

Group Standard	Title: Business integrity standard		
	Function: Rio Tinto Compliance		
	No. of Pages: 20		
	Approved by ExCo: 23 June 2014	Effective: 1 October 2014	Supersedes: Antibribery due diligence standards, November 2009 Fraud standards and guidance notes, January 2010 Business integrity (anti-corruption) standard, January 2012 Business integrity (conflicts of interest) standard, July 2012
No Audit Before: 1 October 2015			
Owner: Global head of Compliance	Approver: Rio Tinto Executive committee	Target Audience: All employees, Core contractors and other contractors as defined in the glossary section of this Standard	
Direct Linkages to other relevant Policies, Standards, Procedures or Guidance notes: Business integrity manual Online Benefits register Online Conflicts disclosure register			
Document purpose: This Standard is key in meeting the following Rio Tinto business integrity commitments to:			
<ul style="list-style-type: none"> • prohibit bribery and corruption in all its forms; • avoid, disclose and manage conflicts of interest; • prohibit fraud in all its forms. 			

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Introduction

<p>What is this Standard about?</p>	<p>We have a “responsibility to work with integrity when acting on behalf of Rio Tinto”. The <i>Business integrity standard</i> (the Standard) helps to ensure we meet that responsibility.</p> <p>This Standard is key in meeting the following Rio Tinto business integrity commitments to:</p> <ul style="list-style-type: none"> • prohibit bribery and corruption in all its forms; • avoid, disclose and manage conflicts of interest; • prohibit fraud in all its forms.
<p>Why is compliance with the Standard important?</p>	<ol style="list-style-type: none"> 1. Living our values. Conducting business with integrity is one of Rio Tinto’s four core values set out in <i>The way we work</i>. 2. Protecting our reputation. How we act when doing business determines Rio Tinto’s reputation. 3. Ensuring sustainable business. External stakeholders want to partner with a company that they can trust to do the right thing. Rio Tinto needs to comply with all relevant laws, including anti-bribery laws.
<p>Who does the Standard apply to?</p>	<p>The general requirements in this Standard apply to all Group employees and core contractors, as well as all other contractors, consultants or outsourced service providers engaged by Rio Tinto. All must abide by the Standard’s general requirements as they form a part of Rio Tinto’s control framework.</p> <p>The procedural requirements in this Standard (for more detail see the <i>Business integrity manual</i>) apply only to Group businesses, employees and core contractors. These include the approval and recording procedures for benefits and conflicts of interest.</p> <p>Third parties acting on Rio Tinto’s behalf (eg agents, lobbyists, travel planners, etc.) should be aware of and abide by the requirements of the Standard as they act on Rio Tinto’s behalf and in Rio Tinto’s name. However, the relevant Rio Tinto contact must perform the procedural requirements. For example, if an agent wants to offer a gift on behalf of Rio Tinto or is organising and paying airfares for a customer, the relevant Rio Tinto contact and manager must follow the approval procedures set out in the Standard.</p> <p>If there is a conflict between the requirements under this Standard and local laws, you should comply with the more stringent requirement. The global head of Compliance must approve any variance from this Standard.</p> <p>Compliance with this Standard is mandatory. Failure to comply may result in disciplinary action up to and including termination.</p>

<p>What is expected of you?</p>	<ul style="list-style-type: none"> • To be fully aware of the Standard's requirements, regardless of your role. • Act and lead by example in behaviour and openness. • Communicate and implement this Standard in your area of responsibility. • Ensure transparent and accurate recording in the books and records. • Managers/supervisors should be accessible and able to assist employees with their queries or concerns and know how to escalate relevant matters to higher-levels of management and/or Rio Tinto Compliance, as appropriate.
<p>Where can I get more information?</p>	<p>More detailed guidance on business integrity issues is available in the Rio Tinto <i>Business integrity manual</i>. This is a 'how to' guide that has been developed for individuals who need a more detailed understanding of business integrity and its associated procedures at Rio Tinto.</p> <p>If you have any questions or are in any doubt as to whether any conduct would fall within the scope of this Standard, you should contact the compliance manager for the Group business that you work for or deal with. A listing of compliance managers is available on the <i>Prospect</i> portal (Compliance community). Alternatively, you can also send an email to a member of the Rio Tinto Compliance team; contact details are also available on the <i>Prospect</i> portal (Compliance community).</p> <p>A Glossary has been included at the end of the Standard which defines key terms.</p>

1.0 Bribery and Corruption

1.1 What is Bribery and Corruption?

Bribery is the offer, giving, demand or acceptance of a financial or other advantage to or from any person in order to improperly secure business or any other advantage.

Rio Tinto employees and core contractors must not commit, be a party to or be involved in bribery or corruption in any form.

Key matters to remember:
Bribery and Corruption may involve anything of value, such as: <ul style="list-style-type: none">• Money• Cash equivalents (eg gift, discount, store cards, cheques)• Gifts• Entertainment and other hospitality• Travel and accommodation• Favours or decisions (such as awarding jobs, contracts, licences, etc.)• Sponsorships and donations
Any person: Bribery and corruption may involve dealings with government officials or with private individuals or enterprises.
Direct or indirect: Bribery and corruption may take place directly or indirectly, for example via a third party such as an agent.
No actual bribe necessary: The offer or demand of a bribe is prohibited under most external regulations; and this Standard. This means even if no bribe is ultimately paid it can still be construed as an offence.
For the benefit of others: You cannot accept a bribe for your own benefit or for the benefit of family, friends or someone else.

1.2 Facilitation Payments

Facilitation payments are small payments normally made to lower-level government officials as a personal benefit to them, to secure or speed up a performance of a routine action to which the payer is entitled (eg licences, permits, visas, customs clearance).

Facilitation payments:

- are a form of corruption;
- are illegal in most countries; and
- can open the door to more serious issues of corruption.

Rio Tinto prohibits all facilitation payments. However, if a payment has to be made due to a direct or imminent threat to personal safety or wellbeing and no alternative exists or can be foreseen given the circumstances, then such payments may be considered. You must exercise the best possible judgment and if a payment has been made ensure that it is:

- reported as soon as practicable to the relevant Group executive, global head of Compliance and head of Global Security; and
- recorded in Rio Tinto's books and records.

2.0 Fraud

2.1 What is Fraud?

A fraud is any intentional or deliberate act to deprive Rio Tinto or an external party with whom Rio Tinto transacts, of anything of value by deception, or other unfair means. This includes internal fraud, when an employee obtains personal gain through the deliberate misuse or misapplication of Rio Tinto's resources or assets.

Fraud is a criminal offence and is a violation of this Standard. Individuals must not knowingly commit, or be a party to, or be involved in, fraud.

Fraud includes any theft or misappropriation of Rio Tinto funds or assets, which can include:

- Money
- Cash and cash equivalents
- Company credit card misuse
- Plant, equipment and inventory
- Confidential information, know-how and other Intellectual property
- Employee and customer/supplier information

Other fraudulent activities include:

- Falsifying accounting records or company books and records for the purpose of deception or to mislead others
- Overcharging on invoices
- Claiming of expenses never incurred or falsification of claims
- Money laundering
- Accounts receivables and payables fraud eg fictitious sales and refund entries, manipulating vendor details and creating bogus vendors

3.0 Benefits – Gifts and Hospitality

3.1 What are Benefits and when are they acceptable?

Benefits are things of value that are exchanged between Rio Tinto and an external party for which the recipient has not paid or paid less than market value. Benefits can be divided into the following categories:

- Gifts
- Meals
- Entertainment
- Travel and lodging expenses
- Other contributions

'Other contributions' are any other benefits given or received which do not come within the other specific categories. This would include, for example, daily allowances for living expenses (per diems).

3.2 Why are Benefits of concern?

Depending on their size, frequency and the circumstances, benefits can be perceived as improperly influencing business decisions and may be considered or perceived as a bribe.

Before giving or receiving a benefit, you should always ask yourself – could this action create an appearance of bad faith or improper behaviour? If the answer is yes, you must not offer or accept the benefit.

You must not misuse your position within Rio Tinto to demand or receive benefits from external parties.

If the recipient has direct or indirect decision-making responsibility over an anticipated or pending business decision that will affect Rio Tinto's interests, then special caution must be exercised.

Important considerations for benefits, including daily allowances for living expenses (per diems), cash benefits, are contained in the *Business integrity manual* (section 3).

3.3 Key Principles that apply to ALL 'Benefits'

Benefits on a modest scale are commonly used to build goodwill and strengthen working relationships among business associates. Rio Tinto permits the giving and receiving of such benefits when they comply with all the key principles set out below.

P1 The benefit must be permitted by local laws or regulations

P2 You must never knowingly give a benefit if it breaches the recipient's internal policies and standards

P3 The benefit must be given or received in good faith without expecting any benefit in return

P4 There must be a legitimate business purpose

P5 The benefit must be tasteful, decent and consistent with generally accepted standards for professional courtesy

P6 The nature, value and frequency of the benefit must be appropriate to the occasion on which it is given and to the position or role of the recipient

P7 The benefit must be transparently given or received. There must be sufficient documentation and information to identify the giver/recipient, the nature, value and purpose/occasion relating to the benefit.

3.4 Approval and recording of Benefits

To avoid misperception and misunderstanding it is important that any benefits given or received are approved and accurately recorded. The table below gives a summary of the approval and recording process.

The limits given below provide a basic standard. Many companies and national government departments' have laws or internal rules that restrict what their staff and representatives can or cannot accept. In the event of a conflict between the limits in this Standard and a law or limit that is to be followed by the external party, the more stringent of the two should be applied. More information is available in the *Business integrity manual* (section 3).

All Benefits – Limits/Recording/Approvals Process (ie Gifts, Meals, Entertainment, Travel & Lodging, Other contributions)

Country Limits (CL) – Includes countries in which Rio Tinto has a presence

Group A: Country Limit

Travel & lodging: USD 400

All other benefit types: USD 250

Americas: Canada, United States

APAC: Australia, Japan, New Zealand, Singapore

EMEA: Belgium, France, Germany, Iceland, Switzerland, United Kingdom

Group B: Country Limit

Travel & lodging: USD 300

All other benefit types: USD 150

Americas: Argentina, Brazil, Chile

APAC: China (including Taiwan)

EMEA: Portugal, Russia, Spain

Group C: Country Limit

Travel & lodging: USD 200

All other benefit types: USD 100

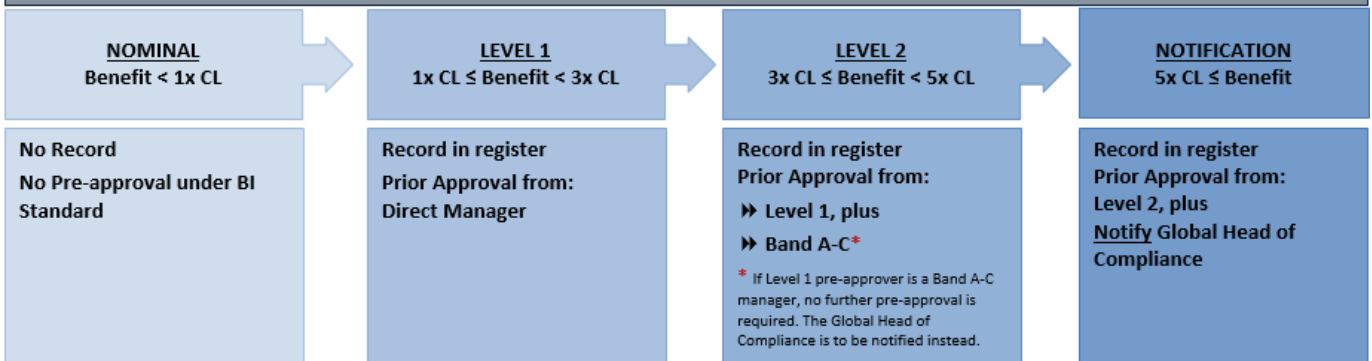
Americas: Peru

APAC: Indonesia, India, Laos, Malaysia, Mongolia, Philippines, PNG, Thailand

EMEA: Kazakhstan, Serbia, Cameroon, Democratic Republic of Congo, Guinea, Madagascar, Mozambique, Namibia, Oman, South Africa, Uzbekistan, Zimbabwe

Thresholds and Required Approval

ALL International Air Travel and Daily Allowance payments (Perdiems) must have a minimum Level 2 Approval, regardless of value



- Country Limits for meals or entertainment are based on a 'per person' basis.
- For all country limits, including those not listed above, refer to the full list of Country Limits. The same recording and approval process applies.

3.5 Dealing with government officials

Although many countries punish corruption in both public and private sectors, the rules applied to dealings with government officials tend to be stricter. Some, government authorities have internal policies or laws that restrict or place limits on the value of benefits that can be paid to government officials. If giving a gift to a government official, you must ensure, to the extent possible, that the government official is legally allowed to receive a personal benefit.

At Rio Tinto, our recruitment process is merit based. When considering the appointment of government officials to a Rio Tinto company position, caution should be taken to avoid any situation where it could be perceived that the appointment was made to obtain favours or for other improper purposes. Group businesses require the approval of their Group executive to:

- engage a politician or government official as a consultant; or
- appoint a politician or government official to a company position with signing or approval authority.

Government officials include:

- employees of state owned enterprises or of a government agency or regulatory authority;

- employees of an international public organisation such as the United Nations, World Bank or International Monetary Fund;
- political party officials;
- individuals who hold or perform the duties of an appointment, office or position created by custom or convention, including some members of royal families and some tribal leaders;
- police officers; and
- children or other relatives of a government official.

If you are in doubt as to whether a person is a government official or the entity is a government owned enterprise, you should consult Rio Tinto Compliance or Legal.

4.0 Sponsorships and Donations

4.1 What are Sponsorships?

Sponsorships can provide a way for Rio Tinto to strengthen and promote the corporate brand. Sponsorships include any contributions of anything of value towards an event, initiative, organisation or other promotional platforms which are owned or organised by an external party. For example, sporting and cultural events, conferences, naming rights for a building or structure.

In the case of a sponsorship there is an expectation of Rio Tinto receiving something of business value in return, such as communication, marketing or advertising rights.

4.2 What are Donations?

Donations are a way for Rio Tinto to contribute to worthy causes and reflect the company as a responsible corporate citizen. They are voluntary contributions made by Rio Tinto to an external party for a charitable purpose, where Rio Tinto receives nothing tangible in return. If Rio Tinto, without requesting, receives things of minor value in return, the activity can still be classified as a donation. A donation can be a financial benefit or an in-kind donation.

For example, donations can be made up of:

- contributions to registered charities, requiring an official tax receipt to be produced; or
- other donations, which are contributions made to non-registered charities or individuals where an official tax receipt cannot be offered.

4.3 Why are Sponsorships and Donations an issue?

They can create problems if they are made to improperly influence business decisions. They can be seen as forms of corruption (for example, 'sponsoring', or 'donating' to illegitimate organisations can be used to conceal corrupt payments).

4.4 Key Principles that apply to ALL ‘Sponsorships and Donations’

All sponsorships and donations must comply with the following key principles:

P1 They must not be offered or given to improperly influence business decisions or obtain favours

P2 They must be transparent and there must be sufficient documentation to identify the recipient, value and purpose

P3 Sponsorships must be justified by a legitimate business purpose

P4 Donations must be voluntary and given to external parties for charitable purposes

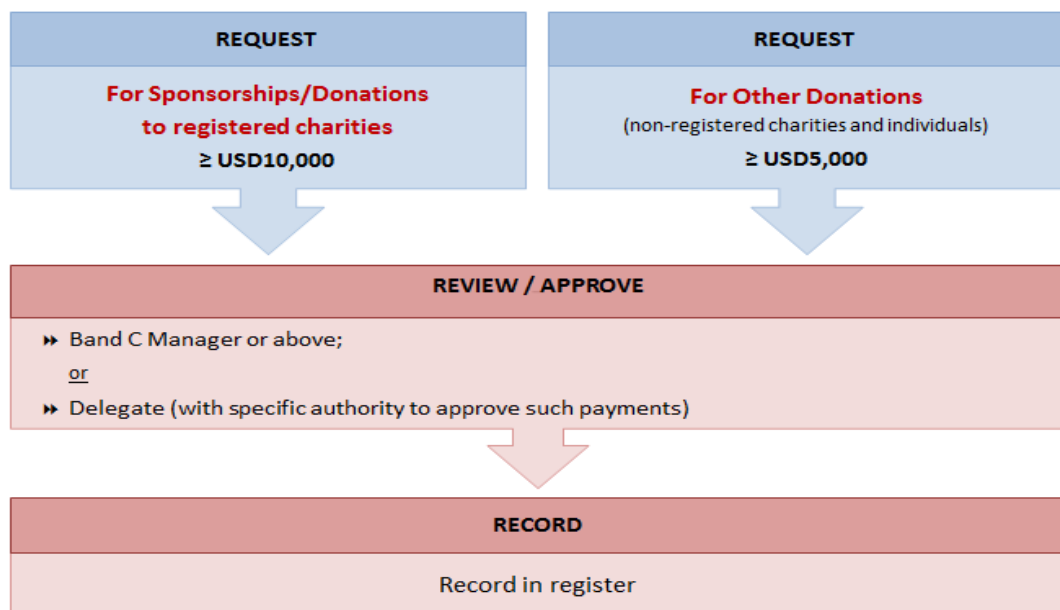
P5 They must not be used as conduits to divert funds to other unintended beneficiaries

4.5 Recording and approval of Sponsorships and Donations

It is important that sponsorships and donations are approved and accurately recorded. The recording and approval process is contained in the *Business integrity manual* (section 4).

A summary of the process is presented in the table below.

Sponsorships and Donations – Approval and Recording Process



- Complying with the ‘Key Principles’ is mandatory for all Sponsorships and Donations
- The Approver and Initiator must not be the same person

5.0 Conflicts of Interest

5.1 What is a Conflict of Interest?

A *conflict of interest* arises when your own personal interests (eg relationships, activities or obligations) are inconsistent or interfere with the interests of Rio Tinto or your duties to Rio Tinto. **You are not allowed to obtain or provide any advantage as a result of a conflict of interest.**

Learn to recognise all actual or potential conflicts of interest as they arise. Some common situations where conflicts can arise include:

Outside work interests

- You work for an external party that does (or could potentially do) business with, or compete with Rio Tinto. This includes working in any capacity, such as employment, consulting, advising, acting as agent, being a director or officer and volunteering.
- You have secondary employment or side-line work which leads to a decrease in your work performance or impacts your duties for Rio Tinto.

Investments and financial interests

You, a relative, or an associate has a significant ownership (5% and above) or controlling interest in an external party that does (or could potentially do) business with, or compete with Rio Tinto.

Relatives or associates who are government officials interacting with Rio Tinto

You have a relative or an associate who is a government official with whom Rio Tinto has (or could potentially have) some form of interaction or dealing. One example is, where the government official has a role in granting a permit or licence to Rio Tinto, or in an approval affecting Rio Tinto.

Other personal relationships

- You hire a relative or an associate as an employee, contractor or consultant.
- You have influence over the job performance evaluation or compensation of any person who is a relative or an associate.
- You have a relative or an associate who is employed by, or is a director of an external party that does (or could potentially do) business with, or competes with Rio Tinto.

5.2 Why should Conflicts of Interest be of concern?

While conflicts of interest should be avoided wherever possible, conflicts will sometimes happen and will need to be managed. Conflicts of interest can – if not identified, disclosed and managed effectively – cause you to be at risk of putting your private interests above the interests of Rio Tinto or perceived to be doing so. In some cases, conflicts of interest can give rise to serious wrongdoings, such as corruption.

- Conflicts of interest can cause others to question your actions, reputation and integrity.
- Conflicts of interest can cause severe consequences for you, your co-workers and Rio Tinto.
- Conflicts of interest are not in themselves a sign of wrongdoing – they are merely risks to be recognised and managed.

Be alert to situations that create or may create a conflict of interest during the course of your work at Rio Tinto. Even the perception of a conflict of interest could negatively affect you and/or Rio Tinto, potentially causing reputational harm and financial loss.

5.3 Key Principles that apply to managing and disclosing ALL 'Conflicts of Interest'

All conflicts of interest must comply with the following key principles:

P1 You are not allowed to obtain or provide any advantage as a result of a conflict of interest

P2 You have a duty to disclose your conflicts promptly through the *Conflicts disclosure register*

P3 If you become aware of, or suspect the occurrence of a conflict of interest that may not have been disclosed, you must report the matter to your manager or a senior manager

5.4 When and how to disclose a Conflict of Interest?

As soon as you become aware of an actual or potential conflict of interest, it is important that you promptly disclose all relevant details according to the process outlined in the chart below.

Managers have a duty to prevent and detect conflicts of interest and to encourage all their employees and core contractors to disclose them.

Employees and core contractors who are newly hired or commencing new roles need to pay particular attention and promptly disclose any conflicts that might arise from their new role. Employees in senior roles will be required to certify in the annual integrity and

compliance certification whether or not they have disclosed all relevant conflicts of interest.

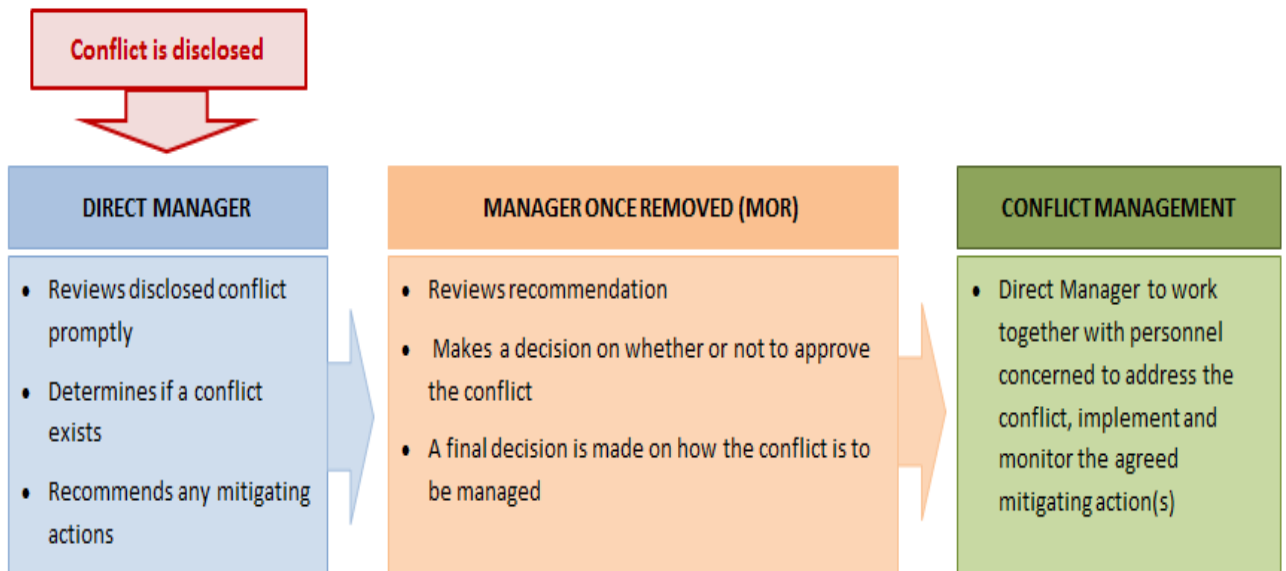
Who	When	How
All Rio Tinto employees and core contractors		Online, or paper-based register
On-going obligation to disclose Immediately on becoming aware of an actual or potential conflict of interest		
Senior roles (Band E and above) – Additional requirement		
Annual certification		

5.5 Managing a Conflict of Interest

It is essential for employees and core contractors who disclose conflicts of interest, have their conflict of interest situation managed consistently, fairly and transparently and in accordance with the process contained in the *Business integrity manual* (section 5).

A summary of the conflicts management process is presented in the table below.

Managing Conflicts of interest



6.0 Third Party Due Diligence

6.1 Know your customer/supplier

A significant component of our business involves working with other non-Rio Tinto third parties whether it is the customers we sell to, suppliers we use to provide goods and services, joint venture partners, business partnerships, agents or acquisition and divestment targets.

In many cases Rio Tinto can suffer damage as a result of the activities of the third parties we interact with, or be held responsible for the illegal activities of our partners and agents, especially where we may be perceived as having approved or directed their activities. This may be in connection with a third party having been involved in bribery or other corruption, human rights issues, money laundering or other similar issues. It may also be as a result of the people that the third party deals with or the countries in which it operates. The third party may be legally allowed to conduct such activities locally but Rio Tinto may not be able to work with these third parties, because it is listed in the UK and Australia and has operations in the US, all of which have stricter regulations.

Before engaging with any third party, each Group business is responsible for conducting an appropriate risk assessment on that third party and, if required, conducting an appropriate due diligence in accordance with the process contained in the *Business integrity manual* (section 6).

The conduct and results of the risk assessment and due diligence process should be documented and retained on file. The degree and manner of due diligence required should align with the risk assessment performed. The relevant business unit is responsible for ensuring an appropriate mitigation plan is in place for any issues identified.

On the renewal of any relationship with a third party the relevant Group business is responsible for ensuring that any previous risk assessment or due diligence is still valid and there have been no significant changes which would change the overall conclusion. If there have been significant changes, the business unit should consider revising the risk assessment and due diligence process.

Group businesses should consult with Rio Tinto Legal or Compliance or Global Security if they have any questions or concerns around the conduct of the risk assessment and due diligence exercises.

6.2 Joint Venture integrity and compliance processes

A joint venture is any business or venture in which a member of the Rio Tinto Group holds an interest of less than [100%].

Before entering into any joint venture (managed or non-managed), Group businesses must follow the joint venture processes contained in *Business integrity manual* (section 6). These processes relate to due-diligence, contractual requirements designed to promote integrity and compliance within the joint venture, and monitoring.

7.0 Reporting of Violations

7.1 How do I report violations of this Standard?

Everyone at Rio Tinto has a responsibility to report violations of this Standard. Rio Tinto will take appropriate action on any reported violations.

If you are aware of, or suspect, a violation of this Standard you must report the matter using one of the following reporting channels:

You can:

- talk to your manager or supervisor – this is often the best person to contact first;
- contact your compliance manager;
- contact a Rio Tinto lawyer;
- contact Rio Tinto Compliance; or
- use *Speak-OUT*, our whistleblowing programme ¹.

Investigations and management of suspected violations will be carried out in accordance with the procedures contained in the *Investigations Procedure*, available on the *Prospect* portal (Compliance community).

No action will be taken against anyone for reporting in good faith a suspected violation of this Standard. However, baseless reports made with malicious intention will not be tolerated.

¹ Subject to local laws

Glossary

Associate includes a:

- person with whom personal business is conducted;
- close friend;
- person who is a trustee of a trust in relation to which the employee or core contractor may benefit; or
- director or officer of a company or other entity over which the employee or core contractor has substantial control.

Benefits are things of value that are exchanged between Rio Tinto and an external party for which the recipient has not paid or paid less than market value.

Bribery is the offer, giving, demand or acceptance of a financial or other advantage to or from any person in order to improperly secure business or any other advantage.

Core contractor means the following:

- category 1 contractors ie essentially replacement persons engaged on temporary contracts to work under Rio Tinto supervision within existing operations. This could include both individuals employed through labour brokers and those employed as temporary staff;
- any external contractors, consultants and other service providers when performing internal duties or roles for Rio Tinto having access to internal systems and required to follow Rio Tinto procedures;
- anyone determined by a Group business to be a core contractor required to comply with Rio Tinto policies and procedures.

Conflicts of interest exist when your own personal interests (eg relationships, activities or obligations) are inconsistent or interfere with the interests of Rio Tinto or your duties to Rio Tinto.

Daily allowances (per diems) means a payment calculated on daily basis that estimates the reasonable cost of travel, meals, accommodation and other reasonable costs that an external party will incur to attend a Rio Tinto business meeting or event.

Donations are voluntary contributions made by Rio Tinto to an external party for a charitable purpose, where Rio Tinto is not paid nor receives anything tangible in return.

Employee includes directors, officers and staff (whether permanent or casual, full time or part time) and temporary hires employed directly by the Rio Tinto Group but do not include contractors and agents.

Facilitation payments are small payments normally made to lower-level employees as a personal benefit to them, to secure or speed up a performance of a routine action to which the payer is legally entitled (eg licences, permits, visas, customs clearance).

Fraud is any intentional or deliberate act to deprive Rio Tinto or an external party with whom Rio Tinto transacts, of anything of value by deception, or other unfair means.

Gifts mean anything of value given or received where the recipient does not pay fair market value.

Government officials include:

- employees of state owned enterprises or of a government agency or regulatory authority;
- employees of an international public organisation such as the United Nations, World Bank or International Monetary Fund;
- political party officials;
- individuals who hold or perform the duties of an appointment, office or position created by custom or convention, including some members of royal families and some tribal leaders;
- police officers; and
- children or other relatives of a government official.

Group business means a Rio Tinto product group; or a collection of global functions under the management of a Group executive.

Group executive means the product group chief executive or, in the case of global functions, their executive sitting on the Rio Tinto Executive committee.

Other contributions mean any other benefit given or received without consideration, which does not qualify as any of the more specific benefit categories (eg meals, gifts, entertainment, etc). For example, this would include daily allowances for living expenses (per diems).

Per diems refer to 'daily allowances'.

Personal interest includes your financial interests, your personal relationships, interests related to your other outside activities or other personal obligations.

Relative means an immediate family member and includes a spouse, partner, parent, child and sibling whether by blood, marriage or adoption (including in-laws) and includes anyone residing in a person's home (other than a tenant or domestic employee).

Rio Tinto, Rio Tinto Group, or Group means Rio Tinto plc, Rio Tinto Limited and any business which is directly or indirectly wholly or majority owned, or managed, by Rio Tinto plc or Rio Tinto Limited.

Senior role means a person in a Band E and above position.

Sponsorship means any contributions of anything of value towards an event, initiative, organisation or other promotional platforms which are owned or organised by an external party in exchange for Rio Tinto receiving something of business value in return, such as communication, marketing and/or advertising rights.