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#### Introduction

The Company is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is the Company's policy to conduct all aspects of its business in an honest and ethical manner at all times.

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If the Company is found to have taken part in the corruption or lacks adequate procedures to prevent Bribery, it could face an unlimited fine and be excluded from tendering for contracts.

#### **Policy**

The aim of this policy is to help the Company act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero-tolerance' to bribery.

This policy applies to all staff employed by the Company, and any contractors, consultants or other persons acting under or on behalf of the Company.

#### The Company will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, "kickbacks" of any kind.

#### **Company Responsibility**

The Company will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.

• See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

## **Employee Responsibility:**

Employees must not:

- Accept any financial or other reward from any person in return for providing some favour.
- Request a financial or other reward from any person in return for providing some favour.
- Offer any financial or other reward from any person in return for providing some favour.

#### Non Compliance

All employees have a role to play in enforcing the policy and are required to deal with any observed or reported breaches. Should employees feel apprehensive about their own safety with regard to addressing any breach, they should seek senior management support.

Failure to comply with this policy may lead to a lack of clarity over job role, learning needs or expected standards of performance, resulting in reduced effectiveness or efficiency, underperformance and putting service delivery at risk.

Any member of staff refusing to observe the policy will be liable to disciplinary action in accordance with the Company's Disciplinary Policy up to and including dismissal.

## Implementation of the Policy

Overall responsibility for policy implementation and review rests with the Company senior management. However, all employees are required to adhere to and support the implementation of the policy. The Company will inform all existing employees about this policy and their role in the implementation of the policy. They will also give all new employees notice of the policy on induction to the Company.

This policy will be implemented through the development and maintenance of procedures for appraisals and one-to-one meetings, using template forms, and guidance given to both managers and employees on the process.

For and on behalf of Rolaar Ltd

Signed: Date: 01/01/2022

At ROLAAR Limited safety is our overriding priority and we regard the co-operation of our supply chain throughout the tiers as essential to maintain the highest standards for all the goods we supply. We understand the potential risks concerning the supply of Counterfeit, Fraudulent and Suspect Items (CFSI) within the supply chain, and to this end we only choose suppliers that can demonstrate the quality and source of the goods that we require.

All our employees involved in the purchasing of goods have been informed about the potential for CFSI and advised that all goods must be purchased directly from the manufacturers or from agreed and official distribution channels. Rolaar has a written Procurement Change Control Procedure no. 124 to control the supply chain in the event of change and a written Goods Received Procedure to ensure material and component traceability back to source suppliers. Rolaar does not purchase any raw materials.

Counterfeit Materiel\* has been described by the MOD as material whose origin, age, composition, configuration, certification status or other characteristic (including whether the material has been used previously) has been falsely represented by:

- misleading marking of the material, labelling or packaging
- misleading documentation: or any other means, including failing to disclose information

Rolaar have service level agreements with all suppliers and sub-contractors on their approved supplier list

This SLA includes:

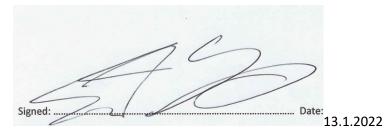
- applicable Quality standards required by Rolaar
- Pprovision's for legal and regulatory compliance

### Rolaar hold one Formal contract as suppliers to National Grid

This Contract includes:

- A clause stipulating those suppliers must verify the authenticity of goods
- A clause holding suppliers responsible for fraudulent goods
- Contract clause(s) to penalize non-compliance of goods
- Procedures or contracts requiring that suppliers must use only approved manufacturers
- Procedures or contracts requiring that suppliers must notify changes to their manufacturing process

This statement will be reviewed for suitability as part of the Annual Management Review.





# **Equality and Diversity Policy**

Rolaar Limited is committed to promoting equality and diversity in all aspects of its business. As an employer Rolaar aspires to promote a diverse, inclusive and representative working environment in which everyone is treated with dignity and respect. Equality and Diversity is a business issue, this policy embodies an ethical rejection of discrimination, not just a compliance with statutory requirements.

In pursuance of the policy, Rolaar aims to ensure that all staff, job applicants, clients and customers are treated fairly regardless of sex, marital or civil partnership status, race (which includes colour, nationality, ethnic or national origin), disability, sexual orientation, age, medical status and religion or belief.

The promotion of equality and diversity will be pursued through Rolaar recruitment and selection procedures, training, career development, disciplinary procedures and all other aspects of the company's management.

The policy statement will be reviewed annually.



On behalf of Rolaar Limited

# **Fair Trade Policy**

#### Introduction

The Fairtrade Foundation exists to ensure a better deal for marginalised and disadvantaged producers in the developing world. The Foundation awards a consumer label the FAIRTRADE Mark to products which meet internationally recognised standards of Fair Trade.

Supplying Fairtrade products fits in with Rolaars commitment to sustainable development and Corporate Social Responsibility. Both the University and the Guild recognise the significant impact they can have on promoting ethical consumption and consumerism by adopting a Fairtrade policy and thus gaining Fairtrade status as defined by the Fairtrade Foundation.

## **Policy Statement**

The Company Rolaar is committed to supporting, using and promoting Fairtrade products by the following means:

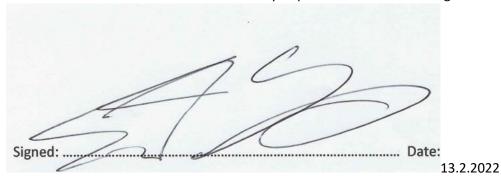
## 1. Provision of Fairtrade products

Fairtrade products will be utilised in all possible situations. Where this is not possible, there is a commitment to begin to use Fairtrade products as soon as it becomes possible to do so. The provision of Fairtrade products will be regularly reviewed.

#### 2. Hospitality

Fairtrade products (for example, coffee and tea) will be served at all meetings hosted by the company at the management offices where available.

This statement will be reviewed for suitability as part of the Annual Management Review.





# **Modern Slavery / Human Trafficking Policy**

Rolaar Limited is committed to meeting the aims of the Modern Slavery Act 2015. We strongly oppose slavery and human trafficking in our supply chains and any part of our business. We would never knowingly engage with suppliers, contractors or sub-consultants involved in slavery or human trafficking.

As part of the company's due diligence processes in connection with its slavery and human trafficking policy, the supplier approval process will incorporate a review of the controls undertaken by the supplier(s). Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.

The company directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training etc) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically.

The policy statement will be reviewed annually.

