
	Policy 03	Version 01
	Ethical Codex	Valid from: 1.12.2023
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Full Name	POL03 Ethical Codex
Purpose	To set up rules for ethical and anti-corruption behavior of Employees
Effective date	December 1 st 2023
Applicability	This policy is intended for internal use by the DoDo Group SE and is binding for all employees of the companies within the DODO Group (hereinafter referred to as the 'Companies'). The policy is also intended to be implemented within the DODO Group and its franchise branches. The management of subsidiaries and franchise companies in the DODO Partner program must implement this policy into their internal documentation, making it binding for their employees and transportation service providers. Additionally, the policy serves to declare the commitment of the Company's management to its business partners and relevant third parties to adhere to adopted ethical and anti-corruption principles.
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<i>This is a translation; the original signed version of the document is available in Czech language.</i>		

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1. Purpose

This ethical codex defines the rules for ethical and anti-corruption behavior within the DODO Group.

2. Scope

The ethical codex applies fully to members of statutory bodies, all employees of the companies within the DODO Group, all members of statutory bodies and employees of franchise companies in the DODO Partner program, and relevant service providers. (For brevity, the term 'Employee' is used, but it refers to all the aforementioned individuals.)

3. Principles of Legal Compliance

All Employees are required to act in accordance with legal regulations and ensure that these are not violated. Employees must comply with the general binding regulations of the country in which they operate, the general binding regulations of the European Union, international agreements, as well as the Company's internal regulations, including this Codex.

Employees must avoid violating the law, especially in areas related to criminal liability, but must also consider the possible disciplinary consequences that could arise from breaching duties under their employment contract.

All Employees are obligated to adhere to the legislative rules of economic competition.

4. Principles of Ethical Conduct

The Company's management considers ethical behavior and "Fair Play" principles as an integral part of corporate culture.

The Company aims to present itself as a reliable, transparent, and fair partner, both towards its employees and external partners, suppliers, and third parties.

The Company's management and all Employees ensure equal conditions for all Employees without distinction of gender, nationality, race, age, religion, or disability. They respect human dignity and personal rights, and do not tolerate violence, discrimination, intimidation, threats, or any other inappropriate behavior within the Company or at the workplace.

The Company's management encourages teamwork, the sharing of knowledge and information, and a willingness to assist one another.

The same approach is required for both permanent Employees and Employees of franchise companies in the DODO Partner program, as well as external transportation service providers (couriers).

Employees are required to perform their work duties with full commitment and ensure that their private interests do not conflict with the Company's interests. They must prevent any situation that could lead to a conflict of interest.


Employees must report any personal interests that could influence the assignment or execution of their tasks to their superior. Engaging in other remunerated activities that are identical to the employer's business activities is only allowed with prior written consent from the employer.

5. Responsibility for the Company's Reputation

The Company's management considers the Company's reputation one of the most important assets and places great importance on maintaining its good reputation in terms of integrity and honesty.

Employees should refrain from any actions (including private ones) that could damage the legitimate interests of the Company. Employees must exercise caution when using social media and communication tools, even in private activities, and avoid sharing confidential information that could be perceived as offensive, damaging, humiliating, or defamatory towards individuals or the Company.

Employees must also adhere to data protection regulations when publishing photos of individuals or groups.

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6. Anti-Corruption Principles

The Company strictly rejects all forms of corruption. Employees are required to always act ethically in their activities, demonstrating honesty, integrity, and fairness in all respects.

The Company and its Employees are fully aware of the harmful consequences that corruption could have on the Company's business activities, its Employees, and the community in which the Company operates.

In many countries, both individual Employees and managers, as well as the entire Company, may face prosecution for illegal actions (the unlawful acts of a physical person may be attributable to a legal entity if committed in its interest or within its activities, under the conditions specified by the law on the criminal liability of legal entities).

Most forms of corruption are criminal offenses in the countries where the Company operates. In many of these countries, individuals who offer or accept any bribe can be sentenced to imprisonment.

Any suspicion or accusation of corrupt behavior would significantly harm the Company's reputation and disrupt its business activities.

The Company strictly prohibits:

- Offering bribes to any persons,
- Accepting bribes from any persons,
- Any form of suggestion or proposal to offer or accept a bribe, solicitation of bribes, offering or mediating bribes, or any other dealings involving bribes, and
- Using other individuals to engage in any of the above activities.

A bribe is anything provided to a person with the intent of persuading them to misuse their position or commit another unlawful act, or as a reward for such behavior.

Bribes can take any form, including cash, bank transfers, physical goods, hospitality, or services. For clarity, small gifts of low value, as described in Chapter 8, and tips for couriers are not considered bribes.

The Company commits to organize regular anti-corruption training for Employees, tailored to their specific roles.

7. ESG Principles

The Company is committed to maintaining high standards in environmental responsibility, social equity, and good governance. The Company's management and all Employees pledge to minimize the environmental impact of the Company, provide a fair and inclusive working environment for all employees, and uphold the highest standards of governance and transparency.

These ESG principles are integrated into all aspects of the Company's operations to positively contribute to sustainable development and ensure long-term value for investors and other stakeholders.

8. Accepting and Giving Gifts

Employees are prohibited from giving or receiving gifts or tokens of appreciation that could be interpreted as bribes or special advantages.

An exception is made for corporate gifts of low value. Any other gifts must be tactfully declined.

The rules for Company representatives regarding inviting partners to business meetings are governed by the internal directive **S30 Entertainment Policy**.

9. Reporting Violations of the Company's Principles

The Company encourages its Employees to promptly report any violation of laws, regulations, this Ethical Codex, or other internal Company policies.

Reporting is governed by the rules described in the internal directive **S18 Whistleblowing Policy**.

10. Attachments

POL03 P01	Courier's Ethical Codex
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