

## RVT Group Ltd - Anti Bribery Policy

### Introduction

The RVT Group values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will reflect adversely on the image and reputation. It aims therefore to limit its exposure to bribery by

- Setting out a clear anti-bribery policy.
- Establishing and implementing anti-bribery procedures to employees and others who will perform services for the partners.
- Undertaking appropriate due diligence measures before engaging others to represent the partners in their business dealings.
- Monitoring and reviewing the risks and effectiveness of any anti-bribery procedures that are in place.

### Policy

The directors prohibit the offering, giving, solicitation or 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 or other person or body acting on behalf of the partners.
- In order to gain any commercial, contractual or regulatory advantage for the partners in a way that is unethical.
- In order to gain any personal advantages (pecuniary or otherwise) for the individual or anyone connected with the individual.

This policy prohibits any inducement that results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action that may not be solely in the interest of the partners or of the person or body employing them or whom they represent.

This policy is not meant to prohibit normal and appropriate hospitality or the giving of a gift on a festival or at another special time, providing they are customary in a particular market, are proportionate and are properly recorded.

Inevitable, decisions to as what is acceptable may not always be easy. If you are in any doubt as to whether a potential act constitutes bribery, the matter should be referred to a partner.

#### Employee's Responsibilities

The prevention, detection and reporting of bribery is the responsibility of all employees and the partners are committed to

- Encouraging employees to be vigilant and to report any suspicions of bribery.
- Providing employees with suitable channels of communication and ensuring that sensitive information is treated appropriately.
- Investigating incidents of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution.
- Taking disciplinary action against any individual involved in bribery.

Any suspicion of bribery should be reported in confidence to a senior partner who has overall responsibility for bribery prevention.

Signed –



Position – Phil Dupont (Director)

01/01/2019