



Corruption & Anti-Bribery Policy

MAY 1, 2023



DANX Carousel Group Corruption & Anti-Bribery Policy

The DANX Carousel and its subsidiaries and associated companies (collectively the “Group”) is a time critical service logistics specialist with strong positions in the UK, Ireland, Netherlands, Germany, Iberia, Nordics, Baltics and Poland. The Group is required to comply with international Corruption and Anti-Bribery control rules applicable to our business.

The Group of companies is the partner for all types of warehousing, time-critical, final mile and spare parts distribution solutions and with our established, warehouses and distribution networks, our mission is to create solutions for our customers through innovative and efficient logistics solutions.

Built upon tailored distribution flows and great commitment and dedication, The Group delivers exceptional aftermarket, in-night logistics solutions to a wide range of international and local organizations with a guaranteed 99% on-time final mile delivery throughout our regions, often less than 12 hours from collection from the European distribution hubs to the delivery point.

Scope of Policy

It is prohibited, directly or indirectly, for any employee or person working on our behalf to offer, give, request or accept 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.

Bribery is a criminal offence. The Group prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and corruption and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by employees or by third parties acting for or on behalf of the Group.

Exceptional as standard

1. Legislative Policy in the UK & European Union

In the UK this 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](#)

2. Main offences

- 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

3. Suspicion

If we suspect that you, or anyone working for the DANX Carousel Group has committed an act of corruption, bribery or attempted bribery, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken against you which may result in your dismissal, or the cessation of our business arrangement with you.

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>

4. Reporting

If you, as an employee or person working on our behalf, suspect that an act of corruption, bribery or attempted offence has taken place, even if you are not personally involved, you are expected to report this to your Line Manager. You may be asked to give a written account of events.

Employees are reminded of the Company's Whistleblowing Policy, reports are filed electronically through the Whistle-blower system via a web portal, Safe2Whistle, which may be accessed via the internet, <https://report.whistleb.com/en/danxcarouselgroup>.

A copy of the Whistleblowing Policy is available to all DANX Carousel Group employees and 3rd Party contractors.

5. 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 your Line Manager.

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.

6. Record Keeping

A record will be made by your Line Manager of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and the Company reserves the right to amend this policy without prior notice.



Chief Finance Officer

Nigel.ward@danxcarousel.com

DANX.com | carousel.eu