



COMPLIANCE POLICY



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DORNAN
A Turner Company

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COMPLIANCE POLICY

1. INTRODUCTION

At Dornan, we are committed to conducting our business with the highest standards of integrity, transparency and accountability. This Compliance Policy (the “Policy”) outlines the principles and procedures that guide our adherence to applicable laws, regulations and internal standards. It serves as a framework and is supplemental to Dornan’s Employee Code of Conduct and Code of Conduct for Business Partners. Collectively these policies ensure that all employees, contractors, sub-contractors, business partners, third-parties, clients and stakeholders understand their responsibilities and act in accordance with legal and ethical expectations.

2. PURPOSE

The purpose of this Policy is to establish a structured approach to ensure that Dornan operates in full accordance with all applicable laws, regulations, industry standards and internal policies. It is designed to promote ethical conduct, prevent misconduct and protect Dornan from legal and reputational risks. This Policy, together with the principles outlined in our Employee Code of Conduct, forms the cornerstone of our compliance culture. It provides clear guidance to employees, contractors, sub-contractors, business partners, third parties, clients, and stakeholders, enabling them to make responsible and informed decisions that reflect our values and meet our legal obligations.

3. SCOPE

This Policy applies to all of Dornan’s employees, contractors, sub-contractors, business partners, 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.

4. COMPLIANCE OBJECTIVES

- Maintain a documented list of all relevant legal, regulatory, and contractual requirements applicable to Dornan.
- Ensure compliance with applicable laws governing operations, including financial, environmental, data protection, and labour laws and any other relevant legislation

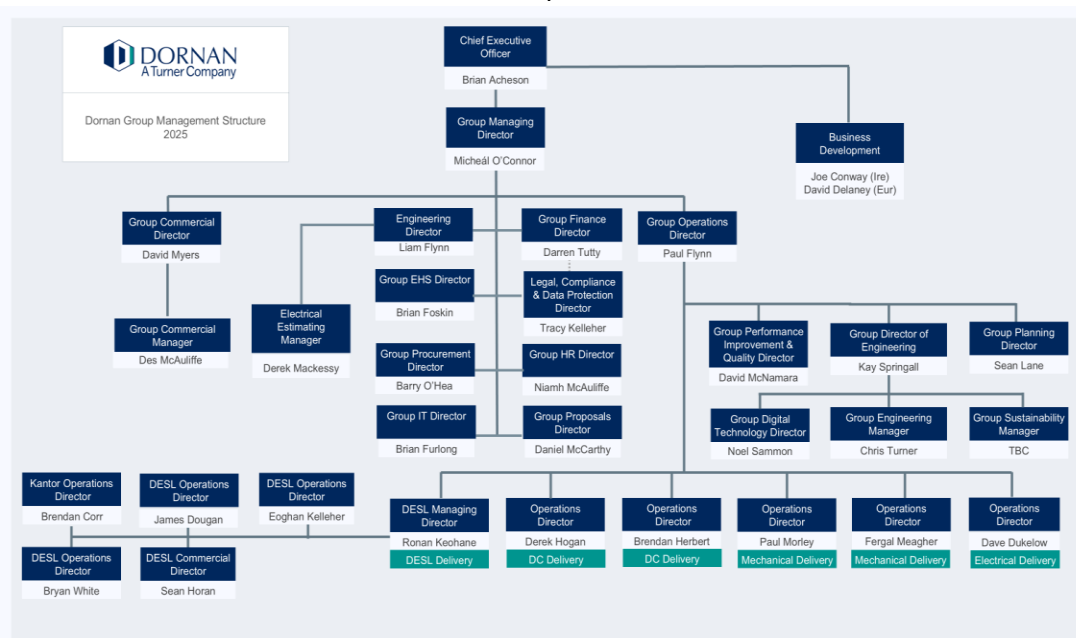


depending on jurisdictions that Dornan is working in/across.

- Identify and mitigate risks related to the processing of sensitive data, including PII/personal data and confidential business information.
- Establish clear guidelines for intellectual property rights protection, including copyrights, trademarks, and patents.
- Implement anti-bribery and anti-corruption measures in compliance with relevant laws and industry standards (e.g., OECD Anti-Bribery Convention, UN Convention Against Corruption, or other applicable regulations depending on the jurisdictions that Dornan works in/across).
- Promote equality, diversity, and inclusion in compliance with employment and human rights regulations (e.g., ILO conventions, UN Guiding Principles on Business and Human Rights, or other applicable laws).
- Establish whistleblower protections to encourage ethical reporting of violations without fear of retaliation.
- Ensure compliance with industry-specific regulatory frameworks where applicable.
- Provide training and awareness, ensuring all employees and stakeholders, are informed about their compliance responsibilities through regular training and communication.

5. THE COMPLIANCE FUNCTION

Outlined below is the structure of the Compliance Function within Dornan:





6. BREACHES OF THIS POLICY

Any breach of this 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 or by emailing compliance@dornangroup.com. Dornan is 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.

7. COMPLAINTS OR CONCERNS

If any member of staff has questions about this Policy or any concerns about this Policy or associated policies, then they should speak to their direct line manager or the Legal, Compliance and Data Protection department. The Legal, Compliance and Data Protection department can be contacted via compliance@dornangroup.com.

All concerns or issues reported will be treated confidentially and without retaliation.

8. DOCUMENT OWNER AND APPROVAL

The Legal, Compliance and Data Protection department is the owner of this table and is responsible for ensuring that this document is reviewed on an annual basis.