

Supplier Code of Ethics and Conduct – Third Party Guidelines

The RMU Supplier Code of Ethics and Conduct Policy (POL-PRO-007) requires compliance with the highest ethical standards and all anti-corruption laws applicable where RMU (whether through an agent or otherwise) conducts business. POL-PRO-007 requires all RMU employees, and any others acting for or on behalf of RMU, to ensure that all dealings with outside parties, both in the private and government sectors, are carried out in compliance with all relevant laws and regulations and with the standards of integrity required for all RMU business. RMU values integrity and transparency and has zero tolerance for corrupt activities of any kind, whether committed by RMU employees, officers, or outside parties acting for or on behalf of RMU.

Corrupt Payments – RMU employees and any outside party acting for or on behalf of RMU, shall not, directly or indirectly, promise, authorize, ratify or offer to make or make any “payments” of “anything of value” (as defined in the glossary section) to any individual (or at the request of any individual) including a “government official” (as defined in the glossary section) for the improper purpose of influencing or inducing or as a reward for any act, omission or decision to secure an improper advantage or to improperly assist the company in obtaining or retaining business.

Government Officials – Although RMU’s policy prohibits payments by RMU or outside parties acting for or on its behalf to any individual, private or public, as a “quid pro quo” for business, due to the existence of specific anticorruption laws in the countries where we operate, this policy is particularly applicable to “payments” of “anything of value” (as defined in the glossary section), or at the request of, “government officials” (as defined in the glossary section).

Facilitating Payments – For the avoidance of doubt, facilitating payments (otherwise known as “greasing payments” and defined as payments to an individual to secure or expedite the performance of a routine government action by government officials) are no exception to the general rule and therefore prohibited.

GLOSSARY

The terms defined herein should be construed broadly to give effect to the letter and spirit of the ABAC Policy. RMU is committed to the highest ethical standards of business dealings and any acts that create the appearance of promising, offering, giving or authorizing payments prohibited by this policy will not be tolerated.

Anything of Value: this term includes cash or cash equivalents, gifts, services, employment offers, loans, travel expenses, entertainment, political contributions, charitable donations, subsidies, per diem payments, sponsorships, honoraria or provision of any other asset, even if nominal in value.

Payments: this term refers to and includes any direct or indirect offers to pay, promises to pay, authorizations of or payments of anything of value.

Government Official shall mean:

- Any officer or employee of a government or any department, agency or instrument of a government;
- Any person acting in an official capacity for or on behalf of a government or any department, agency, or instrument of a government;
- Any officer or employee of a company or business owned in whole or part by a government;
- Any officer or employee of a public international organization such as the World Bank or United Nations;
- Any officer or

employee of a political party or any person acting in an official capacity on behalf of a political party; and/or

- Any candidate for political office