

Confidentiality: Public

Global Anti-Bribery and 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.

To support and promote good governance globally, Davies Group operates a Global Policy Framework made up of global statements, global policies, global policy supplements, and local policies.

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

This statement applies to all directors, officers, employees, consultants, and contractors whether permanent, fixed-term, or temporary, when they are working for, or providing services to, any Davies entity globally. This including those of any Appointed Representative of a Davies entity where this policy applies to the principal firm.

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 Global Anti-Bribery & Corruption Policy in place, along with appropriate internal controls.

Prevention and Reporting

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 Group Governance as soon as possible via email at GroupGovernance@davies-group.com 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.

Staff Competency and Training

All members of staff are expected to keep their knowledge of relevant requirements and procedures related to this statement and associated policy suites up to date.

It is the responsibility of each member of staff to ensure that they complete relevant training to maintain their individual competence. Each line manager is responsible for ensuring that their teams have access to, and can complete, such relevant training as their roles require. This is reflected in annual performance review scoring.

Policy Governance and Oversight

Davies is committed to ensuring good corporate governance and internal controls globally, and as part of the global policy framework within Davies, our Group Governance function undertake regular monitoring review of our policies, controls and their effectiveness.

All documents with the Global Policy Framework include requirements to ensure good governance and proper oversight.

Responsibilities

Employees, suppliers, and all other relevant parties whom this statement applies to are invited to familiarise themselves with their responsibilities and ensure these are being adhered to on an on-going basis.

Compliance with Davies Group policies is a mandatory requirement. Deviations or non-compliance with this Policy, including attempts to circumvent the stated policy/process by bypassing or knowingly manipulating the process, system, or data may result in disciplinary action, up to and including termination of employment, civil action and lawsuits, or referral for criminal prosecution, as allowed by local laws.

Queries and Raising Concerns

We welcome any queries or comments in relation to this statement and any such queries regarding the statement can be raised with Group Governance via email to GroupGovernance@davies-group.com.

Should you have any concerns about this statement and its requirements, these can also be raised with Group Governance, alternatively, you can refer to the Global Speak Up policy if it is more appropriate.

Speak-up Notice

All applicable concerns raised in line with the Davies Global Speak Up Policy will be investigated accordingly and inaction by management of a qualifying disclosure will not be tolerated.

We confirm 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 not be tolerated and will be investigated and escalated accordingly.

Document Control

Version	3
Effective Date	31-Oct-2023
Policy Owner	Group Governance
Approved By	James Heath, Group Chief Risk Officer

This document is subject to annual periodic review and may also be subject to ad hoc review. The latest version of this document will be published on the Group Intranet and available from Group Governance on request.

The review process and audit history for this document is managed on the Group Policy Management Platform. Document review and approval audit history can be provided by Group Governance on request.