

	RGF Staffing APEJ Anti-Bribery & Corruption Policy March 2022	Legal 7 Pages
Target audience:	<ul style="list-style-type: none"> All Staff 	
Contact person:	Chris Riorden, Legal	
Policy owner:	Mark Graham, Chief People Officer	
Related Standards:		Related Guidance documents:
<ul style="list-style-type: none"> Nil 		<ul style="list-style-type: none"> Delegation of Authority Policy Code of Conduct & Values Whistleblower Policy Discipline & Misconduct Policy Conflict of Interest Policy Travel & Expenses Policy Procurement and Purchasing Procedure Sponsorship & Donation Guidelines
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1 March 2022	01 March 2022	Updated Template
Approved by:		Approved on:
Chris Riorden		01 March 2022
Group Policy compliance Primary responsibility for adherence to this Policy resides with the SBU Unit CEO. Local laws and regulations supersede this policy. Should this policy be found to be in contradiction with such regulations, it is the CEO's responsibility to immediately inform the General Counsel of this matter. This policy supersedes all local company policies. Should a local policy contradict this policy, it is the CEO's responsibility to align the local policy with this policy.		

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I. PURPOSE OF THE POLICY

This Policy sets out prohibitions and mandatory requirements to ensure that corruption, bribery, and similar practices do not occur in RGF Staffing APEJ's business. RGF Staffing APEJ prohibits any activity that seeks to bribe or improperly influence a Public Official to act in a way that differs from that official's proper duties, obligations, or standard of behaviour.

II. SCOPE OF THE POLICY

This policy applies to all directors, officers, and employees of RGF Staffing APEJ and all subsidiaries, contractors, consultants, or agents. This Policy supplements any other RGF Staffing APEJ policies.

Any queries regarding how this Policy applies to a particular event should be directed to your manager or General Counsel or the Risk and Compliance Manager.

III. COMPULSORY ITEMS

Acceptance of Gifts and Hospitality.

Other employment and business interests.

IV. GOLDEN RULES

If you are unsure how this policy applies, ask your Manager, General Counsel, the Chief People Office or the Risk and Compliance Manager.

V. GLOSSARY

Official term	Explanation
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1. Definitions

For the purpose of this Policy:

Bribe(s) or Bribery includes providing, promising, or offering to pay, any benefit (monetary or otherwise) to a Public Official or someone in business, either directly or indirectly (for example through a third party intermediary), in order to obtain or retain or secure a commercial advantage for RGF Staffing APEJ or to induce or reward the recipient, or any other person, for acting improperly.

Business Partner includes any person or entity which acts for or on behalf of RGF Staffing APEJ, including agents, distributors, advisers, joint venture partners, consultants, contractors or sub-contractors, introducers, finders, and political lobbyists.

Employees include all directors, officers, and employees (internal and temporary) of RGF Staffing APEJ.

Facilitation Payments means unofficial payments (usually of a small value) made with the purpose of expediting or facilitating the performance by a Public Official of a routine government action. They are a form of bribery and are prohibited.

Item(s) of Value includes cash, travel, gifts, meals, scholarships, entertainment, hospitality, or other types of benefits;

Public Official includes:

- Any person employed by or acting on behalf of or in the service of any Government Agency or a public international organisation (such as the United Nations, World Bank, or International Monetary Fund);
- An official or employee of a government or government owned enterprise or regulatory body;
- Any political party or political party official or candidate for office;
- Any person performing a public function;
- Any person holding a public office, including a legislative or administrative or judicial office;
- An individual who holds or performs the duties of an appointment, official or position created by custom or convention, including some members of royal families and some tribal leaders;
- Any person who is, or holds themselves out to be, an authorised intermediary of a Public Official; or
- A relative of an associate of such a Public Official.

2. Summary of Prohibited Conduct

RGF Staffing APEJ strictly prohibits its employees from engaging in bribery or any form of corruption. This means RGF Staffing APEJ Employees must not:

- Offer, promise, give, solicit or accept any Bribe or Facilitation Payment;

- Engage or deal with Business Partners, including joint venture partners, in a manner contrary to this Policy;
- Offer or provide Items of Value to Government Officials which is likely to secure a commercial or business advantage to RGF Staffing APEJ;
- Make any contributions to political parties, campaigns, or candidates on behalf of RGF Staffing APEJ;
- Make any Charitable Donations which are, or could be perceived to be a Bribe;
- Falsify any book, record or account relating to RGF Staffing APEJ's business;
- Cause, authorise, condone, or ignore any conduct which is believed or suspected to be contrary to this Policy or any anti-corruption laws, or aid or abet such conduct. All such conduct, or suspected conduct, must be reported

If you have any doubt about whether particular conduct may breach this Policy, or have any questions regarding its application, please contact your manager or any one of the following:

- General Counsel
- Chief People Officer
- Risk and Compliance Manager

3. Bribery and Facilitation Payments

RGF Staffing APEJ prohibits Bribery or the making of Facilitation Payments.

In particular, RGF Staffing APEJ and its Employees must not promise, offer, provide (or cause to be provided) any Bribe or Facilitation Payment whether directly or indirectly, with the intention of securing business or a business advantage for RGF Staffing APEJ. This applies when dealing with private enterprises and individuals, as well as Public Officials.

No Employee will be penalised, or be subject to other adverse consequences, for refusing to pay Bribes or Facilitation Payments, even if it may result in RGF Staffing APEJ losing business.

An Employee will not be regarded as having breached this Policy if a payment or benefit is provided to a Public Official or another party as a result of fear of imminent risk to personal safety. In such circumstances, the Employee must immediately notify his/her manager and Risk and Compliance Manager as soon as practicable.

4. Engagement and dealings with Business Partners

RGF Staffing APEJ is committed to promoting ethical practices by all its Business Partners and has zero tolerance of any corrupt or inappropriate conduct by Business Partners acting for or on behalf of RGF Staffing APEJ.

All Employees must follow all relevant due diligence checks, in relation to engaging Business Partners including referral to the Credit Team for financial report checks.

5. Gifts, Entertainment, and other Benefits

Gifts, entertainment, and other Benefits can be the basis for bribery or be viewed as being made in order to obtain an improper commercial advantage or to influence a relationship.

In all cases, Employees must consider the Conflicts of Interest Policy, the Delegated Authority Policy and follow the relevant Divisional SOP and the Travel & Expenses Policy in relation to the provision or receipt of gifts, entertainment, or travel.

If you have any doubt about whether the provision or receipt of gifts, offer of hospitality entertainment travel or other Benefit may breach this Policy, please contact the Risk and Compliance Manager for guidance.

6. Donations

Political Donations

RGF Staffing APEJ, its Employees and Business Partners must not grant financial or any other support or assistance to political parties, political campaigns, individual politicians, government departments or administrative bodies on behalf of RGF Staffing APEJ.

Employees and Business Partners who make political donations in their personal capacity must make it clear that it is not on behalf of RGF Staffing APEJ.

Charitable Donations

RGF Staffing APEJ encourages its Employees to support local community initiatives by making donations or performing volunteer work. Charitable Donations must not be made, offered, or promised by any RGF Staffing APEJ Employee on RGF Staffing APEJ's behalf without first obtaining approval from the appropriate Business Unit Leader pursuant to the CMG Delegation of Authority Policy. Employees may make Charitable Donations in their personal capacity.

7. Books and Records

Accurate records of all RGF Staffing APEJ transactions must be maintained. The falsification or mis-description of any record or account of RGF Staffing APEJ is prohibited.

All receipts and expenditures must be supported by source documents that describe them accurately.

Employees are prohibited from making any payments personally in an attempt to evade the requirements of this Policy.

8. Reporting Obligations

Any Employee or Business Partner, who becomes aware of any actual or suspected breach of this Policy, must report this to their manager or follow the process set out in RGF Staffing APEJ's Whistleblower Policy.

In the event that an Employee or Business Partner is uncertain of whether a breach of this Policy has occurred, they may also contact the RGF Staffing APEJ Compliance Hotline to make an enquiry:

+61 2 9269 8600

All persons should remain alert to any instances which may amount to bribery or any other improper conduct not meeting the standard of behaviour required under this Policy.

9. Disciplinary Action

A breach of this Policy will be regarded as serious misconduct and may lead to disciplinary action, up to and including legal action or termination of employment.

Conduct in breach of this Policy may also breach applicable anti-corruption laws and result in criminal or civil penalties, including fines and imprisonment.

RGF Staffing APEJ requires full and open co-operation with any investigation undertaken by RGF Staffing APEJ into alleged or suspected corrupt activity or breach of this Policy (see the Discipline & Misconduct Policy). Failure to cooperate or to provide truthful information will be regarded as serious misconduct and may lead to disciplinary action, up to and including termination of employment.

10. Training and Monitoring

General Counsel is responsible for the overall administration of this Policy. Training will be in-line with the Company Compliance training calendar.