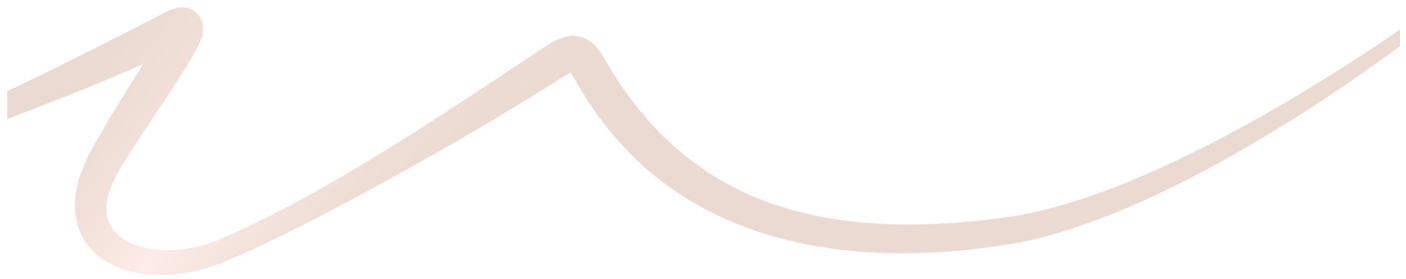


Group Code of Conduct

Group Code of Conduct



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Group Code of Conduct

Group Code of Conduct

Table of Contents

1.	Scope.....	1
2.	Roles and Responsibilities.....	2
3.	Values and Code of Conduct Principles in D-Marin	2
3.1	Honesty, Righteousness and Transparency	3
3.2	Behavior Expected of D-Marin Employees.....	3
3.3	Behavior Expected from Executives and Directors.....	3
3.4	Behavior Expected from Business Partners.....	4
4.	Consequences of Not Complying	4
4.1	Implementation of Code of Conduct - Code of Conduct Committee.....	5
5.	Individual Conduct.....	6
5.1	Bribery	6
5.2	Conflicts of Interest.....	6
5.3	Gifts and Hospitality	7
5.4	Travel and Expenses	10
5.5	Confidentiality of Information	10
6.	Compliance with Local Legislation	10
6.1	Competition Law	11
6.2	Sanctions	11
7.	Financial Integrity	11
7.1	Principles of Saving	12
7.2	Using Company's Assets.....	12
7.3	Committing to Contracts and Expenditure.....	12
8.	Public Communications.....	12
8.1	Speaking on Behalf of D-Marin	12
8.2	Privacy	13
9.	Employees.....	14
9.1	Human Rights.....	14
9.2	Our HR Practice	14
9.3	Diversity and Inclusion	15

Group Code of Conduct

Group Code of Conduct

9.4	Harassment and Bullying	15
9.5	Working Outside the Company	15
10.	Health, Safety and Environment	16
10.1	Key Elements.....	16
10.2	Drugs and Alcohol	17
11.	Communities	17
12.	Key Performance Indicators.....	17
13.	Appendix	18
13.1	Relationships with Customers Within D-Marin Group	18
13.2	Relationships with Suppliers at D-Marin Group	18
13.3	Relationships with Shareholders at D-Marin Group	19

Version	Code Owner	Approved By	Date Approved
1.0	D-Marin Global Chief People Officer	Oliver Dörschuck, D-Marin Global CEO	November 2021
2.0	D-Marin Global Chief People Officer and CFCO	Oliver Dörschuck, D-Marin Global CEO	June 2023
2.1	D-Marin Global Chief People Officer and CFCO	BODs of D-Marin	July 2025
3.0	Corinne Reynaud, D-Marin Global Chief Finance and Compliance Officer Christina Samoulada, D-Marin Global Chief People Officer	Venilia Investments Sarl BOD	23 April 2026

Group Code of Conduct

Group Code of Conduct

Purpose & Strategy

Our Code of Conduct sets out the expectations regarding the basic ethical principles and work rules that must be applied by every single person working for and with D-Marin during the execution of their duties. Our purpose in the creation of our Code of Conduct is to provide clarity, reinforce trust and underline our commitment to employees, customers, partners, suppliers and shareholders.

The Code of Conduct serves as a guideline for our informed decisions and for our mode of business conduct.

1. Scope

This Code of Conduct applies to all companies within the D-Marin group, defined as Venilia Investments Sarl and any direct and indirect subsidiary of Venilia Investments Sarl and any entity in which any D-Marin entity either owns a majority interest or otherwise controls (all of the above are referred to throughout this Code individually and collectively as **D-Marin** or **D-Marin Group**).

Every D-Marin employee must comply with this Code of Conduct. This includes employees across all locations where D-Marin operates, every full-time or part-time employee, director and executive at every level of D-Marin, irrespective of location and position.

This Code outlines expectations from every individual or legal entity working for and with D-Marin.

This Code must be evaluated in conjunction and in partnership with D-Marin Group's every other policy and procedure, including:

- Anti-Fraud and Anti-Bribery Policy;
- Business Partner Anti Bribery Procedure;
- Anti-Money Laundering and Counter Terrorism Financing Policy;
- Sanctions Compliance Policy and related policies and procedures;
- Procurement Policy and Procedures Manual;
- Speak Up Policy; and
- Gifts and Hospitality Registry.

Note that as of 1 September 2025, and the introduction of the D-Marin Supplier Code of Conduct, any reference to the Code of Conduct in supplier contracts or documents is substituted by the in-force Supplier Code of Conduct, as available at www.d-marin.com/en/compliance/.

Group Code of Conduct

Group Code of Conduct

2. Roles and Responsibilities

D-Marin Global Chief Finance and Compliance Officer and D-Marin Global Chief People Officer – Code Owners: The CFCO and CPO hold ultimate accountability for ensuring that this Code is drafted, approved, implemented, maintained and monitored to maintain its effectiveness and alignment with organisational objectives.

Executive Committee: The Executive Committee members are responsible for compliance for all employees within their functions, wherever they are located.

Local HR teams: Local HR teams are accountable for managing relevant communications in their market, in line with D-Marin standards, and for reporting any case that is mentioned to them or that they become aware of.

Code of Conduct Committee: The committee, consisting of D-Marin Global Chief Finance and Compliance Officer, D-Marin Global Chief People Officer and Legal Director, are responsible for assessing and evaluating any incident reported to them and assigning competent employees to investigate the incident further, prior to the committee reaching any disciplinary decision.

3. Values and Code of Conduct Principles in D-Marin

D-Marin has established a set of core values and principles that guide the conduct of all individuals working for and with D-Marin.

D-Marin:

- Conducts business with its customers, suppliers and other business partners in an honest, fair and lawful manner to ensure satisfaction of its customers' needs.
- Ensures that its employees work in a motivating and supporting social culture and conducts business in a healthy and secure environment.
- Respects the environment, complies with environmental standards, and makes the maximum effort to minimize energy consumption.
- Endeavors for constant development in its work for the benefit of all its shareholders.
- Embraces the responsibilities and duties it has towards its customers and uses all kinds of resources available for the best effective solution.
- Provides all Health & Safety measures for employees, business partners and customers to ensure the highest safety standards.

In the event of a possible dispute or conflict of interest, D-Marin will carry out an evaluation from the perspective of the customer without prejudice.

Group Code of Conduct

Group Code of Conduct

D-Marin's Code of Conduct advocates the implementation of anti-corruption measures in all locations where D-Marin operates. By its strong commitment to anti-corruption principles, D-Marin increases the reliability in the business environment.

3.1 Honesty, Righteousness and Transparency

Honesty, righteousness, and transparency are the most fundamental principles of D-Marin.

D-Marin protects and reflects its image, reputation and respectability in all fields where it operates in the best manner with strict commitment to these principles.

Information announced by D-Marin must be complete and accurate. Notifications made within the corporation, outside the corporation and to the public must be in accordance with the principles of righteousness and honesty. D-Marin adopts the virtues of honesty, righteousness, transparency, and proper business conduct in all its activities and notifications, inside or outside the Group and avoids any conduct which may damage mutual trust.

D-Marin expects its business partners (i.e., suppliers, consultants, contractors, etc) to have the same values and act in line with the D-Marin Code of Conduct. D-Marin builds its business affairs on the principle of mutual trust.

In any of its business relations, if such an environment of trust is damaged or fails and cannot be recovered, D-Marin reserves the right to terminate its relationships with the relevant parties.

3.2 Behavior Expected of D-Marin Employees

D-Marin Group employees are expected to act with integrity and professionalism at all times.

D-Marin Group employees and directors are expected to understand the Code of Conduct and behave in compliance with its provisions and applicable law at all times. They are required to exercise good judgement and speak up in circumstances that may appear improper.

In order for our employees to assist management in building a high-integrity culture and environment within the D-Marin Group, they are expected to understand the Code of Conduct, reflect it in their work and endeavour to always do the right thing. If they are unsure of what to do with respect to a matter, they should not hesitate to consult their line manager or Human Resources.

3.3 Behavior Expected from Executives and Directors

Though the Code of Conduct applies to everybody working for and with D-Marin, Executives and Directors play an integral role to the creation of an ethical behavior culture.

Executives and Directors must always act as a role model for the correct behavior and create the conditions to:

- ensure that all employees in their team understand their responsibilities which are within the framework of the Code of Conduct and other group policies.

Group Code of Conduct

Group Code of Conduct

- create opportunities for the Code of Conduct to be discussed and talk to employees on the significance of a business Code of Conduct and compliance.
- create an environment where employees can express their opinions easily without hesitation.
- consider the Code and other group policies when evaluating employees' performances.
- encourage employees to make decisions and engage in actions that consistently uphold ethical management principles, codes of conduct, and legal regulations, while discouraging any behaviors that may compromise them.
- hold employees accountable for complying with the Code of Conduct.
- discipline employees within the team who violate the Code of Conduct or laws.

3.4 Behavior Expected from Business Partners

Anyone who works with D-Marin (including but not limited to suppliers, consultants and other business partners) must share our commitment to integrity by following the principles of our Supplier Code of Conduct when providing goods and services to D-Marin or acting on our behalf.

4. Consequences of Not Complying

Failure to act with integrity and in line with the Code of Conduct will lead to disciplinary action, dismissal or termination of contract in the case of business partners.

Review Acts and Consult

In circumstances where you are in doubt with respect to your conduct, ask yourselves:

- Is the situation in compliance with the Code of Conduct?
- Does it seem ethical?
- Is it legal?
- Will this situation reflect on my company, our Group and me positively?
- Would I be proud to tell others about my actions?
- Would I want to read about it in the newspaper?

If the reply to any one of these questions is "No", do not commit such act.

All D-Marin employees (including executives and directors) must evaluate whether their own and/or their colleagues' behaviour is consistent with the Code of Conduct. If any difficulty is encountered

Group Code of Conduct

Group Code of Conduct

in making such an evaluation, or if it is believed that the conduct is not ethical, the opinion of the Code of Conduct Committee of D-Marin must be obtained. Reporting decisions and conduct that are observed as not being compliant with the Code of Conduct is the shared responsibility of each D-Marin employee and business partner.

4.1 Implementation of Code of Conduct - Code of Conduct Committee

The Code of Conduct Committee is responsible for investigating and resolving complaints, reports and notifications regarding breach of the Code of Conduct. The Code of Conduct Committee, which operates in affiliation with the Board of Directors of D-Marin Global, is composed of persons in the following posts:

- Chairman of the Code of Conduct Committee: D-Marin Global Chief Finance and Compliance Officer (D-Marin Global Services)
- Member of the Code of Conduct Committee: D-Marin Global Legal Director (D-Marin Global Services)
- Secretary and Member of the Code of Conduct Committee: D-Marin Global Chief People Officer (D-Marin Global Services)
- Alternate Member of the Code of Conduct Committee: D-Marin Global Chief Executive Officer (D-Marin Global Services), to participate in the committee ad hoc if required by severity of case or conflict of interest of one of the other members

We recommend that employees contact and consult with the following senior executives (in the below order) prior to contacting the Code of Conduct Committee Line (if applicable):

- Related department's manager
- Local HR manager
- Marina general manager / Head for the Country.

Notifications of D-Marin Group employees and business partners to the Code of Conduct Committee are kept in strict confidence. All examinations and investigations are conducted confidentially. Any event of reprisal against an employee or business partner who has raised a concern in an honest manner constitutes a breach of the Code of Conduct.

Members of the Code of Conduct Committee may be contacted directly through the following portal which is designated for queries and notifications. When required, any person may write the issue in his/her native language and send it through the following external portal: <https://dmaringlobal.ethicspoint.eu/>.

All notifications made to the Code of Conduct hotline, will receive a reply in 24 hours.

Group Code of Conduct

Group Code of Conduct

5. Individual Conduct

5.1 Bribery

The direct or indirect offer, payment, solicitation or acceptance of bribes in any form for retaining or obtaining business, or to influence a decision made within D-Marin, to a government official, customer, business partner or other person in the public or private sector, or for any other reason, is illegal and unacceptable. Any approach made to a D-Marin employee, government official, business partner, customer or any other person for an inappropriate payment should be reported immediately.

A bribe includes:

- any facilitation payment; and
- giving or accepting gifts and hospitality might also be considered bribery in certain situations.

D-Marin takes a zero-tolerance approach in giving or receiving bribes or improper payments in any form and will uphold all provisions of the law relevant to countering bribery and corruption in all the jurisdictions in which it operates.

All employees must comply fully with the requirements of the Anti-Fraud and Anti-Bribery Policy and the Anti-Money Laundering and Counter Terrorism Financing Policy in all of their activities on behalf of D-Marin.

5.2 Conflicts of Interest

All persons in the scope of this Code are obliged to prevent any kind of conflict of interest between D-Marin and their individual activities.

Our employees are expected to act in the best interests of D-Marin and not to provide benefits to themselves, their families, relatives, suppliers, customers, other employees, business partners, competitors or persons with whom they have business relationships, by taking advantage of their current positions. Employees must arrange their relationships in such a manner as not to impair the reputation of the Group.

Our business partners suppliers/contractors cannot seek approvals for invoices or agreements from persons in D-Marin with whom they have a direct conflict of interest (e.g. family members). In D-Marin, conflicts between company interests and personal interests, obtaining inappropriate personal advantages, or providing benefits to relatives or business partners using one's position are not permitted under any circumstances.

In the event that any involved party is in a situation where personal and business interests might potentially come into conflict, they are required to declare these conflicts and obtain approval.

Group Code of Conduct

Group Code of Conduct

Examples of potential conflicts of interest:

- Any employment, including a non-executive or advisory role for a company which is a competitor of, or supplier to, D-Marin.
- Having a partner or close relative who also works in D-Marin.
- Holding a senior role whilst your spouse or partner holds a similarly senior position at a competitor.
- Any type of debtor/creditor, tenant/lessor, surety or similar relationship of benefit with subordinates or superiors.

Conflicts of Interests should be registered through the local HR at the time of hiring or whenever they occur.

5.3 Gifts and Hospitality

Corporate gifts or hospitality must only be offered/accepted when it is reasonable, transparent, infrequent and for the purpose of building business relationships. D-Marin understands and supports reasonable and proportionate giving and receiving gifts and hospitality as part of normal business relations. However, it is important that gifts or hospitality never influence business decision-making processes, or cause others to perceive any influence. For this reason, employees who play a significant role in decision making processes for business partners, including suppliers, should in principle reject or return all gifts other than low-value, branded items or low-value consumable gifts, such as chocolates.

Accepting Gifts and Hospitality

- Gifts of cash or cash-equivalents (gift cheque, gold, treasury bonds, and share certificates) should not be accepted.
- The value of any individual gift received by an employee shall not exceed **EUR 70**, and the aggregate value of gifts received by an employee from the same business partner shall not exceed **EUR 210** in any given year.
- The value of hospitality received by any employee must not exceed **EUR 130** per person per occasion, and the aggregate value of all hospitality received by an employee from the same business partner shall not exceed **EUR 390** in any given year.
- Where applicable local laws set lower thresholds for the provision or receipt of gifts or hospitality, those lower limits shall apply.
- Receiving gifts, hospitality or benefits which are clearly meant for achieving a favor or preferential treatment is prohibited.

Group Code of Conduct

Group Code of Conduct

- Receiving bribes and/or commissions may not be accepted under any condition.
- D-Marin employees may accept gifts which are given for reasons such as sales campaigns and promotional activities, and which do not exceed **EUR 70** in value.
- D-Marin employees may participate in business-related meals, training sessions, lunches, hospitality and meetings which may not be regarded as gifts, are customary in the business context and of a reasonable standard, provided they do not exceed **EUR 130** per person per occasion.
- It is essential that gifts are sent to the business address.
- All gifts that do not comply with this Code should be returned to the sender.
- D-Marin employees may participate in events sponsored by suppliers, consultants, banks, other business partners or customers and affiliated entities of such persons, so long as there are no conditions which may affect their impartiality and decisions. For all employees and executives at all levels, participation in all such events must be notified to the employee's line manager and recorded by the local HR Department.
- Any exceptions to the above monetary thresholds for accepting gifts and hospitality, including in exceptional circumstances where local cultural practices necessitate the exchange of gifts or hospitality above these limits, require prior written approval from senior management and the D-Marin Global Chief Finance and Compliance Officer and must be properly recorded; in all cases, applicable local legal thresholds must be observed and must not be exceeded.

Giving Gifts and Hospitality

- D-Marin employees are prohibited from giving gifts of cash, loans or cash-equivalents to customers, sub-employers, suppliers, consultants, competitors, or any other business partner.
- The value of any individual gift given by D-Marin to a person in the private sector (including customers or business partners) shall not exceed **EUR 70** per person, and the aggregate value of gifts given by D-Marin to the same person shall not exceed **EUR 210** in any given year.
- The value of any individual hospitality provided by D-Marin to a person in the private sector must not exceed **EUR 130** per person per occasion, and the aggregate value of all hospitality provided by D-Marin to the same person shall not exceed **EUR 390** in any given year.
- Where applicable local laws set lower thresholds for the provision or receipt of gifts or hospitality, those lower limits shall apply.

Group Code of Conduct

Group Code of Conduct

- Giving or offering gifts, hospitality or benefits which are clearly meant for a favor is strictly prohibited.
- Giving/offering bribes and/or commissions is not accepted under any condition.
- D-Marin may bear the reasonable travel costs and event expenses of suppliers, consultants, banks, other business partners or customers only upon approval of the D-Marin Global Services management team (C-suite) of the relevant function.
- D-Marin employees may give gifts for reasons such as sale campaigns, promotional activities and which do not have a value exceeding **EUR 70** per person in the private sector.
- Any exceptions to the above monetary thresholds for giving gifts and hospitality require prior written approval from senior management and the D-Marin Global Chief Finance and Compliance Officer and must be properly recorded, but applicable local legal thresholds must be observed and must not be exceeded.

Recording Gifts, Hospitality and Travel Expenses Given and Received

- All gifts, hospitality and travel expenses given or received by D-Marin employees must be recorded by the HR Department. Any employee offering or receiving a gift, hospitality or covering the costs of any travel expense is required to notify their line manager by email, copying the HR Department, and to specify:
 - The company and/or name of the person to whom the gift, hospitality or travel expense is offered or from whom it is received;
 - A brief business justification; and
 - The estimated value and type of the gift, hospitality or travel expense.
- The HR Department shall maintain a central register of all gifts, hospitality and travel expenses given and received.
- Local HR Departments report to the D-Marin Global Chief People Officer and the Code of Conduct Committee once a year regarding all gift and hospitality records.

Gifts and Hospitality to Government Officials

- Gifts and hospitality to government officials attract additional risk for D-Marin. You must obtain written pre-approval from the D-Marin Global Chief Finance and Compliance Officer before giving gifts or hospitality of any value to, or covering the travel costs for, a government official.
- As a general guideline, providing small tokens of a de minimis value with D-Marin's logo, such as coffee mugs or calendars, to government officials may be permitted

Group Code of Conduct

Group Code of Conduct

(subject to the pre-approval requirement). However, due to stringent anti-bribery laws in relation to dealing with government officials, any other gifts and hospitality over a de minimis value to government officials are generally prohibited, and approval will not be granted.

5.4 Travel and Expenses

There are rules set out regarding travel and expenses that can be claimed for business reasons. When travelling, it is important to find the right balance between the company's business needs, environmental impact, financial cost and personal health and safety.

Travelling should always occur through the local assigned travel agency. Permission for travelling should be gained prior to any booking.

Regular travelling from and into your place of work cannot be reclaimed.

Travelling for business with partners, family members or friends though not prohibited, cannot be reclaimed in terms of expenses.

5.5 Confidentiality of Information

Information on D-Marin cost structures, pricing and sales, etc. are vital for our business and provide us an advantage over our competitors. This is the reason all business secrets must be kept confidential and safe. Similarly, we respect the business secrets of our competitors, business partners and other third parties.

To protect D-Marin secrets, we must also prevent unauthorized access to our IT systems.

Employees should lock devices when away from their desk, not share passwords with anyone and not leave documents that contain sensitive information unattended.

Never click on links or download attachments without knowing who they come from, and report any suspicious behaviour to the IT department.

Protect your devices from loss or theft and inform the IT immediately in such instance. Do not use personal accounts to store confidential information.

6. Compliance with Local Legislation

All D-Marin Group companies and their employees are obliged to act in compliance with the local and international rules and regulations. The D-Marin Group companies are obliged to submit accurate, complete and comprehensive information to government agencies and institutions in a timely manner.

The persons and entities covered under this Code are not permitted to commit illegal acts for the sake of gaining commercial or personal interests.

Group Code of Conduct

Group Code of Conduct

It is essential that the financial and commercial records are correct and in compliance with the law. Transactions carried out with governmental authorities are determined by special legal rules and differ from affairs conducted with the private sector. Company employees are responsible for knowing and understanding such rules. In case of doubt, it is essential to consult Company's Legal Counsel or the Code of Conduct Committee.

6.1 Competition Law

D-Marin believes in free and fair competition. We expect our employees at all levels to act in accordance with relevant legislation that forbids arrangements with competitors that affect trading in the markets. D-Marin employees should never discuss confidential information of D-Marin with competitors or be engaged in discussions that might hinder the principles of free competition.

- Honest and ethical competition is aimed to be achieved within the framework of competition laws and ethical rules, whereas unfair competition is avoided. Competition is carried out only on lawful and ethical grounds.
- In relation to any kind of activities initiated with the representatives of other companies, special sensitivity is paid to ensure that such activities shall not amount to an infringement and competition rules are all the time well-respected.
- Attempts to restrict or limit competition are not supported.
- Intentional slander and defamation of competitors are not accepted. Any undertaking regarding any services that D-Marin cannot provide shall be avoided.
- Since the rules are complex and differ from one country to another, employees should consult the legal department to request explanations and information when necessary.

6.2 Sanctions

D-Marin and its business partners must comply with sanctions laws in multiple countries. These laws prevent D-Marin from dealing with certain people, companies, countries and regions. All employees must comply fully with the requirements of the Sanctions Compliance Policy and associated procedures in all of their activities on behalf of D-Marin.

There may be extra requirements and restrictions for US citizens and US stakeholders; please consult with the Legal Department for details. All employees must comply fully with the requirements of the US, EU, UK Recusal Policy for Sanctions Compliance in all of their activities on behalf of D-Marin.

7. Financial Integrity

D-Marin and its employees should only spend company funds where there is a legitimate business need and where the cost justifies the benefit.

Group Code of Conduct

Group Code of Conduct

Managers and C-Suite employees have an additional duty to ensure that their teams manage budgets well and spend company resources with caution. The following elements should be taken into consideration when assessing the benefit of an expenditure: cost, quality, reliability, sustainability, compliance with the Code of Conduct and commitment to its terms and conditions.

7.1 Principles of Saving

It is D-Marin Group's principle to prevent waste and to promote savings in its use of resources within its activities and during projects it conducts. These principles are taken into consideration in decision making processes with respect to business and the internal audits.

7.2 Using Company's Assets

D-Marin Group not only protects its own rights but also respects others' assets and rights. D-Marin Group endeavours not to work with parties which may damage the Group's values and assets, do not comply with the Code of Conduct and/or do not behave in accordance with the environment and health of the society. D-Marin ensures that its assets and resources are used efficiently during working hours for business purposes only.

7.3 Committing to Contracts and Expenditure

D-Marin employees should not commit the company to a contract or expense without ensuring the appropriate authorisation first. D-Marin suppliers, consultants and collaborating parties should obtain approvals of contracts and invoices only through the officially authorised members in each country.

Delegation of authority applies to all approvals for contracts, the document details level of authority required to commit the company and its resources.

For any contractual commitments or expenses on behalf of the company, there must be a relevant approval.

8. Public Communications

8.1 Speaking on Behalf of D-Marin

D-Marin commits to communicate openly and transparently to all stakeholders within the boundaries of commercial confidentiality. All confidential information needs to be protected from improper disclosure that might endanger D-Marin's reputation or ethical trading.

Only people that are authorized by delegation of authorities with the related subject may represent D-Marin before the public within the scope of the conditions and matters of the subject that they are authorized for.

Group Code of Conduct

Group Code of Conduct

8.2 Privacy

D-Marin values privacy. D-Marin commits to processing personal data of employees and customers with integrity and in line with applicable laws.

Confidential information may be defined as financial, strategic, technical, commercial, personnel-related matters, matters within the scope of confidentiality agreements executed with business partners, and similar information which belongs to D-Marin Group, is not known by business partners, and if known, may cause loss for the Group and/or its stakeholders or may benefit others.

The following information, which is not announced or made available to the public by the Group, is considered confidential information:

- Employee information, inventions, agreements, strategic and business plans, significant changes in management, new products launched in the market, mergers and acquisitions, technical specifications, pricings, offers, financial data, costs, information, transactions, computer software, technical information, materials, records, files, documents, programs, reports, notices, announcements, analyses, data, customer lists, commercial secrets and similar information belonging to D-Marin and business partners with whom business affairs are conducted and which are not available to the public are considered confidential information.

All D-Marin employees and those suppliers/consultants that are legally delegated to have access to any of the above information are expected to protect it and use it for D-Marin purposes only.

All above mentioned parties need to show diligence for the protection of information belonging to D-Marin and all its stakeholders.

Our employees maintain and keep the information and professional secrets they obtain during the performance of their duties in accordance with the confidentiality policy; and share such information with the relevant persons within designated authorities only.

Employees leaving the company are not allowed to share confidential information with third parties. They are required to submit all confidential documents and/or electronic copy documents of the company that they obtained during the term of their employment.

D-Marin consultants are required to demonstrate the same diligence in maintaining and sharing information as employees.

The company respects the use of employee information according to the local laws in place. All employees through appropriate training need to:

- understand the principles that apply to their respective roles;
- base their day-to-day decisions on the confidentiality principles;

Group Code of Conduct

Group Code of Conduct

- incorporate the privacy principles in the design and delivery of any potential service; and
- ensure appropriate data management practices.

9. Employees

9.1 Human Rights

D-Marín Group believes in and supports human rights absolutely in all places and environments it operates.

D-Marín Group complies with the International Labour Rules. In this respect, it adheres to the minimum age for employment in line with local law in every jurisdiction in which it operates.

Also, in this respect, our group makes no discrimination with respect to ethnic origin, gender, color, race, nationality, economic status, disability, age, religion and other beliefs. This is also applicable for recruitment and promotion; working conditions; and all relationships with customers, suppliers, and partners.

D-Marín employees have the freedom to have a role and act as volunteers in non-governmental organizations and public interest services and other associations/organizations, by considering the working hours, sense of duty and responsibility. Additionally, everyone has freedom of right to assembly. We expect that our suppliers/ consultants show the same respect and diligence with the human rights of their employees.

9.2 Our HR Practice

We aim to create an inclusive environment where everyone feels respected and valued and can truly belong.

To ensure human resources management of high standards, the fundamental principles of D-Marín Group are summarized below:

- For the enhancement of the working environment, D-Marín supports its employees to freely express themselves and undertakes the development of a relationship of mutual trust at all levels. All employees are entitled to work in a healthy; harassment-free environment per the legal regulations.
- In recruiting and promoting its employees, D-Marín considers the qualifications and skills required by the job and the performance of the person; as the fundamental tenet.
- It complies with the relevant rules and regulations in respect to employment of the disabled and arranges supporting activities for their employment.

Group Code of Conduct

Group Code of Conduct

9.3 Diversity and Inclusion

D-Marin pursues equality of opportunity and inclusion for all employees through our employment policies and practices.

At D-Marin, we recognise and celebrate the importance of diversity in our workplaces so that we are as diverse as the customers we serve. We will not tolerate any form of discrimination, including but not limited to discrimination related to age, gender, race, disability, gender identity, sexual orientation, cultural background or belief. We base relationships with and between employees, as well as suppliers/consultants, on respect for individuals and their human rights. We will not tolerate any form of child labour.

D-Marin urges the challenge of discriminatory behavior when it is seen. We want everyone to feel able to raise any concerns.

- Act fairly and show respect towards others in all your dealings.
- Challenge discriminatory behavior.
- Raise any concerns through your local HR team or the speak up process.
- Base any employment decision you make purely on merit.

9.4 Harassment and Bullying

At D-Marin we want everyone to feel able to raise any concerns and challenge discriminatory behavior when it is witnessed.

Even if there is no superior-subordinate relationship, D-Marin absolutely prohibits all kinds of sexual or moral harassment, all acts classified in the International Labor Organization's report under "Violence at Work" and actions deemed as "mobbing" – details at International Labor Organization (ilo.org).

9.5 Working Outside the Company

D-Marin employees may not accept any public or private, permanent or temporary, paid or unpaid duty outside the company when working in a second job, whether or not it creates a conflict of interest, or the employer is in competition with D-Marin.

To ensure that working in a second job does not cause any ethical misconduct, it is obligatory for the employees to inform the Human Resources Department with written notification to prevent any potential damages.

Group Code of Conduct

Group Code of Conduct

Additionally, if the second job is of different nature or industry in which employee is running in D-Marín, the employee is permitted to work, provided that the following conditions are satisfied concurrently:

- It shall be evaluated and approved in writing by the management if working in the second job creates a conflict of interest.
- Opinion of the supervisor of the employee and Human Resources to the effect that there is no decrease in the performance in the current situation.
- The person is not engaging in any activity with respect to the second job during working hours.

Employees may take offices in educational institutions to share their professional experiences provided that the above-listed conditions are satisfied.

Employees may take offices as volunteers in philanthropic and non-profit organizations so long as it does not hinder their duties within D-Marín Group.

10. Health, Safety and Environment

10.1 Key Elements

D-Marín is a socially responsible corporation that respects the environment, complies with environmental standards and rules, and continually seeks to reduce energy consumption and carbon dioxide emissions.

Considering the principles of "Occupational Safety First" and "Respect for the Environment and Future Generations" in line with our aims and targets, we, as D-Marín:

- Identify health, safety and environmental risks in our activities; take precautions; and control their effectiveness in order to prevent health deterioration, occupational accidents and environmental pollution.
- Comply with the relevant legislations regarding the environment, health, and safety; and abide by the requests made by the relevant parties.
- Train and inform everyone who is affected by D-Marín's health, safety and environment policies and procedures.
- Verify that they understand all such policies and procedures.

None of the individuals or executives within our Group has the authority to behave in an inconsistent manner with the environmental protection policy, to permit any such behavior, to give instructions for such effect or to tolerate the same.

Group Code of Conduct

Group Code of Conduct

We expect our suppliers and other business partners to abide by the principles of health and safety and apply them with diligence.

10.2 Drugs and Alcohol

Any use, sale or distribution of alcohol and illegal substances while working will be treated extremely seriously. Please support your colleagues by reporting any breaches of this Code to your local HR team. D-Marin commits to providing support to those affected by problems with alcohol or drugs.

11. Communities

D-Marin Group's high performance, productivity and profitability in fields of its activity are not only the Group's commercial success, but also its substantial contribution to the economies of countries in which it operates.

D-Marin Group has chosen to work in a manner committed to the principles of social responsibility and "sustainability". In addition to the above, the concept of Sustainable Development also includes the principles of productive and profitable work and planning for the company's future. D-Marin plans its responsibilities towards the society within the principles of "sustainability" and contributes to the society with a sense of social responsibility.

12. Key Performance Indicators

KPI	Measurement	Target
Number of informed employees	% of employees that have attended the Code of Conduct training	100%
Number of reported concerns	# of cases reported in speak up line	
	% of substantiated cases	
	% of cases that resulted in Disciplinary action	
Anti bribery training	% of people managers attending yearly Antibribery training	100%

Group Code of Conduct

Group Code of Conduct

13. Appendix

13.1 Relationships with Customers Within D-Marin Group

- Customer information is protected with the same sensitivity as if it were D-Marin's own information.
- Customers are approached with customer satisfaction point of view. All customers are treated with care, honesty and fairness that will generate the highest level of customer satisfaction loyalty.
- Customers' requests and expectations are taken into account and customer-oriented processes, products and services are structured accordingly.
- Customers' requests are approached proactively in accordance with the agreed terms. It is aimed to meet requests in a timely and accurate manner by constantly improving product and service quality based on the customer's needs.
- Products and services offered are under D-Marin Group's assurance and guarantee.
- All customers are approached on the same grounds and are not treated preferentially. Customers are not provided with any tangible or intangible benefits such as unfair promotional and marketing allowances, gifts, hospitality or similar.

13.2 Relationships with Suppliers at D-Marin Group

- It is believed that the goods and services provided by suppliers directly affect the quality of the goods and services of D-Marin. In this respect, suppliers are selected among the entities operating at the desired quality and standards. For this reason, suppliers are considered as business partners.
- Supplier selection process is transparent and impartial.
- Current suppliers and suppliers that may be considered as potential vendors are treated in a fair and respectful manner. Necessary care is taken to meet obligations in a timely fashion.
- Confidential information of suppliers with whom business is conducted is protected with care.
- No business is conducted with suppliers that are identified as having violated laws and not having behaved in accordance with business Code of Conduct.
- Suppliers, brokers and sub-contractors may not be used to commit an act which is contrary to law or the Code of Conduct. It is unacceptable for employees to receive commission payments or any tangible or intangible benefits of similar nature from suppliers.

Group Code of Conduct

Group Code of Conduct

- Employees are not permitted to accept gifts which may adversely affect their objectivity in decision-making, in accordance with the thresholds set out in Gifts and Hospitality section of this Code.
- While conducting their relationships with suppliers, employees act in a manner to avoid any impression that may cause business partners to think that there is a relationship based on interest.

13.3 Relationships with Shareholders at D-Marin Group

- Shareholder relations are based on principles of trust and transparency.
- The primary purpose of the company management is the creation of perpetual value for shareholders.
- Financial data or all kinds of information necessary for decision-making must be communicated in an accurate and complete manner. Persons preparing such information are responsible for the information they prepare and must ensure that the related principles are complied with.
- It is essential to ensure that all business and financial records of the company are accurate and in compliance with D-Marin policies and procedures as well as applicable laws and regulations. Such principles are applicable not only to financial accounting records, but also to quality reports, timing records, expense reports, claim forms, curricula vitae and all other similar records.
- All kinds of information or events (lawsuits, etc.) that may have a financial impact must be promptly notified to the Finance and Legal Department.
- No record, under any circumstances, may be distorted and fictitious records may not be entered in the books. No asset or property that is not registered in the name of D-Marin may be kept.
- Shareholder's expectations from the top management, instructions, decisions taken and implementations regarding such decisions are stated mutually in writing.