



Diamond
Couriers

ANTI CORRUPTION POLICY

Introduction

Corruption and bribery are illegal and unethical. They destabilise communities, undermine the rule of law, and pose serious threats to sustained economic progress and the healthy operation of markets. Failure to address the risk of corruption and bribery may undermine our reputation and lead to investigations, fines and/or other penalties for the company and/ or individuals. We do not engage in corruption and we never pay bribes, regardless of local custom or practice. Diamond Courier's position on corruption is clear: the offer, payment, authorisation, solicitation and acceptance of bribes and other improper advantages is unacceptable. This Anti-Corruption and Bribery Policy sets out our approach to the prevention of bribery and other forms of corruption.

Who does this apply to?

This policy applies to all employees, directors and officers, as well as contractors under Diamond Courier's Ltd direct supervision, working for a Diamond office or industrial asset directly or indirectly controlled or operated by Diamond Couriers Ltd. We assert our influence over joint ventures we don't control or operate to encourage them to act in a manner consistent with our Values and Code.

We do not tolerate bribery of any kind, whether to a public official or a private individual. We never offer, provide or authorise bribes of any kind, including facilitation payments, either directly or indirectly, to a public official or a private individual. We never request or accept bribes of any kind, either directly or indirectly. A bribe may be monetary or non-monetary, tangible or intangible. A bribe may take the form of, or be facilitated through:

- payments of money
- gifts or entertainment
- discounts, loans and/or financing given on non-commercial terms
- rebates or kickbacks in relation to services provided
- overpayments to business partners
- use of assets at a discount or free of charge
- sponsorships, charitable contributions and community investments
- political contributions
- employment or internships, or information or assistance.

To manage our bribery and corruption risk, we implement a range of procedures and controls relating to dealings with gifts and entertainment, our business partners, sponsorships and donations. We remain alert to corruption and bribery red flags.

Gifts and entertainment

The proper management of the giving and acceptance of gifts and entertainment is key to avoiding the risk they present of actual or perceived bribery or corruption. We only give or accept gifts and entertainment that are:

- In good faith, occasional, reasonable and appropriate
- a normal business courtesy, and transparent.

We don't give or accept gifts and entertainment:

- with the intent or prospect of influencing decision-making or other conduct
- with the intent obtaining any improper or undue advantage
- which are reasonably capable of being regarded in any way as a bribe, or
- in the form of cash, which includes prepaid cards or gift cards which can be redeemed for cash.

Speaking openly

We are each responsible for ensuring that we meet our commitments. Diamond Couriers Ltd expects its employees and contractors to speak openly and raise concerns about possible breaches of the Code of Conduct and this policy with their manager, supervisor or via other available reporting channels. Our Raising Concerns platform is available to employees, contractors and external parties. Diamond Couriers takes concerns seriously and handles them promptly. We have zero tolerance for retaliation against anyone who speaks openly about conduct they believe is unethical, illegal or not in line with our Code of Conduct and policies, even if the concern isn't substantiated, as long as they have not knowingly made a false report.

Consequences

Our policies support our Values and Code of Conduct and reflect what is important to us. We take breaches of our policies seriously. Depending on the severity of the breach, consequences may range from a warning to termination of employment.