



CODE OF CONDUCT POLICY

Introduction

As an employee of RA, you are required to abide by the organization’s policies and procedures, the terms and conditions of your employment (as outlined in your employment contract), and to ensure your conduct is in keeping with the organization’s values, beliefs and aims. Whilst working for RA you represent the company at all times both during and after working hours when on company business. Standards are outlined below however personal standards such as dress, hygiene, cleanliness and presentation always make first impressions for both you and RA. Our desire to employ you with the company is a small indicator of our intent. We would expect the same from you and that you are justifiably proud to be associated with RA.

The Code of Conduct provides guidance regarding key issues that you need to be aware of as an employee, and outlines the professional standards and behaviors you are required to adopt whilst in the employment of RA. The Code applies to all employees equally throughout all levels within the organization. In accepting employment, you undertake to discharge your duties and to regulate your behavior and conduct in line with the requirements of this Code. The Code is designed for your guidance and protection. It is important to note that a breach of this code will result in disciplinary action including dismissal and criminal prosecution where necessary.

Whilst recognizing that local laws and cultures differ considerably from one country to another, the Code of Conduct is based on Legal standards found across the world, as well as being written to reflect the organization’s fundamental beliefs and values (as outlined below). Whatever country RA operates in, all employees are expected to be aware of the different cultural aspects of the country they are in and exercise good judgment and respect at all times.

RA

<p><b>Diversity/Equality</b></p>	<p>Our beliefs on equality are also relevant to our ways of working. These policies relate to the way that we treat, work with and value those with a different culture. We recognize that people should be treated with respect, have something positive to offer and have an equal right to fair employment opportunities and access to resources and opportunities.</p>
<p><b>Anti-Harassment</b></p>	<p>We view all forms of harassment as incompatible with our aims and beliefs for the dignity of all people and undermining to our vision of equal opportunities. We will not tolerate the harassment of any employee, contractors, partners, clients or any others.</p>

CODE OF CONDUCT - STANDARDS

As an employee of RA, I will:

1. Be responsible for the use of information and resources to which I have access by reason of my employment with RA.
  - 1.1.

2. Ensure the safety, health and welfare of all RA employees and contractors.
  - 2.1. I will adhere to all legal and organizational health and safety requirements in force at the location of my work.
  - 2.2. I will comply with all local security guidelines as stipulated by RA.
  - 2.3. I will avoid any unnecessary risk to the safety, health and welfare of myself and others, including contractors, partners, clients and others.
3. Ensure that my personal and professional conduct is, and is seen to be, of the highest standards and in keeping with RA's beliefs, values and aims.
  - 3.1. I will treat all people fairly, with respect and dignity.
  - 3.2. When working or travelling internationally on behalf of RA, I will observe all local laws and be sensitive to local customs.
  - 3.3. I will not work under the influence of alcohol or use, or be in possession of, illegal substances on RA premises or accommodation.
  - 3.4. I will seek to ensure that my sexual conduct does not bring RA into disrepute and does not impact on or undermine my ability to undertake the role for which I am employed.
  - 3.5. I will not enter into commercial sex transactions. For the purpose of this Code of Conduct a transaction is classed as any exchange of money, goods, services or favors with any other person.
4. Perform my duties and conduct my private life in a manner that avoids possible conflicts of interest with the work of RA and my work as an employee of the organization.
  - 4.1. I will declare any financial, personal, family (or close intimate relationship) interest in matters of official business which may impact on the work of RA – e.g. contract for goods/services, employment or promotion within RA, contractors, suppliers, civil authorities including government bodies.
  - 4.2. I will declare any interest of placing company business with a firm owned or controlled by RA employee or his or her family.
  - 4.3. I will not serve as a board member for an outside commercial company or organization which may impact RA's reputation.
  - 4.4. I will behave in a manner that does not undermine national or international perceptions of RA's impartiality.
  - 4.5. I will seek permission before agreeing to being nominated as a prospective candidate or another official role for any political party.
  - 4.6. I will not accept any additional employment or consultancy work outside of RA without prior permission from management.
  - 4.7. I will not accept any gifts, discounts, favors or services of any value or any remuneration from governments, competitors, suppliers and other persons, which have been offered to me as a result of my employment with RA. Prior to acceptance of any gift/remuneration I will first notify my manager and seek permission.

- 4.8. I will not own or have a substantial interest in a competitor, supplier or contractor associated with RA.
- 4.9. I will not abuse my position as an RA employee by requesting any service or favor from others in return for assistance by RA.
5. I will ensure that, as an RA employee, I will not contravene or breach any of the Articles covering Anti-Bribery & Corruption named in, but not restricted to, the policies as stated below:
  - 5.1. Child Forced Labor Policy
  - 5.2. Anti-Slavery Human Trafficking Policy
  - 5.3. The RA Employee Handbook
  - 5.4. Whistleblowing Policy
  - 5.5. Anti- Bribery & Corruption Policy
  - 5.6. Anti- Facilitation of Tax Evasion Policy
6. Avoid involvement in any criminal activities, activities that contravene human rights or those that compromise the work of RA.
  - 6.1. I will contribute to combating all forms of illegal activities
  - 6.2. I will notify RA of any unspent criminal/civil convictions or charges prior to employment.
  - 6.3. I will also notify the organization if I face any criminal charges during my employment.
  - 6.4. I will not engage in sexual behavior with persons under the age of 18, regardless of local custom.
  - 6.5. I will not abuse or exploit children or any other vulnerable persons in any way and will report any such behavior of others immediately to HR/Security.
7. Refrain from any form of harassment, discrimination, physical or verbal abuse, violence, intimidation or exploitation.
  - 7.1. I will fully abide with the requirements of RA's equal opportunities, diversity and anti-harassment policies in addition to any other relevant policies and procedures.
  - 7.2. I will never engage in any exploitative, abusive or corrupt relationships

## 8. Personal relationships

This element of the code of conduct applies to all staff of RA. It provides guidance in areas where personal relationships overlap with working relationships and is intended to ensure that employees do not act with impropriety, bias, abuse of authority or conflict of interest and do not lay themselves open to allegations of such conduct.

RA recognises the importance of preserving the integrity of professional relationships between members of staff, consultants, contractors and suppliers. In order that business is conducted (and perceived to be conducted) in a professional and proper manner it is necessary to distinguish between, and take account of, personal relationships, which overlap with professional ones.

In the context of this statement, a personal relationship is defined as any involvement of a romantic or sexual nature, between two consenting adults.

Staff should declare to their Head of Department or their Director any personal relationships with other members of staff, a consultant, contractor or supplier, which may give rise to a real or perceived conflict of interest, trust or breach of confidentiality. Members of staff who are in a line management or supervisory role should not be involved in:

- 8.1. The recruitment, selection, or appointment of any applicant with whom they have a personal relationship.
- 8.2. The appraisal, promotion, discipline or any other management activity or process involving a member of staff with whom they have a personal relationship.
- 8.3. The authorisation of any financial payments e.g. timesheets, expense claims, salary changes, allocation of external funding, for a member of staff with whom they have a personal relationship.

Additionally, staff in a personal relationship should not work together in any circumstance whereby a conflict of interest, breach of confidentiality or unfair advantage may be perceived to be gained, from the overlap of a personal and professional relationship.

Contracts to suppliers must be awarded on merit, by fair competition against other submissions and no special favour must be shown to businesses run by friends, partners, and relatives

Any employee who does not adhere to this statement may be subject to disciplinary action. Any action taken against employees in breach of the Personal Relationship element of the code of conduct will be in accordance with the Company's disciplinary procedure.

## APPLICATION OF THE CODE OF CONDUCT

The Code of Conduct is intended to serve as a standard for all RA employees in making decisions in their professional lives and, at times, in their private lives. By following this Code of Conduct, it is intended that all employees will contribute to strengthening the professionalism and impact of the work of RA.

The Code of Conduct forms part of the terms and conditions of employment of all employees. Further information and detail on specific aspects of this Code can also be found in RA's Policies and Procedures.

1. All employees will be given a copy of this Code of Conduct and be required to familiarize themselves with its requirements, by reading and discussing the Code with their department.
2. Further information on the provisions within the Code can be found in RA's policies, procedures and guidelines. If needed, employees may seek further clarification from a member of the Human Resources team.



3. For employees relocating/based in another country for work purposes, guidance will also be given in relation to local specific customs and legal requirements, in order to inform the behavior that they will be expected to adopt.
4. Further guidance and information will also be distributed to each office and workplace and may also be found in related documents (e.g. Appraisals, Induction Guidelines).
5. HR has a responsibility to ensure that all employees via their department leads, including newly recruited staff, are informed about the Code of Conduct, understand its provisions clearly, and departmental leads confirm the same.
6. All Managers have a particular responsibility to uphold the standards of conduct and to set an example.
7. In the recruitment and selection of employees, HR will seek to ensure that candidates selected support the beliefs and values of RA and do not have a work history that contravenes the requirements of this Code.
8. Any employee who has concerns about the behavior of another employee should immediately raise these with HR/Security. Any concerns will be treated with urgency, consideration and discretion.
9. Any breaches to the requirements of this Code of Conduct will be subject to investigation and possible disciplinary action in line with RA’s Disciplinary procedure.

Department Managers have a duty of care to ensure that employees working in their respective departments fully understand the RA Code of Conduct and thus agree to abide by its requirements and commit to upholding the standards of conduct required to support RA. This policy supersedes all other offerings and is to replace any legacy code of conduct on all noticeboards or folders.

Soraya Narfeldt  
CEO

Policy Implementation/ Review Date	Next Policy Review Date
January-2026	January-2027