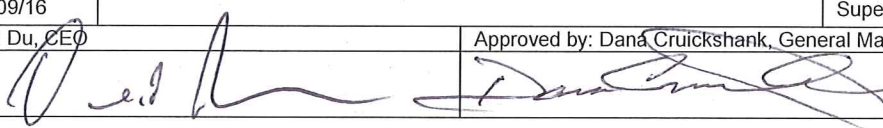


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Doc. #: DP-7.1.4.2	ANTI-BRIBERY AND ANTI-CORRUPTION POLICY	Revision: A
Effective Date: 12/09/16		Supersedes: N/A
Approved by: David Du, CEO	Approved by: Dana Cruickshank, General Manager	
		

1.0 Introduction

- 1.1 Bribery and corruption is, unfortunately, a feature of public and corporate life in many countries around the world.
- 1.2 Dutek, while small and with a limited procurement budget, does have a global reach and therefore needs a clear policy on anti bribery and corruption to support our employees to make decisions in line with our values.
- 1.3 Our corporate conduct is based on our commitment to acting professionally, fairly and with integrity. Dutek does not tolerate any form of bribery and corruption.

2.0 Definitions

- 2.1 *Bribery* is the offering, promising, giving, accepting or soliciting of money, gifts or other advantage as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organisation`s activities.
- 2.2 *Corruption* is the abuse of entrusted power for private gain.

3.0 Purpose and Scope

- 3.1 The purpose of this policy is to set out the responsibilities of Dutek employees in observing and upholding our values with respect to bribery and corruption.
- 3.2 This policy applies to all Dutek employees, suppliers, sales representatives, and contractors.

4.0 Policy

- 4.1 Bribery - Our principle policy is a "Zero-tolerance of bribery" in any form, meaning that Dutek institutionally and its employees will not engage in bribery or any form of unethical payments including facilitation payments.
- 4.2 Conflicts of Interest - All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of Dutek. Dutek employees must always make business decisions in the best interest of Dutek.
 - 4.2.1 They have to avoid any conflicts of interest which would interfere or appear to interfere with their ability to perform their duties.
 - 4.2.2 Potential conflicts may include:
 - 4.2.2.1 Gifts
 - 4.2.2.2 Using Dutek information for personal gain
 - 4.2.2.3 Evaluating friends or relatives that own or work in a company that is being selected as a potential Dutek Supplier
 - 4.2.2.4 Owning part of a supplier business
- 4.3 Whistleblower Policy – Suppliers or employees with information on bribery or corruption taking place within the organization should follow DP-7.1.4.1 Dutek Whistleblower Policy, which also contains a strict anti-retaliation policy.



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5.0 Training and communication

5.1 Dutek will communicate this policy and relevant guidance to our suppliers, contractors and employees. Dutek managers and employees will receive relevant training on how to implement this policy within their job scope.

6.0 Monitoring and review

6.1 Dutek will periodically review the implementation of this policy in respect of its suitability and effectiveness and make improvements as appropriate.

7.0 Revision History

Revision	Revision Date	Paragraph(s)	Description
A	12/09/16	All	Initial Release