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DONCASTERS

GLOBAL ANTI-BRIBERY & ANTI-CORRUPTION POLICY

POLICY NAME
Global Anti-Corruption Policy
PURPOSE
This Policy provides general guidance and information on the existing procedures to ensure compliance with the relevant anti-corruption laws and regulations worldwide.
OBJECTIVES
The objectives of this Policy are:
<ol style="list-style-type: none"> 1. To raise awareness of the Company’s existing internal methods to fight corruption. 2. To provide a clear and consistent framework which allows the Company’s employees to report any breach or potential breach of this Policy or any relevant regulation. 3. To comply with local laws in every country where we operate.
AUDIENCE
The policy applies to all companies within the Doncasters Group, including all operating companies under the operational control of Alloy Topco Limited.
In the following document a Doncasters Group entity is referred to as “Doncasters” or “the Company” interchangeably.
Doncasters is committed to ensuring that its stakeholders, including but not limited to its suppliers, consultants, and advisors, uphold the principles set out in this policy and adopt similar policies within their operations.
INCLUDED IN THIS POLICY IS
<ol style="list-style-type: none"> 1. Definitions 2. Due Diligence and Risk 3. How Does Doncasters Fight Against Bribery? 4. Responsibility for Compliance 5. Reporting Mechanisms
CONFIDENTIALITY STATUS
Public
LOCAL ADAPTATION AUTHORISATION
Yes, if more restrictive

DOCUMENT OWNER
Legal, Compliance & Risk
DOCUMENT REVIEWER
Executive
DOCUMENT APPROVER
Board of Directors
INTRODUCTION
<p><i>“Upholding high standards of business conduct means understanding and being accountable for our actions and the impact of what we do”</i></p> <p style="text-align: right;"><i>Mike Quinn, CEO</i></p>
<p>Doncasters is committed to respecting and promoting the highest standards of ethical behaviour in line with our Code of Conduct and our Values.</p> <p>The Company is committed to instilling a strong anti-corruption culture and is fully committed to compliance with all anti-bribery and anti-corruption legislation and ensures that no bribes or other corrupt payments, inducements of similar are made, offered, sort or obtained by us or anyone working on our behalf.</p>

DEFINITIONS	
Bribery	Bribery is defined as a payment, offer, authorisation or promise to pay money or anything of value, to obtain an undue advantage for oneself, for another person or for the Company, by ensuring or inducing another party in the public or private sector to engage in improper conduct, whether legal or professional.
	<p>Bribery in the public sector, which is often referred to as “Bribery of Foreign Public Officials” or “Public Bribery”, involves:</p> <ul style="list-style-type: none"> ▪ a payment, offer, authorisation or promise to pay money or anything of value ▪ to a government official or to any other person in the knowledge that the payment or promise will be passed on to a foreign official ▪ with a corrupt motive ▪ for the purpose of (a) influencing any act of that person (b) inducing that person to carry out or omit to carry out any action in breach of their lawful duty, (c) securing an improper advantage, or (d) inducing that person to use their influence to alter an official act of decision; ▪ to assist in obtaining or retaining business or an advantage in the conduct of business for or with any person.
employee	‘employee’ shall mean and include any person on the active payroll of the Company including managers and workers, those on deputation, contract, temporary, part time, apprentices, trainees or working as consultants.
DUE DILLIGENCE AND RISKS	

In all transactions, dealings with officials, and other business matters concerning third parties, the following issues should be carefully considered:

1. territorial risks, particularly the prevalence of bribery and corruption in a particular country
2. cross border payments, particularly those involving territories falling under point 1 above
3. request for cash payment, payment through intermediaries or other unusual methods of payment
4. activities which require the Company and/or others to obtain permits or other forms of official authorisation
5. transactions involving the import or export of goods.

CONSEQUENCES OF BRIBERY

The Company and/or employees within the Company could be found guilty of bribery and may face fines and/or prison terms. In addition, high legal costs and adverse publicity are likely to result.

We will take any allegations of bribery extremely seriously and employees who fail to comply with this Policy will be subject to disciplinary action.

HOW DOES DONCASTERS FIGHT AGAINST BRIBERY?

Top Level Commitment

The management of Doncasters is fully committed to complying with all applicable anti-corruption laws and does not pay bribes, kickbacks, or facilitation payments at any time, for any reason.

This commitment applies to government officials and non-government officials.

We expect all employees, third parties or any person or firm representing Doncasters to always comply with this Policy. No acts of bribery and/or corruption committed by an employee or third party when providing goods and/or services to Doncasters, as well as representing or acting on behalf of Doncasters will be tolerated.

Doncasters has a responsibility to exercise due care in selecting and monitoring those acting on its behalf to prevent bribery. The use of third parties must be justified and documented and third parties need to be scrutinised prior to contract award and any financial commitments. All Doncasters' employees should ensure that, when negotiating or renewing an existing agreement with third parties, the agreement includes anti-bribery and corruption provisions approved by the Legal team.

Books and Records/Internal Controls

Doncasters maintains a system of internal controls necessary to ensure that its financial records accurately and fairly reflect its transactions and dispositions of assets; that its resources and assets are only used in accordance with directives and authorisations by the board of directors and senior management; and that checks and balances are employed so as to prevent/by-passing or overriding of these controls.

All financial transactions must be properly and fairly recorded. Any payments must be justified by accompanying contract, invoice and receipt. Invoices and receipts must reflect the true nature of the financial transaction. All books and records will be open to inspection by the board of directors, auditors, internal auditors and any other party entitled to do so. No payment should be made where there is no proper contract, purchase order, invoice or receipt.

RESPONSIBILITY FOR COMPLIANCE

This Policy applies to all employees and other stakeholders, and it is everyone's responsibility to ensure that bribery is prevented, detected, and reported in accordance with this Policy.

REPORTING MECHANISMS

Reporting to Management

If any employee believes they have been or are being subjected to conduct in breach of this Policy, they should bring it to the attention of their line manager.

Reporting to HR

If an employee does not feel comfortable raising the issue their line manager, either because of an existing or potential conflict of interest or because of the fear of retaliation, then they can report the matter to their Human Resources representative.

Reporting to the General Counsel & Chief Risk Officer

If an employee does not feel comfortable raising the issue to their line manager, either because of an existing or potential conflict of interest or because of the fear of retaliation, they can report the matter to the General Counsel & Chief Risk Officer.

Other stakeholders can also report issues and concerns directly with the General Counsel and Chief Risk Officer, who can be contacted via hbarrett-hague@doncasters.com.

Report through Speak Up

Employees and other stakeholders can also report breaches of this Policy via the Speak Up service.

The Speak Up service is run by a company called Navex and is an external, independent reporting service designed for employees and others to report anonymously any breach of Law, our Code of Conduct, Corporate Values and related policies or directives, including this one, while complying with local regulations.

Details of the contact details can be found in our Code of Conduct, on posters around each site, on the Employee App and on SharePoint.

REPORT ONLINE

www.doncasters.ethicspoint.com

REPORT BY PHONE

From the UK:

Call: 0800 890 011

(when prompted, dial: 833 537 0829)

From the USA:

Call: 833-537-0829

From Germany:

Call: 0800 225 5288

(when prompted, dial: 833 537 0829)

From India:

Call: 000 800 050 3406

From Mexico:

For outside calls, dial your local access code followed by 800-288-2872.

Por Cobrar Spanish: 800-112-2020

(when prompted, dial: 833 537 0829)

From China:

For an outside line, dial the direct access number for your location:

China (Southern): 10-811

China (Northern): 108-888

(when prompted, dial: 833 537 0829)