

POLICY NAME	ANTI BRIBERY AND CORRUPTION POLICY
EFFECTIVE DATE	1 AUGUST 2023
POLICY OWNER	MANAGING DIRECTOR

INTRODUCTION

DSE Transport and its subsidiaries (collectively referred to as **DSE**) are committed to conducting business with integrity and in compliance with all state and territory laws and regulations governing anti-bribery and corruption.

This policy outlines the principles and guidelines that all employees, contractors and consultants must adhere to when conducting business on behalf of DSE. Bribery and corruption in any form are strictly prohibited, and any substantiated violation of this policy will result in disciplinary action, up to and including termination of employment or contractual relationship.

SCOPE & COVERAGE

This policy applies to all individuals working for or on behalf of DSE, including employees (permanent and casual), temporary staff, subcontractors and their employees, consultants, suppliers, distributors, agents and any other third parties who act on behalf of the Company.

The Policy covers any activity or behaviour undertaken during the course of, or in connection with, employment or acting on behalf of DSE, regardless of the geographical location in which that activity or behaviour occurs.

Amongst the key principles of the Policy, it should be noted that:

- DSE has zero appetite towards bribery, corruption and facilitation payments.
- The giving, receiving, offering, promising, requesting or authorising of a bribe is expressly prohibited.
- Business activities must be transparent, sufficiently documented and above suspicion.
- Due diligence is to be conducted on employees and on those who are doing business with, or on behalf of, DSE.

DEFINITIONS

- **Bribery:** The offering, promising, giving, receiving, or soliciting of anything of value, including but not limited to money, gifts, entertainment, hospitality, or favours to influence the actions of an individual in a position of trust, or to gain an improper advantage.
- **Corruption:** Any dishonest or illegal conduct, abuse of entrusted power for private gain, or unethical behaviour that undermines the integrity of the organisation or its representatives. This could include conflicts of interest, kickbacks, or embezzlement.

- Facilitation Payments: The term 'Facilitation Payment' means any payments which are made to expedite or secure the performance of a routine government action which is ordinarily and commonly performed by a government employee and to which the payer is legally entitled, without making such payment.

ZERO TOLERANCE POLICY REQUIREMENTS

- Bribery: Employees and representatives of DSE must not offer, promise, give, request, or accept bribes, kickbacks, facilitation payments, or any other improper advantage to or from any person or entity, whether in the public or private sector.
- Facilitation Payments: Also known as 'grease payments' and made to expedite routine government actions are strictly prohibited.
- Conflicts of Interest: Employees and representatives must disclose any personal, financial, or other interest that could potentially interfere with their objective and impartial decision-making in the course of their duties.
- Accounting and Record Keeping: Any dishonest, off-the-book accounting, falsification of records, or concealment of complete and accurate financial activity is strictly prohibited. All accounting and financial transactions must be accurately and transparently recorded in the Company's books and records.
- Political Contributions: DSE does not make political contributions to political parties, candidates or organisations, either directly or indirectly, that may be construed as bribes or improper inducements.

GIFTS AND HOSPITALITY

DSE understands that the giving and receiving of gifts and hospitality of reasonable value, and where nothing is expected in return, help form positive relationships with third parties when they are proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

- Gifts include goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context).
- Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations.

No gift should be given, nor hospitality offered by an employee or anyone working on the Company's behalf to any party in connection with the business without receiving prior written approval from the relevant State Manager and Managing Director. Similarly, no gift or offer of hospitality should be accepted by an employee or anyone working on the Company's behalf without receiving prior written approval from the relevant State Manager and Managing Director. A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and the Company reserves the right to amend this policy without prior notice.

'SPEAKING UP' AND REPORTING ANTI-BRIBERY & CORRUPTION MATTERS

DSE fosters a culture of speaking up to encourage reporting of any suspicion of a Bribery and/or Corruption incident, or other concerns relating to anti-bribery and corruption without fear of reprisal. All allegations of Bribery and Corruption or other related concerns are to be reported at the earliest opportunity or upon the concern being discovered.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact your State Manager or the Managing Director so that action can be taken if considered necessary. You will be asked to give a written account of events.

If you, as an employee or person working on DSE's behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to your State Manager or the Managing Director. You will be asked to give a written account of events.

If you report a suspected violation of this policy, DSE will ensure you understand:

- your right to remain anonymous, and what happens after you report your concerns; and
- that you will not be subject to any reprisals in response to expressing those concerns, so that you feel safe and supported in expressing your concerns.

BREACH OF POLICY

DSE takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise. The Company will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on its behalf, should an act of bribery, or attempted bribery, be found to have taken place. This action may result in termination of employment for an employee, or the cessation of the business arrangement/agreement for contractors. Staff are reminded of DSE's Whistleblowing policy which is available on Sharepoint.

POLICY REVIEW

The Anti-Bribery and Corruption Policy will undergo regular reviews, conducted at least once each year, to ensure compliance with any changing legal requirements.