

# Anti-Bribery and Anti-Corruption Policy

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## Contents

1. Purpose.....	3
2. Scope.....	3
3. Definitions.....	3
4. Prevention of Bribery and Corruption .....	4
5. Guidelines for Gifts.....	4
6. Guidelines for Political Contributions .....	4
7. Guidelines for Charitable Contributions or Sponsorship .....	5
8. Training for Anti-Bribery and Anti-Corruption .....	5
9. Procedures for Handling Breaches.....	5
a. Speak to your supervisor.....	5
b. Use the anonymous whistleblowing channel.....	5
c. Report to appropriate authorities (exceptional cases).....	6
10. Protection for whistleblowers .....	6
11. Corrective or Disciplinary Actions.....	6
12. Highest Endorsing Decision-Making Body.....	7

## 1. Purpose

RAK Properties, hereinafter referred to as (RAKP), is committed to conducting all its business dealings and relationships in a professional, fair, and transparent manner with utmost integrity. This includes full compliance with all applicable laws and legal standards.

The purpose of the **Anti-Bribery and Anti-Corruption (ABAC) Policy** is to uphold this commitment and provide guidance and set procedures to prevent, detect, and respond to any form of bribery or corrupt conduct.

RAKP prohibits all forms of bribery and corruption and expects all members to refrain from engaging in or facilitating such conduct. They are also expected to report any suspected or actual breaches of this Policy, for which appropriate channels will be provided.

## 2. Scope

This policy applies to all RAKP entities and personnel (including directors, shareholders, executives, employees, contractors, consultants, and interns) regardless of the team they work in or which office they work in. This policy also relates to any actions or concerns related to RAKP's Contractors, suppliers, customers, or any other third party with whom RAKP has dealings.

## 3. Definitions

- (a) **Bribery:** it includes the offer, promise, giving, demand or acceptance of an undue advantage as an inducement for an action which is illegal, unethical or a breach of trust. It includes advantages provided directly, as well as indirectly through an intermediary.
- (b) **Corruption:** It includes wrongdoing on the part of an authority, or those in power, through means that are illegitimate, immoral, or incompatible with ethical standards. It is usually designed to obtain financial benefits or other personal gain.
- (c) **Gift:** Any item of value, including money, goods, services, hospitality, or entertainment, given or received as a gesture of appreciation or goodwill, rather than as a legitimate business expense.
- (d) **Hospitality:** The provision of meals, accommodation, travel, entertainment, or other benefits in connection with business activities.
- (e) **Public Official:** Any person holding a legislative, administrative, or judicial position of any kind, whether appointed or elected, in a country or territory. This includes

employees of government-owned or controlled entities, international organisations, and political candidates.

- (f) **Third Party:** Any individual or organization that is not a direct employee of RAKP but acts on its behalf, including agents, consultants, contractors, suppliers, and joint venture partners.
- (g) **Political Contribution:** Any donation or support, whether financial or in-kind, made to a political party, candidate, or campaign.
- (h) **Charitable Contribution:** Any donation or sponsorship provided to a charity, non-profit organisation, or similar entity, whether in cash or in-kind.
- (i) **Whistleblower:** Any person who reports suspected wrongdoing, including bribery or corruption, in good faith through the appropriate channels.

#### 4. **Prevention of Bribery and Corruption**

RAKP adopts a zero-tolerance approach to all forms of bribery and corruption. All members acting on behalf of RAKP are strictly prohibited from offering, giving, soliciting, or accepting any bribe or improper advantage, whether directly or indirectly, in connection with RAKP's business. This prohibition applies to interactions with both public and private parties.

#### 5. **Guidelines for Gifts**

Gifts may be acceptable if they are reasonable, made in good faith, and not intended to influence any business decisions or gain an improper advantage. Any gift or hospitality that could reasonably be perceived as a bribe or create a conflict of interest shall be declined.

All gifts and hospitality received must be transparently recorded and reported to the Compliance Department in accordance with company procedures.

#### 6. **Guidelines for Political Contributions**

The use of company funds or resources for political contributions, whether direct or indirect, is strictly prohibited unless expressly approved in advance by the Board of Directors and in full compliance with all applicable laws.

Employees must not make political donations or offer support to politically exposed entities on behalf of the company without proper authorisation. Any permitted political contributions must be fully documented and disclosed in the company's records

## 7. Guidelines for Charitable Contributions or Sponsorship

It is never permissible to undertake charitable donations and sponsorships unless they are lawful, transparent, and not used to gain improper business advantage.

All proposed charitable contributions and sponsorships must undergo due diligence to ensure the recipient is legitimate and unconnected to any public official or to any business decision.

All such contributions or sponsorships shall be properly documented and approved by the Compliance Department. They shall not be made for favourable treatment.

## 8. Training for Anti-Bribery and Anti-Corruption

RAKP shall ensure that all employees receive regular training on the requirements of this Policy and applicable laws. Training will be provided first at the induction and on an annual basis afterward.

Completion of training will be overseen by the Compliance Department, and failure to complete mandatory training may result in disciplinary action.

## 9. Procedures for Handling Breaches

Any employee or third party who suspects or becomes aware of a potential breach of this policy must report it immediately to the Compliance Department. All reports will be investigated promptly and confidentially.

### a. Speak to your supervisor

The first and preferred method for raising concerns is to speak to your direct supervisor. Send an email asking for a meeting and raise the issue there.

If the whistleblower wishes to remain anonymous or is concerned that their supervisor is somehow involved in the concerning activity or their response is insufficient, you may raise the concerns with a member of RAKP that you believe should be aware of the issue.

### b. Use the anonymous whistleblowing channel

In the case that you wish to remain anonymous, the next option is to use the FaceUp Whistleblowing System (<https://faceup.com/c/vtrlagiw>), simply enter the company code: UDgWmD6ZqJ. Choose the category of concern and give any details that you think are necessary to understand the issue.

Once you submit the report, you will receive a case code. You can log back into Faceup at any time and track the progress of your report. This case code is also useful for another reason. If the person who received your report needs more information, they can reach out and ask more questions while your anonymity remains protected.

**c. Report to appropriate authorities (exceptional cases)**

Finally, RAKP acknowledges that there may be extreme circumstances where it is necessary to consult an external third party, such as a regulator or the police. RAKP strongly encourages you to seek out guidance and advice before going to a third party.

## **10. Protection for whistleblowers**

RAKP will take appropriate measures to protect the whistleblower's identity and shield them from retaliation of any kind for stepping forward.

Harassment, discrimination or retaliation against the whistleblower will not be tolerated. Any form of retaliation will be seen as grounds for disciplinary action or dismissal.

## **11. Corrective or Disciplinary Actions**

Violation of the ABAC Policy will be viewed extremely seriously and shall result in disciplinary actions, up to and including termination of employment, and referral to the appropriate authorities for criminal prosecution. RAKP will also terminate its relationship with any third party found to have breached this policy.

**a. Breaches of this policy may lead to:**

- Formal warnings
- Suspension or termination of employment
- Legal action and/or referral to law enforcement

**b. Third Parties**

Third parties or vendors found violating this policy may have their contracts terminated and be excluded from future business dealings.

**c. Remediation**

Where breaches have occurred, corrective actions may include:

- Internal control enhancements

- Additional training
- Process changes

## **12. Highest Endorsing Decision-Making Body**

The Board of Directors of RAKP is the highest authority responsible for the approval, oversight, and periodic review of this policy.