

Anti-Bribery and Ethical Business Policy

Zero-tolerance controls for bribery, facilitation payments, fraud, conflicts, gifts, records, third parties and ethical conduct in defence and public procurement.

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OWNER	Managing Director
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CLASSIFICATION	PUBLIC

APPROVAL Authorised for issue by Anthony Deacon, Managing Director, on 24 July 2026. This controlled copy is reviewed at least annually.

1. Policy statement

RCDEN has zero tolerance for bribery, corruption, kickbacks, extortion, fraud and improper influence. No commercial opportunity, schedule pressure or customer relationship justifies unlawful or unethical conduct.

2. Scope

This policy applies to RCDEN directors, workers, future employees, agency or temporary personnel, contractors, consultants and other persons acting on the company's behalf. Relevant requirements are flowed down to suppliers and subcontractors where proportionate to the work, risk and contract.

3. Prohibited conduct

- Offering, promising, giving, requesting or accepting anything of value to obtain or reward an improper advantage.
- Facilitation payments, kickbacks, secret commissions or disguised personal benefits.
- Bribery through agents, consultants, distributors, suppliers, joint partners or any other associated person.
- False invoices, hidden rebates, off-book funds, misleading cost or margin records, or deliberate mischarging.
- Using confidential, procurement or security information for unauthorised personal or competitive advantage.
- Retaliating against anyone who refuses improper conduct or raises a genuine concern.

4. Gifts, hospitality and public officials

Gifts and hospitality must be modest, infrequent, lawful, transparent, for a legitimate business purpose and never intended to influence a decision. Cash and cash equivalents are prohibited. Any gift or hospitality above GBP 50 per person, or any item involving a public official, armed-forces representative or live procurement, requires prior written Managing Director approval and entry in the gifts and hospitality register. Customer rules may prohibit items below this threshold and always prevail.

5. Conflicts of interest

Actual, potential and perceived conflicts must be disclosed before the relevant decision or work. The Managing Director records the conflict and defines controls such as recusal, independent review, information barriers, customer disclosure or cessation of the activity.

6. Third-party due diligence

Agents, introducers, consultants and higher-risk suppliers are subject to proportionate due diligence before appointment and during the relationship. Scope may include identity, ownership, sanctions, capability, reputation, conflicts, payment destination, commission rationale, contract terms and evidence of equivalent anti-bribery controls.

7. Books, records and payment controls

Transactions must be accurately described, supported, authorised and recorded. Payments are made only to the contracted party and legitimate bank account unless a documented exception is independently verified and approved. Unusual urgency, secrecy, cash, excessive commission, offshore payment or refusal to document services are escalation indicators.

SIX-PRINCIPLE APPROACH RCDEN's procedures follow the Ministry of Justice principles of proportionality, top-level commitment, risk assessment, due diligence, communication and training, and monitoring and review.

8. Reporting, investigation and review

Concerns must be raised promptly with the Managing Director at anthony@rcden.co.uk, through an applicable customer route or to a competent authority. RCDEN protects genuine reporters from retaliation, preserves evidence and notifies customers or authorities where legally or contractually required.

The Managing Director owns this policy and reviews it at least annually, and sooner after a material change in law, ownership, operations, workforce, supply chain, customer requirement or risk. Actions arising from reviews are assigned, dated and retained as controlled evidence.

Reference framework

The following sources inform this policy. Contract-specific legal, regulatory, security and customer requirements always take precedence.

- [Ministry of Justice - Bribery Act 2010 guidance](#)
- [Bribery Act 2010](#)
- [Cabinet Office - Supplier Code of Conduct](#)

Document control

VERSION	DATE	APPROVED BY	CHANGE
1.0	24 July 2026	Anthony Deacon, Managing Director	First controlled issue

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