



DT Global



# Code of Business Ethics and Conduct

January 2026



## A message from the CEO



Here at DT Global, we pride ourselves on conducting our business ethically and with the highest standards of integrity.

Our work spans countries, cultures, and communities all over the world, providing support and services, convening, and brokering partnerships, and making and informing decisions that impact people and their livelihoods. At times, this places us in a position of both perceived and actual power and privilege, which means it is critical to ensure our values and ethics drive every decision and action we take in our business.

Behaviour that is inconsistent with our values, is unethical, unlawful and/or contravenes this Code undermines the positive impact of our work; jeopardises key relationships; and brings the good reputation and standing of DT Global and our clients into question.

The DT Global Code of Business Ethics and Conduct guides how we behave in accordance with our values. It explains the standards of professional ethics and conduct we expect, and which we will hold you to, as a member of DT Global.

Our Code applies to all personnel equally, including company directors, company management, employees, accompanying dependents, stakeholders, consultants, volunteers, and contractors, regardless of which business you work for, your background, or where you are located.

And, importantly, our Code emphasises our Speak Up culture, which encourages and facilitates processes for our staff, clients, partners, and the communities we work with to report breaches of this Code or any other Policy or Procedure, without fear of reprisal for doing so.

A stylized, handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke.

**Torge Gerlach**

Chief Executive Officer

## Who We Are

At DT Global our mission is to shape a future where sustainable development and innovation empower individuals, communities, and nations, fostering inclusive prosperity, social equity, and environmental stewardship.

Our goal is to positively impact 500 million lives by 2045.

Our purpose is creating impact, transforming lives, and partnering for a better world.

We are a values-driven company. Our values underpin both our vision and purpose as well as every decision we make.

Placing values at the centre of all that we do drives our success, motivates our teams, and helps us to build trust with our partners, stakeholders, colleagues, and communities.

## Our Values

Our values collectively inform our Code of Business Ethics and Conduct, and we expect that all personnel, in every position at all levels across the organisation, embody these values and adhere to this Code whilst working for us.



# Our Code of Business Ethics and Conduct

Adherence to our Code of Business Ethics and Conduct ('Code') by all personnel is mandatory. For the purposes of this Code, 'personnel' includes employees, accompanying partners and/or dependents of employees (when working overseas), volunteers, visitors, interns, trustees, board members, sub-contractors, consultants, grantees, associates, and partners including downstream partners.

We recognise that our partners (such as subcontractors and grantees) may also have their own codes of conduct. However, we expect that when working on DT Global business and activities, partners will always behave in a manner consistent with our Code.

Knowing, understanding, and consistently applying the standards of behaviour articulated in this Code – both inside and outside of the workplace – is central to our values and mission and is critical to upholding the good reputation of DT Global and the clients we work for. This is particularly important when travelling or living overseas as conduct of our personnel is often under greater scrutiny in these situations.

This Code has been prepared as a working guide and not as a technical legal document, with emphasis on brevity and readability rather than providing all-inclusive answers to specific questions. There are also a number of geography-specific policies and procedures which operate in conjunction with this Code.

In observance of this Code, there is no substitute for good judgement and common sense. Personnel are expected to comply with both the letter and spirit of this Code and DT Global policies and procedures; uphold local laws and regulations; and consistently reflect on our values and the highest ethical standards as drivers of decisions and conduct.

We are committed to a 'speak up' culture at DT Global. We do not tolerate retaliation in any form against those who have raised concerns or reported suspected violations.

Behaviour that is inconsistent with our values and this Code will result in disciplinary action, which may include dismissal and criminal prosecution. Furthermore, personnel who breach this Code may be considered ineligible to work with DT Global in the future.

## The Code requires all personnel to:

- Act in ways that are consistent with DT Global values, and are lawful, ethical and support the building of trust with key stakeholders.
- Not engage in conduct that could bring the good reputation of DT Global or our clients into disrepute.
- Complete training specific to this Code.
- Speak up and report any suspected or actual breach of this Code or any relevant DT Global policy or procedure.

## Accountability and Discipline

All personnel are responsible and accountable for compliance with this Code and DT Global policies and procedures. Violation can have serious consequences for our company, its reputation, credibility, and the confidence of our clients and communities we work with.

Breaches of this Code will result in disciplinary action, which will be considered on a case-by-case basis and implemented in accordance with applicable laws, regulations (employment awards), and collective agreements. Disciplinary action may include re-training; counselling and support; mentoring; performance management; de-mobilisation; formal warnings; termination of employment; and/or referral to authorities.

The principles of values-based conduct set out in this Code will not be waived in any respect, and all personnel will be held to the standards of conduct described within.

DT Global will never authorise any personnel 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 or instructions of another will not be accepted.

Managers who condone, permit, or have knowledge of illegal or unethical conduct and who do not take corrective action will be held accountable and subject to disciplinary action.

### **The Code requires all personnel to:**

- Be aware of all responsibilities and accountabilities assigned to them under this Code and all DT Global Policies and Procedures.
- Speak up if they believe anyone is attempting to instruct them to breach this Code.

## Diversity, Equity, Inclusion and Accessibility

Diversity, Equity, Inclusion and Accessibility (DEIA) is a core value at DT Global. We proactively encourage equitable participation that reflects diverse perspectives at all levels, and fosters an environment built on tolerance, civility, and respect for individual privacy.

We recognise, respect, and celebrate qualities that are unique to individuals, such as: gender; language; cultural background and ethnicity; age; religion; disability; marital, family or relationship status; sexual orientation and gender identity.

We strive to leverage the full potential of our personnel and create a culture that both values and benefits from diversity, equity, inclusion, and accessibility.

For further information, please refer to our DEIA Policy, as well as geography-specific policies and procedures.

### **The Code requires all personnel to:**

- Show respect for all partners, colleagues, and stakeholders that we work with.
- Foster a safe, inclusive work environment that speaks up against inappropriate behaviour.

# Upholding Human Rights and Combatting Modern Slavery

DT Global is committed to upholding individual human rights, respecting employment laws, and acting in compliance with internationally recognised human rights and labour standards.

We celebrate the unique values, experience and perspectives of Indigenous and First Nations People globally; the wisdom and diversity of their knowledge systems; and their crucial role and leadership in locally-led development.

DT Global opposes and decries all forms of modern slavery, including domestic servitude, debt bondage, deceptive recruitment, forced or compulsory labour, forced marriage, and human trafficking.

We are committed to ensuring that working conditions throughout our supply chain and in every aspect of our operations reflect our commitment to uphold human rights and create a safe working environment.

For further information, refer to the Global Anti-Trafficking and Modern Slavery Policy, as well as geography-specific policies and procedures

## The Code requires all personnel to:

- Ensure that modern slavery risks are identified and managed in our supply chain.
- Comply with all applicable laws, rules and regulations relating to modern slavery, child labour and human trafficking.
- Uphold individual human rights and fundamental freedoms of all, including the rights of First Nations Peoples.
- Complete training specific to human rights and modern slavery.
- Immediately report any suspected or actual human rights or modern slavery abuses.

# Child Protection and Safeguarding

DT Global prioritises the best interest of the child in all our work and has a zero-tolerance approach to child exploitation and abuse.

Every child has the right to health, education, and protection, and DT Global has a role in expanding children's opportunities in life through our work. We will create environments that are safe for children, where they are respected, protected, and empowered.

We recognise that when we support communities – including children – there is an inherent power differential that exists between our personnel and these communities. We are committed to preventing harm and mitigating risks to children and others – including women and vulnerable adults – who may engage with our personnel.

Personnel engaged in conduct prohibited by this Code, our policies and procedures or national laws and regulations will be disciplined, including through termination of contract, and reporting to national or international authorities.

For further information, refer to the Global Child Protection Policy, as well as geography-specific policies and procedures

## The Code requires all personnel to:

- Not engage in sexual relations with children (defined as under 18 years old) regardless of the definition or age of a 'child' in the contexts that we work in. Mistaken belief in the age of a person is not a defence.
- Not produce, access, attempt to access, or disseminate child exploitation material through any medium.
- Not cause harm to any child, through physical, mental, emotional, financial or any other form of abuse or neglect.
- Complete all assigned training specific to child protection.
- Immediately report any suspected or actual breaches of this Code, related procedures, or national child protection laws.

# Protection from Sexual Exploitation, Abuse and Harassment

Sexual Exploitation, Abuse and Harassment (SEAH) causes immense harm and is an unacceptable abuse of power and breach of trust between our personnel and vulnerable, marginalised communities.

At the heart of SEAH is unequal power dynamics, gender inequality and transactional pressures. We recognise that SEAH is disproportionately experienced by women, although other factors – including age, disability, language, displacement, health, and poverty – exacerbates SEAH risks.

SEAH undermines the integrity, credibility, and impact of our work, and has life-long impacts for victims and survivors. We have zero tolerance for personnel engaging in or supporting exploitative, abusive relationships or behaviour.

Recognising the importance of aligning and increasing collective, global efforts to protect against SEAH in our sector, DT Global has endorsed the Common Approach to Protection from Sexual Exploitation, Abuse and Harassment (CAPSEAH) and is deeply committed to its common principles and minimum actions.

Personnel engaged in conduct prohibited by this Code, our policies and procedures or national laws and regulations will be disciplined, including through termination of contract, and reporting to national authorities.

For further information, refer to the Global PSEAH Policy, as well as geography-specific policies and procedures.

## The Code requires all personnel to:

- Not engage in transactional sex at any time, even if legal within the jurisdiction you are working in.
- Not engage in any form of sexual abuse or exploitation of any persons of any age.
- Not have sexual relations with program beneficiaries in exchange for assistance, payments, or any other reason.
- Not engage in sexual harassment, which is unwelcome or uninvited behaviour of a sexual nature which makes a person feel humiliated, intimidated, or offended.
- Complete assigned PSEAH training.
- Immediately report any suspected or actual breaches of this Code, related policies, procedures, or laws relating to sexual exploitation, abuse and harassment.

## Personal Behaviour

When representing DT Global, in particular when travelling, working, and living overseas, all personnel are expected to conduct themselves in a manner that upholds the good reputation of DT Global and the clients and donors we work for.

Personnel should be aware that certain behaviours (for example, sexual promiscuity; aggressive, coarse, or derogatory language; abuse of alcohol and other substances; and certain interactions between males and females) can be areas of particular sensitivity and in some cultures, deemed to be offensive or even illegal. It is important that personnel, their partners and dependents pay particular attention to their personal behaviour and ensure it is sensitive to, and appropriate for, the local context.

For further information, refer to geography-specific workplace behaviour policies and procedures.

## The Code requires all personnel to:

- Understand local laws, customs, and expectations of behaviour prior to any overseas travel representing DT Global.
- Ensure their behaviour is sensitive to, and appropriate for, the local cultural context.
- Not engage in any behaviour that jeopardises the good reputation of DT Global or our clients.

## Environmental Sustainability

Climate change is the single biggest threat facing humanity and is deeply intertwined with global patterns of inequality.

The most vulnerable people – often within the communities and nations we are supporting – are those who disproportionately bear the brunt of climate change impacts yet contribute least to the crisis. DT Global recognises that these communities are best equipped to understand what resiliencies are needed to mitigate climate-related challenges. We remain committed to elevating their voices and supporting them to achieve their climate change adaptation goals.

At DT Global, we are committed to incorporating climate change resilience into our work, and conducting our business in a sustainable, environmentally responsible manner, with a focus on lessening our environmental footprint and ensuring compliance with all applicable environmental laws and regulations.

DT Global promotes the use of environmentally friendly technologies across our operations and endeavours to offset or minimise the effects of climate change in our activities. We are focused on minimising and, if possible, eliminating the use of any substance or material that may cause environmental damage.

### The Code requires all personnel to:

- Comply with all applicable environmental laws and regulations.
- Promote and demonstrate the use of safe technologies and operating procedures in our operations, projects, field offices and to those we do business with.
- Minimise environmental impacts through recycling and reducing waste generation.
- Champion environmental sustainability across our work and with our stakeholders.

## Health, Safety and Security

DT Global is committed to providing a healthy, safe, and secure work environment for our personnel.

We expect all personnel to conduct themselves in a manner that protects the safety, health and well-being of themselves and others in the workplace. We maintain a goal of zero workplace injuries and illnesses, which we believe are largely preventable.

For further information, refer to the Global Safety, Health and Environment Policy, the Global Security Policy as well as geography-specific policies and procedures.

### The Code requires all personnel to:

- Take reasonable care for their own health and safety in the workplace, and the health and safety of others.
- Follow reasonable health and safety instructions from DT Global, including those reflected in policies, procedures, and training.
- Ensure that you are well enough to perform work duties and not adversely affected by alcohol or drugs.
- Ask for help if you do not know how to safely use equipment, perform your work safely or implement safe systems of work.
- Immediately report hazards, unsafe situations, incidents, and injuries.



# Fraud, Bribery, and Corruption

Fraud, bribery, and corruption is illegal and in humanitarian and international development settings diverts much-needed assistance from reaching the beneficiaries most in need. It can severely damage DT Global's reputation and disrupt our business operations, including exposing our company and personnel to criminal prosecution and civil penalties.

DT Global personnel must conduct business ethically and with the highest standards of integrity. We have a zero-tolerance approach to fraud and corruption.

Fraud and corruption can include bribery, facilitation payments, fraud, collusion, coercion, undisclosed conflicts of interest, and misrepresentation and may involve company personnel, intermediaries or third parties, downstream partners, government officials, commercial personnel, or private individuals.

'Facilitation 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. Payments made in these circumstances must be reported to DT Global management immediately.

It is prohibited to offer a gift, payment or bribe, or anything else of value, directly or indirectly, to any foreign official<sup>1</sup>, foreign political party or party official, candidate for foreign political office, or government official for the purpose of:

- influencing an official act or decision; or
- seeking influence with a foreign government in order to obtain, retain or direct business or obtain any type of benefit or advantage to the company or to any person.

For further information, please refer to the Global Fraud Policy and Global Anti-corruption Policy, as well as geography-specific policies and procedures.

## The Code requires all personnel to:

- Adhere to all relevant legislation with respect to fraud, bribery and corruption, including the Foreign Corrupt Practices Act (US), Bribery Act (UK) and the Criminal Code Act (Australia) and Directive 2017/1371 of the European Parliament and the Council of 5 July 2017 on combating fraud affecting the financial interests of the Union through criminal law (EU);
- Directive 2019/1937 of the European Parliament and the Council of 23 October 2019 (Whistleblowing) on the protection of persons who report breaches of Union law (EU)
- Criminal Code (Spain)
- Not obtain a benefit, or cause a loss, by deception or other means.
- Not engage in corrupt conduct, nor encourage others to do so.
- Not engage in bribery of foreign and/or government officials.
- Implement adequate procedures across all business operations to prevent foreign bribery and corruption
- Complete training specific to fraud and anti-corruption.
- Immediately report any suspected acts of fraud, bribery, or corruption.

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<sup>1</sup> The following persons may be 'Foreign Officials' or 'Government Officials':

- Employees of a government agency, regardless of rank, seniority, or position.
- Publicly funded or state-affiliated entities, e.g. universities or hospitals.
- Employees of multi-lateral funding organisations such as the World Bank.
- Employees of international organisations such as the United Nations.
- A member of the executive, legislature or judiciary of a foreign country, including heads of state, ministers and their staff.
- Members of royal families.

Note – definitions of foreign and government officials differ across geographies and legislation. Refer to relevant geographic policies and procedures.

## Conflicts of Interest

All personnel must disclose actual, perceived, or potential conflicts of interest to their manager as they become aware of the conflict. This includes:

- actual conflicts when there is a direct conflict between your duties and private interests
- perceived conflicts when a person could perceive that your private interests may improperly influence performance of your duties; and
- potential conflicts when you have a private interest which could conflict with your duties in the future.

Furthermore, personnel must not improperly use inside information or their position, status, power, or authority:

- to gain, or seek to gain, a benefit or an advantage for the employee or any other person / organisation; or
- to cause, or seek to cause, detriment to DT Global, our clients or any other person / organisation.

For further information, refer to geography-specific policies and procedures.

### **The Code requires all personnel to:**

- Avoid actual, perceived, or potential conflicts of interests.
- If they arise, disclose and document conflicts of interest as soon as you become aware of them.
- If a manager, ensure that conflicts of interests are actively managed.
- Complete assigned training specific to Conflicts of Interest
- Not improperly use inside information or their position to benefit themselves or others, or to disadvantage others.

## Fair Competition

DT Global is committed to conducting our business honestly, directly, ethically, and fairly.

Fair competition is competition that is conducted based on quality, price, and service, complies with antitrust laws, and doesn't resort to unfair or dishonest practices.

### **The Code requires all personnel to:**

- Not discuss matters – including cost information, teaming partners, and company policies – with competitors.
- Never restrict competition by fixing prices, allocating markets or other means.
- Ensure to not arbitrarily refuse to deal with or purchase goods and services from others simply because they are competitors.
- Not require others to buy from us before we will buy from them.
- Be aware of and never engage in industrial espionage or commercial bribery.
- In no circumstances ask personnel to disclose confidential information about the business, processes, or practices of any previous employer.

## Prevention of Money Laundering

DT Global is committed to helping eradicate money laundering, which 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.

We will always perform due diligence on any parties who wish to conduct business with us.

Personnel within DT Global have a responsibility to promote integrity, including ensuring that our financial compliance and records are accurate and complete, and knowing and understanding financial compliance laws that apply to their work.

Violations of financial compliance laws is a serious offense that will result in disciplinary action.

### The Code requires all personnel to:

- Be aware of ‘red flags’ that may signal money laundering activities.
- Ensure appropriate due diligence has been done on all parties we do business with.
- Ensure that any party we conduct business with is engaged in legitimate business.
- Complete training specific to money laundering.

## Gifts, Benefits, and Hospitality

Gifts, benefits, and hospitality (both given and received) have the potential to cause actual or potential conflicts of interest and corruption issues.

‘Gifts’ are items and services of value that are given to, or received, from outside parties.

‘Gifts’ do not include modest business entertainment items (for example, business dinners), items of low value (for example, USD50 is a generally acceptable amount)<sup>2</sup>, or donations and contributions to recognised charities and non-profit organisations made in accordance with this Code.

In some countries, clients and donors prohibit any gifts, benefits, or hospitality to any government official.

For further information, refer to the Global Fraud Policy and Anti-corruption Policy, as well as geography-specific policies and procedures.

### The Code requires all personnel to:

- Not offer, solicit, or accept, from a current or prospective supplier or client, any compensation, advance loans, gifts, entertainment, or other favours above the value indicated above. This applies to immediate family members as well.
- Not accept any gift, benefit or hospitality from a person or organisation involved in any active DT Global tender, in any geography.
- Avoid holding any undisclosed interest in or benefit from any supplier that could reasonably cause that supplier to be favoured over others.
- Immediately report to DT Global if you, or a family member, receive an unsolicited gift, benefit, or hospitality.

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<sup>2</sup> Actual value may be less than USD50, consistent with regional and local policies.

## Political and Charitable Contributions

DT Global maintains a strictly non-partisan position concerning political matters across all our global offices. Our employees are free to hold their personal political beliefs, but within the workplace, we prioritize our shared commitment and dedication to our mission and values.

In many of the countries and territories in which we work, laws prohibit corporations from making contributions to political parties, party officials, and political candidates. 'Political contributions' include direct cash contributions, donation of property or services, and/or the purchases of tickets to fundraising events.

DT Global prohibits all political contributions and donations to political parties or candidates on behalf of DT Global. DT Global also prohibits attendance at political fundraising events on behalf of DT Global, when acting as a representative of DT Global, or when wearing DT Global branded clothing.

'Charitable contributions' means the provision of monetary donations or anything of value to a charity or for charitable purposes. Charitable contributions on behalf of DT Global are permitted, subject to the following:

- the contribution is reasonable, appropriate, lawful, and is provided in an open and transparent manner and without any expectation of award or retention of business to DT Global.
- prior written approval from a relevant senior manager is obtained.
- Blocked party screening and basic due diligence is completed on the charity or recipient organisation.
- the contribution is accurately documented in DT Global records.

Charitable Contributions made at the request of political parties, party officials, or candidates for government are prohibited.

## Due Diligence and Screening

DT Global contracts personnel and third parties all over the world and we hold these partners to the same high standards of ethical conduct and business practices as we do ourselves.

We have a zero-tolerance approach to the support of individuals or organisations involved in terrorist activities, as do the governments and donors with whom we work.

Breaches of this Code, particularly with regards to fraud and bribery, have serious consequences for DT Global, even if the breaches are committed by third parties we deal with.

For these reasons, all personnel and third parties engaged by DT Global must be vetted with appropriate due diligence processes and must be screened against relevant sanctions lists, blocked parties, and denied persons lists.

All personnel must immediately inform their manager or DT Global representative if they become aware of any event or change of circumstance relating to a third party that may result in them being listed on a sanctions list, blocked parties list, denied person list or other similar list.

For further information, refer to geography-specific policies and procedures.

### The Code requires all personnel to:

- Not make any political contributions or donations to political parties, party officials or political candidates on behalf of DT Global.
- Not attend political fund-raising events on behalf of DT Global or when wearing DT Global branded clothing.
- Seek prior approval before making any charitable contributions on behalf of DT Global.

### The Code requires all personnel to:

- Follow due diligence processes, including sanctions and blocked party screening.
- Immediately notify your manager or DT Global representative of any concerns about a third party, including any potential or actual event that may result in their inclusion on a sanctions or blocked party list.



## Procurement

DT Global conducts all procurement with integrity and transparency in pursuit of the best possible value for money for our company, our clients, and our partners.

All DT Global procurement adopts appropriate rigour, accountability, and transparency, and meets necessary health, safety, environmental and legal requirements.

We integrate sustainability, and practice social and environmental responsibility in procurement activities, and 'buy local' wherever possible, supporting indigenous or locally owned business and the communities in which they operate.

For further information, refer to Global Procurement Policy and geography-specific policies and procedures.

### The Code requires all personnel to:

- Procure goods and services using sound business practices, appropriate due diligence and high standards of integrity and transparency.
- Comply with all applicable laws, rules and regulations relating to modern slavery, child labour and human trafficking.
- Identify, where possible, opportunities to engage and partner with indigenous suppliers.
- Require our suppliers and partners to apply similar ethical procurement approaches, and where needed, work with them to build capacity in their approaches.

## Assets, Transactions and Expense Reimbursements

DT Global personnel are personally accountable for company funds over which they have control.

Personnel who spend company funds should ensure DT Global receives good value in return and must maintain accurate records of expenditures.

Approvers of company expenditure must know that this expenditure is proper and correct.

Obtaining or creating false invoices, timesheets or other documentation is strictly prohibited.

For further information, refer to the Global Fraud Policy and geography-specific policies and procedures.

### The Code requires all personnel to:

- Ensure DT Global funds are used in an appropriate manner, representing good value in return.
- Maintain accurate records of time and expenditure, including timesheets, receipts, and vouchers.
- Document expenses incurred in expense reports in accordance with company procedures.
- Not approve any expenditure unless it is supported by accurate and correct documentation.

## Data Protection and Use of IT Resources

Computer data, information and software are valuable assets of DT Global and should not be misused – whether by theft, fraud, loss or unauthorised use or disposal.

DT Global computers and 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. If used occasionally for personal use, note that privacy is not protected on these systems.

DT Global monitors the use of our networks and systems. Inappropriate or unauthorised use, including access or attempted access to prohibited content, will be investigated and may result in disciplinary action including termination and/or referral to authorities.

For further information, refer to Information Technology policies.

### The Code requires all personnel to:

- Not engage in electronic communications that might be considered offensive, derogatory, defamatory, harassing, discriminatory, obscene, vulgar, or otherwise unauthorised and not aligned with DT Global values and this Code.
- Not use DT Global IT systems or electronic communications systems to access or distribute prohibited content or improperly disseminate copyrighted or licensed materials.
- Not access company records or use DT Global systems and equipment for personal financial gain.
- Report any security breaches, phishing emails, the theft or loss of a computer or data to your IT Manager as soon as possible.

## Ethical Use of Artificial Intelligence

DT Global is committed to promoting the ethical and responsible use of Artificial Intelligence (AI) generative technologies in our business.

We recognise that we have a role to play in harnessing the potential of generative AI, whilst minimising risks and contributing to a positive and inclusive AI ecosystem.

For further information, refer to the Global AI Policy and geographic-specific policies and procedures.

### **The Code requires all personnel to:**

- Comply with applicable laws, regulations, and treaties.
- Not employ generative AI for any malicious, harmful, illegal, or unethical purposes.
- Ensure transparency and disclose the use of generative AI technologies.
- Validate and verify information generated by AI prior to sharing with external or internal stakeholders, or publishing.
- Handle and process data used for generative AI purposes in accordance with applicable privacy and security regulations.

## Media and Public Discussions

DT Global uses specific channels to disclose material information concerning our business to the public, to ensure accurate information is shared, and that all those with an interest in the company have equal access to information.

All inquiries or calls from the media should be referred to the Managing Director in your business location.

Any social media posts (blogs, articles) made by personnel mentioning or referring to DT Global must comply with applicable social media policies; DT Global Branding Guidelines; and as appropriate include a disclaimer that their views are their own and do not reflect the opinions or positions of DT Global.

For further information, refer to DT Global Branding Guidelines and geography-specific policies and procedures.

### **The Code requires all personnel to:**

- Refer any media enquiries to the Managing Director in your business location.
- Ensure DT Global and personal social media posts adhere to Branding Guidelines.
- Include a disclaimer on personal social media accounts, blogs or articles.

## Investigations – Internal, External and/or Government

Investigations into allegations of misconduct by personnel may be undertaken by internal or external investigators to ascertain whether personnel have acted in a manner that violates this Code, DT Global values, or related policies and procedures.

Where criminal activities are discovered, these matters will be referred to relevant authorities.

Investigations are carried out in a timely, fair, objective, and confidential manner. Any investigation into breaches of DT Global's Anti-Trafficking and Modern Slavery, Child Protection, or PSEAH policies or procedures will adopt a victim / survivor-centred approach, with the principle of Do No Harm at the centre of all considerations.

DT Global will ensure that all cases investigated reach a conclusion and that relevant parties – including victim / survivors – are provided with information on the progress of an investigation, including outcomes where appropriate.

All investigations will be conducted in line with the principles of procedural fairness. All records relevant to any investigation must be preserved and must not be deleted, altered, concealed, or destroyed.

Personnel involved in internal investigations must be truthful and candid in their responses and will not be subject to any form of retaliation for assisting and answering questions.

DT Global will cooperate with any appropriate government investigations into possible violations of the law. Personnel approached by a government investigator should contact their manager, or the Managing Director or Legal Counsel in their geography prior to agreeing to comply with the request.

### **The Code requires all personnel to:**

- Follow the instructions of relevant DT Global personnel managing investigations. This may include instructions specific to maintaining confidentiality, preserving, and sharing information, or work arrangements.
- Cooperate with internal or external investigators, providing factual and truthful information where requested.
- Contact your manager, Managing Director or Legal Counsel if approached to participate in a government investigation.

## 'Speak Up' Reporting – Our Ethics Hotline

DT Global is committed to a 'Speak Up' culture where all personnel and those working with us feel confident and safe raising any issues relating to misconduct or any actual, potential, or suspected breaches of this Code, DT Global policies or procedures or laws.

If you see or experience something that you suspect may be a breach of this Code, or of any DT Global policies or procedures, you must report it.

DT Global prohibits any form of reprisal or retaliation (such as dismissal, harm or injury, harassment, or intimidation) against any person making a report.

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

- Confidentiality / identity protection when it is practical and appropriate in the circumstances.
- Anonymity, if requested or required.
- Prohibition on reprisal or retaliation as set out above, in legislation and in DT Global policies and procedures.
- Access to Employee Assistance Programs and support.

Making an allegation which is found to be without substance, and which is knowingly false, vexatious, or malicious, may be treated as a breach of this Code.

Reports relating solely to personal, work-related grievances where there is no concern or threat to the person making the report should be raised and discussed with your Human Resources representative or manager.

For further information, please refer to our Speak Up Policy and geographic-specific policies and procedures.

Reports requiring anonymity can be referred to the DT Global Ethics Hotline, independently administered by Core Integrity, using one of the following contact options.

### URL

[qrs.ly/DTGlobalEthicsHotline](https://qrs.ly/DTGlobalEthicsHotline)

### QR Code



### Email

[speakup@coreintegrity.com.au](mailto:speakup@coreintegrity.com.au)

### Phone

1800 765 692	Australia
900 998 400	Spain
+1 (800) 203-7008	USA
+44 800 206 1749	UK
+61 2 9053 9285	Rest of World

## 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
V4	13 Jan 2026	COO	Full Policy re-write





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