

#### Preface

Dear Colleagues, the success of our business is based on many aspects. The main reason is our responsible and fair behavior towards our colleagues in the workplace, our business partners and the public. Preservation and further development of the good name of DEAN TRANSPORT a.s. is our central purpose. Markets and cultures are converging. New laws and regulations place high demands on everyday life work. The expectations of our business partners and the public towards us are growing. The Code of Conduct is intended to guide you to an increasingly complex world. Rules The conduct formulated in this Code constitutes a common guide to responsible conduct in working life, but also outside it. Failure to follow these rules can cause significant damage to our company. The Code describes the expectations placed on us by our business partners and other interest groups. In cooperation with our business partners, especially with our customers and suppliers, we require compliance with the principles of this code of conduct.

The Company's management undertakes to thoroughly investigate any non - compliance with this Code and draw the appropriate conclusions from this.



#### 1. Basic rules of conduct

All employees of DEAN TRANSPORT a.s. or business partner have the right for respect, and fair treatment. We do not tolerate any disadvantages based on ethnic origin, disability, age, gender, religion or sexual identity. Discrimination or harassment will not be suffered at any DEAN TRANSPORT a.s. workplace in any form. Tangible and intangible ownership of the company is intended to support our employees in performing their tasks. We protect it from damage, loss or improper use. The central goal of our actions is safety in the workplace, maintaining and promoting the health of our employees.

## 1.1 Mutual behavior

We work with people of different nationalities, cultures and skin colors. We support the basic principles of the UN Universal Declaration of Human Rights. We value the personal values, personal life, opinions and right to privacy of all our colleagues, competitors and business partners. We do not tolerate discrimination based on skin color, gender, sexual orientation, religion, age, disability, nationality, and social or ethnic origin. No harassment or insult to colleagues, competitors and business partners will suffer at all workplaces of our company DEAN TRANSPORT a.s. We are reliable partners and we keep our promises.

#### 1.2 Equal treatment

Our goal is to treat our colleagues, competitors and business partners fairly, honestly and equally. We are committed to equal opportunities in promoting our colleagues and hiring new workers. We expect all employees of the company to comply with all local regulations laws and regulations associated with equal treatment and discrimination. The company DEAN TRANSPORT a.s. requires compliance with the content of this code of conduct for their suppliers and service providers. Especially when selecting suppliers and cooperating with suppliers and service providers must be the principle of non-discrimination is respected.

# 1.3 Management of company property and other property values

Tangible and intangible ownership of the company is intended to support our employees in performing their tasks. It can only be used for these purposes. By no means for personal gain. Supervisors and employees must also approach intellectual property responsibly society. We are all responsible for the proper use and protection of company property. Personal use of the company's property is permitted only upon approval. This applies in particular to the private use of services, equipment, buildings, and so on.



# 1.4 Safety and health at work

Workplace safety, maintaining and supporting the health of our employees are here for us highest priority. At the workplace, we comply with laws and regulations to ensure safety and health. In the long run we participate in the creation and further development of safe, sheltered and healthy worker environment. Regular security checks by internal and external security experts ensure compliance with safety regulations and procedures and internal instructions.

# 2. Compliance with the principles and procedures of fair competition

DEAN TRANSPORT a.s. and all their employees are personally responsible in their job positions for compliance with the national and local laws and regulations of the countries in which they operate. We are committed to complying with the laws and principles of fair and free competition as a cornerstone of a market economy without restriction. We comply with our tax obligations. We expect this from our business partners without exception. We do not tolerate the deception of tax authorities.

#### 2.1 Tax regulations

The company DEAN TRANSPORT a.s. complies with its tax obligations. We reject any form of abuse of law and aggressive tax optimization. We refuse to work with customers, suppliers and other business partners who use methods and actions, which is intended to deceive the tax authorities, or even allows it.

# 2.2 Fair competition and compliance with national and international agreements

The purpose of competition and antitrust law is to protect free and fair competition. They serve legitimate interests our customers and consumers. The company DEAN TRANSPORT a.s. supports this requirement without any restrictions. We do not engage in unethical or criminal competition practices. We reject price agreements and geographic market-sharing agreements between competitors. Our leading market position is based on the high quality of our work, our reliability and fairness. Each of us abides by the laws and rules of the fight against corruption, the fight against money laundering, customs and foreign economic law and environmental protection.



# 3. Conflict of Interest

Conflicts of interest raise doubts about the quality of business decisions and the person making them business decisions. We expect business decisions and actions not to be influenced by personal interests. We want to prevent situations in which the personal economic interests of employees and superiors of DEAN TRANSPORT a.s. lead to conflicts and conflicts of loyalty. The position in the company itself must not be used to gain an advantage for a close family member or benefits for friends. Business partners must not be preferred on the basis of personal interests.

## 3.1 Secondary activity

Ancillary activities include all activities of another employer, additional activities in own company, independent activities in their own name or on behalf of third parties, if such activities could affect the main work activity in DEAN TRANSPORT a.s. or interests in the field of competition. Ancillary activities of any kind must not affect the obligations of employees arising from their contractual relationship with our company. Before starting a secondary activity, it is first necessary to notify the management and obtain a permission. The permission will be granted in accordance with the law. Our company welcomes and supports voluntary activities and the social commitment of its own employees in associations and other institutions. However, these must not be in conflict with interests of DEAN TRANSPORT a.s. and to prevent the fulfillment of the obligations arising from the contract relationship.

# 3.2 Significant investments in competitors, customers, suppliers and other business partners

Significant investments or involvement of an employee or close family member (life partner and minor children) in competitors, customers, suppliers and other business partners must not be in competition with DEAN TRANSPORT a.s. or harm its interests. Significant involvement may be considered to be work in statutory bodies and / or equity interests Employees of DEAN TRANSPORT a.s. in any governing bodies competition is not tolerated. Such involvement may lead to a direct conflict of interest. When doubt, it is up to management to decide who is considered a competitor. Acting in the governing bodies of customers, suppliers or other business partners of. DEAN TRANSPORT a.s. is subject to management approval.

#### 3.3 Employment of close persons

Employment of close relatives or close persons of employees DEAN TRANSPORT a.s. is not to prevent our company from creating a risk of conflict of interest. Avoid direct hierarchical relationships to prevent all types of conflicts of interest between relatives or other close persons. Exceptions must be



approved by the company's management. Relatives or other close employees of employees can usually work for customers, suppliers, competitors or partners of our company. In principle, direct business interaction between DEAN TRANSPORT a.s. employees are not permitted and relatives or other close persons who work for our customers or suppliers. In such cases, the employee must not be involved in business decisions.

4. Negotiations with business partners, Customers, suppliers and by third parties

The company DEAN TRANSPORT a.s. promotes fair competition and complies with the provisions governing competition and cartel law. We deal in business relationships with our customers, suppliers and other business partners impeccably. Employees of our company may never, directly or indirectly, accept or provide a bribe. All employees of our company are prohibited from making direct or indirect requests, receiving, offering or providing benefits where they may be in an unacceptable manner influenced by business decisions or if it can only look like it. On behalf of. DEAN TRANSPORT a.s. may not be provided without the consent of management no direct or indirect gifts or contributions to political parties, interest groups, election candidates or officials.

#### 4.1 Relationships with our business partners

The company DEAN TRANSPORT a.s. is honest and fair in cooperation with their business partners. Our persuasiveness is based on our innovative services, our knowledgeable employees, our good service, reliability and fairness. We do not engage in unethical or criminal business practices. We strive to meet the needs and requirements of our business partners.

#### 4.2 Advantages

DEAN TRANSPORT a.s. employees do not draw any profit or other benefit from no trade commenced, negotiated, in progress or terminated, other than their own rewards, salary or approved additional rewards or discounts.

#### 4.3 Contributions from third parties

DEAN TRANSPORT a.s. employees accept gifts, favors, entertainment or other contributions from one person or organization that is involved in our business company, seeks for them or is a competitor, only in certain circumstances. You may accept gifts, favors, entertainment or other contributions only if:

- do not go beyond normal commercial practices,



- they are not of disproportionate and high value and cannot be perceived as a bribe, do not violate applicable laws and ethical principles, and
- will not embarrass our company or employees if they are published.

These rules apply especially when working with suppliers. Participation in business meetings associated with any form of consumption and entertainment third-party actions must be carried out with due restraint. It is used exclusively to establish or improve business relationships. In such cases, the participant should ensure that these expenses are in line with the wording the Income Tax Act.

#### 4.4 Contributions to third parties

DEAN TRANSPORT a.s. employees do not offer any monetary gifts, benefits exchangeable for cash or other contributions to employees of customers, suppliers, competitors or other business partners. Contributions to third parties are only acceptable if are clearly and exclusively intended for the planning, termination and / or execution of business activities are in the normal course of business and have only negligible value. Business gifts should be appropriate to the occasion and the person. The limit of deductible operating expenses is currently CZK 500 net at beneficiary and administrative year with the proviso that the gift must bear the company logo. This will serve for better orientation.

- their donation does not violate laws, state or regional regulations or general ethics principles.

It is prohibited to make gifts or other allowances to public officials or news employees. If in doubt, seek the advice of the company's management.

#### 4.5 Contributions to political parties, politicians or political interest groups

The company DEAN TRANSPORT a.s. provides monetary and in - kind donations to political parties or political interest groups only in exceptional cases and to a very limited extent. These types of gifts are decided by management. It is also forbidden to provide contributions of any kind persons or organizations through which the reputation of the company could be adversely affected.

#### 5. INFORMATION MANAGEMENT

Direct and indirect use of our intellectual property for the personal benefit and to the detriment of DEAN TRANSPORT a.s. is not allowed, namely during and after termination of employment. We protect confidential information from unauthorized use and disclosure. In our social media activities, we are aware of our responsibility for reputation society. We do not disclose trade secrets. We respect the privacy of our colleagues and business partners. In obtaining, processing and using personal data of our employees and business partners applicable laws and regulations. In business negotiations with the authorities, we pay attention to the integrity of our employees. We document our trading with accurate and transparent financial reporting.



# 5.1 Protection of our intellectual property

We consider intellectual property primarily information on business strategies and processes, organizational structures, contracts with business partners, internal results, personal data and contacts. The company also owns other intellectual work products, such as business ideas, which arise in the course of the activity. Protecting our intellectual property is essential for us. Each of us must protect confidential information against unauthorized use and disclosure. Employees whose tasks include handling confidential information must maintain confidentiality to a particularly high degree. This also applies to negotiations with colleagues. Unauthorized disclosure of confidential information to the public or to third parties such as competitors, for example, we consider a breach of trust that we will not tolerate. The obligation to protect our intellectual property applies even after termination of employment.

#### 5.2 Action on social media

The company DEAN TRANSPORT a.s. is committed to mutual respect and equality treatment.

We distance ourselves from all types of radical, racist or shameful statements that employees of our company can express or disseminate on social networks. We do not tolerate the expression or dissemination of derogatory criticism, insults or defamatory statements employees to colleagues, superiors or our company on social networks. Information on social networks spreads quickly and almost uncontrollably. Once published, it is difficult to completely remove it from the Internet. Each of us must carefully verify how it presents itself and whether its information is accurate.

# 5.3 Protection of personal data

Careful handling of personal data of our employees and business partners is for us highest priority. We express our respect for other people and thus create a basis for credible cooperation. As part of our responsibilities, each of us has a responsibility to ensure the continued protection of individuals data. We collect, process and process personal data of our employees and business partners we use only on the basis of legal regulations. We use confidential information obtained from business partners exclusively for the intended purpose. We expect our business partners to treat ours in the same way confidential information.



# 5.4 Relationship with authorities

In business negotiations with the authorities, we pay attention to the integrity of our employees. All information provided to the authorities must be true and correct. Requests from authorities, such as requests for information, are processed in accordance with applicable regulations.

## 5.5 Financial reporting

The accuracy, precision and reliability of our financial reporting determines our credibility. Effective control systems ensure that financial reporting results are sound basis for important business strategic decisions. All employees whose job includes accounting and financial reporting are responsible for ensuring that financial reporting is honest, correct and timely. It is forbidden to manipulate financial reporting in any way.

# 6. COMPLIANCE WITH THE RULES OF THE CODE OF ETHICS

The rules of conduct are binding for all employees of DEAN TRANSPORT a.s. Adherence to the rules of conduct will only be successful if we strive for it together. Suspected violations of the rules of this Code of Ethics can be reported to the company's management. All requests, questions and concerns related to the above code of ethics and its non-compliance can be communicated to the company's management. The company's management will take these suggestions very seriously and will treat them confidentially. Violation of the code of ethics may have labor law consequences, or it may lead to in some cases also for investigations outside the company, civil law or criminal proceedings.