



# Double, double toil and trouble...

Zombies, Ghouls and Ghosts are not what keep Compliance Officers up at night!

## Bribery & Corruption

Bribery & Corruption often takes place in secret spooky places. But you can reduce the risk of bribery & corruption in the workplace by spotting red flags, these include:

- A supplier offers you tickets to an expensive sporting event during a tender process;
- A service provider refuses to provide receipts for reimbursable expenses or evidence of services performed;
- Official requests a payment to expedite or obtain a license or permit;
- A payment, suspicious discount or a favor to an individual to secure a contract or specification.



## Supply Chain Risks

Unfortunately, there is a risk that modern slavery can occur in supply chains, today's supply chains are complex and globally dispersed and it can be difficult to know who the sources are.

These human rights abuses include forced labor, human trafficking, child labor and debt bondage.

Recognizing these risks in our supply chain is important, these types of human rights abuses are used across many countries and industries including agriculture, textiles, mining, construction & building materials.

Knowing who you work with and understanding your supply chain is critical to minimize these risks. Don't let suppliers ghost you - asking questions about a supplier's business practices, where they source and manufacture materials and what policies they have in place to protect workers can help identify potential red flags.



## Trade Sanctions

Whether importing or exporting broomsticks, candy or RPM products trade compliance covers a wide range of rules.

It can be a very complex topic but there are a number of key rules we all need to be aware of.

No RPM business is able to buy from or sell to any business or person in, or transit goods through: **North Korea, Iran, Syria, the Crimean, Luhansk or Donetsk Region of Ukraine, Russia or Belarus.**

Transactions with Cuba, Venezuela, or Sudan need RPM General Counsel approval, for Ukraine transactions require Group President and Group Legal Counsel approval.

Raise any concerns you have on these topics to your Legal & Compliance team.



WE ARE RPM AND OUR SUCCESS DEPENDS ON EACH OF US FOLLOWING THE RIGHT ROUTE AND EMBRACING OUR VALUE OF 168® TO MAKE THE RIGHT DECISIONS.

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