



DWT- 42

Company Rules, Policies & Procedures

Legislation may change before, during or after these Rules, Policies & Procedures have been issued or revised. In all cases legislative wording takes precedence.

DWT- 42 Company Ethics & Anti-Bribery Policy 2026

The way in which people representing David Watson Transport Ltd handle their business dealings is critical to maintaining our reputation. To ensure that everyone understands and maintains our values, we have set them out based upon four principals of: Upholding the Law, Integrity, Fairness and Respect.

It is essential that everyone representing David Watson Transport Ltd conforms to the David Watson Transport Ltd Standard as set out in the following statements.

Upholding the Law

It is the responsibility of every David Watson Transport Ltd representative to uphold the Law by complying with it and not condoning those that fail to do so.

It is David Watson Transport Ltd policy that all its activities should be operated within relevant international, national and regional laws and regulations. All David Watson Transport Ltd representatives are responsible for ensuring that this policy is adhered to.

It is David Watson Transport Ltd policy that the carrying out of unlawful acts will not be condoned and any such acts will be reported to the relevant authorities. Any David Watson Transport Ltd representative who becomes aware of illegal or unlawful acts has a duty to report it.

Our Policy on Corruption

- Corruption causes loss and damage, inhibits business growth, is harmful to the reputation of the business, and may result in criminal and civil liability and penalties for the Company and individuals.
- The Company prohibits its directors, managers, officers and employees, from engaging in any form of corruption in relation to its business and affairs.
- Anti-corruption action by individual organisations is unlikely on its own to reduce corruption to any significant extent. There must, in addition, be concerted and collaborative action by all stakeholders and the Company will support all national initiatives and will work with others to reduce corruption.

Integrity

David Watson Transport Ltd is committed to honesty, openness and discretion. This is about more than just telling the truth; it's about acting for the right reasons, it's about being able to justify actions, it's about respect and respecting confidential information. David Watson Transport Ltd representatives must be open, honest and discrete in all of our business practices. They must never knowingly make statements that are untrue, or make promises or commitments on behalf of David Watson Transport Ltd that cannot be upheld.

It is David Watson Transport Ltd policy to avoid conflicts of interest wherever possible. Where they cannot be avoided, for whatever reason, it is our policy to disclose them fully and openly. David Watson Transport Ltd representatives should avoid situations where their personal interests could conflict with the interests of the business and in particular should not accept or offer gifts or entertainment for the purpose on enticement to influence a marketing position. Please refer to **DWT-01** of The Company Handbook, General Company Rules for further information.

It is David Watson Transport Ltd policy to respect confidential information and not to disclose it to any person who is not a David Watson Transport Ltd representative unless required to do so by Law.

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David Watson Transport Ltd will not tolerate bribery of any form. We will not seek to compromise ourselves or others through inducements or entertainment. Any use of gifts or entertainment to enhance business relationships will only be granted at the express permission of the Managing Director.

Our Policy on Bribery

We will take appropriate steps to ensure that:

1. We do not, directly or indirectly, offer, promise, give, accept or demand a bribe or other undue advantage (including excessive gifts and hospitality) in order to obtain or retain business, or gain any other improper advantage.
2. We do not offer, nor give in to demands, to make illicit or illegal payments to agents, public officials (at whatever level), or the employees of business partners or anybody else that we do business with.
3. We engage and remunerate agents and other third parties only for legitimate services and adopt appropriate transparency in our approach.
4. We promote employee awareness of, and compliance with, company policies against bribery and corruption through appropriate dissemination of our own procedures (including disciplinary procedures) policies and training programmes on induction and throughout employment.
5. We adopt management control systems that discourage bribery and corruption, and adopt financial and tax accounting and auditing practices that prevent the establishment of “off the books” secret accounts or the creation of documents which do not properly and fairly record the transactions to which they relate.
6. We do not make illegal or inappropriate contributions to candidates for public office or to political parties or to other political organisations.
7. We raise awareness of the need to combat bribery and corruption with our business partners by publication of this Policy and (where appropriate) relevant contractual provisions and support initiatives designed to reduce the risk of bribery and corruption.

Fairness

David Watson Transport Ltd is committed to fairness in all of our dealings. Fairness requires differing approaches according to specific circumstances, but each situation requires our representatives to be open with each other and with third parties.

David Watson Transport representatives should not withhold information for the sake of convenience and should not be economical with the truth.

Respect

David Watson Transport Ltd is committed to paying due respect to the people we work with, to the environment; to the communities we work within and to the general public.

It is our policy to provide a safe and satisfying workplace that is free from discrimination, harassment and bullying, and we have specific policies on these matters within our Company Handbook, which our employees and representatives have all been provided with a copy of and have signed their acceptance of.

David Watson Transport Ltd encourages our employees to have an understanding of the implications of theirs and our activities on the environment, upon the communities within which we work, the people we work with and encourages everyone to be a good citizen.

Working Partnerships

David Watson Transport Ltd has set out the foregoing policies as a minimum standard of the ethical behaviour we expect of our representatives and employees and as such it is a standard we expect of all of the businesses we are associated with. If any of our working partners are unable to comply with these minimum standards we request that they advise us at their earliest convenience. Where appropriate and achievable we will work with our partners to formulate an acceptable standard.



MANAGING DIRECTOR

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