



# DBS

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## DBS Group – Employer Code of Conduct

Our Code of Conduct defines how all DBS Group employees work. We are proud of the ethical business practices that we have established and the values we promote, and this success can only be maintained if all our employees embrace the same ethics and principles. All DBS Group employees – regardless of status or category – must adhere to the values and requirements contained in this Code. This includes part-time, temporary and contract employees.

Managers and supervisors have a particular responsibility to lead by example and act according to the principles of our Code. Breaches of the code of conduct or relevant policies will result in disciplinary action.

This document sets to outline our expectations for our employees at all levels of the company. It is not intended to be exhaustive, but rather to give an indication of the areas that may fall within the scope of the Code of Conduct. It is a guide to 'doing the right thing', but does not replace your decision making, which should be done with our values and ethics in mind. If you have any concerns about the application of this Code, you should seek the advice of your manager.

### DBS Group Values

DBS Group is committed to conducting business in a responsible and sustainable way. Our code of conduct is based on our DBS Group values: -

#### *Care for Life*

- We care for the environment and people.
- We support health and wellbeing.
- We work safely, or not at all.
- We never walk by if we notice unsafe actions.
- We are accountable to future generations.
- We promote green solutions and or incorporating green solutions in our working.

#### *Act Ethically and Transparently*

- We do business with honesty and transparency.
- We adhere to our Code of Conduct.
- We promote a working environment where everyone can speak their mind.

#### *Be Better – Together*

- We build open and honest relationships with our customers, suppliers, partners and community.
- We promote an inclusive culture where we are open and fair, showing trust and respect for each other.
- We always strive to be better in all we do.
- We look to deliver the best solutions taking account of the environment, cost and efficiency.



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## *Commit to Customers*

- We take time to understand our customers' requirements to deliver the best solution.
- We strive to turn our customers' visions into reality.
- We aim to deliver our projects on budget and in agreed timescales to ensure efficiency and cost-effectiveness.

## Reporting a Concern

In order to carry out our activities with a high degree of integrity and transparency we require an environment in which all employees and stakeholders feel empowered to report instances of non-compliance with our Code, including suspected illegal or unethical conduct. DBS Group will promptly investigate any concerns or issues you report, and take appropriate action based on the findings of our investigation.

All employees are responsible and accountable for reporting suspected or known misconduct to your manager or your manager's manager. Managers are responsible for ensuring that incidences of suspected or proved misconduct are suitably addressed.

No forms of retaliation against employees reporting suspected misconduct in good faith will be tolerated. "Good faith" means that, to the best of your knowledge and belief, everything you report is true and that you report everything you know. Any employee who engages in retaliation will be subject to disciplinary action. If you believe that you have experienced retaliation, you should report it as suspected misconduct.

## Health, Safety and Wellbeing

DBS Group aim for an Injury-Free Environment, working towards preventing accidents in a healthy and safe environment.

Our employees have the right to a secure and safe workplace, and all employees must take responsibility to help ensure a healthy and safe work environment.

All workplace incidents must be reported promptly, as must any unsafe or unhealthy working conditions to a site manager or company manager.

Do not walk by any work activity you believe to be unsafe or unhealthy, you have the authority and responsibility to stop any activity that you believe is being conducted in an unhealthy or unsafe way.

## Fair Working Conditions

We reinforce fair working conditions and human rights for our employees, the people working on our sites, workplaces and throughout our supply chain. All employees are responsible for raising concerns to management if you become aware of any unfair working conditions at DBS Group or by any of our subcontractors or suppliers.

DBS Group respect all individuals and we provide equal treatment and employment opportunities, and we do not tolerate any form of harassment or discrimination. All employees must not tolerate bullying, discrimination, harassment or unwanted sexual advances or other disrespectful behaviour. You must report all such incidences to management if you see or suspect them.



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All employees are expected to embrace and contribute to an inclusive, positive culture where everyone feels valued. You must not discriminate, and you provide fair and equal treatment and opportunities for all employees and job applicants. Employees must not introduce materials or engage in activities that are inappropriate, illegal, sexually explicit or otherwise offensive, whether in the workplace or while representing DBS Group.

## Confidentiality and Protection of Personal Data

We protect confidential information relating to DBS Group and our customers or suppliers and take all reasonable measures to secure it and prevent unauthorised disclosure. Confidential information can also include personal data (including names, addresses, photographs and identification details). Our privacy policy covers how we use and protect personal data.

Employees must always keep confidential information or personal data secure and protect it from loss or theft. This includes laptops, tablets and mobile phones. All breaches or loss of data must be reported immediately to the management.

You must only access personal data if you are authorised to do so and only to the extent necessary to carry out your job. Never grant access to others unless they have the appropriate authorisation and according to legal requirements.

If you receive confidential information in error (whether external or internal) you must contact the sender and advise your manager. You must not act upon the information you have received in error.

## Protection of assets, property and equipment

We safeguard and protect DBS Group's assets from damage, theft, loss and misuse, as they are essential to our business. Our assets comprise of tangible assets - equipment, money, products, machines and vehicles, computers and property, and intangible assets – our brand and trademarks, know-how, trade secrets and copyrights.

Employees must protect company assets and not use them inappropriately or share them without authorisation. Company assets must not be used for personal gain, such as a side business.

## Relationships with Stakeholders

DBS Group's business reputation is crucial for our success. We are committed to constructive, mutually beneficial, long-term business relationships with our customers and suppliers, and promote ethical and transparent modes of business.

Stakeholders include employees, customers, shareholders, external parties with whom we have contracts, and the communities in which we work.

All employees are expected to act with honesty and fairness in all their dealings with our stakeholders and always treat them in a professional and respectful manner. Where relevant you work with external parties to ensure that they understand our ethical standards before entering into any relationships with them.



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## Conflicts of interest

Conflicts of interest occur when there is a contradiction between the interests of the company and our personal interests. DBS Group aims to operate in a manner in which conflicts of interests are actively avoided, and we require our employees to do the same.

Employees must not take part in activities that create either a real or perceived conflict between DBS Group's interests and your personal interests. Employees should avoid situations that may lead to a real or perceived conflict of interest. If a conflict of interest does arise, it must be reported to the management immediately.

## Environment

We are committed to protecting the environment and believe that we can contribute to a more sustainable world. We are constantly seeking ways to improve the environmental performance of our operations, projects and services during their entire life cycles.

All employees are expected to work to understand the environmental impact of their work and projects, and to actively look for opportunities to reduce the environmental risk. This includes trying to reduce energy, water and materials consumption and limit the production of waste, carbon dioxide and pollutants.

Chemicals and hazardous materials must be used, stored, labelled, transported and disposed of according to the correct requirements and procedures.

## Anti-corruption and anti-bribery including hospitality and gifts

We are committed to conducting business with a high level of integrity and we do not tolerate any form of bribery or corruption. Bribery and corruption can include (but is not limited to) kickbacks, extortion, fraud, embezzlement and money laundering, nepotism (family) or cronyism (friends).

We do not request, accept, offer, authorise or provide hospitality or gifts that may improperly influence – or create the appearance of improperly influencing – our business decisions, or decisions by our customers or others with whom we work. We have established a hospitality and gifts policy that outlines acceptable circumstances and monetary limits for hospitality and gifts.

Employees should use their best judgement when deciding to offer or receive hospitality or gifts. Such gifts or hospitality must not be accepted or offered if they may influence a business decision. Gifts of cash or cash equivalents must never be accepted.

Employees must never ask for any form of hospitality or gifts from a customer, supplier or another external party.

Employees must never request, accept, pay or offer bribes of any kind. Ensure that if any intermediaries are engaged they are only for legitimate business reasons. Any fees paid to intermediaries must be in relation to services actually performed and of a reasonable amount.



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## Money Laundering

Money laundering is the process of concealing the origins of money obtained illegally by passing it through a series of banking transfers or commercial transactions. It is understood that our customers or suppliers could use transactions with DBS as a method to disguise the origin or destination of money or assets.

DBS employees are expected to apply due diligence to understand customers and their business. Steps should be made to identify the origin and destination of payments made, in order to identify any possible money laundering and to notify the relevant authorities of any reasonable suspicion of such actions.

Employees should be especially aware of payments made by or to someone who is not a party to the contract, or to or from accounts that are not specified in the contracts. Also requests to split payments into smaller batches, requests for cash payments or the making of overpayments should also be looked into closely to verify the legality of such transactions.