



# HUMAN RESOURCES POLICY

## ROCKSURE INTERNATIONAL LTD

NO. 4 ADDIS ABABA STREET

East Legon.

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<b>POLICY NAME</b>	ANTI-BRIBERY AND ANTI-CORRUPTION			<b>POLICY NO.</b>	
<b>EFFECTIVE DATE</b>	MARCH 2021	<b>DATE OF LAST REVISION</b>		<b>VERSION NO.</b>	
<b>ADMINISTRATOR RESPONSIBLE</b>	HUMAN RESOURCES DEPARTMENT		<b>CONTACT INFORMATION</b>		
<b>APPLIES TO</b> Apply group names to define applicable areas of staff.					
GROUP 1	ALL ROCKSURE STAFF	GROUP 2	RIL SUPPLIERS	GROUP 3	
GROUP 4		GROUP 5		GROUP 6	

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR

### ITEM 1.0 APPROVAL AND REVIEW

### ITEM 2.0 ADDITIONAL NOTES

### ITEM 3.0 SCOPE

Describe to what and to whom this policy applies.

The policy applies to employees and contractors irrespective of their geographical location when undertaking company business.

## ITEM 4.0 POLICY STATEMENT

Describe the policy and the reason for the policy.

4.1 RIL takes a zero-tolerance approach to bribery and corruption and therefore entreats that all official duties of RIL must be conducted in an ethical, honest and legal manner.

4.2 RIL employees are expected at all times to conduct themselves professionally, fairly and with high integrity which reflects the company's values at all times no matter the contrary practices elsewhere.

4.3 RIL is committed to abiding by all laws relevant to countering bribery and corruption in all its areas of operation.

This policy is to make every employee and contractors aware of the uncompromising position of Rocksure International Limited (RIL) in relation to bribery and corruption. The company considers bribery and corruption as a criminal offence which is unacceptable and unethical and are inconsistent with our values.

## ITEM 5.0 TERMS AND DEFINITIONS

Define any acronyms, jargon, or terms that might have multiple meanings.

TERM	DEFINITION
Bribery	Bribery is defined generally as corrupt solicitation, acceptance, or transfer of value in exchange for official action.
Corruption	Corruption is a form of dishonesty or a criminal offense which is undertaken by a person or an organization which is entrusted in a position of authority, in order to acquire illicit benefits or abuse power for one's personal gain
Ethical	Pertaining to or dealing with morals or the principles of morality; pertaining to right and wrong in conduct. Being in accordance with the rules or standards for right conduct or practice, especially the standards of a profession
Legal	Permitted by law, of or relating to law; connected with the law or its administration.
Law	The principles and regulations established in a community by some authority and applicable to its people, whether in the form of legislation or of custom and policies recognized and enforced by judicial decision.

## ITEM 6.0 POLICY SECTIONS

All employees are expected to understand and comply with the policy and applicable laws in business dealings throughout the company's operations.

### ITEM 6.1 GUIDELINES

All employees are expected to understand and comply with the policy and applicable laws in business dealings throughout the company's operations.

6.1.1 No individual must be involved in any activities which could be perceived or constitute bribery or corruption

6.1.2 All official duties must be accurately recorded when transacting official work.

6.1.3 Any individual involved in corrupt activity which has a rippling effect on the image of the company, such perpetrators of the illegal activities business will face disciplinary sanctions.

- 6.1.4 A whistle blowing mechanism and policy will be enforced to afford individuals to anonymously report any potential bribery or corruption activities.
- 6.1.5 All reported incidents on bribery and corruption must be promptly and thoroughly investigated and dealt with appropriately.

**6.2 NON-COMPLIANCE**

Breaches to this policy are treated as serious misconduct and those found not following the standards set shall be dealt with accordingly including disciplinary action.

**ITEM 7.0 EXCEPTIONS**

Describe exceptions here.

N/A

**ITEM 8.0 RELATED POLICIES AND OTHER REFERENCES**

**ITEM 9.0 ROLES AND RESPONSIBILITIES**

List the job titles and business offices directly responsible for the policy.

ROLE	RESPONSIBILITY
9.1 HR Officer	<p><b>9.1.1 Training and Education:</b> HR officers may help organize training sessions and educational programs to ensure that employees understand the organization's policies regarding anti-bribery and anti-corruption.</p> <p><b>9.1.2 Policy Communication:</b> HR officers assist in disseminating the organization's anti-bribery and anti-corruption policies to all employees.</p> <p><b>9.1.3 Reporting Mechanisms:</b> HR officers might be involved in establishing mechanisms for employees to report potential bribery or corruption incidents confidentially.</p>
9.2 HR Manager	<p><b>9.2.1 Policy Development:</b> HR managers collaborate with legal and compliance teams to develop comprehensive anti-bribery and anti-corruption policies that align with legal requirements and industry best practices.</p>

	<p><b>9.2.2 Leadership Training:</b> HR managers may provide specialized training for executives and leaders to ensure they understand their responsibilities in preventing bribery and corruption, including setting an example for ethical behavior.</p>
<p><b>9.3</b> Line Manager</p>	<p>9.3.1 Line managers should demonstrate ethical behavior and adherence to anti-bribery and anti-corruption policies.</p> <p>9.3.2 Line managers should be vigilant in identifying situations that could potentially lead to bribery or corruption. They report these concerns to the appropriate channels within the organization.</p> <p>9.3.3 Line managers should ensure that their team members understand the organization's policies and know how to handle situations that could involve bribery or corruption.</p>
<p>9.4 Directors</p>	<p>9.4.1 Directors should oversee the organization's anti-bribery and anti-corruption efforts.</p> <p>9.4.2 Directors should identify and manage potential bribery and corruption risks at a strategic level.</p> <p>9.4.3 Directors communicate the organization's commitment to anti-bribery and anti-corruption efforts to stakeholders, including shareholders, investors, and regulatory bodies.</p> <p>9.4.4 Directors ensure that there are mechanisms in place to protect whistleblowers who report incidents of bribery or corruption.</p>
<p>9.5 PIU</p>	<p>9.5.1 Developing and implementing comprehensive anti-bribery and anti-corruption policies.</p> <p>9.5.2 Conducting regular risk assessments to identify vulnerabilities.</p> <p>9.5.3 Establishing reporting mechanisms for suspected violations.</p> <p>9.5.4 Investigating reported incidents thoroughly and taking appropriate action.</p> <p>9.5.5 Providing ongoing training to employees on anti-bribery and anti-corruption policies.</p> <p>9.5.6 Regularly reviewing and updating policies to stay in line with changing regulations.</p> <p>9.5.7 Collaborating with legal and regulatory bodies to ensure compliance.</p>

**ITEM 10.0 CONTACTS**

List contacts in the table.

SUBJECT	CONTACT		PHONE	EMAIL