



ANTI-BRIBERY POLICY & PROCEDURE

Introduction

Bribery is the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Bribery is a criminal offence. Any company that forms part of the RIFT Group (the “Company”) prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us, and we have a zero-tolerance attitude towards corrupt activities of any kind, whether committed by our employees or by third parties acting for or on behalf of the Company.

The purpose of this policy is to convey to all employees and interested parties of the Company, the rules in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that the Company conducts its business in a fair, professional and legal manner.

We will encourage the application of this policy where our business involves the use of third parties e.g. suppliers; contractors.

Offences

It is a criminal offence to:

- offer a bribe
- accept a bribe
- bribe a foreign official
- as a commercial organisation, to fail to prevent a bribe.

If found guilty by a court of committing bribery, individuals could face up to 10 years in prison and/or an unlimited fine. The Company could also face prosecution and be liable to pay a fine.

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business giving or receiving money, gifts, meals, entertainment or anything else of value as an inducement to a person to do something which is dishonest or illegal.

Policy

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or organisation in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in their capacity as a foreign public official. Individuals should not make a payment to a third party on behalf of a foreign public official.

If an employee or person working on our behalf is offered a bribe, or a bribe is solicited from them, they should not agree to it unless their immediate safety is in jeopardy. They should immediately contact the Managing Director so that the matter can be investigated accordingly.

If an employee or person working on our behalf, suspects that an act of bribery, or attempted bribery, has taken place (even if they are not personally involved) they are expected to report this to the Managing Director so that the matter can be investigated accordingly.

The People Team has the primary responsibility for the investigation of all suspected bribes as defined in this policy.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

The Company will:

- ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately;
- take any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise; and
- uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in dismissal (in the case of an employee), or the cessation of our arrangement (in the event of self-employed contractor or an agency worker).

Employees are reminded of the Company's Whistleblowing Policy & Procedure.

Gifts and hospitality

We realise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation.

Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

When giving gifts, gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret. Gifts must be given in the Company's name only. Promotional gifts with a value of £20 or less such as branded stationery may be given to existing customers, suppliers and business partners without seeking prior authorisation.

When receiving gifts, gifts must not include cash or cash equivalent (such as vouchers). Promotional gifts with a value of £20 or less may be accepted without seeking authorisation.

Employees must declare and keep a written record of **all** hospitality, or gifts given or received. They must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with the Expenses Policy & Procedure and record the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

Amendments to this policy

This policy is non-contractual and may be amended from time-to-time in line with changes to legislation and best practice.