

Anti-Bribery Policy

Policy Statement

Bribery is the practise of offering or receiving an incentive, to gain a reward or as an advantage. A bribe can take on a variety of forms and can include cash, gifts, hospitality, a contract award, or gaining inside information about future work. Bribes are given to a person with the intention of influencing the person to act in a way that favours an individual or company.

Raw Telecom Ltd has a zero tolerance for bribery and corrupt activities. As an organisation, we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, and do not tolerate any form of bribery in its business.

Under the UK Bribery Act 2010, it is illegal to:

- Offer a bribe
- Agree to offer a bribe
- Accept a bribe
- Agree to accept a bribe
- Request a bribe
- Bribe a foreign public official
- Fails to prevent bribery in a commercial organisation

Responsibility

Raw Telecom Ltd.'s Managing Directors have overall accountability for managing the risk of bribery, ensuring this policy complies with our legal obligations, and that all those under our control comply with it.

Employees of Raw Telecom Ltd should not offer, make, ask for, accept a payment, gift or favour in return for favourable treatment, or to gain business advantage.

Scope

This policy applies to all employees that work or on behalf of Raw Telecom Ltd. This includes, but is not limited to:

- Employees
- Contractors
- Consultants
- Suppliers
- Third parties

Anyone working on our behalf, or in our name, through outsourcing of services, processes, or any business activity, will be required to act consistently with this policy when acting on our behalf.

Bribery Breaches

Bribery is a criminal offence under the UK Bribery Act 2010. Raw Telecom Ltd will investigate any actual or suspected breach of this policy.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

A breach of this legislation is likely to result in criminal proceedings and possible imprisonment for the perpetrator.

Facilitating payments and kickbacks

Raw Telecom Ltd will not accept, facilitation payments or kickbacks of any kind. Facilitation payments are typically small, unofficial payments offered to secure or expedite an action. All employees must avoid any activity that might lead to a facilitation payment or kickback.

Gifts, hospitality and expenses

Raw Telecom Ltd accepts normal and appropriate gestures of hospitality and goodwill, so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given.
- It is not made with the suggestion that a return favour is expected.
- It is compliant with local law.



- It is given in the name of the company, not in an individual's name.
- It is appropriate for the circumstances (small gift at Christmas).
- It is given or received openly and not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value, as predetermined by the company's compliance office.
- It is not offered to or acceptance from a government official or representative or politician or political party without prior approval of the company's Compliance Officer.

Where it is inappropriate to decline the offer of a gift, the gift may be accepted if it is declared to the Company Directors who will assess the circumstances. As good practice, gifts given and received should always be disclosed to the Company Directors. Gifts from suppliers should always be disclosed. The intention behind a gift being given or received should always be considered. Any uncertainty, then the advice of the Company Directors should be sought.

Donations

We do not usually make contributions to any political parties. We only make charitable donations that are legal and ethical under local laws and practices.

Reporting a Bribe

The prevention, detection and reporting of bribery is everyone's responsibility. If an employee has been offered a bribe or received an inappropriate request from someone we do business with:

- Do not accept the bribe and decline the request.
- Inform your line manager that you think you may have been offered a bribe.
- Report the incident to the Company Directors

