

POLICY DOCUMENT

Anti-Bribery and Corruption Policy

RECOM CORP International (RCI) is committed to conducting its business fairly, honestly and with integrity in every country where we operate. We adopt a zero-tolerance approach to bribery and corruption in all forms.

Our Commitment

RCI complies with all applicable anti-bribery and anti-corruption laws, including the UK Bribery Act, the U.S. Foreign Corrupt Practices Act (FCPA) and the domestic laws of every jurisdiction where we operate. We will not offer, promise, give, solicit or accept any bribe or improper advantage, whether directly or through third parties.

Scope

This policy applies to all directors, officers, employees, contractors, consultants, agents, joint-venture partners, suppliers and any other party acting for or on behalf of RCI.

What is Prohibited

The following conduct is strictly prohibited under this policy:

- Offering, giving, requesting or accepting any bribe, kickback or facilitation payment
- Using company funds or assets for any unlawful, improper or unethical purpose
- Providing gifts, hospitality or entertainment intended to improperly influence a decision
- Making political or charitable contributions to secure a business advantage
- Engaging third parties to do anything that RCI personnel are themselves prohibited from doing

Gifts and Hospitality

Modest, occasional and transparent gifts and hospitality may be acceptable where they are lawful, reasonable in value, not intended to influence a decision, and fully disclosed in accordance with our internal procedures.

Reporting Concerns

All employees and stakeholders are encouraged to report suspected breaches of this policy through our confidential whistleblowing channels. RCI prohibits retaliation of any kind against those who report concerns in good faith.