



ANTI-CORRUPTION POLICY

DICKINSON GROUP OF COMPANIES (DGC)

FOREWORD FROM THE CHAIRMAN

Since our founding in 1910, the Dickinson Group of Companies (DGC) has upheld a steadfast commitment to conducting business with integrity, professionalism, and respect for the rule of law. As a family-owned and professionally managed organisation spanning 115 years, we recognise that our continued success depends not only on the quality of our services but also on the strength of our ethical foundations. In a world where corruption undermines social development and economic stability, DGC reaffirms its zero-tolerance approach to all forms of bribery, blackmail, extortion, and fraud. This policy reflects our ongoing pledge to lead with principle and protect the values that define us: People, Integrity, Trust, Service, and Innovation.

1. OUR ETHICAL COMPASS: WHY INTEGRITY MATTERS

At DGC, integrity is not a concept we occasionally reference - it is central to our culture and embedded in the decisions we make every day. Corruption, in any form, compromises fairness, distorts markets, weakens institutions, and erodes public trust. As we lead the way in asset integrity management and industrial solutions, we must equally lead in ensuring the integrity of our own practices. This policy is designed to guide our conduct, foster a climate of ethical vigilance, and align our behaviour with broadly accepted international principles and our own operational realities.

We understand that corruption is not always obvious or overt. It often emerges subtly- in the bending of rules, the ignoring of red flags, or the rationalisation of unethical behaviour under pressure. By embedding this policy deeply into our operational DNA, we ensure that our people are empowered not only to identify what is wrong but also to act confidently in doing what is right.

2. WHO THIS POLICY APPLIES TO

This Anti-Corruption Policy applies to all employees of DGC - whether permanent, temporary, or contract-based - as well as directors, executives, consultants, third-party agents, and service providers operating on our behalf. No one at any level of the organisation is exempt from these expectations. We are all custodians of our company's values.

It also applies to external stakeholders who represent DGC's interests. Whether engaging with a government official, negotiating with a supplier, or finalising a contract, every representative of DGC is expected to conduct themselves with transparency, honesty, and accountability. The standards outlined in this policy apply equally to internal and external relationships.

3. UNDERSTANDING CORRUPTION: WHAT WE MUST GUARD AGAINST

Corruption is the abuse of entrusted power for private gain. It undermines trust, affects morale, and corrodes the ethical fabric of an organisation. At DGC, we define corruption broadly and commit to recognising and addressing its various forms:

- **Bribery:** Offering or receiving anything of value to improperly influence a decision.

- **Blackmail:** Coercing another party by threatening to reveal damaging information.
- **Extortion:** Using intimidation or threats to gain something of value.
- **Fraud:** Intentionally deceiving to gain an unfair or unlawful advantage.
- **Conflict of Interest:** Allowing personal interests to interfere with professional responsibilities.

We emphasise that corruption may also be cultural or systemic in some environments. This does not excuse participation. Where practices contradict DGC's values, we must stand firm and set the tone for ethical leadership.

4. OUR COMMITMENTS: THE BOUNDARIES WE SET

DGC's stance on corruption is clear and unequivocal: zero tolerance. This principle governs our relationships with customers, suppliers, competitors, public officials, and all other stakeholders.

Our commitments include:

- Not offering, promising, or authorising anything of value that may be seen as an inducement.
- Not engaging in or tolerating coercive practices or abuse of influence.
- Avoiding relationships or activities that give rise to real or perceived conflicts of interest.
- Ensuring all business records, invoices, and documentation reflect genuine transactions.
- Responding swiftly and fairly to concerns raised by employees or third parties.

Our commitment also means that we choose long-term integrity over short-term gain. We will forgo business rather than compromise our values. This is a matter of principle and practice.

5. LIVING OUR VALUES THROUGH CONDUCT

DGC's values are more than words - they shape our decisions, behaviour, and leadership.

- **People:** We treat one another with respect, value diverse perspectives, and encourage open dialogue. Ethical conduct includes looking out for each other and speaking up when something seems wrong.
- **Integrity:** We take pride in doing what is right, not what is easy. Integrity is about honouring our word, meeting our obligations, and holding ourselves accountable.
- **Trust:** Trust is earned over time through consistent behaviour. At DGC, trust is central to every business relationship. Once lost, it is difficult to regain.
- **Service:** We aim to deliver value without compromise. This means being honest in our marketing, responsible in our execution, and fair in our pricing.
- **Innovation:** While we strive to be pioneers in industrial solutions, our innovation is always guided by ethical responsibility. We do not cut corners or misrepresent results.

6. RISK AWARENESS AND RED FLAGS

Corruption does not always present itself openly. Often, it hides behind vague arrangements, verbal promises, or unusual contractual terms. Key red flags to be aware of include:

- Vague scope of work or excessive consultant fees
- Requests to bypass established procedures
- Unwillingness to provide written documentation
- Pressure to approve deals without due diligence
- Gifts, hospitality, or entertainment with no clear business justification

Employees must remain alert, particularly in high-risk settings. Trust your instincts - if something feels wrong, it usually is.

7. SPEAKING UP AND REPORTING CONCERNS

All employees have a responsibility to uphold our ethical standards. When confronted with wrongdoing or suspicious conduct, silence is not an option. Concerns can be raised through:

- Line managers or supervisors
- Human Resources
- Senior leadership
- The Group HR Manager (who serves as DGC's Compliance Officer)

All reports are treated seriously and confidentially. We value honesty and protect individuals who come forward in good faith. Retaliation of any kind is strictly prohibited. Speaking up is not only permitted—it is expected.

DGC Fraud Hotline

To report suspected fraud, corruption, or unethical behaviour, employees may contact the dedicated DGC Fraud Hotline:

- **Email:** fraudhotline@dgc-africa.com
- **Group HR Manager (Compliance Officer):** ria@dgc-africa.com
- **Phone:** +27 82 376 2457

All reports will be treated confidentially and handled with the utmost professionalism. Employees may report concerns anonymously and in good faith without fear of retaliation.

8. BREACHES AND CONSEQUENCES

Breaches of this policy undermine our collective mission and values. Any confirmed breach may result in disciplinary action, including termination of employment or contracts. In certain cases, legal authorities may be notified. Our commitment to integrity is not subject to negotiation or compromise. Every employee, at every level, is equally accountable.

9. TRAINING AND EMPLOYEE AWARENESS

To promote a consistent understanding of this policy, all new employees will be introduced to the policy during onboarding. Periodic briefings and toolbox talks will reinforce the key principles. Awareness is more effective than documentation alone. Supervisors and managers are encouraged to integrate discussions of ethical conduct into team meetings, one-on-ones, and performance evaluations. The goal is to make ethical behaviour second nature, not a formality.

10. STEWARDSHIP AND ACCOUNTABILITY

At DGC, we recognise that the tone is set at the top. Senior leaders are not only responsible for compliance but for modelling the values we expect from others. Accountability begins with leadership. This policy is not about complexity. It is about clarity. It is not meant to be intimidating, but empowering. It is a tool for enabling our employees to act in alignment with the company's legacy and vision.

11. ROLES AND RESPONSIBILITIES

- **Board of Directors:** Provides strategic oversight and ensures alignment with governance standards.
- **Senior Management:** Demonstrates daily commitment and facilitates implementation across the business.
- **Group HR Manager (who serves as DGC's Compliance Officer):** Serves as a resource for interpretation, awareness, and coordination of investigations.
- **Employees:** Apply ethical judgement, follow policy guidelines, and raise concerns proactively.

Each of us has a role to play. Upholding this policy is a shared responsibility that begins with awareness and results in action.

12. WHISTLEBLOWING AND PROTECTION OF REPORTERS

DGC fosters a speak-up culture. If you witness misconduct, we want to hear about it. Our processes are intentionally designed to be simple and informal.

We respect anonymity where requested, and we do not require written submissions.

Reports can be made in any format, including verbal discussion, and to any senior leader you trust.

Employees who raise concerns will not be disadvantaged. Their courage in speaking out is recognised as a contribution to our culture of integrity.

For ease of access, employees are encouraged to use the DGC Fraud Hotline as a first point of contact for confidential reporting.

13. PRACTICAL IMPLEMENTATION AND COMMUNICATION

This policy is embedded into the practical life of our company. We aim for simplicity, accessibility, and clarity over bureaucracy.

- It is included in onboarding packs and referenced in employment agreements.
- It is discussed in leadership meetings and training sessions.
- It is made available in all operating languages across DGC sites.
- It is a living reference point for how we behave—not a document that gathers dust.

Managers are encouraged to use real-life examples to explain how the policy applies to daily situations. Contextual clarity strengthens application.

14. MONITORING AND REVIEW

Rather than impose routine updates, this policy will be reviewed on an as-needed basis. If material risks or external changes arise, we will revise it accordingly. We will also reflect on feedback from our employees to improve clarity and effectiveness.

The focus is on ongoing relevance, not administrative cycles. Any proposed updates will be reviewed by senior leadership and communicated in a timely and transparent manner.

15. ANNEXES AND SUPPORTING MATERIALS

To assist employees in applying the policy, the following supporting materials are provided:

ANNEX A – Common Red Flags and How to Respond

ANNEX B – Guidance on Gifts, Hospitality and External Interactions

ANNEX C – Frequently Asked Questions for Employees

ANNEX D – Summary of Applicable Ethical Standards and Commitments

APPROVED BY:



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SMAPLE RED FLAGS IN BUSINESS TRANSACTIONS & HOW TO RESPOND

Corruption often hides behind seemingly routine business activities. While not every irregularity is evidence of misconduct, the presence of certain red flags may suggest unethical or illegal behaviour and should prompt further inquiry. DGC employees are expected to exercise sound judgement and escalate concerns when red flags arise. This annex provides a detailed reference guide to assist in identifying and responding to such indicators.

1. THIRD PARTY DUE DILIGENCE CONCERNS

Third parties acting on DGC's behalf - such as consultants, agents, service providers, or intermediaries - can pose significant corruption risks. Be alert to the following:

- The third party is reluctant to disclose ownership, affiliations, or relevant background information.
- The third-party lacks experience or qualifications but is recommended for high-value contracts.
- The third party insists on secrecy or informal arrangements without written contracts.
- The third party proposes unusual payment terms, such as use of offshore accounts or cash transactions.
- The third party has been previously associated with corruption allegations, litigation, or government sanctions.

2. UNUSUAL OR SUSPICIOUS PAYMENT PRACTICES

Corruption may be concealed in how payments are requested, processed, or recorded. Red flags include:

- Requests for payments to be made to accounts unrelated to the contracting entity.
- Payments requested in currencies not relevant to the transaction.
- Invoices that are vague, lack detail, or are unsupported by documentation.
- Requests to split invoices or inflated amounts to include hidden fees or commissions.
- Unjustified urgency or secrecy surrounding payment processing.

3. PROCUREMENT AND CONTRACTING IRREGULARITIES

Fraud and corruption can also occur through manipulation of procurement and contracting processes. Look for:

- Limited or no competitive bidding despite contract value or strategic importance.
- Contracts awarded to the same vendor repeatedly without review or performance evaluation.
- Unjustified sole-source or emergency procurement designations.
- Sudden contract changes in scope, pricing, or deliverables after award.
- Suppliers insisting on verbal agreements or last-minute approvals.

4. INAPPROPRIATE GIFTS, HOSPITALITY, OR SPONSORSHIPS

Gifts and entertainment can be used to influence business decisions. Watch for:

- Lavish or frequent hospitality that is not proportionate to the relationship.
- Gifts or hospitality offered during procurement, audits, or licensing decisions.
- Invitations to entertainment events with no business rationale or without DGC representation.
- Attempts to conceal or avoid disclosure of gifts or hospitality.

5. ENGAGEMENTS WITH GOVERNMENT OR REGULATORY OFFICIALS

Working with public officials requires heightened diligence. Red flags include:

- Requests for facilitation payments to expedite permits, inspections, or services.
- Unexplained access to government officials through intermediaries.
- Frequent informal meetings without documentation or agendas.
- Officials recommending specific vendors or consultants without competitive processes.

6. BEHAVIOURAL WARNING SIGNS

Ethical concerns are often accompanied by observable behavioural cues. Be cautious if:

- Individuals are evasive or defensive when asked for supporting documents.
- Employees discourage the involvement of legal or compliance teams.
- There are efforts to bypass internal controls or recordkeeping procedures.
- Staff members claim “this is how it’s done here” to justify non-compliant behaviour.

7. GEOGRAPHIC OR SECTOR RISK FACTORS

Certain markets or sectors may inherently carry higher corruption risks. Use enhanced caution when:

- Operating in countries with weak governance or transparency frameworks.
- Working in sectors known for corruption risk (e.g., construction, mining, customs, or procurement).
- Engaging intermediaries to win government business or access permits.

8. BRIBERY, BLACKMAIL, AND EXTORTION RISKS

These severe forms of corruption require immediate attention and zero tolerance. Red flags include:

- Individuals offering money, favours, or benefits in exchange for business decisions or contracts.
- Suggestions to pay unofficial fees to influence an outcome.
- Threats to reveal damaging information or create reputational harm unless demands are met.
- Requests for payment or favour under coercion or implied consequences.
- Disguised offers or exchanges made under the guise of ‘urgent support’ or ‘friendly arrangements.’

These behaviours often manifest subtly at first - through vague promises, implied expectations, or manipulative language - and may escalate if unaddressed. DGC employees must immediately report such conduct.

RESPONSE AND ACTION

When a red flag is identified, the appropriate response depends on the nature and severity of the concern:

- Pause the transaction or decision where possible.
- Collect and document any relevant information or observations.
- Report the matter to your line manager or the Group HR Manager (who serves as DGC’s Compliance Officer).
- Do not conduct your own investigation or confront the suspected party directly.

Prompt escalation protects you, your colleagues, and the company. Acting early reduces reputational risk and supports the ethical culture we aim to sustain.

GUIDANCE ON GIFTS, HOSPITALITY AND EXTERNAL INTERACTIONS

This annex provides detailed guidance on how to manage the giving and receiving of gifts, entertainment, hospitality, and other external engagements. These practices, while often part of professional and cultural norms, can create the risk of undue influence or perceived impropriety if not carefully managed.

1. GENERAL PRINCIPLES

All forms of gifts and hospitality must:

- Serve a legitimate business purpose.
- Be modest, infrequent, and culturally appropriate.
- Not influence or appear to influence business decisions.
- Be transparent and, where required, disclosed to management or the Group HR Manager (who serves as DGC's Compliance Officer).
- Avoid creating any real or perceived conflict of interest.

2. ACCEPTABLE PRACTICES

The following practices are generally acceptable under this policy:

- Occasional business meals or refreshments of modest value where DGC is represented.
- Promotional gifts such as branded notebooks, pens, or calendars that carry nominal value.
- Cultural or ceremonial gifts that are not extravagant and reflect local traditions.
- Token expressions of gratitude for public speaking or participation in conferences.

3. UNACCEPTABLE PRACTICES

These examples are never acceptable and violate DGC's anti-corruption standards:

- Gifts or hospitality offered during or near tender evaluations, licensing decisions, or contract negotiations.
- Cash or cash-equivalent gifts, including gift cards or pre-paid vouchers.
- Lavish or frequent entertainment, such as luxury travel, exclusive sports events, or fine dining that is not directly tied to business activity.
- Benefits offered in exchange for a favour or to expedite a government process.
- Concealing gifts or failing to report them when required.

4. TRAVEL AND ACCOMMODATION

Providing or accepting travel and accommodation may be permitted when:

- It is directly related to business purposes such as a plant visit or client meeting.
- Costs are reasonable and necessary, and travel itineraries are not excessive.
- The arrangement is pre-approved by a manager and documented in advance.
- It does not include leisure activities funded by the host company.

The travel of family members or personal guests should not be covered by DGC or accepted from third parties.

5. SPECIAL GUIDANCE FOR ENGAGING WITH PUBLIC OFFICIALS

Interactions with government officials require heightened scrutiny:

- Any form of gift or hospitality must be approved in advance by the Group Compliance Officer.
- All expenses must be transparently documented and recorded.
- Even small gestures may be considered inappropriate under local laws or DGC policies.
- Employees must not attempt to influence, reward, or gain favour through any benefit.

6. DECLARATIONS AND RECORD-KEEPING

Employees are required to declare gifts or hospitality offered or received that may exceed modest norms, particularly when offered repeatedly or by the same individual or organisation. The following should be documented:

- Nature and estimated value of the item or hospitality.
- Purpose and timing of the offer.
- Relationship to the business activity or decision.
- Approval or guidance received, if applicable.

Declarations should be made to line managers or directly to the Group HR Manager (who serves as DGC's Compliance Officer).

7. CULTURAL SENSITIVITY AND SOUND JUDGEMENT

We acknowledge that in many regions, exchanging gifts or hosting business meals is customary. However, cultural sensitivity must never be used to justify actions that conflict with our values or ethical commitments. When in doubt, ask the following:

- Would I be comfortable if this appeared in a news report?
- Could this influence my or someone else's decision-making?
- Would this be acceptable if the roles were reversed?
- If the answer to any of these questions is "no" or uncertain, seek guidance before proceeding.

Maintaining transparency, acting with integrity, and exercising sound judgement are the best safeguards against conflicts of interest and reputational harm.

FREQUENTLY ASKED QUESTIONS FOR EMPLOYEES

This section addresses common queries raised by DGC employees when navigating the expectations set out in our Anti-Corruption Policy. These questions are designed to help employees make confident, informed decisions in line with our values and commitments.

1. WHAT SHOULD I DO IF I SUSPECT A COLLEAGUE IS INVOLVED IN CORRUPT ACTIVITY?

If you have reason to suspect misconduct, you must report it as soon as possible. You can report concerns to your line manager, senior leadership, or directly to the Group HR Manager (who serves as DGC's Compliance Officer). All concerns are treated confidentially and investigated appropriately. DGC does not tolerate retaliation against whistleblowers.

2. AM I ALLOWED TO ACCEPT A SMALL GIFT FROM A SUPPLIER?

You may accept modest, infrequent gifts (such as a pen or calendar) that are offered openly and without any expectation of favour. If you are unsure whether a gift is appropriate, discuss it with your manager or the Group HR Manager (who serves as DGC's Compliance Officer).

3. A CLIENT HAS INVITED ME TO A SPORTS EVENT. CAN I ATTEND?

Attendance is generally acceptable if the event has a clear business purpose, is not extravagant, and DGC representatives are present. However, approval from your manager is required. Avoid attending events that coincide with tenders or contract renewals.

4. WHAT ARE 'FACILITATION PAYMENTS' AND ARE THEY ALLOWED?

Facilitation payments are small unofficial payments made to secure or speed up routine government actions (e.g., customs clearance). These are strictly prohibited under DGC's policy, even if they are considered normal in certain countries.

5. A THIRD-PARTY AGENT INSISTS ON RECEIVING PAYMENT INTO A PERSONAL ACCOUNT. WHAT SHOULD I DO?

This is a red flag. Payments should only be made to business accounts of verified entities. Escalate the matter immediately to your line manager or the Group HR Manager (who serves as DGC's Compliance Officer) for review.

6. I AM WORKING IN A COUNTRY WHERE BRIBERY IS COMMON PRACTICE. HOW SHOULD I ACT?

Cultural norms do not override DGC's zero-tolerance stance. Uphold the company's values at all times and report any pressure to act unethically. Support is available from leadership and compliance representatives.

7. I RECEIVED A VERBAL INSTRUCTION FROM A SENIOR MANAGER THAT FEELS UNETHICAL. WHAT NOW?

Even senior leaders are bound by our policies. If you believe an instruction violates DGC's values or ethical standards, you should raise the matter discreetly with a trusted senior colleague or report it through official channels.

8. I AM AFRAID OF BEING PENALISED FOR REPORTING A CONCERN. WHAT PROTECTION DO I HAVE?

DGC's whistleblower protections ensure that employees who report concerns in good faith are not subject to dismissal, demotion, or any form of retaliation. We encourage openness and appreciate the courage it takes to speak up.

9. WHAT IS CONSIDERED A ‘CONFLICT OF INTEREST’?

A conflict arises when your personal interests interfere - or appear to interfere - with your responsibilities to DGC. This could include hiring a relative, owning shares in a competitor, or accepting undisclosed benefits. Such conflicts must be disclosed and managed.

10. HOW OFTEN IS TRAINING PROVIDED ON THIS POLICY?

Anti-corruption awareness is embedded into employee onboarding and reinforced through regular team briefings, discussions, and operational check-ins. Ongoing support is always available via the Group HR Manager (who serves as DGC’s Compliance Officer).

11. WHAT SHOULD I DO IF A SUPPLIER INVITES ME TO A SOCIAL EVENT OUTSIDE BUSINESS HOURS?

You may attend if the event is modest, appropriate, and approved in advance by your manager. However, extra caution is needed if the event coincides with commercial negotiations or could be seen as influencing decision-making.

12. IS IT ACCEPTABLE TO OFFER SMALL GIFTS DURING THE FESTIVE SEASON?

Yes, provided the gifts are modest, culturally appropriate, and not excessive. Avoid offering gifts during contract discussions or tenders. All festive gestures must reflect respect and goodwill, not obligation.

13. WHAT IF SOMEONE CONTACTS ME VIA WHATSAPP OR PERSONAL EMAIL OFFERING A ‘FAVOUR’ IN RETURN FOR BUSINESS?

Such communications are highly inappropriate and likely a red flag. Save the message, do not engage further, and report it to your manager or the Group Compliance Officer. All business correspondence should remain professional and traceable.

14. CAN CHARITABLE DONATIONS OR SPONSORSHIPS CREATE CORRUPTION RISKS?

Yes. While DGC supports social impact, donations must never be made to secure business advantage or curry favour with decision-makers. All charitable giving must be transparent, approved, and not tied to contracts or public sector influence.

15. I AM A JUNIOR EMPLOYEE AND UNSURE HOW TO RAISE A CONCERN RESPECTFULLY. WHAT DO YOU SUGGEST?

Start by speaking with a manager you trust or someone in Human Resources. Use factual language such as “I noticed something unusual...” or “Can I get clarity on this process?” If uncomfortable, reach out to the Group HR Manager (who serves as DGC’s Compliance Officer) confidentially. Your voice matters, regardless of position. If you have any questions not addressed here, please reach out to your line manager or contact the Group HR Manager (who serves as DGC’s Compliance Officer).

Reports may be submitted anonymously and will be handled with professionalism and discretion.

SUMMARY OF APPLICABLE ETHICAL STANDARDS AND COMMITMENTS

The Dickinson Group of Companies (DGC) is committed to maintaining the highest standards of ethical conduct and business integrity. As a family-owned, professionally managed company with a legacy spanning over a century, we recognise that sustained success is built on the trust of our stakeholders. This Annex outlines the ethical frameworks, principles, and standards that underpin our Anti-Corruption Policy.

1. DGC CORE VALUES

Our values serve as the moral compass for our decisions and interactions. They are actively lived, not just stated:

- **People** - We prioritise dignity, safety, and respect. We expect our employees to support one another in making ethical decisions, even when under pressure.
- **Integrity** - We hold ourselves accountable to the highest moral standards. Integrity means doing the right thing when no one is watching.
- **Trust** - Trust is earned through consistent, honest, and fair dealings. Every employee is entrusted to safeguard DGC's reputation in their conduct.
- **Service** - We deliver excellence to our clients by integrating integrity into every service we offer. Service is never an excuse for cutting corners.
- **Innovation** - We solve problems creatively but responsibly. Innovation must not undermine compliance or transparency.

2. INTERNATIONAL ETHICAL STANDARDS

Our approach to anti-corruption aligns with several leading global standards:

- **United Nations Global Compact (UNGC)** - We fully embrace Principle 10, which urges companies to fight corruption in all forms. We apply this in procurement, client relations, internal decisions, and supply chain engagements.
- **United Nations Convention against Corruption (UNCAC)** - We adopt UNCAC principles of prevention, enforcement, asset recovery, and international cooperation.
- These influence our internal controls, whistleblower protection, and recordkeeping requirements.
- **OECD Convention on Combating Bribery** - We align our practices with the prohibition against bribery of foreign officials. This extends to how we manage agents, joint ventures, and overseas engagements.
- **ILO Declaration on Fundamental Principles and Rights at Work** - We integrate ethical labour practices into our operations. Exploitative labour is incompatible with our integrity objectives.

3. REGIONAL AND LOCAL LEGAL COMMITMENTS

As a Pan-African organisation, DGC complies with and supports:

- **African Union Convention on Preventing and Combating Corruption** - We promote ethics in both the public and private sectors. We support procurement transparency, reject influence peddling, and insist on competitive fairness.
- **South African PRECCA (Prevention and Combating of Corrupt Activities Act)** - We ensure compliance with the obligation to prevent, detect, and report corruption.
- **Zambian Anti-Corruption Commission Act and DRC Anti-Corruption Law** - We adhere to all host country regulations, including requirements for public tenders, transparency in hiring, and project execution.
- **Country-Specific Codes of Conduct** - We integrate compliance expectations with labour, tax, environmental, and governance laws in each country where we operate.

4. INTERNAL GOVERNANCE AND ETHICAL CULTURE

Ethical standards must be embedded in our day-to-day operations:

- **Code of Conduct** - Our Code sets clear expectations for honesty, fairness, and responsibility in every transaction.
- **Internal Controls** - We apply checks and balances in payments, procurement, and third-party engagement.
- **Ethics Training** - We offer ongoing reinforcement through team briefings, toolbox talks, and onboarding.
- **Speak-Up Culture** - All employees are encouraged to voice concerns without fear.
- **Silence enables corruption** - openness stops it.

5. SPECIFIC EMPLOYEE COMMITMENTS

Every employee of DGC is personally responsible for:

- Declining, reporting, and not soliciting bribes.
- Refusing facilitation payments - even when common in the region.
- Maintaining transparent, auditable records.
- Disclosing relationships or benefits that might create a conflict of interest.
- Avoiding the misuse of company assets for personal gain.
- Participating actively in training and awareness sessions.

These expectations are not advisory - they are a condition of employment and critical to DGC's mission.

6. ACCOUNTABILITY OF LEADERSHIP

DGC's leaders are expected to model our values visibly and consistently. This includes:

- Setting a tone of integrity and transparency from the top.
- Taking corrective action when misconduct occurs.
- Protecting whistleblowers and encouraging ethical dialogue.
- Avoiding the appearance of favouritism or double standards.
- Ensuring that strategy and business planning reflect ethical commitments.

7. CONTINUOUS IMPROVEMENT AND ALIGNMENT

We review our practices regularly to remain aligned with evolving standards and stakeholder expectations. We also:

- Benchmark against best practices in the industry.
- Participate in external audits or reviews when appropriate.
- Share lessons learned across the Group from incidents or investigations.
- Engage with clients and partners to reinforce a shared commitment to ethical conduct.

DGC's Anti-Corruption Policy is not just about rules—it is about protecting our integrity, our people, and our future. This Annex affirms our collective responsibility to uphold and promote ethical standards that serve our business and society.

Reports may be submitted anonymously and will be handled with professionalism and discretion.