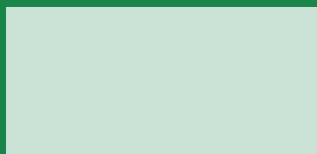




DELTA TRANS



CODE OF ETHICS

DELTA TRANS GROUP

INTRODUCTION

1. The term Delta Trans Company Group shall be understood as the following companies:

- Delta Trans Transporte sp. z o.o. with its registered office in Świętochłowice, ul. Chorzowska 134B,
- Delta Trans Logistik sp. z o.o. with its registered office in Świętochłowice, ul. Chorzowska 118 – 120.

2. The aim of this Code of Ethics is:

- obligation of employees/associates of Company Group to ethical conduct and ethical behavior in business
- to create a proper work culture within the Company Group and between the Company Group and its environment

3. This Code of Ethics is a commitment of the company and its employees/associates to the highest ethical standards

4. We comply with applicable laws in the countries in which we conduct our business, as well as international regulations affecting our activities.

5. At DT Group, we operate according to the highest human rights standards. We respect and adhere to the UN Guiding Principles on Business and Human Rights and the Universal Declaration of Human Rights.





THE MOST IMPORTANT STANDARDS OF CONDUCT:

1. EMPLOYMENT

- 1.1** We inform all employees clearly in writing about terms of employment.
- 1.2** We do not use child labour or forced labour.
- 1.3** We respect employees' freedom of association and their right to representation in accordance with the Labour Code.

2. WORK TIME

- 2.1** We guarantee work and leisure time as required by law
- 2.2** We do not apply mandatory overtime

3. REMUNERATION

- 3.1** We guarantee fair wages as required by law.
- 3.2** We inform all employees clearly in writing about remuneration-related terms of employment.
- 3.3** We apply deductions from payments only in accordance with the Labour Code.
- 3.4** We do not use deductions from payments to discipline our employees.

4. OCCUPATIONAL HEALTH AND SAFETY

4.1 Our goal is to ensure safe and hygienic work conditions to all employees and co-workers (permanent and temporary), while complying with all applicable regulations.

4.2 We take actions to recognize and prevent health and safety risks:

- employees (permanent and temporary),
- co-workers
- employees of our clients
- employees (permanent and temporary) of our sub-suppliers,
- people living near our workplace.

4.3 We monitor dangerous occurrences - we analyze them and take corrective actions to prevent them in the future.

4.4 We employ a person in charge of OHS/fire safety compliance.

4.5 We organise regular OHS/fire safety training courses for all employees.

4.6 The consumption of alcohol and drug use are strictly prohibited for all employees who are on duty.

4.7 Delta Trans Group has a separate policy of OHS/fire safety.



5. QUALITY OF SERVICES

5.1. DT Group has a separate Quality and Environmental Management Policy (Integrated Management System Policy).

5.2. We employ persons responsible for:

• the regulatory compliance of the DT Group of companies,

• meeting the requirements of the Integrated Management System by the DT Group of companies.

5.3. We organise systematic training in quality management.

5.4. We carry out checks on the delivery of our services/products to ensure that the product meets customer's requirements.

5.5. We ensure traceability of raw materials and other materials necessary for the supply of products and services.

5.6. At least once a year, we set specific, measurable quality objectives and targets.

5.7. All people working in the company are committed to quality issues.

6. ENVIRONMENTAL PROTECTION

6.1 The DT Group of companies is constantly striving to reduce the level of negative environmental impact by focusing primarily on:

- protection of: water, land, air, forests, biodiversity and animal rights,
- reducing emissions of: greenhouse gases, noise and waste.
- We achieve our objectives in particular by:
 - complying with legal requirements in the scope of environmental protection,
 - investing in renewable energy sources,
 - not taking action to deforest land,
 - rational use of materials, water, gas and electricity,
 - continuous monitoring of material, water, gas and electricity consumption,
 - continuous monitoring of noise levels at workplaces,
 - optimisation of waste management through waste separation and recovery,
 - rational and responsible management of the chemicals used,
 - continuous innovation, leading to the prevention of: accidents, environmental pollution, including air pollution, and reduced water consumption,
 - adherence to established patterns of behaviour and creating new patterns that minimise the risk of environmental problems,
 - careful selection of suppliers and their monitoring,
 - an effective staff training system,
 - preventing emergency situations,
 - continuous improvement in terms of safety, quality and environmental protection.

6.3 At least once a year, we set specific, measurable environmental objectives and targets.

6.4 All people working in the company are committed to environmental protection



7. EQUAL TREATMENT/MUTUAL RESPECT/NON-DISCRIMINATION

7.1. We are committed to a policy of equal treatment, we act against all forms of discrimination and condemn any behaviour that lacks respect for the other person.

7.2. Discrimination of any kind is unacceptable.

7.3. Discriminatory criteria are, in particular:

- a) gender,
- b) age,
- c) disability – a mental, physical or psychological condition which permanently or periodically hinders, restricts or prevents, e.g., the ability to perform work,
- d) race, nationality, ethnicity – skin colour, national origin, membership of a national minority,
- e) religion and belief – a particular world-view, membership of a particular religious group,
- f) political beliefs – membership of a particular political party, specific 'political sympathies',
- g) trade union membership – membership of a specific trade union organisation,
- h) sexual orientation, e.g. homosexual orientation,
- i) employment for a fixed or indefinite period,
- j) full-time or part-time employment.

7.4. We prohibit:

- the use of various forms of intimidation against employees,
- harassment and humiliation of employees.

7.5. We do not condone any form of discrimination and unequal treatment with regard to staff recruitment, access to training, promotions, salaries, dismissal or retirement.

7.6. It is unacceptable to discriminate against women on the basis of gender or parenthood. We are wary of unequal pay for equal work done, of women being overlooked for promotion or benefits, or not tipping them for skills training.

7.7 Detailed rules on equal treatment in employment based on the Labour Code are annexed to the current Staff Regulations.



8. ANTI-CORRUPTION MEASURES

8.1 Corruption is understood as any act or omission to act, as well as a promise to do so in order to obtain a given, promised or alleged benefit, both tangible or intangible, directly or indirectly, unlawfully or against the principles of ethics.

8.2 Corrupt behavior takes place when a person who wants to achieve a goal for himself or the entity or person represented by him promises, proposes or gives a financial benefit (i.e. a benefit whose value can be expressed in money, understood both as an increase in the value of assets and a reduction in liabilities burdening the assets) or personal (understood as a non-pecuniary benefit improving the situation of a particular person) to a person who performs public functions or performs important functions in economic turnover in order to achieve this goal. It is not important whether such activities are undertaken in person or with the help of intermediaries.

8.3 The Delta Trans Group has a zero tolerance policy against corruption in all aspects of the company's business activities. No tolerance applies to all forms of corruption, whether it occurs in the public or private sector and whether or not it benefits or could benefit the Companies, their contractors or business partners.

8.4 It is forbidden for employees, co-workers and representatives of the Delta Trans Group, both in internal and external relations, to take any of the following actions, regardless of whether they are undertaken directly or through other persons:

- bribery
- coercion or inducement,
- paid protection,
- legalizing the proceeds of corruption

8.5 Employees, co-workers and representatives of the Delta Trans Group cannot offer, give, promise, demand or accept any material or personal benefits:

- that could be perceived as illegal, unethical or inappropriate,
- whose purpose is to influence the terms of the transaction.

8.6 Employees, co-workers, representatives of the Delta Trans Group are obliged to protect the reputation and interests of the DT Group of companies, and in particular they must:

- always be cautious of the risk of corruption,
- be careful in dealing with third parties on behalf of the Delta Trans Group,
- prevent, detect and report any corruption behavior

8.7 We always do the right when dealing with customers, suppliers and consumers, treating them fairly and with respect.

8.8 We use the services of Suppliers who do not violate ethical standards by paying bribes or providing similar benefits contrary to the law.



9. PROCEDURE CONCERNING GIFTS


9.1 We approve only of those gifts that are freely offered to an employee by an entity cooperating with the Delta Trans Group and which meet the following requirements:

- the benefit has no influence on the way the matter is handled,
- the benefit does not require reciprocation,
- the employee does not have to hide it,
- the benefit is an advertising, promotional (e.g. a calendar) or other item whose value does not exceed PLN 100.

8.2 We prohibit:

- giving or accepting money as a gift,
- giving gifts of any value to government employees or representatives,
- giving or accepting excessively expensive gifts or too often,
- giving any gifts in thanks to government employees,
- giving or accepting gifts that could influence business decisions,
- giving or accepting gifts which depend on the extent of business done,
- offering a gift which to your knowledge would violate the rules of accepting gifts at the recipient's company,
- offering or accepting offered participation in an entertainment event unrelated to the company's activities, e.g. a musical concert or a match

8.3 We always make sure that a given gift is compliant with rules adopted at the Delta Trans Group and if it violates the adopted rules, we refuse to accept it and we inform the giver about it.





10. FINANCING OF POLITICAL ACTIVITY

Delta Trans Group does not finance or otherwise support political parties or their members, including political candidates, their election campaigns or political events, or any political organizations or movements.

11. PAYMENTS TO THIRD PARTIES BY AGENTS/ BROKERS

The Delta Trans Group, employees, co-workers, representatives are prohibited from making payments to third parties through agents when there is a suspicion that part or all of such payment will be used as a bribe.

12. FACILITATING PAYMENTS

We do not make facilitating payments, i.e. unofficial payments offered to obtain or bring forward the routine activities of state / local government bodies.

13. ACCOUNTING DOCUMENTATION AND RECORDS

Each of the Companies keeps accounting books that reflect all transactions and property management in a sufficiently detailed and accurate manner.

The use of false documents as well as the introduction of inappropriate, ambiguous or misleading accounting entries, as well as the use of any other accounting procedures, techniques or solutions that would conceal illegal payments is strictly prohibited.



14. AUDITS AND CONTROLS

Each of the Companies regularly carries out audits covering financial and business activities, and controls the completeness and accuracy of recording all activities in books and registers on an ongoing basis, as well as compliance with legislative requirements and internal normative documents, including the principles and requirements set out in the content of this Code.

15. CONFLICT OF INTEREST

15.1 We forbid the use of employment at the Delta Trans Group to obtain unauthorised personal benefits.

15.2 We forbid our employees to perform, without the Delta Trans Group's prior consent, any competitive professional activity, including operating a business, or to participate in transactions for other entities, in particular for competition, or any other third parties whose interests are, or could be, in conflict with the Delta Trans Group's interests.

15.3 Employees have a constant obligation to inform the company about any conflicts of interest which may occur between their employment at Delta Trans and a possible relationship with a Supplier.

15.4 We require Employees to avoid creating potential conflicts of interest and to identify and report any conflicts they encounter.

15.5 We comply with antitrust laws. We do not tolerate pricing arrangements and agreements, market partitioning and any other forms of unfair competition restriction.

15.6 We prohibit employees from participating in agreements with contractors, the purpose or effect of which is to fix prices, influence the tenders, divide markets or customers, limit production or boycott a customer or supplier.



16. PROTECTION AND MISUSE OF THE COMPANY'S EQUIPMENT, ASSETS AND TIME

16.1 We prohibit the appropriation of the company's property for personal use or resale.

16.2 The Delta Trans Group's identification marks may be used only for business purposes.

16.3 We require all employees to protect the Delta Trans Group's and customers' property against theft, damage, misuse and destruction.

17. INTELLECTUAL PROPERTY PROTECTION

17.1 All employees are obliged to ensure proper protection of intellectual property of DT Group and customers / suppliers against access by unauthorized persons.

18. RELIABLE BUSINESS PARTNER

18.1 Our goal is to build long-term relationships with our suppliers and customers, based on fair and honest principles.

18.2 We pursue our business objectives with respect for the rights and welfare of all our customers.

18.3 We are guided by responsibility and trust in our partnership with customers.

18.4 We make every effort to ensure responsible sourcing of materials and raw materials. Responsible sourcing and extraction of raw materials also includes consideration of environmental protection, including chemical management, as well as respect for human rights.

18.5 We avoid purchasing and using materials that have been acquired illegally or through ethically reprehensible or unreasonable activities.

18.6 We require that our Suppliers develop, implement and apply effective methods and procedures to detect and minimise the risk of counterfeit parts and materials entering our supply chain.

If such an event is detected, we expect Suppliers to implement effective procedures to identify the product and notify the recipients of the counterfeit product.



18.7 We comply with the provisions of the Public Procurement Law.



19. EXPORT / IMPORT CONTROLS AND TRADE RESTRICTIONS

19.1 We undertake to comply with national / international laws governing the import and export of goods, services and information, and to comply with applicable embargoes and sanctions

19.2 We undertake to comply with the regulations on counteracting money laundering and financing of terrorism.

19. PERSONAL DATA PROTECTION

19.1 We process personal data lawfully, diligently and transparently, ensuring its adequate security, including protection against unauthorised or unlawful processing and accidental loss, destruction or damage, using appropriate technical and organisational means.

19.2 No actions against Employees' privacy are allowed.

19.3 Access to personal data is granted only to persons whose position and scope of duties require it. These persons are duly authorized to access as above.

20. INFORMATION SECURITY - INFORMATION SECURITY MANAGEMENT

20.1. We are aware of the importance of the security of the information processed in the Company and create conditions to ensure its security, including by securing financial resources to protect it, as well as employing qualified personnel.

20.2. We undertake to comply with legal and contractual requirements relating to information security, particularly with regard to personal data protection regulations and information constituting company secrets.

20.3. Information Security Management is implemented through the Information Security Management System (ISMS).

20.4. Information security is implemented through the following continuous activities:

- monitoring the state of security (technical and organisational equipment, formal and legal regulations) and the related risks;
- staff training (ensuring up-to-date knowledge);
- making employees aware of the importance of their involvement in the information security policy;
- informing employees of the consequences of failing to take due care of information security or information security breaches;
- reporting of information security incidents.

20.5. Information security is the responsibility of each person in the position/performing function entrusted to them. Information security assurance is overseen by managers of the organisational units at all levels of management.



21. PERSONAL DATA PROTECTION

21.1. We process personal data lawfully, diligently and transparently, ensuring its adequate security, including protection against unauthorised or unlawful processing and accidental loss, destruction or damage, using appropriate technical and organisational means.

21.2. No actions against Employees' privacy are allowed.

21.3. Access to personal data is granted only to persons whose position and scope of duties require it. These persons are duly authorized to access as above.

22. REPORTING VIOLATIONS

22.1 Any violation of the rules of the Code of Ethics must be reported:

1) by e-mail to the address:

- if the non-conformities concern Delta Trans Transporte sp.z o.o
nieprawidlowosciT@deltatrans.pl
- if the non-conformities concern Delta Trans Logistik sp. z o.o
nieprawidlowosciL@deltatrans.pl

2) by phone - Organizational and legal department - 32 77 27 613

3) by letter to the company's registered office address.

22.2. Notifications as above. can be made anonymously using, for example, an external e-mail address.

22.3. Reporting an ethics violation does not have negative consequences for the reporting person (retaliation is prohibited).

22.4. During the investigation of violations, we ensure confidentiality and do not take disciplinary action against a person accused of violating the procedures until the investigation is completed.

22.5. Possible violations:

a) in the field of labor law, occupational health and safety, human rights will be considered by a Team made up of:

- representative of the organizational and legal department,
- representative of the OHS department,
- representative of the personnel department.

b) related to environmental protection will be examined by a team of:

- representative of the organisational and legal department,
- environmental protection specialist.

c) related to other matters will be examined by a team of:

- representative of the organisational and legal department,
- representative appointed by the Company's Management Board.

22.6. In case of doubts regarding the conduct in a specific situation or suspected violation of the Code of Ethics contact your supervisor and / or the organizational and legal department.

