

# REAPS MOSS LIMITED

## ANTI-BRIBERY & CORRUPTION POLICY

---

Reaps Moss Limited (the “Company”) is an Operational Wind Farm which provides renewable energy under the OFGEM ROC scheme.

### **Purpose**

The purpose of this document is to set out the responsibilities of the Company in observing and upholding laws and regulations on Anti- Bribery & Corruption.

### **Scope**

This policy covers all directors, personnel and contractors. The application of this policy extends to agents acting or providing services on the Company’s behalf. For Third Party Providers, the Company requires the adoption of policies consistent with the standards set out in this document.

The Company requires all directors, personnel, contractors and agents to act ethically and requires that the standards laid out within this Policy are followed. Any instance of a breach, or suspected breach, of this Policy will be investigated and appropriate disciplinary action taken as necessary.

### **Risk Appetite**

The Company has zero appetite for breaching bribery and corruption legislation and/or regulation.

### **Policy**

The materialisation of Bribery & Corruption events may stem from any number of root causes, but it is clear that poor transparency, controls and standards encourage their proliferation. Consequently, this policy defines clear principles which outline the Company’s position on Bribery & Corruption.

#### **The Company must at all times ensure that it:**

- conducts its business fairly, honestly, transparently and with integrity
- does not make or offer bribes, whether directly or indirectly, to gain business advantage
- does not request or accept bribes, whether directly or indirectly, to give business or other advantage
- develops an evolving programme and procedures to implement and support these standards

#### **Directors, personnel, contractors and agents acting or providing services on the Company’s behalf are required to:**

- refuse any bribe or inducement in a manner that is not open to misunderstanding or which may give rise to false expectations
- report any offers of bribes or inducements received
- report any suspicious behaviour
- report any breaches of the policy, related principles or associated legislation

**N.B. Any proven instance of anyone accepting or offering a bribe will be considered an act of gross misconduct and the relevant authorities will be informed.**

### **Facilitation Payments**

Facilitation Payments (otherwise known as “grease payments”) typically involve a small payment to a government or public officials, whether directly or indirectly, to allow some administrative procedure to occur more quickly or at all e.g. issuing permits or licenses. These are not seen by many as being equivalent to large scale corruption and as such are not illegal in certain countries. However, the Company considers facilitation payments to be illegal and makes no defence for them. As a result, the Company has a zero-tolerance policy on this activity.

# REAPS MOSS LIMITED

## ANTI-BRIBERY & CORRUPTION POLICY

---

### **Political Contributions**

It is the Company's policy that it does not make any donations to political parties, nor does it incur political expenditure.

### **Charitable Donations**

All charitable donations by the Company should be recorded accurately in the financial records of the Company.

### **Gifts, Entertainment and Hospitality**

All gifts, hospitality and entertainment that directors and employees give or receive in the context of their activities for the business should be recorded accurately in the financial records of the Company. This Policy even remains applicable in cases where a director or employee pays for a gift, entertainment or hospitality, but it is not reimbursed by the Company.

This Policy does not prohibit entertainment and hospitality with third parties (whether given or received) where it is normal and appropriate in a particular relationship or context and where it is not provided with the intention of improperly influencing a person to obtain or retain business or a business advantage, or with the intention of improperly rewarding a person for providing business or a business advantage.

No gifts, hospitality or entertainment should be accepted or offered if it could be perceived to be lavish or excessive or inappropriately frequent. In most cases, reasonable ordinary levels of hospitality (and related expenditure) intended to foster cordial relationships or promote the Company's image will be acceptable under this Policy and the law.

### **Disciplinary Sanctions**

Any proven instance of anyone accepting or offering a bribe, committing corruption, or making facilitation payments will be considered an act of gross misconduct and the relevant authorities will be informed. Any third parties who perform services for or on behalf of Reaps Moss Limited and breach this Policy will be reported to the relevant authorities and the Company reserves the right to terminate their appointment.

### **Employee and Agents Responsibility**

The prevention, detection and reporting of bribery is the responsibility of all the Company's employees and agents.

The Company will ensure that this policy is reviewed by its Board of Directors and amended as required at least on an annual basis.

Signed:   
Director .....  
Alexander Balikhin

Dated: 08/06/2022 .....