

**RICHARD GLEN ASSOCIATES**

**BUSINESS INTEGRITY POLICY STATEMENT**

Richard Glen Associates is committed to ensuring its Business Partners and Consultants acknowledge they have received a copy of RGA's Business Principles, the 'Practice Principles.' Business partners must ensure they understand all elements of the Practice Principles and have communicated the contents to their staff, who at all times will comply strictly with the Practice Principles.

The (Business Partner) acknowledges that it has appointed an appropriate senior manager with responsibility for ensuring that the provisions of this Business Integrity Policy Statement are complied with, and (Business Partner) undertakes to take all necessary steps to ensure that such manager will perform their responsibilities diligently for the duration of this agreement.

(Business Partner) acknowledges and undertakes:

1. It has in force and will maintain and enforce a written anti-corruption policy applicable to its business.
2. It will take all necessary steps to ensure the provisions of its anti-corruption policy are complied with by all staff and relevant persons are made aware of and are directed to comply strictly with its anti-corruption policy.
3. It has not offered nor given, nor will it offer nor give, nor will it permit any third party to give, directly or indirectly any bribe, gift, facilitation or grease payment, favour or other improper advantage, in connection with the subject matter of this agreement.
4. It has not demanded nor accepted, nor will it demand nor accept, directly or indirectly, any bribe, gift, facilitation or grease payment, favour or other improper advantage for itself or any third party, in connection with the subject matter of this agreement.

The (Business Partner) acknowledges and undertakes to comply strictly with all applicable laws and with all anti-corruption undertakings and agreements which RGA have entered into with (the Client) or other parties for the purposes of the services to be performed under this agreement.

The (Business Partner) hereby represents and warrants that it is not related in anyway to the client and also that no officer, manager, director or direct or indirect owner of (Business Partner) is related to the client or to the owners or managers of the client or is a government official, political party official or candidate, or an immediate family member of such an official or candidate. In the event that during the term of this Agreement there is a change the (Business Partner) agrees to make immediate disclosure to RGA and in that case RGA may immediately terminate this agreement by written notice.

**BIP 1**

The (Business Partner) will promptly advise RGA of any change in the financial or ownership interests in the (Business Partner). If, in the opinion of RGA, such change creates an actual or apparent conflict of interest, which is relevant to this Agreement, RGA may immediately terminate this Agreement by written notice.

RGA has chosen (Business Partner) on the basis of (Business Partner's) experience and qualifications, including (Business Partner's) reputation for ethical business conduct and compliance with applicable laws. Thus (Business Partner) may not assign its rights or obligations under this Agreement to third parties and Business Partner may not utilise nor employ any third party, individual or entity in connection with (Business Partner's) performance of its obligations under this Agreement without RGA's prior written express approval which will be withheld if (amongst other things) the third party does not have a satisfactory reputation for ethical business conduct and compliance with applicable laws.

If RGA reasonably suspects the (Business Partner) is in breach of any of the provisions of this Business Integrity Policy Statement, RGA will be entitled to terminate this agreement immediately and to claim all amounts unpaid at the date of termination, damages and costs from the (Business Partner). In the event that RGA exercises its rights under this clause, (Business Partner) will immediately cease all work and shall immediately permit RGA to take over the provision of the remaining services to be performed by (Business Partner).



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Richard Glen  
On behalf of Richard Glen Associates



Date .....

**RICHARD GLEN ASSOCIATES  
ANTI-CORRUPTION POLICY STATEMENT**

At Richard Glen Associates we insist on integrity in all aspects of our business – and expect the same from all those with whom we do business. We expect honesty, openness and integrity from those we have business dealings. This means we act in an ethical, honest and professional way, respecting the dignity of the individual and the people we work with.

Bribery of any form is unacceptable. We refuse to offer, give or receive bribes or improper payments which may be construed as a bribe, or participate in any kind of corrupt activity, either directly or through any third party. Any demand for, or offer of, a bribe or inducement to act in any way contrary to our principles will be rejected immediately.

**We always:**

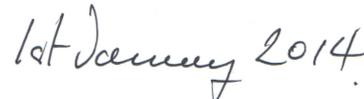
- Report any attempts to bribe us, or to solicit bribes from us, and any suspicions we have about bribery and corruption.
- Endeavour to avoid even the appearance of wrongdoing.

**We never:**

- Participate in any form of corrupt behaviour.
- Conceal or fail to record accurately and completely the true nature of our activities, or falsify or tamper with the Practice’s books and records.
- Pay more than fair market value for goods and services.



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Richard Glen  
On behalf of Richard Glen Associates



Date .....

**RICHARD GLEN ASSOCIATES**  
**DRUGS AND ALCOHOL POLICY**

**Policy**

It is the policy of Richard Glen Associates (RGA) to provide a safe and secure environment for all persons affected by its work activities. The Practice recognises the inherent risks associated with alcohol, drug and solvent abuse and is intent on safeguarding its workplaces and work activities from these risks. The company has adopted a zero-tolerance policy that embraces:

- Being in possession of alcohol, drugs or substances capable of abuse
- Consuming alcohol, drugs or engaging in substance abuse
- Reporting for work having recently consumed alcohol, drugs or solvents
- Reporting for work having taken prescribed drugs which may affect their fitness for work
- Trading of alcohol, drugs and substances of abuse, or permitting their presence or use by others

**Purpose**

To provide a clear understanding of the Practice's minimum compliance requirements for dealing with Alcohol and Drug related problems at work.

**Scope**

This procedure is relevant to all employed by the Practice.

**Responsibility**

- Individuals for ensuring they comply with the Practice requirements
- Subcontractors for ensuring their employee's comply with the Practice requirements
- Manager's for identifying individuals whom they are responsible for, or whom they work with, which may be in breach of this policy

**Procedure**

1. The consumption, or being under the influence, of Alcohol and/or an illegal and/or harmful substance within the workplace, or while carrying out a work activity, is strictly forbidden and constitutes an offence of Gross Misconduct, which will be dealt with under the Company Disciplinary Procedure. Attending a Public House for food is considered reasonable, but the consumption of any alcohol before returning to work is deterred.
2. The Practice reserves the right to subject applicants, all staff to alcohol and/or drug tests, on a random basis or where it is believed that an individual's fitness for work, their conduct or performance at work may be compromised due to the use of alcohol, drugs or other harmful substance (including abuse outside working hours).

Employees involved in an incident or accident (including lost-time injuries, non-lost time injuries and road traffic accidents where it is suspected the employee(s) is at fault) will be subject to alcohol and/or drug testing.

In these circumstances, a request to undergo a test may be made. A refusal to undergo a test may be considered as a positive test result, which constitutes Gross Misconduct.

3. The practice is not looking to discriminate against employees who approach them for help with an alcohol or drug related problem and who are prepared to undergo an agreed form of treatment. However, approaches of this nature will not be considered acceptable when they have been made subsequent, or just prior to, a practice check that has, or would have, revealed recent consumption of alcohol, drugs, or substances of abuse or possession of these.
4. Any Employee or sub contractor taking medicine(s) during the working day, which are prescribed by a Medical Doctor, must advise their immediate Manager of such should the medication affect their ability to carry out their duties in any way, and to confirm and agree their proposals for ensuring no other employee can obtain access to such medicine(s).

**5. For-Cause Testing**

For-Cause Testing of Employees and Sub Contractors will be undertaken at the request of a Senior Manager following an Accident/Incident (see above).

**DAP 1****6. Testing under Suspicion**

All Employees and Sub Contractors should present themselves fit for work. Where impairment is suspected, or that any individuals fitness for work, conduct or performance at work may be compromised due to the use of alcohol, drugs or other harmful substances (including abuse outside working hours) a request to undergo a test should be made by a senior Manager.

7. Persons so tested shall be suspended from work until a negative result has been confirmed.
8. Any information obtained by the Practice about a person's health and/or lifestyle which is irrelevant to the purpose of this policy, will not be retained by the Practice.

**Information to Employee's and Sub Contractors**

9. In the event that a positive result is indicated by the instant test, a further confirmation test will be undertaken by a laboratory accredited by the National Measurement Accreditation Service, as in normal testing circumstances.
10. The term "Abuser" is defined as taking any illegal substance, misuse of a prescription drug or misuse of a harmful substance.
11. The blood alcohol level deemed unacceptable to the Company is set at the same level as that of the UK Driving Limit, which is 80 milligram's of alcohol in 100 millilitres of blood or 35 micrograms of alcohol in 100 millilitres of breath.
12. Any trace of an illegal drug/substance is deemed unacceptable. A list of illegal substances deemed as unacceptable and defined by the Misuse of Drugs Act 1971, are, but not limited to:
  - Cannabis
  - Cocaine
  - Amphetamines
  - Barbiturates
  - Benzodiazepines
  - Methadone
  - Opiates

**DAP 1**

13. It is also considered unsafe and a breach of company policy if any of the following substances are abused or misused:

- Glue
- Solvents
- Tranquilisers
- Antidepressants
- Sleeping Pills
- Some Anti-Histamines
- Some Cough Medicines


*Richard Glen*

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Richard Glen  
On behalf of Richard Glen Associates

*1st January 2014*

Date .....