

ANTI-BRIBERY & CORRUPTION POLICY

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1. Policy Statement

- 1.1 RA (or "Company") is committed to conducting business transparently, honestly, with integrity and to the highest ethical standards, and this commitment is embodied in the Company's Code of Conduct, Whistle Blower Policy and this Policy.
- 1.2 This Anti-Bribery & Corruption Policy reiterates the Company's commitment to comply with and to conduct its business in accordance with applicable anti-bribery & corruption laws, and to cause its subsidiaries, affiliates, Board of Directors, Executive Management Team, employees, consultant and agents to behave accordingly.
- 1.3 In furtherance of this commitment, the Company will unequivocally abide by *the Foreign Corrupt Practices Act (1977) ("FCPA")*, *the UK Bribery Act (2010) ("UKBA")* and laws countering bribery and corruption in all of the jurisdictions in which the Company operates or conducts its business.

1.4 It is important to remember that regardless of whether the country in which an act of bribery takes place has enacted anti-bribery laws which prohibit the relevant action, the FCPA/UKBA and similar statutes in other jurisdictions have extra-territorial application, in some cases even if such conduct is specifically permitted or condoned by the local laws of a particular jurisdiction. Although penalties may differ across the different jurisdictions in which the Company operates, bribery (or even the perception or an allegation of it):

1.4.1 can damage the Company's reputation; and/or

1.4.2 could cost the Company financially, not only in respect of potential fines and the time spent in dealing with such issues, but also may lead to serious penalties on individual members of the Company, including imprisonment and fines.

1.5 THE COMPANY IS COMMITTED TO:

1.5.1 upholding anti-bribery and anti-corruption laws that apply to the Company;

1.5.2 not offering bribes or condoning the offering of bribes on the Company's behalf;

1.5.3 making sure that the Company's Board of Directors, Executive Management Team, employees, consultants, agents and others with whom the Company deals are aware of and abide by the Company's values and policies;

1.5.4 avoiding doing business with or affiliating the Company with others who do not accept the Company's values and policies and who may harm the Company's reputation; and?

1.5.5 ongoing monitoring of and auditing compliance with these principles.

1.6 THE PURPOSE OF THIS POLICY IS TO:

1.6.1 set out RA's responsibilities, and of those working for, or with the Company in observing and upholding RA's position on bribery and corruption;

1.6.2 ensure that RA has adequate procedures in place to prevent and detect bribery and corruption;

1.6.3 provide information and guidance to those working for, or with RA on how to recognise and deal with potential bribery and corruption issues; and

1.6.4 protect RA against the possible penalties and repercussions resulting from the acts of bribery and corruption or being associated with such behavior.

2. To Whom Does this Policy Apply?

- 2.1 This policy applies to the Board of Directors, Executive Management Team, Managers, employees (whether permanent, fixed-term or temporary) of RA, wherever located, and reflects the standards to which the Company expects its business associates, partners, agents, contractors, technical and other consultants, agents, (known as **third party service providers**) or any other person associated with or acting on behalf of the Company (collectively referred to as "**Representatives**" in this policy).
- 2.1 Each Representative is expected to agree to be bound by the provisions of this Policy upon notification of the most recent copy being given to them or upon notification that an updated version has been placed on the Company's website or via the HR Management System for review.

3. Who is Responsible for the Policy?

- 3.1 The Board of Directors and Executive Management Team is ultimately responsible for this Policy and will ensure that it complies with the Company's legal and ethical obligations and for supervising the Compliance Manager on the administration of this policy.
- 3.2 The Compliance Manager has responsibility for monitoring the use and effectiveness of this policy and dealing with any queries on its interpretation. The members of the management team at all levels, as well as in the countries of operations, are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it. The Compliance Manager may delegate administrative tasks to subordinates or other officers as may be necessary for the purposes of this policy.

4. What is Bribery?

- 4.1 Bribery is the most common form of corruption and can be broadly defined as the offering, promising, giving, accepting or soliciting of an inducement or reward, loan, advantage or benefit of any kind to a person in a position of trust or power (including a "public official") to influence that person's views or conduct or to obtain an improper advantage.
- 4.2 An "**improper advantage**" is obtained where the Company is placed in a better position (financially, economically, or reputationally, or in any other way which is beneficial) either than its competitors or than it would otherwise have been had the bribery or corruption not taken place.
- 4.3 Although many people think of bribery as giving someone cash, it can take many other forms including the provision or acceptance of:
 - non-cash gifts;
 - lavish entertainment or hospitality;

- employment or "consulting" relationships of a Third Party or relative thereof;
 - loans;
 - kickbacks;
 - political contributions;
 - charitable contributions;
 - gifts, travel, hospitality, and reimbursement of expenses; or
 - other reward or benefit.
- 4.4 For example, bribery takes place if someone is given a gift, donation, loan, cash or non-cash incentive, benefit, or is taken out for particularly lavish hospitality and that in doing so the giver of such items has done so with the intention of inducing or rewarding someone to behave improperly or not to perform their function correctly or in good faith.
- 4.5 It is important to remember that it is irrelevant whether the bribe was accepted or not; merely offering the bribe will usually be sufficient for an offence to be committed.
- 4.6 In this policy, "**Third Party**" means any individual or organisation you come into contact with during the course of your work for or with the Company, and includes actual and potential, customers, suppliers, distributors, business contacts, joint venture partners, agents, advisers, government and public bodies, including their advisors, representatives and officials, politicians and political parties. A "**public official**" includes:
- 4.6.1 a person who holds a legislative, administrative or judicial position of any state;
 - 4.6.2 a person who performs public duties or functions for any state, including a person employed by a board, commission, corporation or other body or authority that is established to perform a duty or function on behalf of the foreign state, or is performing such a duty or function; and
 - 4.6.3 an official or agent of a public international organisation that is formed by two or more states or governments, or by two or more such public international organizations.

5. What is Not Permitted?

- 5.1 Bribery and corruption can take many forms and it is important to understand what is expected in this regard.
- 5.2 It is not permitted for you (or a Third Party acting on your behalf or with whom you have otherwise contracted or dealt with on behalf of the Company) to:
- 5.2.1 give, promise to give, or offer, a payment, loan, reward, gift or hospitality, to a public official with the expectation or hope that an

- improper business advantage will be received, or to reward an improper business advantage already given;
- 5.2.2 give, promise to give, or offer, a payment, loan, reward, gift or hospitality to a public official to "facilitate" or expedite a routine procedure performed by a government body or NGO (nongovernmental organisation);
 - 5.2.3 make or authorise cash or cash equivalent (e.g. cheque) reimbursements or payments of any kind to individual public officials without prior written authorisation from the Compliance Manager;
 - 5.2.4 threaten or retaliate against any person who has refused to commit a bribery offence or who has raised concerns under this policy;
 - 5.2.5 write a cheque to "cash" or "bearer";
 - 5.2.6 receive, or be promised or offered receipt of, a payment, loan, reward, gift or lavish hospitality from a Third Party seeking to obtain an improper business advantage, or to reward an improper business advantage previously given; or
 - 5.2.7 engage in any activity that might lead to a breach of this policy;

6. Facilitation Payments and Kickbacks

- 6.1 RA has a zero-tolerance approach to, and does not make, facilitation payments or "kickbacks" of any kind, regardless of whether such payments are permitted under applicable law.
- 6.2 Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official (such as the issuance of permits, licenses, processing visas or work permits, provision of mail pick-up and delivery etc.). Kickbacks are typically payments made in return for a business favor or advantage and can include discounts or other types of cash incentives.
- 6.3 All Representatives must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made by, on behalf of, or otherwise in connection with the business of or for the benefit of the Company.
- 6.4 If asked to make a payment on the Company's behalf, always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. Always obtain a receipt which details the reason for the payment and evidences that the payment went directly to the appropriate payee who provided the goods or services. Any suspicions, concerns or queries regarding a payment should be raised with the Compliance Manager.

7. Gifts and Hospitality

- 7.1 This policy does not prohibit normal, appropriate and modest hospitality to or from Third Parties. These customary courtesies are designed to build goodwill among business partners. You should, however, be mindful that RA does not permit any of its employees or affiliates to offer or accept gifts/or hospitality to, or receive same from, any foreign public official(s).
- 7.2 The practice of giving business gifts and taking part in corporate hospitality or undertaking speaking engagements varies between countries, regions and industries. What may be normal and acceptable in one may not be in another.
- 7.3 The test to be applied is whether in all the circumstances the gift or hospitality is reasonable, proportionate and justifiable (both from the perspective of the provider and recipient) rather than lavish and extraordinary; bearing in mind that what may normally be viewed as small or insignificant in some countries can be of significant value in another. The intention behind the gift should always be considered and nothing should be explicitly or implicitly expected, implied or demanded in return.
- 7.4 The giving of gifts and corporate hospitality or entertainment is not prohibited, if the following requirements are met:
 - 7.4.1 it is done in the normal course of the Company's business and without the intention of, or without a reasonable prospect of, influencing a Third Party to obtain or retain an improper business advantage, or to reward the provision or retention of an improper business advantage, or in explicit or implicit exchange for favors or benefits;
 - 7.4.2 it does not include cash or a cash equivalent;
 - 7.4.3 it must be properly recorded and disclosed on the relevant company forms (see RA Gifts & Hospitality policy), and not paid personally to avoid any approval or disclosure requirements;
 - 7.4.4 taking into account the reason for the gift or hospitality, it is of an appropriate type and value in the applicable country/region and given at an appropriate time;
 - 7.4.5 it is given openly and in the Company's name, not secretly;
 - 7.4.6 it is not given or received frequently between the same individuals; and
 - 7.4.7 gifts or hospitality should not be offered to public officials or government representatives, or politicians or political parties, without the prior approval of the CEO or guidance from the Compliance Manager.

8. Reimbursement of Travel Expenses

- 8.1 The reimbursement of any and all bona fide, reasonable travel and lodging expenses of a Foreign Public Official is expressly discouraged and all such costs should be borne directly by the Company, where relevant and applicable. Any such requirements should be broached with the Compliance Manager to ensure the risks involved in such a scenario are minimized or avoided. They should seek the Compliance Manager's prior advice before making any offer to such Foreign Public Official. In any such case, the amount and purpose of such reimbursement must be reasonable and must relate directly to either:
- 8.1.1 the promotion, demonstration, or explanation of the Company's products, services or operations with a government, government agency, or government-owned or government-controlled enterprise; or
 - 8.1.2 the execution or performance of a contract with a foreign state or related organisation.
- 8.2 RA will pay these travel and lodging expenses directly, if possible, rather than reimburse the Public Official, and it is advisable to notify the Foreign Public Official's employer that such expenses will be paid by the company.
- 8.3 Any such instances as outlined above should be recorded within the '*Record of Gifts & Hospitality*' form and submitted to the Compliance Manager as soon as is practicably possible after the event.

9. Charitable Contributions and Sponsorships

- 9.1 RA believes in contributing to the communities in which it does business via the Corporate Social Responsibility program.
- 9.2 In general, RA will not give monetary charitable contributions. In the rare occasions where money is given, it will be to a reputable charity or non-governmental organisation for a specific purpose. The decision to make a charitable contribution may only be made with consent from the CEO, CFO or COO.

10. Political Donations

- 10.1 RA does not make any political donations to government officials or agents, politicians or political parties. If an RA employee is asked to make a political donation, this must be reported to senior management. Similarly, if an RA associated person is asked to make a political donation, this request must be highlighted and reported to the RA contact immediately.
- 10.2 In undertaking any political activity that is not authorized by this policy or other policies of the Company, all Representatives will be deemed to be acting in their personal capacity or that of their own corporate organisation and not on behalf of the Company.

11. Retaining Third Parties:

Representatives shall not retain or engage any agent unless:

- 11.1 Adequate due diligence, where deemed required, will be carried out, either by the Company or by a reputable third party, and the reputation, background and past performance of the prospective agent are clearly documented;
- 11.2 Such agent has first been provided with a copy of this policy (in English or another appropriate language) and has acknowledged in writing that such agent understands and shall comply with this policy at all times.

12. Record-Keeping

- 12.1 The Company must keep financial records and have appropriate internal controls in place which will evidence the business reason for any payments made to Third Parties.
- 12.2 Representatives must ensure that all expense claims relating to hospitality, gifts, or expenses incurred are submitted in accordance with the Company's 'Business Travel & Expenses' policy and specifically record the reason for the expenditure.
- 12.3 All accounts, invoices, and other similar documents and records relating to dealings with Third Parties should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

13. Raising Concerns

- 13.1 If you have concerns about any issue or suspicion of malpractice, even at an early stage, you must report them to your Line Manager, Compliance Manager or a member of the Senior Management in Dubai. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with the Compliance Manager.
- 13.2 You must advise your Line Manager and, in turn, the Compliance Manager as soon as possible if you or another Representative are offered a bribe by a Third Party or are asked to make one.
- 13.3 It is important that you advise the Compliance Manager as soon as possible if you suspect that you or another Representative may be offered a bribe by a Third Party or are asked to make one in the future, or believe that you or another Representative are a victim of another form of unlawful activity when acting on behalf of, or in association with the Company.
- 13.4 Alternatively, you can submit a report to the RA whistleblowing web page (Ethics point) via <https://raints.whistlelink.com/>.

14. Protection

- 14.1 Representatives who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions or acts of retaliation. The Company encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 14.2 The Company is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally with the Chief Executive Officer. Alternatively, concerns may also be raised through the Company's confidential ethics reporting processes outlined in its Code of Conduct and its Whistle Blower Policy.

15. Your Responsibilities

- 15.1 All employees and Representatives must ensure that they have read, understood and comply with this policy.
- 15.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all employees and Representatives. All employees and Representatives are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 15.3 You must notify the Compliance Manager as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future. 'Red flags' that may indicate bribery or corruption are set out in Schedule A hetero.
- 15.4 Any employee, manager, member of the Executive Management Team or member of the Board of Directors of the Company who breaches this policy will face disciplinary action. Any employee, manager, member of the Executive Management Team or member of the Board of Directors of the Company who has direct knowledge of potential violations of this policy but fails to report such potential violations to the Company Compliance Manager, will be subject to disciplinary action. Any employee, manager, member of the Executive Management Team or member of the Board of Directors who misleads or hinders in investigators inquiring into potential violations of this policy, will be subject to disciplinary action. In all cases, the disciplinary action may result in dismissal.



15.5 Any third-party agent who breaches the terms of this policy, who knows of and fails to report to the Company’s Compliance Manager potential violations of this policy, or who misleads investigators making inquiries into potential violations of this policy, may have their contracts re-evaluated or terminated.


16. Training

16.1 Training on this policy forms part of the induction process for all new employees, officers and directors. All employees and managers will receive regular, relevant training on how to implement and adhere to this policy. All Representatives will be informed whenever significant changes are made to this policy.

17. Monitoring and Review

17.1 The Compliance Manager will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

17.2 All Representatives are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.



Soraya Narfeldt
CEO

Policy Implementation/ Review Date	Next Policy Review Date
April-2025	January-2026

Schedule A: Potential Risk Scenarios: "Red Flags"

1. The following is a list of possible red flags that may arise during the course of any representative working for, on behalf of RA, and which may raise concerns under various anti-bribery & corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only. If you encounter any of these red flags you must promptly report them to the Compliance Manager or, alternatively, via the Company's confidential ethics reporting processes outlined in its Code of Conduct and its Whistle Blower Policy:
 - 1.1. you become aware that a Third Party has a poor reputation and/or engages in, or has been accused of engaging in, improper business practices;
 - 1.2. you learn that a Third Party has a reputation for paying bribes, or requiring that bribes are paid to them;
 - 1.3. A Third Party:
 - 1.3.1. insists on receiving a commission or fee payment before committing to sign a contract with the Company, or carrying out a government function or process for the Company;
 - 1.3.2. requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
 - 1.3.3. requests that payment is made to a country or geographic location different from where the Third Party resides or conducts business;
 - 1.3.4. requests an unexpected additional fee or commission to "facilitate" a service;
 - 1.3.5. demands lavish entertainment or gifts before commencing or continuing negotiations or discussions on a matter;
 - 1.3.6. requests that a payment is made to "overlook" potential legal violations;
 - 1.3.7. requests that you provide employment or some other advantage to a friend or relative;
 - 1.3.8. requests that you enter into a contract; or
 - 1.3.9. has unexplained preferences for certain sub-contractors;
 - 1.4. you learn that a colleague has been taking out a particular government official for very expensive and frequent meals;
 - 1.5. you receive an invoice from a Third Party that appears to be non- standard or customised;
 - 1.6. you notice that the Company has been invoiced for a commission or fee payment that appears large or small given the service stated to have been provided;
 - 1.7. you notice the establishment of unusual or unexplained bank accounts or funds;

- 1.8. the country in question is known for bribery or there have been regular media reports of bribery in such country; or
- 1.9. a Third Party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to the Company.