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|  | Pro Rail Services Ltd | POL-07 Issue 1 |
| | Anti-Bribery Policy | |

Pro Rail Services Ltd (PRS) are committed to preventing Bribery by persons associated with the business and commit to carrying out our business in a fair, honest and open way, commit to zero tolerance towards bribery and believe that by rejecting Bribery our reputation will be enhanced further and customers and suppliers will have increased levels of confidence in dealing with us.

PRs have informally assessed the risks within the organisation and have procedures in place to cover a range of principles surrounding our policy including top level involvement, due diligence on staff, communication and monitoring & review.

For clarity the company may undertake various marketing events and entertainment functions that clients are invited to attend and we do this to get to know our clients, create opportunities to obtain feedback and explain more about our services.

We also believe that good business relationships are built between companies with similar cultures. Such events allow parties to identify respective culture and assess each other's attitudes towards key business issues. In addition we sometimes meet clients for discussions over a meal as a speedier or more convenient way to achieve the above or just as a way to extend the working day in carrying out the normal business activities of customer service, planning, monitoring activity or review.

The company may give away small branded promotional items to many clients and on occasion we give small and low cost gifts at Christmas to help build name awareness. Sometimes, to help support good causes that are brought to our attention by clients, we contribute to charitable endeavours - typically sponsored achievements, but we always keep this relatively low and in proportion. We will always respect clients' own requirements for their staff not to attend functions and abide by any contractual requirements between the parties that restrict such meetings or acceptance of gifts, however small.

Where events or entertainment functions do take place we have procedures in place to keep such invitations proportional and purposeful. There is full transparency of transactions, expense claims and disclosure of information across our central staff monitoring and reviewing marketing and entertainment expenditure. Management approval and signing off checks are in place to verify compliance.

Outside of our normal business activities, described above, we wish to make it clear that it is forbidden for any employee to offer, promise or give a financial or other advantage to another person in an attempt to bring about any improper conduct by that person. In addition employees must never accept or take any financial or other advantage from persons in our supply chain where it is intended that the employee should act improperly towards that supplier as a result.

"The consequences of breaching our policy on Bribery for employees will be Immediate Disciplinary Action".

Managing Director
Signed



Date: December 2019