
DRSC ANTI BRIBERY AND CORRUPTION POLICY

Adopted 24-2-2022

1. POLICY STATEMENT

- 1.1 We take a zero tolerance approach to bribery and corruption and will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. We welcome the international community's efforts to stamp out bribery and corruption and support the implementation of the United Nations Anti-Corruption Convention. We encourage our partners and associates to apply all applicable anti-bribery and anti-corruption laws.
- 1.2 The purpose of this policy is to:
- 1.2.1 set out our responsibilities in observing and upholding our policy on bribery and corruption; and
- 1.2.2 provide information and guidance to our partners and associates on how to recognise and deal with bribery and corruption issues.

2. WHO IS COVERED BY THE POLICY?

- 2.1 This policy applies directly to our **Governing Board** and to all individuals acting for or on behalf of **DRSC**, including volunteers. The policy is provided to our partners and associates, who will be required to take reasonable steps to ensure that in carrying out activities economically or non-economically supported by **DRSC** they and their employees, directors and associates comply with all applicable anti-bribery and anti-corruption laws.
- 2.2 In this policy, "third party" means any individual or organisation you come into contact with during the course of your role.

3. WHAT IS BRIBERY AND CORRUPTION?

- 3.1 A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage by the receiver.
- 3.2 Corruption is the misuse of public office or power for private gain or the misuse of private power in relation to business in and outside the realm of government.
- 3.3 Acts of bribery or corruption are intended to influence an individual in the performance of their work to act dishonestly and/or improperly. The person being bribed is usually someone who can obtain, retain or direct business for example during a tender or contracting process or it may be through the handling of administrative tasks or customs matters.
- A bribe can take many forms, for example, a direct or indirect promise or offer of something of value, the offer or receipt of a kickback, fee, reward or other advantage, the giving of aid, donations or voting designed to exert improper influence.

3.4 Those engaged in bribery and corruption can include any person or organization acting for or on behalf of **DRSC**, engaging in these acts either directly or by authorizing someone else to carry out these acts.

4. GIFTS AND HOSPITALITY

4.1 This policy does not prohibit gifts, entertainment, hospitality or other promotional expenditures (given and received) to or from third parties which are proportionate, transparent, reasonable and for bona fide purposes related to the aims and objectives of **DRSC**.

4.2 The giving or receipt of gifts is not prohibited if all of the following requirements are met:

4.2.1 it is not made with the intention of influencing a third party 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;

4.2.2 it is not to alter the behavior of the receiver, to the benefit/interest of the giver

4.2.3 it complies with local law;

4.2.4 it is given in **DRSC's** name, not in your name;

4.2.5 it does not include cash or a cash equivalent (such as gift certificates or vouchers);

4.2.6 it is appropriate in the circumstances. For example, it is given as a ceremonial gift on a festival or at another special time (e.g. Christmas, Eid al-Fitr or Shabbat);

4.2.7 taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;

4.2.8 it is given openly, not secretly; and

4.2.9 gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of the entire **Governing Board**.

4.3 We appreciate 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. The intention behind the gift should always be considered.

4.3.1 Gifts to a value of more than **\$100 USD** (or of comparable value in a different country)¹ should not be given or offered (to or from a single source on a single occasion) unless they have the written approval of a **member of the Governing Board**.

4.4 All gifts and hospitality to a value of more than **\$100 USD** (or of comparable value in a different country) accepted or offered by any person acting for or on behalf of **DRSC** should be entered in the register of gifts.

¹ In deciding whether a gift is of comparable value, the relevant employee or Board Member should consider all surrounding circumstances including, but not limited to, the average income in the location where the recipient of the gift is based.

5. WHAT IS NOT ACCEPTABLE?

5.1 It is not acceptable for you (or someone on your behalf) to:

- 5.1.1 give, promise to give, or offer, a payment, gift or hospitality to any person acting for or on behalf of **DRSC** with the expectation or hope or that this will influence the decision-making of **DRSC** or that a business advantage will be received, or to reward a business advantage already given; or
- 5.1.2 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; or
- 5.1.3 accept payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that **DRSC** decision making will be influenced in any way and that it will obtain a business advantage for them; or
- 5.1.4 threaten or retaliate against another person who has refused to commit a bribery offence or who has raised concerns under this policy; or
- 5.1.5 engage in any activity that might lead to a breach of this policy.

6. FACILITATION PAYMENTS

- 6.1 We do not make, and will not accept being made on our behalf, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official (e.g. processing a visa, customs invoice or other governmental paper).
 - 6.1.1 If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with **a member of the Governing Board**.
- 6.2 If such a payment is extorted or forced under duress or because of a threat to personal safety then the payment may be made provided that **a member of the Governing Board** is promptly informed, a written report submitted, and the payment recorded in **DRSC** financial records.
- 6.3 Kickbacks are typically payments made in return for a business favour or advantage. All our partners and associates must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

7. YOUR RESPONSIBILITIES

- 7.1 You must ensure that you read, understand and comply with this policy.

- 7.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those acting for or on behalf of **DRSC**, including volunteers. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 7.2.1 You must notify **a member of the Governing Board** as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a partner, associate or potential partner or associate offers you something to gain an advantage with us, or indicates to you that a gift or payment is required to secure their co-operation with **DRSC** supported activities.
- 7.3 Any person acting for or on behalf of DRSC who breaches this policy will face disciplinary action, which could result in the immediate termination of our association with that person for gross misconduct. We reserve our right to terminate our contractual relationship with our partners and associates if they breach this policy.

8. RECORD-KEEPING

- 8.1 We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- 8.2 You must declare and keep a written record of all hospitality or gifts to a value of more than **\$100 USD** (or of comparable value in a different country) accepted or offered on the gifts register, which will be subject to review by the **Governing Board**.
- 8.3 You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.
- 8.4 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

9. HOW TO RAISE A CONCERN

- 9.1.1 You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other concerns, these should be raised with **a member of the Governing Board**.

10. PROTECTION

- 10.1 Persons who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 10.2 We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action,

threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform **a member of the Governing Board** immediately.

11. COMMUNICATION

11.1 Our zero-tolerance approach to bribery and corruption will be communicated on our website and be accessible to all partners associates, suppliers, and contractors at the outset of our relationship with them and as appropriate thereafter.

12. WHO IS RESPONSIBLE FOR THE POLICY?

12.1 The **Governing Board** has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

12.2 The secretary of the **Governing Board** has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

13. RISK ASSESSMENT, MONITORING, AND REVIEW

13.1 As part of its annual risk assessment process the **Governing Board** will monitor the effectiveness and review the implementation of this policy, considering its suitability, adequacy and effectiveness.

13.2 The **Governing Board** and any person acting for or on behalf of **DRSC** are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

13.3 This policy is part of the contract of any person acting for or on behalf of **DRSC** and may be amended at any time.