



# EMPLOYEE CODE OF CONDUCT



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## CONTENTS

1.	INTRODUCTION .....	2
2.	SCOPE .....	2
3.	RESPONSIBILITIES .....	3
4.	DUTY TO REPORT .....	3
4.1.	DUTY TO REPORT VIOLATIONS .....	3
4.2.	DUTY TO REPORT CONTACTS.....	3
4.3.	COOPERATION IN INVESTIGATIONS.....	3
5.	ANTI-RETALIATION .....	4
6.	PROHIBITED BEHAVIOUR .....	4
7.	ANTI-BRIBERY AND CORRUPTION.....	5
8.	COMPETITION AND ANTI-COMPETITIVE BEHAVIOUR .....	5
9.	GIFT GIVING AND ENTERTAINMENT .....	6
10.	CONFLICT OF INTEREST .....	6
11.	MONEY LAUNDERING, PROTECTION OF ASSETS AND INTELLECTUAL PROPERTY.....	6
11.1.	MONEY LAUNDERING .....	6
11.2.	INTELLECTUAL PROPERTY AND PROTECTION OF ASSETS .....	6
12.	CONFIDENTIALITY .....	7
13.	EXPENSES .....	7
14.	DATA PROTECTION .....	7
15.	ANTI-SLAVERY AND HUMAN TRAFFICKING .....	7
16.	FAIR WORKING CONDITIONS AND REMUNERATION .....	8
17.	ANTI-HARASSMENT AND DISCRIMINATION .....	8
18.	FREEDOM OF ASSOCIATION .....	8
19.	HEALTH AND SAFETY.....	8
20.	ENVIRONMENTAL PROTECTION .....	8
21.	BREACHES OF POLICY.....	9
22.	REVIEW AND AMENDMENTS.....	9



# EMPLOYEE CODE OF CONDUCT

## 1. INTRODUCTION

This Employee Code of Conduct (the “Policy”) forms part of the terms and conditions of employment of each and every employee. Dornan requires all staff to display a primary duty of care to Dornan in respect of business ethics, to protect confidential commercial information and to ensure our continued business success and growth.

This Policy represents a summary of our most important ethical principles and is intended to provide a clear understanding of your expected conduct. Please note this Policy is not all-inclusive and cannot predict every situation or list every potential requirement. This Policy is never a substitute for common sense and good judgement. If you are unsure or unable to determine the appropriate course of action, stop and talk with your manager. If the situation is still not resolved, please reach out to the Legal, Compliance and Data Protection department for guidance, [compliance@dornangroup.com](mailto:compliance@dornangroup.com).

It is Dornan Policy to continually conduct business with honesty, integrity, and in compliance with all legal and ethical standards. Employees must also adhere to the highest standards in respect to commercial activities with clients and suppliers, in addition to the previously established policies.

Dornan is committed to policies and practices that provide equality of opportunity for all, protect the dignity of employees and promote respect for others at work. All employees are required to take personal and individual responsibility to comply with these policies. Behave in a non-discriminatory way and not to participate in any acts of inappropriate behaviour, harassment or bullying. All employees must have due regard for the health and safety of themselves, their colleagues and the workplace in general.

## 2. SCOPE

This Policy applies to all of Dornan’s employees, contractors, subcontractors, third-parties, clients and stakeholders who work with or on behalf of Dornan.

This Policy also applies to all systems, products and services used within Dornan, whether managed by the Legal, Compliance and Data Protection department or other business units within Dornan.



### **3. RESPONSIBILITIES**

Every employee serves as a representative of Dornan to colleagues, clients, potential clients, business partners and community members. As an employee of Dornan, your words and actions reflect directly upon how you and Dornan are perceived. You are obligated to act with honesty, integrity, transparency and follow the rules and guidance in this Policy.

You are required, as a condition of your employment, to become familiar with, know, understand, and agree to follow this Policy.

If you have any questions or concerns about the Policy and its meaning, please send an email to [compliance@dornangroup.com](mailto:compliance@dornangroup.com).

### **4. DUTY TO REPORT**

#### **4.1. DUTY TO REPORT VIOLATIONS**

All employees of Dornan have a responsibility to report breaches of this Policy as quickly as possible through Dornan's Protected Disclosure channel. This can be found on the Legal, Compliance and Data Protection page on Dornet.

Any known violations of the law or this Policy must be reported by the employee to their immediate manager and to the Legal, Compliance and Data Protection department.

The failure to report a known violation of the law or this Policy effectively condones the conduct in question and will be considered a violation of this Policy.

#### **4.2. DUTY TO REPORT CONTACTS**

Employees of Dornan are required to notify their supervisor and the Legal, Compliance and Data Protection department if they have received communication from any government or local authority regarding any issue related to Dornan's business, reputation, or operations.

This includes if an a request for interview, questioning or any other form of contact by a Government authority or official in regard to any matter that relates to Dornan, joint venture partners, subcontractors, vendors, clients or employees.

#### **4.3. COOPERATION IN INVESTIGATIONS**

There will be occasions when it is necessary for Dornan to investigate issues of concern or allegations regarding possible violations of this Policy or the law. These investigations are necessary to enable Dornan to determine whether there is legal risk.



Employees are required to cooperate with the individuals conducting the investigation. Employees are also expected to provide requested documents, answer questions honestly and in a forthright manner. Knowledge of any such investigations must be kept confidential and may not be shared with others inside or outside of Dornan, unless given specific permission to do so by the Legal, Compliance and Data Protection department.

## **5. ANTI-RETALIATION**

Dornan takes pride in maintaining an environment where employees are encouraged to speak up. There will be no retaliation against any employee who, in good faith, reports a violation of law or this Policy.

Dornan is committed to protecting those who:

- Make a good faith report about potential misconduct. “Good faith” means the person brought forward what they know, in a sincere and honest report, regardless of whether the conduct turns out to be unethical;
- Raise a concern or seek guidance about an issue; and
- Cooperate in an investigation of potential misconduct.

Allegations of retaliation will be investigated and, where substantiated, met with disciplinary action, up to and including termination.

If you know or suspect that retaliation has occurred, report the matter immediately to a direct line manager or to the Legal, Compliance and Data Protection department by email [compliance@dornangroup.com](mailto:compliance@dornangroup.com).

## **6. PROHIBITED BEHAVIOUR**

Dornan employees are prohibited from the following behaviour:

- Unwelcome conduct that is based on a person’s protected status – gender, age, race, disability, sexual orientation and religion or belief.
- Abusive language, physical aggression, deliberately causing injury to another or any disorderly conduct or malicious disturbance. This includes intimidation or harassment of others.
- Sexual harassment. This includes unwelcome sexual advances, request for sexual favours, as well as other physical, verbal or visual conduct based on sex.



- Substance abuse – whether alcohol or drug abuse – it poses a serious threat to the safety, health and productivity of employees and customers. Any employee or visitor under the influence of alcohol is prohibited from entering the workplace engaging in Dornan business or operating Dornan equipment.

## **7. ANTI-BRIBERY AND CORRUPTION**

Corruption is the act of unfairly or illegally influencing a decision-making process through the giving, or receiving, of a benefit.

Bribery refers to the offering, giving, soliciting, or receiving of any item of value as a means of influencing the actions of an individual holding a public or legal duty.

A public official who requires or accepts a benefit for him/herself or a third person is also liable to prosecution for bribery. Even if no public official is involved, a case of bribery may occur in the course of private business relationships if someone offers to an employee the prospect of an advantage as a return for unduly favouring him or her or another person.

The giving or receiving of a bribe is unlawful, unacceptable and a violation of this Policy. Any employee who gives or receives a bribe shall be investigated and potentially have that conduct reported to the relevant authorities.

## **8. COMPETITION AND ANTI-COMPETITIVE BEHAVIOUR**

Dornan is committed to fair and open competition. Dornan expects its employees to uphold fair competition in all markets and refrain from actions that could unfairly exclude or reduce competition.

Employees must not engage in any misrepresentation, manipulation, concealment or misuse of confidential information. Employees should not engage in disparaging discourse against competitors or engage in unfair practices with shareholders, clients, business partners, competitors, or other employees. Any information obtained about competitors, their products, services, technologies, pricing and marketing campaigns must be done through legal and ethical means.

Employees must not enter into any business arrangements or cartel conduct that could eliminate, discourage competition or confer an inappropriate competitive advantage.

If employees are unsure about whether something could be considered as an unfair practice or as anticompetitive conduct, they should seek advice from the Legal, Compliance and Data Protection Department by email [comlpaince@dornangroup.com](mailto:comlpaince@dornangroup.com). It is crucial that employees abide by these rules to maintain Dornan's reputation and comply with competition laws.



## **9. GIFT GIVING AND ENTERTAINMENT**

Dornan's general Policy is that employees should take nothing of value from any individual or entity doing business with Dornan or seeking to do business with Dornan. Any entertainment of gift received from a third party in these circumstances should be reimbursed or paid for.

Dornan prohibits employees from giving a gift, meal or any item of value to any individual or entity for dishonest or unlawful purposes, or in violation of this Policy. This includes the giving and receiving of gifts through others for an employee's own purposes.

In the context of business, gifts are often offered with the expectation of receiving something of value in return. These exchanges can create conflicts of interest, the appearance of impropriety, and the perception that Dornan is not acting in the best interests of our clients.

## **10. CONFLICT OF INTEREST**

Dornan expects all employees to demonstrate loyalty to Dornan. Employees must avoid situations where their own personal or financial interests conflict with those of Dornan. A conflict of interest exists whenever the nature or scale of a participating interest could in any way influence how employees perform their duties for Dornan. Employees must also avoid the appearance of such conflicts of interest. Conflicts that are merely perceived can be as damaging as actual conflicts. All current or potential conflict of interest must be reported to the Legal, Compliance and Data Protection department.

## **11. MONEY LAUNDERING, PROTECTION OF ASSETS AND INTELLECTUAL PROPERTY**

### **11.1. MONEY LAUNDERING**

Employees agree to comply with all laws that prohibit money laundering, financing for illegal or illegitimate purposes. Employees should endeavour to work exclusively with reputable counterparties involved in legitimate business activities with funds derived from legitimate sources.

### **11.2. INTELLECTUAL PROPERTY AND PROTECTION OF ASSETS**

All intellectual property rights, including but not limited to patents, copyrights, trademarks, trade secrets, and know-how, created or developed shall be the sole and exclusive property of Dornan. Employees shall protect trade and Dornan information. Confidential information and documents must not be disclosed without authorisation. Confidential information related to Dornan and its stakeholders must be kept secure and only shared with authorised individuals. Employees shall comply with all laws protecting intellectual property, trade





secrets and personal data. Employees shall respect Dornan assets, using them only with proper authorisation and preventing misuse, damage or theft.

## **12. CONFIDENTIALITY**

Dornan's business activities must be treated confidentially. Dornan information must not be disclosed to unauthorised persons. This obligation persists beyond the termination of a person's employment. As a general rule, any Dornan information that is not included on Dornan's public website should be treated as confidential.

## **13. EXPENSES**

Dornan expects all employees to act responsibly and professionally when incurring and submitting costs, including accurate and complete expense reports. Dornan employees are only reimbursed for actual, reasonable, and appropriate expenses, and generally, should be made financially "whole" — no gain or loss after reimbursement for reasonable expenses. Ethical and careful judgment must be exercised when deciding on what expenses to incur and submit for reimbursement. When incurring expenses, accurate documentation must be retained, including receipts and invoices. Entertainment for clients and customers should be reasonable and proper, aligning with the Dornan Expenses Policy.

## **14. DATA PROTECTION**

Dornan are committed to upholding the principles of the General Data Protection Regulation (EU GDPR) and UK GDPR ensuring the privacy and security of all personal data we handle. All employees must process personal data lawfully, fairly and transparently and only for specified, legitimate purposes. It is essential to protect data against unauthorised access, loss or disclosure. Employees are expected to follow internal Data Protection Policies, complete the mandatory training on induction annually and report any data breaches immediately. Compliance with GDPR is not only a legal obligation but a reflection of our respect for individual privacy and trust.

## **15. ANTI-SLAVERY AND HUMAN TRAFFICKING**

Dornan are committed to a zero tolerance approach to modern slavery and human trafficking in all its forms. All employees must ensure that their actions and decisions uphold our commitment to ethical labour practices and human rights. We expect everyone in our organisation and supply chain to comply with relevant anti-slavery legislation. Any concerns or suspicions of forced labour, exploitation or human trafficking must be reported immediately by contacting the Legal, Compliance and Data Protection department or emailing





[compliance@dornangroup.com](mailto:compliance@dornangroup.com). Upholding these standards is a shared responsibility and a core part of our ethical culture.

## **16. FAIR WORKING CONDITIONS AND REMUNERATION**

Dornan are committed to providing a safe, respectful and inclusive working environment where all employees are treated fairly and with dignity. We ensure that working hours, rest periods and leave entitlements comply with applicable EU & UK laws as well as industry standards. All employees must receive fair and competitive remuneration for their work, including wages and benefits. Promoting fair working conditions is fundamental to our values and essential to sustaining a motivated and ethical workforce.

## **17. ANTI-HARASSMENT AND DISCRIMINATION**

Dornan requires all employees to prohibit unacceptable treatment of colleagues, including physical punishment, torture, sexual harassment, abuse, mental or physical coercion, verbal abuse, or threats of such treatment. Employees must commit to opposing all forms of discrimination, harassment and mobbing within the scope of prevailing laws. Employees are encouraged to foster an atmosphere of respectful mutual relations and rigorously oppose discrimination based on race, ethnicity, religion, language, gender, sexual identity or orientation, national or social origin, ideology, political opinion, union membership, age, health status, disability, and personal or social circumstances.

## **18. FREEDOM OF ASSOCIATION**

All Dornan employees have the right to freely associate, to form or join a trade union or other lawful worker organisations of their own choosing, in accordance with The Charter of Fundamental Rights of the European Union and The European Convention on Human Rights.

## **19. HEALTH AND SAFETY**

Dornan strives to develop a work environment that promotes health and safety. Complies with any legal requirements related to the workplace and health protection. All employees are required to observe Dornan's Health & Safety policies in addition to all applicable laws and regulations regarding health and safety.

## **20. ENVIRONMENTAL PROTECTION**

Dornan believes in utilising our technical expertise to create a healthy, prosperous and sustainable future for our employees, clients and the environment. Employees are required to comply with all applicable laws, regulations, Dornan policies and client requirements to protect the environment.



## **21. BREACHES OF POLICY**

Any breach of the Policy, including violations related to data protection, anti-slavery, fair working conditions or any other outlined standards, will be taken seriously and may result in disciplinary action, up to and including termination of employment. All employees have a responsibility to report suspected breaches promptly through the appropriate internal channels outlined throughout this Policy. Dornan are committed to investigating all reports thoroughly and fairly, and to taking correction action where necessary. Maintaining the integrity of our workplace and upholding our values is a shared responsibility.

## **22. REVIEW AND AMENDMENTS**

This Policy will be periodically reviewed and updated as necessary to ensure its effectiveness and compliance with relevant legal and regulatory requirements. Please contact [compliance@dornangroup.com](mailto:compliance@dornangroup.com) for any queries in relation to this Policy