detriment for reporting a genuine concern in good faith.

v. investigation and corrective action

Where actual or suspected bribery is identified, the Company shall:

- Conduct an appropriate investigation.

- Take immediate action to prevent continuing breaches.
- Implement corrective and preventive actions where required.
- Apply disciplinary action where breaches are substantiated.
- Notify relevant authorities where legally required.

vi. review and continual improvement

The effectiveness of anti-bribery arrangements shall be reviewed through:

- Internal audits.
- Management reviews.
- Review of incidents and reported concerns.
- Changes in legislation, client requirements and industry good practice.