

# Global Facilitation Payments Policy

**Trusted to Deliver Excellence**

# Introduction

In most of the countries where Rolls-Royce does business, Facilitation Payments are considered a form of bribery and are illegal. As part of the Company's zero-tolerance approach to bribery and corruption, Rolls-Royce prohibits the making of Facilitation Payments whether or not they are permitted by local or other laws. Paying facilitation payments could cause serious harm to Rolls-Royce.

This Global Facilitation Payments Policy ("Policy") is mandatory and applies to all employees of Rolls-Royce, its subsidiaries and joint ventures which Rolls-Royce controls ("Rolls-Royce" or "Company" or "employees"). A Rolls-Royce employee who is a director on a Board of a non-controlled joint venture should encourage the joint venture to adopt this Policy as a model or use a similar policy. This Policy sets the minimum standard that must be followed. Where local laws, regulations or rules impose a higher standard, that higher standard must be followed. Breaches of the ABC Policies, including this Policy, are not acceptable and may result in disciplinary action up to and including dismissal.

This Policy:

- provides a framework for our approach to Facilitation Payments
- sets out our Facilitation Payment standard

## Common terms

### **Facilitation Payment**

Payment made to facilitate or expedite decisions or actions by government agencies or government officials. This definition of Facilitation Payment does not include the payment of fees to expedite, fast track or speed up a service in accordance with an official and published price list.

# 1. Global Facilitation Payments Policy

## 1.1. Policy

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**With respect to Facilitation Payments, you must not:**

- 1.1.1 make Facilitation Payments (no matter how small the payments are); or
- 1.1.2 allow others (including advisers, agents, consultants, distributors and logistics providers) to make Facilitation Payments on behalf of Rolls-Royce.

## 1.2. All employees

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**With respect to requests for Facilitation Payments, you must:**

- 1.2.1 decline to make the payment and report the request to your own line manager and Rolls-Royce Security or a member of the ABC Compliance team; and
- 1.2.2 report as soon as possible if you know or suspect a breach of any ABC Policy by you or by another person, including those acting on behalf of Rolls-Royce who are not Rolls-Royce employees (for example, logistics providers). Reports should be made to a member of the ABC Compliance team, the Legal Function or the Ethics Line.

## 1.3. All employees

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**If your health, safety or freedom (or that of your family, colleagues or people you are travelling with) could be at risk if you do not make a Facilitation Payment, you must:**

- 1.3.1 never put yourself or your family members in danger;
- 1.3.2 if time permits, and doing so does not put yourself or your family in danger, obtain help and guidance from your line manager Rolls-Royce Security or a member of the ABC Compliance team;
- 1.3.3 if guidance is not available, or if advised to, make the payment and promptly report the payment and the circumstances to Rolls-Royce Security or a member of the ABC Compliance team.

## 1.4. All employees

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**If you have made a Facilitation Payment, the Company:**

- 1.4.1 will not take disciplinary action against you if you genuinely believe that your health, safety or freedom or that of your family, colleagues or people you are travelling with would have been in danger if you had not done so.

## 2. Where to find out more

- The Rolls-Royce ABC Compliance team  
[www.infocentre.rolls-royce.com/compliance/pages/compliance\\_officers\\_contacts](http://www.infocentre.rolls-royce.com/compliance/pages/compliance_officers_contacts)  
or specifically the office of the Chief Compliance Counsel – ABC

**Jo Morgan**

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Email: [Jo.Morgan@Rolls-Royce.com](mailto:Jo.Morgan@Rolls-Royce.com)

- The Rolls-Royce Ethics Line  
[www.rolls-royce.com/ethicsline](http://www.rolls-royce.com/ethicsline)
- The Rolls-Royce Legal Function  
[www.infocentre.rolls-royce.com/legal/pages/AtoZ.htm](http://www.infocentre.rolls-royce.com/legal/pages/AtoZ.htm)
- Rolls-Royce Security  
[www.infocentre.rolls-royce.com/risk/pages/corporate\\_security/people\\_experts.htm](http://www.infocentre.rolls-royce.com/risk/pages/corporate_security/people_experts.htm)

## 3. Other policies you should read

- The Rolls-Royce Global Code of Conduct  
[www.rolls-royce.com/global\\_code\\_of\\_conduct](http://www.rolls-royce.com/global_code_of_conduct)
- The ABC Policies and guidance documents on the Rolls-Royce Compliance intranet pages  
[www.infocentre.rolls-royce.com/compliance](http://www.infocentre.rolls-royce.com/compliance)

**Document control - for internal use only**

<b>STATUS</b>	Final
<b>VERSION NUMBER/FINAL</b>	Version 1
<b>EFFECTIVE DATE</b>	30 September 2014
<b>NEXT SCHEDULED REVIEW</b>	September 2015
<b>SPONSOR</b>	Director of Risk
<b>OWNER</b>	Chief Compliance Counsel
<b>AUTHOR</b>	Chief Compliance Counsel
<b>SUPERSEDES VERSION</b>	First issue
<b>SCOPE</b>	All employees globally, controlled subsidiaries and JVs

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