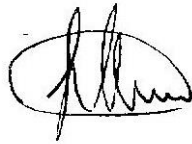


Time2Train Ltd

Anti Bribery Policy

Signed:



Director: John Young

Date: 26/04/2023

Next review Date: 26/04/2024

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PURPOSE

Time2Train values its reputation for ethical behaviour, for financial integrity and reliability and has a zero tolerance policy towards bribery.

Our business prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement, to or from any person or company, public or private. By staff, contractors, consultants, agents, external examiners and any non-employee service providers engaged on company business for whatever reason, in order to gain any commercial, contractual or regulatory advantage for Time2Train, in a way which is unethical or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

Time2Train has a zero tolerance policy towards any behaviour that constitutes bribery, under the definition given above, and has put in place procedures for reporting and investigating acts of suspected bribery.

Time2Train has taken steps to limit the risk of bribery through:

- (a) Setting out a clear anti-bribery policy.
- (b) Training employees so that they can recognise and avoid the use of bribery by themselves and others.
- (c) Encouraging employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately.
- (d) Rigorously investigating alleged bribery, where necessary assisting appropriate authorities.
- (e) Taking firm and vigorous action against any individual(s) involved in bribery.
- (f) Monitoring of the effectiveness of such controls.

The responsibility to control the risks of unethical business practices occurring resides at all levels of the organisation. The prevention, detection and reporting of bribery is therefore the responsibility of all staff.

SCOPE

Time2Train recognises that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another. This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body Time2Train 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.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- (a) appropriate and reasonable hospitality
- (b) the giving of a ceremonial gift on a festival or at another special time
- (c) the use of any recognised fast-track process which is available to all on payment of a fee
- (d) the offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

Time2Train prohibits payments including "facilitating" or "expediting" payments to others in order to secure prompt or proper performance of routine duties.

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 the senior manager with responsibility for this policy before proceeding.

OTHER RELEVANT POLICIES:

Whistleblowing policy

USEFUL LINKS:

The [Bribery Act 2010](#)

REVIEW

This policy will be reviewed annually as part of our quality assurance procedures. Reviews will also take place when there are changes, legislative updates and updates defined by the ESFA and IfATE.