

**DIDWW**

# Code of Conduct

Dear employees,

When a company continues to grow and work towards achieving its goals, it is important that we operate with integrity and follow the highest ethical standards in all of our business operations.

As CEO, I am honored to manage a team of hardworking professionals that are dedicated to innovation, integrity, and our customers' success. We seek to provide an environment in which everyone feels appreciated, respected, and empowered to share their unique talents and ideas.

Our code of conduct is a living document that represents the concepts and values that define our company operations and acts as a guide for how we behave ourselves both within and outside the workplace.

We truly believe that by incorporating these principles into our everyday work, we can build a successful organization that is committed to the success of our clients. Thank you for your devotion to our company's purpose and commitment to our shared values.



Sincerely,  
Lina Zaboras

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# Introduction

DIDWW Code of Conduct is one of the ways DIDWW puts its values into practice. This Code defines the mission of the company, its principles, and their interrelation with the standards of professional conduct.

The Code's mission is to empower and encourage employees to act honestly, comply with ethical norms, uphold the company's values, and preserve our reputation. Laws, regulations, and all other related standards that apply to our company should be respected and complied with. Employees should also seek guidance about whom to approach with any of their concerns asking for help or advice when needed, and maintaining their top performance every day.

This Code is meant to reinforce ethical and transparent processes when managing the affairs of the company. Every employee is expected to read, understand, and uphold this Code of Conduct to make appropriate and confident decisions.







We are responsible for immediately notifying the Legal Department of any actual or potential violations of laws or rules concerning employees, customers, and partners.

Employees should feel free and comfortable raising any integrity concerns, even if they are not yet sure they have all the details about the misbehavior of any sort.

We encourage trust and assure that all matters will be handled anonymously, fairly, and promptly. Appropriate actions will be taken in response to all reported concerns, once they have been investigated and validated.

This Code also acknowledges that employees are a part of the company and have their own rights within it. Expressing concerns regarding terms and conditions of employment or any other inquiry is highly encouraged and defined as freedom of speech. Employees have all legally granted rights, and nothing in this Code or any other company's policy is intended to limit them in any way.

# Serve our customers

We believe that the relationship with a customer shapes the future of the company, so we try to keep a high standard to understand their profoundest needs, offer the best solutions for their businesses, and give the best customer experience based on honestly assessing their challenges.

Our customers are our top priority, and their satisfaction drives us to uphold our principles and maintain high standards.





## Helping customers succeed

We believe success is achieved through perseverance and constant striving for excellence. We consistently challenge ourselves by introducing innovative concepts and addressing challenges, and we continually seek new methods to reduce costs and boost service quality for the benefit of our customers.

## Continuous improvement and innovation

Always finding new ways and solutions for our products and services is one of the unique qualities of the company. It is important for us to always move forward, to offer the best quality, and to be innovative not only about the inventions or tools we use but also to constantly improve the internal processes by implementing the newest trends and innovations.

## Employees define DIDWW's future

We value the diversity of our workforce and adhere to the principle of treating others as we would like to be treated. We embrace and take responsibility for our actions, and we aim to be role models for others. Employees are the heart of our business, and we serve them with the utmost care and respect.

## Integrity

Every day, in every way, and by every individual in our organization, we are committed to performing with integrity. This means conducting our dealings with each other, our customers, and suppliers fearlessly and respectfully, meeting our commitments, and complying with laws and regulations. It is very important for us to have the trust of our customers and our partners.

# Trust and respect (for) each other

We build relationships based on mutual respect to create a community of trust. We all must strive to foster an environment in which our values of trust and respect guide us toward achieving our common goals and mission. Intimidating, unprofessional, abusive, or offensive language and conduct are unacceptable under any circumstances. To that end, DIDWW applies these principles to the workforce on a daily basis:



## Trust

DIDWW sets a tone of trust, underscoring its importance to integrity and reliability. It is a fundamental ingredient of human relationships that allows us to achieve more as a team.



## Respect

DIDWW cultivates an environment of respect and courtesy for everyone, including customers, partners, suppliers, and all members of our company.



## Be kind

DIDWW strives to ensure that every individual is treated with fairness and kindness in all aspects.



## Growing

DIDWW builds and supports an environment of growth for everybody. Our employees adeptly navigate constant changes, embrace challenges, and learn new things every day with confidence and poise.



## Positivity

We value this powerful tool our team uses to achieve goals and success.

## Workplace ethics and guidelines

### 1. Human rights and labor law

DIDWW is committed to full compliance with all applicable local labor and employment laws and regulations. This commitment includes, but is not limited to, policies related to remuneration, fair hiring practices, equal employment opportunities, freedom of association, collective bargaining, and the payment of fair and competitive wages as mandated by local laws and regulations.

#### We unequivocally prohibit:

- The use of child labor;
- The use of forced or compulsory labor;
- Any form of modern slavery;
- Human trafficking;
- The employment of unauthorized foreign labor.

DIDWW will not engage in business relationships with any co-venturers, contractors, suppliers, resellers, distributors, consultants, or agents who participate in these prohibited activities.







## 2. Foster diversity and inclusion

We are stronger because of our differences, not in spite of them. We believe that we best serve others and enrich ourselves through the diverse skills, experiences, and backgrounds that each of us brings to the company. DIDWW strongly believes that diverse perspectives enhance our staff, company processes, progress, and value to our customers. We believe in the power of diversity.

## 3. Equal opportunity employment

Employment at DIDWW is based on individual qualifications and relevant professional competencies. The company provides equal employment opportunities to everyone.



## 4. Harassment and discrimination

DIDWW is committed to providing safe, inclusive, and respectful workplaces free from discrimination and harassment. We do not discriminate on the grounds of race, pregnancy, color, sexual orientation, gender, gender identity, creed, age, disability, marital status, military service status, citizenship, or any other category protected by the law.

Respect for one another includes avoiding harassing or disrespectful behavior in any way, whether spoken, written, physical, or visual. Harassment, including sexual harassment, is strictly prohibited, and we do not tolerate it. Any adverse action taken based on these categories is a violation of our policies and our Code.

## 5. Drug and alcohol

At DIDWW, our employees' well-being is paramount. Upon joining, each member is briefed on our internal policies pertaining to drug, alcohol, and smoking. For the welfare of our team, the use of any substance, legal or illegal, that might impede job performance is strictly prohibited. Likewise, the manufacturing, distribution, or possession of drugs or suspicious substances at the workplace is forbidden. Our goal is to foster a work environment conducive to peak performance for every team member.







## 6. Safe and healthy workplace

Everyone deserves a positive and safe working environment. Recognizing this, DIDWW ensures workplace safety and provides modern, innovative tools, all while cultivating a warm and friendly atmosphere. A safe and positive workplace not only benefits our team's well-being but also sets the tone for the entire company.

## 7. Environmentally friendly

DIDWW is committed to reducing its environmental footprint. We support and participate in eco-friendly initiatives, such as recycling, reducing paper usage, and incorporating sustainable resources in our operations. Moreover, our team is encouraged to engage in community-driven activities like cleaning local areas, forest conservation, and tree planting. By adopting these practices, we aim to give back to the planet, making it a better place for everyone.



## 8. Sharing responsibility

DIDWW encourages a culture of collective ownership. Employees are empowered to take the reins in decision-making, ensuring that each choice aligns with both the company's and customer's best interests. Our aim is to provide an environment where open dialogue is the norm, covering all facets of decision-making and continual improvement.

## 9. Professional development

From day one, DIDWW is invested in its employees' growth. We allocate resources, time, and industry-best practices to bolster their professional journey. Our team members are continually encouraged to embrace creativity, adaptability, and learning. DIDWW provides a range of opportunities, both within the company and externally, to support our employees' curiosity and drive for innovation. We believe that personal growth and professional development go hand in hand.







## 10. Life work balance

Working at DIDWW feels like being part of a close family, extending beyond the people we see every day to include their loved ones as well. The company understands the value of time and pays attention to the boundaries between enjoying the work, giving productive results, and spending time with loved ones. The company values focus on employees' families and children, evident in our mutual celebrations, events, and especially our child-oriented policies. We believe that the foundation of our successful company is a happy family.

## 11. Pet friendly

Research has shown that having pets in the workplace can reduce stress, improve heart health, and combat feelings of loneliness. Indeed, our workdays seem more lively and productive when our pets accompany us. Even employees without pets have noticed that these days feel brighter and more upbeat.

# Avoid conflicts of interest

DIDWW views a conflict of interest as a situation where an employee's actions, or the appearance of their actions, favor personal interests over those of the company. As part of the DIDWW team, it's within our power to prevent or mitigate potential harm to the company's reputation. To this end, DIDWW provides guidance to ensure business decisions prioritize the company's interests.

All employees are encouraged to steer clear of situations that could lead to actual or perceived conflicts of interest. To assist in recognizing potential conflicts, the company highlights specific areas of concern. If uncertain about a particular business situation that might present a conflict of interest, employees are urged to seek guidance from the Legal Department.

## 1. Personal relationships

It is understandable that having a personal relationship (married, dating, cohabiting, family or relative relationship, etc.) with another applicant or employee of DIDWW may lead to a conflict of interests; occasionally, the relationship may influence or appear to influence certain decisions. If employees enter into such relationships it is necessary to inform the HR department to ensure transparency. Any information shared will be treated strictly confidentially.

## 2. Outside employment, inventions, and business opportunities

Employees are expected to keep their outside business activities completely separate from employment at DIDWW, and management should be notified in writing prior to the initiation of any initiatives, inventions, or other opportunities associated with the field in which an individual is employed.

To protect sensitive company data, employees are expressly forbidden from being externally employed by other organizations that operate in the same industry and adhere to the same standards as DIDWW.

Additionally, any material inside information that could impact the trading of securities must be kept strictly confidential. Business development opportunities discovered through your efforts while employed at DIDWW are considered the property of the company.





### 3. Personal investments

Our personal financial investments should not influence our independent judgment on behalf of DIDWW, therefore, we strongly advise against personal investments in companies engaged in partnerships or competition if such investments could potentially influence or give the impression of influencing to act in a manner that could be detrimental to DIDWW.

Investments that might influence business decisions can lead to conflicts of interest. If you are uncertain or believe there is a conflict, please seek guidance with our legal department, which stands ready to assist in resolving the matter promptly.

### 4. Accepting gifts

DIDWW fosters fair and professional behavior and encourages transparency inside and outside the company. Employees may provide or accept modestly valued gifts typical in business operations, as long as they comply with relevant laws and do not influence decisions. Cash gifts are strictly prohibited. Inside gifts among employees are not considered business gifts and are thus treated differently.

### 5. Ethical and fair competition

We strive to build trustworthy relationships with our clients and partners by providing the highest quality products and services. All competitive information must be obtained legally and ethically, without any unlawful restraint of competition.



# Confidentiality

## 1. Confidential information

Confidential information includes all proprietary and/or restricted information or material related to the business. Including, but not limited to, network rates, capabilities, POP locations, services, customer information, business associates, marketing plans, operational descriptions, revenue, pricing, trade secrets, strategies, or product information, data prototypes, product designs, equipment, computer programs, and software, including, but not limited to, code, software output and interfaces, formulas, data, inventions, innovations, developments, processes, techniques, and third-party confidential information. One of the most important duties of our company is to protect data. DIDWW takes all the necessary measures against the inadvertent or intentional disclosure of confidential information.

## 2. Company data protection

Keeping personal information secure is one of DIDWW's strongest commitments. It is our responsibility to follow and comply with the Law of Ireland and meet the requirements of the EU General Data Protection Regulation (GDPR) and other applicable personal data-related laws and regulations in the countries we operate. We are committed to our responsibilities towards customers, partners, and employees, and we only process personal information for legitimate business reasons. We assure that personal data is being properly protected from possible loss, misuse, or disclosure to third parties.

We have developed rigorous procedures and systems to ensure a safe process for confidential information and to maintain a high level of security that protects and guarantees the confidentiality, integrity, and usability of such information.

We use appropriate administrative and technical safeguards to protect customer data in compliance with the laws, regulations, and our data protection and security policies.

## 3. Former employees

Every member of our team, both current and former employees, must uphold the contractual obligations to handle confidential information appropriately.

DIDWW obligation to preserve confidential information continues both during and after employment with the company, whether this information is our intellectual property or the property of our partners, customers, governmental authorities, or any other third party.

# Protection of DIDWW assets

Given the specific nature of our business activities and current cyber market trends, the company's main focus lies in adhering to proper security practices.

We use the company's property to conduct business in compliance with the applicable policies. At DIDWW we manage two types of assets: physical and digital. Physical resources like equipment, inventory, and building access chips are entrusted to employees to support their daily tasks. Electronic assets, including computers, mobile devices, software, and hardware, are critical assets for our daily operations, processes, and procedures. Very high security standards and practices are applied to prevent misuse, unauthorized use, or any unauthorized access to DIDWW facilities.

## 1. Company equipment

DIDWW employees should take proper care of the equipment and materials provided by the company and use them responsibly, for company use only. Employees are fully aware of the risks, responsibilities, and liabilities, particularly the need to stay alert and protect the company's assets while working outside the office. Occasional personal usage is permissible as long as it does not affect job performance, interfere with the business, or cause any expense to the company.





## 2. Intellectual property

Every business contains information considered confidential – information related to our customers and suppliers, services, operations, strategies, marketing plans, trade secrets, data prototypes, know-how, brands, trademarks, equipment, software, formulas, inventions, developments, innovations, etc. It's vital to keep this information confidential, comply with the laws, and encourage others to do the same.

Trading on inside information is prohibited and against the law. All DIDWW property and assets are used for legitimate business reasons only and are secured against illegal use. These assets should never be used for personal gain, fraudulent purposes, or in any other unauthorized manner. Our company's intellectual property and business information are among our most valuable assets and are treated with the utmost respect and care. The confidential information of our customers and business partners is considered equally important. DIDWW refrains from using copyrighted data without proper licensing or authorization and does not misuse third-party intellectual property.

## 3. The network

The company understands the importance of maintaining the highest security standards to protect the company's network, customers, other third parties, and their information. Periodical security training, measurements, and other methods are implemented to maintain the safety and reliability of the staff.

DIDWW makes the best effort to keep the employees well informed about the security policies. If there is a possibility that network passwords or any other information may be compromised, that network security may be violated in any way, or that equipment is lost, staff are encouraged to take prompt action by reporting the issue to the manager or security representative.

## 4. Employee data

DIDWW respects the privacy of its employees (current and former) and treats it with confidentiality and integrity. Below you may find a few exceptions when an employee's consent may be required to disclose personal data:

- For a particular legal regulation or obligation;
- For performing tasks decided upon by a public authority.

# Comply with the law

Being a global company, we operate across different geographic boundaries and are obliged to understand all the relevant legal information. As a worldwide player conducting its business and offering products around the world, DIDWW takes responsibility and a strong commitment to follow and comply with all the applicable international and local laws and regulations, including anti-bribery, anti-tax evasion, and anti-slavery laws such as the Criminal Finances Act 2017 (CFA) and the Criminal Justice 2010 (Money Laundering and Terrorist Financing Act) (together, Compliance Laws).

We believe it is crucial for all our employees and business partners to demonstrate the highest standards of personal integrity to avoid unethical business practices, including money laundering, bribery, disclosure of confidential information, etc. Hence, we uphold a “zero tolerance” policy daily, aiming to ensure personal and organizational integrity.

## 1. Contractual obligations

DIDWW aims to provide the highest standard of services. We assure a certain service level and quality by setting specific terms with our suppliers in the contractual obligations. When entering into a partnership, we evaluate our contribution and outline the level of service we expect, along with any limitations or restrictions. We select partners based on their proven reputation for integrity and other merits. All agreements are clear, unambiguous, and well-documented, including any subsequent additions, and cover aspects such as the use of confidential information, protection of intellectual property rights, and financial integrity.



## 2. Anti-money laundering policy

Money laundering involves participating in financial transactions in order to disguise the identity, source, or destination of money and is often linked to illegal activities such as bribery, terrorism, and drug trafficking. In accordance with our Anti-Money Laundering Policy, we are committed to preventing money laundering in our operations or business transactions and comply with all relevant laws and regulations.

## 3. Anti-bribery and corruption frame

DIDWW believes that only an ethical, legal, and transparent business can succeed in its vision, achieve its goals, and implement its values. Therefore, we do not tolerate any illegal behavior, acts of corruption or bribery. Our adherence to all applicable laws includes actions to prevent corruption, as outlined in our Anti-Bribery and Corruption Policy. We should never offer, pay, promise to pay, or accept anything of value, either directly or indirectly, to improperly influence others, including our customers, partners, or governmental authorities.

Our interactions with global organizations, governments, and officials are guided by high ethical standards and transparency. As such, bribery or any form of corruption is illegal and strictly prohibited.



# Conclusions

Addressing issues or speaking out when something is not right might be challenging, uncomfortable, or require courage. However, fostering an environment that enables employees and other members to voice concerns responsibly and effectively is vital for transparency within our company. Occasionally, employees may uncover practices that seem wrong or malicious within the organization. When this occurs, they should promptly report the issue internally, without fear of retaliation.

The EU Whistleblowing Directive 2019 provides legal protection for employees, preventing them from being dismissed or penalized for revealing serious concerns. Our Whistleblowing Policy integrates the provisions of the Whistleblowing Directive 2019 into everyday procedures, serving as the tool we employ to detect and prevent misconduct such as corruption, bribery, money laundering, sexual harassment, or any other malpractice within DIDWW.

We encourage all employees to use the reporting option they feel most comfortable with. Concerns may be brought to a direct manager, another DIDWW manager, HR, or the Legal Department, and in all cases, the employee's confidentiality will be respected and protected.

Many of the subjects discussed in this Code are elaborated in other DIDWW company policies. We invite employees to review these policies for further guidance and details.

Remove the boundaries

**DIDWW**