



ANTI-BRIBERY & CORRUPTION POLICY

January 2026

Policy Statement

EP Marine & Rail Ltd is committed to conducting all business in an honest, transparent, and ethical manner.

We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, regardless of location or circumstance.

We are committed to implementing and maintaining effective, proportionate systems to prevent bribery and corruption within our business and any work carried out on our behalf.

Legal Framework

We comply with all applicable laws relating to anti-bribery and corruption, including the UK Bribery Act 2010.

This applies to our conduct both within the UK and in any location where we undertake work.

Failure to comply with this legislation can result in severe penalties for both individuals and businesses, including fines and imprisonment.

Scope of This Policy

This policy applies to all:

- Employees
- Directors
- Subcontractors
- Any individual or organisation acting on behalf of the company

Purpose of This Policy

This policy sets out:

- The responsibilities of EP Marine & Rail Ltd and those working on its behalf
- The standards expected when dealing with clients, contractors, suppliers, and public bodies
- Guidance on recognising, avoiding, and reporting bribery and corruption

What Constitutes Bribery

A bribe is not limited to cash payments. It includes offering, giving, receiving, or soliciting anything of value or advantage intended to influence a business decision.

This may include:

- Cash or financial incentives
- Gifts or hospitality that are excessive or inappropriate
- Preferential treatment or undisclosed advantages
- Offers of work, contracts, or opportunities in exchange for influence

Prohibited Conduct

The following actions are strictly prohibited:

- Offering, promising, or giving a bribe
- Requesting, agreeing to receive, or accepting a bribe
- Making facilitation payments (unofficial payments to expedite routine actions)
- Bribing a public official or regulatory body
- Ignoring or failing to report suspected bribery

A lack of intent or misunderstanding is not a defence under the law.

Gifts & Hospitality

Gifts and hospitality must:

- Be reasonable and proportionate
- Not influence, or appear to influence, a business decision
- Be transparent and openly declared

Any gifts or hospitality that could be perceived as excessive or inappropriate must be declined.

Reporting Concerns

EP Marine & Rail Ltd is committed to encouraging openness and ensuring that concerns relating to bribery or corruption are raised and addressed appropriately. If you suspect or become aware of any instance of bribery, attempted bribery, or corrupt practice, you must report it as soon as possible.

Concerns may be raised with the CEO, William Brogden. Where this is not appropriate, concerns may be raised under the EP Marine & Rail Ltd [Whistleblowing Policy](#).

All reports will be treated seriously, handled confidentially where possible, and investigated appropriately. No individual will suffer any form of retaliation or detrimental treatment for raising a concern in good faith.

Breach of Policy

Failure to comply with this policy may result in:

- Termination of employment or contracts
- Removal from working with EP Marine & Rail Ltd
- Reporting to relevant authorities where appropriate

EP Marine & Rail Ltd reserves the right to terminate relationships with any party who breaches this policy.

Monitoring & Review

This policy will be reviewed annually and updated when required.

Status of Policy

This policy does not form part of any contract of employment and may be amended at any time.