



# Anti-Bribery Policy

It is the policy of Doctore On Track Training Services Ltd to not participate in the activity of receiving or giving bribes as per the Bribery Act 2010. It is recognised that such activity is illegal and can play no part in the way in which Doctore On Track Training Services Ltd operates as a business. This policy applies to all personnel, permanent or temporary. It also applies to Doctore On Track Training Services Ltd supply chain partners, including advisors, consultants, sub-contractors and agents (together “associated persons”).

This policy includes:

- Not engaging in any form of bribery or corruption
- Not offering, providing, authorising, requesting or receiving bribes, or any activity that could be perceived as a bribe
- Only contracting with associated persons who demonstrate integrity and practice ethical conduct and meet the standards in this policy, including all applicable laws and regulations
- Prohibiting all personnel and associated persons from offering, making or paying any “facilitation payments” to any third party. All personnel must report to the Managing Director any request by a third party for a facilitation payment
- Not using funds and resources to contribute to any political campaign/party/candidate or any affiliated organisation with the intention of obtaining a business or any other advantage in the conduct of business. This includes using charitable donations as a substitute for political payments
- Only making charitable donations or sponsorships on behalf of Doctore On Track Training Services Ltd for genuine charitable purposes and where such activities are aligned with Doctore On Track Training Services Ltd values and ethics
- Ensuring all personnel in commercial, customer or supply chain facing positions receive appropriate training on anti-bribery compliance

Doctore On Track Training Services Ltd considers a breach of this policy as a serious offence; any individual/s in violation of this policy shall be dealt with in line with our Disciplinary Procedure and could result in gross misconduct. Breach of this Act may also incur penalties including fines and/or imprisonment being enforced against the individual/s by the police.

A breach could include:

- a) Accepting a bribe of any kind
- b) Requesting a bribe of any kind
- c) Offering a bribe of any kind
- d) Not reporting the acceptance or giving of a gift within the company to a manager.

This policy shall be reviewed annually in line with government legislation to ensure compliance along with completion of the annual Bribery and Corruption Self-Assessment. (OTP/F/046)

Signed

Managing Director  
31<sup>st</sup> December 2024