

Business integrity guidance

October 2005
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This document offers guidance to Group managers implementing the policies on business integrity and political involvement set out in *The way we work*, Rio Tinto's statement of business practice.

Rio Tinto

Rio Tinto is a leader in finding, mining and processing the earth's mineral resources. The Group's worldwide operations supply essential minerals and metals that help to meet global needs and contribute to improvements in living standards.

In order to deliver superior returns to shareholders over time, Rio Tinto takes a long term and responsible approach to the Group's business. We concentrate on the development of first class orebodies into large, long life and efficient operations, capable of sustaining competitive advantage through business cycles.

Major products include aluminium, copper, diamonds, energy products (coal and uranium), gold, industrial minerals (borates, titanium dioxide, salt and talc), and iron ore. The Group's activities span the world but are strongly represented in Australia and North America with significant businesses in South America, Asia, Europe and southern Africa.

Wherever Rio Tinto operates, the health and safety of our employees is our first priority. We seek to contribute to sustainable development. We work as closely as possible with our host countries and communities, respecting their laws and customs. We minimise adverse effects and strive to improve every aspect of our performance. We employ local people at all levels and ensure fair and equitable transfer of benefits and enhancement of opportunities.

Executive summary

This document offers guidance to managers in Group businesses implementing the policies on business integrity and political involvement set out in *The way we work*, Rio Tinto's statement of business practice.

The guidance is being issued now:

- to comply with relevant legislation;
- to confront dilemmas faced; and
- to improve still further our performance.

The OECD Convention on bribery commits signatory governments to make bribery by their nationals of foreign public officials a criminal offence. Our policy already goes even further but we need to make sure there are no gaps or confusion in its implementation. UK legislation on bribery and corruption makes no exemption for facilitation payments.

Compliance and implementation

Managing directors of Group businesses should issue instructions based on this guidance, where necessary strengthening management systems and making changes to their codes of conduct. In addition, they are responsible for drawing our policies to the attention of business partners.

Managing directors will be asked to report on their implementation of this guidance in the annual Internal Control Questionnaire.

A number of programmes are now in operation to try to ensure that we conduct business with fairness, integrity and openness. These include *Speak-OUT*, the compliance programme and Internal Control Questionnaire.

Political involvement

Rio Tinto's prohibition of political payments applies to political parties and organisations as well as to individual incumbents and candidates; it covers:

- loans, contingent pledges, gifts, dues and subscriptions;
- fees for conferences, dinners, or similar events, or the purchase of publications, where a significant fund raising element is involved; and
- payments to charities, lobbying firms, or other organisations, which are fronts for, or which channel funds to, political parties or individuals.

The spirit of Rio Tinto's policy should also be applied in parts of the world where formal political institutions may be weak or non-existent. In these cases, our community spending ought to benefit local people as a whole rather than enrich influential individuals.

Nothing in this policy seeks to restrict employees acting purely in their capacity as individual citizens from participating in the democratic political process.

Gifts and entertainment

Gifts and entertainment should be offered and accepted only for conventional social and business purposes at a level appropriate to the status and seniority of those involved. Great care must be taken to avoid any impression of a reward or encouragement for a favour or for preferential treatment. Managing directors

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should set explicit limits for their businesses and interpret these, as well as the nature of what is given or received, according to these criteria.

Bribery

Rio Tinto prohibits bribery in all its forms. This ban applies to:

- attempts to secure improper advantage in any area, for example environmental permits, customs, or judicial proceedings;
- the offer of any form of undue reward, not just money, including employment or lavish hospitality;
- all mechanisms for channelling undue payments or other benefits, or for masking their purpose, whether as ‘kickbacks’, subcontracts, purchase orders, consultancy agreements, or through agents; and
- any deal on concessional terms with politically influential individuals or companies or organisations linked with them.

Direct and indirect payments must only be made for legitimate business services and at a rate that reflects their market value. Contracts or agreements should always document precisely the services provided.

Agents, intermediaries, and business partners

Agents or other intermediaries should only be hired if we are satisfied that they will not engage in bribery on our behalf and should on no account be used as a surrogate for political payments. A similar approach should govern our dealings with business

partners. Agents and business partners should be made explicitly aware of Rio Tinto's policies and of our expectations. It is the responsibility of managers to ensure that they comply with these policies.

Facilitation payments

The only way to guarantee compliance with UK laws on bribery is to avoid making facilitation payments anywhere in the world. If there is a cause for suspicion, only consider making the payment if the official can provide a formal receipt or written confirmation of its legality.

Corruption in the broader environment

There are no simple solutions where government officials or other parties with some indirect link to our business are behaving corruptly, but where we have limited influence over their actions. In such cases, managers should exercise extreme caution. We may decide not to become involved in a project because we have suspicions about the practices of our potential partners or state agencies. For this reason, we should review corruption issues as part of the due diligence process.

Similarly, if we are already involved in a project where corruption allegations arise, we need to clearly state Rio Tinto's policies and exert pressure wherever it is legitimate for us to do so.

April 2003

Business integrity guidance

Guidance for managers on implementing the policies on business integrity and political involvement in *The way we work*.

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Background

Why do we need guidance?

Rio Tinto has always been committed to conducting its business according to the highest standards of fairness, integrity and openness, reflecting the ethical values of both employees and management. This has been underpinned in recent years by *The way we work*, our statement of business practice, the codes of conduct now in place at all operations, the new compliance programme, the development of *Speak-OUT* and employee communication systems throughout the Group.

The way we work contains a number of policies relevant to this area including:

- on business integrity: “Bribery, in all its forms, is prohibited. We neither promise, offer nor accept bribes or anything which could be taken for one, either directly or indirectly.”; and
- on political involvement: “Rio Tinto does not directly or indirectly participate in party politics nor make payments to political parties or individual parties or individual politicians. Rio Tinto represents views to government and others on matters affecting its business interests and those of shareholders, employees and others involved in our activities.”

So why the need for further guidance? There are three main reasons.

First, we need to ensure we comply with

legislation and standards in this field. As a result of a recent international agreement – the OECD Convention on combating bribery – many countries are strengthening their domestic laws to forbid the bribery of foreign public officials. Although our policy on bribery in *The way we work* already covers the ground, we need to make sure there are no gaps or confusion in our implementation of the policy.

We need as well to ensure compliance with the revised OECD Guidelines for Multinational Enterprises, which we have publicly supported. These contain some detailed antibribery provisions. Legislation in the UK gives extraterritorial reach to the existing statutory and common law on bribery and corruption with effect from February 2002. There is also now legislation in the UK relating to the making of political payments. This is a separate issue from bribery, but it is also covered in this guidance.

The second, related, reason is that we need to confront openly the dilemmas we sometimes face on the ground. The dividing line between acceptable and unacceptable behaviour is not always obvious although sound judgement and inherent integrity is expected of our employees. For example, at what point does a legitimate small gift become a bribe? What constitutes acceptable involvement in the political process? Unlike bribery, political involvement may be perfectly legitimate – indeed, at a personal level, it is an essential

aspect of the democratic process. Nonetheless there are still a number of grey areas relating to this issue on which we need to make our position, and our guidance to employees, clear.

The third reason is that we want to continue to improve our performance in this area, as on other aspects of social responsibility, such as community relations and human rights. This guidance aims to help reinforce the ethical culture of Rio Tinto.

There is also a good business case for taking a firm stance in this area. A reputation for incorruptibility makes it less likely that we will be approached for bribes. It fosters trust and loyalty among both our employees and business partners. Public scrutiny in this area is growing ever more intense: there is now a consensus among policymakers that corruption presents an obstacle to sustainable economic growth in many countries. Though the behaviour of major multinational companies is not the main problem in this area, they are increasingly the focus of public scrutiny and media reporting, and are encouraged to exercise their influence as far as possible, both individually and in cooperation with others.

What do we need to know about the legislative trends in this area?

Starting with legislation on corruption (and this is distinct from the issue of political involvement, which is dealt with below), there have been a number of recent

international agreements in this area. However, it has been the OECD Convention on combating bribery, which came into force in 1999, that has driven much of the subsequent national legislation. The Convention commits signatory countries to make bribery of foreign public officials a criminal offence. Put another way, countries are now obliged to pass laws prohibiting bribery beyond their borders. The legislation needs to establish what is sometimes referred to as 'extraterritorial jurisdiction': it means that, in certain circumstances, a multinational company could be prosecuted in the courts of the UK, say, or the US, or Australia over bribery in another country.

The Convention also commits signatory countries to prohibit off the book accounts, and other accounting tricks aimed at hiding bribery. It covers as well the payment of bribes through intermediaries.

From a legal perspective, the situation is complex. Different countries are implementing the Convention in slightly different ways. Definitions of bribery differ, for example, as do rules relating to small facilitation payments. Also variable is the way in which domestic laws apply to bribery in foreign countries. In response to the Convention, the US updated its long standing Foreign Corrupt Practices Act, Australia has amended its 1995 Criminal Code Act, and the UK has used its Anti-terrorism, Crime and Security legislation to extend its anticorruption laws to conduct by UK nationals or companies in any foreign country. All this means that different parts of

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Rio Tinto, and employees of different nationalities within the Group, will fall under the ambit of bribery legislation from one or more countries other than the one in which they happen to reside or conduct business.

This guidance, however, aims to provide a simple solution. By setting out a clear framework which errs on the side of caution, it is intended to keep Group employees on the right side of these laws – and also the Group's own policies and ethical principles – wherever they operate in the world, and whatever their nationality.

If there are any cases of doubt, Group businesses should seek advice from Rio Tinto External Affairs. However, it remains the primary responsibility of Group businesses to ensure that they act in compliance with the laws of the countries in which they are based. The purpose of this guidance is to explain the additional obligations on operations as a result of extraterritorial laws and the Group's own policies.

With regard to political involvement, the guidance focuses on practical implications of the policy in *The way we work*. This prohibits payments to political parties, and is stricter than the legal minimum in many countries. However, the guidance also provides a simple means by which we can ensure compliance with a recent piece of UK legislation, the Political Parties, Elections and Referendums Act, 2000. Although this Act does not prohibit 'political donations' or 'political expenditures', it obliges companies to seek shareholder approval in advance for

payments falling within its ambit, and/or, to disclose them in their annual report. Provided we can make doubly sure that we are not making any such payments, these provisions in the Act will not require any action from us.

The guidance also draws on the codes of conduct of Rio Tinto businesses, many of which contain examples of best practice. Specifically, it does not deal in detail with a number of key issues, such as conflicts of interest and fraud, as these are covered fully in individual codes of conduct.

The guidance draws as well on various voluntary external codes. These include the OECD Guidelines for Multinational Enterprises (as already mentioned), the International Chamber of Commerce's Rules of Conduct on Extortion and Bribery, and also a set of principles developed by Transparency International, a leading anti corruption campaign group, in partnership with companies and other organisations.

Will we lose business by taking a strong stance in this area?

In the short term we may have lost and may continue to lose business to firms which are willing to engage in bribery or which make regular political payments. In the past, we have certainly turned down opportunities to invest in certain places partly because a corrupt political system would have made it impossible for us to operate according to our policies and practices.

In the long run, however, our reputation for integrity is more valuable, and helps set us apart as a trusted partner for governments, communities and other businesses. As already mentioned, we are less likely to be approached for bribes if our reputation precedes us. Moreover, with popular anti corruption movements growing in many countries, business deals secured through corrupt means are likely to be overturned sooner rather than later.

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Guidance

Compliance and implementation

This section covers compliance with the particular issues raised in this guidance. In addition, the Group Compliance officer is reviewing the compliance system for all Rio Tinto's policies and legal obligations.

As a basic principle, managing directors are responsible for ensuring that the policies in *The way we work* are implemented in their particular businesses. They should issue instructions as appropriate to staff based on this guidance, strengthening management systems, such as induction of new employees and training of existing employees, where necessary. They also should make any necessary changes to their codes of conduct. In addition they are responsible for drawing our policies to the attention of business partners.

In terms of Group wide management systems, managing directors will be required to report through the annual Internal Control Questionnaire on how they have implemented this guidance. As on other issues, the Internal Audit department may make further inquiries as appropriate.

Employees must be made aware that they will be supported in their efforts to comply with the Group's policies in this area, whatever the inconvenience or extra costs involved. The chairman of Rio Tinto has committed that no employee will suffer in any way if we lose business as a result of his or her refusal to pay bribes. Equally, infractions of our policies in this area are

likely to result in disciplinary action, up to and including termination of employment.

The rest of the guidance sets out some clear prohibitions, but also raises a number of dilemmas where the correct course of action will depend on the precise nature of the local situation. In such cases, there are two general principles to bear in mind:

- There should be only one set of books, and no transactions should be entered into that cannot be transparently included in them. Nothing must be done or omitted which might affect the integrity of our internal or external audits.
- We should not do anything that would put in doubt the Rio Tinto Group's commitment to business integrity if it were accurately reported in a local or international newspaper, or made public in some other way.

If there are any cases of doubt or questions as a result of this guidance that cannot be resolved locally, External Affairs should be contacted. Depending on the nature of the inquiry, External Affairs will draw in expertise from other Group functions, including the Legal department, Internal Audit, the company secretary, and the Group Compliance officer, as appropriate.

This is in addition to Rio Tinto's systems of financial control that are in place to provide assurance regarding:

- the safeguarding of assets against unauthorised use or disposition: and

- the maintenance of proper accounting records and the reliability of financial information used within the business or for publication.

Rio Tinto has developed the following programmes which underpin its business integrity:

Internal Control Questionnaire

The Internal Control Questionnaire is a risk management system designed for each Group business to respond to questions relating to legal risk, financial control risks, business integrity risks and political involvement risks linked to the implementation of and the adherence to *The way we work*. It is supervised by the head of Internal Audit.

Group compliance programmes

These programmes are designed to prevent and detect non compliance with local laws and regulations, as well as non compliance with Rio Tinto's policies, procedures and practises set out in *The way we work* and in the codes of conduct adopted by the individual Group businesses in conformity with *The way we work*. The programmes are being developed to promote the sensitisation, education and training of employees in the key substantive areas of legal policy and procedure requirements which apply Group wide. These programmes will help foster a common corporate approach across Rio Tinto's global operations.

Speak-OUT

The Group's *Speak-OUT* programme is a 'whistleblowing' system which allows employees, confidentially and without fear of reprisal, to alert senior management about their concerns over possible acts which are contrary to Rio Tinto's business policies and practices; those which may be against the law; and those which may otherwise give senior managers cause for concern.

Political involvement

Nothing in Rio Tinto's policy seeks to restrict employees acting purely in their capacity as individual citizens from participating in the democratic political process.

Rio Tinto's policy in this area goes beyond legal requirements in many countries. *The way we work* prohibits payments by Group businesses to political parties and their participation in party politics. The reason for this strict approach is that, while many aspects of political involvement are perfectly legitimate, the line between political donations and corruption can become blurred in practice. The dangers may vary from country to country, but the firm ground for a company like Rio Tinto will be to apply the same approach on a worldwide basis. We have therefore chosen to prohibit such payments altogether.

This does not stop us making our views known to governments and other parties on matters affecting our business interests. We may do this in our own capacity,

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or through industry associations or consulting firms.

We can allow employees time off to undertake civic duties, providing the leave is unpaid and granted irrespective of political affiliation. In fact, such activities should be encouraged as part of our civic involvement.

Our prohibition on political payments applies not just to political parties and organisations, but also to incumbents and candidates. It means, among other things:

- we must not make loans, contingent pledges (eg underwriting events or publications), or gifts, nor pay membership fees or subscriptions, to political parties or individuals;
- we must not make contributions in kind (eg supplies of equipment or the provision of services) except where this is done on a proper contractual basis and demonstrably at a commercial rate;
- the payment of admission fees to conferences, dinners, or similar events organised by political parties or their supporters, or the purchase of their publications, should be avoided in all cases where there is a significant fund raising element involved;
- providing politicians with travel and accommodation is only permissible if this is for a legitimate business purpose, such as facilitating a visit to one of our operations, and does not contravene our policies on gifts and bribery;
- while staff are free to make political contributions in their individual capacity and

from their own pocket, we must not in any way match, direct, or suggest they direct, their contributions to particular parties or individuals; and

- we must not make payments to charities, lobbying firms, or other organisations, which are fronts for political parties or individuals, or which provide means to channel funds to them.

We also need to follow the spirit of Rio Tinto's policy in this area when considering investments in or when working in parts of the world, such as remote regions, or certain developing countries, where formal political institutions such as local parties may be weak or non-existent. Even in these situations there are usually individuals, such as community leaders, who are politically influential in the local area. In these cases, we need to try to ensure that our community expenditures benefit local people as a whole rather than enriching such individuals or their supporters.

As mentioned above, this section of the guidance is now reinforced by legislation in the UK, the Political Parties, Elections and Referendums Act, 2000, which obliges companies to seek shareholder approval in advance for payments falling within its ambit, and/or, to disclose them in their annual report. Provided we can make doubly sure that we are not making any such payments, these provisions in the Act will not require any action from us.

If Group businesses are unsure whether

a potential payment would be deemed to be 'political', either under Rio Tinto's own policy or under the UK Act, they should seek advice from External Affairs in the first instance.

Gifts and entertainment

In certain circumstances, the giving and receiving of small gifts and entertainment is perfectly acceptable, and is quite distinct from bribery. A business meal, for example, can provide a relaxed forum for exchanging information.

Nonetheless, exchanges of gifts and entertainment must be subject to strict limits. Depending on their size, frequency, and the circumstances in which they were given, they may constitute bribes or political payments. The key test we must apply is whether *they could be intended, or even be reasonably interpreted, as a reward or encouragement for a favour or for preferential treatment*. If the answer is yes, they are prohibited under Rio Tinto policy.

This applies both to the giving of gifts and entertainment by Group employees and to their receiving of them. It applies also to indirect gifts, such as, for example, unusually high lecture fees.

Managing directors are recommended to set explicit limits for gifts and entertainment for their particular businesses. These should cover the maximum monetary value of gifts that may be given and received, as well as the frequency with which they may be exchanged.

The general rule on conflicts of interest

associated with gifts and entertainment is that they should be avoided. If they appear unavoidable, the member of staff concerned must advise the managing director of the business of all the circumstances beforehand, so that the situation can be properly reviewed and recorded before any problematic decisions are made.

Bribery

Under the OECD Convention, signatory governments must make it a crime: "to offer, promise or give any undue pecuniary or other advantage, whether directly or through intermediaries, to a foreign public official, for that official or for a third party, in order that the official act or refrain from acting in relation to the performance of official duties, in order to obtain or retain business or other improper advantage in the conduct of international business". Complicity, including incitement, aiding and abetting, or authorisation of an act of bribery, are also to be made criminal offences, as will be attempts or conspiracy to bribe. The UK implementing legislation also covers bribery of agents, as well as bribery of public officials.

Rio Tinto's policy in *The way we work* already covers all this ground. It prohibits giving of all bribes, whether or not to public officials, and also the acceptance of bribes or backhander payments relating to the award of supply or other contracts.

Even though we will never initiate the offer of a bribe, in some countries we are sometimes pressured to pay bribes. In such

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cases, we must refuse to pay, however widespread or condoned the practice may be locally.

When it occurs, bribery is rarely as explicit as the exchange of cash for a contract. Rio Tinto's policy prohibits bribery in all its forms. Thus it applies to:

- attempts to secure improper advantage in any area including, for example, environmental permits, customs, and judicial proceedings;
- the offer of any form of undue reward, not just money covering, for example, offers of employment or lavish hospitality; and
- all mechanisms for channelling undue payments or other benefits or for masking their purpose.

This includes the use of 'kickbacks', subcontracts, purchase orders, consultancy agreements, and the improper use of agents. It also includes any other sort of deal arranged on concessional terms with politically influential individuals or companies or organisations linked with them.

Consultancy payments should only be made for legitimate services, and at a rate which reflects their fair market value. Contracts should document precisely the services to be provided.

Similarly, any arrangements we enter into with politically influential individuals or organisations must be for legitimate business purposes only, which are set out in full in our contracts or agreements with them. Wherever possible, we must award contracts on the basis of competitive tendering. Where this is inappropriate or not

possible, we must ensure, and be able to demonstrate, that we are paying no more than a fair market value for the goods or services received.

One difficult issue is that, in some countries where we operate, we may be obliged by local law to pay for the services of public officials, such as customs clearances, local police protection or the visits of environmental regulators. But we do not expect from these officials any unduly favourable treatment as a result. In these cases, therefore, we must make clear in our discussions with such officials, and set out in our written communications with them, that we expect them to do no more or less than to fulfil their legal and regulatory duties. We should request an official receipt for any such payments.

Agents, intermediaries, and business partners

One of the ways in which both bribery and political payments can occur indirectly is through agents and business partners. Unless we are careful, agents who act as intermediaries in our dealings with governments and other parties may channel payments to them without our knowledge or consent. The behaviour of our business partners can affect our reputation in the same way. Given that the OECD Convention (which sets the standard for national legislation) covers bribery "through intermediaries", we could be held liable if we knew about, or deliberately ignored, the activities of such third parties.

Therefore, we should hire agents or other intermediaries only if we have conducted due diligence sufficient to satisfy ourselves that they will not engage in bribery. We should be suspicious if government officials foist them upon us. We should inquire into their reputation, past work, and any other relevant factors, and also be alert to warning signs such as a demand for unusually high commissions or fees stated as a percentage of contract sums, the cost of which would be excessive in relation to the services provided. The services that they provide should be documented in full, and remunerated at a rate which reflects their market value. The agents should be made aware of Rio Tinto's no bribes and no political payments policies, and this should be included in our contracts with them.

A similar approach should govern our dealings with business partners: we should assess their reputation in advance and make explicit our expectation that they follow a no bribes policy. We also should include such wording in our agreements with them. Unlike with agents, we may not always be able to dictate terms to business partners, who may be large or state owned enterprises. The last section of the guidance makes suggestions for dealing with such difficult situations.

Facilitation payments

The OECD Convention does not extend to small facilitation payments, which are also

sometimes known as expediting or servicing arrangements, on the grounds that bringing them within the scope of the criminal law did not appear to be a practical measure. This exemption has been followed through in the implementing legislation of a number of countries, including the US and Australia.

The main distinction thereby implied between facilitation payments and other forms of bribery is that in the case of the former:

- the sum involved is minor and paid to a low level state official; and
- the payment is made to secure an action or service to which an individual or company is routinely and legally entitled. (Such a service might include mail collection, water supply, or a routine processing of government papers such as a visa. It does not include any decision to obtain or retain business, or about the terms of a business.)

In some countries, such payments are regularly demanded and are a common feature of economic life.

The new UK legislation makes no exemption for such facilitation payments. As Rio Tinto is incorporated in the UK, it is possible that it could face liability if any part of the Group, and not just employees who happen to be UK nationals, were to contravene this legislation.

The following is an excerpt from guidance on the UK legislation provided by *British Trade International*, a trade promotion arm of the UK Government:

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“Blanket exemptions are always liable to misuse, and we do not think it appropriate to make an exemption for ‘facilitation payments’. However, we do not envisage any circumstances in which the making of a small facilitation payment, extorted by a foreign official in countries where this is normal practice, would of itself give rise to a prosecution in the UK. The making of such payments may well, however, be illegal under the law of the country concerned.”

Over and above any immediate action, operations should set out a long term strategy for reducing exposure to demands for such payments, inform senior officials of relevant government agencies about any unofficial requests for cash, and seek to build alliances with other firms facing similar problems. Group businesses should inform External Affairs if they face persistent demands for facilitation payments.

Corruption in the broader environment

This last section covers the most difficult situations we confront: that is, when corruption is occurring and has some indirect link to our business, but we have limited power to prevent it. Such situations include:

- the misuse by state agencies or politicians of the tax and other legal revenues raised from our operations; or
- corrupt behaviour by a major business partner which owns a significant share in a mine we operate.

There are no simple solutions in these situations. We cannot just dictate how governments behave, and our influence over business partners may be limited.

Nonetheless, we sometimes may decide not to become involved in a project because we have suspicions about the practices of our potential partners or state agencies. For this reason, we should review corruption issues for each project as part of the due diligence process.

Similarly, if we are already involved in a project where corruption allegations arise, we need to ensure that we clearly state Rio Tinto’s policies and exert pressure wherever it is legitimate for us to do so. A number of tactics may be useful and diplomatic suggestions may achieve the best results. Where appropriate, we should:

- make our own representations to governments or business partners, referring to the policies in *The way we work*, and the possible effect of their actions;
- team up with other companies, possibly through a local chamber of commerce, to lobby for improved standards. Such a combined approach may be the most effective way to persuade state agencies to bring an end to demands for facilitation payments;
- work with other organisations, such as embassies or international development agencies, who may have other avenues to voice opinions to governments. Development agencies are now devoting significant resources to issues of

governance and corruption; and

- seek to support governance and capacity building projects as part of our community contributions.

Rio Tinto External Affairs can provide further advice and assistance in this difficult area.

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Further information and contact details

Should you need further information about this Guidance or should you wish to comment on the content of the Guidance please contact:

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Design consultants Tor Petterson & Partners.

Printed in England by The Beacon Press using their *pureprint* technology.

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10/05