

## Anti-Bribery and Anti-Corruption Policy

**TITLE:** Anti-Bribery and Anti-Corruption Policy  
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### Signature Authority

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Manager, Manufacturing	Dave Smith		
Purchasing Manager	Alvin Butler		
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- 1.0 Purpose and Scope
  - 1.1 To define a policy reflecting our corporate position against bribery and corruption.
  - 1.2 This policy applies for all DDH employees. We expect the same commitments from all of our suppliers, subcontractors and other business partners.
- 2.0 Associated Documents
  - 2.1 DDH-2069 Code of Conduct
  - 2.2 DDH-2071 Whistleblower Policy
- 3.0 Introduction
  - 3.1 Bribery and corruption is, unfortunately, a feature of public and corporate life in many countries around the world.
  - 3.2 DDH, while relatively small and with a limited procurement budget, does have a global reach and therefore needs a clear policy on anti-bribery and corruption to support our employees to make decisions in line with our values.
  - 3.3 Our corporate conduct is based on our commitment to acting professionally, fairly and with integrity. DDH does not tolerate any form of bribery and corruption.
- 4.0 Definitions
  - 4.1 *Bribery* is the offering, promising, giving, accepting or soliciting of money, gifts or other advantage as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organization's activities.
  - 4.2 *Corruption* is the abuse of entrusted power for private gain.

## Anti-Bribery and Anti-Corruption Policy

- 5.0 Policy
  - 5.1 Bribery - Our principle policy is a “Zero-tolerance of bribery” in any form, meaning that DDH institutionally and its employees will not engage in bribery or any form of unethical payments including facilitation payments.
  - 5.2 Conflicts of Interest - All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of DDH. DDH employees must always make business decisions in the best interest of DDH.
    - 5.2.1 They have to avoid any conflicts of interest which would interfere or appear to interfere with their ability to perform their duties.
    - 5.2.2 Potential conflicts may include:
      - 5.2.2.1 Gifts
      - 5.2.2.2 Using DDH information for personal gain
      - 5.2.2.3 Evaluating friends or relatives that own or work in a company that is being selected as a potential DDH Supplier
      - 5.2.2.4 Owning part of a supplier business
  - 5.3 Whistleblower Policy – Suppliers or employees with information on bribery or corruption taking place within the organization should follow DP-7.1.4.1 DDH Whistleblower Policy, which also contains a strict anti-retaliation policy
- 6.0 Training and communication
  - 6.1 DDH will communicate this policy and relevant guidance to our suppliers, contractors and employees. DDH managers and employees will receive relevant training on how to implement this policy within their job scope.
- 7.0 Monitoring and review
  - 7.1 DDH will periodically review the implementation of this policy in respect of its suitability and effectiveness and make improvements as appropriate.

### Revision History

REV.:	ITEM#:	SUMMARY OF CHANGES:	Date
A	All	New Release	11/28/17