

Anti-Bribery & Corruption

Group Policy Statement



**DANX
Carousel**

About the DANX Carousel Group

The DANX Carousel Group of companies (hereafter “The Group”, “We”, “Our”) is a time critical service logistics specialist with strong positions in the UK, Ireland, BeNeLux, DACH, Iberia, Nordics, Baltics and Poland.

The Group is the comprehensive partner for logistics and supply chain services such as time-critical spare parts distribution, warehousing, final mile, linehaul, battery logistics, customs clearance, and more. The Group consists of DANX, DANX ILS, UT, TBS, Fomab, TLS Group, Carousel, Alltrans, Logik International Logistics and LPR.

Our values encompass our commitment to Caring, Learning and Ownership and these are embedded in our everyday work.

We support



10 principles of the UN GLOBAL COMPACT

HUMAN RIGHTS

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

LABOUR

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour, and

Principle 6: the elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

International Labour Organisation

ILO Declaration of Fundamental Principles and Rights at Work:

- (1) Freedom of association and the effective recognition of the right to collective bargaining;
- (2) The elimination of all forms of forced or compulsory labour;
- (3) The effective abolition of child labour; and
- (4) The elimination of discrimination in respect of employment and occupation.

SUSTAINABLE DEVELOPMENT GOALS



Goal 5 - Gender equality



Goal 8 - Decent Work and Economic Growth



Goal 13 - Climate Action

1. Scope of Policy

The scope of the **Anti-Bribery & Corruption policy** applies to all stakeholder groups including both upstream and downstream within the value chain, including management; employees; contract workers; suppliers and partners of all entities in the Group as well as for subsidiary companies owned and operated by the Danx Carousel Group across our geographies and countries and the wider communities in which it operates.

The scope of this policy is:

- to communicate – internally and externally; outlining its commitment to respect **Anti-Bribery & Corruption**, in-line with the objectives in the regulatory governance and UN Guiding Principles on business conduct and in which material impacts, risks or opportunities relate to across the value chain.
- to provide process awareness, guidance and training to all relevant employees on appropriate behaviour in line with this policy and additionally to communicate that regard to our requirements and expectations to our suppliers and partners and an unbiased dialogue with all our stakeholders on **Anti-Bribery & Corruption**.
- that we expect our suppliers and contractors to share our regard and respect of this policy, and this is reflected in our Supplier Code of Conduct which can be found on our websites: <https://www.danxcarousel.com>, Nordics: <https://www.danx.com/> and for Western Europe: <https://www.carousel.eu/en/>

2. Our Commitment

The DANX Carousel Group is committed to meeting its responsibility and to gain insights into its stakeholders with an open and unbiased dialogue with respect to **Anti-Bribery & Corruption** as defined by, and adopted from the tenth UN Guiding Principle, alongside the relevant legislation for the countries in which we operate in.

3. Aims of the Anti-Bribery & Corruption policy

The aims of this policy is to:

- **prevent and detect** any forms of bribery and corruption of any kind within its business and across its stakeholders and to work against corruption in all its forms, including extortion.
- provide **awareness, guidance and training** to all relevant internal and external stakeholders on appropriate behaviour when it comes to this policy.
- provide a **breach response mechanism** to provide an open and unbiased dialogue with all stakeholders on Anti-Bribery and corruption.
- ensure compliance with all relevant Anti-Bribery and anti-corruption laws and regulations.

Integrity and transparency are of fundamental importance to our business, and we uphold a zero-tolerance attitude towards any form of bribery, corruption, fraud or extortion activities of any kind, whether committed by employees or by third parties acting for or on behalf of the Group.

This policy outlines the DanxCarousel Groups position on reporting and transparency in-line with national and international law, UN guidelines, governance, and regulatory requirements. The content of which outlines; how to report, Infringements and consequences of such breaches; our commitment to training, and awareness of its content and the Groups transparency of reporting and monitoring of this policy.

4. Definitions

Bribery is defined as the giving or offering of a bribe, either directly or indirectly, to any employee or person working on our behalf, and who dishonestly offers, gives, requests or accepts any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person, Government body or Company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

The act of Corruption is defined as; dishonest or fraudulent actions by those in power, typically involving bribery. Bribery and Corruption is a criminal offence.

5. Legislative Policy

In the UK this is found in the Bribery Act of 2010 and the full policy document defined under UK law¹ can be found [here](#)

Within the European Union the directive (EU) 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud to the Union's financial interests by means of criminal law² can be found [here](#)

Nb. Other countries not located in the UK and/or European Union also have regard to relevant legislation and guiding principles.

6. Guiding principles and the Law

The Group has adopted the UN Global Compact's tenth principle to work against corruption in all its forms, including extortion and bribery.

Whilst we appreciate that there may be some differences in applicable national laws versus international laws, we apply our policies across all relevant stakeholders and we will adhere to the national and international laws as a minimum and respect the guiding principles of the UN Global compact, ILO and any other interested regulatory bodies that are applicable and to transparency for the work that we carry out.

As the law changes, this policy is subject to review as a minimum on an annual basis and the Company reserves the right to amend this policy without prior notice.

Where a breach or infringement of this policy is determined under civil or criminal law (national or International), we reserve the right to refer the matter to the relevant authorities for further action.

7. Main offences

Example of main offences are described below; the list is not exhaustive.

- An offence of bribing another person (offering, promising or giving a financial or other advantage to a person to induce or reward a person to perform a relevant function or activity improperly).
- An offence of being bribed (accepting, receiving, or requesting a financial or other advantage as a reward for performing a relevant function or action improperly).
- An offence of bribery of Government bodies or foreign public officials (using a bribe to influence a public official to obtain or retain business or a business advantage).
- A corporate offence of failing to prevent corruption or bribery.

¹ <https://www.legislation.gov.uk/ukpga/2010/23/contents>

² <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32017L1371&qid=1655905063497>

8. Gifts and Hospitality

We realise that the giving and receiving of gifts and hospitality as a reflection of friendship or appreciation where nothing is expected in return may occur, or even be commonplace, in our industry. This does not constitute corruption/bribery where it is proportionate and recorded properly.

No gift should be given, nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from line management. Similarly, no gift or offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from your Line Manager.

9. Monitoring Breaches

The Group is committed to identifying potential and actual adverse impacts that this policy and our conduct of business may cause or contribute to, and strives to recognise and record through targets, prevent, such impacts, and mitigate or remedy using action plans.

10. Consequences of Breach and Infringements

Whilst we appreciate that there may be some differences in applicable national laws versus international laws, we apply our policies across all relevant stakeholders and we will adhere to the national and international laws as a minimum and respect the guiding principles of the UN Global compact, and any other interested regulatory bodies that are applicable to the work that we carry out.

If we receive any reported infringements, we will act appropriately for clarification and will take appropriate corrective actions. If we suspect that anyone working for or on behalf of the DANX Carousel Group has committed a breach of this policy, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken which may result in dismissal, or in the case of a supplier/partner action up to and including termination of contract. In some circumstances, under relevant law, the Group may be legally required to share details with such authorities, and we will always comply with such requirements.

The outlined topics within this policy are significant for the way we commit to and govern our conduct throughout our business.

11. Raising concerns

Any employee with concerns may raise these through our employee mechanisms for raising workplace-related grievances. We encourage employees who have a concern to talk in the first instance to their line manager, or alternatively to raise their concern with their HR or compliance representatives. If neither of these options is possible, the DANX Carousel Group's whistle blower system enables all stakeholders (internal and external) to speak up about violations in relation to this policy without fear of retaliation.

We will support all who report violations as well as those who request assistance or have concerns. If any concerns or illegal or unethical business behaviour is suspected or detected, you can report it to us via our whistle-blower system. Our whistle blower system Safe2Whistle can be accessed here: <https://report.whistleb.com/en/danxcarouselgroup>. It is operated across the business by an independent third party (Bech.Brunn) appointed by the DANX Carousel Group. All issues raised through the Whistle Blower system are monitored by the third party and the Group whistle blower team. Reporting is carried out confidentially, and stakeholders can choose to share their concerns anonymously. Full details of our Whistleblowing policy is available on our websites and intranet.

12. Training, Communication, Awareness

The Group is committed to raise awareness and knowledge of this policy amongst its' stakeholders, by providing specific awareness through training and communication on related matters within this policy.

Training, communication, and awareness of policy is a fundamental requirement of our business. We advocate transparency of all policies and where appropriate training takes place either at point of Induction of employees, or as part of an annual commitment to ensure that policy is communicated and awareness refreshed effectively. All stakeholder policies are available on our intranet and websites.

13. Stakeholder Engagement

We acknowledge our business is operated as part of an extended community of stakeholders, and as part of our regular dialogue with them we respect their view and expectations regarding this policy as outlined in the Employee and Supplier Codes of Conduct.

14. Reporting, Monitoring and Accountability

We have mechanisms in place for reporting Anti-Bribery and Corruption concerns and ensure accountability through regular monitoring.

We communicate and report on our **Anti-Bribery and Corruption** incidents and related commitments of training and awareness as part of our annual reporting.

15. Culture of continuous improvement

As part of our culture of continuous improvement we regularly evaluate against targets and review how we can best improve and strengthen our approach to addressing our policies supported through our values of Caring, Learning and Ownership. We are committed to continuously improving our policies and regularly review and update this policy to reflect evolving standards and stakeholder expectations.

16. Governance and Accountability

Governance and the accountability for the implementation of this policy is overseen by the Groups Executive and Senior Leadership team, to ensure that our business clearly understands the responsibility to respect this policy and its day-to-day implementation to stakeholders.

17. Adoption of Policy

The Danx Carousel Group's **Anti-Bribery & Corruption** Policy statement was adopted by the Executive Leadership team management on **1st January 2025**. This policy is reviewed annually for compliance content or as required if changes to legislation apply sooner.

Review and revision of Policy

This policy will be reviewed and revised annually for compliance to the policy content or as required if changes to legislation apply sooner.

Contact

If you have any questions relating to the content of this policy please direct them to groupcompliance@danxcarousel.com