

Anti-Bribery & Corruption Statement

Davies conducts 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, wherever we operate, implementing and enforcing effective systems to counter bribery.

Purpose

Davies will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we conduct business including, but not exclusively, the Bribery Act 2010, which applies to conduct both in the UK and abroad, The Criminal Justice (Corruption Offences) Act 2018 in Ireland, and 18 USC Section 201, and the Foreign Corrupt Practices Act of 1977 (FCPA) in the United States.

Scope and Applicability

This statement applies to all individuals working for or on behalf of Davies, including all subsidiaries and their employees, contractors, and sub-contractors, regardless of location or business unit.

We expect all third parties to also adhere to the relevant laws and regulations surrounding bribery and corruption, and to escalate any issues, breaches or incidents, if identified.

Bribery and Corruption

Bribery is defined as an inducement or reward offered, promised, or provided in order to improperly gain any commercial, contractual, regulatory, or personal advantage, which may constitute an offence under the Act, namely:

- giving or offering a bribe;
- receiving or requesting a bribe; or
- bribing a foreign public official.

Davies may also be liable if it fails to prevent bribery by an associated person (including, but not limited to employees) for Davies benefit.

Corruption refers to the abuse of public or private office for personal gain.

Politically Exposed Person

A Politically Exposed Person (PEP) is defined as an individual who holds or has held in the last 12 months a role within a prominent public function, either domestically or in a foreign country. This

also includes anyone working in a prominent function in an international organisation, as well as an individual or family member, or close associate of a PEP.

PEP's present a higher risk of bribery and corruption since they may have vital information and funds to offer.

Gifts and Hospitality

Davies understands that gifts and hospitality exist and have specific internal policies which provide protection and guidance to employees as to what is regarded as normal and appropriate gifts and hospitality.

We keep appropriate financial records and have internal controls in place which evidence the business reason for gifts, hospitality and payments given and received.

Charitable Donations and Sponsorship

Davies only makes charitable donations and provides sponsorship that are legal and ethical under local laws and practices and which are in accordance with Davies internal policies and procedures.

Political Donations

Davies does not make any contributions to political parties, either directly from Davies or on behalf of clients.

Facilitation Payments

Davies does not allow its employees to make, or accept, facilitation payments of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official and are illegal under UK law.

Money Laundering

Davies ensures staff are made aware of risks of money laundering which describes the techniques, procedures or processes used to convert illegal funds obtained from criminal activities into other assets in such a way as to conceal their true origin, so that it appears that the money came from a lawful source.

Supplier Management

Davies undertakes due diligence checks on all third party suppliers, contractors and sub-contractors to ensure that they have an effective Anti-Bribery & Corruption Policy in place, along with appropriate internal controls.

Training and Communication

Davies applies a zero-tolerance approach to bribery and corruption, and we ensure all our employees receive annual training around this topic. Training is also provided for all new

employees as part of their on-boarding process. Additional bespoke training is provided to individuals who work in roles that are deemed of higher risk in terms of bribery and corruption.

Monitoring and Review

As part of the oversight framework within Davies, we undertake regular review of the policy, controls, and their effectiveness. Any improvements identified are implemented as soon as possible.

Regular reporting is also provided to our board members.

Responsibilities and Raising Concerns

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control.

Employees are required to notify Davies Compliance as soon as possible if they are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

Any employee who breaches the policy may face disciplinary action. We also reserve our right to terminate our contractual relationship with any third party who may be in breach of our policy. If any third party is aware of any activity by any employee which might lead to, or suggest, a breach of this policy, they should raise their concerns with Davies Compliance department at compliance.department@davies-group.com

Speak Up

As part of our Speak Up Policy, Davies confirms that no employee will be punished or subjected to any detriment by reason of having made a disclosure in good faith. Any harassment, victimisation, or less favourable treatment of any person on such grounds will be treated as a matter to be investigated under the internal Conduct & Capability Policy.

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