

# DIBBER'S EXTERNAL CODE OF CONDUCT

for partners, vendors, suppliers  
and other relations

Dibber have the vision we make the most important resources in the world thrive. In this vision lie that all children, parents, employees and everyone else be able to grow and live together in an ethical and conscientious world. For this and other purposes Dibber seek ethical and other standards and principles are met in all our relations, existing and new, direct and indirect, and have adopted this External Code of Conduct.

## Content, objective and application

Our External Code of Conduct sets out (i) ethical and other standards and principles for behaviour in business and otherwise that are generally accepted as well as (ii) the implications Dibber attach to these for our relations. The objective is to ensure all our relations can familiarize themselves with these in detail in order to promote the standards and principles. Our External Code of Conduct applies to all individuals, companies, public bodies and other entities that have a contractual or other relationship with Dibber, commercial or non-commercial ("Relations", each a "Relation"), and all Relations are, as applicable, responsible to ensure this External Code of Conduct is observed by their directors, officers, other employees and representatives, and, on a reasonable best-efforts basis, their own relations and their directors, officers, other employees and representatives and so on and so forth.

## Generally accepted standards and principles

### General

All Relations shall comply with applicable laws and regulations and abide by all other generally accepted ethical and other standards and principles, such as those provided in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights and the relevant additional standards, the most important of which are highlighted hereunder directly and by reference:

### Human rights

All Relations shall respect and support human rights.

### Principles and rights at work

**All Relations shall respect and support the fundamental principles and rights for employment and occupation. This includes:**

(i) All Relations shall respect and uphold employees' right to freedom of association, including trade unions and similar external representative bodies, and ensure employees' rights to collective bargaining. (ii) All Relations shall work continuously, systematically and preventively to have a safe, healthy and secure work environment from a physical, mental, and social point of view. (iii) All Relations shall treat employees fairly, equally, and with respect for the equal value of all human beings. (iv) All Relations shall promote equality and diversity and actively counteract discrimination in employment and occupation. Discrimination, regardless of reason, must not occur in any way in recruitment, salary setting, promotion, training, or termination or other situations, neither must harassment, bullying, threats, oppression, intimidation or other physical or mental abusive behaviour. (v) All Relations shall not make use of, take part in or accept in any other way human trafficking or involuntary, bonded or forced labour of any kind or child labour.

### **Confidentiality, privacy of personal data and data protection**

All Relations shall protect confidential information in accordance with the basis for such confidentiality. All Relations shall protect the privacy of personal data as determined by applicable laws and regulations and other legal bases, including ensuring that (i) the processing of personal data is fair and transparent, (ii) the collection of personal data is made for explicit and legitimate purposes only and the use of which made accordingly, (iii) the collection of personal data is relevant, adequate and limited to what is necessary in relation to the purpose of collection, (iv) the personal data is not stored longer than necessary for the related purposes or basis, (v) all personal data is kept confidential, stored in a secure way, under appropriate technical and organizational measures for protecting them (vi) personal data is shared only when lawful (vii) data subjects' rights, including the right of access, erasure, restriction, objection and rectification of personal data, are complied with.

### **Corruption and hospitality and gifts**

Relations must not make any provision, offering or acceptance of bribes of any variety, including illegal trading in influence and facilitation payments, to any person, whether private or public, either directly or through any third party. Relations must not make gifts or hospitality where giving or accepting them could influence business decisions, violate any local laws or the policies of the recipient principal or cause others to perceive such influence or violation. All hospitality and gifts must be transparent.

### **Conflicts of interest**

All Relations shall ensure relationships and similar are not used for personal gain.

### **Money laundering, terror financing, sanctions and export controls**

Relations shall refrain from condoning or supporting money laundering and terror and terror financing in any form and abide by applicable sanctions and export controls.

### **Unfair competition and unfair trade practices**

Relations shall refrain from unfair competition and other unfair trade practices, such as price fixing, forming cartels, abusing market positions and conducting deceptive trade practices.

### **Environment and sustainability**

All Relations shall work to exceed minimum requirements for environment and sustainability as laid down by applicable laws and regulations and promote the UN's Sustainable Development Goals.

### **Implications**

Dibber reserve the right to monitor and investigate breach or suspicion of breach of this External Code of Conduct. All Relations shall report any breach or suspected breach of this External Code of Conduct to Dibber without delay. Anyone can anonymously report breaches or suspicions of breach to Dibber through Dibber's whistleblowing online solution, which can be accessed at [www.dibber.com](http://www.dibber.com). If breach is verified, Dibber, will seek to remedy the situation in collaboration with the relevant Relation, typically through dialogue and learning and reciprocal exchange of knowledge and other assistance. If breach is not remedied within a reasonable time, the relationship may be terminated.

