



ANTI-CORRUPTION & ANTI-BRIBERY POLICY

Roshal Space Consultants Ltd has a clear anti-corruption & anti-bribery policy and we fully support our employees to make decisions in line with our policy. Our corporate conduct is based on our commitment to acting professionally; fairly with integrity and has a zero-tolerance to any form of bribery or corruption. This policy applies to all Roshal employees (staff, contract and temporary) and extends to all our business dealings and transactions. We also encourage the adoption of this policy amongst our business partners including contractors, suppliers and customers.

POLICY

Roshal Space Consultants Ltd will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regard to our conduct both at home and abroad. We recognise that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. Notwithstanding, our business ethics and integrity ensure that we exclude and prevent any form of bribery or corruption from our business activities, in whatever shape or form, and at all times we maintain a position which is fully compliant with our legal responsibilities.

Roshal Space Consultants Ltd does not engage in bribery or any form of unethical inducement or payment including facilitation payments and 'kickbacks.' All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Company.

Employees have strict guidelines regarding hospitality and gifts accepted or offered, which are subject to managerial review. Roshal does not make direct or indirect contributions to political parties.

Roshal Space Consultants Ltd will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to managerial review.

BRIBERY

- Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.
- A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.
- Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the Commercial Manager or the senior management team.

THE FOLLOWING IS NOT ACCEPTABLE

- **Gifts and hospitality**

Roshal Space Consultants Ltd accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) 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, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (i.e. a voucher or gift certificate).
- It is appropriate for the circumstances (i.e. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type/value and given at an appropriate time, taking into account the reason for the gift.
- It is given/received openly, 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 (in excess of £100).
- It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's compliance manager.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared and the circumstances assessed.

Roshal Space Consultants Ltd recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each. Gifts given and received should always be disclosed to the Commercial Manager/Senior Management team. The intention behind a gift being given/received should always be considered. If there is any uncertainty, advice should be sought.

- **Facilitation payments and kickbacks** - does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.
- **Political contributions** – We will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.
- **Charitable contributions** - accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes. Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery. Roshal Space Consultants Ltd will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without approval.



TRAINING AND COMMUNICATIONS

This policy and relevant guidance will be communicated to employees across the company through our established internal communication channels. All employees are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy. We will also communicate this policy to our suppliers, contractors and business partners and wider stakeholders.

RAISING CONCERNS AND SEEKING GUIDANCE

Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage to the Commercial manager or the senior management team.

MONITORING AND REVIEW

Roshal Space Consultants Ltd will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.

Signed:

A handwritten signature in black ink, appearing to read "CP", written over a light grey horizontal line.

Craig Parsons
Managing Director
Roshal Space Consultants Ltd

Date: 14th April 2021