

# Anti-Bribery Policy

## Introduction

The Bribery Act 2010 came into force on 1 July 2011 and creates a framework of five criminal offences:

- Giving, promising, and offering of a bribe
- Agreeing to receive or accept a bribe
- Bribing a foreign official
- Failure of commercial organisations to prevent bribery

A senior officer of a commercial organisation consenting to or conniving in an act of bribery LRWA will conduct business in an honest and ethical manner. LRWA takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships, wherever it operates, and implementing and enforcing effective systems to counter bribery.

LRWA will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it conducts business, including, in the UK, the Bribery Act 2010, which applies to conduct both in the UK and abroad.

## Scope

This Policy applies all 'Direct Contacts' with LRWA including and not exclusive of; members, people going through training, freelancers working on behalf of LRWA, directors and board members. Gifts and hospitality

This policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from Third Parties unless otherwise specifically stated. However, any gift or hospitality:

- must not be made with the intention of improperly influencing a Third Party or Worker to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits
- must comply with local law in all relevant countries
- must be given in the name of the organisation, not in an individual's name
- must not include cash or a cash equivalent
- must be appropriate in the circumstances
- must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift
- must be given openly, not secretly

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LRWA appreciates that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable both in the UK and any other relevant country. The intention behind the gift should always be considered. It is not acceptable for an employee (or someone on their behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that they or LRWA will improperly be given a business advantage, or as a reward for a business advantage already improperly given
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure
- accept payment from a Third Party where it is known or suspected that it is offered or given with the expectation that the Third Party will improperly obtain a business advantage
- accept a gift or hospitality from a Third Party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by LRWA in return
- threaten or retaliate against another member of staff who has refused to commit a bribery offence or who has raised concerns under this policy
- engage in any activity that might lead to a breach of this policy

### **Facilitation payment and 'kickbacks'**

LRWA does not make, and will not accept, facilitation payments or "kickbacks" of any kind, such as small, unofficial payments made to secure or expedite a routine government action by a government official, or payments made in return for a business favour or advantage.

### **Charitable donations and sponsorship**

LRWA only makes charitable donations and provides sponsorship that are legal and ethical under local laws and practices and which are in accordance with LRWA's internal policies and procedures.

### **Record keeping**

LRWA maintains appropriate financial records and has appropriate internal controls in place which evidence the business reason for gifts, hospitality and payments made and received.

### **Responsibilities and raising concerns**

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working with LRWA or under our control. All Direct Contacts are required to avoid any activity that might lead to, or suggest, a breach of this policy.

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All Direct Contacts are required to notify LRWA as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, or if they are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

Any concerns relating to a breach of the Policy should be reported to CEO.

### Further information and guidance

This policy sets out the key principles which LRWA must adhere to. The Bribery Act 2010 can be viewed at:

<http://www.legislation.gov.uk/ukpga/2010/23/contents?view=plain>