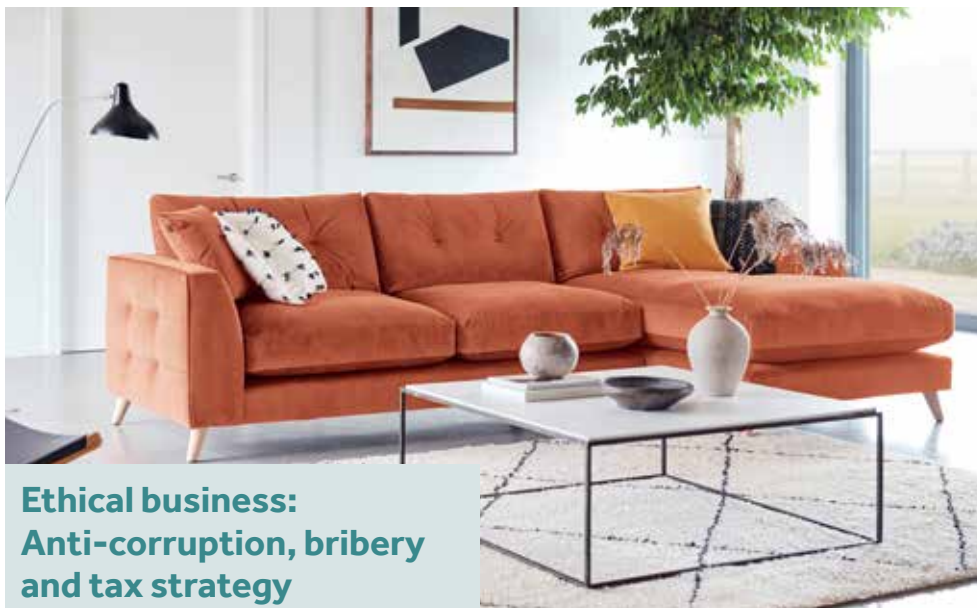


## Responsibility & sustainability report continued



### Ethical business: Anti-corruption, bribery and tax strategy

#### Our commitment

We are committed to conducting all of our business in an honest and ethical manner, acting professionally, fairly and with integrity in all our business dealings and relationships. We implement effective systems to counter the risk of bribery and corruption.

We apply our policies across all of our operations, and also require all of our suppliers to commit to apply the same or equivalent policies.

The Group does not operate in any tax havens or use any tax avoidance schemes.

Our anti-corruption and anti-bribery policy and our Tax Strategy are available on our website <https://www.dfscorporate.co.uk/governance/policies> and our key principles are stated below:

#### Bribery and Corruption

The principle: We will not accept bribery or corruption; in any form, or in any place and we do not offer, give, or take a bribe or inappropriate payment, either directly or indirectly.

What this means in practice:

- Offering, giving, taking or promising things that may influence, or affect an organisation or individual in order to gain business, or an advantage, is not allowed in any form
- Accepting or offering a bribe/kickback payment of any kind is prohibited; a bribe doesn't have to be successful to be corrupt
- We will never use our charity or sponsorship activities to gain an unfair advantage
- We expect all colleagues, partners and suppliers to report any breaches, or suspected bribes or corrupt behaviour

#### Gifts and Hospitality

The principle: Giving or accepting a gift or hospitality should only be done if it can be proved to be of small and modest value. They should never influence the decisions we take.

What this means in practice:

- We don't offer or accept gifts or hospitality as part of contract negotiations or sales transactions
- Any gifts given or received are modest in value and recorded appropriately

#### Conflicts of interest

The principle: All potential or actual conflicts of interest should be declared and managed. This will ensure they never stop us from making objective decisions.

What this means in practice:

- We don't put ourselves in a position where our knowledge or relationships compromise our decision
- All personal conflicts of interest are declared – even if they are potential in nature
- Insider trading, either direct or indirect, is strictly prohibited by law

#### Business transactions and information

The principle: All business records, information and transactions must be recorded accurately and honestly. We're steadfast in our approach to preventing any kind of fraud, embezzlement, money laundering or other financial crime.

What this means in practice:

- We have robust controls in place to prevent and detect any form of fraud or money laundering
- The records of our business dealings and finances are accurate and well maintained
- If we suspect any kind of irregularity in our finances, they are reported straight away to the management team

- Timesheets and expenses that are submitted for payment are accurate and timely

#### Data Protection Policy and Cyber

The Group's operations depend upon the continued availability and integrity of its IT systems, including the security of customer and other data held by the Group, and risk of attacks is ever increasing. Cyber has been identified as a principal risk, see page 40 for further details on the procedures and system in place to mitigate the risks.

The Group will take all steps necessary to comply with the principles as set out in the GDPR and DPA 2018 and have a formal Data Protection policy.

This Strategic report was approved by the Board on 23 September 2021.

On behalf of the Board

**Tim Stacey**

Chief Executive Officer

**Mike Schmidt**

Chief Financial Officer