



# GIFTS AND HOSPITALITY POLICY – RA INTERNATIONAL (RA)

## 1. Introduction

It is often customary and appropriate to make gifts or to provide hospitality, in the course of business. Employees may likewise be offered gifts, hospitality, or other benefits by suppliers or other business contacts. RA's policy is to behave ethically at all times in the conduct of its business. RA will not tolerate bribery, either solicited, offered, received, or given. We want to encourage all business partners to observe the same high standards.

Bribery is a criminal offence, and as such, RA does not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor does RA accept bribes or improper inducements. A breach of this rule will result in disciplinary action up to and inclusive of dismissal and/or referred to the relevant authorities. In addition, employees must report any wrong-doing, or suspicions of wrong-doing either directly to their line manager or through submitting a report to the RA whistleblowing web page (Ethics point) via [raints.ethicspoint.com](https://raints.ethicspoint.com).

As RA operates in different jurisdictions, some RA guests, such as Government officials, may be subject to specific rules which limit or, in some cases, prevent them from accepting gifts and hospitality. Therefore RA employees, RA subcontractors, and suppliers must be vigilant when working in different jurisdictions and must be aware of the local applicable rules and regulations before getting engaged in any act of offering gifts and hospitality.

## 2. Giving Gifts

Where the intended recipient is allowed to accept it, employees may offer a gift that has no commercial value. Under exceptional circumstances, and at the discretion of the CEO that any gift that does have a commercial value be given, and that any such authority has a genuine business reason. Money, or cash equivalent, may *never* be given. The offeror must submit the "Record of Gifts & Hospitality" form as per Appendix A of RA Gifts and Hospitality Policy to the Compliance Manager within 42 hours and after obtaining the approval/signature of the Line Manager and Country Manager.

## 3. Receiving Gifts

Employees may accept gifts that bear limited commercial value and reasonable in nature. Money or cash equivalent must *never* be accepted under any



circumstances. The acceptance of gifts and the reasons for it must be registered in the “Record of Gifts & Hospitality” form as per Appendix A of RA Gifts and Hospitality Policy and signed by the Line Manager or Country Manager; then submitted within 42 hours to the Compliance Manager.

#### 4. Hospitality

Hospitality may be offered or received if it is reasonable and proportionate in all circumstances and to do so is not deemed to be inappropriate, lavish, or extravagant.

#### 5. Personal Benefits

Employees must not use any position or role in the company to obtain an undisclosed benefit or advantage.

#### 6. Keeping Registers

For each gift and hospitality offered and received, in accordance with the policy, the “Record of Gifts & Hospitality” form must be submitted within 42 hours to the Compliance Manager after being signed by the Line Manager or the Country Manager.

#### 7. Full Gifts & Hospitality Policy

This policy should be read in conjunction with the fuller and extended version of the policy document. Employees can be subject to disciplinary action through a breach of the policy and it will not be an acceptable excuse that employees have not read and understood the full document. Therefore, in terms of corporate gifts and hospitality, employees should be mindful of how any gifts or hospitality, given or received, can be *perceived* as a bribe under local or International anti-bribery legislations. Employees should also take the time to make themselves aware of the topics covered in the full policy version, including the following areas:

- a. Responsibilities of RA employees and managers;
- b. What is permitted and what is unacceptable gifts and hospitality;
- c. How to deal with Government officials in this context;
- d. Recording of gifts and hospitality as per the form in *Appendix ‘A’*.

If any employee witnesses an act in breach or in violation of this policy, or has suspicions of any impropriety, then they must report the matter to either their Line Manager, Country Manager, the Compliance Manager, any Senior Manager in Dubai



H.O. or submit a report on EthicsPoint ([raints.ethicspoint.com](https://raints.ethicspoint.com)).

Employees could be subject to disciplinary action by not complying with this policy. Additionally, by not reporting any violations or suspicions, employees raise the levels of risk of prosecution and/or fines under the UK Bribery Act, not only to the company but to themselves.

Policy Implementation/Review Date	Next Policy Review Date
25 August 2020	25 August 2022



## Appendix A- Record of Gifts & Hospitality

RECORD OF GIFTS/HOSPITALITY RECEIVED & PROVIDED			
<i>Use this form to record details of actual or proposed gifts or hospitality, received from or provided to third parties.</i>			
Name of person completing form:		Date:	
1. Details of Gift/hospitality: (Tick relevant boxes)	Gift <input type="checkbox"/>	Hospitality <input type="checkbox"/>	Given <input type="checkbox"/> Received <input type="checkbox"/> Refused <input type="checkbox"/>
<i>(Use this section to specify details of the gift/hospitality received/given)</i>			
(a) Brief description of item:			
(b) Reason for gift/hospitality:			
(c) Date provided/received:		(d) Value (closest estimate if unknown):	
(e) Location where provided/received:			
(f) Action on gifts received:			
<b>2. PROVIDER DETAILS:</b> <i>(Use this section to specify details of the person who is providing or planning to provide the gift or hospitality - if applicable)</i>			
(a) Name of person/body:			
(b) Contact Name:			
(c) Contact email/phone number:			
(d) Relationship (supplier etc.):			
<b>3. RECIPIENT DETAILS:</b> <i>(Use this section to specify details of person(s) or body receiving the gift or hospitality - if applicable)</i>			
(a) Name of person(s)/body:			
(b) Contact Name:			
(c) Contact email/phone number:			
(d) Relationship (supplier etc.):			
<b>4. AUTHORISATION</b>			
(a) Name of Authorising Manager			
(b) Date:			
(c) Signature:			