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Regent Gas Ltd

Anti-Bribery, Corruption, and Counter-Fraud Policy

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Distribution List

Name	Title or Stream	Location
Paul Mandair	Managing Director	Regent Gas

Document Control
Version History

Version	Status	Date	Author	Description of Change
0.1	Approved	1st Feb 2021	Alunga Kalawe	Release of the first version
0.2	Released	19 Sept 2024	Alunga Kalawe	Consolidated Anti Bribery and Fraud policy
0.3	Released	28 Oct 2025	Alunga Kalawe	Change of layout

Formal Reviewers

Name	Title	Location
Alunga Kalawe	Regulation & Compliance Manager	Regent Gas

Management Approval

Name	Title
Paul Mandair	Managing Director

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Table of Contents

DISCLAIMER 4
1 Policy Statement 4
2 Scope 4
3 Definitions 4
3.1 Fraud 4
3.2 Bribery 4
3.3 Corruption 5
4 Key Principles 5
5 Responsibilities 5
5.1 Board of Directors and Senior Management 5
5.2 Managers 6
5.3 All Employees 6
5.4 Compliance Officer 6
6 Risk Assessment, Prevention, and Due Diligence 6
7 Gifts and Hospitality 7
8 Reporting Concerns 7
9 Investigation and Response 7
10 Training and Communication 8
11 Monitoring and Review 8
12 Associate policies 8

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DISCLAIMER

This policy is valid for all Regent Gas businesses including Regent Gas Ltd, Regent Power Ltd and Energy Metering Solutions (EMS).
This policy has been written in line with the Document Control Policy.

1 Policy Statement

Our Company is committed to conducting business with the highest standards of integrity, honesty, and transparency. We have a zero-tolerance policy towards fraud, bribery, and corruption in all its forms. This policy outlines our approach to preventing, detecting, and responding to fraud, bribery, and corruption.

2 Scope

This policy applies to all employees (including temporary and agency workers), board members, consultants, contractors, vendors, and any individuals or organizations acting on behalf of our Company.

3 Definitions

3.1 Fraud

Fraud is the use of deception to dishonestly make a personal gain and/or create a loss for another party. The Fraud Act 2006 defines three classes of fraud:

- Fraud by false representation
- Fraud by failing to disclose information
- Fraud by abuse of position

3.2 Bribery

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Bribery is the offer, promise, giving, requesting, or accepting of a financial or other advantage as an inducement or reward for improper performance of a function or activity. The Bribery Act 2010 sets out offenses relating to:

- Making a bribe
- Requesting or accepting a bribe
- Bribing foreign public officials

3.3 Corruption

Corruption is the misuse of power for personal gain or advantage.

4 Key Principles

Our company strictly prohibits fraud, bribery, and corruption. We adhere to the highest ethical standards and comply with all relevant laws.

We have zero tolerance for corrupt activities. Employees and representatives must not offer, give, request, or accept bribes or facilitation payments.

We are committed to preventing, detecting, and responding to fraud, bribery, and corruption through robust systems and procedures. Our business practices are fair, honest, and transparent. Employees cannot accept money, gifts, or hospitality intended to improperly influence decisions. We avoid doing business with those who do not commit to ethical practices. We conduct risk assessments and due diligence on third parties, and our contracts include anti-bribery and anti-fraud clauses.

5 Responsibilities

5.1 Board of Directors and Senior Management

- Establish and maintain a strong ethical culture
- Ensure adequate resources are allocated to counter fraud, bribery, and corruption
- Oversee the implementation and effectiveness of this policy

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5.2 Managers

- Promote employee awareness of this policy
- Ensure that there are mechanisms in place to assess and mitigate risks
- Report any suspicions of fraud, bribery, or corruption immediately

5.3 All Employees

- Comply with this policy and all related procedures
- Remain vigilant and report any concerns or suspicions promptly
- Complete all required training related to this policy
- Act with honesty, integrity, propriety, and due care in all matters, particularly in safeguarding the company, its associated assets, and its reputation

5.4 Compliance Officer

- Oversee the day-to-day implementation of this policy
- Conduct risk assessments and implement appropriate controls
- Investigate all reported incidents of fraud, bribery, or corruption
- Monitor the effectiveness of this Policy and review its implementation regularly

6 Risk Assessment, Prevention, and Due Diligence

Our Company will regularly assess and evaluate its overall vulnerability to fraud, bribery, and corruption.

We will implement and maintain robust internal controls, including:

- Segregation of duties
- Authorization and approval procedures
- Physical and electronic security measures
- Regular reviews

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Was much as possible, we will perform due diligence on third parties to ensure they align with our commitment to ethical business practices. We will maintain accurate and fair records of all financial transactions, prohibiting off-the-book accounts, vague transactions, or false entries. All payments and expenses must be properly documented and approved.

7 Gifts and Hospitality

The giving and receiving of modest gifts and hospitality may be acceptable when it is customary and proper for business relationships. However, all gifts and hospitality must be:

- Reasonable in value and infrequent
- Given openly, not secretly
- Not intended to influence a business decision improperly

8 Reporting Concerns

We encourage all employees, contractors, and third parties to report any suspicions of bribery, corruption, or fraud without fear of retaliation.

Reports can be made through the following channels:

- Line manager (for internal employees)
- Compliance Officer (for all)

All reports will be treated confidentially and investigated thoroughly. We prohibit retaliation against anyone who reports a concern in good faith.

9 Investigation and Response

All reported concerns will be promptly and thoroughly investigated under the Compliance Officer’s oversight. We will fully cooperate with any external investigations by law enforcement or regulatory authorities. If illegal activity is confirmed, we will take appropriate disciplinary action, up to and including dismissal, and report the matter to the relevant authorities. We will also seek to recover any losses incurred due to fraud, bribery, or corruption.

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10 Training and Communication

All employees will receive regular awareness on this policy and related procedures.

This policy will be communicated to all employees. Our zero-tolerance approach to bribery, corruption, and fraud will be communicated upon request to any contractors, associated persons, suppliers, organisations, third parties, contractors, and business partners.

11 Monitoring and Review

The Compliance Officer will monitor the effectiveness of this Policy and review its implementation regularly, considering its suitability, adequacy, and effectiveness.

Internal control systems and procedures will be subject to regular review to provide assurance that they are effective in countering bribery, corruption, and fraud.

This Policy will be reviewed annually and updated as necessary to reflect changes in legislation, business practices, or company procedures.

12 Associate policies

- Employee Handbook
- Data Privacy Policy
- Information Security Policy

End of Document

Approved by

Paul Mandair
Managing Director

Signature

Paul Mandair