



## ANTI-BRIBERY & CORRUPTION POLICY



Our Code of Conduct and our extensive anti-bribery and corruption program are designed to ensure we uphold the highest standards of professional integrity.

### OUR POSITION

DHMS Civil's position is that bribery and corruption are unethical and unacceptable and are inconsistent with our Values and our Code of Conduct.

In support of this position, DHMS Civil's has an extensive anti-bribery and corruption program. This includes detailed policies applicable to all DHMS Civil's sectors and their personnel, as well as training, compliance procedures and an international whistle-blowing hotline.

### DHMS CIVIL'S VALUES AND CODE OF CONDUCT

Outlined in DHMS Civil's Code of Conduct are the responsibilities all DHMS people have to each other, our clients, and the public. It shows how our Values inspire our greatest aspirations and guide all of our behaviours and actions. It defines what it means to work at and be part of DHMS, as well as our individual and collective responsibilities.

Our Values lie at the heart of the way we do things. To do the right thing, the right way. Always. They drive our daily behaviours, guide our decisions, and shape our character. They form the foundation of a resilient culture ready to meet challenge with integrity, so we never lose sight of our principal responsibility to protect the public interest. And they propel us forward – through our work and the example we set – as we inspire confidence and empower change.

Our collective commitments as stated in the Code of Conduct, specific to anti-bribery and corruption, include:

- Act lawfully, ethically and in the public interest;
- Not tolerate behavior within KPMG, by clients or suppliers, or public officials with whom we deal, that is illegal, unethical or breaches human rights;
- Not accept or offer bribes, or participate in corrupt practices, and have a zero tolerance for bribery and corruption in any form by any party; and

- Follow high standards of ethical conduct around the world, including aspiring to the ten principles of the UN Global Compact (including anti-bribery).

These commitments reflect DHMS Civil's position as a compliance driven contractor.

## OUR POLICIES

DHMS Civil's has policies that all DHMS Civil's sector departments are required to adopt concerning:

- Anti-bribery;
- Compliance with laws, regulations and professional standards;
- Requirements to report, and consult in relation to, suspected wrongdoing by KPMG firms or personnel, clients or third parties;
- Facilitation payments;
- Inducements, including gifts and entertainment;
- Political donations;
- Charitable donations and sponsorships;
- Insider trading;
- Arrangements with suppliers and other third parties, and internal accounting controls.

## OUR TRAINING

DHMS Civil's are required to provide anti-bribery and corruption training to their people.

Training on anti-bribery and corruption is included within KPMG International's "We Do What is Right: Integrity at DHMS" course, which also includes modules on areas such as compliance with laws, regulations and professional standards and the Code of Conduct.

The training is required to be completed by client-facing personnel annually, with new hires completing such training within three months of joining a DHMS Civil's sectors. In addition, certain non-client facing personnel who work in finance, procurement, or the sales and marketing departments are also required to participate in anti-bribery training tailored to these groups.

## OUR COMPLIANCE PROGRAMS

DHMS Civil's has monitoring programs that evaluate DHMS Civil's sectors compliance with its key policies and procedures and the relevance, adequacy and effective operation of key quality control policies and procedures. The results and lessons from the programs are communicated within each member firm and the overall findings from these programs are considered at regional levels.

## OUR WHISTLE-BLOWING PROGRAM

To facilitate the reporting of potential or suspected violations of DHMS Civil's policy or applicable laws, regulations or professional standards, including those relating to anti-bribery, KPMG International has a hotline available for DHMS Civil's personnel, clients, and other third parties to confidentially report concerns they have relating to certain areas of activity by any personnel.

In many cases, DHMS Civil's around the UK also have their own hotlines to facilitate reporting of concerns relating to illegal and unethical acts.