

Policy on Training

Introduction

Lack of mandatory awareness training has been a key component in many companies' compliance failures. Awareness and training are also mandatory components of some governments' compliance requirements.

Export control non-compliance is a principal risk for the company. Non-compliance can result in reputational damage, financial penalties and loss of business.

Export controlled goods, software, technology and services exist throughout the Rolls-Royce supply chain, across the company, both military and commercial. It is therefore essential that all staff actually or potentially involved in export controlled activities possess a basic awareness of the issues, are able to raise questions and know where to seek advice. For instance, having access to export controlled information or hardware or being involved in recruitment and placing of staff all have implications for export control compliance. In order to meet our obligations and to provide employees with the tools to comply with the undertakings they have given under the Global Code of Conduct, all employees require basic awareness training on export controls.

Policy

1. General awareness training should be provided globally, be easy to understand, cost effective, relevant and available in local languages as well as English;
2. Training will be recorded on our Learning Management System where available;
3. Wherever practical all employees should ensure that they complete either annual on-line or face to face export control training;
4. Export control training should be given to all new starters within the company;
5. Business and functions should mandate line management to ensure that their staff undertake the annual training that is available;
6. The corporate export control team and local export control managers will ensure that training material is updated in line with regulatory changes.
7. After general awareness training is available globally, the requirements for further, deeper levels of training will be addressed for those staff that require or seek it.
8. Developmental training will be provided to export control managers and export points of contact that is relevant to their business/function and geographic location.