



...because it's never just black and white®

Company Policy Statement: **Anti-Bribery Policy**

Portfolio: Business Services

Portfolio Director: Mr Frank Lloyd-Murray

Document Reference: GRAAYPOL\DOC\2022\Anti-Bribery\Rev.12.0209][3

Published Year: 2022 (June)

Status: Published

graay.a4.policy.anti-briberypolicy.docx

Author: Mr Frank Lloyd-Murray



File Reference: [https://graaylimited.sharepoint.com/sites/graaylimitedsynology/shared documents/legal/graay/documents/iso9001/02.03cs - policy control/graay.a4.policy.anti-briberypolicy.docx](https://graaylimited.sharepoint.com/sites/graaylimitedsynology/shared%20documents/legal/graay/documents/iso9001/02.03cs%20-%20policy%20control/graay.a4.policy.anti-briberypolicy.docx)
Released: 08/12/2022 13:43:00

...committed to life-long learning and excellence in all we do.

(C) Copyright GRAAY® Limited 2011-2022. All rights Reserved.
Document Designation: Commercial in Confidence (Internal Team Only)

DOCUMENT ETYMOLOGY

Title

Policy Statement for	Portfolio
Anti-Bribery Policy	Business Services

Responsibility

Reference	
Organisation	GRAAY@ Limited
Portfolio Director	Mr Frank Lloyd-Murray
ISO Document Reference	GRAAY\POL\DOC\2022\Anti-Bribery\Rev.12.0209
Electronic Library Location	https://graaylimited.sharepoint.com/sites/graaylimitedsynology/shared documents/legal/graay/documents/iso9001/02.03cs - policy control/graay.a4.policy.anti-briberypolicy.docx

Version and Status

Version	Date	Author	Status
3	22/11/2021 14:52	Mr Frank Lloyd-Murray	Published

Approver

Title	Name	Date
Chief Executive Officer	Mr Frank Lloyd-Murray	Thursday, 08 December 2022

Distribution

Name	Business Area	Reason and Use
Director (Project Management)	Senior Leadership	Sign-Off and Acceptance
Director (Rail Systems Engineering)	Senior Leadership	Sign-Off and Acceptance
Director (Business Development)	Senior Leadership	Sign-Off and Acceptance
Director (Software and Systems Design)	Senior Leadership	Sign-Off and Acceptance
Director (Training and Development)	Senior Leadership	Sign-Off and Acceptance
Director (Telecommunications)	Senior Leadership	Sign-Off and Acceptance



Company Statement: Anti-Bribery Policy

Portfolio: Business Services

Published: 2022 (June)



DOCUMENT ETYMOLOGY 2

Title..... 2

Responsibility..... 2

Version and Status..... 2

Approver..... 2

Distribution..... 2

What exactly is a Policy Statement? 1

ANTI-BRIBERY POLICY STATEMENT 2



Section: 2 – The Policy Statement

What exactly is a Policy Statement?

A policy statement is an organization-level document that prescribes acceptable methods or behaviours. Essentially, a policy is simply the way things are done within an organization.

Policies are different from procedures and standard operating procedures because they are applicable to an entire organization and are primarily intended to set direction.



...committed to life-long learning and excellence in all we do.

(C) Copyright GRAAY® Limited 2011-2022. All rights Reserved.
Document Designation: Commercial in Confidence (Internal Team Only)

ANTI-BRIBERY POLICY STATEMENT

The risk of bribery has been assessed within GRAAY® Limited and its supply chain; the risk is considered to be low.

The control measures within the Risk Assessment and the arrangements described within the Anti-Bribery Policy Statement are considered to be suitable and sufficient measures to control the risk of bribery.

GRAAY® Limited is determined to maintain its reputation as a reputable Company, which will not tolerate fraud, corruption or abuse of position for personal gain, wherever it may be found in any area of its activities. All employees and operatives should play a key role in counter-fraud initiatives. This includes providing a corporate framework within which counter-fraud arrangements will flourish, and the promotion of an anti-fraud culture across the whole of the Company. This should provide a sound defence against internal and external abuse of Company funds.

The relevant definitions are as follows;

- **Fraud is the “intentional distortion of financial statements or other records by persons internal or external to the organisation, which is carried out to conceal the misappropriation of assets or otherwise for gain.”**
- **Corruption is the “offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person.**

All Staff are an important element in our stance on fraud and corruption and are positively encouraged and expected to raise any concerns that they may have on these issues where they are associated with GRAAY® Limited activities.

They may raise concerns through their immediate manager; however, it is recognised that if they feel inhibited in certain circumstances they may contact either the Managing Director or Sentinel Coordinator.

Concerns will be treated in confidence, properly investigated and dealt with fairly. There is, of course, a need to ensure that any investigation process is not misused, therefore, any internal abuse, such as raising malicious or vexatious allegations, may be dealt with as a disciplinary matter.

GRAAY® Limited’s anti bribery policy will be continually monitored and updated, particularly when changed in the scale and nature of our operations occur. The policy will be updated at least but not limited to once every 12 months.

Signed as Approved this day, Thursday, 08 December 2022

Signature

Position

**Mr Frank Lloyd-Murray
Chief Executive Officer**

