

Rothsay

# Anti-Bribery and Corruption

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# I. Introduction

Rothestay is firmly committed to complying with all applicable anti-bribery and anti-corruption law including but not limited to the Bribery Act 2010. Almost every country has anti-bribery laws or is a party to international anti-bribery conventions. Collectively, these laws and conventions prohibit the Group, its personnel, and others acting on the Group's behalf from offering, making or receiving payments or providing or receiving goods or services for the purpose of gaining an improper competitive advantage or inducing or rewarding the improper performance of a relevant function or activity. This Policy is applicable to all employees of the Group. It also applies to secondees, contractors and agency personnel whilst in the employment of the Group.

Rothestay will not tolerate bribery of or by its personnel, its agents or the third parties with which it deals.

Rothestay is committed to seeking and retaining business on the basis of merit, not through bribery or corruption. It is the Group's policy that:

- Personnel are prohibited from providing anything of value to obtain or retain business or favoured treatment from: public officials; candidates for office; employees of state-owned enterprises; employees or officers of counterparties, customers, or suppliers; any agent of the aforementioned parties; or to any other person with whom the Group does or anticipates doing business;
- The prohibition against providing "anything of value" to obtain or retain business or favoured treatment includes obvious improper payments, such as cash bribes or kickbacks, but also may include other direct or indirect benefits and advantages, such as inappropriate gifts, meals, entertainment, charitable contributions, and offers of employment or internships;
- Rothestay will avoid activities that raise even the appearance of impropriety;
- The prohibition extends not only to public officials and other restricted recipients<sup>1</sup>, but also to corporate clients and other private parties;
- Rothestay prohibits its personnel and others acting on its behalf from requesting or accepting bribes and other improper financial advantages, as well as offering them;
- Rothestay has policies that address Gifts and Entertainment, Charitable Contributions, Financial Crime (including AML/KYC) and also policies and procedures for transaction approvals.

In addition, Rothestay has a whistleblowing policy which sets out the framework by which employees may disclose information where they have a reasonable belief about any suspected illegal or unethical behaviour within the Group, with explicit provision of protection from retaliation.

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<sup>1</sup> Restricted recipients include government officials, political figures, employees of regulators and rating agencies, employees of state-owned enterprises.

## II. Dealing with Third Parties

Due to the nature of the Group's relationship with them, certain third parties can potentially present a higher bribery and corruption risk than others. These would include introducers, brokers and intermediaries who by the very nature of their business are competing to win new business. Due to the extra risk posed, the Group has an explicit Engaging Finders and Intermediaries Policy which defines the steps and approvals that must be followed when on boarding a new intermediary.

### III. Training and reporting

Employees are routinely trained on financial crime obligations, including obligations to report suspicions as soon as is practicable. Training and awareness can take various forms including an annual computer-based training module, some face-to-face training and also regular attestations on adherence to the compliance standards in the Compliance Manual.