

Introduction:

The Executive Board of the DIG International Group Ltd (DIG IG) 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 DIG IG staff and businesses in preventing bribery and how we will implement 'adequate procedures' to achieve this.

Definition:

DIG IG 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 DIG IG to implement adequate procedures to prevent bribery by any person or organisation that acts for or on behalf of DIG IG.

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

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:

DIG IG 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 DIG IG are subject.
- Remember that UK bribery laws apply anywhere in the world.
- You must ensure that people who work for and with you and DIG IG 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 DIG IG procedures for preventing bribery and corruption.

Adequate Procedures:

DIG IG 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.
- **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 Director UK 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 Director UK has primary responsibility for implementing the Anti-Bribery and Corruption Strategy, policy and process within DIG IG. 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 DIG IG Speaking Up Policy ([HR_PL_002](#)) 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.

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 [FIN_GN_002](#).

This policy is communicated to all employees and is available to the public and interested parties.



Director
DIG International Group Ltd
5th September 2019

Introduction:

DIG IG is committed to upholding the highest standards of honesty and integrity.

All persons employed by DIG IG must expect appropriate behaviour from colleagues and our Interested Parties. They should also be comfortable in the knowledge that they can report instances of malpractice without fear of reprisals.

Purpose:

If an employee has a concern that something might not be in accord with our company ethics and values, then they need to know that we want them to speak up.

This policy describes the options open to them, the communication channels, and the reassurances that they will be taken seriously and supported.

Scope:

For the purposes of this policy, the term 'employee' means employees (whether fixed term, permanent or temporary), directors, officers and other individuals working for the Company such as contractors and agency workers. It also applies to Interested Parties, whether our business partners and those who act on our behalf, such as consultants, agents and all other third parties.

Commitments:

In support of the Company's commitment and the Board's expectations, the Company seeks to maintain a culture of openness and accountability, such that prompt action can be taken to address any illegal or unethical conduct involving DIG IG or any of its employees. DIG IG will not tolerate attitudes or activities that constitute a breach of our policies, code of conduct, the law or trust, or otherwise fall below the highest standards of business conduct and personal behaviour.

This Speaking Up policy formalises the Company's procedure to enable any employee to make fair and prompt disclosure of any circumstances where the employee genuinely and reasonably believes that the Company and/or any employee is engaged in any activities or practices which fail to meet the highest standards of business conduct and personal behaviour. This process is also sometimes referred to as whistleblowing.

The aims of this policy are:

- i) To make employees aware that:
 - Genuine and reasonable suspicions of illegal or unethical activities or inappropriate practices should be reported as soon as possible;
 - Any concerns will be taken seriously;
 - Any allegations will be thoroughly investigated and action taken as appropriate;
 - Confidentiality will be respected.
- ii) To provide employees with guidance as to how to raise any concerns
- iii) To support employees and reassure them that:
 - They are able to raise genuine and reasonably held concerns in good faith without fear of reprisals, even if they turn out to be mistaken;
 - They will be protected against victimization.

What types of information to disclose:

Any information which relates to suspected activities or practices which fall below the highest standards of business conduct and personal behaviour expected of all DIG IG employees should be disclosed under the Speaking Up policy. This may include:

SPEAKING UP POLICY

- Bribery and corruption;
- Any other criminal activity;
- Dangers to health and safety;
- Damage to the environment;
- Failure to comply with any legal or regulatory requirements;
- Financial fraud or mismanagement;
- The deliberate concealment of any of the above matters.

The above list is not exhaustive and employees should not be discouraged from making any disclosure of concerns that they may have simply because those concerns do not fall within the categories identified.

When to make a disclosure:

Employees are encouraged to use their judgment prior to raising any concerns under the Speaking Up policy.

Employees do not need absolute proof of their suspicions, but those suspicions should be genuine and based on a reasonable belief of the relevant circumstances.

Any disclosures should be made in good faith. You do not have to be right or have proof – you just have to believe the information you provide is correct.

The Company's commitment is to maintaining honesty and integrity. Employees must be aware therefore that if they make a false report in bad faith they may face disciplinary action.

How to make a disclosure:

In the first instance, employees are encouraged to raise any concerns requiring disclosure with their line manager or other management within their immediate working environment.

If employees feel that they need to raise the issue outside of their immediate working environment at any time, they are encouraged to contact a Director, or they can call the HR Manager on **07747 857532**.

Internal Action:

All complaints will be reviewed immediately, and the Company will aim to acknowledge receipt of any complaints received within two working days and then aim for an initial investigation report to be made within five working days.

It would not normally be appropriate for an employee to discuss these concerns outside the Company or to a third party unless the procedures detailed in this policy have first been followed. In any event, an employee who disregards this policy and makes a disclosure to a third party where it is not appropriate to do so may be in breach of confidentiality duties owed to the Company (which may lead to disciplinary action being taken) and may lose their statutory protection for raising concerns.

How the company will respond:

DIG IG will arrange for the proper and appropriate investigation of any disclosures made by any employee under the Speaking Up policy. Investigations will be conducted promptly and fairly with due regard to the nature of any allegations and the rights of the individuals subject to the allegations.

The Company will advise the employee responsible for making the disclosure of the findings of the investigation and any actions to be taken as a result.

Confidentiality and Protection from Reprisals:

SPEAKING UP POLICY

DIG IG is committed to ensuring that employees feel able to raise concerns openly in good faith under the Speaking Up policy without fear of victimisation and with the support of the Company. Legally, the Public Interest Disclosure Act 1999 affords employees legal protection against being dismissed or penalised by employers as a result of disclosing serious concerns.

The Company will take all reasonable steps to ensure the employee does not suffer any disadvantage in the workplace as a result of speaking up about concerns.

DIG IG will ensure that:

- Investigations will be carried out expeditiously
- Confidentiality will be respected
- Anonymous disclosures will be assessed for credibility

DIG IG is committed to ensuring that any disclosures are thoroughly investigated and appropriate actions taken to address any issues arising from that investigation. If any employee is dissatisfied with the manner in which their concern has been handled then they should write to the CEO at DIG IG Head Office.

This policy is communicated to all employees and is available to the public and interested parties.



Director
DIG International Group Ltd
5th September 2019