

Scope and Purpose

DSM's Anti-Bribery procedures apply to all employees, as well as agency workers, consultants, contractors, and sub-contractors both in the UK and overseas.

The aim of this Policy is to establish ground rules that fraud, corruption and bribery will not be tolerated and spell out the consequences of fraud and or bribery. It also sets out the framework to ensure a fast and appropriate response to instances of alleged fraud, corruption, and bribery.

The overall objective is to limit DSM's exposure to fraud, corruption, and bribery and to minimise financial loss and the potential adverse effects on its image and reputation in the event of its occurrence.

Principles

The integrity and reputation of DSM depends on the honesty, openness and fairness brought to their day to day working by everyone associated with DSM.

DSM will not tolerate any form of corruption or bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons or companies acting for it or on its behalf.

The Directors and senior management are committed to implementing and enforcing effective systems throughout DSM to prevent, monitor and eliminate bribery and or corruption, in accordance with its obligations under the Bribery Act 2010.

This Anti-Bribery and Corruption Policy outlines DSM's position on preventing and prohibiting bribery and corruption. In addition, it will be included in on and off-site personnel and sub-contractor inductions and training.

All employees and any other person acting on behalf of DSM are prohibited from offering, giving, soliciting or accepting any bribe, whether cash or other form of inducement to or from any person or DSM in order to gain any commercial, contractual or regulatory advantage for DSM in a way which is unethical or in order to gain any personal advantage, monetary or otherwise, for themselves or anyone connected with them.

DSM will continue to provide bona fide hospitality to clients and incur promotional expenditure. However, all such expenditure must be transparent, proportionate, reasonable and authorised in advance, in accordance with DSM's anti-bribery and corruption policy procedures.

In the course of providing services to clients, or in dealings with suppliers, or any other person having similar connections to DSM, employees should under no circumstances accept money, gifts or other forms of reward with a value exceeding £25 or without prior consent from a Director. All such reported gifts shall be recorded.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to a Director before proceeding.

Breach of the Policy

Any breach of DSM's Anti-Bribery and Corruption procedures will normally be treated as Gross Misconduct. Employees should also note that bribery is a serious criminal offence, which could result in prosecution with a 10-year prison sentence and unlimited fines.

Document history

Document history is contained in separate HR Policies and Procedures Index.



Andrew Fletcher
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Issue Date
Review By Date

June 2025
June 2026