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## Definitions

In this policy “we”, “us” and “the company” mean Red Rhino Resourcing.

“Relevant Person” means any individual (an officer or employee of the Company, or a temporary worker, contractor or consultant providing services to or on behalf of the Company) or any corporate entity who performs functions for or on behalf of the Company.

## Policy Statement

Red Rhino Resourcing (RRR) values its reputation and is committed to promoting and maintaining the highest level of ethical standards in relation to all of its business activities. The actions and conduct of the company’s staff as well as others acting on the firm’s behalf are key to maintaining these standards. The Company therefore has a zero-tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems to counter bribery.

## Purpose and scope of this policy

To set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption and provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years’ imprisonment and/or a fine. As an employer if we fail to prevent bribery or corruption within our business, we can face an unlimited fine, exclusion from tendering for public contracts, and damage to our reputation. Therefore, we take our legal responsibilities very seriously.

## Who must comply with this policy?

The policy applies strictly to all employees, directors, agents, consultants, contractors, external consultants, third-party representatives, business partners, sponsors, and to any other persons or bodies associated with RRR, within all regions, areas, and functions.

## The Bribery Act 2010

The Bribery Act 2010 (the Bribery Act) came into force on 1 July 2011. The Bribery Act affects the Company in its business relations anywhere in the world.

Under the Bribery Act it is an offence to:

- Bribe a person i.e., to offer, promise or give a financial or other advantage to another person, whether within the UK or abroad, with the intention of inducing or rewarding improper conduct.
- Receive a Bribe i.e., to request, agree to receive or accept a financial or other advantage for or in relation to improper conduct.
- Bribe a foreign public official.
- Fail to prevent Bribery.

### Understanding and recognising bribery and corruption.

Bribery is offering, giving, promising, or receiving a financial or other advantage in connection with the "improper performance" of a position of trust, or a function that is expected to be performed impartially or in good faith. Bribery does not have to involve cash, or an actual payment exchanging hands and can take many forms. For example, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

The types of bribery that take place are numerous, some simple examples follow:

- bribery in order to secure or keep a contract.
- bribery to secure an order.
- bribery to gain any advantage over a competitor.
- bribery of a local, national, or foreign official to secure a contract.
- bribery to turn a blind eye to a health safety issue or poor performance or substitution of materials or false labour charges.
- bribery to falsify an inspection report or obtain a certificate.

Corruption is dishonest behaviour by those in positions of power, abusing their position for private gain.

### What you must not do.

It is unacceptable for you or someone on your behalf to;

- Offer, give, promise, or receive a financial or other advantage with the intention of inducing or rewarding improper conduct.
- Give or accept a gift to reward a business advantage already given.
- Give or accept a reward during any business negotiation or tender process if it could be perceived as an attempt to influence the outcome.
- Accept a gift or reward from a third party that you suspect or know is offered with an expectation that it will provide a business advantage for the giver or anyone else in return.
- Accept hospitality that is excessively lavish or extravagant under the circumstances.
- Give or accept a gift to or from a government official/representative or politicians/political parties without prior approval from senior management.
- Intimidate, threaten, or retaliate towards another individual who has refused to conduct a bribery offence or an individual who has raised concerns under this policy.
- Engage in any other activity that could lead to a breach of this policy.

### Facilitation payments

Facilitation payments are usually defined as small bribes paid to facilitate routine Government action. Although this is not a practice usual within the company's industry sector, employees should be aware that in certain countries, such payments to government officials are customary business practice in order to facilitate a routine action or process. However, facilitation payments are illegal within the UK. The Act makes no distinction between facilitation payments and bribes regardless of the local business customs or culture.

### Promotional Gifts

There are circumstances and occasions where gifts are appropriate when considering the reason for the gift and value. For example, it is customary in the United Kingdom to distribute small gifts during the festive period, surrounding Christmas. This is only when gifts are presented openly and not given in secret.

We will not provide gifts to any client, contractor, supplier, or other third party with the intention of persuading the recipient to act improperly, or where that intention might be perceived by the recipient.

This policy does not prohibit employees from accepting low value promotional gifts or merchandise (for example, pens, diaries & calendars), whether given to them personally, or received through the post, unless the employee regards the gift (including the accumulation of a series of low value gifts), as an intention of

inducing or rewarding improper performance. Employees must obtain authorisation from senior management before giving any such gift to any recipient.

The company may from time to time ask employees to distribute low value gifts to clients, contractors, or other relevant third parties, in line with standard industry marketing practices. However, employees require pre-authorisation from senior management to distribute a gift with a value greater than £20.

### **Responsibility to report incidents**

All Relevant persons have a responsibility to prevent, detect and report any incident or potential risks of bribery and corruption. If you know or suspect that any relevant person plans to offer, give, promise, or receive a financial or other advantage, with the intention of inducing or rewarding improper conduct, then you must report this to the Senior Management team as quickly as possible to ensure appropriate action can be taken promptly.

The company is committed to dealing with all matters of bribery and corruption appropriately. This could include reporting the matter to the relevant external government department, regulatory agency, the police and/or through internal investigations resulting in disciplinary action being taken against relevant employees.

Any investigation conducted by the company will be kept strictly confidential to the extent that it is practical and appropriate in the circumstances. The company will provide support to anyone who raises a genuine concern under this policy, even if the concern turns out to be mistaken.

### **Record Keeping**

All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off the record" to facilitate or conceal improper payments.

### **Monitoring Compliance**

The Company's Senior Management team has primary responsibility for ensuring compliance with this Policy and will review its contents on a regular basis. They will be responsible for monitoring its effectiveness and ensuring that this Policy complies with the Company's legal and ethical obligations.

### **Sanctions for breach of this policy**

Breach of this policy by an employee or officer of the company will constitute a disciplinary offence and will be dealt with in line with the company's disciplinary procedure. Depending on the severity of the offence, it could be treated as gross misconduct and therefore result in the employee or officer being dismissed.

Breach of this policy by a temporary worker or contractor may lead to immediate termination of terms of engagement with the company.

Breach of this policy by a relevant person who is a corporate entity could lead to the suspension and termination of any relevant contract, sub-contract or any other type of agreement or engagement between the corporate entity and the company.

### **Queries/Amendments**

Any queries should be addressed to the Managing Director of Red Rhino Resourcing. Any amendments made to this policy will be notified by revision of this document.