

1. Purpose

The Company has a zero-tolerance approach to bribery and corruption.

Bribery can be described as the giving to or receiving by any person of anything of value (usually money, a gift, loan, reward, favour, commission or entertainment) as an improper inducement or reward for obtaining business or any other benefit. Bribery can take place in the public sector (eg bribing a public official) or private sector (eg bribing the employee of a customer).

2. Scope

This Policy applies to all employees and contractors engaged by Dynamic Group Holdings and its associated subsidiaries (the Company).

3. Commitment

The Company is committed to acting professionally, fairly and with integrity in all business dealings. Representatives are not permitted to pay, offer, accept or receive a bribe in any form.

Representatives must never:

- offer, pay or give anything of value to a public official in order to obtain business or anything of benefit to the Company;
- attempt to induce a public official, whether local or foreign, to do something illegal or unethical;
- pay any person when you know, or have reason to suspect, that all or part of the payment may be channelled to a public official. You should therefore be careful when selecting third parties, such as agents, contractors, subcontractors, and consultants;
- offer or receive anything of value as a 'quid pro quo' in relation to obtaining business or awarding contracts;
- otherwise use illegal or improper means (including bribes, favours, blackmail, financial payments, inducements, secret commissions or other rewards) to influence the actions of others; or offering anything of value when you know it would be contrary to the rules of the recipient's organisation for the recipient to accept it;
- make a false or misleading entry in the Company books or financial records;
- act as an intermediary for a third party in the solicitation, acceptance, payment or offer of a bribe or kickback;
- so-called 'facilitation' or 'grease' payments are prohibited;
- do anything to induce, assist or permit someone else to violate these rules; and
- ignore, or fail to report, any suggestion of a bribe.