



## CODE OF CONDUCT

### 1. Comply with laws, regulations and DUG standards

**We are individually responsible for complying with the laws, regulations and DUG standards.**

As member of DUG, we represent the company and as such, it is our responsibility to ensure compliance with applicable laws, regulations and DUG standards wherever we operate. Failure to do so may expose the company to severe brand damage, loss of clients, a decline in regulatory and public confidence, fines or other penalties.

Revenue opportunities will not take priority over protecting our reputation and our brand. Taking shortcuts to achieve revenue targets is never acceptable. Even when other companies may not fully observe these standards, we still have to observe them as they reflect DUG's values, and values are not abandoned simply because others do not share the same stance.

If we discover that we are unintentionally breaching a law, regulation or DUG standard, we will discontinue the act immediately and report the breach to management.

### 2. Reject bribery and corruption

**We will not give or accept bribes or engage in any form of corruption.**

Bribery and corruption damages our business and conflicts with our values. We oppose all forms of bribery and corruption because it is illegal and dishonest, and damages the countries and communities where it occurs. We are in breach of this Code of Conduct, DUG's *Anti-Bribery and Corruption Policy* and also be liable to criminal prosecution if we engage in such activities.

Most countries have laws prohibiting bribery and corruption. Many countries have laws that prohibit this even when it is committed outside the country. A breach of these laws is a serious offence, which may result in fines to DUG and the imprisonment of employees. Even the appearance of a breach may have a serious reputational impact on DUG. Suspicion or knowledge of anyone seeking or offering personal payments, benefits, or other favours in contravention of this Code of Conduct, must be immediately reported to management.

### 3. Avoid being compromised by gifts and entertainment

**We will not offer, give or accept inappropriate gifts or benefits to or from third parties.**

Gifts, business entertainment or other benefits are a part of commercial life in many countries, and often part of traditional festive occasions as well. However, problems arise when they begin to compromise the commercial relationship. As a general rule we are not allowed to offer, give or accept gifts or other benefits.

There are exceptions such as gifts and entertainment that are reasonable in value, consistent with established market practice and appropriate to the occasion in the context of local custom and cost of living are permissible. However, they must not be, or be perceived to be, an inducement for business.

We are to ensure that all gifts and entertainment given to or received from third parties are approved by management. In accordance with DUG's *Anti-Bribery and Corruption Policy*.

### 4. Avoid conflict of interest

**We will take steps to avoid conflict of interest. If we identify a potential conflict of interest, we take action to resolve and manage it in an open manner.**

A conflict of interest arises when an employee is in a decision-making position and participates in an activity or acquires another interest or loyalty that jeopardises their judgment, objectivity or independence. Broadly, there are two types of conflict of interest, namely:

- (a) Personal - where there is potential to put personal interests ahead of DUG's; and
- (b) Business - with a client, or has confidential information about a client that could be used in another client's relationship.

Whichever form they take, all conflicts of interest can expose our judgment, and that of DUG's, to scrutiny and criticism. Even the perception of a conflict of interest can cause difficulties. They can also damage DUG's reputation and our own personal standing.

If we suspect that there is/will be a potential conflict of interest situation, we must declare it immediately to management. We will be transparent and open when we identify such a situation, and take action to resolve and manage the situation in an open manner. We will not try to resolve a conflict of interest on our own.

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### 5. Speak up

**We will speak up if we suspect any actual, planned or potential behaviour that may breach any laws, regulations or DUG standards.**

Speaking up is how we raise concerns, in confidence, about misconducts and malpractice. We encourage speaking up by providing our staff with a confidential and secure means to raise concerns.

Misconduct and malpractice undermines our reputation and the trust placed in us by our stakeholders. It is important that we can speak up when we have genuine concerns.

DUG's *Whistleblower Policy* governs the process by which DUG employees and third parties can anonymously report potential or suspected violations of any legal or regulatory activities.

### 6. Do not mis-sell or misrepresent DUG or its products or services

**We will comply with local laws, regulations and DUG standards on mis-selling and advertising.**

Mis-selling is the sale of a product or service without regards to the client's interests. Mis-selling exposes DUG to reputational damage and possible legal action. Misrepresentation is providing inaccurate or misleading information about DUG, its product or services, which will prevent clients from making an informed decision.

We will provide relevant and complete information to clients in order to ensure that they have the best choice of product. We will not sell products or services to clients that do not meet their needs without regards to the clients' interest. All possible efforts will also be made to ensure that the client understands the product and any possible risks, particularly with complex products.

### 7. Respect data confidentiality and intellectual property

**We will respect DUG standards, laws and regulations governing confidentiality of information, data protection and DUG's intellectual property. We will not disclose client or DUG data unless authorised to do so.**

Confidentiality of client data is fundamental to our relationship with our clients. Unauthorised disclosure or wrongful use of confidential data will undermine clients' trust in DUG and may lead to reputational damage, as well as legal action from clients.

We will exercise care in relation to confidential or sensitive information and data belonging to clients or DUG. Such information will not be disclosed unless authorised to do so by DUG or by law.

Intellectual property can be an invention, trademark, original design or the practical application or expression of an idea that has commercial value. We will work to safeguard DUG's intellectual property from unauthorised use by outsiders, and this obligation applies throughout our employment and continues after our employment ceases.

### 8. Treat our people fairly

**We will treat our colleagues with fairness and respect, help them to grow and enable individuals to make a difference. Every employee is entitled to a safe working environment that is free from discrimination, bullying and/or harassment.**

We have a duty of care to all our colleagues and DUG seeks to promote the well-being of all our employees. We will treat our people fairly, protecting the rights of our colleagues, as well as complying with our legal obligation.

We also encourage continuous learning and development of skills, as we have the responsibility to nurture and help develop the potential of our people. DUG believes that if we treat our colleagues and teams as partners, our people will deliver exemplary performance and growth in our business results.

### 9. Responsibilities to our communities and regulators

**We will be responsive to our communities and demonstrate exemplary governance at all times.**

We believe that the biggest contribution we can make to the communities we work in is through operating a commercially successful, sustainable business in a responsible way. In essence, this means delivering quality products and services to clients that meet their needs, providing a good working environment for our employees, and managing our social and environmental impacts effectively.

DUG works both independently and in collaboration with others in addressing ethical issues of importance, such as climate change and human rights. A key part of exemplary governance is maintaining a strong and effective relationship with local regulators and government. We advocate for co-operation, openness and honesty when dealing with our communities and regulators.



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DUG's *Sustainable Supply Chain and Procurement Policy* details the support we provide within our local communities.

### 10. Work in a safe environment

**We will ensure our employees work in a safe and healthy environment.**

In DUG, we believe that our employees' health and safety is paramount. It is in the best interest of our employees, contractors and clients that extra steps are taken to ensure that our people are able to work in conditions where they do not have to worry about their physical wellbeing. Our people are required to support and comply with DUG's *Health, Safety and Environmental Management Policy* and initiatives, and take an active role in upholding the implementation of these initiatives.

### 11. Protect DUG's assets

**We will safeguard the proper use of DUG's physical assets.**

By providing adequate equipment and tools, we trust that our people are able to produce optimal quality work in the shortest period of time. As such, all employees are encouraged to protect and maintain DUG's physical assets as best as they can, and to restrain from using these assets for unauthorised matters.