

The logo for RHA, consisting of the letters 'RHA' in a bold, italicized, sans-serif font with a metallic, brushed metal texture.

# Anti Bribery and Corruption Policy

The background features a central shield with a padlock, held by two hands. Surrounding these elements are various digital icons such as bar charts, pie charts, gears, and server racks, all in a light blue color against a dark blue background.

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# Introduction



This policy sets out the Road Haulage Association's (RHA) zero-tolerance approach to bribery and corruption in all forms.

Bribery including the offering, requesting, or accepting of gifts, money, hospitality, or favours in exchange for influence or advantage is a criminal offence and strictly prohibited.

All employees, contractors, and temporary staff must act with integrity, avoid any actions that could be construed as bribery or corruption, and report any suspected breaches immediately to their Line Manager or the Anti Bribery and Corruption (ABC) Officer.

Failure to comply with this policy may result in disciplinary action, including termination and referral to relevant authorities.

This policy applies consistently to all individuals acting on behalf of the RHA and supports compliance with legal requirements and internal ethical standards.

The RHA reserves the right to amend this policy at any time and to take appropriate action in response to any breach or non-compliance.

# Definitions

## Bribery

The offering, giving, receiving, or soliciting of anything of value, such as money, gifts, hospitality, or favours, with the intent to influence a decision or secure an improper advantage.

## Facilitation Payments

Small payments made to public officials or other individuals to expedite or secure routine governmental actions or services, which are often considered illegal or unethical.

## Kickbacks

Payments or benefits made in return for facilitating or rewarding preferential treatment, typically in connection with a business transaction.

## Third Parties

Any individuals or organisations that act on behalf of or interact with the association, including suppliers, agents, consultants, contractors, and business partners.

## Public Officials

Individuals holding a legislative, administrative, or judicial position of any kind, whether appointed or elected, in a government department or public international organisation.

## Gifts

Items of value provided to or received from external parties as a gesture of goodwill, not associated with internal workplace gifts.

For purposes of this policy, items of nominal value that display company branding, including but not limited to bags, hats, pens, and similar promotional merchandise, shall not be considered gifts. Alcoholic beverages, irrespective of branding or value, shall be considered gifts.

## Hospitality

Entertainment, meals, travel, accommodation, or other business courtesies provided or received in connection with a business relationship.



# Responsibilities



All employees are expected to:

- Act with honesty, integrity, and transparency in all business dealings;
- Avoid offering, giving, soliciting, or accepting bribes or any improper benefits;
- Report any suspicious activity or potential breaches of the ABC policy promptly to their Line Manager and the ABC Officer;
- Comply fully with this policy and attend any required training on anti-bribery and corruption; and
- Accurately record and declare all gifts, hospitality, and high-risk interactions with officials (including but not limited to government representatives, regulators, and public sector bodies) in the appropriate registers.

The Anti Bribery and Corruption (ABC) Officer is expected to:

- Oversee the implementation and enforcement of the Anti Bribery and Corruption policy across the Company;
- Provide guidance and support to employees and Line Managers regarding anti-bribery compliance;
- Maintain and regularly review the Gifts and Hospitality and Officials Registers to ensure transparency and compliance;
- Investigate reports of suspected bribery or corruption promptly and confidentially;
- Ensure regular training and communication to maintain awareness and understanding of the policy; and
- Monitor compliance and recommend updates to the policy as needed.

The RHA ABC Officer is: **Jade Barsby**

Contact Number: **07934 295942**

Email: **abc@rha.uk.net**

# Prohibited Conduct



The RHA strictly prohibits any form of bribery, corruption, or unethical conduct. The following activities are expressly forbidden under this policy and may result in disciplinary action, including termination of employment or contract, and referral to legal authorities where appropriate:

## Offering or Giving Bribes

Offering, promising, or giving anything of value such as money, gifts, hospitality, services, or favours with the intention of influencing a person's actions or decisions in order to obtain or retain business or gain an improper advantage.

## Requesting or Receiving Bribes

Soliciting, agreeing to receive, or accepting anything of value with the expectation that a person will be influenced to act improperly or provide a business or personal benefit in return.

## Facilitation Payments

Making unofficial payments to public officials or others to speed up or secure action, such as issuing permits, processing paperwork, or releasing goods.

## Kick Backs

Receiving or providing payments or other benefits in return for awarding or securing a contract, favourable treatment, or improper advantage in a business decision.

## Improper Gifts and Hospitality

Giving or accepting gifts, meals, entertainment, or hospitality that could influence, or appear to influence, a business decision.

Gifts and hospitality may only be accepted or offered if they are:

- Modest in value (generally not exceeding £50 per individual);
- Clearly for legitimate business purposes, such as networking or relationship-building;
- Not given during contract negotiations, tenders, or similar sensitive periods; and
- Recorded in the Gifts and Hospitality Register for transparency.

Anything that exceeds this threshold or could be perceived as excessive or improper must be referred to the relevant Line Manager and the ABC Officer before proceeding.

# Prohibited Conduct Continued



## Political and Charitable Contributions

Making donations to political parties, candidates, or charitable organisations with the intention of gaining improper business influence or favourable treatment is strictly prohibited.

## Improper Dealings with Public Officials

Offering, giving, or promising anything of value to a public official to influence their actions or secure an advantage is strictly prohibited. Extra caution must be taken in interactions with government representatives, regulators, and public sector bodies.

## Misuse of Position or Information

Abuse of a position within RHA, or the use of confidential information, for personal gain or to benefit a third party in an unethical or unlawful manner is strictly prohibited.

## Failing to Report or Conceal Suspected Bribery

Failing to report known or suspected instances of bribery, or attempting to cover up or ignore unethical conduct, is a serious breach of this policy.

All individuals acting on behalf of RHA are expected to avoid not only actual misconduct but also any appearance of impropriety that may damage the Association's reputation or expose it to legal risk.

If you are ever unsure whether a certain action may constitute prohibited conduct, seek guidance from your Line Manager or the ABC Officer before proceeding.

# Permitted Conduct

The RHA recognises that some interactions involving gifts, hospitality, and third parties are a legitimate part of building professional relationships. However, such conduct must always be transparent, proportionate, and appropriate.

The following activities are generally considered permissible, provided they meet the conditions outlined below:

## Transparent Business Relationships

Engaging in business arrangements or contracts with third parties following appropriate due diligence, ensuring no conflicts of interest exist, and using approved procurement processes that promote fair and open competition.

## Charitable Donations

Charitable donations made on behalf of the RHA where there is no expectation of an advantage in return. All charitable contributions must be transparent, approved by the relevant Line Manager and HR department. If the request is approved, HR will arrange for the donation to be made.

## Modest Gifts and Hospitality

- Low-value items (e.g. small tokens under £50) given or received as a gesture of goodwill.
- Hospitality that is reasonable, infrequent, and clearly for business purposes (e.g. modest meals or events with a legitimate networking function).
- All gifts (as defined in this policy) and hospitality must be declared and recorded in the Gifts and Hospitality Register.

## Engagement with Public Officials and Political Bodies

Engaging in lawful and transparent interactions with public officials is permitted when required for legitimate business purposes.

Recording is not required for low-risk activities such as documented correspondence, public conferences, open parliamentary receptions, public consultations, standard policy submissions, general lobbying without any exchange of benefit, or large group forums with no private engagement.

# Gifts and Hospitality



The giving or receiving of gifts (as defined in this policy) and hospitality is only permitted under specific, limited circumstances that do not create a real or perceived conflict of interest or appear to improperly influence business decisions.

All such exchanges must comply with the following principles:

1. Gifts and hospitality may be accepted or offered only when:

- They are modest, infrequent, and proportionate to the business relationship.
- They serve a legitimate business purpose (e.g. relationship building or cultural courtesy).
- They are not given during, or in anticipation of, contract negotiations, tender processes, or regulatory approvals.
- There is no expectation of a return favour or business advantage in exchange.

2. Approval thresholds are met:

- Gifts or hospitality valued at £50 or less may be accepted or offered without prior approval but must still be recorded in the Gifts and Hospitality Register.

- Any gift or hospitality exceeding £50 in value requires pre-approval from the relevant Line Manager and the ABC Officer.
- Gifts or hospitality offered to, or received from, public officials must always be approved in advance, regardless of value.

3. Documentation requirements are met:

- All external gifts and hospitality (offered or received) must be recorded in the Gifts and Hospitality Register promptly and in full.
- Records must include the date, nature, estimated value, parties involved, and the reason for the exchange.
- Failure to declare gifts or hospitality may constitute a breach of this policy and result in disciplinary action.

All staff are expected to exercise sound judgment and, if in doubt about the appropriateness of a gift or hospitality, to seek guidance before accepting or offering it.

In certain circumstances it may be appropriate to accept a gift on behalf of the RHA but not benefit from it personally, in these cases the gift should be donated to the RHA Benevolent Fund.

# Dealings with Public Officials

Engagements with public officials present an inherently higher risk of bribery and corruption due to the potential for undue influence, preferential access, or the perception of impropriety.

The RHA applies enhanced controls to higher-risk interactions, while allowing routine, transparent advocacy to proceed in the normal course of business.

The following rules and controls must be strictly observed:

## 1. Additional Controls and Approvals

Enhanced approvals and due diligence are required where an engagement involves elevated bribery and corruption risk, including but not limited to:

- the provision of any gifts, hospitality, travel, accommodation, or other benefits;
- any form of financial or in-kind support to public bodies or officials;
- requests or offers of preferential access, assistance, or introductions; and

- one-to-one or closed meetings with decision-makers where specific regulatory, funding, licensing, enforcement, or other outcome-seeking matters are discussed.

In such cases, the interaction must be approved in advance by the relevant Line Manager or Senior Leader, and appropriate due diligence must be completed to confirm the official's role, the purpose of the engagement, and its compliance with legal and ethical requirements.

Where applicable, contracts or agreements involving public officials must include appropriate anti-bribery and corruption clauses.

# Public Officials continued

## 2. Transparency and Accurate Record Keeping

High-risk engagements with public officials, as outlined in section 1, must be fully and accurately documented, including:

- the purpose of the interaction;
- the officials and RHA representatives involved;
- the location and format of the engagement;
- any benefit offered, provided, or received; and
- the relevant approvals obtained.

Prompt and truthful disclosure is mandatory to enable ongoing monitoring and compliance verification.

## 3. Limits on Entertainment and Contributions

Any hospitality or entertainment extended to public officials must be reasonable, proportionate, and directly related to legitimate business activities. Lavish, excessive, or frequent hospitality is prohibited.

Cash or cash equivalents must never be offered.

Political contributions, charitable donations, sponsorships, or other financial or in-kind support connected to public officials or public bodies must receive prior approval from the ABC Officer, Finance Director, and Managing Director.

Gifts to public officials are generally prohibited unless explicitly permitted by law and approved in advance in accordance with this policy.

Strict adherence to these controls is essential to protect the RHA's reputation, comply with legal requirements, and mitigate risks associated with bribery and corruption. Any uncertainty or questions should be directed immediately to the ABC Officer.

## Third-Party Due Diligence

All contractors, consultants, agents, suppliers, and other third-party partners engaged by the RHA must undergo appropriate due diligence screening before any business relationship is established.

This process is designed to assess the third party's reputation, integrity, compliance with anti-bribery laws, and alignment with the organisation's ethical standards.

Contracts with third parties must include clear and enforceable anti-bribery and anti-corruption clauses. These clauses should explicitly prohibit bribery and require the third party to comply with all applicable laws and the RHA's ABC standards.

Ongoing monitoring of third-party relationships is essential. The Company reserves the right to conduct audits, request additional information, and review compliance periodically to ensure adherence to anti-bribery obligations.

Any suspected breaches or concerns identified during monitoring must be reported immediately to the ABC Officer for investigation and appropriate action.

## Record Keeping



All financial and non-financial records must be maintained accurately, completely, and in a timely manner to support transparency, legal compliance, and accountability. This includes maintaining books and records that reflect the true nature of all transactions, without omission, misrepresentation, or falsification.

Documentation must be retained for all gifts, hospitality, expenses, charitable contributions, political donations, and any other benefits or transfers of value. These records should clearly state the purpose, value, recipient, date, and any relevant approvals.

The Gifts and Hospitality Register and the Officials Register, must be kept up to date and available for review.

Records must be stored securely and retained for a reasonable period to allow for internal audits, regulatory review, and any necessary investigations. All records must be accessible to authorised personnel and available for inspection upon request.

Failure to maintain accurate records may be treated as a breach and could lead to disciplinary or legal consequences.

# Reporting and Whistleblowing

All employees are expected to report any concerns or suspicions of bribery, corruption, or other unethical behaviour immediately. This includes suspected breaches of anti-bribery laws, this policy, or any related procedures.

Early reporting is essential to allow timely investigation and appropriate action.

Reports can be made through the relevant Line Manager, Senior Leader or directly to the ABC Officer. All reports will be treated seriously, fairly, and in confidence to the extent possible.

All reported concerns will be investigated promptly and thoroughly. Where necessary, appropriate corrective action will be taken, including internal disciplinary measures or referral to external authorities.

The RHA strictly prohibits retaliation against any employee who raises a concern in good faith, even if it is ultimately found to be unsubstantiated. Any attempt to discourage or penalise someone for reporting suspected misconduct will be treated as a serious disciplinary matter.

Employees, contractors, and third parties are encouraged to speak up without fear. Maintaining an open and transparent reporting culture is essential to protecting the Company's integrity and reputation.

For further information on Whistleblowing, please refer to the company's Whistleblowing Policy available on the Intranet under the Policies and Procedures section or contact the RHA whistleblowing officer:

Email: [c.murphy@rha.uk.net](mailto:c.murphy@rha.uk.net)

If an employee feels unable to raise a concern through internal channels, they may contact Protect, an independent whistleblowing charity that offers confidential advice and support.

Confidential Advice Line: 020 7404 6609 or 020 3117 2550

Email: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)

# Policy Compliance



Employees are responsible for understanding and adhering to all applicable company policies, including those related to anti-bribery, gifts and hospitality, interactions with public officials, procurement, and record-keeping.

Failure to comply with company policies, whether intentional or due to negligence, may result in the following actions:

- Requirement to rectify or correct non-compliant actions or omissions.
- Removal from duties or withdrawal of authority in areas where breaches have occurred.
- Disciplinary action under the RHA's Disciplinary Policy.

Serious or repeated breaches including misconduct such as fraud, bribery, corruption, or deliberate policy evasion may result in disciplinary action up to and including summary dismissal, and the Company reserves the right to pursue legal action where appropriate.

For further information, please refer to the Company's Disciplinary Policy, available on the intranet under the Policies and Procedures section.

# RHA

If you require further information or clarification on this policy,  
please contact your Line Manager or email:



[abc@rha.uk.net](mailto:abc@rha.uk.net)