

1. Introduction

Delight Company specializes in equipping, design, and architecture of business space, as well as execution of finishing works. With offices across Central and South-eastern Europe, Delight provides and maintaining equable and leading level of service and support throughout the region.

The company was founded over a decade ago, and since then has been constantly developing and growing its portfolio of products and services, which brought the company to present day positioning and capacity to offer creative, practical, and profitable solutions to its clients, being it individual product purchases or extensive encompassing projects. The complete solution for business space has become synonymous with the Delight Group of companies.

As a result of continuous development of organizational structure, management, business processes' software, as well as all other aspects of coordination and organization of business activities, the Delight Company has been certified with the ISO 9001:2008; ISO 14001; ISO/IOC 2701 quality management system standards.

2. The Scope of the Code

Delight approaches overall business undertakings towards employees, clients, partners and competition with upmost honesty, respect, and integrity at its core of business culture. Delight is an organization that is thoroughly reliant upon business ethics, and as such undertakes all responsibility to secure that the operations do not induce in any way, directly or indirectly, a breach of human rights. Delight pursues all activities to secure that its employees, through constant training, become aware of the company's duties and commitments regarding human rights, as well as their own rights and obligations.

The purpose of this Code is:

- to contribute to the operational activities of the company in the spirit of business morals, positive and good entrepreneurship, practices and values of fairness and consciousness, and enabling transparency of business entities' activities.
- To perform business activities in accordance with the requirements of business ethics and standards of business morals as integral part of the Delight business policies.
- In endeavouring to implement the policies we will strive to build business relationships with partners who respect the same values and who are guided by the same ethical principles in business. We will commit to regard our suppliers in the same way we would expect them to behave towards us and to that end we have set ourselves an array of strict ethical values which guide us in our business.





3. Accountability of the Code of Ethics

Principles and practices of the Code in terms of accountability is the obligation of each member of Delight group, and in terms of reference includes all suppliers, subcontractors, consultants, traders, brokers, sellers, contractors, and agents. Delight expects that all encompassed within the reference scope will transmit the values and obligations determined by this Code to their employees and subcontractors who perform and executive activities on behalf or as part of Delight business undertakings, and thereafter ensure that the Code is accepted, respected, and adhered to. Delight anticipates that all encompassed by the Code will abide by the values and obligations specified in this Code in the same manner Delight itself adheres to.

4. Fundamental Values

Employees' Rights

Delight respects all rights of the employees as per the regulations and laws of the national legislations of the countries in which it operates, as well as the right prescribed by the conventions of the International Labour Organizations. This is expected from all legal entities and physical persons encompassed by this Code.

Prohibition of child labour: Delight will not employ children under the age of 15 (or 14 in the countries where national legislation allows it), nor children under the permitted employment age if that limit is above 15 years. This is expected by all encompassed by this Code.

Prohibition of forced labour: Delight employees are employed in its entirety on voluntary basis and any kind of extortion, forced or compulsory labour, slave or coercion is prohibited. This is expected by all encompassed by this Code.

Wages, benefits and working hours: Delight expects all encompassed with this Code to give monetary compensation to their employees that are competitive in this branch of the economy, that are fair, and that are in absolute compliance with the applicable regulations with regards to the salary level, compensation and working hour duration. Delight expects that all incorporated within the Code will provide all employees the opportunity to develop their skills and competences and promote fair and dedicated promotions. Delight furthermore is fully committed and expects all encompassed within the Code to adhere to all relevant national laws and regulations and processes with regards to working hours, reimbursement, and monetary compensation.

Prohibition of discrimination: As already enforced by Delight group of companies, Delight expects all encompassed by this Code to conduct towards, assess and evaluate their employees and colleagues based on their professional capabilities, never based on their physical and/or personal characteristics or beliefs, thus confirming there is absolutely no discrimination in terms of race, skin colour, religion, political opinion, nationality, sexual orientation, or any other characteristics.





Delight respects all human rights proclaimed by the national legislation as well as international legal decrees, United Nations Universal Declaration on Human Rights, Council of Europe Convention for the Protection of Human Rights and Fundamental Freedoms, and all other international decrees that have been ratified by the countries Delight operates in. Delight expects all encompassed by this Code to respect and comply with the above stated legal documents.

Health and Safety: Delight expects all encompassed by this Code to pursue the upmost standards of work safety. Suppliers are expected to meet all required applicable regulations regarding work safety, and secure a safe work environment, additional to the enforcement of procedures and policies for the minimalization of risks of injuries, accidents, and possibilities of exposure to poor health conditions.

Environment

Delight expects all encompassed by this Code to perform their business activities with intent and objective to protect and preserve the environment, reduce, or eliminate various waste, conserve water and energy sources and undertake policies and practices which promote material substitution, conservation, recycling, and finally production alteration and building administration, management, and maintenance in order to adhere to environment protection and preservation.

Health & Safety

Delight expects all encompassed by this Code to perform their professional activities in accordance with the Law on Safety and Health at Work and comply with all related bylaws and regulations, respect and consider recommendations by state institutions and structure and enforce all modern technical, ergonomic, health, wellbeing, educational, social, organizational, and other measures, and resources to eliminate all possible risks of injury.

Security & Protection

To create a secure and safe environment for business operations, all encompassed by this Code are expected to respect and enforce the Law on Private Security, or rather all working with Delight must respect:

- 1. System of security that would prevent unauthorized access to working space and offices used in work and daily operations.
- 2. Security measures that prevent unauthorized access to loading and unloading areas and space where goods and products are stored.
- 3. Procedures for handling and processing import and/or export licences relating to restrictions and exclusions.
- 4. Security measures for identification of business partners
- 5. Security system of screening of current and future employees for the purpose of increasing the expertise level within the sphere of security and safety
- 6. Procedures for ensuring adequate control of transport of goods, incoming goods, and cataloguing into logistics' system.
- 7. Appropriate security and safety measures that ensure the integrity of the overall processes.



5. Principles and regulations of the business ethics

The acknowledgement and respect of the principles and regulations of the business ethics implies, but is not limited to following principles:

- 1. Professional conduct of business and professional activities.
- 2. Conscientious and complete appropriation and implementation of obligations and responsibilities.
- 3. Execution of business undertakings that will not impede on professional reputation.
- 4. Use of permissible funds to achieve business goals.
- 5. Compliance with regulations relating to incompatible activities
- 6. Trade secret protection.
- 7. Avoidance of conflict between personal and professional entities.
- 8. Conduct of business activities that avoid harm to shareholders, company members or partners.
- 9. Execution of professional activities that increases the value of the capital.
- 10. Refraining from use of political influence or pressure for business gain.
- 11. Realization of business cooperation with other legal entities bona fide.
- 12. Resolution of disputes between partners through negotiation or mediation in effort to continue business relations.

6. Compliance with the Competition Law and Conflict of Interest

All encompassed by this Code will strictly abide by all current and applicable antitrust laws, trade laws, and all other laws, regulations and rules relating to anticompetitive monopolization and unfair competition, prohibiting unfair and deceptive acts or practices in commerce. No deals nor exchanges will be made with competition or other individuals which can unfairly affect competition, including, but not limited to price fixing or market distribution. All encompassed by this Code are expected to opt and cooperate with suppliers who strive to do business with Delight in an open and fair manner that is based on merits, quality and value of products and services, without any benefits for their family or them directly. Accordingly, employees shall not have any financial interest or any other relationship with a supplier that could deter or affect employee's obligation to act in the best interest of the Delight group of companies.

7. Prevention and Prohibition of Corruption

All encompassed by this Code must respect all applicable and current laws and regulations relating to the prohibition and prevention of bribery of government employees. With regards to any Delight transaction or any transaction that involves Delight, all encompassed within this Code must not offer or present anything of value, directly or indirectly, to anygovernment employee, employee working for a legal entity under direct or indirect control of government administration or political party in order to obtain any inappropriate benefit or advantage.



All encompassed by this Code must have a written trail of all payments (including all gifts, meals, entertainment, or anything of value) that have been presented on behalf of Delight or from the funds provided by Delight. All encompassed by this Code are obliged to submit a copy of evidence of these payments at request from Delight administration or management.

Delight employees are not allowed to accept anything from the supplier that cannot be construed as ordinary business hospitality and etiquette, and which is considered reasonable and appropriate in given context. Regular business meals, representation and business protocol and etiquette offerings are usually accepted, but the suppliers should not offer Delight employees inappropriate or expensive gifts, meals or entertainment that can be construed as inappropriate influence on decision-making. Cash gifts, and monetary equivalents such as gift cards are not allowed. Gifts and entertainment for suppliers must support legitimate Delight business interests and should be reasonable and appropriate in given circumstances. Our employees should always consider the rules of our suppliers regarding acceptance of gifts and entertainment.

8. Privacy Policy Precis

Delight respects the obligations of the protection of confidential information. All data characterized by third parties as confidential and brought into possession by Delight while performing their duties and business activities shall be regarded as their own throughout the duration of work or contractual cooperation throughout the confidentiality status of the data.

Delight adheres to all necessary measures to ensure that the information obtained is secure and expects this from all encompassed by this Code. Accordingly, only authorized employees of Delight companies that are service providers and business partners have access to the same and are in entirety obliged to securely store classified information. Please refer to our complete Delight Privacy Policy

9. Changes to the Code of Ethics

Delight reserves the right to make alterations or make updates to this Code of Ethics, which all encompassed by this Code are further obliged to abide by.

10. Correlation to the law and other codes

The Code does not affect the applications of any laws regulating the status, rights, and obligations of all referred to by this Code.

All encompassed by this Code are obliged to abide by all applicable laws, rules, and regulations of the country of operation, as well as maintain a system of monitoring of compliance with the laws, rules and regulations. In the event of the Code requirements being more lenient than the state legislation of the country of operation, the person or entity to which the Code refers to is always obliged to respect and uphold the national legislation.



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