

ANTI-BRIBERY AND CORRUPTION POLICY OF ROMILDAMOR FOUNDATION

1. Anti-Bribery and Corruption Policy Statement

ROMILDAMOR Foundation (the “**Foundation**”) is a women's rights organisation that works to support women and girl survivors of human trafficking, gender-based violence and child marriage. ROMILDAMOR’s three streams of work include: (i) capacity building by providing survivors with access to career and academic development, legal support and therapy; (ii) community awareness events; and (iii) fundraising for survivors and for the operational costs of the Foundation by designing and selling womenswear.

We are committed to conducting our charitable work in an honest and ethical manner and complying with applicable laws and regulations, including the Bribery Act 2010 (the “**Act**”). We therefore take a zero-tolerance approach to bribery and corruption. We have considered the bribery and corruption risks we face, and we are committed to implementing and enforcing effective measures to address those risks. This Policy is one such measure. This Policy addresses what we must do in order to prevent and prohibit bribery and corruption. This Policy is based on a written risk assessment exercise with respect to the Foundation and its activities. Any questions concerning this Policy should be referred to Sharon Asare Opoku or their delegate (the “**Reporting Officer**”).

Violations of this Policy may constitute violations of applicable laws. In particular, anyone involved in bribery or corruption is at risk of committing a criminal offence. Individuals found guilty of such offences can be imprisoned and / or fined. The Foundation could also face severe consequences – including criminal liability – if a director, advisor, officer, trustee, volunteer, employee or Business Partner (as defined below) engages in bribery or corruption.

This Policy will be reviewed at least annually, and may be updated or changed accordingly. You should always refer to the most up-to-date version.

2. Scope

This Policy is mandatory and applies to all directors, advisors, officers, trustees, employees, volunteers and Business Partners of the Foundation (collectively, “**Covered Persons**”).

Covered Persons shall be provided with a copy of this Policy. Any Covered Person who violates this Policy may be subject to disciplinary action or termination of the engagement.

3. Definitions

“**Advantage**” means a financial advantage (e.g. cash, cheque, bank transfer) or any other kind of advantage, benefit or thing of value. This includes tangible things (like a gift or hospitality) and intangible things (like discounts, credit or better payment terms).

“**Business Partner**” means an individual or business that acts on behalf of the Foundation, or performs any services for or on behalf of the Foundation, in any capacity. This may include other charitable and non-charitable organisations, contractors, consultants and agents, among others.

“Foreign Public Official” means an individual who holds a legislative, administrative or judicial position outside the UK (e.g. a minister, an MP, a civil servant or a judge), is an employee or representative of a national or local government agency or public entity outside the UK (e.g. a mayor, a local council member or an employee of a state-owned company), or is an employee or representative of a public international organisation (e.g. an official of the United Nations or the World Bank).

4. What is bribery and corruption?

Broadly, ‘bribery’ means offering, promising or giving someone an Advantage to encourage them to perform their functions or activities improperly, and includes where it is known or believed that the acceptance of the Advantage in itself constitutes improper performance. It also means asking for or agreeing to accept a bribe.

The Act creates the following offences:

- offering, promising, giving, authorising, requesting, accepting or agreeing to receive a payment or other Advantage as an inducement or reward for improper behaviour (such as doing something illegal or acting in breach of trust or an expectation of impartiality or good faith);
- offering, promising, giving, authorising, requesting, accepting or agreeing to receive a payment or other Advantage in order to influence a Foreign Public Official (in a way not permitted by law) in order to get or keep business or an advantage in the conduct of business; and
- the corporate offence of failing to prevent bribery.

Bribery has no lower limit. Even a small payment or a low value Advantage can be a bribe.

The Act applies to charities, which may encounter corruption wherever they operate. Individuals acting for charities should avoid any situation where there is expectation of a gift or payment in return for an Advantage.

There are significant risks for lawfully operating charities if they are associated in any way with bribery. A charity accused or convicted of bribery offences may find that this could jeopardise future funding and contracts, and compromise its credibility and reputation.

‘Corruption’ generally refers to someone in a position of power or authority abusing their position for personal benefit. It often involves bribery, but can involve other types of criminal behaviour (such as theft and money laundering).

5. Prohibited Conduct

You must not, personally or through someone else:

- offer, promise, give, authorise, request, accept or agree to receive a bribe or anything that could be seen as such, of any amount or in any form;
- become involved in any form of corruption or anything that could be seen as such;
- permit or ignore the involvement of others in bribery or corruption or anything that could be seen as such;

- threaten or retaliate against anyone who has refused to act in breach of this Policy or who has raised concerns further to this Policy; or
- engage in any other activity that risks breaching this Policy.

These requirements are explained in more detail below. They apply in all situations, including situations where the Foundation could be disadvantaged or suffer some loss as a result.

6. Facilitation Payments

A facilitation payment or ‘grease payment’ is a small unofficial payment made to a person to encourage them to perform or speed up their ordinary duties. For example, an unofficial payment to obtain a visa, or to ensure that goods pass through customs without delay, will be a facilitation payment.

Facilitation payments are a form of bribery and are strictly prohibited by this Policy. Covered Persons must not make or offer to make facilitation payments (directly or indirectly).

This does not prevent payments that are permitted or required under applicable laws (e.g. if there is a legitimate process that allows you to pay for a priority visa application).

7. Gifts, Entertainment and other Business Courtesies

Gifts, entertainment and other business courtesies (“**Business Courtesies**”) can play an important role in building business and personal relationships. However, they can also be inappropriate, and in some circumstances may be viewed as bribes. This is a particular risk if they are of excessive value or given too frequently, or could otherwise appear to have improper influence on a business relationship or decision.

Covered Persons may, with prior written approval of the Reporting Officer (i) give or receive gifts of a value up to GBP 50; or (ii) provide meals, provided that the expenses are kept within a reasonable and pre-approved level. Business Courtesies must not include cash or cash equivalent (such as vouchers), be given in secret, and must be given in the Foundation’s name, not in the name of Covered Persons. A written record must be kept by the Reporting Officer of all Business Courtesies, including those refused as a result of not being acceptable under the terms of this Policy.

If you have any questions about the Foundation’s requirements and expectations regarding Business Courtesies (in general or in relation to a particular situation), speak to the Reporting Officer.

8. Donations

The Foundation does not make political donations.

9. Business Partners

We may work with various Business Partners, including non-governmental organisations (NGOs), contractors, consultants, agents and others who perform services for or on behalf of the Foundation. Business Partners must abide by our ethical principles and, in particular, comply with this Policy while

working for us. Failure to do so could lead to severe consequences for the Foundation, up to and including criminal liability.

We must therefore carry out due diligence on Business Partners and implement appropriate monitoring and controls to ensure that we only work with Business Partners who are responsible, reputable and meet our ethical standards.

Before deciding whether to engage a Business Partner, the trustees, or their delegates, will carry out appropriate due diligence checks to ensure that the Business Partner is of good standing, and to identify any red flags suggesting the Business Partner has engaged in bribery, corruption or unethical conduct, or raising questions about the Business Partner's ethics.

Checks may include searching public sources (e.g. via online searches for news articles or court proceedings), consulting industry contacts, obtaining and contacting references, and / or asking the Business Partner relevant questions (e.g. about how it operates, who owns and controls its business, what it does to ensure ethical conduct, whether it has encountered ethical issues in the past and how it reacted, etc.).

The trustees, or their delegates, will determine the appropriate checks in each case, and will document the checks carried out and their results. Business Partners that are not well known, that will operate in higher risk jurisdictions, or that will carry out higher risk activities (e.g. interacting with Foreign Public Officials) will normally require more in-depth due diligence, and annually updated due diligence if they are engaged for more than a year.

The trustees, or their delegates, will monitor the Business Partner to ensure that it is carrying out its work for us in accordance with this Policy and our ethical principles. All Business Partners will be required to:

- regularly update the trustees on their work for us; and
- get prior approval from the trustees and Reporting Officer to make payments on the Foundation's behalf or engage other Business Partners.

The trustees, or their delegates, will determine whether additional monitoring or controls are needed in each case. In particular, Business Partners operating in higher risk jurisdictions or carrying out higher risk activities may require additional monitoring or controls.

Contracts with Business Partners must include a requirement to comply with this Policy, the Foundation's ethical principles and applicable laws in respect of the work done on our behalf, and a right for the Foundation to terminate the contract if this requirement has been (or appears to have been) breached.

10. Interactions with Business Partners and Suppliers

It is important that all interactions between (i) our directors, advisors, officers, trustees, employees and volunteers and (ii) our suppliers and Business Partners (current or potential) are professional and do not involve anything that could be seen as unethical.

In particular, you must not solicit anything of value (including gifts, money or time) from current or potential suppliers or Business Partners, for your own benefit or anyone else's benefit, for any reason.

Similarly, you must not accept anything of value (including gifts, money or time) from current or potential suppliers or Business Partners, for your own benefit or anyone else's benefit, other than with prior approval from the Reporting Officer.

We will not tolerate any form of actual or attempted bribery, improper influence or other unethical conduct directed towards directors, advisors, officers, trustees, employees or volunteers by current or potential suppliers or Business Partners. Any such conduct, or attempt at such conduct, must be reported immediately to the Reporting Officer or the trustees who will take appropriate action. This may include ending the relationship.

11. Invoices and Financial Record-Keeping

We must keep accurate financial records and have appropriate internal controls in place to ensure that there is a clear reason and supporting evidence for all payments. All payments made on our behalf must be supported by appropriate documentation. In particular, accounts, invoices and other records relating to Business Partners' work must be accurate and complete. Accounts must not be kept 'off-book' to enable or conceal improper payments.

You must not (and must not help others to) create, avoid creating, destroy or conceal any documents or records in order to conceal improper activity.

No payment will be made to a Business Partner without receipt of a detailed invoice that fully and accurately describes the services provided and expenses incurred. Any expense regarding a payment to a third party must be supported with a receipt. Prior to final review and approval of the invoice by the Reporting Officer and trustees, the Treasurer, or their delegate, will initially review the invoice and request an updated or corrected version if the invoice is unclear, insufficiently detailed, or appears to be inaccurate.

If the Treasurer, or their delegate, suspects that the invoice may include a bribe, facilitation payment or other improper payment, or evidence of unethical behaviour by the Business Partner, the Treasurer, or their delegate, will immediately refer the matter to the Reporting Officer to determine what steps should be taken. Where the roles of Treasurer and Reporting Officer are held by the same individual, the matter should be referred to the trustees to determine what steps should be taken.

No cash payments will be made to Business Partners other than payments from petty cash, which will be made as appropriate.

12. Mandatory Reporting; Safeguards Against Retaliation

If you suspect or become aware that someone – inside or outside the Foundation – may have offered, promised, given, authorised, requested, accepted or agreed to receive a bribe or facilitation payment of any amount in connection with the Foundation's business, you must immediately report this to the Reporting Officer, who will inform the trustees. If you believe that the Reporting Officer may be involved, you must report to the trustees directly. The trustees will ensure that the issue is investigated and that appropriate action is taken. You should not try to investigate the issue yourself.

Covered Persons who encounter a situation or are considering a course of action where the appropriateness is unclear should discuss the matter promptly with the Reporting Officer. Even the appearance of impropriety can be very damaging and should be avoided.

Covered Persons who are aware of other suspected or actual violations of this Policy (or any other applicable Foundation policies) by others have a responsibility to report it. Covered Persons are expected to promptly provide the Reporting Officer with a specific description of the violation that is believed to have occurred, including any information about the persons involved and the time of the violation. If you have reported the same issue before, or if you believe the Reporting Officer may be involved, you should report this promptly to the trustees.

The Reporting Officer will investigate all reported possible Policy violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances. No Covered Person may conduct any preliminary investigation, unless authorised to do so by the Reporting Officer. Cooperation by Covered Persons in the investigation will be expected. As needed, the Reporting Officer will consult with the trustees, Board of Advisors and/or external legal counsel.

Reports must be kept strictly confidential by the person making the report and its recipients, except as necessary to properly investigate the issues raised in the report. Unauthorised disclosure of the contents or nature of a report may result in disciplinary action.

Covered Persons should report without fear of any form of retaliation. The Foundation will take prompt disciplinary action against any director, advisor, officer, trustee, employee or volunteer who retaliates against a Covered Person, which may include termination of services.

We aim to encourage openness and will support anyone who raises or reports genuine concerns in good faith under this Policy, even if they turn out to be mistaken. However, deliberately false or misleading reports must not be made. Any such reports may result in disciplinary action.

13. Training and Communication

All Covered Persons will be provided with a copy of this Policy. Covered Persons will also be required to attend training on this Policy, and will receive periodic refresher training and / or additional training (e.g. for those in higher risk positions) as necessary.

A statement from the trustees regarding our commitment to conducting our operations in an honest and ethical manner will be posted on our website. Other steps will be taken as appropriate to communicate this commitment to donors, sponsors, suppliers, beneficiaries and other third parties.

This commitment, and in particular our zero-tolerance approach to bribery and corruption, must be explicitly drawn to the attention of Business Partners engaged by us. This may be done in connection with the contractual requirements referred to at paragraph 9 above.

14. Breaches of this Policy

Any director, advisor, officer, trustee, employee or volunteers who breaches this Policy will be subject to appropriate disciplinary action, up to and including dismissal.

Any Business Partner that is found or suspected to have breached this Policy, our ethical principles (or applicable laws, or to have otherwise failed to act with the level of integrity we expect, will be subject to appropriate remedial action, which may include termination of the engagement.

If serious illegality is suspected or identified, law enforcement authorities may be informed.

15. Responsibility for and Questions About this Policy

The Foundation’s trustees have overall responsibility for ensuring this policy is effectively implemented and complies with our legal and ethical obligations, and that all those under our control comply with it.

The Reporting Officer has primary and day-to-day responsibility for overseeing this policy, monitoring its use and effectiveness, dealing with any queries about it, and ensuring that those subject to it receive adequate training, commensurate to the risks identified.

You are ultimately responsible for reading, understanding and complying with this policy. If you do not understand anything in this policy, speak to the Reporting Officer to ensure that you are clear about what you should and should not do. The Reporting Officer can be reached by email at management@romildamorfoundation.org.

September 2025



.....

Romilda Dompfeh, Esq.
Founder of ROMILDAMOR Foundation