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DB Rail Solutions

Anti-Bribery Policy

Effective May 21st 2025

DB Rail Solutions Ltd
Unit 1 & 2 Ace Business Park,
Burley Close, Chesterfield,
United Kingdom, S40 2WL
Company Number: 16145208

DB Rail Solutions Ltd

Anti-Bribery Policy

The Bribery Act 2010 makes it a criminal offence where it is proved that a company has failed to take reasonable precautions and actions to;

- Prevent its managers, employees or any contracted organisation from accepting bribes from another party or person or
- Permits its managers, employees or any contracted organisation to attempt to bribe another party or person

DB Rail Solutions Ltd is committed to the prevention, deterrence and detection of both fraud and bribery and all other corrupt business practices.

There is zero tolerance for such behaviour which is in direct contradiction of the company's core values of honesty, openness and responsible business behaviour – any actions proven or otherwise are damaging to the company reputation.

DB Rail Solutions Ltd strive to promote a reputation of lawful and responsible business behaviour which is of crucial importance if we are to survive and grow.

It is an absolute requirement that all Directors, managers, employees and contracted organisations;

- Act with honesty and integrity at all times
- Safeguard the company resources for which they are responsible
- Comply with the spirit of this policy and UK laws and legislation and
- Respect our clients, customers, suppliers and others

It is the responsibility of all to prevent unethical and illegal business practices.

The introduction and implementation of this policy is not intended to prohibit the normal and appropriate hospitality or business gifts provided it is proportionate and properly recorded.

Where personnel believe that this policy has been breached or there is a suspected breach, they must report this to their manager. Should any personnel believe their manager is involved in a breach or a suspected breach they must report this to the Managing Director.

Should there be breaches or suspected breaches of this policy they will.

- Be investigated and where appropriate disciplinary action will be taken
- Remedial action will be taken to remedy the breach and prevent recurrence

Personnel are to be made aware of this policy and will be given information, training, guidance and instruction on the application of the requirements.

It should be noted that the penalties for conviction include a maximum prison sentence of 10 years, unlimited fines, confiscation of any proceeds, debarment from public sector contracts and director disqualification.

Management alone cannot achieve this policy; it needs the support and assistance of all, including any organisations working for or with us.

Receiving gifts and hospitality

Any personnel or any member of their family should not, directly or through others, solicit or accept money, gifts, hospitality or anything else that could influence or reasonably give the appearance of

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influencing the relationship with that organisation or individual.

Unless you have been informed you may not accept gifts or hospitality.

If a gift or hospitality is found to have been accepted, then your manager will discuss the circumstances with you and agree how to deal with it. e.g. a gift can be returned, or steps can be taken to ensure that the acceptance of hospitality does not influence a decision or situation in favour of the giver. If gifts or hospitality are accepted on more than one occasion or are found to have influenced decisions inappropriately against DB Rail Solutions Ltd (or potentially illegally), then appropriate disciplinary procedures will follow.

Compliance

All staff are required to comply with The Bribery Act 2010.

All Staff will be regularly updated on any changes in the legal framework.

Conflicts of interest policy

A conflict of interest occurs when you advance a personal interest (or that of others with whom you are connected) at the expense of the company

Reporting bribery, corruption and non-compliance with this policy

If you know of, or have good reason to suspect that, an unlawful or unethical situation or that you suspect that either an act of bribery or non-compliance to this policy has occurred; you should report the matter to your line manager. Should reporting in this way be inappropriate, you should refer to the Managing Director.

This policy will be reviewed at least every 12 months and updated as necessary.



Dave Barnett
Managing Director
8th January 2025