



# Dempsey Corporation

## Anti-Bribery and Anti-Corruption Policy

**Effective Date:** December 3, 2024

**Prepared by:** VP – ESG

**Version:** Public Web Version

---

### Policy Purpose

Dempsey Corporation is committed to ethical conduct and compliance with all applicable anti-bribery and anti-corruption laws, including the Canadian Corruption of Foreign Public Officials Act (CFPOA) and the U.S. Foreign Corrupt Practices Act (FCPA).

This policy outlines our zero-tolerance approach to bribery and corruption and affirms our expectations for employees, suppliers, and business partners.

---

### Scope

This policy applies to:

- All employees, and board members of Dempsey Corporation
- All suppliers, contractors, agents, and third parties acting on our behalf
- All business units and geographic locations

---

### Policy Statements

Dempsey strictly prohibits:

- Offering, promising, giving, accepting, or soliciting bribes or kickbacks
  - Providing undue advantages to government officials or business partners
  - Using third parties to indirectly offer bribes
  - Any facilitation payments, even where customary in local jurisdictions
  - Retaliation against whistleblowers or those who report compliance concerns
-



# Dempsey Corporation

## Anti-Bribery and Anti-Corruption Policy

### Training and Awareness

#### In-House Training

All Dempsey employees must complete mandatory Anti-Bribery and Corruption training. This includes:

- Legal frameworks (CFPOA, FCPA, ISO 37001)
- Real-world case examples
- Supplier and partner interaction scenarios
- Conflict of interest disclosures
- Reporting protocols for suspicious activity

A knowledge test is mandatory to reinforce understanding of key concepts.

#### Onboarding and Annual Re-Certification

Training is required:

- Upon employee onboarding
- Annually through a designated training module

Training completion is logged internally.

#### ESG Committee Certification

All ESG Committee members complete the EcoVadis Anti-Corruption course as part of their role responsibilities.

---

### Roles and Responsibilities

| Role          | Responsibility                                             |
|---------------|------------------------------------------------------------|
| VP – ESG      | Oversees training content and coordination                 |
| HR Department | Maintains policy versioning and training records           |
| Procurement   | Ensures supplier contracts include anti-bribery clauses    |
| All Staff     | Must complete training and report any suspected violations |

---

### Reporting and Whistleblower Protection

Reports of potential bribery or corruption may be submitted through:

- A direct manager or HR contact
- The confidential reporting channel: [redflag@dempseycorporation.com](mailto:redflag@dempseycorporation.com)



# Dempsey Corporation

## Anti-Bribery and Anti-Corruption Policy

Dempsey's Whistleblower Policy ensures non-retaliation and protects all individuals who report in good faith. All reports are reviewed promptly and investigated with discretion.

---

### Supplier Requirements

All Dempsey suppliers must:

- Acknowledge this policy or provide an equivalent anti-bribery statement
  - Accept anti-bribery contractual clauses
  - Cooperate with any Dempsey-led ESG or ethics audit
- 

### Documentation and Recordkeeping

Training logs, policy acknowledgments, and audit findings are securely stored in internal systems and maintained in accordance with our ESG and audit protocols.

---

### Monitoring, Review & Audit

This policy is reviewed annually by the VP - ESG and VP- HR. Improvements are based on:

- Audit outcomes
- Training performance metrics
- Regulatory changes

Archived versions are maintained for compliance and traceability.

---

### Penalties for Breach

Violations of this policy may result in:

- Disciplinary action, including termination of employment
  - Termination of supplier contracts
  - Legal action or referral to law enforcement authorities
- 

If you have any questions about this policy or wish to report a concern, please contact [sustainability@dempseycorporation.com](mailto:sustainability@dempseycorporation.com) or your designated company representative.