



Group Policy

Ethics in Business

This Policy is effective from 1st January 2023 and is subject to review if necessary.

Responsible: ATG	Status: Approved	Page 1 of 4
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Purpose of the Policy

This policy is designed to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships
- Full, fair, accurate, timely and understandable disclosure in reports and documents that Alpha Trains files with, or submits to, our regulators and in other public communications made by Alpha Trains
- Compliance with applicable governmental laws, rules and regulations

We expect all staff to take a commonsense approach particularly in situations where ethics issues and conflicts could arise.

Responsibility and Enforcement

All Alpha Trains employees are bound by this Policy, including those not directly employed such as contractors and temporary workers engaged through external providers.

Compliance with Laws, Rules, and Regulations

We are absolutely committed to conducting our business affairs with honesty and integrity and in full compliance with all applicable laws, rules and regulations. No Alpha Trains employee shall commit an illegal or unethical act or instruct others to do so for any reason.

Conflicts of Interest

So that you can undertake your job properly, maintain your objectivity and impartiality and ensure that your judgement could not be compromised, you should not put yourself in a position where your personal interests could conflict with the interests of Alpha Trains.

You have a responsibility to act in the interests of Alpha Trains and must not misuse your position or any information obtained in the course of your employment, to further your private interests - or those of anyone you have a relationship with. As conflicts of interest can arise in many different situations, you need to be vigilant so that you can identify them promptly and take appropriate action. In this way any conflicts can be avoided or properly managed.

How will I know if I have a conflict of interest?

If, in the context of performing your duties, it could be suggested that you are acting in your own interests or those of another person with whom you have a relationship, rather than in the interests of Alpha Trains, you may have a conflict of interest.

Relationships and Associations

While Alpha Trains entirely respects the right of every one of us to form friendships and personal relationships at work, there will be occasions when it will be appropriate to tell your manager about a relationship that may impact on your work by creating a conflict of interest.

Responsible: ATG	Status: Approved	Page 2 of 4
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Financial Opportunities

For these purposes, the term “financial opportunity” covers any opportunity to obtain a financial advantage or make a personal, financial gain that arises or comes to your attention in the course of your employment. This includes opportunities to make use of business information, or to invest privately in a customer’s or a supplier’s business, or in Alpha Trains’ business.

Pursuing financial opportunities arising in these circumstances could compromise you by placing you in a position where your personal interests could conflict with those of Alpha Trains.

If a financial opportunity comes to your attention or becomes available to you, before taking advantage of it you should ensure that you disclose all the relevant details to your manager.

Bribery and Corruption

You should never offer or accept any bribe or inducement, which may influence or appear to influence your actions. Nor should you misuse your position within Alpha Trains or the information you gather during your duties to further your private interests or those of anyone else. If you have a concern, please speak to your manager in the first instance.

Gifts and Hospitality

The aim of Alpha Trains’ regarding Gifts and Hospitality is to avoid prejudicing your objectivity, for instance, when a contract is in the course of negotiation.

The policy applies to gifts and hospitality received from or offered to customers, suppliers and other business contacts and is designed to avoid situations where a customer or supplier may seek to influence you. The policy also takes account of the law relating to the offering of gifts and hospitality to local authorities and other public bodies.

In all instances a commonsense approach should be adopted – for example small gifts - impersonal items of low financial value and often of a promotional nature such as typical giveaways - from customers or suppliers (actual and potential) can be accepted and kept.

On no account should you accept gifts that by their nature have the potential to cause reputational damage or embarrassment to Alpha Trains. This may include cash, cash-convertible gifts or any payment, favour or inducement that might improperly influence an official transaction.

Where entertaining is essential to your role you are allowed to offer or accept hospitality but again act on a reasonable basis and consider if your independence could be affected. Any hospitality offered or accepted must be appropriate to Alpha Trains’ business interests and should not be excessive as regards any contact, customer, supplier or other third party.

A commonsense approach should be taken as to what is ‘appropriate’ or ‘excessive’ but please consider that the hospitality must not be allowed to develop into an inappropriate personal relationship, for example, where a host provides special discount arrangements for Alpha Trains employees.

Whistleblowing

If an employee of Alpha Trains, at whatever level, reasonably suspects that unacceptable or illegal conduct has occurred or will occur he/she must advise his/her manager when he/she becomes aware of such situations.

Please refer to the separate Whistle Blowing policy for further details.