

Anti-bribery Policy

DFS is committed to carrying out its business fairly, honestly and openly and has a zero tolerance of bribery and corruption.

We do not make or accept bribes, or condone the offering or acceptance of bribes on our behalf. This policy extends to all of the company's business dealings and transactions in all countries in which the company and its associates operates.

All directors and employees are required to comply with this policy and we avoid working with organisations who do not also commit to doing business without bribery.

Bribes may take the form of gifts (money, goods, services), hospitality (meals, entertaining, tickets to events, travel expenses), political or charitable donations, sponsorship or favours.

Gifts & Entertainment

As gifts and entertainment can sometimes disguise bribes, or be misinterpreted as bribes, we have established the following guidelines which clearly define what we consider to be genuine and acceptable and what is not:

- We may accept gifts of small items of limited value (less than £200). We may not accept valuable items.
- Valuable items received as gifts will be returned, or disposed of as agreed by management.
- Although we may accept a gift on occasion, we may not accept gifts which are given regularly or often.
- Gifts we give must be of moderate value, legal under local law and agreed by management.
- We may give and accept reasonable, hosted entertainment which is in the legitimate interests of the business.
- We will not give or accept lavish or frequent entertainment, or entertainment which is not hosted.

The company recognises that gifts and hospitality may form an acceptable part of building relationships. However the offer or acceptance of gifts which could affect or be perceived to affect the outcome of business transactions, or which are not reasonable and in good faith, is prohibited.

Facilitation payments

Facilitation payments are small amounts demanded by providers of services to secure or 'facilitate' services to which the payer is already entitled, such as obtaining a visa. Equally they can be inducements offered to or demanded by customs, immigration and other officials to speed up the granting of services and permits. In either case, they are illegal and must not be offered or paid.

It is DFS policy that our agents and other intermediaries, contractors and suppliers do not make facilitation payments on our behalf.

Donations and sponsorship

Charitable donations (to registered charities only) may be made with the approval of the Human Resources Director (for amounts below £10,000) or the Board. No donations are made to charities connected to business partners while any bid/contract process is ongoing.

Political contributions may only be made with the full consent of the Board. Donations may only be made to registered political parties; no donations may be made to individuals.

Sponsorship payments are made for business promotional purposes and are distinct from charitable donations. All sponsorship arrangements must be clearly documented and terms agreed in writing with the sponsee as to the amount to be paid and the promotional benefits to be received in return.

Employees

Employees must not solicit, arrange or accept bribes intended for their benefit or that of their family, friends, associates or acquaintances.

Employees must not offer, promise or give a bribe to anyone in connection with their work for the company.

Employees should consult their manager if in any doubt about whether a gift or hospitality may be accepted.

Where an employee been offered a bribe, or suspects that others may have offered or accepted a bribe, they should in the first instance report it to their line manager if possible.

Where this is not possible or appropriate (for example if the line manager is suspected of being involved), the matter should be reported to another manager or director.

Alternatively, employees can raise concerns through the Company's Whistle Blowing Procedure.

Employees will not be penalised for the loss of contracts or other impact on the business arising from refusing to pay or accept a bribe.