



Anti-Bribery and Anti-Corruption Policy

29 August 2022

RECORDS AND INFORMATION MANAGEMENT
PRACTITIONERS ALLIANCE

Advancing and Connecting the Records and
Information Management Profession

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DOCUMENT CONTROL

Version	Date	Author(s)	Approval	Comments
1.0	29/08/2022	Peter Williams	June 2022	Board Meeting

AMENDMENT, MODIFICATION OR VARIATION

- (a) This Policy is effective from 29 August 2022 and is reviewed every two years.
- (b) This Policy may be amended, varied or modified by the Records and Information Management Practitioners Alliance Global (RIMPA Global) Board.

1 PURPOSE

This anti-bribery policy sets out the responsibilities of RIMPA and those who work for RIMPA in regard to a zero-tolerance position on bribery and corruption.

2 POLICY STATEMENT

RIMPA is committed to conducting business in an ethical and honest manner and has zero-tolerance for bribery and/or corrupt activities. In acting ethically and honestly, RIMPA will:

- Ensure business dealings and relationships are conducted professionally and fairly
- Not engage in any form of bribery, whether it be directly, passively or through a vendor, partner or consultant
- Maintain a gifts and benefits register to ensure transparency
- Seek advice from the CEO or the Board of Directors if uncertain about whether something is a bribe or a gift or act of hospitality and abide by all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate
- Investigate allegations of bribery or corruption and report unlawful activity

3 WHO DOES THE POLICY RELATE TO?

This policy applies to all employees (whether temporary, fixed term, or permanent), consultants, contractors, trainees, or any other person or third-party associated with the activities of RIMPA. The policy also applies to Board and/or Committee members (referred to in this document as 'included parties').

4 DEFINITIONS

Bribery: is the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or an advantage to induce or influence an action or decision. A bribe refers to the inducement, reward, or object/item of value offered to gain commercial, contractual, regulatory, or personal advantage. Bribery is not limited to the act of offering a bribe. Accepting and receiving a bribe is also breaking the law.

Corruption: is the abuse of entrusted power for private gain through dishonest or fraudulent behaviour (for example, accepting a bribe).

Gifts and Hospitality are items received without the expectation of inducement or favour and can be received, provided approval is given and they are registered in the Gifts Register.

5 WHAT IS ACCEPTABLE?

5.1 Gifts and Hospitality

In certain circumstances a gift, benefit and/or hospitality may be accepted, provided that the transaction is not considered a bribe or corrupt activity (as defined above). This section sets out the process for determining whether to accept or decline offers of gifts, benefits and hospitality and how to record them.

5.2 Accepting a Gift

In deciding to accept an offer, consider if the offer could be perceived as influencing the performance of duties or a decision, or lead to reputational damage. The more valuable the offer, the more likely that a conflict of interest exists, or reputational damage will occur.

Questions to ask include:

- Who is providing the gift, benefit, or hospitality and what is their relationship to me or RIMPA?
- Does my role require me or RIMPA to select contractors or award grants?
- Could the giver benefit from a decision RIMPA or I make?
- Are they seeking to gain an advantage or influence RIMPA's or my decisions or actions?
- Has the gift, benefit or hospitality been offered to RIMPA or me publicly or privately?
- Is it a courtesy or a token of appreciation or valuable non-token offer?
- Does its timing coincide with a decision RIMPA or I are about to make or our endorsement of a product or service?
- Are they seeking a favor in return for the gift, benefit, or hospitality?
- Has the gift, benefit or hospitality been offered honestly?
- Has the person or organisation made several offers over the last 12 months?
- Would accepting it create an obligation to return a favor?
- Would accepting the gift, benefit or hospitality diminish member trust?
- How would our members view acceptance of this gift, benefit, or hospitality?
- What would my colleagues, family, friends, or associates think?

5.3 Reporting an offer of a Gift or Hospitality

Any offer of a gift or hospitality above \$100 in value must be reported to the CEO (or the Chair for offers of gifts or hospitality to the CEO) who will arrange for the Gift Register to be updated and will either

- (a) approve retention of the gift by the recipient
- (b) ask the recipient to decline the offer of a gift (when such a decline would not cause offence)

Should there be the potential for offence by declining the offer, then the gift should be accepted and retained by RIMPA as a prize for a member event

5.4 Gift Register

A Gift Register is maintained by RIMPA recording gifts, benefits or hospitality offered to included parties. The Gift Register is updated regularly, upon notification of an included party being offered a gift, benefit, or hospitality.

Access to reviewing or updating the Gift Register is restricted to the CEO and the Board and contains the following information:

- Offered to

- Date offered
- Date received
- Offered by (giver's name, organisation)
- Nature of gift item / benefit / hospitality
- Occasion
- Estimated value
- Circumstances of offer
- Was the gift retained by the recipient?
- Date recorded

5.5 Charitable Contributions

RIMPA can make/receive donations to/from charities. Donations may include services, knowledge, time, or direct financial contributions. RIMPA discloses all charitable contributions it makes/receives.

RIMPA ensures all charitable donations made are legal and ethical under local laws and that donations are made in accordance with the Instrument of Delegation.