

Dibber 

Code of Conduct



CODE of CONDUCT and BUSINESS ETHICS («Code of Conduct»)

The Code of Conduct is a shared statement of our commitment to upholding the ethical, professional, and personal standards related to (a) human rights, (b) child welfare, (c) work environment, (d) speaking up, (e) compliance and data integrity, and (f) safeguarding our assets. This document is reviewed and reissued annually. The Code of Conduct is based on Dibber purpose, Heart Culture, values and commitments, which together define the foundation on which we stand as a company and individuals.

We develop lifelong learners with the heart for the world. To live up to this **purpose**, we are a reliable, safe, and stable education company. Our pedagogy is research-centred and well-proven. We employ *best leaders* in child and youth education. Our employees are both *warm-hearted* and *professional*. Our operations are embossed with high *quality* and *safety* in everything we do. Our values are strong, but it is how we live up to our values through our behaviour that matters the most.

The Code of Conduct helps us to live and work in accordance with our **commitments**. To do this, as a company:

- We lead the change in early childhood education globally by delivering world class ECD and school services.
- We are famous for very high quality in our ECD centres and for our Dibber Childhood pedagogy.
- We make every child who we are in contact with experience and believe they are valuable.
- We grow in a profitable and sustainable way.

Code of Conduct is part of The Dibber Way, our framework for who we are, how we design and deliver our services, live our purpose and values, and continuously learn and improve.

Dibber's responsibility applies in relation to all employees, children, parents & caretakers, authorities, buyers, suppliers, investors, and other partners.

The Code of Conduct is outlined below and while it is impossible to describe every potential situation, where we make decisions or choose a course of action, it provides an ethical compass in how we overcome our challenges and achieve our success. Complying with our Code of Conduct is about creating an open and inclusive environment, where we live up to our values, give positive examples and support each other in the dilemmas that we face daily.

A. Human Rights

We at Dibber foster long-term, sustainable relationships with each of our employees and believe in mutual respect between all employees in our organisation.



We have operations in various countries in Europe, Asia, Middle East, and Africa, with further expansion plans to cover other parts of the world. We comply with the laws and regulations of each country. This means that we adhere to the relevant statutes and other regulations, such as those relating to working conditions, work environment and freedom of association, and we regard local laws and regulations as minimum requirement. We apply collective agreements in our operations, where applicable. All our employees are treated with respect and dignity. Nobody is discriminated against or harassed on any ground, including:

- gender
- transgender identity or expression
- ethnicity
- religion, or other belief system
- disability
- sexual orientation
- age

Equal treatment is thus a natural approach, and we endeavour to achieve a diverse workforce. Our Heart Culture creates a warm and inclusive atmosphere, where harassment, bullying, threats, repression, or other discriminatory treatment are not tolerated. No employee shall either be discriminated against on the grounds of their political affiliation. There are however expressions of political and religious nature which are not in accordance with the core values of Dibber. We as Dibber representatives at and outside work and express our opinions in ways that don't contradict our values or Code of Conduct.

We create an environment in which employees participate and have opportunities to exert an influence on the business and organisation. We engage employees in issues related to their work and we ensure that differing views are respected.

Dibber has no political affiliation and never lends its name to political parties. We might express our opinions on matters on the countries' political agendas, which refer to education, childcare, public and private financing, but we don't participate in or donate to political campaigns or associate with any political party or movement.

B. Child Welfare

Just like adults, children have human rights across the full spectrum of civil, cultural, economic, political, and social rights. Children have special rights because of their vulnerability, such as the right to protection from exploitation and abuse, the right to be cared for and have a home, and the right to have a say in decisions which affect them.

The main international human rights treaty on children's rights is the [UN Convention on the Rights of the Child](#) (CRC). In our pedagogy and operations, we follow the relevant guiding principles of CRC.

The UN Convention on the Rights of the Child underlines the kindergarten's duty to provide all children with a safe and good psychosocial kindergarten environment. At Dibber we have a zero-

tolerance policy against exclusion and bullying, and consideration for the child's best interests are our first priority. We focus particularly on preventive work, with play and inclusion, which is part of our Heart Culture. At Dibber, all children perceive themselves as significant participants in the kindergarten's community in play and everyday activities. The Convention requires kindergartens to work systematically and purposefully to prevent violations and bullying. The kindergarten promote equality and counteract all forms of discrimination.

For full text of UN Convention on the Rights of the Child, click [here](#).

C. Safe and Healthy Work Environment

Our work environment is safe and healthy from a physical, mental, psychological, and social perspectives. It complies with the relevant legislation and our agreements. We work systematically and preventively to continually improve our work environment and employee health.

We attract, develop, and retain competent leaders who create a work environment that provides high employee engagement and wellbeing for our employees. We offer opportunities for professional development, and our work conditions are consistent with the market and abide by collective agreements, where applicable.

D. Speaking Up

Dibber encourages all employees to speak up when we encounter behaviour in the workplace that is unethical, illegal or goes against our values or Code of Conduct. All employees can report irregularities via a whistleblower function. This means that an employee reports something anonymously and that an independent individual investigates the case. If an employee reports an irregularity, they are automatically awarded protection from reprisals in accordance with EU Directive 2019/1937 of 23rd October 2019 on the protection of persons who report breaches of Union law, or according to other applicable laws in the country of operations. In case there is no local laws and regulations on whistleblowing, we apply the EU principles as a minimum requirement.

To access Whistleblower function, click [here](#).

E. Compliance

a) Anti-Corruption

Our operations are characterised by high ethical standards, sound business practice, awareness of our responsibilities and impartiality. We abide by the contracts and agreements we have signed. They are respected according to their essence and not solely their literal meaning.

We treat our competitors correctly, while at the same time utilising our competitive advantages. Practices such as price fixing, forming cartels or abusing market position are not permitted.



We never use bribery or unlawful compensation in any form. We all at all times avoid risks of corruption and other inappropriate influence in our relationships with customers, suppliers and other external contacts. Hospitality and gifts are open, moderate and have a clear link to the business relationship. It is not permitted to request or promise something in connection with gifts. Employees are obligated to report any suspicions or evidence of bribery or unlawful compensation.

b) Conflicts of interest

It is important for all of us at Dibber to handle personal and financial interests in a way that is in Dibber's best interest for our business operations. Every employee is obliged to:

- inform their manager if they have another business or side-line;
- handle personal and financial interests in a way that is not contrary to, or may not be perceived to be contrary to Dibber's business operations; and
- report to their manager any relationship with an external party that constitutes a conflict of interest, for example, if an employee is friend or family with a potential supplier; then the process must be adjusted to take the potential conflict of interest into account.

We do not use relationships with business partners for personal gain. Business partners may, for example, include customers, suppliers, and other stakeholders.

c) Data integrity, information, and transparency

Dibber complies with current legislation regarding data integrity. This includes all sensitive and confidential information about children, parents & caretakers, and employees. It also includes all other business-related and price-sensitive information.

We treat registration, filing and use of data about children, parents & caretakers, clients, and employees as confidential and in accordance with respective current legislation.

Information about Dibber is open and accessible, within the rules that apply for privately-owned companies. Marketing and contact with customers and clients are honest and we promise only what we can deliver on.

F. Safeguarding our Assets

We use our funds and assets with care and efficiency and communicate within the bounds of commercial confidentiality. We manage and protect our assets and information to safeguard our business and reputation as well as safety and security of children in our care and our employees. Dibber's assets cover a range of both tangible assets such as real estate, vehicles, furnishings, educational tools, computers, software, telephones, as well as intangible ones such as concepts, pedagogy, strategy documents and similar items, all of which are key to the success of our company.



a) Intellectual Property

Intellectual property is one of the most valuable assets, which differentiates us from our competitors. We all are vigilant in safeguarding our patents, trademarks, copyrights, and all other proprietary information. Any unauthorised use of these could harm our business.

b) Confidential Information

All of us working for Dibber protect confidential information from improper disclosure and communication of confidential information is limited to individuals who need it in order to carry out their work.

Confidential information obtained from others is treated in the same way as we expect to treat information received from us and in accordance with the terms applicable to its disclosure. Any unsolicited third-party proprietary information should be refused.

c) Business Communication Tools and Social Media

We use our business communication tools primarily for business purposes and in line with applicable policies and guidelines. We do not use internal open social media channels to share confidential, personal or commercial information about Dibber, our customers or third parties.

When we speak about ourselves in external social media, we protect Dibber information that is not intended for the public. We are careful that our behaviour as individuals on social media is in line with Dibber's values since we all represent Dibber both at and outside work.

WE FOLLOW UP OUR WORK

We follow up our efforts to ensure that we are genuinely working according to our values and Code of Conduct by:

- Including the Code of Conduct in employment agreements.
- Monitoring the number of employees who complete the obligatory course at Dibber Academy, or as part of their on-boarding.
- Carrying out random checks in operations via customary internal control.
- Improving all reported and rectified serious irregularities via the whistleblower function.

Code of Conduct is our ethical compass in actions and decision-making. Everyday thousands of our employees take decisions that influence other people's lives, including children and teenagers. Although we all are expected to know and understand the Code of Conduct, it does not answer every question or anticipate every difficult situation we might encounter. It sets out a model to help us make the right decisions – decisions that could have a long-lasting impact. We let our employees know that they are never expected to make tough decisions alone; there are ample resources and channels that are available to ask questions and receive guidance. When training our employees in values and Code of Conduct we actively work with dilemmas.



WE SHARE RESPONSIBILITY

At Dibber we share responsibility. All of us – employees, leaders, and the owners are responsible for ensuring that our Code of Conduct is complied with.

- On appointment, every new employee affirms that they have read and will follow the Code of Conduct.
- Dibber Country Managers are responsible for implementing the Code of Conduct in their respective countries. They are responsible for ensuring that all employees complete a compulsory introduction programme at Dibber Academy. Through the courses and on-boarding programme they are informed about the Code of Conduct as well as about Dibber values.

Dibber's CEO is the owner of this document and is responsible for the Code of Conduct, which is reviewed by Dibber Global Leadership Team at least once a year. We ensure that any changes to Code of Conduct are properly communicated to all employees and that the employees affirm to them.

Questions and consequences

Employees who are unclear about how to interpret Dibber's Code of Conduct, values and/or The Dibber Way are invited to contact their respective manager or HR for help and guidance.

Employees can report breaches of this policy serious irregularities via Dibber's whistleblower function.

We do not accept any behaviour that is in breach of our Code of Conduct. Such behaviour may result in disciplinary action, which may also involve legal consequences and a police report.

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Dibber puts faith in all of us – its employees and managers – to employ sensible judgement, to seek advice when appropriate and to adhere to the highest ethical standards in the conduct of our professional and personal affairs.

