

1. Introduction

Greatway T&C is committed to maintaining the highest professional, ethical and legal standards across all its operations. This policy forms a core part of the company's governance, safety and compliance management system used for rail maintenance, environmental works and infrastructure support services.

Bribery and corruption represent serious criminal offences under the UK Bribery Act 2010 and cause significant harm to organisations, individuals and society. Greatway T&C has zero tolerance for bribery or corruption in any form.

This policy has been developed to meet the requirements of:

UK Bribery Act 2010 - including offences of bribing, being bribed, bribing a foreign public official, and corporate failure to prevent bribery
Anti-Bribery Management Systems Rail Industry Supplier Qualification Scheme (RISQS) requirements
Network Rail and client-specific supply chain compliance obligations
Modern Slavery Act 2015 (related third-party obligations).

2. Purpose

The purpose of this policy is to provide clear guidance, responsibilities and procedures that support safe, ethical and compliant operations. This policy:

Prohibits all forms of bribery, corruption, kickbacks and facilitation payments. Establishes clear standards expected from employees, contractors and suppliers, sets out reporting procedures and protections for those who raise concerns and demonstrates Greatway T&C's 'adequate procedures' under the UK Bribery Act 2010.

3. Scope

This policy applies to all employees (permanent, temporary, part-time and agency), directors and senior management, contractors, subcontractors and labour-only contractors, consultants, agents, representatives and joint venture partners and any individual or organisation acting on behalf of Greatway T&C.

The policy also covers all operational activities including railway track maintenance and infrastructure works, environmental works and waste management services, infrastructure support and logistics services, procurement and supply chain activities and client relationship management and business development.

This policy applies in the UK and in any other jurisdiction where Greatway T&C operates, regardless of local customs or practices.

4. What is Bribery & Corruption?

Bribery is the offering, promising, giving, accepting or soliciting of an advantage - financial or otherwise - as an inducement or reward for action that is illegal, unethical or a breach of trust.

Examples of bribery and corrupt acts include, but are not limited to:

Offering cash payments or gifts to a client to secure a contract, accepting money, gifts or hospitality from a supplier in exchange for preferential treatment, offering or receiving 'kickbacks' in procurement or sub-contracting
Making payments to speed up routine processes (facilitation payments - see Section 6),
influencing a public official through improper gifts or payments and manipulating financial records to conceal corrupt payments.

5. Responsibilities

5.1 The Director

Bears overall responsibility for implementing and maintaining this policy, ensures adequate resources are in place to prevent bribery, reviews and approves this policy annually, acts as the ultimate escalation point for reported concerns.

5.2 Managers and Supervisors

Ensure all staff under their supervision understand and comply with this policy and cascade requirements to their teams, conduct due diligence checks on subcontractors and suppliers and report any known or suspected breaches to the Director immediately.

5.3 All Employees and Contractors

Read, understand and comply with this policy, declare and seek approval for any gifts, hospitality or potential conflicts of interest, refuse any offer that may constitute a bribe or improper inducement, report concerns promptly using the whistleblowing procedure (Section 10) and never make or authorise a facilitation payment on behalf of Greatway T&C.

6. Facilitation Payments

Facilitation payments are small unofficial payments made to government officials or other individuals to speed up routine actions (e.g., processing permits, customs clearance). These payments are illegal under the UK Bribery Act 2010 regardless of their size or local custom.

Greatway T&C strictly prohibits all facilitation payments. Employees must refuse any request for such payments and report it immediately to their line manager and the Director. If an employee faces a situation where a facilitation payment is demanded they should:

- Politely decline and state company policy prohibits such payments
- Document the request in writing as soon as possible
- Report the incident to the Director within 24 hours
- Not make the payment under any circumstances, even under duress, without prior Director approval and legal advice.

7. Gifts, Hospitality & Expenses

7.1 Acceptable Gifts & Hospitality

The company recognises that gifts or hospitality may occasionally form part of normal business relationships. However, employees must always consider whether any gift or hospitality offered or received is reasonable, appropriate and free from any intention to influence a business decision.

Reasonable hospitality may be given to or accepted from third parties where it supports legitimate business purposes, such as maintaining professional relationships or promoting the company's services.

Gifts or hospitality with a value not exceeding £100 may be accepted or offered if they:

- Are not intended to obtain a business advantage or influence a decision
- Are not cash or cash equivalents (such as vouchers)
- Are reasonable and proportionate in value and timing
- Are given open and transparently
- Comply with applicable laws and company procedures.

Reasonable reimbursement of business expenses related to legitimate meetings or events may also be acceptable. However, excessive or inappropriate payments will not be permitted.

Employees must ensure that all gifts, hospitality and expenses are handled responsibly and do not create conflicts of interest or reputational risk for the company.

All gifts and hospitality offered, received or declined with a value over £100 must be recorded in the Gifts & Hospitality Register held by the Director's office. Entries must include: date, nature of gift/hospitality, estimated value, name of giver/recipient and business relationship.

7.2 Supplier & Subcontractor Vetting

All new subcontractors must complete a Pre-Qualification Questionnaire (PQQ) which includes anti-bribery declarations. High-risk suppliers (foreign-based, high-value contracts, regulated sectors) must complete enhanced due diligence. Contracts must include an anti-bribery clause obligating third parties to comply with the UK Bribery Act 2010. Supplier performance and compliance will be reviewed at contract renewal.

8. Whistleblowing & Reporting

Greatway T&C encourages all employees, contractors and third parties to raise concerns about suspected bribery or corrupt conduct without fear of retaliation.

8.1 How to Report

Speak directly to your line manager, then report directly to the Director: Rickson Chivunga info@greatwaytc.co.uk. Submit a written concern marked 'Strictly Confidential' addressed to the Director, where a concern involves the Director, reports may be made to the company's solicitor/legal advisor.

8.2 Protection for Reporters

Greatway T&C prohibits any retaliation, victimisation or disadvantage against any person who reports a concern in good faith confidentiality will be maintained as far as practicable during any investigation. Malicious or false allegations may result in disciplinary action. Workers raising concerns are also protected under the Public Interest Disclosure Act 1998.

9. Training & Awareness

All personnel covered by this policy must receive appropriate anti-bribery training to ensure they understand:

- What constitutes bribery and corrupt conduct
- Their obligations under the UK Bribery Act 2010
- How to recognise and respond to bribery risk situations
- How to report concerns.

10. Compliance & Consequences

10.1 Legal Consequences

Conviction under the UK Bribery Act 2010 may result in:

- Unlimited fines for the company
- Up to 10 years imprisonment for individuals
- Debarment from public sector and rail industry contracts
- Reputational damage and loss of RISQS/client accreditation.

10.2 Disciplinary Consequences

Breaches of this policy by employees or contractors will result in disciplinary action, which may include:

Formal warning or final written warning, dismissal or termination of contract (which may be summary dismissal in serious cases), referral to relevant regulatory or law enforcement authorities

And civil recovery proceedings.

Greatway T&C may also terminate any third-party contract where a breach of anti-bribery obligations is identified.

11. Political Donations, Charitable Contributions and Conflicts of Interest

Greatway T&C does not make political donations. Charitable contributions must not be used to disguise bribery or improperly influence business decisions and must be approved by the Director. Employees and contractors must declare any conflicts of interest. Where agents, consultants or intermediaries deal with government officials or public bodies on behalf of the company, appropriate due diligence must be undertaken to ensure compliance with this policy and the UK Bribery Act 2010.

11. Monitoring & Review

This policy will be reviewed annually by the Director. Reviews will also be triggered by: changes in legislation, operational changes, client audit findings, or any reported incidents. The Director is responsible for monitoring compliance including reviewing the Gifts & Hospitality Register, training records and due diligence files. Key performance indicators (e.g., training completion rates, number of reported concerns, supplier audit results) will be recorded and reviewed annually. This policy will be communicated to all staff at induction and whenever it is updated.

Authorisation

I confirm this policy has been reviewed, approved and is effective from 2026.

Rickson Chivunga

Director, Greatway T&C

