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## Anti-Corruption and Bribery Policy

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## 1. Introduction

It is the policy of Reigate Grammar School Riyadh (RGSR) to conduct all of its business in an honest and ethical manner. RGSR takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships and implementing and enforcing effective systems to counter bribery.

The purpose of this policy is to:

- Set out the responsibilities for observing and upholding the school's position regarding bribery and corruption; and
- Provide information and guidance on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are criminal acts for individuals. If the school is found to have taken part in corruption, it could face charges and damage to its reputation. Therefore, the legal responsibilities are taken very seriously.

In this policy, the term 'third party' means any individual or organisation with whom a worker comes into contact and includes actual and prospective students and parents, suppliers, business contacts, agents, advisers, and government and public bodies.

## 2. Who is covered by the policy?

This policy applies to all individuals working for RGSR at all levels (whether permanent, fixed-term or temporary), and includes the Heads of Schools, staff members, volunteers, agents or any other person associated with the school (collectively referred to as 'workers' in this policy).

## 3. What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any business or personal advantage.

## 4. Gifts and Hospitality

The giving or receipt of gifts or hospitality is not prohibited, so long as:

- There is no 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;
- It complies with local law;
- The gift is appropriate in the circumstances;
- The gift is given openly, not secretly.

In some contexts, the receipt of gifts could be construed as an improper inducement to, for instance, accord preferential treatment in the future. Consequently, it is necessary for RGSR to have guidelines applying to such gifts. These are as follows:

Any gifts or hospitality with a value of 2,000 SAR or over must be reported to the Head of School (including where it is a combined gift from more than one individual). The gift will be entered onto the RGSR Gift Register which is reviewed by the Chief Operating Officer.

There may be circumstances where it is not appropriate for a gift to be kept. If this is the case, the Head of School will discuss this with the employee. If an employee has any doubt about whether or not a gift should be kept, irrespective of its value, the employee must discuss this with the Head of School.

It is not acceptable for an employee (or someone on the employee's behalf) to:

- Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that an advantage for the school will be received, or to reward an advantage already received;
- 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;
- Accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain an advantage for them;
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by the school in return;

- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- Engage in any activity that might lead to a breach of this policy.

## 5. Donations

RGSR only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made in the school's name or on behalf of the school without the prior approval of the Head of School.

## 6. Employee Responsibilities

The following are the responsibilities of each employee:

- Employees must ensure that they read, understand and comply with this policy.
- The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for RGSR or under the school's control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- Employees must notify the Head of School as soon as possible if he/she believes or suspects that a breach of this policy has occurred or may occur in the future.
- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. RGSR reserves the right to terminate their contractual relationship with other workers if they breach this policy.

## 7. Record-keeping

RGSR keeps financial records and has appropriate internal controls in place which will evidence the business reason for making payments to third parties.

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.

## 8. How to raise a concern

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Concerns should be reported by following the procedure set out in the Whistleblowing Policy.

## 9. Protection

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. RGSR aims 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.

RGSR is 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 an employee believes that they have suffered any such treatment, they should refer to the RGSR Staff Grievances Procedure.