

Anti-Bribery Policy

Purpose

RAW Technology Ltd and its subsidiaries value their reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the company's staff as well as others acting on the company's behalf are key to maintaining these standards.

The purpose of this Anti-Bribery Policy is to set out the company's policy in relation to bribery and corruption and to serve as a guide for all employees. It explains the steps needed to be followed in order to ensure that the company maintains its values, adheres to corporate responsibility and meets legal expectations.

Understanding and recognising bribery and corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider dishonest in the circumstances.

Bribery can be defined as offering, promising or giving (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

Penalties

Under the Bribery Act 2010 in the UK and the Prevention of Corruption Act (as amended) in Republic of Ireland, bribery by individuals is punishable by up to 10 years' imprisonment and/or and unlimited fine. If the company is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could face an unlimited fine. Other penalties may apply in other jurisdictions.

Policy

You must not, directly or indirectly offer, a bribe, or accept any bribe either in cash or any other form of inducement, to or from any person or company, wherever they are located and whether they are a public official or body or private person or company.

You must not, directly or indirectly gain any commercial, contractual or regulatory advantage for the company in a way which is unethical.

You must not give or accept gifts or hospitality from any supplier, potential supplier or customer without obtaining prior approval from the director heading your division (in the case of directors, approval should be obtained from the Managing Director/Chief Operating Officer of the relevant RAW company).

Responsibility

This policy is applicable to all employees of RAW Technology Ltd .

The ultimate responsibility for compliance of this policy rests with the Managing Director of RAW Technology Ltd and Chief Operating Officer of RAW Group.

In order to make an assessment of any particular gift or hospitality event you will need to supply RAW Technology Ltds Human Resources Manager with relevant information. This will include the cost and nature of the gift/hospitality and the details of the person/company providing it. Human Resources will then obtain authorisation on your behalf and will inform you of the outcome. Please note no gifts or hospitality should be accepted until authorisation has been received.

You should not be prohibited from carrying out your work provided the activities are customary and appropriate. For example acceptable activities may include:

- Normal hospitality
- Carrying out proportionate and reasonable promotional activities.

Adherence

All incidents, risks and issues which are contrary to this policy should be reported confidentially to the Human Resources Manager. RAW Technology Ltd will investigate seriously any actual or suspected breach of this policy. Employees found in breach may be subject to disciplinary action which could ultimately result in their dismissal. In the case of third parties found to be bribing or attempting to bribe company employees, directors, suppliers or customers they will be informed in writing that business dealings will be ceased and appropriate authorities will be informed.

Signed on behalf of the RAW Technology Ltd:



Position: Managing Director
RAW Technology Limited

Date: May 2016