



DX (Group) plc Anti-Corruption and Bribery Policy

At DX, it is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. The purpose of this policy is to provide information and guidance to colleagues, individuals and companies working with or for us in the provision of services.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if DX were found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore have a vested interest in ensuring all of our colleagues and those who interact with our business are aware of the Bribery Act offences and bribery and corruption are listed as Gross Misconduct issues within the DX Disciplinary Policy.

Those working with or for DX are prohibited from offering, promising, giving, soliciting, arranging or accepting bribes intended for their benefit or for the benefit of their family, friends, associates or acquaintances, to any business partner. This policy also includes actual and potential clients, Customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties, and our (DX) relationship with them.

DX expects a high level of commitment in the implementation of suitable Anti-corruption and Bribery prevention policies. As such, DX will avoid doing business with businesses without adequate due diligence procedures in place. Effective financial and audit controls will be implemented and maintained in order to identify any potential and actual irregularities.

Gifts and Hospitality

This policy does not prohibit normal and appropriate hospitality that are given and received and we accept that the giving and acceptance of gifts and benefits can be part of building normal business relationships. However, doing so does raise possible conflicts between professional duties and personal interests. In some instances, may even be illegal. All DX colleagues are under an obligation to refuse all but the most minimal of gifts, and disclose any offer or gifts and hospitality to DX on an internal gift register, which is held on the DXchange.

Facilitation payments and kickbacks

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are generally defined as small, unofficial payments used for the purpose of expediting or facilitating routine government action by a government official. Kickbacks are bribes made in return for a Company to gain. DX Colleagues must not get involved in any action that might bring about, or suggest, that a facilitation payment or kickback will be made or accepted by DX.

Donations

DX supports charities and local communities through donations and fundraising events. We only make charitable donations that are legal and ethical. No donation must be offered or made without the prior approval of a member of the Management Board.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future.

Record keeping

DX is obliged to keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties, and other audit records.

Colleagues are asked to raise any suspicions or concerns with their manager, Human Resources or any member of the Management Board, and may request additional details from other parties for the reasons for any payments. Colleagues may also use the Whistle Blowing policy, in confidence to notify DX of any suspicions or concerns.

If you are in doubt about any of the information contained within this policy please speak to your line manager, or for external parties your DX contact. As a reminder should you need to report an act of bribery you can call the Whistle Blower hotline number on 01604 782 846 in confidence.