

## Anti-Corruption and Anti-Bribery Policy

*(Reviewed February 2024. SOP from Diamond ISO manual.)*

### Anti-Corruption and Anti-Bribery

Diamond Packaging is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure corruption and bribery is prevented. Diamond has zero-tolerance for bribery and corrupt activities. We are committed to act professionally, fairly, and with integrity in all business dealings and relationships.

This policy applies to all employees, temporary employees, consultants, contractors and any other third parties, which include customers and vendors. Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value to induce or influence an action or decision. A bribe refers to any inducement, reward, or item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe, and they accept it, they are also breaking the law. Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively, or through a third party. If they are uncertain about whether something is a bribe or a simple act of hospitality, they must ask a Diamond manager.

Diamond Packaging may accept normal and appropriate gestures of hospitality and goodwill so long as the giving or receiving of gifts meet the following requirements:

1. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of business or a business advantage, or as an explicit or implicit exchange for favors or benefits.
2. It is not made with the suggestion that a return favor is expected.
3. It is in compliance with the law.
4. It is given in the name of the company, not in an individual's name.
5. It does not include cash or a cash equivalent.
6. It is appropriate for the circumstances (giving small gifts around the holidays or as a small thank you to a company that has helped out with a large project).
7. It is given/received openly, not secretly.
8. It is not above a value of \$50, unless consent is given by Management.
9. It is not given to/accepted from a government official or politician without the consent of Management.

As good practice, gifts given or received should always be disclosed to Diamond Management.

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Diamond Packaging, you should raise your concerns as early as possible to Human Resources.

