DANTEM Group Code of Ethics



Revision number: 2023-11-02

This Code of Ethics is binding for all workers (i.e., employees and other collaborators) and suppliers of all companies of the DANTEM Group, i.e., all Czech and foreign companies directly or indirectly owned by DANTEM s.r.o., ID No.: 26421232, with registered office at Patočkova 712/3, 169 00 Prague 6, Czech Republic.

Introduction

We greatly appreciate the long-term trust of our customers, partners, and workers. We regard trust—rooted in truth and honesty—as the cornerstone of all our relationships.

Impartiality and independence

The aim of our services, especially inventory services, is to provide as true a picture of reality as possible. We are committed to continuously working to minimize any potential distortion of the data we collect. We are impartial and independent in our collection and processing so that the resulting data is as accurate a description of reality as possible.

Adherence to laws and regulations

We agree to abide by all applicable laws and regulations of all countries in which we provide services, as well as all internal regulations of our companies, without exception. We consider strict compliance with the laws in the following areas to be particularly important:

- Corruption, bribery, unfair competition, money laundering, conflict of interest
- Workers' remuneration, minimum wage, discrimination
- Occupational health and safety
- Slavery, forced labor, child labor
- Personal data protection and privacy
- Environmental protection
- Sexual harassment

Accepting donations

Under no circumstances may any DANTEM Group workers accept gifts from client representatives, suppliers, or other individuals in connection with the provision of services by DANTEM Group companies. This applies in particular to workers providing inventory services, inventory managers and other workers working on individual Group contracts.

An exception is made for executives of individual companies (directors), who may accept a donation in certain cases, but only if all of the following conditions are met:

- The value and nature of the gift corresponds to normal commercial practices,
- the gift is non-monetary and of negligible value,
- the Group's management is immediately informed of the acceptance of the donation,
- the acceptance of the gift shall not be conditional on the provision of any consideration or benefit; if such a proposal is made, or such a possibility is mentioned or implied by any of the participants, the management of the Group shall be informed immediately; and
- the acceptance of the gift does not give the impression of corruption or other illegal or unethical behavior.

If the gift does not meet the above conditions, the worker is obliged to refuse the gift with reference to the Code of Ethics.

Providing donations

DANTEM Group workers may only make donations if all the following conditions are met:

- The gift is made to a representative of the client or business partner,
- it is a promotional item, a treat or other form of gift customary in business,
- the value of the gift is appropriate to the situation,
- donation is made openly and with the knowledge and consent of the management of the DANTEM Group,
- the making of a gift shall not be conditional upon the provision of any consideration or benefit and no such possibility is expressly or impliedly mentioned or suggested by any participant; and
- the donation does not give the impression of corruption or other illegal or unethical behavior.

Prevention of corruption

We do not tolerate any corrupt behavior, not even attempts to do so. All workers and other associates of the DANTEM Group are obliged to immediately report any corrupt conduct, including attempts to do so, such as giving, accepting, or offering bribes or asking for bribes.

We define bribes broadly to include money, tangible and intangible items, such as services, special rights, discounts, benefits, or any other advantages provided directly or indirectly. A request for a bribe includes a request for a gift, even if the gift is made to a third party.

Conflict of interests

Conflicts of interest are situations in which the personal interests of a DANTEM Group worker interfere or may interfere in any way with the interests of DANTEM Group, its clients or business partners, or in any way influence the decisions of the worker or DANTEM Group. This includes situations where the worker works both for a DANTEM Group company and for one of its clients, suppliers, or competitors.

Each worker is obligated to act in a manner that avoids conflicts of interest, as well as situations in which he or she could be exposed to a conflict of interest and thus obtain an undue advantage or benefit for himself or herself or for someone else to the detriment of the DANTEM Group, its clients or business partners.

In the event of a conflict of interest or the possibility thereof, the worker is obliged to immediately inform his/her immediate superior or the management of the DANTEM Group.

Confidentiality and data protection

It is the duty of all workers of the DANTEM Group to maintain strict confidentiality of all facts that they have learned in connection with the performance of their work or the provision of services. This obligation of confidentiality extends to all third parties.

The worker is authorized to disclose information to third parties only under specific conditions, e.g., if the DANTEM Group authorizes him/her to do so in writing or if required by law.

It is the duty of all workers of the DANTEM Group to protect the aforementioned information so that it is not disclosed to unauthorized persons, modified, or destroyed.

We place special emphasis on the confidentiality of:

- all matters relating to clients of the DANTEM Group, their assets and inventories, their internal affairs, and other non-public facts,
- procedures and methods used by the DANTEM Group, its software and hardware, and all business affairs of the DANTEM Group, its business partners and other non-public information; and
- personal data of workers of the DANTEM Group and its clients or any other persons.

Workplace relationships

We always strive for a welcoming and positive work culture. No aggressive behavior or sexual harassment of any kind, even if it is just verbal expressions or gestures, has any place in the DANTEM Group.

We treat all colleagues and representatives of clients and suppliers with the utmost respect and tolerance, regardless of their age, gender, sexual orientation, nationality, or beliefs.

We maintain professional composure in the workplace, refraining from intense emotional displays toward others, including partners or family members.

We always resolve any conflicts with discretion and seek understanding first and foremost. If we are unable to resolve a conflict ourselves, we immediately contact our supervisor.

The environment

We take care to protect the environment and always choose procedures that put as little stress on it as possible. We save energy and consumables, print only where it is practical and only in the quantities required for the purpose. We are committed to actively seeking more environmentally friendly practices, such as using electronic documents instead of paper.

Violation of the Code of Ethics

We believe that behaving in accordance with this Code of Ethics is essential to the successful operation of our company. The DANTEM Group is harmed by any knowing or unknowing violation of the described principles.

Any suspicion of legal or ethical violations must be reported immediately via email to complaints@dantem.com, and the DANTEM Group's management will address all complaints promptly.