



# ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Red Industries Group (Red) is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. Red has zero tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships wherever in the country we operate.

We are bound by the laws of the UK, including the Bribery Act 2010, regarding our conduct both at home and abroad.

## The Bribery Act 2010

The Bribery Act 2010 sets out the circumstances in which any employee of RED may commit an offence of Bribery.

Any payment to someone that is intended to make them do something that they shouldn't (called "improper performance" in the Act) is a bribe. The person giving and the person accepting are both acting illegally. The payment doesn't even have to actually be made. Just promising or asking for it is against the law.

The offences covered by the act are set out in the table below: Offence	Description	Penalty
Making a bribe	An advantage is offered, promised, or paid, with the intention of inducing a person* to act in an improper way, or in reward for improper performance. This would also include facilitation or 'grease' payments designed to speed up official business.	10 years' imprisonment, unlimited fine and confiscation of benefits.
Receiving a bribe	A person* asks for, agrees to receive, or receives an advantage in order to act improperly, or in reward for having acted improperly.	10 years' imprisonment, unlimited fine and confiscation of benefits.
Failure to prevent bribery	A company fails to prevent employees or any other 'associated person' from engaging in bribery for the benefit of the company, wherever in the world it occurs. The only available defence against this is to demonstrate that the company has 'adequate' procedures in place.	Unlimited fine and confiscation of benefits.

\*this applies to any legal person and therefore can include the company itself and the directors as the 'controlling minds' of the business.

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It is also important to understand that the act has an extra-territorial reach. This means that, for British companies like RED, it doesn't matter where in the world the offence was committed; the company or the individual can still be prosecuted in the UK for engaging in bribery or failing to prevent it.

The act also applies to 'associated persons' which is an intentionally broad term. It captures any person acting on behalf of the company irrespective of their legal connection to the company.

The directors or senior officers of a member firm can also be prosecuted personally for offences committed by individuals whilst working for the company.

### **Guiding Principles**

This policy applies to all employees.

When referring to third parties, this applies to any individual or organisation RED works with or has the potential to work with.

All third-party arrangements are stipulated within contractual agreements, which specifies the third party to comply with the minimum standards and procedures relating to anti-bribery and corruption.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Chief Financial Officer.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. RED has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

### **Gifts and hospitality**

Red accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate). It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value, as pre-determined by the Chief Financial Officer.
- It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the Chief Financial Officer.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Chief Financial Officer, who will assess the circumstances.

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RED recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

As good practice, gifts given and received should always be disclosed to the Chief Financial Officer. Gifts from suppliers should always be disclosed.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Chief Financial Officer should be sought.

### **Facilitation Payments and Kickbacks**

Facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. They tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

Kickbacks are typically made in exchange for a business favour or advantage.

RED does not allow any form of facilitation payment or kickback.

Employees may face a situation where avoiding a facilitation payment or kickback may put them or their family's personal security at risk. Under these circumstances, you must raise this immediately to your line manager.

### **Political Contributions**

Political contributions can be perceived as an attempt to gain an improper business advantage. Therefore, RED does not make any donations, whether in cash, kind, or by any other means, to support any political parties or candidates.

### **Charitable Contributions**

RED accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the People Team.

### **How to raise a concern**

If you suspect that there is an instance of bribery or corrupt activities or you have been offered a bribe by anyone or are asked to make one, you must raise this immediately to your line manager or the Chief Financial Officer.

If you do not feel comfortable raising this directly, all employees are able to use the Company's Whistleblowing policy to vocalise their concerns confidentially.

RED understands that you may feel worried about potential repercussions if you refuse a potential act of bribery or corruption. We will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

RED will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, threats, or unfavourable treatment in relation to the concern the individual raised.

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### **Training and Communication**

RED will provide training on anti-bribery as part of an employee's onboarding process. Employees will also receive regular and relevant training.

RED's zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third parties at the outset of business relations, and as appropriate thereafter.

### **Record keeping**

RED will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to managerial review.

### **Data Protection**

When managing an employee's allegations or concerns regarding corrupt behaviour and the offering or accepting of bribes, the Company processes personal data collected in accordance with its GDPR Policy.

Data collected from the point at which an employee makes an allegation or informs the Company of their concerns regarding a colleague's corrupt behaviour and the offering or accepting of bribes is held securely and accessed by, and disclosed to, individuals only for the purposes of managing the process and outcome of the allegation.

### **Miscellaneous**

This procedure will be periodically reviewed. Any amendment to it will be notified to employees in writing by the organisation's Group HR Manager and such written advice will inform employees as to the date when any amendment comes into effect.

I have read and understand the Anti Bribery and Anti-Corruption Policy.

Print Name

Signature

Date

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