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**CODE OF ETHICS – POLICY STATEMENT**

Rabest Company Limited (RCL) is committed to the conduct of its business in an ethical and fair manner, to the promotion of a corporate culture which is non – sectarian and political and which is socially and environmentally responsible. This is achieved by living the core values of the Rabest Company Limited (RCL) being:

Safety : “If we cannot work safely, we will not work”.

Responsibility : We act responsibly and care for the environment, each

other, and all of our stakeholders - our employees and our communities.

Honesty : We act with fairness, integrity, honesty and transparency.

Respect : We treat each other with trust, respect and dignity.

Innovation : We encourage innovation and entrepreneurship.

Delivery : We do what we say we will do.

These values are then carried through in the following principles:

* Honesty, transparency, accountability, fairness and integrity in all business dealings;
* Having respect for the human rights and the integrity of all employees;
* Acceptance and tolerance of diverse cultures, religions, race, gender and sexual orientation;
* Compliance with and adherence to sound standards of corporate governance and obeying all applicable laws, the rules and regulations of all applicable government agencies.

In pursuing these principles, Rabest Company Limited (RCL) requires its employees to adhere to the Rabest Company (RCL) Code of Ethics with regards to the following standards:

**CONFLICT OF INTEREST**

Avoid placing Rabest Company Limited (RCL) employees in a position where personal interests may, or may appear to be in conflict with those of RCL A. conflict between their interests and those of RCL could arise in a number of situations including the following;

* Where they have or acquire an interest in any entity which is not owned or controlled by Rabest Company Limited, including, without limitation, by being a shareholder, member or director, owner or parter.

This does not apply to investments in shares which are listed on a registered stock exchange;

* Doing business on behalf of RCL with your company/a potential supplier, advisor, customer, competitor or business associate of RCL in which they, their spouse or immediate family member has an interest of any nature whatsoever;
* Granting personal fevers or any form of preferential treatment to any RCL employees directly or indirectly;
* Let any RCL employees enter into any agreement, arrangement or understanding with any third party to the detriment of RCL;
* Let them contract with any third party, who is a current or potential supplier, advisor, customer, competitor or business associate of RCL in your private capacity or other than as a representative of RCL;

**CONFIDENTIAL INFORMATION**

* You are required to treat all information to which you are or become pricy to by virtue of your being a potential supplier, advisor, customer, competitor or business associate to Rabest Company Limited (RCL) including, without limitation, information pertaining to RCL which is not in the public domain, in the strictest confidence. The obligation of confidentiality continues to bind you even after your tenure at RCL.
* Confidential information about RCL, its operations and properties may not be used without prior authorization by RCL management who may, in turn, require guidance from the RCL general counsel.
* You will not resort to disclose or use such information for any purpose whatsoever other than the business purpose for which it was disclosed to you.

**GIFTS AND BUSINESS COURTESIES**

* You are not permitted to give directly or indirectly, favours, gifts or business courtesies that might compromise or be seen to compromise to the entire professionalism or impartiality or which may, in any way impair the ability to act or be seen to act with integrity and in the best interest of Rabest Company Limited (RCL).
* Cash payment, discounts or vouchers, no matter how small, must not be granted under any circumstances from your business entity.
* You are however, not precluded from giving out novelty or advertising items of a normal value (defined below), which are widely distributed by you eg. Wine, calendars, pens, diaries, ties etc. should the value of any of the novelty or advertising items exceed the nominal value defined below, then

approval to grant such items should be obtained from a Rabest Company Limited Supply chain Manager.

\*Nominal Value **= GH₵120 or 200**.

**ENTERTAINMENT AND HOSPITALITY**

* Although Rabest Company limited recognizes that hospitality and social engagement plays a valuable role in the building of business relationships, you must not provide hospitality which influences or might be seen to influence the RCL employee’s and relationships.
* Any invitation which you provide must be within the limits of reasonableness and good taste and be consistent with the principles espoused in this document.
* The payment or reimbursement of travel, accommodation and or living expenses should not be made available to RCL employees.

**NOTE;**

Rabest Company Limited (RCL) will not pay bribes. Bribery is unethical because it undermines the fairness of the market, distorts transaction costs and fair compensation and in many cases is illegal.

A bribe includes anything of value, such as cash, a cash equivalent, a gift or other benefit or advantage , which is offered or received to obtain a improper advantage or to encourage the recipient to misuse his or her position. A bribe may be made before or after an event such as the decision to award a contract or license the more offering of a bribe is wrongful, even though the bribe in itself is not accepted.

All large, inappropriate, and expensive gifts over the value of USD 100 are regarded as bribes.

Should any employee be found to have accepted a bribe (s) then the case would be handed over to the Ghanaian Police Services for Prosecution.

Rabest Company Limited(RC L) is aware of all anti-bribery laws that apply to our business including the UK Bribery Act 2010 and that US Foreign Corrupt Practices Act, and so we shall work with Trace International for our International Trace Certification.

Rabest Company Limited (RCL) strictly prohibits facilitation payments.

Facilitation fees involve the payment of small sums to government officials to obtain routine services to which R C L would legally be entitled to ,i.e. a payment to expedite a visa application.

All gift provided by your business entity will be recorded in the R C L gift register.

Signed ………………… DATE……………….............

**Rabel Botchway**

**C E O**