



ANTI-CORRUPTION AND BRIBERY POLICY

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ANTI-CORRUPTION & BRIBERY POLICY

Contents

- 1.0 Overview**
- 2.0 Our commitment and your obligations**
- 3.0 What is bribery?**
- 4.0 What is corruption?**
- 5.0 What is allowed?**
- 6.0 What are kickbacks and facilitation payments?**
- 7.0 Keeping records**
- 8.0 Breaches of this policy**

ANTI-CORRUPTION & BRIBERY POLICY

1.0 Overview

- 1.1 This policy outlines the responsibilities of RHS (and everyone who works for RHS) to adhere to the high standards we have set for conducting our business affairs. You will find specific guidance in this policy on recognising and addressing bribery and corruption, whether in the UK or overseas.
- 1.2 The policy applies to employees at all levels, contractors, consultants, officers, interns, casual and agency workers, and anyone else under our control. It does not form part of your contract of employment and can be amended at any time.

2.0 Our commitment and your obligations

- 2.1 RHS is committed to absolute integrity and fairness across all our operations and accordingly will not tolerate any activities involving bribery or corruption.
- 2.2 If you are employed or engaged by RHS, or in any other way under our control, you are obliged to take responsibility for preventing, detecting, and reporting anything you believe amounts, or could amount, to bribery or corruption.
- 2.3 You must report any conduct or activity that you suspect amounts to bribery or corruption to your Line Manager or the Chief Executive. Please consult our policy on whistleblowing for further information about raising concerns.
- 2.4 You can be confident that RHS will never penalise anyone who refuses to become involved in bribery or corruption or who flags up their concerns to us in good faith. Should you suffer any retributive treatment in this context, you must talk to your Line Manager. You can raise the matter formally under our Grievance Policy if you are not satisfied that it has been resolved informally.

3.0 What is bribery?

- 3.1 RHS defines **bribery** as a reward or inducement for acting improperly to gain an advantage, whether personal, commercial, or regulatory. You do not need to have actually given or received the reward or inducement for this process to amount to bribery.
- 3.2 A bribe does not need to involve the promise, or actual payment, of money — offering hospitality, entertainment or gifts can also be classed as bribery if the purpose is to exert influence.
- 3.3 You may face up to 10 years' imprisonment for offering, promising, giving, asking for, or accepting a bribe as this is a criminal offence. RHS may also face sanctions if we fail to stop bribery taking place.
- 3.4 The following list includes the most common actions we consider to be bribery, but it is not exhaustive. You must not become involved in any of them or allow anyone else to become involved on your behalf. They are:

ANTI-CORRUPTION & BRIBERY POLICY

- promising, offering or giving money, hospitality or gifts in the expectation that you will receive a business advantage or because you have already done so.
- accepting or giving hospitality or gifts in the course of commercial negotiations of any kind, including tender processes, if there is any doubt about whether doing so could have an impact on the outcome.
- accepting money, gifts or hospitality from anyone you suspect is in return seeking a business advantage.
- accepting hospitality that is excessively extravagant for the context in which it is offered.
- offering gifts without your manager's express approval to government or other officials, political parties, and individual politicians.
- receiving gifts without your manager's express approval from government or other officials, political parties, and individual politicians.
- offering or receiving gifts in return for the faster or smoother conclusion of a routine transaction or process.
- retaliating against or threatening anyone who refuses to bribe a third party.
- retaliating against or threatening anyone who raises concerns under the policy.
- taking part in any other activity or process that might otherwise breach this policy.

4.0 What is corruption?

RHS defines **corruption** as the abuse of power, authority, or position in return for some personal advantage.

5.0 What is allowed?

5.1 Offering or receiving hospitality and entertainment from third parties is allowed under this with guidance and further information available in the Gifts & Hospitality policy provided that it is appropriate and reasonable in the circumstances and the purpose is to:

- build or maintain business relationships.
- enhance or maintain RHS's reputation.
- help market RHS's services more effectively.

5.2 You may also give and accept gifts, but only if you observe the following conditions:

- you are not giving or receiving the gift a bid to influence a business decision.
- you are not giving or receiving the gift as a reward for new business or retaining existing business.
- you are not giving or receiving the gift in return for any other benefits or favours;
- you are giving the gift on behalf of RHS and not in your own name.
- you are not giving cash or any kind of cash equivalent, such as vouchers.
- your gift is appropriate for the context — eg, a small gift offered at Christmas.
- your gift is not given in secret.
- the gift is worth no more than £50
- your action complies with local laws.
- you have your Line Manager's prior approval in every case.

5.3 For the avoidance of any doubt, it is generally acceptable to give or receive low-value business-related gifts, eg branded umbrellas.

5.4 You can reimburse a third party for business-related expenses — the costs of attending a meeting, for example — and you can also accept a third party's offer to pay your expenses.

ANTI-CORRUPTION & BRIBERY POLICY

Although this does not normally constitute bribery, any payment made or received that exceeds reasonable or genuine business expenses is not acceptable. An example would be payment for an extended stay in a hotel before or after business had been concluded.

6.0 What are kickbacks and facilitation payments?

6.1 RHS defines **kickbacks** as payments made in return for a business advantage or favour.

6.2 RHS never makes or receives kickbacks or facilitation payments as defined below.

6.3 RHS defines **facilitation payments** as unofficial payments, usually small, made to speed up or smooth out a routine process or activity. They are sometimes described as 'back-handers', and recipients typically include government or other officials.

6.4 You must avoid being put in a position where you might be asked to make or accept a kickback or facilitation payment on RHS's behalf. You must also avoid being put in a position from where it could be inferred that such a payment was available.

6.5 If anyone asks you to make a payment on behalf of RHS, you must consider carefully whether what is being asked for is in proportion to the goods or services involved. Always ask for a receipt, and if you have any concerns, you must discuss them with your Line Manager or the Chief Executive without delay.

7.1 Keeping records

7.1 You must keep written records of any gifts or hospitality you have given or received and declare these. All associated expenses claims must give full details of the reason for the expenditure and be submitted to RHS using the process laid out in our expenses policy.

7.2 Invoices and other records relating to third-party dealings, including those with customers and suppliers, must be accurate and complete. You must never maintain 'off-book' accounts to conceal or facilitate payments of any kind.

8.0 Breaches of this policy

8.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

8.2 RHS may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.