



## Rockman Industries – Anti-Bribery & Anti-Corruption Policy

Doc No : P-P1-06-05-10

Revision No. : 00

Revision Date : 19/12/2023

**Scope:** Applies to all employees, vendors, contractors, consultants, external auditors, and any third-party associates working with Rockman

### 1. Our Commitment

At Rockman, we uphold the highest standards of ethics, honesty, and integrity. We are firmly committed to conducting business fairly and transparently. **Bribery and corruption are strictly prohibited in any form**, and we have a **zero-tolerance policy** towards such practices—whether directly or through third parties.

### 2. What We Mean by Bribery and Corruption

- **Corruption** means abusing one's role or power for personal gain or improper advantage.
- **Bribery** refers to offering, promising, giving, receiving, or soliciting anything of value—such as money, gifts, favours, hospitality, or services—with the intent of influencing someone's decision or securing an unfair benefit.

This includes:

- Payments or gifts to government officials or customers to win contracts.
- Offering personal favors or donations in return for special treatment.
- Accepting gifts or commissions in exchange for awarding business.

### 3. Who Must Follow This Policy

This policy is **mandatory** for:

- All Rockman employees (full-time, part-time, contract, or temporary)
- Senior leadership and Board members
- Suppliers, service providers, consultants, auditors, and agents acting on Rockman's behalf

Every individual and organization representing Rockman is expected to follow this policy in both letter and spirit.

### 4. Employee Responsibilities

Every Rockman employee must:

- Act with honesty and integrity in all business interactions.
- Never offer, accept, or facilitate bribes—whether in cash or kind.
- Avoid conflicts of interest where personal relationships or benefits could impact business decisions.
- Refuse any demand or offer of a bribe and report it immediately.
- Be cautious while dealing with public officials, procurement officers, auditors, and regulators.

	<b>Rockman Industries – Anti-Bribery &amp; Anti-Corruption Policy</b>	Doc No : P-P1-06-05-10
		Revision No. : 00
		Revision Date : 19/12/2023

- Maintain accurate and transparent records—no false or misleading entries in expense or accounting reports.

## 5. Managerial & Leadership Responsibilities

Managers are expected to:

- Lead by example and actively communicate this policy to their teams.
- Conduct due diligence on third parties and vendors before engaging them.
- Monitor processes and transactions for any signs of unethical conduct.
- Immediately act upon any suspicion or complaint regarding bribery or corruption.
- Ensure third-party agreements have appropriate anti-bribery clauses.

## 6. Third Parties: Contractors, Suppliers, and Consultants

Rockman expects the same ethical standards from its business partners. All third parties must:

- Refrain from offering any kickbacks, commissions, or personal benefits to Rockman employees.
- Avoid giving or receiving improper gifts or entertainment that could influence business judgment.
- Disclose any prior relationships with Rockman personnel that could present a conflict of interest.
- Report to Rockman management if any Rockman employee demands a bribe or engages in unethical conduct.

Any violation may lead to immediate termination of business and blacklisting from future engagements.

## 7. Gifts, Hospitality & Donations

Rockman permits reasonable and occasional gifts or hospitality **only if**:

- They are modest in value and culturally appropriate.
- They are not given or received with the intent to influence a decision.
- They are not frequent or lavish.

**Cash gifts or equivalents (like gift cards or vouchers)** are strictly forbidden.

Charitable donations or sponsorships must:

- Be lawful and transparent
- Be approved by designated authority
- Not be used as a channel for bribery



## Rockman Industries – Anti-Bribery & Anti-Corruption Policy

Doc No : P-P1-06-05-10

Revision No. : 00

Revision Date : 19/12/2023

### 8. Reporting & Whistleblowing

If you:

- Suspect any form of bribery or unethical conduct
- Witness any violation of this policy
- Are unsure whether an act constitutes bribery

You must report it immediately to your manager or the HR.

Reports can also be raised anonymously through Rockman's Whistleblower mechanism. **No retaliation** will be tolerated against individuals who report concerns in good faith.

### 9. Disciplinary Action

Any violation of this policy will result in strict disciplinary action, which may include:

- Termination of employment or contract
- Legal action
- Reporting to regulatory or law enforcement authorities

### 10. Review and Updates

This policy will be reviewed regularly to ensure its relevance and effectiveness. Updates will be communicated to all stakeholders accordingly.