



Anti-Corruption & Bribery Policy

Scope

This policy applies to all DelAgua Group of Companies (“The Company”) and its Directors, employees, Contractors and Officers (“Staff”) globally, and to all those acting on DelAgua Group’s behalf. All third parties doing business with The Company or acting on our behalf must follow this policy and put in place procedures to prevent and detect bribery and corruption.

Aims

The Company has zero tolerance of bribery and corruption. All Staff and others acting on The Company’s behalf must understand and comply with The Company’s zero-tolerance approach to bribery and corruption anywhere we operate.

Guiding Principles

There is no place for bribery and corruption in our business.

Bribery and Corruption

- If you make, authorise, seek or accept any kind of offer, gift, kickback, illicit payment or facilitation payment to get or keep an unfair advantage, that’s bribery. It doesn’t have to involve money.
- If you offer, promise or give something intending to influence someone’s behaviour or actions, this is bribery. It is also bribery if you do it indirectly via any third party such as consultants, contractors, agents, sponsors or joint venture partners, advisors, customers, or suppliers.
- Don’t use The Company funds for any unlawful, improper or unethical purpose.
- Take care when you are dealing with government or public officials as laws are strict and your actions could be misinterpreted. We must never offer, promise or give anything of value with the aim of influencing any government or public official in their work. This includes facilitation payments or “grease payments” such as payments to speed up the performance of routine governmental actions.
- Even if you offer or are offered a bribe which isn’t accepted or if you promise or are promised something which is never delivered, this is unacceptable.

Gifts and Hospitality

- Don’t offer or accept gifts, payment or hospitality to encourage or reward a decision.

Charitable Donations and Sponsorship

- You must not use charitable donations or sponsorship as a way of concealing a bribe.



Keeping Records

- Staff record keeping must be accurate and transparent. If you are responsible for keeping records make sure that they accurately reflect and are a fair presentation of the activities they record and reflect the nature and purpose of the activity. This includes records relating to gifts and hospitality, charitable and political contributions, pre-approval documents and checks of third parties.

Responsibility

- As a member of Staff you are expected to conduct company business following the highest professional and ethical standards and in line with the applicable country laws under which The Company does business.
- We are all individually responsible for reading, knowing and complying with this policy and The Company's Code of Conduct. If you are a Country Manager, then it is your responsibility to make sure that each member of your team has access to the guidance and completes the training they need so that they understand and follow this policy.
- Breaches of this policy can result in The Company taking disciplinary action and could lead to dismissal in serious cases. Bribery is also subject to laws and controls worldwide and there are serious penalties for anyone, or any company, breaking these laws including unlimited fines and imprisonment.

Procedures/Processes Bribery and Corruption

- Don't make payments in cash, bonds, securities or anything similar. Always make payments by wire transfer or cheque to a bank account which is in the name of the person or their representative and which is in the country where they regularly provide services to The Company.
- If you are appointing a third party to work for The Company follow the correct process. Procurement is responsible for appointing suppliers.

Reporting Concerns

- If you are approached and asked to pay a bribe, including facilitation payments, or are offered a bribe, or you think another member of Staff or third party may be offering or offered a bribe or be involved in any corrupt behaviour, then report or discuss this with your Country Manager/ Company Director.
- There may be some instances where you want to raise a sensitive ethical issue with someone who isn't connected to your team. Our legal team Collyer Bristow are available for you to leave a message in person, online or by voicemail.
- We know it takes courage to speak up. We'll do whatever we can to support and protect you and we won't permit anyone to retaliate against you for reporting your concerns. If someone tries to deter you from speaking up that's a disciplinary offence and we'll deal with it seriously.



Guidance - Bribery and Corruption

Take particular care if there are any of these 'red flags' and ask for guidance from your Country Manager/ Company Director:

- Any close family, personal or business ties that a third party or partner has with government officials
- A history of corruption in the country or business sector
- A request for a cash payment
- Requests for commissions substantially above the normal rate
- Unusual payment arrangement such as payments to be made in a third country or to a third party
- Requests for us to pay expenses which are unusual or vague
- Invoices which are too high or non-standard
- Where a third party refuses to agree to take action where a payment is corrupt