

RSC Anti-Bribery Policy – Members

The Bribery Act 2010 imposes criminal liability on individuals and organisations in the event that employees, subsidiaries, agents or consultants pay or accept bribes in relation to the organisation's business anywhere in the world.

The Senior Management Team and Board of Trustees are fully committed to ensuring that the RSC operates as an ethical organisation. Bribery or corruption in any form will not be tolerated. We expect our employees, stakeholders, members and business partners to conduct business in a fair, honest and ethical manner at all times.

The RSC prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement

to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company

by any individual employee, agent, member or other person or body acting on the RSC's behalf

in order to gain any commercial, contractual or regulatory advantage for the RSC in a way which is unethical

or in order to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual

The RSC recognises that market practice varies across the territories in which we do business and what is normal and acceptable in one place may not be in another. This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly declared and recorded:

- normal and appropriate hospitality
- the giving of a ceremonial gift on a festival or at another special time
- use of any recognised fast-track process that is available to all on payment of a fee
- the offer of resources to assist a person or body to make a decision more efficiently, provided that they are supplied for that purpose only.

Inevitably, decisions as to what is acceptable may not always be easy. If at any time you are in doubt as to whether a potential act constitutes bribery, the matter should be referred to a responsible person within the RSC.

The prevention, detection and reporting of bribery is the responsibility of each individual working on behalf of the RSC. The RSC operates a zero-tolerance approach to any attempts at bribery by, or of, its employees and associated persons and **encourages all such individuals to report any suspected bribery activity to a responsible person within the RSC**. You will be fully supported if you make a report of suspected bribery in good faith even if, following an investigation, there is no finding that bribery took place.

In the event of any bribery activity being suspected, the RSC will carry out a full investigation and if any bribery activity is discovered, the RSC may:

- in relation to employees, invoke its disciplinary procedures, which could result in a finding of gross misconduct and immediate dismissal, or
- in relation to members, refer the matter to the Disciplinary Committee.

If you have any concerns or queries in relation to this Anti-Bribery Policy or your obligations, please make these known to a responsible person within the RSC.