

DIMARK Group

SUPPLIER CODE OF ETHICS

I. INTRODUCTION

The DIMARK Group has been building its market position for years based on ethical values, social responsibility, and sustainable development. Our reputation is the result of the work of the entire team – but also of fair cooperation with our business partners.

We expect our suppliers to share these same principles, consistently applying them in their operations. The Supplier Code of Ethics is an expression of our commitment to jointly building a responsible, ethical, and transparent supply chain.

This document contains a set of key principles that constitute a condition for cooperation with the DIMARK Group. Adherence to these principles is not only a matter of compliance with legal regulations, but also an expression of shared values and concern for people, the environment, and future generations.

II. PURPOSE OF THE CODE

The purpose of the Supplier Code of Ethics is to ensure that all DIMARK Group business partners operate in an honest, transparent, and responsible manner.

This document defines common ethical, social, environmental, and legal standards that aim to:

- (i) promote a sustainable and responsible supply chain,
- (ii) foster mutual trust and respect in commercial relationships,
- (iii) minimize legal, reputational, and operational risks,
- (iv) ensure compliance with applicable regulations and good market practices.

This Code serves as a reference point for decision-making and a foundation for building long-term and ethical cooperation.

1. Scope of Application

The provisions of this Code apply to all DIMARK Group Suppliers, regardless of their legal form of business – whether individuals or legal entities – who provide services, goods, or work to the DIMARK Group, their place of business, company size, or the nature of their services. The provisions of the Code also apply to subcontractors, partners, and Supplier employees involved in the implementation of cooperation with the DIMARK Group.



Order No. 4/09/2025

of the DIMARK Capital Group
with its registered office in Złotkowo (62-002),
ul. Zachodnia 3, Złotkowo, Suchy Las
dated September 24 2025

on the introduction of the DIMARK Group Supplier Code of Ethics

1. Based on internal regulations and to ensure compliance of cooperation with suppliers with the values and ethical principles of the DIMARK Group, **the Supplier Code of Ethics is hereby introduced, the text of which is attached to this Order.**
2. The relevant departments (in particular the Purchasing Department) are obligated to:
 - (i) disseminate the Code to all current and future suppliers,
 - (ii) ensure ongoing monitoring of compliance with the principles contained in the Code.
3. The Supplier Code of Ethics comes into effect on the date of signing of this Order and applies to all new contracts and, to the extent possible, to continued cooperation with current suppliers.

Złotkowo, September 24 2025



Dymitr Kopras

President of the Management Board (CEO)



Błażej Nowakowski

Vice President of the Management Board
(CTO)



Marcin Szejter

Member of the Management Board,
Chief Financial Officer (CFO)

Attached:

- DIMARK Group Supplier Code of Ethics

2. Key Ethical Principles

2.1. Integrity and Business Ethics

Suppliers are obligated to:

- (i) Comply with the principles of fair competition and transparency.
- (ii) Prohibit all forms of corruption, bribery, extortion, "facilitating payments," or kickbacks.
- (iii) Maintain accounting records in accordance with applicable law.
- (iv) Maintain transparency in purchasing and accounting processes.
- (v) Avoid unethical conduct, such as false statements, manipulation of information, or concealment of important data.

2.2. Conflict of Interest

Suppliers are obligated to report potential and actual conflicts of interest, particularly situations that could result in a personal, family, or financial relationship with DIMARK Group employees.

2.3. Gifts and Hospitality

Only small promotional gifts of symbolic value are permitted.

Offering DIMARK employees money, gifts, invitations, travel expenses, or other benefits that could influence the objectivity of business decisions is prohibited.

3. Respect for People

The DIMARK Group expects Suppliers to:

- (i) Ensure equal treatment and prohibit any discrimination, regardless of gender, age, race, religion, sexual orientation, disability, nationality, or beliefs.
- (ii) Respect for human rights, including the prohibition of forced labor, slave labor, human trafficking, and child labor.
- (iii) Ensure decent working conditions, adherence to local and international labor laws, and ensure safe and healthy working conditions.
- (iv) Implement procedures to counteract mobbing, harassment, and all forms of bullying.



4. Health, Safety and the Environment

Suppliers are obligated to:

- (i) Comply with occupational health and safety regulations and ensure healthy and safe working conditions.
- (ii) Implement measures to reduce negative environmental impacts.
- (iii) Manage natural resources rationally and responsibly.
- (iv) Reduce emissions, promote recycling, and promote climate action.

5. Quality and Innovation

Suppliers must:

- (i) Provide products and services that meet the quality requirements of the DIMARK Group and applicable industry standards.
- (ii) Promote innovation, invest in technological development, process optimization, and sustainable development.
- (iii) Comply with international quality, environmental, and technical standards.

6. Compliance with Laws and Sactions

Suppliers are obligated to comply with all applicable laws, in particular:

- (i) Anti-corruption, tax, and customs regulations.
- (ii) Regulations regarding economic sanctions and international embargoes.
- (iii) Competition and anti-money laundering regulations.

7. Confidentiality and Data Protection

Suppliers are obligated to:

- (i) Maintain the confidentiality of information obtained during cooperation with the DIMARK Group.
- (ii) Secure personal data in accordance with the provisions of the GDPR (or other applicable regulations).
- (iii) Not using confidential information in a manner contrary to the interests of the DIMARK Group.

8. Implementation of the Code

Suppliers undertake to:

- (i) Communicate the principles of the Code to all their employees, subcontractors, and partners.



- (ii) Collaborate with the DIMARK Group on audits, verification, reporting, and control activities.
- (iii) Take immediate corrective action if non-compliance is identified.

9. Consequences of Violations

Violation of the provisions of the Supplier Code of Ethics may result in:

- (i) A request to immediately remedy the non-compliance,
- (ii) Suspension or limitation of cooperation,
- (iii) Termination of the contract due to the Supplier's fault,
- (iv) In extreme cases, reporting the violations to the relevant authorities.

10. Confirmation

The Supplier confirms by signature that it has read and accepted the principles of this Code and undertakes to comply with them.

Company / Seal

Representative's name and position

Signature

Date and place

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