

CODE OF ETHICS

DIMARK Group

Złotkowo, 16th of December 2024

Foreword

DIMARK provides reliable, high-quality and innovative systems for sorting, screening and transporting baggage and parcels, dedicated to airports. We support our customers with knowledge, experience and an individual approach - from concept, through production and installation, to service. Founded in Poznań in 1994 as a manufacturer of conveyor equipment, the company is now a global player serving customers worldwide.

Anti-corruption and ethics, high standards of work, human rights and care for the natural environment are among our priority values.

The Code of Ethics applies to all Employees of the DIMARK Group. Managers have a duty and a particular responsibility to create a work environment in which ethical conduct is encouraged.

In accordance with the principles set out in this Code of Ethics, the Company has also issued a Whistleblowing Procedure for reporting serious breaches of law at DIMARK.

We firmly believe that compliance with the Code of Ethics is essential to the Company's continued success. We thank all Employees for their efforts in this regard.

PURPOSE OF THE CODE

The purpose of the DIMARK Code of Ethics is to shape the Company's culture and ethical standards, with particular emphasis on the reputation that we have built together over many years. How we achieve our goals matters, because customers who entrust us with their projects must be confident that we act ethically and professionally. By acting in accordance with the adopted standards and procedures, we provide our Customers with the highest quality products that we manufacture and deliver. DIMARK stands for reliability, as all our solutions comply with international standards, norms and industry requirements.

President of the Management Board of DIMARK

INTRODUCTION / GENERAL PRINCIPLES

The Code of Ethics applies to all Employees and Members of the Management Board. Through a series of principles and specific requirements, the Code of Ethics sets out the rights and obligations of Employees and Members of the Management Board and provides a basis for responsible conduct by Employees and Members of the Management Board.

The Code of Ethics may not provide an exhaustive overview of all matters relating to workplace ethics at DIMARK. Ultimate responsibility for acting in accordance with the law and ethical standards always rests individually with each Employee and each Member of the Management Board.

Compliance with the law

All Employees and Members of the Management Board must always comply with applicable laws, ethical principles, internal policies and instructions, and the provisions of the Code of Ethics, and must make decisions responsibly.

The use of slave labour, child labour, human trafficking, sourcing raw materials from conflict-affected areas, and any action contrary to these principles are unacceptable, including when committed by entities cooperating with us. Violations of any other personal, political, economic, social or cultural rights to which every person worldwide is entitled are also unacceptable.

Acting with integrity

All Employees and Members of the Management Board should act with integrity when carrying out activities for DIMARK. Personal integrity means doing the right thing in every situation. We should always be honest, truthful and reliable, and treat co-workers with respect while protecting their safety and dignity. We should act in accordance with DIMARK's corporate values, as set out in the Code of Ethics, and promote them by acting responsibly towards colleagues, business partners and society.

Protection of DIMARK property and reputation

All Employees and Members of the Management Board should protect DIMARK's property and reputation. DIMARK's reputation is an important element of our success. Employees and Members of the Management Board should avoid any acts or conduct that could damage DIMARK's reputation.

All Employees and Members of the Management Board should act reasonably and carefully to protect buildings, machinery, equipment and other property - particularly property entrusted to them for direct use - against misuse, theft, damage or destruction.

Equal opportunities and prevention of discrimination

All Employees are treated with dignity and respect. The Company provides equal opportunities to all Employees. Discrimination or harassment based on race, ethnic origin, sex, physical disability, sexual orientation or religion is not tolerated. All Employees with the same qualifications, training and skills receive equal pay for equal work.

Respect for human rights / forced labour / child labour

The Company does not use, either directly or indirectly, any form of forced labour or any other form of involuntary labour, including prison labour, slave labour, undocumented workers or any other unpaid workers.

The Company recognises and respects every child's right to protection from economic hazards and exploitation and from performing any work that may be dangerous. The Company complies with applicable laws and international standards concerning child labour.

The minimum age of Employees must not be lower than 15 and must comply with:

- the national minimum age for employment, or
- the age at which compulsory education is completed, whichever is higher.

No person under the age of 18 may be engaged in work that may be hazardous, interfere with the child's education, or be harmful to the child's health or physical, mental, spiritual, moral or social development, including night work.

Care for the natural environment

The Company complies with all applicable environmental laws and regulations.

We understand the importance of conducting business in an environmentally responsible manner. We believe that it is possible to conduct business in harmony with nature, and therefore we continuously strive to minimise our impact on the environment. We implement measures aimed at reducing our adverse environmental impact, including reducing the use of harmful chemicals, limiting pollution, improving efficiency, and reducing greenhouse-gas emissions in production and transport, the levels of which we report.

Working Conditions

The Company provides its Employees with a healthy and safe work environment and continuously strives to improve working conditions.

Employees receive regular, documented occupational health and safety training. Before starting work, each new Employee completes mandatory initial occupational health and safety training. In accordance with occupational health and safety regulations, periodic training is provided to Employees working in the Company. Employees regularly receive training on workplace safety regulations and practical instruction enabling them to operate machinery correctly and safely.

Employees should inform their immediate supervisors of important matters concerning health and safety in the workplace, consumer health, and the impact of DIMARK's activities on the natural environment. Employees are encouraged to raise occupational health and safety concerns directly with their colleagues.

Combating Prohibited Conduct

All Employees and Members of the Management Board should avoid conduct that may be perceived as Prohibited Conduct.

DIMARK aims to create a friendly and safe workplace in which Prohibited Conduct is not tolerated. To achieve this goal, all Employees and Members of the Management Board should treat colleagues, customers, business partners and other people with respect. Employees and Members of the Management Board should avoid all forms of Prohibited Conduct towards colleagues or business partners, including conduct that may be perceived as offensive or degrading. Supervisors should treat their subordinates with respect and courtesy; they must not humiliate them in front of others, insult them, undermine their competence, shout at them, or use offensive or vulgar language towards Employees or other people.

Confidential Information

All Employees and Members of the Management Board are required to exercise the utmost care in protecting all information obtained while performing their official duties and to keep confidential all information that is not publicly available.

Employees and Members of the Management Board maintain confidentiality of information, protect DIMARK's good name and comply with applicable laws. They build relationships with customers, business partners and society through trust and communication. Employees and Members of the Management Board must not disclose Confidential Information to people outside DIMARK unless DIMARK has authorised the disclosure or the disclosure is required by law.

Confidential Information accessed by an Employee or a Member of the Management Board in connection with the performance of duties for a DIMARK entity must remain confidential even after the cooperation with that entity has ended.

Avoiding conflicts of interest

All Employees and Members of the Management Board should remain loyal to DIMARK and avoid all conflicts of interest.

Employees and Members of the Management Board should not seek to obtain any benefits, including personal benefits, by acting for entities that compete with DIMARK. No person should participate in, or attempt to influence, decisions if doing so may give rise to an actual or apparent conflict of interest.

Employees or Members of the Management Board who become aware of a potential conflict of interest should immediately inform their direct supervisor.

Prevention of corruption and bribery

Corruption in any form is not accepted, including bribery, extortion, illegal commissions, abuse of authority, or failure to perform duties in relation to customers, agents, contractors, suppliers, Employees or public officials. All forms of corruption must be prevented.

Sanctions

Financial sanctions are an important part of the global fight against financial crime and are imposed by governments worldwide to restrict or prohibit trade with foreign businesses that are involved, or suspected of being involved, in illegal activities.

Responsible DIMARK Employees must regularly verify that they are not doing business with people, groups, entities or countries appearing on the sanctions lists indicated below:

- the UN Consolidated Sanctions List published at:
<https://www.un.org/securitycouncil/content/un-sc-consolidated-list>
<https://sanctionssearch.ofac.treas.gov/>
- the EU Consolidated List of people, groups and entities subject to EU financial sanctions, published at http://eeas.europa.eu/topics/sanctions-policy/8442/consolidated-list-of-sanctions_en, or any similar sanctions list issued, maintained or made public by any sanction's authority.

Compliance with competition laws

Employees and Members of the Management Board should contribute to fair competition and comply with the principles set out in generally applicable laws concerning fair competition.

DIMARK complies with all applicable competition-protection laws and does not engage in improper practices that may restrict competition or be intended to obtain an unfair advantage.

DIMARK follows the principles of fair competition. It always treats competitors with respect and does not mislead them in business communications or arrangements. Employees involved in marketing, sales, purchasing and logistics, as well as Members of the Management Board, should be familiar with generally applicable fair-competition laws, DIMARK's internal regulations, and marketing and sales guidelines.

Prohibition on involvement in money laundering

Employees and Members of the Management Board must not become involved in money laundering in any way. The following activities are regarded as money laundering:

1. the conversion or transfer of property, knowing that it is derived from criminal activity or participation in such activity, for the purpose of concealing or disguising the illicit origin of the property, or assisting any person involved in such activity to evade the legal consequences of that activity;
2. the concealment or disguise of the true nature, source, location, disposition, movement, rights with respect to, or ownership of property, knowing that the property is derived from criminal activity or participation in such activity;
3. the acquisition, possession or use of property, knowing at the time of receipt that the property is derived from criminal activity or participation in such activity;
4. participation in, association with, or an attempt to commit any of the acts referred to in points 1-3 above, as well as aiding, abetting, facilitating or advising in connection with the commission of any such act.

Money laundering is prohibited by law, and DIMARK will not tolerate such conduct. If an Employee observes activities that may indicate money laundering in connection with DIMARK's operations, the Employee should immediately notify their direct supervisor.

Freedom of association and the right to collective bargaining

Employees may freely express their political views and engage in political activity outside work. Employees may freely join employee associations of their choice and participate in, or be included in, collective bargaining.

Duty to comply with the Code of Ethics

Each Employee and each Member of the Management Board bears personal responsibility for complying with all obligations set out in the Code of Ethics. Employees and Members of the Management Board must not act, or encourage others to act, contrary to the Code of Ethics.

A breach of the requirements set out in the Code of Ethics may result in disciplinary or financial penalties, notice of termination or termination of an agreement, or even the initiation of criminal proceedings.

Reporting breaches of the Code of Ethics and the law - Do not remain indifferent

Early reporting of possible breaches or irregularities in the Company's activities is very important to us. We believe this can prevent further escalation of a problem and create an opportunity for an amicable resolution of the situation.

For this purpose, we provide every Employee with the opportunity to report observed irregularities and concerns about whether actions comply with procedures. Any Employee who notices irregularities in the Company's activities or in compliance with the Code or any other internal procedure may submit a report through a channel of their choice:

- internal channels: <https://dimark.liniaetyki.com/>
- channels established by the Office of the Commissioner for Human Rights, acting as the central authority appointed to receive reports concerning breaches of law; other public authorities within the scope of their responsibilities; and, where appropriate, institutions, bodies, offices or agencies of the European Union (external reports).

Reports on irregularities are reviewed and verified by the Ethics Committee within no more than three months from the date on which a report is submitted. If, after reviewing a report, it is determined that a breach has in fact occurred, steps are taken immediately to remedy the adverse consequences of the breach and eliminate the possibility of a similar breach occurring in the future. People making reports are treated as acting in the Company's best interests. An Employee reporting irregularities is provided with special protection, particularly regarding their identity. Retaliation against reporting people is prohibited and may constitute grounds for disciplinary liability.

Whistleblower protection and the procedure for reporting irregularities are regulated in detail in our Whistleblowing Procedure.

Final provisions

The Code of Ethics enters into force one week after it is communicated to the Employees of the DIMARK Group.

Each newly hired Employee is required to familiarise themselves with the contents of the Code of Ethics.

Each Employee is required to comply with the Code of Ethics.