

Anti-bribery Policy - Procedure

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This policy reflects legislation and official guidance at the time it was last reviewed. Any changes in legislation will take precedence over anything printed in this policy. Where other policies are referred to they can be viewed on the Policy Library.

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Links with other school policies and practices

This policy links with the following other RSN procedures:

- Gifts and hospitality
- Whistleblowing
- Disciplinary procedure

1. Introduction

- 1.1 This document sets out the RSN's policy on anti-bribery and the procedure to be applied.
- 1.2 Bribery is a criminal offence. The RSN 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 employees or by third parties acting for or on behalf of the RSN.
- 1.3 This Procedure must be read in conjunction with the RSN's Anti-bribery Policy and the RSN's Anti-bribery Schedule.

2. Scope

- 2.1 The Policy and Procedure set out in this document applies to all RSN employees and contractors working on behalf of the RSN.
- 2.3 It is prohibited, directly or indirectly for any employee or person working on our behalf to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the RSN, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

3. Procedure

- 2.1 If we suspect that you have committed an act of bribery or attempted bribery, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken against you which may result in your dismissal, or the cessation of our business arrangement with you.
- 2.2 If you, as an employee or person working on our behalf, suspect that an act of bribery or attempted bribery has taken place, even if you are not personally involved,

you are expected to report this to the Chief Executive or if the incident involves the Chief Executive the Chair. You may be asked to give a written account of events.