DUMAREY	@Dumarey - Confidential
Code of Ethics (US)	**Revision 1.1** valid since 25/07/2025

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1.0 Purpose and Scope

At Dumarey USA LLC (“Dumarey”), we are committed to upholding the highest standards of ethics, integrity, and responsibility in everything we do. This Code of Ethics outlines the values, principles, and expectations that guide the behavior of all individuals working with or on behalf of Dumarey. It serves as a compass for making responsible and ethical decisions in the workplace.

Dumarey promotes a workplace culture rooted in our values of integrity, excellence, creativity, entrepreneurship, and partnership. These values are reflected in the way we treat one another—with respect, trust, and transparency—and in the decisions we make every day.

We are also committed to advancing environmental sustainability, social responsibility, and good governance (ESG principles) – the three criteria established in 2005 by the United Nations. All employees are expected to uphold and support these values in their roles.

We believe diversity, equity, and inclusion are not only moral imperatives but also key to innovation and long-term success. Ethical behavior supports our continued growth and safeguards our company's reputation.

2.0 Who Must Follow This Code

This Code applies to all Dumarey employees, including directors, officers, managers, salaried and hourly staff, interns, and temporary workers (collectively, “Employees”), as well as contractors, suppliers, consultants, customers, and any third parties who work with or represent Dumarey (collectively, “Third Parties”).

All individuals covered by this Code are referred to as “Covered Individuals” or “Recipients.” Employees who oversee or manage Third Parties are responsible for ensuring that these individuals are aware of and comply with this Code when performing work on behalf of Dumarey.

3.0 Standards of Conduct

We expect all Covered Individuals to act with honesty, fairness, and accountability. Key ethical principles include:

- Complying with all applicable laws, regulations, and company policies;
- Avoiding conflicts of interest;
- Treating all individuals with fairness and respect;
- Keeping accurate and transparent records;
- Promoting a safe and inclusive work environment;
- Respecting human rights and the environment.

3.1 Compliance with Laws and Company Policies

Each person is responsible for understanding and complying with the laws and regulations relevant to their role, as well as Dumarey’s internal policies and procedures. If you are unsure about how to interpret a law or policy, you should contact your supervisor or the Human Resources team.

3.2 Giving or Accepting Gifts, Entertainment, or Favors

Dumarey strictly prohibits bribery and any form of corruption. We comply with anti-corruption laws in all jurisdictions where we operate, including the U.S. Foreign Corrupt Practices Act (FCPA).

Covered Individuals may not give, offer, or accept gifts, entertainment, or other benefits that could be seen as influencing business decisions or creating an obligation. Modest tokens of appreciation or business meals are acceptable if they are infrequent, customary, and valued at no more than $50. Anything above this threshold requires prior written approval from your manager and/or Human Resources.

Employees must never accept gifts or favors in exchange for preferential treatment or as a reward for decisions made in their professional role. When in doubt, consult your supervisor or Human Resources.

3.3 Interactions with Government Officials

All interactions with government entities and public officials must be conducted with transparency and integrity. Only individuals specifically authorized may communicate or negotiate with government agencies on behalf of Dumarey.

It is strictly forbidden to offer, promise, or provide anything of value to a public official with the intent to obtain or retain business or secure any improper advantage. Violations of these rules can result in serious legal consequences for both the individual and the company.

3.4 Avoiding Conflicts of Interest

Employees must avoid situations in which their personal interests interfere—or appear to interfere—with the interests of Dumarey. Examples of potential conflicts include:

- Having a financial interest in a company that does business with Dumarey;
- Hiring or supervising a family member;
- Receiving personal benefits from a supplier or customer;
- Using company resources for personal gain.

If you suspect a conflict of interest, you must disclose it to your manager or Human Resources. Even the appearance of a conflict can harm trust and should be addressed proactively.

3.5 Anti-Money Laundering Compliance

We are committed to preventing the use of our operations for money laundering or other illicit activities. Employees and business partners must not accept payments from unfamiliar or unverified sources or conduct business with organizations lacking transparency in ownership or operations.

If you observe suspicious financial transactions or suspect money laundering, contact Human Resources immediately.

3.6 Financial Integrity and Recordkeeping

Dumarey maintains accurate and reliable financial records in accordance with U.S. IFRS and all applicable laws. All business records, including expense reports, financial statements, timesheets, and production logs, must be complete, truthful, and properly maintained.

Any false, misleading, or intentionally inaccurate entries are strictly prohibited. All financial transactions must be authorized by the appropriate personnel and supported by clear documentation. Employees must report suspected accounting irregularities to their supervisor or Human Resources.

3.7 Cooperation with Legal or Regulatory Authorities

If contacted by a government agency, law enforcement officer, or legal authority in connection with an investigation, employees must cooperate fully while ensuring compliance with Dumarey's legal procedures. Employees must notify Human Resources before responding or providing documents, unless explicitly prohibited by law.

4.0 Protecting Company Assets and Confidential Information

At Dumarey, we take seriously our responsibility to protect the assets, information, and reputation of the company. All employees are expected to handle physical and digital resources with care, safeguard sensitive data, and use company tools and systems appropriately. Please reference the “Confidentiality, Intellectual Property, and Non-Solicitation Agreement” for more information.

4.1 Confidentiality and Information Handling

Confidential and proprietary information—whether related to our products, customers, financials, employees, or intellectual property—must be handled with the highest degree of integrity and discretion.

Employees and third parties who access this information are responsible for ensuring it is:

- Used only for authorized business purposes;
- Shared only with individuals who are authorized and have a legitimate business need;
- Protected from unauthorized disclosure, both internally and externally.

This obligation continues even after employment or business relationships with Dumarey end. Similarly, individuals must not bring confidential information from a prior employer to Dumarey without written authorization.

4.2 Use of Company Assets

Employees are responsible for protecting company property and using it appropriately. This includes physical property (e.g., computers, phones, vehicles) and intangible assets (e.g., data, intellectual property, and brand reputation).

Company resources must not be used for personal gain or in a manner that could damage Dumarey's reputation. Loss, theft, or misuse of company property must be reported immediately.

4.3 Personal Data Privacy

Dumarey is committed to protecting the privacy and personal data of our employees, customers, and partners in accordance with applicable U.S. privacy laws such as the California Consumer Privacy Act (CCPA) and relevant federal legislation.

Personal data, including names, contact information, Social Security numbers, financial data, health information, and demographic identifiers—must be handled with care and processed only when necessary and permitted by law.

Only employees with specific authorization and training should access or process personal data. Improper use or unauthorized disclosure of personal data can result in disciplinary action and legal liability.

4.4 Intellectual Property Protection

Dumarey's intellectual property (IP) includes patents, trademarks, copyrights, trade secrets, product designs, engineering data, and technical know-how. IP is a critical business asset and must be protected from misuse, theft, or disclosure.
All employees are expected to:

- Use Dumarey's IP only for authorized business activities;
- Refrain from sharing or publishing proprietary content without approval;
- Report any suspected IP theft or misuse to Human Resources;
- Respect the IP rights of others and avoid the unauthorized use of third-party content.

4.5 Cybersecurity and Digital Systems

Information systems, including computers, email, software, and internet access, are provided to support Dumarey's business activities. Employees are expected to use these resources responsibly and to follow all company policies related to information security and data protection.

Employees must:

- Protect usernames, passwords, and access credentials;
- Refrain from installing unauthorized software;
- Avoid using company devices for illegal or inappropriate activities;
- Immediately report suspected cybersecurity breaches, phishing attempts, or system vulnerabilities to the Information Security ("IS") team.

4.6 Use of Physical Company Assets

All company property, including equipment, tools, vehicles, mobile devices, and facilities, must be used appropriately, responsibly, and in accordance with company policy. Personal use of company resources should be minimal and must not interfere with job responsibilities or violate policies.

Employees are expected to:

- Maintain and secure assigned assets;
- Use equipment only for authorized business purposes;
- Report loss, theft, or damage immediately to the appropriate supervisor or department.

4.7 Legal Inquiries and Dispute Management

All legal matters concerning Dumarey must be handled through the appropriate internal channels. Employees are not authorized to respond to legal claims, investigations, or communications from attorneys or government officials on behalf of the company.

If you receive any legal document—such as a subpoena, notice of investigation, or request for information—you must immediately forward it to your Supervisor. Only authorized representatives may retain external legal counsel or speak on behalf of the company in a legal context.

Prompt and centralized handling of legal matters ensures that Dumarey responds appropriately and in compliance with the law.

4.8 Social Media and Public Communication

What employees share publicly, including on social media, can reflect on Dumarey's brand and reputation. While personal expression is protected, employees must use good judgment and avoid posting content that could harm the company, disclose confidential information, or be viewed as harassment, discrimination, or misinformation.

Unless explicitly authorized, employees should not:

- Speak on behalf of Dumarey on social platforms;
- Share confidential or non-public company information;
- Represent Dumarey in media interviews, blogs, or public speaking events.

If you are approached by a member of the press or a third-party media outlet, immediately refer them to the Communications team or your designated business leader.

4.9 Representing Dumarey's Brand

Employees contribute to Dumarey's public image through their conduct, professionalism, and communication. Any use of Dumarey's logo, name, branding elements, or messaging must follow internal brand guidelines and be approved by the Communications and Marketing team.

Do not:

- Use the Dumarey name or branding for personal projects;
- Create or distribute public-facing content that suggests company endorsement without permission;

- Share proprietary company visuals or promotional materials without proper authorization.

Professionalism, discretion, and alignment with company values are expected whenever representing Dumarey in any capacity—both internally and externally.

5.0 Fair Competition and Responsible Business Practices

Dumarey is committed to operating with integrity in the marketplace. We compete fairly, comply with all applicable trade laws, and hold ourselves and our business partners to high ethical standards.

5.1 Compliance with Antitrust and Competition Laws

We fully comply with U.S. antitrust laws and related regulations that prohibit practices that unfairly restrict competition.

Employees must never engage in practices such as:

- Price fixing or bid rigging;
- Dividing markets, customers, or territories;
- Exchanging sensitive pricing or customer information with competitors;
- Coordinating product offerings or terms with competitors.

Participation in trade associations or industry meetings must be handled carefully. If any discussions veer into prohibited topics, employees must remove themselves and report the incident immediately to Human Resources.

Violations of antitrust law can result in severe penalties, including criminal charges, for both the company and individuals involved.

5.2 Compliance with Import and Export Controls

Dumarey complies with all applicable U.S. and international laws regulating the transfer of goods, technology, services, and data across borders.

Employees involved in cross-border activities must:

- Understand and follow relevant export licensing and documentation requirements;
- Avoid doing business with embargoed countries or sanctioned entities;
- Not ship restricted items without the necessary approvals.

Even the electronic sharing of technical data across borders (e.g., email or cloud storage) can be subject to export controls. When in doubt, consult Human Resources before acting.

5.3 Working with Suppliers and Third-Party Partners

We choose suppliers, consultants, and other partners based on merit, quality, cost, and integrity—not personal relationships or favors.

All third-party relationships must:

- Comply with applicable laws and ethical standards;
- Be properly documented with contracts or agreements;
- Be free of conflicts of interest, favoritism, or kickbacks.

Dumarey expects our suppliers and partners to share our values regarding ethical labor practices, anti-corruption, data security, and environmental responsibility. We reserve the right to audit or terminate relationships if these standards are not met.

6.0 Human Rights, Respect, and Inclusion

At Dumarey, we believe that respect for human dignity is foundational to a thriving workplace. We are committed to upholding internationally recognized human rights, ensuring fair and equitable treatment of all people, and fostering a culture of inclusion where every individual can contribute and thrive.

We expect all employees, contractors, suppliers, and partners to uphold these values in their daily work and interactions.

6.1 Inclusive Culture and Equal Treatment

Dumarey promotes respectful communication and equitable collaboration across all levels of the organization. We do not tolerate discrimination or harassment of any kind, whether based on:

- Race, ethnicity, or national origin
- Religion or creed
- Age
- Disability or medical condition
- Sex, gender identity, or gender expression
- Sexual orientation
- Marital or family status
- Veteran or military status
- Political affiliation or any other protected characteristic under federal, state, or local law

We are committed to creating an inclusive environment in which all individuals feel welcomed, respected, and empowered. Any employee who experiences or witnesses discrimination or harassment should report it immediately to Human Resources.

6.2 Respectful Communication and Professional Conduct

Everyone at Dumarey has a role in maintaining a respectful and productive work environment. This includes:

- Using professional, inclusive, and non-hostile language in all interactions;
- Avoiding inappropriate jokes, slurs, or behaviors that could create discomfort or offense;
- Demonstrating civility, even during disagreement or conflict.

We encourage open dialogue and constructive feedback, but never at the expense of another person’s dignity or psychological safety.

6.3 Anti-Harassment and Retaliation-Free Workplace

Dumarey is committed to a workplace free of harassment, including sexual harassment, bullying, intimidation, or retaliation. Harassment may include:

- Unwelcome sexual advances, requests for favors, or inappropriate comments
- Verbal abuse or insults
- Threats, coercion, or exclusionary behavior
- Retaliation against someone for reporting a concern or participating in an investigation

All complaints will be taken seriously and addressed promptly and fairly. Retaliation against any person who raises a concern in good faith is strictly prohibited.

6.4 Prohibition of Child Labor and Forced Labor

We do not engage in or tolerate any form of child labor, forced labor, or human trafficking. This applies not only to Dumarey's direct operations, but also to our global supply chain.

We expect our vendors, suppliers, and partners to adhere to labor practices that meet or exceed the standards of the International Labour Organization (ILO), the U.S. Department of Labor, and other relevant legal authorities.

Any violation of this policy may lead to termination of contracts or other legal consequences.

7.0 Workplace Health, Safety, and Environmental Responsibility

At Dumarey, we are committed to protecting the safety, health, and well-being of our employees and ensuring the highest standards in product quality and environmental responsibility. We comply with all applicable federal, state, and local safety laws, including those enforced by the Occupational Safety and Health Administration (OSHA), the Environmental Protection Agency (EPA), and other relevant agencies.

We believe that a safe, ethical, and environmentally conscious workplace is essential to the success of our business and the trust of our customers.

7.1 Health and Safety

Dumarey provides a safe and healthy work environment in compliance with all applicable federal, state, and local health and safety regulations, including OSHA standards. We take a proactive approach to identifying potential hazards, assessing risks, and implementing preventive measures. Our risk mitigation approach is based on best practices, implementing a hierarchy of controls (elimination, replacement, engineering interventions, administrative and procedural interventions, PPE), and sharing "lessons learned" derived from past incidents.

Safety is everyone's responsibility: employees are expected to follow all safety procedures, participate in training, and report any unsafe conditions or incidents immediately.

Occupational health assessments may be required for certain roles to ensure that employees are medically fit for their job duties.

Whether it's through training, the use of appropriate personal protective equipment (PPE), or safe work practices, we strive to prevent accidents and promote a culture of accountability and care.

7.2 Product Safety and Quality

Product safety and quality are core to our reputation and customer trust. Every employee shares in the responsibility for ensuring that the products we deliver meet or exceed all required safety and quality standards. If you identify a potential issue, whether a defect, deviation from specifications, or quality concern, it is your duty to report it promptly to your supervisor or the product management team. Transparency allows us to investigate, take corrective action, and prevent issues from recurring.

7.3 Environmental Protection and Sustainability

Dumarey is dedicated to environmental stewardship. We comply with all applicable environmental laws and company-specific policies to minimize our environmental impact. Across our operations, we are working to reduce waste, conserve energy and water, and lower greenhouse gas emissions.

We encourage employees to adopt sustainable practices in their daily work and support initiatives that promote cleaner technologies and more efficient use of resources. Our goal is to continuously reduce our carbon footprint and contribute meaningfully to climate protection efforts.

Dumarey intends to make a significant contribution to the reduction of environmental impacts along the entire value chain and actively promote climate protection. The principles of environmental protection that Dumarey follows are:

- To be engaged in actions that protect the environment and use renewable energies.
- To be committed to reducing waste and atmospheric pollutants.
- To be committed to sustainable resource management, such as not wasting water and energy resources, as well as recycling materials throughout the production cycle and product life cycle.
- To keep involving employees actively in the protection and conservation of the environment.
- To develop and implement technologies aimed at minimizing polluting emissions as well as minimizing our carbon footprint.
- To carry out periodic checks aimed at assessing the environmental impact of the site, both in terms of noise and polluting emissions, with a view to continuous improvement.

7.4 Transportation of Hazardous Materials

When transporting or handling materials classified as hazardous—such as chemicals, vehicle components, advanced technologies, or certain equipment—we follow all applicable U.S. Department of Transportation (DOT) regulations for hazardous materials. This includes land, sea, air, or rail transport, as relevant to our operations.

Employees involved in these processes must comply with all internal procedures and receive appropriate training. Questions about compliance or handling procedures should be directed to the Environmental Health and Safety (EHS) team.

8.0 Reporting Concerns and Misconduct

We expect all employees to uphold high ethical standards and speak up when something doesn't seem right. If you suspect or become aware of any activity that may violate the law, company policy, or this Code—including fraud, harassment, discrimination, theft, safety violations, conflicts of interest, or misuse of company resources—you have a responsibility to report it.

Whistleblowers acting in good faith are protected from retaliation under company policy and applicable law. If you experience or witness retaliation, contact Human Resources immediately.

Reports should be made honestly and in good faith. Submitting false or malicious claims may itself be subject to disciplinary action.

9.0 Violations and Disciplinary Action

Violations of this Code may result in disciplinary measures, up to and including termination of employment, in accordance with applicable U.S. laws and company policies.

Disciplinary actions are based on the nature and severity of the violation and are handled consistently and fairly.

If a contractor, vendor, or other third party fails to comply with our ethical standards, we may suspend or terminate our relationship with them, depending on the circumstances.

Change History:

Version	Important Changes	Changed Date
1.0	Policy Created	4/30/25
1.1	Added Index, signatures on page one, reference HR in place of legal and compliance	25/07/2025