

## **RSC ANTI BRIBERY AND CORRUPTION POLICY STATEMENT 2017**

Bribery and corruption is a criminal offence under the Bribery Act 2010 (the “Act”) and can be damaging to legitimate business interests. This has a detrimental impact on business by undermining good governance and distorting fair and open competition.

RSC Associates Limited (‘RSC’) is committed to supporting the aims of the Act, acting ethically and with integrity in all our business dealings and relationships, implementing and enforcing effective systems and controls to ensure bribery and corruption is not taking place anywhere in our own business or those of our contractors or suppliers.

The purpose of this document is to set out RSC’s policy in relation to bribery and corruption, a policy that applies to all employees, directors, agents, consultants, contractors, customers and to any other people or bodies associated with RSC, irrespective of their location.

In essence RSC is committed to:

- A zero-tolerance approach to bribery and corruption
- Acting in a fair, ethical and honest manner with all our employees and business associates
- Maintaining a rigid anti-bribery and corruption policy
- Upholding all national and international laws in respect of bribery and corruption

We conduct all our business in an honest and ethical manner and we want to ensure that all our associates and business partners do likewise.

RSC is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on the company’s behalf is responsible for maintaining the company’s reputation and for conducting business honestly and with complete professional integrity.

RSC carries out all of our business activities in a transparent and ethical way and has zero tolerance in regard to any form of bribery or corruption, whether direct or indirect, by any of its directors, employees, officers, customers, agents, consultants, sub contactors or any persons or companies acting on our behalf.

Where necessary we are prepared to undertake due diligence on 3rd parties to ensure they operate to the highest ethical standards and that any actions undertaken by them will not compromise the company or damage our reputation by association. The directors and senior management are committed to implementing and enforcing effective systems to prevent and eliminate bribery in accordance with the Act.

RSC have issued an anti-bribery and corruption policy. This policy covers the receipt or giving of gifts and corporate hospitality and outlines the company's position in regard to preventing and prohibiting bribery and corruption. The policy applies to all employees and business associates.

A bribe is defined as a financial advantage or other reward offered, given, or received by an individual or company either directly or indirectly to induce or influence an individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for, or on behalf of, RSC are strictly prohibited from making, soliciting or receiving bribes or unauthorised payments. As part of our anti-bribery measures, RSC only accepts transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure, whether given or received. A breach of the policy by any director or employee will be considered as an act of gross misconduct and may, if proven, result in summary dismissal. Directors, employees and other individuals acting for RSC are aware that bribery is a criminal offence that may result in a custodial sentence and personal fine as well as an unlimited fine for the company.

RSC will not conduct business with suppliers, sub-contractors, agents or representatives that do not support appropriate anti-bribery and corruption policies as the success of RSC's anti bribery and corruption measures depends on all employees, customers, sub-contractors and suppliers adhering to this policy. The prevention, detection and reporting of bribery or corruption is the responsibility of all employees. If any employee becomes aware or suspects that an activity or conduct which is proposed or has taken place, is a bribe or corrupt, then they have a duty to report this.

All employees and others acting for, or on behalf of, RSC are encouraged to report any such incidence in accordance with the procedures set out in the policy or in the case of 3rd parties to a director or officer of the company.

We encourage whistle-blowers and we will unequivocally support any individual who, in good faith, contacts us to report any suspicious incidences of malpractice or wrongdoing regarding this policy. All such reports will always be treated in the strictest confidence.

**Ian Martin**

Managing Director

RSC Associates Limited