

Control of Bribery

1st Step 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.

The purpose of this Policy Statement is to set out for all employees the main principles for countering fraud and corruption.

The Policy statement includes:-

- the scope;
- the culture and the stance against fraud and corruption;
- how to raise concerns and report financial malpractice;
- the principle of having an anti-fraud & corruption strategy;
- the responsible officer.

All employees 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."

Scope

The Policy Statement applies to all employees (full time, part time, temporary and casual) who work for 1st Step. The term "officer" includes all types of employees of 1st Step.

The company expects that individuals and organisations (e.g. suppliers, contractors, and service providers) that it deals with will act with integrity and without thought or actions involving fraud and corruption. Where relevant, 1st Step will include appropriate clauses in its contracts about the consequences of fraud, bribery and corruption; evidence of such acts are most likely to lead to a termination of the particular contract and may lead to prosecution.

Culture and Stance against Fraud & Corruption

Responsibility for an anti-fraud culture is the joint duty of all those involved in giving direction, determining policy and management. The strategy should be directed against fraud and corruption whether it is attempted against 1st Step from outside or from within its own workforce.

1st Step expects that employees at all levels will lead by example in ensuring adherence to legal requirements, contracts procedure rules, financial procedure rules, codes of conduct and best (professional) practice.

As part of this culture, the company will provide clear routes by which concerns can be raised by employees (full time, part time, temporary and casual).

Senior Management is expected to deal swiftly and firmly with those who defraud 1st Step or who are corrupt. The company, including senior management and Directors, will be robust in dealing with financial malpractice.

Raising Concerns

Although this document specifically refers to fraud and corruption, it equally applies to any forms of malpractice that can reduce confidence in 1st Step and its services, and may also include acts



committed outside of official duties but which impact upon the company's trust in the individual concerned. Examples may include the criminal acts of theft of "property", which includes all assets and cash; false accounting; obtaining by deception; pecuniary advantage by deception; computer abuse and computer crime. Also, it includes bribery and corruption. All employees can be exposed to a number of "pressures", from outside influences to act in a particular way in a particular case; this may involve "favouritism" regarding the access to all kinds of services and benefits.

The employees of 1st Step are an important element in the company stance on fraud and corruption, and they are positively encouraged and expected to raise any concerns that they may have on these issues where they are associated with the company activities.

Employees should normally raise concerns through their immediate manager, however it is recognised that they may feel inhibited in certain circumstances. In this case, employees should contact either the Managing Director or Rail Administrator.

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.

The Responsible Officer

The Responsible Officer is responsible for ensuring that the company has control systems and measures in place "to enable the prevention and detection of inaccuracies and fraud, and the ability to reconstitute any lost records". An Anti-Fraud & Corruption Policy Statement and Strategy helps towards discharging part of this responsibility.

Accordingly, The Responsible Officer will:-

- take overall responsibility for the maintenance and operation of this Policy;
- promote awareness of the principles and practices it contains;
- maintain records of financial malpractice, including concerns and allegations received, matters arising from audits, investigations and evidence and the outcomes;
- report as necessary to 1st Step.

Anti-Fraud & Corruption Strategy

This Policy Statement also forms an important part of the Anti-Fraud & Corruption Strategy by setting out the tone, culture and expectations of 1st Step, as part of the corporate framework. The Strategy involves the corporate framework, prevention, deterrence, detection and investigation, action and recovery; details of these key features are shown in the Strategy itself.

Our business risk assessment must consider bribery and corruption risks resulting from market changes, changes in products, customer base or services, and new acquisitions or major contract wins, as well as advisors and other third party service providers involved in the supply chain. Other areas to consider include our particular customers, geographical areas of operation, outsourced arrangements and the product/service type offered.

We have identified the following as areas of possible bribery:

- Corporate hospitality with high value gifts.
- Conflicts of Interest
- Data protection and information security
- Responsible use of social media
- Market abuse

We therefore will:

- Plan to provide annual training for all identified high risk staff to enable them to understand and fulfil their obligations under the legislation of the area in which they operate and in line with local anti-bribery and corruption procedures.
- Ensure that all necessary controls and communications are in place to forestall and prevent bribery and corruption, and that adequate monitoring procedures are in place.
- Ensure appropriate due diligence is carried out and fully documented on third parties. This includes ensuring that all required vetting checks are completed.
- Ensure appropriate measures are in place to enable bribery and corruption risk is taken into account in the day to day operation of the business, including in relation to the development of new products and services, the taking on of new customers/suppliers and changes in the business's profile as a result of new contract wins or acquisitions.

Following the above mentioned assessment, local procedures must be reviewed to ensure that systems and controls and staff awareness adequately reflect the risks identified during the risk assessment. Monitoring programmes will need to be reviewed accordingly.

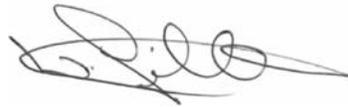
Bearing in mind the above areas of possible bribery, the management has considered that the company are at a very low risk.

This policy will be reviewed annually.

Signed;



Matthew Jones, Managing Director,



Les Fillery, Managing Director

April 2017