# Code of Conduct Dijo Fun&Food

**This Code of Conduct is a set of ethical principles and standards outlining expected behavior.** The Code does not change the terms and conditions of employment or create any contractual rights for any employee, shareholder, customer, supplier, consumer or competitor.

# **Our values**



#### I. OUR COMMITMENT TO INTEGRITY

### Our shared commitment to integrity

- Learn the standards of conduct that apply to your work and activities.
- Always follow these standards.

#### What is the purpose of this Code?

Dijo is committed to conducting its business in accordance with the letter and spirit of the law and the highest standards of ethical business conduct.

The Code of Conduct points us all in the direction of navigating the business environment.

The Code provides an introduction to important regulations and policies that apply to everyone who works for Dijo Fun & Food. The Code is also a resource that helps each of us:

- Know how to proceed
- Know who to ask for advice and when
- Know where we can look for signposts as to the right course of action.

# Who is obligated to comply with this Code?

The Code applies to employees of Dijo Fun & Food, regardless of title, status or ownership. This includes our board of directors, managers and employees.

Unless otherwise indicated, all references in this Code to employee(s) shall be construed as references to both employees and the Director.

# What are my responsibilities as an employee?

You are responsible for knowing and complying with the Code and the standards contained herein. New employees will be asked to certify their commitment to the standards of conduct contained in this Code.

The employee is also responsible for seeking advice when necessary, raising concerns and reporting potential violations of this Code to management.

#### You will act in accordance with the Code if:

- Understand and abide by the rules and standards that apply to your work and our Company; work with others to help them become familiar with applicable requirements.
- Looking for guidance. This Code does not contain all the answers and you are not expected to know all the answers. You are expected to ask for help and consult others when the right course of action is unclear to you.
- You stick to the rules. Never compromise our standards (or your personal integrity) to achieve other goals. If the opportunity arises to take ethical shortcuts, know that you are expected to do the right thing and have the full support of management in doing so.
- You speak out. You have a responsibility to speak up if something doesn't seem right. Don't assume that everyone else doing it makes it all right, that management already knows about it, or that someone else will address it. In addition to raising concerns, we also encourage you to provide ideas to help us better manage our compliance responsibilities.

## What is the role of managers and supervisors?

If you manage or supervise others, you have been given special trust. To maintain this trust, you must:

- Be a positive role model. Lead by example. Show what it means to act with integrity in daily decisions and actions. Take responsibility and be accountable for your behavior and the behavior of your team.
- Raise awareness and understanding. Use your knowledge of our business to help those around you identify and address ethical and compliance risks.
- Set appropriate goals. Communicate and reinforce the message that everyone must act in accordance with these standards of conduct, regardless of other goals set. Don't set goals that you know will contradict our values and standards.
- Response. Respond appropriately to anyone who raises compliance or ethics concerns, enlisting other resources as needed.
- Monitor the conduct of those you supervise, and if that conduct does not comply with our standards, take action in a fair, appropriate and consistent manner.

## Does the Code explain all the standards I need to know?

The Code is the cornerstone of our commitment to fairness - it provides a basic overview of the many problems that may arise. But the Code cannot anticipate every problem that may arise or describe every law or policy that may apply to a situation you encounter. Other policies and procedures that are not described in this Code also apply to Employees. Remember that everyone's role is different, so no matter what position you work in make sure you know the rules and policies that apply to you. If you are ever unsure, you should discuss any concerns with your supervisor or someone in the legal department.

### Who has the authority to amend or repeal any of the provisions of this Code?

This Code of Conduct may be amended or modified only by the Board of Directors of Dijo Fun & Food. What actions may constitute a violation of this Code?

Here are some examples of actions that may expose employees to disciplinary action under the Code:

- Violation of applicable laws, regulations or Company standards.
- Directing or encouraging others to violate applicable laws, regulations or Company standards.
- Failure to report known or suspected violations of applicable laws, regulations or Company standards.
- Non-monitoring of the conduct of subordinates, service and goods suppliers for whom Dijo has supervisory responsibility.
- Being uncooperative or untruthful during an investigation.

- Retaliating against others for reporting or raising in good faith concerns about compliance with the Code of Conduct or other ethical issues.
- Other behaviors inconsistent with a business environment of high integrity and commitment to the law.

## What are the consequences of violating the Code?

Anyone who violates our Code or its underlying principles may be subject to disciplinary action. While the specific type of disciplinary action will be based on the specific circumstances and severity of each case, it may include one or more of the following:

- Oral and/or written warning.
- Suspension.
- Degradation.
- Reduction in compensation.
- Disqualification from incentive pay.
- Termination.
- Civil Penalties .

In addition to these actions, if a criminal act is committed, the Company may refer the matter to law enforcement authorities. Violations of the law may result in legal action against you, your colleagues or the Company with serious consequences.

# How will compliance with the Code be monitored and enforced?

The Code of Conduct is more than just a description of our standards of conduct. It is the centerpiece of a global ethics and compliance program that supports our values and is supported by our board and senior leaders. The following functions play a key role in oversight and enforcement:

- The Company's Board of Directors sets the strategic direction for the Company's compliance program and monitors the results.
- The Ethics Officer supports and advises the Board of Directors on the Company's ethics and compliance program, including receiving reports from management on compliance with this Code as required.

These oversight mechanisms help ensure that the code of conduct is consistently enforced throughout the company and that individuals at all levels are held accountable for their conduct.

#### II. OUR COMMITMENT TO OUR CUSTOMERS AND THE MARKET

#### **Our commitment**

Dijo Fun & Food prioritizes the production of delicious food that meets the trust our customers place in us, and works diligently to meet the highest standards of safety and quality in every aspect of our business - from sourcing to food preparation and delivery. In all our business dealings, we strive to be honest We will compete vigorously but fairly and and in accordance with all regulations that protect the integrity of the market.

# Food safety and product quality

Food safety and product quality are at the heart of how we do business and achieve our vision and mission. We strive to always exceed our customers' expectations by providing the highest quality products in an environment that is clean, attractive, safe and convenient.

The integrity of our products depends on employees always adhering to food safety practices that are consistent with the high standards of our brands and all legal, quality and contractual requirements. We should not allow anything, including costs, to interfere with this commitment. Food safety is everyone's responsibility.

### **Expectations:**

- Comply with all legal, quality and contractual requirements that govern how we manufacture our products.
- Only raw materials that meet our specifications and come from approved suppliers.
- Follow our food safety standards.

- Learn, follow and perform food handling and preparation procedures, including proper personal hygiene.
- Report anything that could jeopardize our commitment to product safety and quality.

## Get back to me if you see one:

- Reducing food safety or product quality to meet production or performance goals.
- Fabricating food safety test results.
- Doing anything that could jeopardize our commitment to food safety and product quality.

### III. CUSTOMER

Our culture includes recognizing, valuing and respecting the diversity of ALL customers. No customer should be treated differently because of race, color, creed, religion, national origin, social or ethnic background.

## Fair competition

Our goal is to stay ahead of the competition. We strive to grow fairly and dynamically. We have a great recipe for success - we do not have to and will not resort to unfair, unethical or dishonest means to have an advantage.

We strictly adhere to the laws of "competition" - laws that form the basis of the free market. Competition laws generally prohibit anti-competitive agreements, such as agreeing with competitors to fix prices or divide markets, and other behavior that undermines fair and open markets.

# **Expectations**

- Compete on the merits of our products and customer service and do not attempt to limit competition.
   We differentiate ourselves from competitors based on factual comparisons .
- Present only true information about our products.
- Avoid contacts with competitors that may give the impression of improper arrangements, side deals or informal agreements.
- Select vendors, suppliers and other third parties only on the merits of their products, making it clear that we expect full and fair competition for our business.
- Keep confidential information about our company, as well as its customers and suppliers, strictly confidential.

# Get back to me if you see one:

Entering into agreements or discussions with a competitor regarding:

- Pricing, pricing formulas, costs or profits.
- Marketing plans or sales areas.
- Terms of Sale.
- Market shares, capacity or production volume.
- Allocation of customers or product lines.
- Suppliers, sourcing or distribution methods.
- Engage in unfair or deceptive business practices.
- Gathering information about competitors through improper, misleading or unfair means.
- Making false or unsupported negative statements about our competitors' products or companies.

#### **Gifts and Entertainment**

Business courtesies - which include gifts (branded or not), favors, buying meals, services, transportation, lodging and entertainment - are often exchanged as part of building a good working relationship. While business courtesies can build goodwill, they can call into question the motives behind the person who provides them . In short, business courtesies can create their own "conflicts of interest."

We make business decisions based on merit for the Company. So, as a general rule of thumb, never offer a business courtesy if it may cause you to try to influence a business decision (current or future). Likewise, never ask for or accept business courtesies from a third party,

such as suppliers or customers (current or potential), if it may be perceived as compromising your objectivity in making business decisions. In all cases, expenditures related to business courtesies you provide must be completely and accurately recorded with sufficient detail in the Company's books and records, such as expense reports and relevant accounts in the Company's general ledger.

Employees and associates may donate samples and gifts or samples with a total value of up to PLN 100 per year. The donation of samples or gifts worth from PLN 100 to PLN 250 requires the approval of the immediate supervisor, from PLN 250 to PLN 500 the approval of the Finance Director, and above the amount of PLN 500 the approval of the President of the Company.

An employee and associate may accept samples and gifts or samples with a total value of up to PLN 100 per year. Acceptance of samples or gifts of gifts with a value from PLN 100 to PLN 250 requires the approval of the immediate supervisor, from PLN 250 to PLN 500 the approval of the Finance Director, and above the amount of PLN 500 the approval of the President of the Company.

## **General requirements**

Business courtesies can only be offered, given or accepted if:

- It is reasonable in terms of the amount, not cash
- Are offered or given for general goodwill purposes, such as recognition, in connection with the promotion, demonstration or explanation of the Company's products; and
- Public disclosure of business courtesies is unlikely to cause embarrassment or damage the reputation of those involved
- It is legal and permissible under local laws, government regulations, and the policies of the organization represented by the person offering, accepting, or receiving the courtesy; and
- This is permitted in accordance with specific local or regional policies adopted for your market, authorized at the appropriate level of Company management, and is properly reflected in the Company's books and records;
- It is not offered, given or accepted when the purpose is to unlawfully influence government officials or business decision-makers to abuse their position or influence their actions
- Does not include venues and activities that include "adult entertainment" or any illegal event, substance or object.

If you are unsure about the application of these requirements, seek advice from your supervisor or management or possibly a cooperating law firm. If you receive a gift or offer that you believe may violate these requirements, but for some reason you feel you should not return or reject it, you must obtain approval from your supervisor to keep it.

## **Government officials**

Gifts and entertainment offered to government officials pose special risks. Before offering or giving a business courtesy to a government official, you must ensure that:

- No law or local company policy will be violated.
- Courtesy is directly related to the promotion, demonstration or explanation of the Company's products (for example, gifts of logos promoting our brands or a meal to demonstrate a new product offering)
- Courtesy has a nominal value (irrelevant to both giver and receiver) and is offered only to reflect respect and goodwill, such as gifts for traditional holidays or special life events such as weddings and births.
- There is no decision regarding our company pending before the government official receiving the gift or the government official's direct reports.
- You have the approval of your Supervisor or the Board of Directors, and all submissions have taken place in accordance with the terms of company policy.

### **Expectations:**

- Use common sense, moderation and discretion when giving and receiving business courtesies.
- Familiarize yourself with the rules and regulations that may apply before offering or accepting business courtesies, especially if government officials are involved.
- Choose venues that are appropriate and moderate in cost, such as restaurants, sporting events, theater or other social or cultural events.

 Notify your supervisor and/or Management whenever a business courtesy received, given or offered violates these standards.

#### Get back to me if you see one:

- Requesting or accepting business courtesies with the expectation of receiving something in return.
- Giving or receiving any cash gifts (or cash equivalents such as gift certificates, bank checks, money orders, investment securities, negotiable instruments, loans, stocks or stock options).
- Participating in activities that would cause the person giving or receiving a business courtesy to violate the standards of his or her own employer.
- Engaging in any entertainment or activity that is illegal, unethical, sexual or otherwise inconsistent with our values and standards.
- Inaccurate recording of business courtesies in accordance with Company policy reporting requirements.

### IV. COOPERATION WITH SUPPLIERS

Our suppliers are valued partners in the success of our business. Our relationships with suppliers must be characterized by integrity. Suppliers should be selected based on competitive factors such as quality, service, technology and price. In addition, suppliers should share our commitment to ethics, compliance and sustainability.

## **Expectations:**

- Work only with suppliers that comply with applicable legal requirements and company standards related to labor, employment and safe working conditions.
- Provide suppliers with competitive opportunities to win business, including small businesses and businesses owned by women, minorities or the disadvantaged.
- Protecting proprietary information exchanged with suppliers through confidentiality agreements.
- Honor commitments, contracts and agreements made with suppliers.

# Report if you see:

- Potential conflicts of interest in supplier selection, such as accepting inappropriate gifts, bribes or other benefits.
- Business transferred to a company owned by a relative or close friend without first disclosing the conflict of interest to management.
- An abusive or harassing work environment, unsafe conditions or other mistreatment of workers at supplier facilities.

## Additional information and guidance

- Familiarize yourself with the Supplier Code of Conduct.
- Dijo Fun&Food is committed to conducting its business in a legal and socially responsible manner. We require suppliers to comply with all legal requirements and encourage ethical business practices.

#### Global trade

Dijo Fun & Food as a company with a global scope, recognizes its responsibility to the countries in which it operates.

We strive to comply with the laws, rules and regulations of all government and regulatory agencies that apply to our business.

In addition, a number of countries impose restrictions on exports and trade transactions with certain other countries, entities and individuals, and covering certain activities. Trade restrictions take various forms, including bans:

- Exporting to a banned country.
- Imports from a specified or sanctioned country or trading in real estate from a specified or sanctioned country.
- Travel to or from a sanctioned country.
- New investments in the sanctioned country.

# **Expectations**

- Comply with all relevant international trade control regulations as they relate to imports and exports.
- Ensure that Dijo Fun&Food or its agents provide accurate and complete import declarations and information to government authorities.
- Check business transactions against applicable regulations that restrict transactions with sanctioned countries, individuals and prohibited end-users.
- Check business relationships with customers, suppliers and other third parties involved in international transactions on watch lists provided by the government.

### Report if you see:

- Making a false declaration on customs forms or to government authorities.
- Use of invoices for imported goods where the price quoted does not reflect the full value or the description of the goods is not complete or the country of origin is not correctly identified.
- Paying money to an intermediary as a pass-through or avoiding disclosure of the country where the money goes.
- Financial transactions and transactions involving the sanctioned state or designated persons and entities.

Trade restrictions also include licensing requirements for the export of certain products or technologies. The list of banned countries and restrictions changes with changing global policies.

For this reason, if your work involves selling or shipping overseas, make sure you are up to date on applicable regulations and contact your legal department if you are unsure. Also check export requirements for transferring technology or products to another country.

"Exporting" is not just the transfer of physical goods - it can include the transfer of proprietary information to a citizen of another country by:

- Email or telephone interviews.
- Face-to-face or online discussions

#### V. CONFLICTS OF INTEREST

"Conflicts of interest" arise when someone's personal, social, financial or political activities or interests interfere or appear to interfere with one's loyalty to the Company or ability to make impartial decisions regarding the Company's affairs. Conflicts of interest may also arise when an employee or director, or a member of the employee's or director's immediate family, benefits or even appears to benefit from a business arrangement.

Employees and directors of the Company must avoid or disclose and obtain pre-approval if they may have an actual or perceived conflict of interest.

### **Examples of potential conflicts of interest include:**

- Having more than an insubstantial ownership and/or financial interest in a competitor or supplier, or other third party that
  does business with Dijo.
- Accepting any form of compensation (e.g., services, cash, cash equivalents such as gift cards) or gifts from a competitor or supplier, or any other third party that does business with Dijo without disclosure and prior approval from Dijo
- Having immediate family members who work for a competitor or supplier, or any other third party that does business with
   Dijo without prior disclosure and approval by Dijo
- Having a contractor or consulting role outside of Dijo with a Dijo competitor or supplier, or other third party that does business with or on behalf of Dijo, without disclosure and prior approval from Dijo.
- Engaging in personal business relationships with Dijo.

These examples apply to the employee, director or members of their *immediate* family.

"Immediate family member" includes spouse, parents, stepparents, children, stepchildren, siblings, stepsiblings, nephews, nieces, aunts, uncles, grandparents, grandchildren, in-laws and anyone who lives in your home or with whom you have a romantic relationship. In matters of conflict of interest, you are not responsible for learning about the actions of family members who do not live with you. In the case of family members who don't live in your home, you only have to worry about circumstances that you know about.

Application to Directors - Our conflict of interest policy applies differently to the Board of Directors. All members of the Board of

Directors and directors should ensure that actual or potential conflicts of interest that can reasonably be expected or may affect a director's independence and judgment in the performance of his or her duties are adequately disclosed and evaluated.

Once such actual or potential conflict of interest is identified, the director should immediately notify the Board of Directors of the situation. Notifications and disclosures should be made in a timely manner and in sufficient detail to allow full consideration of the relevant facts and circumstances to enable timely decision-making and resolution.

No employee or director shall accept compensation (in any form) for services rendered to the Company from any source other than the Company without the prior approval of the Chairman of the Board.

### **Expectations:**

- Avoid situations that may create or give the appearance of a conflict of interest.
- Disclose and seek pre-approval for any situation that may give rise to an actual or potential conflict of interest.
- Work with your supervisor and/or management to resolve any actual or potential conflicts of interest.

# Report if you see:

- Influencing a decision (for example, supplier selection) when they can have a stake in the outcome.
- Use of time, equipment or materials to perform official duties for another employer.
- Employment, promotion or direct supervision of an immediate family member .
- Providing or accepting gifts or entertainment if it may appear biased or influence a business decision.
- Targeting suppliers that are owned or managed by you or members of their immediate family.

### VII ASSET PROTECTION AND CONFIDENTIAL INFORMATION

The loss, theft and misuse of Company assets have a direct impact on the Company's operations and profitability. Our success depends on certain secret and confidential information that we all have a duty to protect. You are expected to protect and effectively use the Company's assets entrusted to you, and to avoid trespassing on assets belonging to others (such as competitors, or suppliers).

The term "assets" includes such things as:

- Physical assets, real estate, inventories and bequests.
- Financial assets, cash and cash equivalents.
- Electronic resources, data networks and computer systems and files, including the e-mail system and computers or notebooks assigned to individuals.
- Intellectual property, trade secrets and patents.
- Confidential and proprietary information, such as financial analyses, formulas and models, as well as product recipes and ingredients.

In general, Company assets should not be taken or used for personal reasons, except as expressly permitted (for example, in the case of Company vehicles assigned to individuals or other assigned assets). However, there may be situations in which infrequent and limited personal use is permitted. When such situations arise, use common sense, common sense, and discuss the problem with your supervisor if there are doubts about the appropriateness of the use. All Company assets in the hands of employees must be returned to the Company upon request and in all cases upon termination of employment.

Special attention should be paid to the electronic publication or transmission of Company data or information. Do not publish confidential or sensitive information on websites, blogs, social media, unapproved online co-ops, unapproved online file stores or similar places that could compromise the confidentiality of information or create a risk of theft or misuse. Even email or other seemingly "secure" electronic communication channels may not be appropriate for particularly sensitive or valuable information. If you have concerns about the secure transmission of confidential information, contact your IT department or CFO.

## **Expectations**

- Protect access to the company's facilities and follow the requirements for entering, exiting and naming badges.
- Use resources under our control, including raw materials and supplies, responsibly and protect them from theft, waste or misuse.
- Accurately report work time.
- Use only Company-authorized websites and approved collaboration methods to work with others online or on electronic

platforms.

- Consult with our technology experts to learn how to protect especially valuable or sensitive information that we need to send or share electronically.
- Follow security guidelines designed to protect employees, facilities, information and technology resources.
- Change our computer and network passwords in accordance with our policies and standards, including our global technology risk management policies.
- Monitor expense reports, vendor payments, account balances, accounting records, payroll data and budget variances for unusual activity.
- Identify and protect intellectual property from unauthorized disclosure or use.
- Respect valid patents, copyrighted materials, proprietary data and other protected intellectual property of others.
- Honor confidentiality and confidentiality agreements with others.

### Report if you see:

- Unauthorized entry into facilities or secure areas.
- Theft, waste or abuse of Company assets.
- Unauthorized use or disclosure of information protected by patent, copyright or trademark.
- Create unlicensed copies of software for personal or business use.
- Using company computers or networks to send emails or access websites inappropriate for the workplace.
- Use of confidential or proprietary information belonging to a former employer.
- Sharing intellectual property owned by one supplier with another supplier.
- Employees taking proprietary information when the Company quits.

Company records should be kept in accordance with the rules governing the creation, storage, preservation, retrieval and destruction of these records. Note that records can take various forms, such as:

- Paper documentation .
- Electronic records .
- Photos.
- Drawings.
- Videos.
- Photos.

Document retention orders and retention policies must be fully complied with.

# **Expectations:**

- Storing or discarding documents according to document retention rules .
- Store documents in a secure environment.
- When rejecting documents in accordance with our policies, make sure that documents containing confidential or identifiable information are completely shredded or destroyed.
- If the withholding order was issued in connection with a judicial proceeding or investigation, make sure it is fully complied with by the time the withholding order is issued.

# Report if you see:

- Destroying or altering a document that is subject to a document preservation subpoena in connection with actual or potential litigation.
- Storing old files or documents after the retention period has expired.
- Keeping records where they do not belong or may not be safe.

### V. OUR COMMITMENT TO OUR EMPLOYEES

#### **Our commitment**

Dijo Fun&Food is committed to ensuring that our employees are treated with respect and dignity, which includes a workplace free from discrimination, harassment, intimidation, illegal substances and unsafe conditions.

## **Equality of opportunity**

Attracting and retaining the best people and keeping a diverse group of talent go hand in hand. Dijo Fun& Food recruits, hires, compensates, develops, promotes, disciplines and fires individuals on the basis of merit and without regard to race, color, creed, religion, gender (including pregnancy, childbirth and medical conditions related to pregnancy, childbirth and breastfeeding), age, mental or physical disability, protected illness, physical handicap, sexual orientation, gender, national origin, , social or ethnic origin, military or veteran status, marital status, citizenship status, political affiliation or other legally protected status.

### **Expectations:**

- Make hiring decisions based on a person's skills and merits, not personal qualities that are not job-related.
- Check the possibility of providing facilities for people with disabilities.
- Appreciate diversity, inclusion and teamwork.
- Recognize and reward employees based on performance.
- Inspire greatness and celebrate our collective achievements.

## Report if you see:

- Judging people based on their appearance, ethnicity, nationality or other factors unrelated to their skills or the task at hand.
- Discriminating against people for improper or illegal reasons in employment or labor-related decisions.

## Mutual respect and dignity

Mutual respect and dignity should always be shown in your interactions with colleagues. You should be wary of any form of behavior that threatens trust, the quality of the work environment or the integrity of decision-making. Dijo prohibits behavior that harasses, disrupts or in any way creates or contributes to an intimidating, hostile or offensive work environment.

# **Expectations**:

- Treat others as you want to be treated yourself.
- Recognize and respect people with views that may differ from yours.
- Work on disagreements or conflicts in a fair, civilized and constructive manner.
- Maintain a professional work atmosphere.

## Report if you see:

- Unwanted or inappropriate sexual propositions or harassment.
- Inappropriate jokes, offensive comments, offensive e-mails or indecent graphics or photos.
- Intimidation, threats, bullying, favoritism, humiliation of others, verbal or physical rage.

### Fair employment practices

Fair employment practices are not just about acting in accordance with applicable labor laws. They help us attract and retain the best talent for our employees. Dijo is committed to complying with all laws regarding freedom of association, wages, working hours and benefits, anti-discrimination, and laws prohibiting forced, compulsory and child labor.

### **Expectations:**

- Verify employees' employment eligibility.
- Accurately compensate employees for regular and overtime hours in accordance with applicable laws and in a timely manner.
- Maintain work weeks, rest periods, days off and benefits in accordance with applicable laws.

### Report if you see:

Employing people with false or undocumented employment eligibility records.

- Determining work weeks that exceed applicable legal restrictions.
- Failing to pay employees for all hours worked or making illegal or unauthorized deductions from wages or benefits.
- It operates with a broken time clock or does not accurately record all hours worked.
- Denying legally required vacations, rest periods or days off.
- The use of illegal child labor or forced labor (slave, contract, or forced prison workers).
- Possession of an original employee ID card, passport or work permit without written permission.
- Including recruitment fees or termination penalties in employment contracts.
- Restricting access to sanitary toilets, drinking water or exits from buildings.

## Health and safety of employees

Dijo is committed to providing a safe and healthy work environment for all employees. Injuries and illnesses in the workplace are often preventable. No activity is so important that it cannot be done safely, and we do not compromise individual safety in everything we do. This means that we are involved in designing, building, maintaining and operating facilities that protect our employees. Threats, intimidation, physical intimidation and violence have no place at Dijo! and will not be tolerated.

We comply with all applicable safety laws, regulations and policies and encourage people around you to do the same.

- Ensure that proper routine maintenance of buildings, machinery and equipment is carried out.
- Maintain first aid resources that are adequate to respond to common workplace injuries.
- Immediately notify management of any accident, injury, illness, dangerous condition or threat of violence.

# Report if you see:

Hazardous activities or conditions such as:

- Turning off or removing controls or guards of equipment and machinery.
- Blocked fire or emergency exits.
- Exposed or unsafe wiring.
- Staff operating equipment (e.g., cooking equipment) that does not conform to company standards.
- Work performed on electrical or powered equipment without following safety procedures.
- Exposure to infectious diseases.
- Inadequate ventilation, lighting or temperature control.
- Physical threats, intimidation, bullying, or violence.

#### Substance abuse

A safe and healthy work environment means that employees do not work if they are impaired or distracted by drugs, alcohol or other substances.

#### In particular:

- You may not possess or use illegal drugs
- You may not work under the influence of alcohol, drugs or other substances that could prevent you from performing your job safely and effectively.
- In addition, unlawful acts by employees involving the use of illegal drugs, alcohol or other substances outside of work may affect Dijo and may result in disciplinary action.

Employees who suffer from a substance abuse problem are encouraged to recognize the problem and seek help. They can do so by contacting a health care provider as part of the medical packages provided to employees.

### **Expectations:**

- Work without being impaired by drugs or alcohol.
- Do not bring drugs or drug-related paraphernalia to our workplaces.
- Seek help if you recognize that you have a drug or alcohol problem.

### Report if you see:

Employees working under the influence of alcohol or drugs.

Possession, use or distribution of illegal drugs or other substances on Company premises.

## **Privacy and confidentiality**

Dijo believes in respecting the confidentiality of our employees' and customers' personal information as required by the Data Protection Law. Personal information is information that can be used (alone or in combination with other information) to uniquely identify an individual. Access to personal data should be limited to Company personnel who have the appropriate authorization and a clear business need for the information. Employees who have access to personal information must use it appropriately and treat it as confidential and comply with all applicable laws and policies.

Never provide personal information about employees requested by anyone outside of Dijo without proper authorization.

Mobile devices, including your personal device (if you use it to access email or Dijo data, should not be considered private. Records of electronic communications may be created and used for various reasons and may be subject to monitoring or auditing at any time and without notice. Please keep this in mind and exercise caution when using the Company's electronic devices.

## **Expectations:**

- Collect, process and use sensitive personal data only for legitimate purposes.
- Use anonymous, partial or substitute data when possible (e.g., company-issued identification numbers instead of social security numbers).
- Use encrypted files and devices to store and transmit personal data, to prevent unauthorized access.

### Report if you see:

- Leaving data storage devices or confidential documents in unsecured locations.
- Sharing personal data with third parties, such as vendors or suppliers, who are not specifically authorized to hold such data or who do not have appropriate safeguards or restrictions on its use.
- Transfer of personal data between countries without compliance with applicable legal requirements.

#### **VIII ANTI-CORRUPTION**

Corruption and bribery are very serious matters and are often violations of the law. Corruption is harmful to business because it stifles investment, undermines economic growth and reduces market opportunities. When government is for sale, it destroys public trust and denies people and businesses the benefits of open markets and fair competition.

Dijo is committed to preventing bribes in its operations and avoiding the impression that it may offer bribes to obtain business benefits. Accordingly, employees are strictly prohibited from giving anything of value to government officials for the purpose of improperly obtaining or retaining business, influencing the performance of official duties, or for any other improper purpose or business advantage.

Dijo also prohibits private corruption, so the rules apply not only to our interactions with government officials, but also to our interactions with commercial customers and suppliers.

#### **Expectations:**

- Do not pay bribes. Before giving a gift or providing entertainment to a representative of a company with which Dijo does or may do business or reimbursing a representative's travel expenses, make sure you understand and comply with applicable legal requirements and our policies.
- Keep full and accurate records of the purpose and cost of interactions with government officials for example, improperly recording otherwise lawful expenses in the Company's books may also violate anti-corruption laws.
- Do not give gratuities or other payment to government officials to expedite routine administrative activities.
- Ensure that due diligence is performed on agents and third parties that interact with government officials.

#### Report if you see:

Offer improper payment (in cash or anything else of value) to the

 $government\ official,\ representative\ of\ another\ company\ or\ any\ related\ person\ or\ entity.$ 

- Establish an off-book fund for any purpose.
- Inaccurate descriptions of any transactions involving a government official, including permitted transactions

The following situations may give rise to corruption risks.

- Background information on current or potential third-party representatives, agents or suppliers indicates:
  - allegations of improper business practices.
  - A reputation for paying or demanding bribes.
  - o A family or other relationship that could improperly influence the decision of a client or government official.
- Any request to receive a commission or personal fee prior to the granting of a permit or zoning change.
- Any suggestion to direct business to a particular representative, partner or supplier because of a "special relationship."
- Any request to make payment in the country or to a party unrelated to the transaction.
- Donations to charitable organizations run or supported by government officials or their families.
- It is proposed to acquire or lease properties owned by government officials or their families.

#### IX. RESOURCES FOR MAKING THE RIGHT CHOICES

# How to recognize ethical dilemmas?

Before making a decision or executing a directive, consider its ethical dimension, asking yourself:

- Is it right?
- Who might be affected by this decision?
- Would I want someone else to make the same decision if our roles were reversed?
- Does it comply with the letter and spirit of the law?
- Would I have made a different choice if I had focused on long-term and short-term gains?
- Is my judgment free of conflict of interest, or do I have a personal stake in the outcome that makes me less objective?
- Will additional advice or knowledge help?
- Would I feel comfortable explaining my decision to my family or a skeptical reporter if it were made public?

#### When to seek help?

Always seek advice when the right course of action is unclear. For example, when:

- Not sure how to apply our policies to your specific situation.
- The relevant regulations or requirements are complex and difficult to interpret.
- You have limited experience in dealing with the topic.
- Different opinions make the right answer unclear.
- The proposed action or decision simply makes you uncomfortable.
- You have or suspect that you may have a conflict of interest.

You are also expected to report any potential or suspected violations of laws, regulations or policies, including those set forth in this Code of Conduct. This includes situations in which you know or suspect that any of the following parties have been or are about to be involved in illegal or unethical activities:

- Employees or managers.
- Agents or third parties acting on behalf of Dijo.
- Suppliers or service providers.

There are many options available to help make sure your concerns are addressed appropriately. Your immediate supervisor or manager is usually the best place to start.

You can also raise guestions or concerns, as described below:

Sample topics	Organizational cell
Employment, discrimination, harassment, favoritism, wages, hours, interpersonal disputes	
Workplace safety, hazardous materials, protective equipment, machine operation	HEALTH AND SAFETY SERVICES
Product quality, consumer protection	FOOD SAFETY AND QUALITY DEPARTMENT ( FSQ)
Imports, exports, international sanctions	MANAGEMENT
Financial reporting, accounting, tax reporting, books and records	FINANCE DEPARTMENT/ CFO/ MANAGEMENT
document retention	MANAGEMENT
Code of Conduct requirements and interpretations, including conflicts of interest, fraud, corruption, collusion, gifts and entertainment	MANAGEMENT

If you are not sure who to contact or cannot resolve the issue through management or other resources listed above, you can discuss the situation with your supervisor/HR department or the Board of Directors

## Non-retaliation policy

As an employee, you have a duty to report potential violations of this Code. An employee who seeks advice, raises concerns or reports misconduct in good faith is doing the right thing. Therefore, we have policies and procedures in place to prevent retaliation against anyone who raises a concern or participates in an investigation in good faith, even if the allegation is ultimately not substantiated.

Anyone, regardless of position or seniority, found to have engaged in retaliation against a person who has raised compliance or ethics concerns in good faith will be subject to disciplinary action, which may include termination. If you believe you have been the victim of retaliation, contact the Ethics Officer for assistance.

Remember that our policy against retaliation does not exempt you from discipline if you have engaged in misconduct. However, we encourage managers and employees to self-report violations and, depending on the specific circumstances, may consider self-reporting as a mitigating factor in assessing the nature of the disciplinary measures to be taken.