

Code of Business Ethics and Conduct



1. Introduction

DT Global conducts its business in an ethical manner and with the highest standards of integrity. Adherence to this Code of Business Ethics and Conduct (“Code”) by all employees, including company directors, company management, stakeholders, consultants, and contractors, referred to collectively as “staff” for the purposes of readability, is essential to merit the confidence and support of our clients and partners. Staff of DT Global must act in ways that are lawful, ethical, and which safeguard and build trust with our business partners, stakeholders, colleagues, and communities. It is your responsibility to know, understand and comply with all the ethical, legal, and safeguarding obligations that apply to you.

DT Global works with clients across both the public and private sectors to achieve a positive and lasting impact on the lives of people around the world. For DT Global, ‘safeguarding’ means protecting the health, well-being, human rights, and natural environment of people and communities that we engage with through our programs and corporate operations, with a particular focus on safeguarding women, children, and vulnerable adults, who can disproportionately bear the negative impacts of international development programs.

You should take the time to learn what ethical, lawful, and safeguarding risks exist in your role for DT Global. Your conduct both inside and outside the workplace may impact DT Global, our business partners, and your colleagues.

This Code has been prepared as a working guide and not as a technical legal document. Thus, emphasis is on brevity and readability rather than providing an all-inclusive answer to specific questions. In observance of this code, as in other business conduct, there is no substitute for common sense. Staff should apply this code with common sense and the attitude of seeking full compliance with the letter and spirit of the policies and rules presented. Further guidance on your ethical, legal, and safeguarding obligations can be found in DT Global’s Global Policies folder on SharePoint and the regional policies and procedures applicable in your work location.

It is incumbent upon you, as part of DT Global staff, to perform satisfactorily and to follow our policies and comply with our rules as they are issued or modified from time to time. These policies and rules are necessary to effectively manage the business, meet the ever-changing needs of the marketplace, and to safeguard the reputation and staff of DT Global. Good performance and compliance with business rules lead to success. All staff are required to read, understand and apply this code; a signed copy of your acknowledgment will be kept on file.

Violations of the Code may result in disciplinary action, including dismissal and criminal prosecution. There will be no reprisal or retaliation in any form permitted against anyone who reports a violation or suspected violation of the Code or any applicable laws. The absence of a specific guideline practice or instruction covering a particular situation does not relieve you from exercising the highest ethical standards applicable to the circumstances.

If you have any doubts regarding a questionable situation that might arise, immediately consult your supervisor, manager, a member of the senior management team, or DT Global General Counsel at GeneralCounsel@DT-Global.com.

2. DT Global Company Values, Core Objectives, and Goals



**Creating Impact.
Transforming Lives.**
Partnering for a better world.



Our Values



				
Learning & Adaptation	Diversity, Equity, Inclusion & Accessibility	Innovation	Civility	Technical Excellence
Continuously documenting, reflecting, and operationalizing best practices that address programmatic and professional challenges.	Proactively ensuring equitable participation that reflects diverse perspectives at all levels.	Fostering a culture that values and rewards experimentation and risk taking beyond our comfort zone.	Recognizing the inherent value and contributions of all, while building community around respect and understanding.	Delivering world class solutions by providing cutting-edge technical expertise and advancing thought leadership.

DT Global values are Learning & Adaption; Diversity, Equity, Inclusion & Accessibility; Technical Excellence; Civility; and Innovation. These core values sit within an overarching behavioural framework of integrity and collaboration. To support our ethical culture, all staff are expected to live and lead DT Global core values and to act collaboratively and with integrity, at all times.

DT Global values also support our Vision: To positively impact 500 million lives by 2045; and our Purpose: Creating impact, transforming lives, and partnering for a better world.

Learning & Adaption

A continuous process of documenting, reflecting, adapting, and sharing in order to grow and better address operational, programmatic, and professional challenges. DT Global's emphasis on experience, evidence, and learning ensures that we are providing our partners and clients around the world with strong, responsive, context-appropriate programs that achieve maximum impact on the ground.

Diversity, Equity, Inclusion & Accessibility

DT Global aims to attract and retain people with diverse skills, experience and background to deliver high quality services. We are committed to providing a diverse, equitable, inclusive, and accessible workplace culture where all our staff are valued and recognised for their unique qualities, ideas, and perspectives. We recognise that a workplace that reflects the diversity of our communities will be better able to understand the needs of our clients and stakeholders and make better ethical decisions. We will empower people to express their unique differences. We will ensure there are no structural and systemic barriers so that everyone can reach their full potential, in a safe, equitable, and respectful workplace and will strive to make information, activities, and/or environments sensible, meaningful, and usable for as many people as possible.

Innovation

Fostering a disruptive culture that values experimentation and risk taking beyond our comfort zone. DT Global's environment encourages staff to collaborate and to generate new ideas, where co-design and partnership opportunities are welcomed and identified, where experimentation and testing is encouraged, and where evolving best practices are widely shared. These steps combine to create thoughtful and impactful solutions for DT Global, our clients, and stakeholders.

Civility

Recognizing the inherent value and contributions of all, while building community around respect and understanding. At DT Global our policy is to treat our staff, clients, stakeholders, business partners, and members of the public with fairness, civility, and respect. We are committed to providing a work environment which is safe and free from inappropriate workplace behaviour such as unlawful discrimination, harassment, vilification, victimisation, and bullying.

Technical Excellence

Becoming a recognized industry leader by providing adaptive, cutting-edge technical expertise and thought leadership.

3. Diversity, Equity, Inclusion & Accessibility

DT Global is committed to an inclusive culture which values diversity of thought, opinion and background, and where staff are provided with equal access to opportunities. This diversity enriches the culture of DT Global.

At DT Global we believe that inclusion is harnessing our diverse workforce to work together effectively, where people are respected, connected, progressing, and contributing to organisational success. DT Global recognises the important role leaders play in creating an inclusive culture and building inclusive teams where each of our staff feel they belong, are valued and respected, and can speak up. We strive to leverage the full potential of all our staff and create a culture that both values and benefits from equality, diversity, inclusion, and accessibility. DT Global embraces differences and values individuality and will seek to provide equitable access to information and services to everyone along the continuum of human ability and experience

DT Global does not tolerate discrimination against people based on race, color, national extraction, or social origin, gender, gender identity or sexuality, physical or mental disability, age, marital status, pregnancy, family, or carer responsibilities, religion, or political belief. Staff are required to treat people equally. Discrimination in decisions concerning procurement, hiring, compensation, benefits, training, termination, promotions, or any other condition is prohibited.

4. Health & Safety

DT Global strives to provide a safe and healthy work environment. We expect staff to follow health and safety policies and practices and promptly report accidents, injuries or near misses, or unsafe practices, equipment, or conditions to a safety representative, project supervisor, or a senior manager. Staff must take reasonable care for their own health and safety and do nothing which adversely affects the safety of others. Report any risks to your health or safety or that of others to your manager.

DT Global does not permit violence, threatening behaviour, or behaviour not in accordance with DT Global Values or this Code in our workplaces. If staff witness bullying or other inappropriate behaviour it is important that they report it immediately, so that it can be stopped.

Staff must report to work in condition to perform their duties at their best, free from the influence of illegal drugs or alcohol. DT Global does not tolerate the use of illegal drugs in the workplace.

5. Environmental Compliance

DT Global conducts its business in an environmentally responsible manner that aims to prevent or minimize environmental impacts and promote improved environmental and social outcomes. We are committed to:

- Complying with partner government policies and laws specific to environmental protection and working with our clients and donor partners to meet their own environmental standards, policies, and requirements.
- Assessing, identifying, and managing direct and indirect environmental risks and impacts, including through development of robust management plans, frameworks, and operating procedures.
- Minimizing and, if possible, eliminating the use of any substance or material that may cause environmental damage.

- Reducing waste generation and disposing of all waste through safe and responsible methods.
- Promoting and demonstrating the use of safe technologies and operating procedures in our operations, projects, field offices, and with downstream partners.

Violation of environmental laws can be a criminal offense and can involve monetary fines and imprisonment. We expect staff to comply with all applicable environmental laws and follow office procedures designed to minimize DT Global's environmental impact.

6. Competition & Antitrust

Fair Competition

DT Global supports fair competition based on quality of our services and price. We will conduct our affairs honestly, directly, ethically, and fairly. To comply with the antitrust laws and our policy of fair competition, staff:

- Must never discuss with competitors any matter directly involved in competition between us and the competitor (e.g. cost information, teaming partners, and company policies);
- Must never agree with a competitor to restrict competition by fixing prices, allocating markets, or other means;
- Must not arbitrarily refuse to deal with or purchase goods and services from others simply because they are competitors in other respects;
- Must not require others to buy from us before we will buy from them;
- Must not require customers to take from us a service they don't want just so they can get one they do want;
- Must never engage in industrial espionage or commercial bribery; and
- Must be accurate and truthful in all dealings with clients and be careful to accurately represent the quality, features, and availability of DT Global offerings and services.

7. Commitment to Compliance & Human Rights

DT Global operates in many countries with differing laws and regulations. Staff are to comply with all applicable laws and regulations. All staff are charged with the responsibility of acquiring sufficient knowledge of the laws and regulations relating to their position in order to recognise potential dangers and to know when to seek guidance or legal advice.

In particular, when dealing with public officials, you must adhere to the highest ethical standards of business conduct. Should staff seek the resolution of regulatory or political issues affecting DT Global interests, we must do so solely on the basis of merit and pursuant to proper procedures in dealing with such officials. Do not offer, provide or solicit, directly or indirectly, any special treatment or favor in return for anything of economic value or the promise or expectation of future value or gain.

DT Global is committed to upholding individual human rights, following employment laws, and acting in compliance with internationally recognized human rights and labor standards in all the locations where we conduct business.

DT Global is opposed to all forms of:

- modern slavery including trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and child labour. One example of these practices is where an employer holds a worker's passport or other papers to prevent the worker from leaving his or her job.
- child labour within our supply chain and within all areas of our operations.
- discrimination; this includes discrimination based on a person's gender, race, ethnic origin, nationality, political opinions, religion, physical handicap, or sexual orientation.

We are committed to ensuring that working conditions throughout our supply chain, and in every aspect of our operations, comply with our commitment to respecting human rights and modern slavery obligations. For further information reference the DT Global Anti- Human Trafficking Policy and Modern Slavery Policy.

Staff are requested to report any suspected breaches of compliance laws or human rights to their Manager, the DT Global Ethics Hotline or to General Counsel, GeneralCounsel@DT-Global.com.

8. Child Protection

In the implementation of our mission to partner with governments, the private sector, foundations, NGO's, and civil society to deliver effective programming and transform lives, DT Global is committed to creating environments that are safe for children; where they are respected, protected, and empowered; and where staff are competent and well supported in meeting their protection responsibilities. The best interests of the child shall be a primary consideration.

DT Global has a zero-tolerance policy regarding any staff or downstream partners that engage in or support child exploitation and abuse, including possession of child exploitation material. DT Global will uphold the United Nations Convention on the Rights of the Child as well as the requirements of our global clients and donors and recognizes that it is the shared responsibility of all adults to prevent child exploitation and abuse.

DT Global Child Protection Principles are set out in the DT Global Child Protection Policy. All staff and downstream partners are required to:

- understand and conduct DT Global business in accordance with the DT Global Child Protection Policy, its principles, and DT Global values.
- contribute to building an environment where children are respected and encouraged to discuss their concerns and rights.
- comply with all relevant local laws of the country in which they are working or travelling.
- complete Child Protection training promptly as and when assigned.
- immediately report any concern, suspicion, or allegation of child abuse or exploitation.

Failure to report suspected or actual child abuse or exploitation will be viewed very seriously and may constitute a breach of this Code and/or applicable DT Global policies, leading to disciplinary action up to and including termination.

Prohibited Behaviour

DT Global staff and downstream partners *must not*:

- engage in sexual activity with children, sexually abuse, or exploit children; subject a child to physical, emotional, or psychological abuse and/or neglect; or engage in any commercially exploitative activities with children including child labour of trafficking.
- make any contact with a child or family members associated with DT Global's work that is not supervised by a (or another) member of staff. Such contact may include but is not limited to visits and any form of communication via social media, emails, and letters.
- use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative or suggestive (even as a joke), demeaning, or culturally inappropriate.
- hire children for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
- engage in inappropriate physical behaviour towards a child such as, rough physical games including horseplay; not hold, kiss, cuddle, fondle, or touch children in an inappropriate and/or culturally insensitive way; or do things of a personal nature that a child can do for themselves e.g. toileting, bathing, dressing.

Staff or downstream partners who engage in conduct prohibited by this Code or the DT Global Child Protection Policy or against any associated laws, will be disciplined and held accountable. Child abuse and exploitation will attract criminal, civil, and disciplinary actions, including referral to authorities.

9. Preventing Sexual Exploitation, Abuse & Harassment

DT Global aims to provide a safe and trusted environment that safeguards everyone from harm, including sexual exploitation, abuse, and harassment (SEAH) which is a violation of basic human rights. We recognise that the nature of our work – which includes situations of poverty, vulnerability, and discrimination – can create unequal power dynamics between beneficiary communities and our staff and downstream partners. This is especially relevant for vulnerable adults, women, and children.

All DT Global staff and downstream partners have an obligation to uphold the highest standards of personal and professional conduct at all times, ensuring that they never abuse their position of power to exploit another person. As reflected in DT Global's Prevention of Sexual Exploitation, Abuse, and Harassment (PSEAH) Policy, we have a 'zero tolerance' approach to SEAH, and adopt a survivor-centred approach to preventing and responding to suspected or actual breaches of our PSEAH Policy, as well as other safeguarding policies.

DT Global conducts its business in an ethical manner and with the highest standards of integrity. The behaviour of DT personnel and partners reflects on DT Global as an organisation, and at all times personnel and partners must act in ways that are lawful, ethical, and which safeguard and build trust with our partners, stakeholders, colleagues, and communities. This includes:

- upholding the values and reputation of DT Global.
- creating and maintaining a safe and trusted environment that safeguards everyone from SEAH.
- complying with all relevant local laws of the country in which they are working or travelling.
- immediately reporting any concern, suspicion or allegation of SEAH.

Prohibited Behaviour

DT Global staff and downstream partners are prohibited from fraternisation while engaged in DT Global business. DT Global staff and downstream partners *must not*:

- engage in sexual relationships with program participants or program beneficiaries, as these relationships are based on inherently unequal power dynamics and there is the potential for abuse of power.
- take advantage, prejudice, or discriminate against vulnerable adults. Personnel behaviour, activity design, and program delivery must account for the risks and needs of vulnerable adults.
- engage in unwelcome sexual advances or unwelcome requests for sexual favours, or engage in other unwelcome conduct of a sexual nature.
- engage in any form of transactional sex in any jurisdiction at any time. Those offering transactional sex, even if legal within that jurisdiction, are at higher risk of being coerced, trafficked, or otherwise be in a vulnerable state. This includes the exchange of money, employment, goods or services, protection or assistance, for sex, sexual favours, or other forms of exploitative behaviour
- support any form of sexual exploitation, abuse, or harassment activity including, for example, people trafficking or pornography.
- use computers, mobile phones, video cameras, cameras, or other technology inappropriately, or to exploit or harass children and vulnerable adults, or access or disseminate exploitative material through any medium, including social media.

DT Global staff must immediately inform their direct manager if they become engaged in a personal relationship which may be perceived as inappropriate or exploitative, or where real or perceived unequal power dynamics exist. Staff who are unsure if their relationships fall into this category should discuss the situation with their line manager and/or a member of the Human Resources team.

Sexual exploitation, abuse and harassment is a serious matter. Failure to act in accordance with DT Global policies and procedures will attract criminal, civil, and disciplinary actions, including referral to authorities.

10. Anti-Corruption

Staff of DT Global must conduct business in an ethical manner and with the highest standards of integrity and must never engage in any form of bribery and corruption. DT Global prohibits bribery anywhere in the world, in connection with any kind of business, directly by company personnel or through intermediaries or third parties, and to anyone, whether government officials, commercial employees, or private individuals.

Bribery may severely damage DT Global's reputation and disrupt our business operations. DT Global prohibits any corrupt actions, which may expose the company and staff involved, to criminal prosecution and civil penalties. Staff must report any requests made by a government official for money or anything of value.

This prohibition also applies to contractors, third parties and agents who deal with or act on behalf of DT Global. Under no circumstances are kickbacks, secret commissions, or similar payments permitted. Payments that are prohibited generally include cash payments and can include other things such as gifts, hospitality, travel, favours, business opportunities, and charitable donations, depending on the circumstances. DT Global may not retain a third party or enter into a joint venture or other business

association to engage in any activity that we are prohibited from participating in ourselves. Staff must also never make improper use of knowledge, power, or resources for personal gain or advantage.

DT Global also prohibits all other forms of corruption including collusion, bid rigging, coercion, and misrepresentation and facilitating payments. 'Facilitating payments' are small, infrequent payments made to a government official to expedite the performance of routine government actions such as issuing visas and work permits. These types of payments are prohibited by DT Global except in cases of clear danger when they are necessary to prevent immediate harm to staff. In cases where staff may be unable to consult with General Counsel, any payments made must be reported to General Counsel immediately to ensure accurate books and records. Any exceptions to this policy must be pre-approved by General Counsel in writing.

DT Global staff must report any knowledge of a violation of this Code or the Anti-Corruption Policy and are required to complete anti-corruption training as and when it is assigned. All staff are required to act in accordance with the Anti-Corruption policy at all times and may be required to certify compliance with this Policy from time to time.

Remember: There is no acceptable reason to compromise our principles or to conduct business by anything other than lawful and ethical means.

Obligation to Identify & Mitigate Corruption Risks

DT Global must take measures to reduce the risks of corruption when establishing new projects, hiring staff, consultants, project staff, choosing third parties, and into entering agreements. DT Global staff are our first line of defense in ensuring that our projects are compliant and that the third parties and those we work with share our ethical values and operate in a legal and compliant manner.

Some steps staff should take to reduce corruption risks include:

1. identifying any specific corruption risks in the project location.
2. Being aware of 'touch points' or situations with increased corruption risk – for example, applying for visas or permits.
3. conducting an ethics and corruption risk assessment and putting a mitigation/management plan in place.
4. ensuring all staff and consultants complete applicable training in timely manner.
5. engage third parties who share our ethical values.
6. following relevant policies and procedures.
7. 'Speak Up' to report any non-compliance or misconduct.

Contracting with Third Parties

When DT Global retains third parties, they must be held to the same high compliance standards as our staff.

The consequences of bribery can be severe, even when the bribe comes from a third party and not from DT Global directly. Our reputation will be at risk if we fail to effectively communicate our requirements to comply with our Code and all applicable laws, as well as carry out checks on our suppliers, partners, and contractors before we enter into a relationship with them. For this reason, DT Global is committed to screening suppliers and contractors to identify any high-risk relationships and situations.

Before retaining any third party, including sub-contractors, sub-consultants, suppliers, and business partners, staff must complete due diligence checks. DT Global screens all parties against applicable sanction lists of denied persons and entities.

Be aware of and identify any 'Red Flags'. Some 'Red Flag' issues include:

1. a transaction involving a country that has a reputation for prevalent corruption.
2. a third party has a close family or personal relationship to a government official.
3. a client or government official is insistent that the third party become part of the transaction.
4. the third-party objects to anticorruption representations in contractual agreements.
5. the third-party requests unusual contract terms or payment arrangements, such as a payment in cash, payment in another country's currency, or payment in a third country.
6. the compensation requested by the third party is disproportionate to the work to be performed.
7. the third party provides only vague details about the work to be performed, makes suspicious statements about its method of operating, or is otherwise evasive or secretive about its activities.
8. the third party is in a different line of business than that for which it has been engaged or otherwise appears unqualified for its role.
9. any fact or circumstance which in your experience doesn't look or seem right.

Refer any relevant search results or 'Red Flags' to General Counsel for review.

If you suspect that someone you are working with, whether a third party or anyone else, might be engaged in bribery, report your concerns immediately to your manager, the DT Global Ethics Hotline or General Counsel, GeneralCounsel@DT-Global.com.

Corruption Laws with International Reach

Legal authorities and international bodies recognize that government corruption damages societies and economic development, and they are taking measures to combat it. The Organization for Economic Cooperation and Development, or OECD, recognized that multilateral cooperation was needed to fight corruption, so an anti-bribery convention was adopted. As a result of the OECD convention and other international agreements numerous countries have adopted new laws or updated existing ones to combat bribery and other forms of corruption. These laws have international reach, that is they extend beyond the boundaries of a country, to govern the operations of companies and individuals in the conduct of international business.

Specific International Corruption Laws

Foreign Corrupt Practices Act, Bribery Act UK & Crimes Act (Cth) Australia

All DT Global businesses, staff, downstream partners and agents are to conduct business in accordance with the requirements of The Foreign Corrupt Practices Act (FCPA) in whichever country they are operating.

Strict compliance is required with the requirements of this Act and all staff are expected to know and understand their obligations. Under the FCPA It is a crime to:

1. offer a gift, payment or bribe, or anything else of value,
2. directly or indirectly, to
3. any foreign official, foreign political party or party official, or candidate for foreign political office

4. for the purpose of influencing an official act or decision, or seeking influence with a foreign government in order to
5. obtain, retain or direct business to the company or to any person.

The following persons are 'Foreign Officials' or 'Government Officials':

1. Employees of a government agency, whether paid or not, regardless of rank, seniority, or position.
2. Publicly funded or state-affiliated entities are considered to be governmental entities, even when the function of the organization does not appear to be governmental in nature for example universities or hospitals.
3. Employees of multi-lateral funding organizations such as the World Bank.
4. Employees of international organizations such as the United Nations.
5. Members of royal families.

Remember: Even if the payment is legal in the host country, it is forbidden by the FCPA, violates the law, and is prohibited by this Code.

The FCPA also requires that DT Global's books and records accurately and fairly reflect all transactions, that we maintain and follow a system of internal controls and that transactions are duly authorised.

Falsely reporting transactions or failing to report the existence of false transactions in the accounting records is prohibited. Staff certifying the correctness of records, including vouchers or bills, should have reasonable knowledge that the information is proper and correct.

Other corruption legislation with an international reach applies to DT Global operations in the European Union, Great Britain, and Australia. Like the FCPA, the U.K. Bribery Act (UKBA) and the Crimes Act (Cth) Australia prohibit bribery of government officials. The UKBA goes further and prohibits *all* commercial bribery.

As an ethical business, DT Global will comply with FCPA, UKBA, the Crimes Act (Cth) Australia, and other applicable anticorruption laws, regulations, and conventions, including the OECD anti-bribery convention; the World Bank Guidelines on Preventing and Combating Fraud and Corruption; Anti- Money Laundering legislation, and all other applicable laws in every country in which DT Global operates.

Remember: Corruption laws have international reach and strict compliance is required.

To protect DT Global's reputation, our clients, and our staff from penalties and imprisonment, DT Global prohibits bribery anywhere in the world, in connection with any kind of business, directly by company personnel or through intermediaries or third parties, and to anyone, whether government officials, commercial employees, or private individuals.

Contact your manager or General Counsel, GeneralCounsel@Dt-global.com if you have any compliance queries.

Working for International Financial Institutions

DT Global is committed to operational excellence and transparency in support of the objectives of International Financial Institutions 'IFIs'. IFI's, such as the World Bank and other bilateral or multilateral development bank or donor agencies, each have their own definitions of what constitutes corruption

which often go beyond the requirements of international anti-corruption laws. In accordance with the requirements of IFI's, DT Global prohibits:

1. Corrupt payments to employees or agents of an IFI.
2. Corrupt payments in relation to IFI-funded projects or services.

DT Global Managers have extra compliance obligations when working on proposals and projects for IFI clients. All key personnel included in proposals for IFI work shall formally agree to working on the project prior to proposal submission and shall complete all assigned training. Changes to key personnel must be approved by the appropriate DT Global manager and the IFI client, in writing. Similarly, changes to approved subcontractors and experts must also be approved by the client in writing.

International Business

DT Global is a global company operating across many countries. We are required to comply with the export control laws and regulations of the United States and other jurisdictions where we do business.

An "export" occurs when a product, service, technology, or piece of information is shipped to a person in another country. In the U.S., an export can also occur when technology, technical information, or software is provided in any way including verbally, to a non-U.S. citizen, regardless of where that person is located. In this regard, an "export" of technical data can occur during meetings, telephone conversations and site inspections and by memoranda, letters, faxes, email, and other written materials.

Staff involved in accepting or processing client contracts and orders, authorizing or processing the international movement of goods or technology, the performance of defense services or any other activity, have an obligation to ensure that they are aware of and comply with the laws that pertain to any international trading activity.

DT Global screens all parties to an order (for example, the customer, the consignee, and the end user) against applicable lists of denied persons and entities and controlled destination countries to ensure compliance with export control laws.

International Sanctions

Countries where we conduct business sometimes impose sanctions or comply with sanctions imposed by multi-national organizations such as the United Nations and the European Union. Sanctions may reflect concerns about national security, terrorism, or foreign policy, or may be adopted in response to international obligations or agreements. Sanctions restrict or prohibit dealings with certain countries or individuals. DT Global must comply with the economic sanctions administered by the United States Office of Foreign Assets Control (OFAC), which include, restrictions on financial transactions, travel, and imports and exports. DT Global also complies with sanctions imposed by other countries and multilateral institutions such as the European Union or World Bank.

International sanctions may also apply to activities such as providing services and exporting sensitive technology. As each sanctions program is based on different foreign policy and national security objectives, the prohibitions vary between programs. Staff handling international business need to be aware of and understand regulations which are updated regularly. Check with your manager if you have any concerns about sanctions compliance.

Boycott Requests

U.S. law prohibits DT Global and its subsidiaries from participating in foreign boycotts that the United States does not sanction. DT Global is committed to full compliance with U.S. anti-boycott laws and regulations. These laws apply to boycotted companies as well as to boycotted countries and their nationals.

DT Global must avoid participating in any illegal boycott. Countries involved in boycotts include Iraq, Libya, Syria, Kuwait, Qatar, UAE, Lebanon, Saudi Arabia, and Yemen. Contracts, tender documents, purchase orders, and all agreements with clients, companies, individuals, or third parties from these countries, should be carefully reviewed to identify potential non-compliant boycott language.

Some examples of non-compliant boycott language include:

1. DT Global shall comply with the laws of [boycotting country]
2. DT Global shall ensure that its personnel, employees, and agents comply with the laws of [boycotting country]
3. DT Global shall abide by all laws, rules, regulations, and decrees concerning the boycott of [boycotting country]
4. DT Global shall observe the laws of [boycotting country]

Any non-compliant language must be amended before the relevant document is signed and before DT Global commences any work. General Counsel will assist in amending the appropriate language in such instances. If the other party does not agree to amend the non-compliant language, DT Global *must not* sign the document and *must not* commence any work with the client or third party.

Remember: Non-compliant language may not be confined to the Middle East and can be found in standard contracts, bids, tenders, contracts in Europe, Asia, Africa, and other geographies.

DT Global must report any boycott requests to the U.S. government. If staff identify non-compliant language, receive a boycott request, or have any questions about boycott activities, please contact General Counsel at GeneralCounsel@DT-Global.com.

11. Gifts & Entertainment

Definition of Gifts

“Gifts” are items and services of value that are given to any outside parties, but do not include items described below:

1. Normal business entertainment items such as modest meals and beverages are not to be considered “gifts.”
2. Items of minimal value, given in connection with sales campaigns and promotions or services, safety or retirement awards are not to be considered “gifts” for purposes of this Code.
3. Contributions or donations to recognised charitable and nonprofit organisations made in accordance with this Code are not considered gifts.
4. As a general guide items or services, with a total value under \$50 per year are excluded but this can vary from country to country. For example, some countries prohibit all gifts to officials while others may have different monetary limits.

Definition of Supplier

“Supplier” includes not only vendors providing services and material to the company, but also consultants, financial institutions, advisors, and any person or institution which does business with the DT Global.

Gifts

No staff or member of his or her immediate family shall solicit or accept from an actual or prospective client or supplier any compensation, advance loans, gifts, entertainment, or other favors which are of more than token value or which the staff member would not normally be in a position to reciprocate under normal expense account procedures.

Under no circumstances should a gift or entertainment be accepted which would influence the staff member’s judgment. In particular:

1. Staff must avoid any interest in or benefit from any supplier that could reasonably cause them to favour that supplier over others.
2. Staff are prohibited from accepting a gift from a person or organization involved in active procurement with DT Global. This prohibition applies to all DT Global tenders, globally.

It is a violation of the Code for any staff to solicit or encourage a supplier to give any item or service to themselves or a family member regardless of its value, no matter how small. Our suppliers will retain their confidence in the objectivity and integrity of our company only if each of us strictly observes this guideline.

Remember: Gifts, business entertainment, or customary gifts may never be provided if they are being offered in exchange for an unfair business advantage or if offering them could create the perception of an improper motive.

Reporting Gifts

Any staff member who receives, or whose family member receives, an unsolicited gift prohibited by these guidelines, should report it to their supervisor and either return it to the person making the gift or, in the case of perishable gift, give it to a non-profit charitable organization.

Discounts

Staff may accept discounts on a personal purchase of the supplier’s or customer’s products only if such discounts are generally offered to others having a similar business relationship with the supplier or customer.

Business Meetings

Entertainment and services offered by a supplier or client may be accepted by staff when they are associated with a business meeting and the supplier or client provides them to others as a normal part of its business – for example meeting for coffee and refreshments to discuss DT Global capabilities and expertise. Meals may be accepted as a standard part of a business event, like a conference or seminar. Any other entertainment or services accepted in the course of business must be of a type which would be allowable and reimbursable as an expense.

Providing Gifts, Entertainment & Travel Costs

Prior to offering any gift or entertainment to any party and in particular to government officials, staff must obtain appropriate approvals from their manager or supervisor and follow all applicable procedures. The

anti-corruption laws in some countries require government officials to obtain permission prior to receiving gifts or entertainment and others set very low thresholds on gift values. As a general rule, gifts to government officials should be avoided.

All gifts must be reasonable and appropriate in the circumstances. Such circumstances include past, pending, or future business dealings with the recipient of the gift. Multiple gifts to the same person, even of small value, may create the perception that they are being given for an improper purpose and should be avoided.

Payments and expenditures for gifts of any value must be fully and accurately recorded in DT Global books and records.

Dt Global may reimburse travel expenses to cover the cost of reasonable and legitimate expenses for government officials and clients or potential clients, when those expenses are related to fulfilling DT Global contractual obligations or developing new business. Legitimate expenses include appropriate class fares, travel costs, and accommodation costs, directly related DT Global contract obligations, business, or business development. The payment of other non-business related expenses such as sightseeing trips, lavish entertainment, travel costs for spouses, family members, or friends are prohibited.

12. Political & Charitable Contributions

DT Global will make any contributions to political parties, party officials, candidates for government, and charities permitted under this Code, in accordance with applicable laws and best practice recommendations. Federal law and many state laws prohibit contributions by corporations to political parties or candidates. The term “political contributions” includes, in addition to direct cash contributions, the donation of property or services, and the purchases of tickets to fundraising events.

Charitable contributions means the provision of monetary donations or anything of value to a charity or for charitable purposes such contributions being reasonable, appropriate, lawful, and are provided in an open and transparent manner and without any expectation of award or retention of business to DT Global. All Charitable Contributions are to be accurately documented in DT Global records.

Due diligence shall be conducted on the recipient of any charitable contribution, prior to obtaining the approval of your Manager. Any ‘red flags’ raised in due diligence shall be referred to General Counsel GeneralCounsel@DT-Global.com for review and resolution.

All approved contributions are to be paid by the appropriate DT Global business. No contributions will be reimbursed through employee expense reports, credit cards, purchase cards, or petty cash. The amount of each contribution shall be charged to the applicable overhead cost code and not to projects.

The following contributions are *prohibited*:

1. contributions to political parties, party officials and candidates for government.
2. contributions to charities at the request of political parties, party officials, or candidates for government.
3. charitable contributions or sponsorship with the intent of receiving an improper benefit from a government official.
4. charitable contributions to individuals, crowd funding platforms, religious organizations, fraternal organizations, labor, or union organizations, political, or lobbying organizations.

5. charitable contributions to conferences, and workshops or seminars not related to DT Global business interests.

Permitted Contributions

Staff may make direct political contributions of their own money, but such contributions are not reimbursable. It is improper for staff to use their position within the company to solicit political contributions from another staff member for the purpose of supporting a political candidate or influencing legislation. It is also improper for staff to make a political contribution in the name of DT Global.

Other charitable contributions to community development, emergency services organizations, postsecondary educational institutions, professional societies, and cultural events are permitted subject to obtaining appropriate approval from your manager.

Sponsorships of private or governmental organization events shall be considered non-political contributions and must be approved by your manager.

13. Conflicts of Interest

All Staff and potential employees are required to disclose actual, perceived, or potential conflicts of interest to a manager as soon as they become aware of the conflict. A conflict may exist in the following situations:

1. Actual Conflict – when there is a direct conflict between your current duties and responsibilities and your private interests.
2. Perceived Conflict – when a person could reasonably perceive that your private interests are likely to improperly influence the performance of your duties.
3. Potential Conflict – when you have a private interest which could conflict with your duties in the future.

There are several situations that could give rise to a conflict of interest. The most common are accepting gifts from other companies, employment by another company, close or family relationships with outside companies, and communications with competitors. A potential conflict of interest exists for staff who make decisions in their jobs that would allow them to give preference or favour to a customer in exchange for anything of personal benefit to themselves or their friends and families. Such situations could interfere with the ability to make judgments solely in the company's best interest.

Relationships with Suppliers & Customers

Business transactions must be entered into solely for the best interests of the company. No staff member can, directly or indirectly, benefit from their position or from any sale, purchase, or other activity of the company. Staff should avoid situations involving a conflict or the appearance of conflict between duty to the company and self-interest.

No staff member who deals with individuals or organisations doing or seeking to do business with the company, or who makes recommendations with respect to such dealings, should:

1. Serve as an officer, director, employee, or consultant; or
2. Own a substantial interest in any competitor of the company, or any organisation doing or seeking to do business with the company. Substantial interest means an economic interest that might influence or reasonably be thought to influence judgment or action but shall not include an investment representing less than 1% of a class of outstanding securities of a publicly held corporation.

Outside Employment

Full-time regular employees, as defined in our employee handbook, must not be employed outside the company:

1. In any business that competes with or provides services to the company;
2. In any business where a conflict of interest could arise in respect to DT Global;
3. In a manner which would affect their objectivity in carrying out their company responsibilities; and/or
4. Where the outside employment would conflict with scheduled hours or the performance of the company assignments. Employees must not use company time, materials, information, or other assets in connection with outside employment.

Consultants and part time staff may be employed outside of DT Global in accordance with the noncompetition terms found in their specific consulting agreements or employment contracts.

14. Confidential Information & Data Privacy

Confidential Information

Confidential information includes all information, whether technical, business, financial, or otherwise concerning DT Global, which the company treats as confidential or secret and/or which is not available or is not made available publicly. It also includes any private information of, or relating to, customer records, fellow staff members, other persons, or other companies, and national security information obtained by virtue of the staff member's position. The release of private or confidential information could harm DT Global, our clients, any individuals involved and may violate the law.

Protecting privacy and confidentiality is also central to DT Global's safeguards incident and Speak Up reporting mechanism and case management process. Confidentiality protects victim/survivors, as well as witnesses and informants. Confidentiality also ensures that the reputation of people involved in an investigation, but not yet known to have caused harm, are protected.

DT Global policy and various privacy and data protection laws protect the integrity of the company's confidential information which must not be divulged except in strict accordance with established company policies and procedures. The obligation not to divulge confidential company information is in effect even though material might not be specifically identified as confidential and the obligation exists during and continues after employment with the company.

A few examples of prohibited conduct are:

1. Selling or otherwise using, divulging or transmitting confidential company information.
2. Using confidential company information to knowingly convert a company business opportunity for personal use.
3. Using, divulging or transmitting confidential company information in the course of outside employment or other relationship or any succeeding employment or other relationship at any time.
4. Reading or discussing a confidential document you may accidentally come across.
5. Disclosing, commenting on, or discussing confidential company information in any form on social media.

The protection of personal data of employees, customers, suppliers, and other third parties is a priority to DT Global. Personal data is defined as any information relating to a person that, either directly or indirectly, can be used to link to that person's identity. In this regard, and although there are special rules to protect privacy when dealing with personal data, as a general rule, collecting, storing, processing, and other use of personal data require the consent of the person concerned, a contractual arrangement or some other legal basis. Access to personal information should be limited to those with a need to know for a legitimate business purpose.

DT Global holds private information about its staff. All staff have a role to play in guarding each other's information if we should encounter it. Always protect private and confidential information from accidental or careless disclosure. If you identify a possible breach or security lapse regarding private or confidential information, promptly take proper action. The obligation to protect confidential company information continues even after employment with DT Global ends.

Do not disclose confidential information to colleagues who do not have a legitimate business need to know. When staff have a business need to disclose confidential information to a colleague or third party, they must ensure that the appropriate confidentiality agreement is in place.

Staff shall not seek out, accept or use any confidential DT Global information of or from a competitor of the company. In particular, should we hire an individual who previously worked for a competitor, we must neither accept nor solicit confidential information concerning that competitor from our staff. Staff requested to work on a project, who have relevant knowledge or information from previous employment should declare the conflict of interest to their manager. Managers should check for conflicts prior to assigning work to new staff and arrange to mitigate any conflicts declared. Appropriate mitigations include assigning the staff member to a different project or otherwise firewalling the staff member from the area of conflict. Any employee or Manager with queries regarding their obligations to disclose or deal with a conflict of interest should contact Generalcounsel@dt-global.com.

The requirement to protect company confidential information does not apply to nor restrict staff, consultants, or subcontractors from lawfully reporting waste, fraud, or abuse related to the performance of a government contract to a designated investigative or law enforcement representative of a government department or agency authorised to receive such information.

If, at any time staff are approached by a government investigator asking questions or requesting production of information or records, contact your manager or General Counsel at GeneralCounsel@dtglobal.com prior to agreeing to comply with the request. In this situation, it is important to protect DT Global's property, data, and legal rights. Staff must preserve all records relevant to any government inquiry. Any information subsequently provided to investigators must be authentic and unaltered. Staff must not alter, conceal, or destroy any documents or records. As a company committed to operating in accordance with the law and the highest ethical standards, DT Global will cooperate with appropriate government investigations into possible violations of the law.

Remember: Records are the property of DT Global regardless of who creates, keeps or updates them.

15. Media/Public Discussions

It is our policy to disclose material information concerning DT Global to the public through specific limited channels only, to avoid inappropriate publicity, and to ensure that all those with an interest in the company will have equal access to information. All inquiries or calls from the media should be referred to the global Director of Communications with a copy to the Managing Director in your business location.

16. Company Assets

Cash & Bank Accounts

All cash and bank account transactions must be handled so as to avoid any question or suspicion of impropriety. All cash transactions must be recorded in the company's books of account. All accounts of DT Global funds shall be established and maintained in the name of the company and might be opened or closed only on the authority of the Senior Management Team.

All cash received shall be promptly recorded and deposited in a DT Global bank account. No funds shall be maintained in the form of cash, except authorised petty cash, and no company shall maintain an anonymous (numbered) account at any bank. Payments into numbered bank accounts by the DT Global might leave that company open to suspicion of participation in a possibly improper transaction. Therefore, no disbursements of any nature might be made into numbered bank accounts or other accounts not clearly identified to the company as to their ownership.

Prevention of Money Laundering

DT Global is committed to help minimize money laundering. "Money laundering" is the process by which a person or group tries to conceal illegal funds or attempts to make the sources of their illicit funds look legitimate. DT Global will always perform due diligence on customers, suppliers, intermediaries, and other business partners who wish to conduct business with us. Staff are to be aware of "red flags" that may signal money laundering activities and ensure that any party with whom we conduct business maintains a physical presence, is engaged in legitimate business, and has proper compliance processes in place. If you need more information about how to identify money laundering, you should consult your manager or General Counsel at GeneralCounsel@dt-global.com.

Some senior staff, company officers, and the directors of DT Global have a special responsibility to promote integrity within our company. Their role requires them to ensure that our financial compliance and records are accurate and complete. In order to do so, these individuals are required to know and understand the financial compliance laws that apply to their work. Violations of financial compliance laws will be viewed as a severe offense that may result in disciplinary action, up to and including termination. This includes failing to report potential violations by others. If you believe that a violation has occurred, contact Senior Management or General Counsel. If you prefer to report on an anonymous basis, you may submit a report by contacting the DT Global Ethics Hotline.

DT Global Assets & Transactions

Compliance with prescribed accounting procedures is required at all times. Staff members having control over company assets and transactions are expected to handle them with the strictest integrity and ensure that all transactions are executed in accordance with management's authorisation. All transactions shall be accurately and fairly recorded in reasonable detail in the company's accounting records.

Staff members are personally accountable for company funds over which they have control. Staff members who spend company funds should ensure the company receives good value in return and must maintain accurate records of such expenditures. Staff members who approve or certify the correctness of a bill or voucher should know that the purchase and amount are proper and correct. Obtaining or creating "false" invoices or other misleading documentation or the invention or use of fictitious sales, purchases, services, loans, entities, or other financial arrangements is prohibited.

Expense Reimbursement

Expenses actually incurred by staff members in performing DT Global business must be documented on expense reports in accordance with company procedures. In preparing expense reports, staff members should review these procedures for the documentation in order to be reimbursed for business expenses.

Software Computers & Network Security

Computer data, information, and software may appear intangible, but they are valuable assets of the company and must be protected from misuse, theft, fraud, loss, and unauthorised use or disposal, just as with any other DT Global property.

Computer technology, hardware, software, networks, and the information that runs on them, are critical to DT Global's growth and success. All staff who use a computer play a role in ensuring these resources operate as they should. All staff must use computers responsibly and primarily for legitimate business purposes and protect and respect the security of DT Global computer systems. In addition, staff must protect information used to access DT Global networks, including IDs and passwords, pass codes, and building-access key cards.

When using DT Global computers, network and systems, staff must *not*:

1. Engage in electronic communications that might be considered offensive, derogatory, defamatory, harassing, discriminatory, obscene, vulgar, or otherwise not in accordance with DT Global values and this Code.
2. Use DT Global electronic communications systems to improperly disseminate copyrighted or licensed materials.
3. Participate in any manner in Internet or other on-line bulletin boards or chat rooms on matters concerning DT Global.
4. Use DT Global electronic communications to transmit chain letters, advertisements or solicitations (unless authorized).
5. Access company records of any kind for personal use.
6. Misappropriate computer space, time, or software by using a computer to create or run unauthorised jobs.
7. Operate a computer in an unauthorised mode or intentionally cause any kind of operational failure.
8. Use DT Global systems and equipment for personal financial gain.

DT Global electronic communications systems, such as e-mail, voice mail, cellular, and line telephone services are to be used primarily for business, and not for personal use. Staff are permitted to use DT Global's internet access, email, paging, fax, and telephone systems for incidental or occasional personal use. The personal privacy of staff is not protected on these systems.

Staff must report any security breaches, phishing emails, the theft or loss of a computer or data to your IT Manager as soon as possible.

17. Conduct

Conduct on Company Business

Dishonest or illegal activities and any conduct in violation of this Code, will not be condoned on DT Global premises, while on company business or representing DT Global or our clients in country, and can result

in disciplinary action, including dismissal, and criminal prosecution. The following illustrates activities that are against DT Global policy, and which will not be tolerated on company premises, in company vehicles, or while engaged in company business:

1. The use of controlled substances, such as drugs or alcohol; the unlawful manufacture, distribution, dispensation, possession, transfer, sale, purchase, or use of a controlled substance;
2. Driving vehicles or operating company equipment while under the influence of alcohol or controlled substances;
3. Illegal betting or gambling;
4. Carrying weapons of any sort on DT Global premises, in company vehicles or while on company business unless specified as a requirement of performance of a contract. Even staff with permits or licenses cannot carry weapons on company property or while on company business.

DT Global reserves the right to inspect any property that might be used by staff for the storage of their personal effects. It is a violation of company policy to store any contraband, illegal drugs, toxic materials, or weapons on company property.

All staff members are required to notify DT Global within five (5) days of any conviction of any criminal statute violation occurring on the job. In addition, any staff member who is convicted of a felony, whether related to these rules or not, shall report that fact.

18. 'Speak Up' Reporting: DT Global Ethics Hotline

DT Global is committed to a 'Speak Up' culture where all staff and those involved with DT Global feel confident and safe raising any issues relating to actual, possible or suspected, wrongdoing, breach of law, best practices, or our policies and procedures, collectively referred to as 'misconduct'. All staff are encouraged to promptly make reports of misconduct, such reports help to identify and deter wrongdoing, in line with DT Global risk management and governance framework as well as support DT Global long-term sustainability and reputation.

Fraud, money laundering, offering or accepting a bribe, non-compliance or breach of legislation or policy, and engaging in detrimental conduct against a person who has made a report, are some examples of misconduct which can be reported.

Reports which relate solely to personal work-related grievances, and that do not relate to detriment or threat of detriment to the person making the report, should be raised and discussed with your Human Resources representative, your manager or by following any applicable Complaints and Grievance procedure.

Specific examples of grievances that may be personal work-related grievances include:

1. an interpersonal conflict between the report maker and another employee;
2. a decision that does not involve a breach of workplace laws;
3. a decision about the engagement, transfer, or promotion of the report maker;
4. a decision about the terms and conditions of engagement of the report maker; or
5. a decision to suspend or terminate the engagement of the report maker, or otherwise to discipline the report maker.

Exception:

A personal work-related grievance may be reported if:

1. it includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed report);
2. the report maker suffers from or is threatened with detriment for making a report.

‘Speak Up’ Protections

Reprisal against any staff member who makes an Ethics Report, the ‘reporter, is strictly prohibited. DT Global does not tolerate acts of retaliation against anyone who makes a report of misconduct or who participates in an investigation of possible wrongdoing. Some examples of reprisal and retaliation include dismissal; injury of an employee in their employment; alteration of an employee’s position or duties to their disadvantage; discrimination between an employee and other employees of the same employer; harassment or intimidation of a person; harm or injury to a person, including psychological harm; damage to a person’s property, reputation; business or financial position; or any other damage to a person.

Reprisal does NOT include administrative action that is reasonable for the purpose of protecting those who make a report from detriment (e.g., moving a report maker, who has made a report about their immediate work area to another office to prevent them from detriment) or managing an unsatisfactory work performance, provided the action is in line with the DT Global performance management framework.

Specific protections available to staff who report misconduct include the following:

1. Confidentiality/ identity protection when it is practical and appropriate in the circumstances;
2. Anonymity;
3. DT Global prohibition on reprisal or retaliation as set out in the Code, local policies, and legislation;
4. Access to Employee Assistance Programs and support.

While DT Global will take all reasonable steps to protect the identity of those who report, others may guess your identity if for example, you previously mention or discuss your intention to make a report, or you are one of a small number of people to have access to the information.

Other specific whistleblower protections contained in legislation may be available to staff depending on the facts of the report and staff location. If staff have any concerns or queries about the availability of whistleblower protections, it is recommended they seek independent legal advice on what whistleblower protections may apply to their circumstances outside this Code.

DT Global will protect those who report misconduct, whether or not the report actually uncovers misconduct, as long as you have honest intentions in making it. Many countries have enacted legislation to protect those who report misconduct. DT Global enforces any applicable protections afforded by such laws. However, making a report which you know is not true or deliberately making a false report is a violation of this Code and will be subject to accountability and disciplinary action.

Reporting Options

DT Global provides all staff including contractors, suppliers, and associates access to an independent, externally managed DT Global Ethics Hotline, to report misconduct. The DT Global Ethics Hotline service provided by Core Integrity can be contacted outside of usual business hours. Using the DT Global Ethics

Hotline enables you to make your report, confidentially; receive updates on the status of the report and provide additional information to the DT Global while remaining anonymous if you choose. Whether or not you choose to report anonymously, your report will be treated confidentially.

When making a report staff can also choose to remain anonymous over the course of the investigation and after the investigation is finalised. Staff may also refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations. If you wish to make a report and remain anonymous, DT Global recommends using the DT Global Ethics Hotline, as this will enable ongoing two-way communication and assist with follow-up questions and feedback.

Reports may be made to the DT Global Ethics Hotline using the phone, email, mail, URL, or QR code (available on printed collateral). The DT Global Ethics Hotline reporting options are set out in the table below:

Reporting Channels	
Dedicated Australian Hotline Phone Number:	1800 765 692
Dedicated USA Hotline Phone Number:	1 (800) 203-7008
Dedicated Spanish Hotline Phone Number:	900 998 400
Any Other Country Hotline Phone Number:	+61 2 9053 9285
Email:	speakup@coreintegrity.com.au
Mail (postal address):	PO Box 730 Milsons Point NSW Australia 1565
Weblink to English/Spanish/French reporting form:	qrs.ly/DTGlobalEthicsHotline

Alternatively, you may choose to make a report internally to your manager, supervisor, safeguarding focal point, a consultants point of contact, senior management, or to General Counsel GeneralCounsel@DT-Global.com.

Further reporting options may be available under the Whistleblower Policies, hotlines, or applicable legislation in your location.

Following a Report

Whether you report via the DT Global Ethics Hotline or using our internal process, DT Global will acknowledge receipt of the report and will contact you during key stages of an investigation such as when the investigation process has begun; while the investigation is in progress; and after the investigation has been finalized.

Investigation Framework

All reports received will be assessed and may be subject to an investigation. The objective of an investigation is to determine whether there is enough evidence to substantiate or refute the matters reported. Any ensuing investigation will be objective, fair and independent, and will preserve confidentiality. To the extent it is practical, investigations will be independent of the report maker, any individuals who are the subject of the report and the department or business unit involved. If considered necessary, DT Global may appoint external investigators. All staff are expected to cooperate in the

investigations of reports. Following an assessment or investigation, DT Global will determine the appropriate corrective actions, such as process improvements, accountability, or discipline measures.

Any staff member who is the subject of a report will be advised about the subject matter of the report as and when required by principles of procedural fairness/natural justice and prior to any adverse findings being made. DT Global will determine the most appropriate time to inform the staff member. Any staff member who is the subject of a report may contact the DT Global Employee Assistance Provider for support services such as counselling.

19. Accountability & Discipline

Each of us is responsible and accountable for compliance with this Code and DT Global policies and procedures. Violation of this Code can result in serious consequences for the company, its reputation, credibility, and the confidence of its clients. Penalties for compliance breaches can include substantial fines, sanctions, restrictions on future operations as well as the possibility of fines and prison sentences for individual staff members.

Managers who condone, permit, or have knowledge of illegal or unethical conduct by those reporting to them and do not take corrective action will be held accountable and subject to disciplinary action. Any disciplinary action will be considered on a case-by-case basis and implemented in accordance with applicable laws, awards, and collective agreements. On the same basis, disciplinary action might also be taken against staff members who make false statements in connection with investigations of violations of this Code.

Accountability actions include re-training, counselling and support, mentoring, reprimands, performance management, relocation, formal warnings, and termination of employment. DT Global in its sole discretion will determine the appropriate accountability and disciplinary action for a given matter. The listing of possible actions is informative only and does not bind the company to follow any particular accountability actions, disciplinary steps, process, or procedure.

DT Global's principles of proper conduct set out in this Code will not be waived in any respect. Violation is cause for accountability and disciplinary action including dismissal or termination of contract. All staff will be held to the standards of conduct described in this Code. DT Global never has and never will authorise any staff member to commit an act that violates this Code or to direct another to do so. Any attempt to justify a violation of the Code by relying on the directions of instructions of another, will not be accepted.

20. Compliance with this Code

Each employee or consultant hired by the company will review the Code of Business Ethics and Conduct and sign the Code's Acknowledgment Form. The Code of Business Ethics and Conduct Acknowledgment Form will be kept on file for all staff members.

Staff who work on projects with DT Global business partners, will upon request also comply with all reasonable policies and procedures of those business partners, for the duration of the project. Should there be any conflict between this Code and the applicable policy of a business partner, staff are to raise the issue immediately with a manager for resolution prior to taking any action.

Remember: The reputation of DT Global and the safety of our staff depend on compliance with this Code. Staff who have any questions or do not understand what is expected, should raise their concerns with their Manager, Human Resources, or General Counsel.

21. Accessibility of this Code

This Code will be posted on DT Global's website and on any intranet and other communications platforms. The Code will also form part of employee induction information, sub-contractor on-boarding, and training for new starters. Training on the Code will be held regularly, and all staff are required to promptly and satisfactorily complete Code training as and when it is assigned.

Version Control and Change History

Version Control	Effective Date	Approved by	Amendment
V 1.0	23 May 2019	DT Global Leadership Team	First Version
V1.3 DRAFT	08 Aug 2019	Approved	Update to align with DT Global Fraud Policy and Anti-Corruption policy
V1.7	13 Jan 2020	Approved	General update to add Corporate Values, amend Speak Up Reporting section, add Accessibility of this Code section and miscellaneous amendments to update to best practices and ensure brand consistency
V2	12 Feb 2020	Approved	Update DT Global Ethics Hotline Contact Information
V3	17 Feb 2023	Approved	Update DT Global Ethics Hotline Contact Information, update Corporate Values, update Child Protection section, update PSEAH section and other miscellaneous amendments

Code of Conduct Certification

I have read the DT Global Code of Business Ethics and Conduct or “the Code” and:

1. I understand that the standards and policies in the Code represent the policies of DT Global and that violating those standards and policies, or any legal and regulatory requirements applicable to my job, may result in penalties set forth in the Code or other appropriate sanction;
2. I understand that there are several sources within the company, including the Company Management, where I can consult if I have questions concerning the meaning or application of the Code or relevant legal and regulatory requirements:

Management, where I can consult if I have questions concerning the meaning or application of the Code or relevant legal and regulatory requirements:

3. I understand that it is my responsibility to disclose to my supervisor or Company Management any situation that might reasonably appear to be a violation of the Code;
4. I understand that DT GLOBAL maintains an anonymous third-party complaint reporting system for reporting suspected violations of the Code. The reporting system can be accessed using the Channel of my choice below:

Reporting Channels	
Dedicated Australian Hotline Phone Number:	1800 765 692
Dedicated USA Hotline Phone Number:	1 (800) 203-7008
Dedicated Spanish Hotline Phone Number:	900 998 400
Any Other Country Hotline Phone Number:	+61 2 9053 9285
Email:	speakup@coreintegrity.com.au
Mail (postal address):	PO Box 730
	Milsons Point NSW Australia 1565
Weblink to English/Spanish/French reporting form:	qrs.ly/DTGlobalEthicsHotline

5. I am not aware of any exceptions to standards and policies in the Code of Conduct except: (if none, so indicate by writing “NONE”.) _____
6. I have no actual, perceived or potential conflict of interest to disclose/ I disclose the following actual, perceived or potential conflict of interest: (provide details)

Signature: _____

Name: _____

Date: _____