



ROUNDTABLE
INTERNATIONAL

INDEPENDENT PERSONS OF TRUST POLICY

Original Version prepared by the RTI Board 2021-2022



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Dear Member, Tabler or friend of Round Table

Round Table International ASBL, hereafter Round Table International, requires the RTI officers, the RTI Councillors and Members to demonstrate the highest standards of personal and professional ethics in their duties and responsibilities. As representatives of Round Table International, we practice honesty and integrity in fulfilling our obligations to comply with all applicable laws and regulations.

We constantly strive to live and work by our motto of ADOPT | ADAPT | IMPROVE whilst remaining true to our founding values. This policy is intended to enable anyone to raise serious concerns internally so that Round Table International can address any inappropriate conduct and actions. It is the responsibility of all the RTI officers, the RTI Councillors and Members to report concerns about violations of Round Table International's Code of Conduct, ethical breaches or suspected violations of law or regulations that govern Round Table International's operations.

Globally, it is recognised that the most effective source of information to combat inappropriate conduct and actions is anonymous reporting. One of the key obstacles in eliminating improper conduct and actions is providing a safe, trusted platform for individuals to anonymously report their concerns. Individuals are often too fearful of speaking out due to fears of potential victimisation, intimidation or perceived disloyalty to their peers. Having a dedicated policy and procedures to report unethical or unlawful behaviour helps to strengthen our first line of defence in combatting inappropriate conduct and actions.

Should you have any questions or suggestions regarding this policy, please reach out to secretary@round-table.org.

Yours in international Tabling,
RTI Board 2021-2022



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1. General info

This policy is divided into the following sections:

- Duties and responsibilities of the Independent Persons of Trust
- Composition of the Independent Persons of Trust
- Election of the Independent Persons of Trust
- Reporting procedures
- Actions required and timelines
- Reporting of the Independent Persons of Trust
- Responsibilities of the Round Table International Board
- Acting in good faith
- Protection from retaliation and confidentiality
- Changes to this policy

2. Duties and responsibilities of the Independent Persons of Trust

The detailed duties and responsibilities of the Independent Persons of Trust are detailed in the following sections and are summarised as follows:

- Review and assess received submissions
- Investigate or cause to investigate the submissions received
- Reporting on work done
- Protecting confidentiality

3. Composition of the Independent Persons of Trust

The Independent Persons of Trust will compose a panel of members that shall be uneven in number ideally no less than 3 members. This panel can consist of current or past members from the Round Table Family.

To ensure continuity, members will serve for no less than three years on a rotational basis, with one member retiring and another member being appointed annually. During the initial setup of the Independent Persons of Trust, members will have a choice of the length of their terms.

In cases where there is a clash or a conflict of interest of any kind between the Independent Persons of Trust and the matter at hand, the following will apply:



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- The conflicted member will not be allowed to carry on with the matter at hand but will still serve for the remainder of the term on other matters
- A replacement member needs to be appointed to the Independent Persons of Trust team to assist on the specific matter. This person shall be:
 - A previous member of the Independent Persons of Trust, followed by;
 - A nominated, not elected member, of the most recent Independent Persons of Trust as proposed by the associations, followed by;
 - A nominated, not elected member, of the most recent Independent Persons of Trust as proposed by the RTI Board, followed by;
 - A suitable person as determined by the RTI Board.
- This replacement member in the Independent Persons of Trust team will only assist in the conflicted matter and will not serve as an additional Independent Person of Trust for the rest of the term.

4. Election of the Independent Persons of Trust

During the AGM of Round Table International, the election of the Independent Persons of Trust will take place. Applications for the role, or candidates put forward by the associations, must be sent to the RTI Board no later than 42 days before the AGM. All eligible candidates will be circulated along with the RTI meeting pack.

The RTI Board will put forward no less than 5 candidates for the initial election of Independent Persons of Trust and no less than 3 names annually for the new person to be added. There will be no restriction on the number of self-nominations or Associations' nominations.

Candidates will send a brief profile showing their intent and experience in this area that would qualify them to fulfil this role. Candidates must indicate their understanding and willingness to serve the entire term of no less than three years.

Eligible candidates will be elected by a simple majority vote at the Round Table International AGM. All members of the Independent Persons of Trust must be from different regions or from different RT Family members.

The Code of Conduct relating to RTI Officers will apply to the Independent Persons of Trust members.



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5. Reporting procedures

Round Table International has an open-door policy and suggests that individuals share their questions, concerns or complaints. Before escalating this to Round Table International, we encourage anyone to engage with the leadership in their respective Associations first.

A dedicated email address, separate from the RTI Board, will be established under the control of the Independent Persons of Trust. This email address shall be used to report suspected inappropriate conduct and actions.

6. Actions required and timelines

The Independent Persons of Trust will acknowledge receipt to the person who submitted a complaint of the reported violation or suspected violation via email within seven days of receipt of the initial communication.

All submissions received will be reviewed and assessed within two weeks of receipt of the submission by the Independent Persons of Trust for the following:

- Should this have been escalated to the Round Table International Persons of Trust?
- Is the alleged misconduct or violation significant or either cause or has caused a risk to Round Table International or to any member or individual connected to Round Table International?
- Is the alleged misconduct or violation a contravention of the Round Table International Code of Conduct or contrary to the values and ideals of Round Table?

Suppose all of the conditions listed above are not satisfied. In that case, a report as to why must be sent to the person who submitted the complaint. The Independent Person of Trust shall not share this information regarding the nature of the complaint to any external party including the RTI Board.

If all the conditions listed above are satisfied, an investigation into the facts and circumstances must be done.

The Independent Persons of Trust must determine if they have the required skills, knowledge and experience to perform the investigation into the alleged violation themselves. Suppose a separate investigation



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team must be appointed. In that case, this process must be completed within thirty days of the original submission receipt date.

The Independent Persons of Trust must investigate or cause the suspected violation to be investigated sufficiently that a report can be issued clarifying the facts and circumstances surrounding the matter. A record of the report and considerations taken to compile the report must be kept for future use and review.

On completion of the report, the responsibility of the Independent Persons of Trust ends concerning this matter.

7. Reporting of the Independent Persons of Trust

The Independent Persons of Trust reports directly to the RTI Councillors but can send reports to the RTI Board as needed. Reporting to the RTI Councillors will be done no less than twice a year at a Round Table International Councillors Meeting.

This reporting will be in writing as part of the meeting pack and in person or virtually at the RTI meetings. The reporting will include the number of submissions received, the status of the submissions, and the number of matters concluded. Any matters relating to current or past RTI Board members must be reported separately.

In cases where the Independent Persons of Trust is investigating any of the Round Table International executive members, or the Round Table International Board as a whole, they can elect to inform the RTI Councillors in writing of this matter at any time. This is up to their discretion.

Any matters relating to Anti-Money Laundering, Financial or Legal violations must also be reported to the Money Laundering Reporting Officer, the Auditor, or the Legal Advisor. This must be done via email of the final report issued by the Independent Persons of Trust.

8. Responsibilities of the Round Table International Board

The Round Table International Board has the following responsibilities with regard to the functioning of the Independent Persons of Trust:



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- Supporting and respecting the Independent Persons of Trust, including the policies relating to their work and their work results.
- Forwarding the email or communication of the reported violation or suspected violation via email within three days of receiving the initial contact to the Independent Persons of Trust.
- Ensuring that a dedicated email address, separate from the RTI Board, will be established under the control of the Independent Persons of Trust
- Ensuring that a web page or similar reporting structure is made available to the Independent Persons of Trust independent from the RTI Board.
- Providing assistance to the Independent Persons of Trust as requested.
- Sending the report of the Independent Persons of Trust out with the RTI meeting packs.
- Budgeting for one member of the Independent Persons of Trust to attend the RTI AGM and the HYM, paying for the flight, registration and accommodation costs. This amount is budgeted but incurring the cost is at the discretion of the IPT.
- Provide sufficient time on the agenda for the Independent Person of Trust to report to the floor and take questions during the RTI AGM and the HYM, including any councillor meetings.

9. Acting in good faith

Anyone filing a complaint as outlined in this policy regarding a violation or suspected violation shall act in good faith and must have reasonable grounds for believing that the disclosed information indicates a violation. Allegations that prove not substantiated and have been demonstrated to have been made knowingly false or maliciously shall be viewed as a severe violation on its own. This will be noted in the report as issued by the Independent Persons of Trust to consider further action to be taken.

What should or should not be reported is as follows:

Report:

- Suspected violations of any laws or regulations
- Bribery, corruption, or any suspected violations of financial best practices
- Sexual misconduct of any kind



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- Violations of the Code of Conduct or the values of Round Table International, etc

Don't report:

- Anything not related to Round Table International, except when all other avenues have been exhausted
- Petty arguments
- Internal politics
- Personality Clashes, etc.
- Any incident that is older than three years

10. Protection from retaliation and confidentiality

It is contrary to the values of Round Table International for anyone to retaliate against anyone who reported, in good faith, a violation or suspected violation of any kind. Anyone who retaliates against someone who has in good faith reported a violation, is contradicting the values of Round Table International and is subject to action being taken against them.

To protect the confidentiality and as additional protection against retaliation, the complainant is allowed to report violations or suspected violations confidentially. Reports of suspected violations shall be kept confidential to the extent possible, consistent with the need to conduct a sufficient investigation to produce a report as outlined in this policy.

11. Changes to this policy

Due to the independence of the Independent Persons of Trust from the Round Table International Board, all amendments to this policy must be passed by the RTI Council as per the rules outlined in the RTI Rule Book.