



The DPD Polska Code of Ethics and Values



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We are creating a friendly working environment that encourages the continuous development of our people. We are helping our Customers grow by providing them with multichannel logistics solutions and the best quality after-sales service. We provide the Recipients of our parcels with comfort, excellent consumer experience resulting from well-thought-out delivery management tools, and smile at every point of contact with our company.

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We are responsible professionals who take the initiative and anticipate challenges before they happen. As a company, we are creating a friendly working environment encouraging the continuous development of our people. We are helping our Customers grow by providing them with multichannel logistics solutions and the best quality after-sales service.

We provide the Recipients of our parcels with comfort, excellent consumer experience resulting from well-thought-out delivery management tools, and smile at every point of contact with our company.

We want to fulfil these tasks on the basis of high ethical standards included in this Code, adopted by Employees, Associates, and Managers, and signed by the Management Board. Managers and the Company's Management Board shall be obliged to empower compliance with the provisions of the DPD Polska Code of Ethics and Values through:

1. Leadership by example

Presenting, by way of example, the proper conduct and expressions that confirm the ethical course of action.

2. Dissemination of knowledge

Ensuring that Employees and Associates are familiar with and understand the Code of Ethics and know how to report irregularities.

3. Empowerment

Empowering positive and ethical conduct among Employees and Associates.

4. Trust building

Building an atmosphere of trust and openness to share information about irregularities and potential violations of the Code of Ethics.

5. Vigilance

Responding to any breach of the Code of Ethics so that an adequate response can take place as soon as possible.



Rafał Nawłoka

President
of the Management Board



Henryk Czyż

Vice President of the
Management Board,
Chief Financial Officer



Maciej Głowacki

Chief Operating Officer



Monika Kowalska

Quality, Safety, and
Administration Director



**Marta Westrych-
Andrzejczyk**

HR Director



Tomasz Szalewicz

IT & Strategic Projects Director



Łukasz Zembowicz

Sales and Marketing Director



1. Customers and our services

1. The main objective of our activities is the Customer, its needs and satisfaction with the cooperation with the DPD Polska Capital Group.
2. We want to treat our Customers as Business Partners, based on fair communication and fair compliance.
3. By listening to our Customers and observing market trends, we are trying to shape our product and service offerings so that, on the one hand, they meet their expectations, and, on the other hand, they ensure the profitability of the contracts signed.
4. When conducting commercial negotiations, we provide Customers with clear, transparent and comprehensive information so that they can know what range of services they can expect from standard services.
5. We do not make unrealistic promises. We aim to deliver flexible solutions on the basis of existing services with a guarantee that they will be performed in the highest standard.

Respect for Customers is shown by:

1. Compliance with the terms and conditions of cooperation.
2. Actively informing about possible challenges and obstacles to the delivery of the services.
3. Showing initiative in addressing problems.
4. Meeting deadlines.
5. Responding to emails and phone calls in a timely manner.
6. Ensuring polite communication based on correct information

We provide appropriate treatment, security and comprehensive monitoring for parcels entrusted to us by Customers at every stage of transport.

We treat all information provided by Customers and Suppliers in the course of our services and tasks as confidential.

In accordance with the law, we keep confidential all personal data of our Customers.

The high quality of services is derived by the DPD Polska Capital Group from professional standards of operation of all divisions of our company.

When dealing with both corporate Customers and individual consumers, we want to be an expert in parcel delivery and a trusted Business Partner.



As part of implementing our group policy of “close relations” related to building the best possible relations with our Customers, we have made four basic commitments:

We care about our Customers, not only about their packages



We anticipate challenges and act efficiently to meet them



We recognise and respond to Customers' needs



Our Customers' satisfaction and smile are most important to us



Examples of the desired conduct include:



- Ensuring high quality contact with the Customer, responding appropriately to emails and phone calls.
- Proposing solutions that are both tailored to the Customer's needs and optimal for the company.
- Taking care of the Customer's package at every stage of the delivery process.

Examples of unacceptable conduct include, but are not limited to:



- Providing false information to Customers.
- Using offensive or crude language when communicating with Customers.
- Destroying or opening our Customers' packages.





2. Employment policy and occupational safety

1. We comply with the requirements of Polish labour law.
2. All Employees of our company have written agreements specifying their position and terms and conditions of employment.
3. In all aspects of employment, recruitment, payroll and benefits, providing training, promotions, transfers, and terminations of employment, we treat Employees fairly, taking into account their ability, meeting the requirements and standards of their position.
4. We respect the rights of our Employees, and we strive to create an open, non-discriminatory and well-received workplace.
5. All available posts that are publicly announced shall be subject to an open and transparent selection and recruitment procedure. Discrimination in any aspect of employment on the grounds of race, religion, nationality, disability, sexual orientation, political opinion, trade union membership, gender, marital status, or age shall not be allowed.
6. In our organisation, we do not tolerate any signs of nepotism. Relatives and friends may only be employed on transparent, fair and ethical principles, and must be communicated to the Superior.
7. All of our Employees have the right to expect their superiors to behave fairly and respectfully towards them and in accordance with the ethical principles.
8. We improve the competences of our Employees through training and implementation of individual development plans.
9. We share our knowledge and experience with our Business Partners, especially emphasising the security issues, the improvement of key competences for organisations, and the quality of our services.

10. We respect human rights and do not employ minors. Any person working with or cooperating with DPD fulfils the lawful conditions for legal residence and gainful employment. We do not accept any form of illegal employment by the company or by our Business Partners.
11. We make every effort to create a safe and healthy working environment to encourage cooperation between the best Candidates and Partners, to minimise the number of accidents at work and absences, and to improve the effectiveness of our company's operations. This includes workplace safety, physical and mental health, and social conditions for Employees, Associates, Customers or Suppliers.
12. All Employees and Associates shall undergo appropriate occupational health and safety training, shall receive appropriate instructions to ensure that tasks are performed in accordance with applicable laws and procedures, and shall have working tools in place that meet the necessary safety standards.
13. All Employees, Associates and others who come into contact with us are responsible for complying with safety principles and recommendations.
14. All superiors are responsible for ensuring the correct operation of any processes and systems affecting occupational safety.
15. The anti-nicotine policy has been implemented at all premises of the DPD Polska Capital Group and applies to all staff and visitors. Suitable locations have been prepared for smokers in accordance with occupational health and safety requirements.





Examples of proper conduct include:



- Conducting transparent recruitment processes, where the hiring decision results from a positive assessment of the candidate's competencies and experience.
- Conducting inspections, audits and other means used to investigate and ensure that Company's Suppliers, Subcontractors, Partners and Customers do not violate human rights, and comply with the law.
- Refusing to cooperate with parties who do not respect these rights.
- Complying with occupational health and safety principles.
- Ensuring the safety and quality of the equipment and protective clothing used for work.
- Treating Employees and Associates with respect, regardless of their gender, religion, age or nationality.
- Communicating to the Ethics Officer any information on violations of the principles of the Code of Ethics, social coexistence, law, security principles, etc.

Examples of unacceptable conduct:



- Working or coming into work under the influence of any psychoactive substance, such as alcohol or drugs.
- Failing to comply with occupational health and safety principles, lack of protective clothing where it is required.
- Establishing cooperation with Business Partners that do not respect human rights, employment or occupational health and safety regulations.
- Discrimination on grounds of gender, nationality, religion, etc.





3. Conflict of Interest

1. None of the Employees or Associates may engage in activities which are in conflict with or compete with the employment of our company, or which could harm the interests of the DPD Polska Capital Group.
2. All Employees shall undergo the appropriate training in the prevention and management of conflicts of interest and shall read the relevant procedure on this subject and comply with its provisions.
3. Employees in defined positions are required to submit a declaration of conflict of interest on an annual basis.
4. Each Employee is required to make a declaration as soon as a potential or actual conflict of interest arises in their case.
5. The Superior, after a possible consultation with the Ethics Officer, is obliged to propose a solution eliminating the existence of a conflict of interest, provided that this does not lead to negative consequences for the Employee.
6. Employees may not use employment in the DPD Polska Capital Group to obtain personal and/or material benefits exceeding or inconsistent with the agreement binding upon them with the DPD Polska Capital Group.
7. Purchases of goods and IT services, legal services, etc. for our company are made on the basis of a tender process. Any cases of corruption or other fraud in this field shall not be tolerated.
8. All Employees are obliged to disclose in writing their relationships concerning, among others, managerial responsibilities, membership of supervisory boards and conducting other business activities in any organisation/entity in the case of which a conflict of interest could arise.
9. Employees are also obliged to disclose associations of family members, friends, close friends with activities that could give rise to suspicion.



10. If the activities of the company in which the Employee or Associate is additionally employed may create a conflict of interest with respect to the work in the DPD Polska Capital Group, the Employee shall be obliged to inform their Superior or the Ethics Officer thereof.
11. Each Employee must clearly separate initiatives on their own behalf, both private and public, from actions carried out on behalf of the Company. Employees may not use company letterhead, funds, and other company property for private ventures.
12. The Company does not support or finance political activities in any way.

Examples of proper conduct include:



- Avoiding situations where the personal involvement of a self-employed person or a family member is linked to decisions to cooperate with a given Business partner.
- Raising concerns with your superior and/or Ethics Officer regarding the existence/emergence of a potential conflict of interest.
- Avoiding expression of private political views in professional situations.

Examples of unacceptable conduct:



- Selecting a Supplier based on the desire to obtain personal benefits for oneself or family members.
- Using confidential information for personal benefit.
- Making false declarations of conflict of interest.



4. Legal and financial standards and data protection

1. Our business is conducted in accordance with applicable laws.
2. We regularly audit our activities by independent institutions in the field of financial statements and by specialised external and internal audits.
3. The Act on Anti-Money Laundering and Counteracting the Financing of Terrorism applicable in Poland indicates the authorities and entities functioning within this system and specifies their duties and powers. DPD Polska is subject to the provisions of this Act, also as regards the provision of obligatory trainings.
4. When performing the Company's tasks, all Employees reasonably manage their funds and care for the property entrusted to them.
5. Transparency of our financial decisions is ensured by the procedures set out in the form of approved written instructions.
6. The activities of the DPD Polska Capital Group are subject to strict registration in the official document collection and circulation system.
7. We respect the compliance of our trade operations with international standards, recommendations, relevant practices, and sanctions imposed on States, entities and persons that violate international law or threaten the national interests or security of States.
8. We care about the security of the shared personal data, in particular its protection against unauthorised access. We ensure that all registered users exercise their rights under the Act of 10 May 2018 on Personal Data Protection and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
9. We have the necessary processes and tools to protect our IT systems.
10. Our company uses only licensed computer software. Computer passwords are confidential and assigned individually to individual users of IT systems.

Examples of proper conduct



- Securing access to confidential data which constitutes a trade secret.
- Appropriate and responsible handling of the entrusted personal data in accordance with the subject matter and time of the processing.
- Securing access to information and systems by blocking computers when we interrupt work.

Examples of unacceptable conduct:



- Leaving an unsecured computer or company documents in a manner that enables third parties to access them.
- Destroying company documents that should be archived accordingly.
- Failing to understand and comply with internal company procedures and regulations.
- Conducting business interviews, the content of which may contain confidential information, in areas such as lifts, restaurants and public transport.
- Posting passwords to computer and in-house systems in places where they can be easily read by unauthorised persons.
- Using company equipment for purposes that contravene the principles described in the Code.





5. Organisational culture

1. Our organisational culture is based on the following values: People, Development, Quality, Responsibility, Involvement. Furthermore, respect, kindness, cooperation, open communication and inclusivity are important to us.
2. We want to promote a dialogue in which we provide information and listen carefully to our Employees and Associates.
3. The principles of ethics, social coexistence and all social norms shall be observed by all Employees, especially Superiors, whose duty is to lead by example.
4. We want to ensure a work environment in which every Employee can work in conditions that promote a level playing field and prevent any discriminatory practice.
5. We are open to the diversity of our Employees and Associates by ensuring a level playing field, while supporting mutual cooperation.
6. We do not tolerate any form of discrimination, harassment, whether moral or sexual, or any conduct that may constitute harassment. All our Employees are subject to the principles of professional courtesy in external and internal contacts. These principles also apply to conducting phone calls, since this is the way we highlight our company's culture and professionalism. We care for the proper use of social media by performing adequate activities on social networks, managing the company's profiles, and monitoring the information contained therein.
7. The external appearance of an Employee and an Associate, as part of our company's image, should always be neat, well-groomed and encouraging professional contact.
8. We want to create an incentive to work in teams at all levels and to share information about the company's day-to-day affairs.
9. Each Employee and Associate, upon observing any irregularities, infringements of laws, procedures, principles, and regulations, may report them on the www.safecall.co.uk/en/customers/dpdpoland/ platform or at the toll-free number: 00 800 7233 2255
10. We believe that the value and strength of our company is the result of the wisdom and creativity within each of us, and therefore we want to encourage: sharing knowledge and experience, being innovative, and improving our working environment.
11. We respect the right of our Employees to rest. As a company, we promote solutions that promote a work-life balance. We restrict telephone and electronic communications after business hours.

Examples of proper conduct include:



- Treating everyone (Employees, Associates, Customers) with respect.
- Caring for a good working environment, showing a friendly attitude towards Associates.
- Limitation of business phone calls after business hours to critical situations.
- Caring for the company's image on social media, among other things by avoiding sharing controversial content thereon.

An example of misconduct is:



- Any form of violence, discrimination.
- Exerting pressure on Employees and Associates to make them available by e-mail or telephone after working hours, where the nature of the work does not require it.
- Conducting meetings with Customers in an inappropriate outfit. Flip-flops, sandals, T-shirts, or shorts are not proper clothes for meetings with a counterparty.



6. Couriers and Carriers

1. We provide our Couriers and Carriers with reliable terms and conditions of cooperation, support, training, and clear remuneration principles so that the DPD Polska Capital Group is a friendly Partner in their own business activities.
2. Through daily contact with Customers, Couriers and Carriers who cooperate with us are the most crucial point of service and a live business card of the DPD Polska Capital Group. Their conduct and manner of providing the services should reflect the highest quality standard and care of the Customer.
3. Actions taken by Couriers and Carriers of the DPD Polska Capital Group shall be guided primarily by the desire to ensure the highest quality of services for the Customer under the applicable procedures, in particular by compliance with the following principles:
 - Ensuring timely receipt and parcel delivery at the indicated address, respecting integrity of parcels.
 - Providing true information about the delivery status.
 - Propriety in conduct and communication.
4. Couriers and Carriers of the DPD Polska Capital Group, when providing services in company uniforms and labelled vehicles, represent our brand also by participating in road traffic, where they should always comply with the applicable laws, as well as by respecting the general principles of social coexistence.
5. Couriers or Carriers may be liable for a breach of the Code of Ethics under civil law arising from their agreements concluded with DPD Polska and from other generally applicable laws.

Examples of proper action in this area include:

- Complying with established standards concerning the quality of delivery and contact with the Customer, dress code, as well as the appearance and technical condition of the vehicle.
- Knowing the procedures and regulations, preceded by attendance at designated mandatory trainings.

Examples of improper conduct include, but are not limited to:

- Failing to observe traffic regulations: parking in unauthorised areas, speeding, breaking bans etc.
- Leaving information about our Customers, e.g. in the form of waybills, in places where they can be accessed by bystanders, e.g. behind the vehicle's windshield.

7. Social responsibility and environmental protection

1. Our company pursues a sustainable development policy. This means that, as a company in the logistics industry, we feel obliged to build our success while respecting three main pillars: our Employees, Associates, the environment, and the Community in which we operate.
2. We want to protect the environment by preventing pollution and CO₂ emissions, waste management, saving paper and energy, and raising the awareness of our Employees and Associates in this regard.
3. We are committed to the belief that if a company draws on local resources to grow, it should return something to the local community in order to balance it. Our company and each individual Employee are willing to get involved in social and charitable activities, especially where the nature of the work we perform on a daily basis may be helpful. We respond to social needs and crisis situations.
4. Since we all share the same address – Earth – we have a duty to respect and protect our planet, and to work together to tackle numerous environmental challenges, such as combatting air pollution, climate change, destruction of biodiversity, etc.
5. Our Driving Change™ programme focuses on four priorities:
 - Measuring, limiting and offsetting of our carbon footprint.
 - Contributing to improvement of the quality of life in cities through the implementation of air quality measurement networks.
 - Supporting an economy based on using reusable products and promoting their reuse.
 - Assisting and supporting local organisations.

Examples of proper conduct in this area include:

- Segregating waste and saving water and energy (closing the tap, switching the lights and other devices off when we do not use them).
- Getting involved in support activities for local communities.

Examples of improper conduct include:

- Unnecessary or excessive printing of materials, documents.




8. Zero tolerance for corruption, fair competition


1. Our company adheres to the principles of fair competition, prevention of bribery, illegal payments and corruption.
2. Employees and Associates of the DPD Polska Capital Group are obliged to avoid activities leading to a conflict of interest.
3. Employees and Associates of the DPD Polska Capital Group may not offer to or receive from Customers, government officials or representatives of political parties any profits of corruption or illegal benefits in order to conclude, preserve transactions, or obtain other favourable decisions.
4. Employees of the DPD Polska Capital Group may not enjoy any profits or help to derive profits from the opportunities that may arise as a result of using any information or position in the company.
5. Employees of the DPD Polska Capital Group are also obliged to comply with the principles of fair competition, including, among others, anti-trust laws which contain a prohibition of anti-competitive agreements and a prohibition of abuse of a dominant position. As a matter of fair play towards our competitors, data relating to a competitive offer should never be discussed with the competing party.
6. It is prohibited to restrict free competition by price fixing market sharing, etc. with any competing party.
7. It is prohibited to engage in espionage or encourage espionage through attempted bribery.
8. Employees and Associates of the DPD Polska Capital Group shall provide Customers with truthful information and fairly represent the quality and availability of the offered services.



9. Employees and Associates of the DPD Polska Capital Group are obliged to comply with three key principles consistent with the Anti-Corruption Policy of the La Poste Group, i.e. "Zero tolerance", "Applies to everyone", "Everyone is vigilant".
10. Employees and Associates are free to participate in public and political life in their communities, but such involvement must take place outside working hours without using the company's resources.
11. The principles of receiving and donating gifts or entertainment are strictly governed by the procedure. Employees are obliged to acquaint themselves with the document and apply it to its provisions. The guidelines contained in the procedure lay down, among others, the principles of reporting and recording gifts and entertainment expenses.

Proper conduct in this case will include, for example: 

- Reporting all bribery attempts experienced.
- Informing the superior about the received gift, invitation to an event, lunch, dinner with the business partner in accordance with the provisions of the Gifts and Entertainment Procedure.

Examples of unacceptable conduct include, but are not limited to: 

- Communicating any confidential information to unauthorised parties.
- Attempting to bribe.
- Concluding price fixing agreements.



9. Principles of responding to breaches of the Code of Ethics

1. We conduct our business transparently and ethically, and we are committed to preventing any abuse or violation of applicable laws.
2. Each Employee is obliged to act ethically and be proactive in response to any discovered manifestation of unethical conduct.
3. To that end, an institution of the Ethics Officer has been created. This role is performed by the HR Business Partnership Director. The person in this role guarantees impartiality and fair treatment and performs a consultancy and advisory function for all Employees of the company.
4. If you observe any conduct that is unethical, illegal or may give rise to a potential conflict of interest, you should contact the Ethics Officer in good faith via email: **rzeczniketyki@dpd.com.pl** or by phone at **+48 502 777 227** or via the platform **www.safecall.co.uk/en/clients/dpdpoland/** or at the toll-free number: 00 800 7233 2255.
5. No Employee shall be penalised for reporting irregularities if they acted in good faith and without intent to cause damage to the DPD Polska or GeoPost Capital Group, the business unit concerned, Employees and Associates and/or a third party.
6. Each Employee or Associate who has reported a case shall be immediately informed of the actions taken to process the report.



7. The identity of the person reporting the incident should remain confidential, also at the stage of case analysis with experts. Any disclosure of identity may be made only with the prior consent of the person concerned. In accordance with the personal data protection laws, the person reporting the incident and other persons whose data arise in connection with the incident have the right to access their data and the right to request its rectification, erasure or restriction of its processing, the right to data portability, and the right to lodge a complaint with the Data Protection Officer responsible for personal data protection in DPD.
8. The person reporting the incident, who has shown the courage to be a guardian of our values and ethical conduct, will not suffer any consequences or backlash from DPD. All persons have the right to expect the Ethics Officer to provide assistance and support in relation to enquiries submitted by e-mail, and to respond to the reports.
9. In each case, a breach of the principles of the Code of Ethics requires a response and communication in a business interview of the lack of acceptance of reprehensible actions. Any violation of applicable laws, procedures and adopted principles shall result in the initiation of an investigation and the application of sanctions provided for in the normative acts, if confirmed.
10. Employees may be penalised for a breach of the Code of Ethics within the scope regulated by labour law through sanctions provided for in the Labour Code and the work regulations.
11. Confirmed breaches of ethical principles not sanctioned by law may result in internal sanctions according to the type of agreement between the parties.

Do you see violations of the law at work?

Report them to your direct superior,
the Ethics Officer, or contact Safecall.

00 800 7233 2255

toll-free call

You can also report it online at:

<https://www.safecall.co.uk/en/clients/dpdpoland/>

All calls are treated confidentially by Safecall and if you want, you can remain anonymous.

Declare what you consider objectionable in terms of:



Safecall shall not be used to report:

- complaints
- quality and timeliness of parcel delivery
- duly performed service



Independent service provider
cooperating with







Values of DPD Polska

Our mission is supported by the following values developed with DPD Polska Employees:

1. QUALITY

Together, we provide the highest quality to build trust and a sense of security for our Customers.

2. RESPONSIBILITY

We share responsibility for the commitments made, we are honest, and we always tell the truth.

3. DEVELOPMENT

We are constantly improving standards of our activity to keep pace with the needs of our Customers.

4. PEOPLE

We build partnerships between each other and with Customers – we listen, provide clear information and offer support.

5. INVOLVEMENT

Every day, we are committed to the goals of our company, we are consistent, and we are not afraid of failure.



Development

Involvement

Quality

Responsibility

People





NETWORK
MEMBER OF

