

Anti fraud and corruption policy and procedures

thetrainline.com will take all reasonable practicable steps to protect against fraud and corruption within thetrainline.com and from external sources.

Definitions

- fraud means the illicit gaining of cash or other benefit by deception.
- corruption means the dishonest influence of actions and decisions.

Scope

This Anti Fraud and Corruption policy forms part of thetrainline.com's internal control and Corporate Governance arrangements.

The policy explains thetrainline.com's underlying approach to combating fraud and corruption, and details the roles and responsibilities of the Executive Team and other key parties.

The key elements of thetrainline.com's strategy to combat fraud and corruption include:

- an open and honest corporate culture
- adequate preventative measures
- systems for detection and investigation
- understanding and awareness of fraud and corruption issues within thetrainline.com
- the adoption of a "whistleblowing" policy (see separate section in this handbook)

Expectations and responsibilities

The Chief Executive Officer, the Executive Team and staff at all levels are expected to behave with integrity and propriety and to act within the regulations, procedures and practices laid down in relation to the conduct of thetrainline.com's business. thetrainline.com believes this is best achieved through the promotion of an atmosphere of honesty and openness.

The Executive Team encourages members and staff to raise any concerns they may have about fraud and corruption immediately they occur. It will treat all concerns raised seriously and in confidence.

Making suspicions known

Any concerns should be raised with your manager or any of the Executive Team. More detailed guidance and advice on how to raise any concerns is contained within the Whistleblowing Policy elsewhere in this Handbook.

If anyone feels they are unable to raise their concerns through any of the above routes or if they are unsure whether or how to raise a concern or they want confidential advice, they can contact the independent organisation Public Concern at Work on 020 7404 6609, 9am to 6pm, Monday to Friday or at helpline@pcaw.co.uk. Their lawyers can give you free confidential advice on how to raise a concern about serious malpractice at work. For additional information on Public Concern at Work and how it might help you, please visit www.pcaw.co.uk.

Prevention

The adoption of proper and adequate measures to prevent fraud and corruption are the responsibility of the Chief Executive Officer, the Executive Team, and other managers.

Policies and procedures framework

All Executive Team members and staff need to be aware of, and have ready access to, thetrainline.com's agreed policies and procedures. These are available on The Source (including this Handbook). thetrainline.com staff should also observe any relevant professional codes.

References will be taken up for all permanent and temporary staff to verify their suitability, honesty and integrity.

Systems

thetrainline.com has and will maintain in place systems and procedures that incorporate internal controls including adequate segregation of duties. This will ensure that, as far as possible, errors, fraud and corruption are prevented.

A dedicated fraud management team exists as part of the anti-fraud strategy. The primary role of the team is to prevent online credit card fraud in thetrainline.com by using a sophisticated suite of automated and manual systems and processes. More information regarding this team is available from the Head of Fraud Management.

The Executive Team and other managers are responsible for ensuring that appropriate internal controls are properly maintained including compliance with appropriate Payment Card Industry Data Security Standards requirements (PCI-DSS).

Prevention

Concerns should be reported in accordance with the Whistleblowing policy. A detailed investigation of any concerns raised will be undertaken by the Executive Team and thetrainline.com will deal with any instances of fraud and corruption swiftly. Disciplinary action and other appropriate measures will be taken as necessary, including working with the police or other authorities as appropriate.

In the event that fraud is suspected on the part of contractors, partners, employees or by staff involved in agency/contract work on behalf of other organisations, procedures and responsibilities for reporting and initial investigation are the same as for thetrainline.com staff. thetrainline.com will inform and involve contractors, partners or agencies, where appropriate.

Where thetrainline.com funds/assets have been put at risk or lost due to a suspected breakdown in thetrainline.com policies and procedures, the Group Finance Director may instruct the Risk and Compliance Manager to investigate the fraud.

Awareness

thetrainline.com recognises the continuing effectiveness of the Anti Fraud and Corruption Strategy depends largely on the awareness and responsiveness of the Executive Team, other management and thetrainline.com staff. All staff are made aware of the strategy when they join thetrainline.com, they receive a copy of this Handbook for inclusion in their personal records, and in addition have ready access to all other relevant documents, policies and procedures which regulate thetrainline.com's activities.

Action will be taken on a regular basis to remind both Executive Team and staff of the importance of the thetrainline.com places on avoiding and preventing fraud and corruption

Employees should also be familiar with the provisions of the thetrainline.com's Whistleblowing Policy, and Gifts and Hospitality Policy shown elsewhere in this Handbook.