

DORC: Due Diligence policy

October 1st 2017

1. Purpose

Our Global Code of Conduct states that we expect all third parties with whom we work to comply with the law and to adhere to ethical business practices. We will conduct risk-commensurate due diligence on all third parties with whom we interact to ensure that they all comply with the high standards of integrity and business ethics that we demand.

This Policy sets out the principles and rules for conducting due diligence, and describes how they must be implemented.

2. Scope and Applicability

This Policy applies to all DORC employees, distributors, independent contractors, or any other third parties conducting business for or on behalf of DORC.

3. Basic Rules and Principles

DORC will only conduct business with reliable and reputable business partners of good standing and who themselves maintain the highest standards of business integrity.

DORC requires the following mandatory due diligence checks to be undertaken prior to engaging in any business relationship.

3.1 New market entry due diligence check

Entry into a new or unfamiliar market can expose DORC to hidden and unanticipated risks which could undermine a successful market entry and damage DORC's global reputation. The Compliance Department should therefore engage a reputable third party to conduct an exhaustive new market entry due diligence check to ensure that all relevant commercial and reputational risks are identified. The Compliance Department should be consulted in all such cases to ensure that DORC has adequate transparency on factors such as the competitive landscape, the relative strength of industry competitors, the identity and strengths of potential partners, and an assessment of the political, societal, economic, regulatory and operational risks. The CEO, CFO and the Compliance Department should give formal approval to proceed on the basis of this risk assessment.

3.2 Level One Due Diligence (basic checks)

All prospective third parties with whom DORC proposes to enter into a contractual relationship should undergo a Level One Due Diligence (basic check) before any contract is signed. This check should be performed through the services of a reputable third party due diligence provider. All such checks should be logged and retained by the responsible department.

3.3 Level Two Due Diligence ("deep dive" checks)

Based on risk assessment it may be appropriate to conduct a Level Two Due Diligence ("deep dive" check), particularly when a prospective partner operates in or has close commercial links to countries with a higher risk of bribery and corruption, according to reputable and established international indexes such as Transparency International. In such cases the services of a reputable and established third party due diligence provider should be engaged to conduct the Level Two Due Diligence. All reports from such providers should be logged and retained by the Compliance Department.

4. Continuing Monitoring during Agreement

Once DORC has retained a business partner, it should monitor the business partner's activities and undertakings related to DORC's business.

- Question unusual or excessive expenses made by the business partner connected with a DORC business;
- If deemed necessary for a prolongation of a collaboration, request and perform an audit with the business partner;
- If necessary, request a specific assurance declaration on compliance from the business partner.

- Whenever you terminate an agreement as a result of an unethical behaviour of your business partner, such a termination must be reported to the Compliance Department

5. Risk-based Compliance Evidencing

DORC should make all reasonable efforts to evidence due diligence, monitoring and compliance engagement by third parties.

5.1 Documentation

The Compliance Department should retain an adequate, risk-based and updated documentation relating to the due diligence, monitoring and compliance engagement process that has been applied to DORC's business partners.

5.2 Audit

DORC may conduct an audit of third parties based on the appropriate contractual agreement. The scope of an audit to be performed has to be determined with the third party concerned by taking into account the specific business risks and compliance concerns.

6. Implementation

6.1 Training and Awareness

Employees must familiarize themselves with this Policy and participate in periodically held training sessions, including e-learning. Managers should additionally be trained on their specific responsibility to evaluate and effectively address potential bribery and corruption issues. Attendee lists should be signed, retained and archived for every mandatory training event.

6.2 Reporting Potential Misconduct/Non-Retaliation

Any employee who learns of a potential violation of applicable laws or this Policy is required to report his or her suspicion promptly in accordance with the DORC Speak-Up Policy.

Employees who report potential misconduct or who provide information or otherwise assist in any inquiry or investigation of potential misconduct will be protected against retaliation. However, an employee who makes a report of potential policy violations is not automatically immune from disciplinary procedures, if he/she is involved in misconduct.

6.3 Breach of this Policy

Breaches of this Policy will not be tolerated and can lead to disciplinary and other actions up to and including termination of employment.

6.4 Responsibilities and Implementation

It is the responsibility of every DORC Manager to adhere to this Policy within his or her area of functional responsibility, to lead by example, and to provide guidance to those employees reporting to him or her.

All employees are responsible for adhering to the principles and rules set out in this Policy.