

DT Global Anti-Corruption Policy (Global)



DT Global

1. Background

DT Global delivers international development services globally, working with clients in the public and private sectors to achieve a positive and lasting impact on the lives of people around the world. DT Global recognizes that corruption harms people, businesses, economic development, and society, and is committed to conducting business with the highest standards of integrity without corruption.

2. Policy Statement

DT Global conducts its business in an ethical manner and with the highest standards of integrity. We have a 'zero tolerance' approach to corruption and fraud.

We conduct our business without corruption or bribery and act in accordance with international and domestic anti-corruption laws and conventions. DT Global prohibits its staff, partners, and third parties from engaging in any form of corrupt behavior. We proactively identify, manage, and mitigate corruption risks in accordance with best practice and this policy. In doing so, we maximize the effectiveness of the programs we manage, and we protect the resources and reputation of DT Global, our staff and our clients.

3. Purpose and scope

The objective of this policy is to apply a 'zero-tolerance' approach to corruption across all work that we undertake and ensure that DT Global takes all possible steps to prevent, detect, mitigate, and report any instances of corruption or bribery.

This DT Global Anti-Corruption Policy applies to all DT Global operations, including its staff and all third parties conducting business with and on behalf of DT Global (employees, volunteers, visitors, interns, trustees, board members, directors, stakeholders, subsidiaries, sub-contractors/consultants, associates, and partners including downstream partners and grantees).

This policy is intended to be read in conjunction with the:

- DT Global Anti-Corruption Procedures (Global)
- DT Global Code of Business Ethics and Conduct
- DT Global Fraud Policy; and
- DT Global Fraud Control Procedures for each geography.

4. Definition of Corruption

Corruption is a type of fraud, defined as ‘the abuse of entrusted power for private gain’¹. DT Global prohibits staff and third parties from engaging in all forms of corruption. For the purposes of this Policy, ‘Corruption’ includes the following types of prohibited behavior:

Bribery - offering, promising, or giving a bribe, anything of value, or illegal inducement to government officials or anyone else, in the course of business. DT Global prohibits the offer or acceptance of bribes anywhere in the world, in connection with any kind of business, directly by staff or through intermediaries or third parties, and to anyone, whether government officials, commercial employees, or private individuals. Payment of bribes to employees or agents of donors and International Financial Institutions (IFI’s) or in relation to any donor or IFI funded projects or services, are also specifically prohibited.

Third Party Bribery – offering, promising, or giving a bribe, anything of value, or illegal inducement to a third party when an employee involved in the transaction knows or should have known that the money or other thing of value will be given or offered to a government official or private client to obtain an unfair advantage, is prohibited. Third Parties include sponsors, advocates, lobbyists, business development consultants, marketing consultants, sales agents, representatives, client relationship managers, freight forwarders, customs clearance agents, and travel agents. Using any third party to attempt to circumvent anticorruption laws or DT Global policies is prohibited.

Facilitation payments - paying an official to do something within their normal duties. These payments are prohibited even if they are not illegal in all countries. Report any requests for facilitation payments to General Counsel.

Fraud - a crime which involves dishonestly obtaining a benefit, or causing a loss, by deception or other means. Also refer to the DT Global Fraud Policy.

Collusion and bid rigging – when businesses which should be competing through a bidding process conspire to set or affect the prices of goods or services. Staff are prohibited from colluding on project bids or engaging in other improper bidding practices such as price fixing, bid suppression, complementary bidding, bid rotation, or market division.

Coercion – exercising undue influence or the improper use of authority, information, physical force, or other advantage to obtain or retain business.

Misrepresentation – making false or misleading representations about staff and services to clients or prospective clients, including knowingly misrepresenting the qualifications or experience of staff or DT Global, or the progress of work, etc.

Altering or falsifying books and records for the purpose of concealing corrupt activity.

Any form of **inappropriate inducement** including:

- seeking to influence the decisions of public officials for example, by providing jobs or internships for unqualified relatives
- Lavish entertainment, or inappropriate or sexually themed entertainment.
- Frequent or extravagant gifts to public officials or relatives of public officials
- Paying non-business-related expenses – such as paying for tourist travel or non-business airfares
- Loans to or from public officials or relatives of public officials

¹ Transparency International

5. DT Global Anti-Corruption Principles

At DT Global we will:

- Act in an ethical manner always, even if there is a cost to doing so.
- Be aware of corruption risks where we do business - refer to the Transparency International Corruptions Perception Index or similar materials.
- Proactively identify, manage, and mitigate corruption risks wherever we do business and set the expectation that our partners, business associates, and third parties will do the same.
- Promptly (within 1 day) report any potential, suspected, or actual corruption, bribery, or attempted bribery – see reporting options below.
- Investigate all reports of corruption and take appropriate action to ensure accountability.
- Build capacity in others we work with, promoting awareness of the impacts of corruption, our 'Zero Tolerance' approach to corruption, and our policies and procedures.
- Ensure anyone who reports claims of corruption, bribery, or fraud does not face any retaliation in relation to their employment or engagement with DT Global.

6. How to comply



7. Availability and Further Information

This policy is available on Teams Global – Info Hub and on the DT Global website <https://dt-global.com/>. For further information contact your manager, Human Resources representative, or General Counsel.

The following documents provide useful resources to guide implementation of this policy:

- DT Global Anti-Corruption Procedures (Global)
- DT Global Code of Business Ethics and Conduct
- DT Global Fraud Policy
- DT Global Fraud Control Procedures for your geography

Further information:

- Organization for Economic Cooperation and Development (OECD) Convention on Combatting Bribery of Foreign Public Officials https://www.oecd.org/daf/anti-bribery/ConvCombatBribery_ENG.pdf
- Foreign Corrupt Practices Act 1977 US - resource guide <https://www.sec.gov/spotlight/fcpa/fcpa-resource-guide.pdf>
- Criminal Code (Cth) Australia – fact sheet <https://www.ag.gov.au/crime/foreign-bribery>
- Bribery Act 2010 UK – guidance <https://www.sfo.gov.uk/publications/guidance-policy-and-protocols/bribery-act-guidance/>

If you have a question or any feedback to share, please contact DT Global General Counsel (generalcounsel@dt-global.com)

Version Control and Change History

Version Control	Effective Date	Approved by	Amendment
V 1.0	9 Sep 2019	Frank Maiolo	First Version
V2.0	13 Jan 2020	Torge Gerlach	Amended to global policy
V3.0	13 August 2020	Torge Gerlach	Updated references to DT Global Anti-Corruption Procedures (Global)