



Dalpo Group Code of Ethics

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Dalpo Code of Ethics

The Code of Ethics was created out of the need to describe the rules of conduct throughout the Dalpo Group, in order to raise awareness among all employees and business partners. These principles stem directly from our corporate values and are based on the need to adhere to ethical standards and clearly defined norms of conduct in both social and professional relationships. Adherence to ethics is a source of values that benefit our relations with the environment in the workplace as well as outside it.



The purpose of the Code is to help us make the right choices by pointing out key benchmarks and ethical standards in our professional activities. The Code also aims to help eliminate negative phenomena and behaviours that most often stem from ignorance. Adherence to the following values and principles in daily work is expected of all employees as well as business partners.



Business Ethics

● Respect for companies and people

1. All employees are treated with dignity and respect.
2. Verbal abuse of employees, mental and physical coercion are not tolerated. The Dalpo Group expects a similar attitude from all its partners, both in cooperation and in relationships with other entities or individuals.

● Control of data transfer / disclosure

1. Employees of the Dalpo Group are committed to fast and uninterrupted flow of information. Knowledge and information should be transmitted immediately, comprehensively and without adulteration to the appropriate addressees.
2. Each of our employees is required to comply with data protection requirements, as well as laws relating to the protection of information and safeguarding against the misuse of confidential, secret and personal data.
3. Every employee is obliged to keep trade and business secrets by virtue of performing certain functions in the company.

● Anti-Corruption

1. We operate in an open, direct and honest manner, complying with antitrust laws and fair competition norms.
2. Employees of the entire Dalpo Group are not allowed to offer their current and potential business partners any financial benefits. It is also forbidden to provoke customers and suppliers to offer gifts or favours to employees.
3. The Board of Directors of all Dalpo Group companies does not condone any activities bearing the hallmarks of corruption that may give the impression of an attempt at bribery.
4. Employees are required to prevent corruption, and are responsible for actively communicating the objectives of the following anti-corruption policy while performing their duties.

● Prohibition of unfair competition

1. Each of our employees is required to comply with the principles of competition and antitrust laws. This means that they shall not hold discussions with competitors in which prices, business terms and the Group's know-how are discussed.
2. It is unacceptable to favour or exclude business partners.
3. We expect our business partners to take full responsibility for their own conduct in order to guarantee fair competition.

● Protection of intellectual property

1. Dalpo Group does not infringe on the intellectual property of others through unauthorized copying, use, distribution or modification.



Business Ethics

● Conflict of interest

1. Dalpo Group's management makes decisions on cooperation with business partners solely on the basis of objective criteria that are not influenced by personal interests and relationships.
2. We place great emphasis on ensuring that our employees, in the course of their professional duties, do not enter into relationships with customers, external suppliers that may result in biased choices and lack of objectivity.
3. Any employee who works or provides services for other companies cooperating with the Dalpo Group should report this fact in writing to the Human Resources Department and inform the Board Member of the relevant division. If a conflict of interest arises, such activities should be terminated.



Health and safety

1. We comply with standards and safety regulations.
2. We are responsible for the safety and health of our employees. We guarantee protection and safety at work in accordance with current regulations.
3. By constantly improving the work environment, we strive to improve the quality, as well as the productivity and satisfaction of employees with their work. Each of our employees is required to comply with health and safety regulations.
4. Every Dalpo Group employee has access to private medical care from the first day of employment.



Countering harassment and discrimination

1. We comply with applicable employment laws and expect all our employees to treat each other with dignity and respect.
2. We do not discriminate against anyone based on their nationality, race, gender, religion, political affiliation, disability, sexual orientation, or any other reason.
3. Our principle is to find, hire and support employees based on their qualifications and skills. We prohibit our employees from displaying any form of discrimination (e.g., bullying, harassment, acting to someone's detriment) and support partnerships based on mutual respect for one another.
4. Dalpo Group bases its organizational culture on the values and individual needs of its employees. It creates development opportunities for employees and organizes training without discriminating against anyone.



Forced labor and child labor

1. We respect basic human rights.
2. Regardless of the circumstances, the employment of children is absolutely prohibited.
3. In the hiring process, we respect the minimum age in accordance with national regulations. The age of those hired is reviewed by our Human Resources department.
4. Any form of forced labour through restraint or threat of physical violence as discipline or control is prohibited.
5. The above principles should also be followed by our business partners, suppliers and subcontractors.



Environmental responsibility

1. We operate in accordance with applicable environmental laws, regulations and permits.
2. We are responsible for the continuous improvement of our products to make them increasingly environmentally friendly. We apply the best available practices in the technologies we use to minimize our environmental impact. Each of our employees ensures that natural resources are used sensibly and economically, and that their activities do as little harm to the environment as possible.
3. Dalpo Group's goal is to keep the environmental impact of our operations as low as possible by maximizing the use of our capabilities and modern technologies, while taking into account economic aspects.
4. The production process is planned to reduce the amount of waste generated, and the segregation of waste at the site makes us a co-author of reuse.
5. Environmental issues are handled responsibly. The goal is to develop and disseminate environmentally friendly technologies. By 2033, Dalpo Group pledges to reduce its carbon footprint by 50%.



Knowledge and availability of the code

1. All employees, regardless of their position in the organization's structure, have the opportunity to familiarize themselves with the values and principles set forth in this Code of Ethics.
2. Each supervisor ensures that employees in their area know and apply the Code of Ethics.
3. If questions or ambiguities arise regarding the application of the Code of Ethics, the first person to contact is the supervisor. The employee can also report to the Human Resources Department on this matter.
4. The Code of Ethics is available at www.dalpo.pl and from the immediate supervisor.