



**DSI**  
UNDERGROUND



***Global Business  
Partner Policy***

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# CEO Message

## Our Commitment

*DSI Underground is the leading specialist ground support supplier to the underground mining and tunnelling industries worldwide. With 22 production sites, and feet on the ground in over 70 countries, our people and solutions are never far away. As a global company, DSI Underground is renowned for conducting business with responsibility, integrity, and respect. For all of those, who are affected by our activities.*

*DSI Underground is committed to working with third parties, who share our values and seek to operate to the same standards as we do. This reputation and commitment are an asset for both DSI Underground and our business partners.*

*We are reinforcing progress, reinforcing integrity.*



## Our Policy

Our Global Business Partner Policy is intended to support DSI Underground as it strives to meet the increasing need for transparent management of its broad range of environmental, social, and

governance responsibilities. This Global Business Partner Policy encompasses our approach to working with third parties – agents, distributors, and joint venture partners –, and in

respect of supply chain relations, it should be read in conjunction with our Global Supply Chain Policy and Modern Slavery Act Statement (where applicable).

## Our Requirements

The Global Business Partner Policy applies to all business activities of DSI Underground, and key business partners

are required to provide positive assurance regarding their adherence to the following set of key DSI Underground

practices that derive from our values, policies, and principles.

### Michael Reich

Group CEO, DSI Underground

Luxembourg, 30 September 2019



# *Our Expectations*

## **1. Compliance with all Laws**

Business partners will comply with all applicable laws and regulations in all locations where they conduct business,

including those relating to international trade (such as those relating to sanctions, export controls, and reporting obli-

gations), data protection, insider dealing, and anti-competition laws.

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## **2. Act with Integrity in all Business Dealings**

DSI Underground acts with integrity at all times, and we expect our business partners to behave in the same way. Business partners will not engage in personal activities or public comments that are intended to damage DSI Underground's business interests or reputation.

Business partners must record all business transactions accurately, prudently or transparently, in compliance with applicable accounting standards and recognised best practice.

Business partners should insist and ensure their agents, suppliers, and others working on their behalf to act lawfully and in accordance with the standards set out in this Global Business Partner Policy.

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## **3. Anti-bribery and Corruption**

Business partners will comply with all applicable anti-bribery laws, including the U.S. Foreign Corrupt Practices Act and UK Bribery Act and all applicable local laws where DSI Underground and

its subsidiaries operate.

Business partners will not offer, promise, give (including facilitation payments), demand or accept bribes or other improper

advantage, including excessive gifts and entertainment, in order to obtain, retain or give business.

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## **4. Gifts and Hospitality**

Business entertaining and hospitality involving individuals representing DSI Underground must be kept reasonable

and proportionate and be done entirely to maintain good business relations and not to influence unfairly any future

business decisions. The provision of gifts should be rare and aligned with company policy.

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## **5. Competition Law**

DSI Underground believes in competing fairly in the marketplace. Business partners will comply with all applicable antitrust and competition laws, which

prohibit agreements, business practices, and conduct that are anti-competitive or unreasonably restrain trade. Competitor information will be obtained and main-

tained in accordance with applicable competition laws at all times.



## 6. Conflicts of Interest

Business partners must avoid any situation or relationship that may involve an inappropriate conflict or the appear-

ance of a conflict with the interests of DSI Underground. Business partners must declare all conflicts of interest in all

business dealings to DSI Underground to allow DSI Underground to take appropriate action.

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## 7. Health, Safety and Security

Business partners will provide their employees with a safe and healthy workplace in compliance with all applicable

land laws and regulations. Business partners should protect their employees, physical assets, information, and

reputation from potential security threats, including, cyber security threats.

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## 8. Confidential Information

Business partners will protect all intellectual property and other confidential information provided by DSI Under-

ground. All information provided by DSI Underground, which is not in the public domain, is deemed confidential and

should only be used for its intended purpose.

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## 9. Equal Opportunities and Human Rights

Business partners should recruit, select, and promote their employees solely based on qualifications and skills. DSI Underground will not accept any form of employment discrimination including hiring, compensation, advancement, discipline, termination or retirement

because of race, colour, religion, gender, sexual orientation, national origin, age, or disability.

DSI Underground requires its business partners to uphold all internationally recognised human rights wherever their

operations are located. DSI Underground will not tolerate the use by its business partners or their supply chains of child or compulsory labour, human trafficking, slavery, or any behaviour that does not maintain human dignity and respect.

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## 10. Environment

Business partners will operate in a manner that protects the environment and must comply with all applicable environ-

mental laws, regulations, and standards. Operations, sourcing, manufacture, distribution of products, and the supply

of services should be conducted with the aim of protecting and preserving the environment.

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## 11. Financial Records and Money Laundering

All business dealings must be carried out in a transparent manner and recorded

accurately in books and records. DSI Underground will not tolerate any actual

or potential involvement in money laundering or market abuse.

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## 12. Communication

Business partners will make these principles known to employees dealing

with DSI Underground and promote and monitor compliance.

# Information Required

DSI Underground will require key business partners to provide the following as positive assurance of their commitment:

- Acknowledge receipt of an information letter and confirm the intention, in principle, to apply the key principles listed above by signing and returning the information letter
- Expressly notify DSI Underground should any of the key principles cause specific concerns
- Provide DSI Underground with specific internal company policies, procedures, published reports, and/or other information that show further positive assurance as to adherence to the key practices, upon request

# Whistleblowing Mechanism

Business partners are required to promptly report any suspected or known violations of this Global Business Partner Policy.

Alternatively, you may submit a concern through our whistleblowing platform online, call your local hotline, or use our mobile app.

A person who makes a good faith report about potential misconduct, who experiences retaliation, or other adverse action for raising a concern, should report this immediately.

If you have questions about this Global Business Partner Policy or believe that someone may have violated it, please contact the Legal Department at [legal@dsiunderground.com](mailto:legal@dsiunderground.com).

All reports are duly reviewed and, if appropriate, investigated. DSI Underground will not tolerate retaliation against any person, who is trying to do the right thing by raising a concern.

## Webservice

Website

<https://dsiunderground.whistleblownetwork.net>

## App

DSI Underground Speak Up app

Available on Google Play and App Store

## Local Hotlines

Country	Hotline number	Company Code - UNDER	Language choice
Argentina	+54 800 3458124	86337	EN / ES
Australia	+61 180 0742508	86337	EN
Austria	+43 800 222759	86337	EN / GE
Brazil	+55 800 8870132	86337	EN / PT
Canada / USA	+1 866 2041940	86337	EN / FR
Chile	+56 800 14868	86337	EN / ES
Colombia	+57 180 05189376	86337	EN / ES
Czech Republic	+420 800 022556	86337	EN / CZ
Germany	+49 800 5892841	86337	EN / GE
Indonesia	+62 780 33218041	86337	EN / ID
Mexico	+52 800 6070025	86337	EN / ES
Peru	+51 800 71556	86337	EN / ES
Poland	+48 800 012197	86337	EN / PL
Russia	+7 800 3017139	86337	EN / RU









**Whistleblowing Mechanism**

<https://dsiunderground.whistleblownetwork.net>



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