Business Ethics, Anti-Bribery & Corruption, Anti-Money Laundering and Prevention of the Facilitation of Tax Evasion Policy

Company: Train AV Ltd ("Train AV" or "the Company")

1. Purpose

This Policy sets out the principles and standards that govern ethical conduct, anti-bribery and corruption (ABC), anti-money laundering (AML), the prevention of the facilitation of tax evasion, and whistleblowing at Train AV Ltd. It ensures that Train AV conducts its business with integrity, transparency, and in full compliance with UK legislation and applicable international laws.

This Policy is designed to comply with, and be informed by, the following UK legislation: - Bribery Act 2010 - Criminal Finances Act 2017 - Proceeds of Crime Act 2002 (POCA) - Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017

2. Scope

This Policy applies to all employees, directors, officers, contractors, consultants, agents, freelancers, partners, and any other persons or organisations acting for or on behalf of Train AV ("Associated Persons"). It applies to all business activities, training services, commercial relationships, and jurisdictions in which Train AV operates.

3. Core Principles

- Train AV operates ethically and with honesty and integrity at all times.
- Bribery, corruption, money laundering, tax evasion, and the facilitation of tax evasion are strictly prohibited.
- Train AV has zero tolerance for unethical behaviour.
- All Associated Persons are required to comply with this Policy and relevant laws.

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4. Code of Conduct

4.1 Expected Standards of Behaviour

All Associated Persons must: - Act honestly, ethically, and professionally in all business dealings. - Comply with all applicable laws, regulations, and Train AV policies. - Treat customers, suppliers, partners, and colleagues with respect and fairness. - Avoid any behaviour that could damage Train AV’s reputation.

4.2 Conflicts of Interest

Associated Persons must avoid situations where personal interests conflict, or appear to conflict, with the interests of Train AV. Any actual or potential conflicts must be disclosed promptly to management.

4.3 Gifts, Hospitality and Expenses

Gifts and hospitality must: - Be reasonable, proportionate, and infrequent. - Have a genuine and transparent business purpose. - Never be intended to influence, or be perceived as influencing, a business decision. - Never be offered or accepted in cash or cash equivalents.

Gifts or hospitality involving public officials require prior management approval.

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5. Anti-Bribery and Corruption

5.1 Prohibition of Bribery

In accordance with the Bribery Act 2010, Train AV prohibits: - Offering, promising, giving, requesting, or accepting bribes. - Bribery of public officials or private individuals. - Facilitation payments of any kind, regardless of local custom. - Indirect bribery through third parties or intermediaries.

5.2 Third Parties and Due Diligence

Train AV will conduct proportionate, risk-based due diligence on third parties and will not engage with any party where bribery or corruption risks cannot be adequately mitigated.

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6. Anti-Money Laundering (AML)

6.1 Money Laundering Offences

Money laundering includes concealing, disguising, converting, transferring, or using the proceeds of crime, as defined under the Proceeds of Crime Act 2002. Train AV prohibits any involvement in money laundering activities.

6.2 AML Controls

Train AV will: - Apply risk-based due diligence to customers, suppliers, and partners. - Maintain accurate, complete, and transparent financial records. - Monitor transactions for unusual or suspicious activity. - Report suspicious activity where legally required.

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7. Prevention of the Facilitation of Tax Evasion

7.1 Legal Framework

Under the Criminal Finances Act 2017, it is a criminal offence for a company to fail to prevent the facilitation of tax evasion. Train AV is committed to implementing reasonable prevention procedures.

7.2 Prohibited Conduct

Associated Persons must not: - Deliberately or knowingly facilitate tax evasion. - Assist in the creation or use of false documentation or arrangements to evade tax. - Ignore, conceal, or fail to report suspected tax evasion.

7.3 Reasonable Prevention Procedures

Train AV’s procedures include: - Regular risk assessments. - Proportionate due diligence on Associated Persons and third parties. - Clear reporting channels. - Ongoing training and awareness.

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8. Whistleblowing

8.1 Policy Statement

Train AV encourages the reporting of concerns relating to unethical behaviour, bribery, corruption, money laundering, tax evasion, or any other serious wrongdoing. Reports can be made without fear of retaliation.

8.2 Protected Disclosures

In accordance with the Public Interest Disclosure Act 1998, whistleblowers who raise concerns in good faith will be protected from dismissal, victimisation, or other detriment.

8.3 How to Raise a Concern

Concerns should be raised as soon as possible and may be reported: - Directly to a Director or senior manager - In writing via confidential email or letter

Reports may be made anonymously where appropriate and will be handled sensitively and confidentially.

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9. Reporting and Responsibilities

9.1 Responsibilities

- **Directors / Management:** Overall responsibility for implementation, oversight, and enforcement of this Policy.
- **Employees and Associated Persons:** Responsibility to understand and comply with this Policy.

9.2 Failure to Comply

Breaches of this Policy may result in disciplinary action, termination of contract, and potential legal action.

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10. Training and Awareness

Train AV will provide proportionate training and guidance to ensure understanding of ethical, ABC, AML, and tax evasion prevention responsibilities.

11. Review and Monitoring

This Policy will be reviewed at least annually and updated as necessary to reflect changes in legislation, guidance, or business activities.

Approved by: Directors, Train AV Ltd
Effective Date: 3rd December 2025
Next Review Date: 3rd December 2025