

Global Anti-Bribery and Corruption Statement



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As a global organisation, Davies recognises that operating across multiple jurisdictions exposes us to varying levels and types of bribery and corruption risk. We are committed to proactively identifying, assessing, and managing these risks to ensure our business is conducted with integrity wherever we operate.

Davies maintains a robust global governance framework designed to help mitigate these risks, supported by clear policies, effective internal controls, mandatory training, and ongoing monitoring. We expect all employees and relevant third-party partners to uphold our ethical standards and to act transparently, responsibly, and in compliance with all applicable anti-bribery and corruption laws.

Our commitment to understanding and addressing anti bribery and corruption risks is fundamental to maintaining trust, protecting our people and clients, and ensuring the long-term sustainability of our operations worldwide.

The Davies Risk & Governance Board have oversight of the Group's anti-bribery and corruption framework and receive regular reporting on its effectiveness and key risks.

Purpose and Commitment

Davies is committed to conducting business with integrity, transparency, and in a manner designed to comply fully with all applicable anti bribery and corruption (ABC) laws globally. We take a zero-tolerance approach to bribery, corruption, and any related unethical conduct across all our global operations.

Bribery and corruption undermine trust, distort markets, and create unfair business environments. Davies is committed to preventing, detecting, and addressing any form of bribery or corrupt activity, whether real, attempted, or suspected.

Davies prohibits, and will not tolerate:

- Offering, giving, or receiving bribes (directly or indirectly)
- Improper payments or inducements or advantages of any kind
- Facilitation payments
- Kickbacks, secret commissions, or conflicts of interest used to secure an improper advantage
- Gifts, hospitality, entertainment or expenses intended to influence decision-making improperly
- The use of third parties to disguise or enable bribery or corruption
- False or misleading records that conceal the purpose of payments or benefits

Managing Higher Risk Situations

- Bribery and corruption risks can increase through interactions with:
 - Public officials and state-owned entities
 - Clients, suppliers, intermediaries, agents or introducers
 - Charitable donations, sponsorships and community contributions
 - Business development activity in higher-risk markets or sectors

Davies applies proportionate and risk-based controls to manage these risks, including due diligence, approvals and record-keeping requirements as set out in our relevant policies and standards.



Global Standards and Regulatory Alignment

Davies operates across multiple jurisdictions and seeks to ensure compliance with all applicable anti bribery and corruption laws, regulations, and international standards. This includes, where relevant:

- The UK Bribery Act 2010
- The US Foreign Corrupt Practices Act (FCPA)
- Applicable EU anti-corruption directives and member state legislation
- Local anti-bribery and corruption laws in each jurisdiction where we operate
- Relevant international conventions and recognised industry codes of conduct

Where legal or regulatory requirements differ, Davies applies the highest appropriate standard to promote consistent ethical conduct and effective risk management across its global operations. This includes compliance with all applicable anti-bribery and corruption laws in the jurisdictions in which we operate, including laws with extraterritorial reach.

Governance and Accountability

Davies maintains a governance framework designed to prevent and manage bribery and corruption risks. Key elements include:

- Clear anti bribery & corruption policies and supporting procedures
- Risk-based due diligence on clients, suppliers, and third-party intermediaries
- Oversight from Group Compliance and Divisional Compliance Teams across all jurisdictions
- Transparent approval processes for gifts, hospitality, and charitable contributions
- Internal reporting mechanisms and whistleblowing channels
- Periodic risk assessments and independent assurance activities

We take appropriate action where concerns are identified and addressed in line with our policies, contractual rights, and legal obligations.

Findings from monitoring activities, audits, and risk assessments are used to inform improvements to our policies, controls, and training programmes.

Breaches of our anti bribery and corruption standards may result in disciplinary action, termination of business relationships and where required reporting to relevant authorities.

Risk Management and Controls

Davies employs a comprehensive suite of risk-based controls designed to prevent, detect, and respond to financial crime threats. These include:

- Client and third-party due diligence
- Screening and monitoring against sanctions and watchlists
- Fraud prevention and detection tools
- Confidential reporting (whistleblowing) channels
- Periodic risk assessments across business units
- Internal audits and independent assurance

Our control environment is regularly reviewed and enhanced to respond to emerging risks and regulatory developments.



Culture, Training and Awareness

All employees receive mandatory anti bribery & corruption training to ensure they understand their responsibilities, recognise prohibited conduct, and know how to raise concerns. Additional enhanced compliance training is provided to higher-risk roles and leadership positions.

Davies promotes a culture where ethical behaviour, transparency, and accountability are expected and reinforced.

Third Party and Supply Chain Integrity

Davies expects its suppliers, partners, agents, and other third-party representatives to demonstrate standards of ethical conduct consistent with our own. Contractual commitments, due diligence, and ongoing monitoring help promote alignment with our anti bribery & corruption expectations and regulatory obligations.

Queries and Escalations

Everyone has a responsibility to prevent, detect and report bribery and corruption. If colleagues are offered a bribe, asked to make one, suspect misconduct or believe they may be a victim of bribery or corruption, they must raise this promptly via Group Compliance, Divisional Compliance Team or the Speak Up channel, in line with the Global Speak Up Policy.

Davies does not tolerate retaliation against anyone who raises a concern in good faith.

Continuous Improvement

Davies monitors evolving legislation, emerging risks, and recognised good practice to continually strengthen its bribery & corruption framework and promote ethical decision-making across the organisation.

Document Control

Approval

Effective Date	31-Jul-2026
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Document Owner	Group Compliance
Approved By	James Heath, Group Chief Risk Officer

Document Review

This document is reviewed at least annually and may be updated at any time.

The latest version is available on the Intranet withing the Governance, Risk and Compliance Hub or from Group Compliance upon request.

Review, approval, and version history records are maintained within the Group Policy Management Platform and are available from Group Compliance on request.

