DSEC
RAIL PROJECTS

BRIBERY POLICY

DSEC Ltd (The Company) Policy to comply with all laws, rules, and regulations governing anti bribery and corruption law, in all the countries where we operate. The Company has a zero tolerance approach to acts of bribery and corruption, by employees or anyone acting on our behalf. Any breach of this policy will be regarded as a serious matter by the Company of which is likely to result in disciplinary action.

This means that the Company and its employees will never seek, accept or give a bribe, facilitation payment, kickback or any other improper payment. We must also always ensure that we operate with appropriate transparency in all our business dealings

Who is covered by the policy?
This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us.

What is a bribe?
Bribes can take on many different shapes and forms, but typically they involve corrupt intent. There will usually be a *'quid pro quo'* – both parties will benefit.

- A bribe is a financial or other advantage offered or given:

  To anyone to persuade them to or reward them for performing their duties improperly or;
  To any public official with the intention of influencing the official in the performance of his / her duties.

Gifts and Hospitality
This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with policy in respect of gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

Facilitation payments, kickbacks & donations
We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us. We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

Raising Concerns
Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

The policy will be reviewed annually as part of the Management review process, to ensure its continued relevance and adequacy.

Signed:

Name (Print): D Smalley

Position: Managing Director

Dated : 31st October 2025

Review Date:- By 31st October 2026