

ANTI-BRIBERY AND CORRUPTION POLICY



Introduction

The Executive Board of the Dawnus Group are fully committed to operating a zero tolerance policy to bribery and corruption. This principle supports the company ethic of undertaking our business in a scrupulously impartial and honest manner in all dealings in the UK and abroad.

The UK Bribery Act 2010 created offences and penalties for bribery and corruption, and a corporate offence of failing to prevent bribery. The Act requires companies to introduce 'adequate procedures' to prevent bribery.

This policy sets out the responsibilities of Dawnus staff and businesses in preventing bribery and how we will implement 'adequate procedures' to achieve this.

Definition

Dawnus defines bribery as the offering, promising, giving, accepting or soliciting of a payment, gift, favour or financial or other advantage to influence a business outcome improperly, or to induce or reward improper conduct.

Bribery and corruption can be direct or indirect through third parties such as agents, brokers, joint venture partners etc. Facilitation payments are bribes, even if they are legal or accepted practice in some countries.

Scope

The UK Bribery Act 2010 requires Dawnus to implement adequate procedures to prevent bribery by any person or organisation that acts for or on behalf of Dawnus.

This policy, and associated policy guideline, applies to every employee, contractor, director and officer in all the companies under the control of Dawnus.

It also applies to any third party service providers such as agents, consultants, intermediaries, contractors or suppliers who work on our behalf or in our name. All third parties will be required to act in accordance with this policy when acting on our behalf.

Policy Commitment

Dawnus does not tolerate any form of bribery or corruption.

- You must not offer, pay, make, seek or accept a bribe (as per definition).
- You must comply with the anti-bribery and corruption laws to which you and Dawnus are subject.
- Remember that UK bribery laws apply anywhere in the world.
- You must ensure that people who work for and with you and Dawnus understand that bribery and corruption is unacceptable.
- You are liable to disciplinary action, dismissal, legal proceedings, and potentially imprisonment if you become involved in bribery and corruption.
- You must comply with the Dawnus procedures for preventing bribery and corruption.

Adequate Procedures

Dawnus has made anti-bribery and corruption a key priority, with an Anti-Bribery Strategy agreed and endorsed by the Executive Board, who have expressed their commitment to this policy and the ongoing Implementation Plan.

The Adequate Procedures, Strategy and Implementation Plan follow 6 broad principles as follows:-

- **Top-Level Commitment** – All directors / senior managers will lead by example and foster a culture in which bribery is never acceptable.
- **Proportionate Procedures** – Policies will be clear, practical, accessible, effectively implemented and enforced. We will address the risks created by gifts and hospitality, sponsorship and donations through the enforcement of our internal policies.
- **Risk Assessment** – Regular Risk Assessments will be undertaken looking at our operations, people, geographical spread and structure, which will inform the priorities in terms of anti-bribery implementation and training.

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- **Due Diligence** – Our approach will be proportionate and risk based, and we will ensure that our due diligence procedures reflect the identified risk areas. Our third party business partners will be subject of due diligence, and if we decide they cannot be trusted to comply with our standards, then we will not do business with them.
- **Communication** – Policies and procedures will be embedded and understood by means of a training programme proportionate to risk and tailored to the role. Other means of communication will be used in between training programmes. External partners will be apprised of our standards and expectations.
- **Monitoring and Review** – We will maintain records of our compliance with this and other related policies. We will evaluate the effectiveness of our procedures and adapt them whenever necessary. We will ensure that staff are confident that they can speak up about potential malpractice. We will test our compliance with this and its related policies.

Responsibility

The Group Managing Director is the Board director with primary accountability for our anti-bribery and corruption efforts and shall report the results of our policy compliance at least annually to the Executive Board.

The Finance Director has primary responsibility for implementing the Anti-Bribery and Corruption Strategy, policy and process within Dawnus.

Regional / Departmental Directors are responsible for the effectiveness of the policy within their area of remit.

The HR Manager – Employment Policy and Practice is responsible for driving the Implementation Plan.

Raising Concerns and Seeking Guidance

The Company commitment to zero tolerance relating to bribery and corruption is dependent on all employees and third parties acting on our behalf supporting and promoting this culture. This will include recognising and reporting any act which may be considered to be unethical or dishonest.

The Dawnus Speaking Up policy encourages staff and our business partners to disclose instances of malpractice. Examples can include criminal acts, or any wrongdoing that could harm the organisation or persons working for or with it.

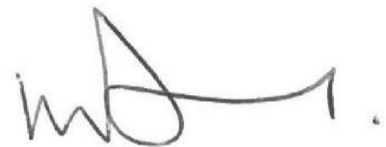
The process affords protection to those employees making a disclosure.

If you would prefer, you can make these reports anonymously.

Further detail on how to make a disclosure is available in the Company Speaking Up Policy.

In addition, if you are unsure whether to make a disclosure, or whether to do or not do something, then you should in the first instance consult with your manager. If you do not feel that this is appropriate, then make sure you speak to another manager, a director, or contact the HR Manager at Head Office.

(This policy should be read in conjunction with Policy Guidance Document [HR_GN_012](#).)



Nick Down
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Dawnus Group Ltd
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