



COMPLIANCE POLICY

11/09/2026





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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. COMPLIANCE PRINCIPLES

DORNAN'S COMPLIANCE PROGRAMME IS BUILT UPON THE FOLLOWING PRINCIPLES:

- Compliance with all applicable laws, regulations, contractual obligations, and industry standards.
- Acting with integrity, honesty, and transparency in all business dealings.



Compliance Policy

Dornan Engineering Limited its Subsidiaries and Branches Hereafter for the purpose of this Policy known as **Dornan**

- Maintaining a culture where employees feel empowered to raise concerns without fear of retaliation.
- Identifying, assessing, and managing compliance risks on an ongoing basis.
- Promoting accountability at all levels of the organisation.
- Encouraging ethical decision-making and responsible business conduct.
- Continuous improvement through monitoring, training, awareness, and review.

6. THE COMPLIANCE FUNCTION

The Legal, Compliance and Data Protection department is responsible for but not limited to:

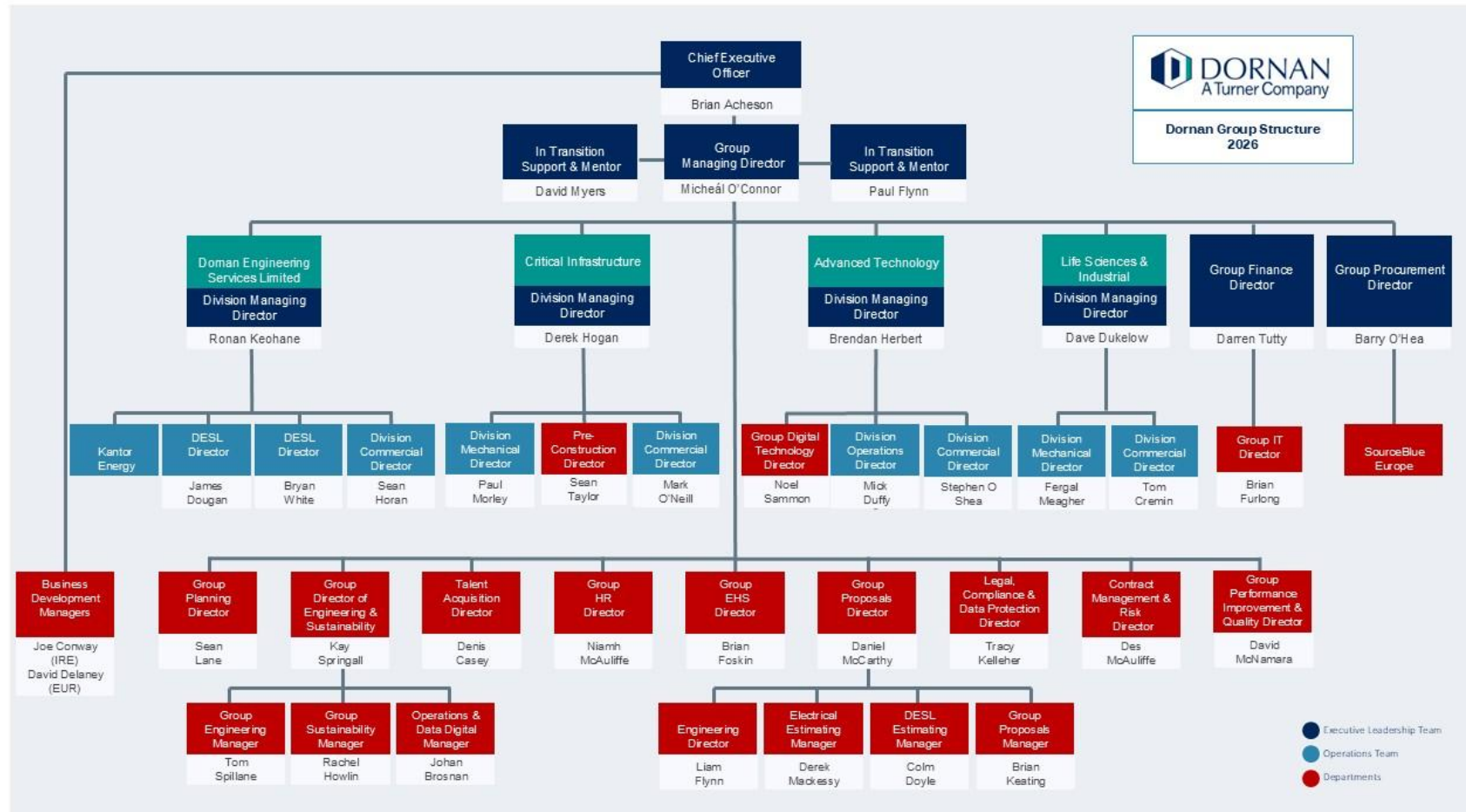
- Developing and maintaining compliance policies, procedures, and standards.
- Monitoring compliance with applicable legal, regulatory, and contractual obligations.
- Providing advice and guidance on compliance-related matters.
- Conducting compliance risk assessments.
- Supporting due diligence activities relating to suppliers, subcontractors and third parties.
- Managing investigations relating to alleged breaches of compliance obligations.
- Coordinating compliance training and awareness initiatives.
- Monitoring regulatory developments and emerging compliance risks.
- Supporting the operation of Speak Up, whistleblowing and reporting mechanisms.
- Reporting significant compliance matters to senior management.
- Conduct risk-based compliance monitoring activities, including audits, spot checks and reviews of suppliers, subcontractors and other third parties, to assess compliance with Dornan policies, legal requirements, and contractual obligations.

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



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7. RAISING CONCERNS AND NON-RETALIATION

Dornan is committed to fostering a culture where concerns can be raised openly and in good faith.

No employee, contractor, subcontractor, supplier, or business partner will suffer retaliation, discrimination, or adverse treatment for reporting a genuine concern, participating in an investigation, or seeking guidance on a compliance matter.

Reports may be made through management, Human Resources, the Legal, Compliance and Data Protection department or other approved reporting channels.

8. 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.

9. 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.

10. 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.