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# DT Global Corruption Risk Management Statement

As an organization, DT Global has zero tolerance for corruption in any form. DT Global's commitment to anti-corruption, ethics, integrity, and responsible use of donor funds are key drivers of our culture of ethics and integrity.

In conjunction with our ethics and compliance program, DT Global adopts a risk management approach to detect, assess, and mitigate corruption risks likely to impact different business functions. Corruption risks include fiduciary, legal, operational, information, safety, and reputational risks. Risk management and the daily steps needed to operate compliantly and in accordance with DT Global values are the responsibility of every employee, across all levels of the organization. We encourage and lead a culture of transparency and responsibility for risk management.

## Corruption Risk Management Cycle



# Our Measures to Prevent, Detect, and Respond to Corruption:



## PREVENT

- Leadership governance and risk oversight
- Global and local policies, procedures, and internal controls—Global Anti-Corruption Policy, Fraud Policy, Code of Business Ethics and Conduct, and Risk Management Policy; local policies and procedures
- Donor agency safeguards and best practice procedures (e.g., fraud and procurement procedures)
- Multi-level anti-corruption, bribery, fraud, or security risk assessments
- List of vendors and suppliers that share our ethical values
- Due diligence and third-party risk assessments
- “Speak Up” culture committed to the highest standards of ethics and integrity and complying with whistleblower protections
- Appropriate employee incentive schemes
- Employing local staff to identify, assess, and mitigate risks at the local level
- Considering anti-corruption risks when formulating business strategies
- Know Your Customer, anti-money laundering and anti-terrorism compliance procedures



## DETECT

- Training employees and third parties, including training on anti-corruption, fraud, and DT Global’s Code of Conduct
- Communicating, leading, and rewarding high standards of ethical behavior
- Providing the external DT Global Ethics Hotline and global review of reports supervised by General Counsel
- Monitoring of internal processes and third-party suppliers to prevent corruption risks and detect non-compliance



## RESPOND

- Internal and project site auditing and monitoring
- Investigations manual that sets out procedures for response to reports and complaints supervised by General Counsel
- Remediation and accountability—processes, training, non-compliance sanctions
- Communicating lessons learned and insights from investigations