

ANTI-BRIBERY AND CORRUPTION POLICY

1. Introduction and purpose

At DUG we commit ourselves to maintaining high integrity and to operating fairly, honestly and legally, ensuring that we comply with international regulations with regards to anti-bribery and corruption issues. In addition, DUG has an open and transparent management approach in order to avoid exposing ourselves to situations of possible conflict of interest.

DUG is committed to maintaining a high standard of ethical conduct in all business dealings. DUG does not obtain or retain business through any unethical or illegal means, and all contract and transaction related payments, including those in connection with gifts and other expenditure, are declared with reasonable details. DUG has developed this Policy to prohibit inappropriate conduct associated with bribery and corruption.

2. Responsibility for compliance

All DUG directors, officers, employees, secondees, contract personnel and any other individual that represents DUG (**DUG Personnel**) are personally responsible for complying with all applicable laws and regulations worldwide, and with DUG's policy. Any conflict between the policy and the law is to be referred to the compliance officer.

3. What is bribery and corruption?

Bribery involves providing, causing, offering, accepting, receiving, soliciting, promising or asking for a benefit to influence a person in order to gain an advantage which is not legitimately due. It does not matter whether the bribe is accepted. The act of offering a bribe is usually enough to commit an offence. Corruption involves an abuse of power, for personal gain or advantage for an entity (together **Improper Acts**).

Specific laws relate to bribery of foreign public officials, where large financial and criminal penalties may apply to both the individuals involved and DUG. Further information is made available in DUG's *Anti-Bribery and Corruption Compliance Guide* for further guidance on applicable anti-bribery laws.

4. Prohibition on improper acts and other unfair dealings

This Policy prohibits DUG Personnel from conducting any Improper Acts anywhere in the world (in both the private and public sector and irrespective of whether such Improper Act is on a direct or indirect basis). DUG Personnel may also be personally liable and

exposed to criminal and civil liability if they engage in any illegal Improper Acts.

DUG Personnel will make a clear distinction between the interests of DUG and private interests, and avoid conduct that would expose DUG Personnel to possible conflicts of interest. DUG Personnel will not misuse privileged information, misrepresent information or conduct other unfair acts.

5. Money laundering

Money laundering is prohibited. Money laundering broadly involves the act of concealing or attempting to conceal illegal funds and disguising the funds to give the appearance that they are legitimately obtained.

6. Facilitation payments

All facilitation payments are considered Improper Acts.

The making of 'facilitation payments' either directly or indirectly through agents, contractors or intermediaries by DUG Personnel is prohibited. A facilitation payment could be a minor, unofficial payment to a public official in order to expedite a routine government action by a public official.

A public official includes anybody who has any official or representative capacity in any part of any government (whether national, state / provincial or local) or any regulatory entities and includes anybody who holds themselves out to have such capacity.

7. Gifts and entertainment

DUG recognises that offering or accepting gifts and entertainment, which are of moderate value and proportionate, is generally considered to be in accordance with business practice. However, the exchange of gifts and entertainment may give rise to conflicts between the personal interests of DUG Personnel and the company interests of DUG. DUG Personnel are prohibited from offering or accepting gifts or entertainment in circumstances which could give rise to, or appear to give rise to, Improper Acts and must always consider this Policy when gifts or entertainment occur. DUG Personnel must always ensure that any gifts or entertainment offered, given or accepted are proportionate and in line with common business practice, considering the location where and the timing of when the gift or entertainment occurs.

We are to ensure that all gifts and entertainment given to or received from third parties are approved by management. It is DUG's policy that gifts or



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entertainment with a value exceeding US\$250 per person must not be offered, given or accepted by DUG Personnel without the prior approval of the Compliance Officer.

DUG Personnel who offer, give or receive a gift or entertainment which has a value over US\$250 must immediately report it to the compliance officer so that such gifts or entertainment can be recorded in the Gifts and Entertainment Register. The chief financial officer (**CFO**) will regularly review the register.

8. Charitable contributions, sponsorship and political donations

DUG does not make political donations in any country. DUG Personnel must not make or offer any charitable contribution, donation or sponsorship on behalf of DUG without prior approval from the CFO. All donations greater than US\$250 will be recorded on the Contributions Register.

9. DUG's contractors, sub-contractors and agents

DUG expects that its contractors, sub-contractors and agents will avoid Improper Acts and act legally and ethically in all their dealings (not only dealings that involve DUG). DUG Personnel will ensure that contractors, sub-contractors and agents are made aware of and know the standards DUG expects and commits to maintain.

10. Safety and liberty exception

In the event that any DUG Personnel experience a threat to the safety or freedom of a person, they are not required to comply with this Policy. Such DUG Personnel must immediately after the event provide a detailed report of what occurred to the compliance officer.

11. How to raise a concern

DUG Personnel are encouraged to speak up if they suspect any actual, planned or potential Improper Acts or unfair dealings. Any questions or concerns about this Policy should be directed to the compliance officer. DUG's *Whistleblower Policy* is also accessible for further guidance as to how to raise any concern.

12. Consequences of breaching this Policy

Any actual or suspected violation of this Policy should be reported by the compliance officer to the board of directors as soon as it is identified. Breach of this Policy by any DUG Personnel will be regarded as serious misconduct. DUG Personnel may be subject to

disciplinary action, which may include termination of employment. In addition to breaching this Policy, DUG Personnel may be exposed to personal liability at law if they engage in any Improper Acts that are illegal.

Where possible, DUG will seek to terminate its relationship with any contractor, sub-contractor or agent if it is determined that such party has failed to comply with this Policy.

This Policy will be reviewed regularly to ensure its relevance to the ever-changing environment.

The compliance officer's details are included below:

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