

## ANTI-CORRUPTION POLICY STATEMENT

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## ANTI-CORRUPTION POLICY STATEMENT

It is ROGLP's policy to conduct all of its business in an ethical and honest manner. At all times ROGLP expects its personnel, management and representatives to comply with all applicable laws and regulations, in the countries in which we operate. This policy will also apply to consultants, agents and contractors who represent ROGLP.

In particular the US Foreign Corrupt Practices Act (FCPA) must be followed by ROGLP staff and representatives, and the UK Bribery Act (UKBA). The company's intent is to avoid corruption of all kinds. This includes bribery of government officials, including making facilitation payments for example to customs officials. The UKBA also makes it illegal to receive bribes. The FCPA also covers the giving of gifts, meals and entertainment to government officials. The FCPA requires detailed record keeping and reporting requirements. Any instances, where these activities may be an issue, must be reported to the ROGLP President before any action is taken.

Violation of anti-corruption laws can result in significant civil and criminal penalties and will result in disciplinary action. ROGLP personnel and representatives should be aware of the FCPA and UKBA requirements, and be alert for red flags, such as transactions that might appear to circumvent local laws. It is important that everyone understand the importance of this policy and comply with it, reporting any incident or questionable action or request that might violate this policy, to the ROGLP President immediately.

Signed by:

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Andy Garnett  
President