

# Code of Conduct

We build, we deliver, we lead

We are **Delivery Hero**



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ALWAYS  
DELIVERING  
AN AMAZING  
EXPERIENCE



# Our values and leadership

Delivery Hero is a truly global company, made up of employees with diverse cultures and backgrounds. Our Code of Conduct plays a vital role in enabling us to work together with integrity and respect.





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## Message from management

# Our commitment to responsible business

## Fellow Heroes,

Together, we set out to always deliver an amazing experience – fast, easy, and to our customer’s door. In order to continue to achieve our vision, we must manage our business responsibly and continue to earn and keep the trust of our customers and partners. **This relies on all our Heroes doing the right thing and making the right decisions in big and small ways, every day.**

To guide us, we act within the framework of ethics, integrity, and applicable laws, and always in the interest of Delivery Hero. Our values of aiming higher and delivering solutions allow us to drive the industry forward and bring new innovations to life. Our third value, we are Heroes because we care, influences our engagement with our communities and each other. Together our foundational values underpin all our actions and keep us on the right path towards achieving our ambitions.

**By following our Code of Conduct, we can ensure that we live our values in our day to day work.** Thank you for all that you do to help make Delivery Hero the world’s trusted leading local delivery platform and such an incredible place to work.

Your Management team

# Making the right decisions

**Take the time to read our Code thoroughly** and get to know both our global and local policies, which outline how we strive to meet our commitments.

It's important to **understand how our Code relates to your role** and recognize the key commitments and ethical standards relevant to your daily tasks.

**Make it a habit to follow our Code every day**, discuss its application with your colleagues, seek clarification if you have any questions, and help us cultivate a culture of sustainable action.



Delivery Hero is a truly global company, made up of employees with diverse cultures and backgrounds. Our Code of Conduct plays a vital role in enabling us to **work together** with integrity and respect.

Our Code of Conduct **helps us make the right decisions** in line with our values, supporting our reputation in the markets and the communities we operate in.

The Code of Conduct **applies to all employees** meaning all full and part-time employees, contractors, managers, and the members of our C-Level and executive board.

Everyone at Delivery Hero is required to know and follow the guidelines outlined in this document, and to remind others of them when appropriate. They apply to all companies of the Delivery Hero group.

All employees are provided with the Code of Conduct in its current version and are required to submit a binding acknowledgement.

# Lead with integrity

A leadership role is an acknowledgment of experience and knowledge, but it also entails significant responsibility. Whether a first-time people manager or C-level, our leaders play an important part in upholding our values and Code of Conduct.

**Model ethical behavior** by demonstrating how you apply our standards in your decision-making and by sharing how you handle situations that challenge these standards.

**Raise awareness** by discussing and promoting our company policies and mandatory trainings.

**Be attentive and supportive.** Report any misconduct and work with the investigation team to address issues (see Section 2, [We speak up](#)).

## Our leaders establish the tone and embody our culture.

Beyond our core values, leaders throughout our organization must live up to, and actively demonstrate, our leadership expectations.

Leaders should share a common commitment to drive the company's future by delivering meaningful business impact, leading inclusively, and building human connections in a digital world with **trust, empowerment, accountability, and care**.

Any manager, department head, or C-Level shall act by way of example and embody our values in all their actions and interactions.

They are expected to promote employee morale, foster a safe space for the exchange of ideas, and ensure that **compliance with applicable laws and the Code of Conduct is never disregarded in the pursuit of successful business results**.



# We speak up

At Delivery Hero, we recognize the importance of speaking up. We are committed to creating a culture where speaking up is not only encouraged but valued as an essential part of our commitment to excellence and ethical conduct.



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# When something is wrong, we speak up!

It is essential to feel safe when asking questions or raising concerns in order to create and maintain a work environment rooted in transparency, trust and accountability.



## Speak Up Channels

- If we feel uncomfortable or have a question, we should not hesitate to speak up and raise the issue with our **manager** or **People Partner**;
- For all compliance or ethical matters, we turn to our **Compliance Team**;
- For anonymous reporting of severe compliance breaches, Delivery Hero has set up an anonymous third party [Speak Up Portal](#) which is managed by the central Compliance Team.





## Speaking up confidentially

Delivery Hero will aim at protecting the confidentiality of the reported issue and where possible also the involved persons in compliance with applicable laws such as the EU Whistleblower Directive (2019/1937). For severe compliance breaches, the [Speak Up Portal](#), managed by the central Compliance Team, allows for fully **anonymous reporting**.

## Speaking up without fear of retaliation

Delivery Hero cares about protecting the persons that raise concerns and **does not tolerate** any form of retaliatory action against Heroes who report issues in good faith or participate in an investigation. If a Hero feels they have been retaliated against, they should reach out to their manager or to the Compliance Team immediately.

## Handling reports as a manager or team lead

When a manager receives a report from within their team, they are expected to **respond supportively and ensure confidentiality as well as non-retaliation for the reporter no matter when or why they are raising the concern**. Additionally, the manager should promptly involve the Compliance team to facilitate a thorough and impartial investigation into the allegations. This collaborative approach helps maintain transparency, accountability, and integrity throughout the process.

## Learn more about speaking up at DH

Our Compliance Portal has a dedicated section on the importance of speaking up.

It details the available internal and external channels, including Employee Guidance on the procedure and further explanation on the protection of whistleblowers.





# Our corporate responsibility

Delivery Hero respects the dignity and individual rights of all people, and believes that we can play a positive role in the communities in which we operate.

# We value our diversity

Delivery Hero is a truly global company, made up of employees with diverse cultures and backgrounds. We value our diversity and **promote a healthy, supportive and inclusive work environment**.

**We want a workplace founded on respect, integrity, and accountability** where all employees have the opportunity to reach their best performance - being creative, courageous, and confident.

Use work communication channels in order to **create a sense of community and belonging**, not division. Treat everyone you interact with respectfully. Be aware if certain behavior is unwelcome and make sure to immediately react appropriately by correcting your behavior.



## Non-discrimination and equal opportunities

Delivery Hero stands behind a policy of equal opportunities for all applicants and Heroes regardless of race, ethnic origin, age, color, sex, nationality, sexual orientation, gender identity and/or its expressions, creed, social class, religion, physical characteristics, health conditions, pregnancy or situations related to maternity/paternity, marital status, disability, ancestry, political opinions or any other characteristics or situations covered by national law.

## Zero tolerance

**Delivery Hero has zero tolerance for discrimination and harassment.** If any Hero feels like they may have witnessed discrimination or harassment, they should speak up for themselves and others (see section 2, [We speak up!](#)).

## Safe work environment

**Delivery Hero is dedicated to providing a safe, supportive, and inclusive work environment where we all feel valued.** We respect all applicable laws, rules, practices, and precautions to protect ourselves, our Heroes, and our customers. **This includes working free from the influence of any drugs or alcohol that could prevent work activities from being conducted safely.**

We all have a responsibility to immediately communicate accidents and unsafe or illegal practices or conditions to our direct managers.

## Anti-Discrimination & Anti-Harassment Policy

In case of further questions Heroes can find the **Anti-Discrimination and Anti-Harassment Policy** on our Compliance Portal.

# Supporting human rights

Delivery Hero recognizes its responsibility in a global and dynamic marketplace. We are committed to consciously monitoring our activities and those along our supply chains.

**We create transparency** both in our own business operations and in our supply chain.

**We are fair and responsible** applying the principles of our [Human Rights Policy](#) to our business decisions, in particular, when considering new partnerships or acquisitions.

When we suspect any human rights abuse in our operations or supply chain **we immediately report our concerns to our Compliance team.**

Delivery Hero respects human rights and affirms that **every human being without exception** is entitled to the rights and freedoms proclaimed in the United Nations Universal Declaration of Human Rights as per our [Human Rights Policy Statement](#).

Delivery Hero has a zero tolerance approach to all forms of human rights abuses, including modern slavery and child labor, within our business, operations, and across the whole supply chain.

We commit to conducting our businesses in a fair and responsible manner, by **upholding all internationally recognized human rights within our company and also in our supply chain.** We focus on living wage, working hours, discrimination, respect for freedom of association, and occupational health and safety as particularly sensitive areas in the context of Delivery Hero Group's activities.





# Our business relationships

We are committed to preventing financial crimes such as fraud and corruption with rules on conflicts of interest, giving and receiving gifts and invitations.

# Avoiding conflicts of interest

By openly acknowledging and disclosing your conflicts of interest, Delivery Hero can maintain transparency and ensure that decisions are made with fairness and integrity.

**Avoid personal investments in suppliers, vendors, or competitors.** Don't favor business partners for personal reasons.

**Disclose close personal relationships** (romantic or family) with colleagues or business partners to protect business decisions and transparency.

**When in doubt proactively disclose** and discuss your situation with your manager and the Compliance Team and ask yourself if this activity harms your ability to act in the interest of Delivery Hero.



If a Hero encounters a situation in which competing loyalties could cause them to pursue a personal benefit for themselves, their friends, or family at the expense of Delivery Hero, they are likely in a situation of conflict of interest.

## Conflict of interest policy

Want to know more about what a conflict of interest situation could look like? Read our **Conflict of Interest Policy**.

## There are different types of Conflicts of interest:

The **preferential treatment of business partners** out of private interest is not tolerated.

**Outside business activities** must not compete with or reflect adversely on the company or give rise to a conflict of interest.

**Romantic and close relationships** are private but when they affect the work environment or occur within a direct reporting line, they need to be disclosed.

# Standing for a world free of corruption

Any gifts or invitations exceeding internal thresholds must be disclosed and approved in advance by your manager and the Compliance team.

It is important to exercise great care and **act with the highest level of integrity** when interacting with **public officials**.

Keep in mind that benefits of any kind **intended to influence decisions are strictly off limits**.

## We do not tolerate any form of bribery or corruption

To keep our Heroes and the company away from a criminal offense under applicable laws, offering or accepting a bribe in any form, directly or indirectly, is strictly prohibited.

## Dealing with public officials

Never directly or indirectly offer any unlawful benefits, such as money, goods, or other forms of reward, to a public official with the aim to influence their decisions. **Always consult with the Compliance Team when interacting with public officials** and other public authorities in order to show due diligence in the execution of the company's activities.

## Gifts, Hospitality & Entertainment Policy

As a general rule, Delivery Hero prohibits offering, requesting or accepting gifts, hospitality, or entertainment that could be perceived as intended to improperly influence business decisions or gain an unfair advantage.

Heroes are expected to use their best judgment to assess whether they may give or accept a gift in accordance with our **Gifts, Hospitality and Entertainment Policy** and collect the necessary approvals.



## Donations and Sponsorships

**Our commitment to society is embodied by philanthropic sponsorship and social activities**, including donations to charities and non-profit organizations, as well as other benefits to the community. Donations and sponsorships shall always be provided pursuant to the terms of the applicable laws, and they shall never be associated, either directly or indirectly, with any unlawful act, or undue advantage for Delivery Hero.

No contributions, gifts, or payments may be made on behalf of the company to any government authorities, political party, candidate, or lobbying, religious or military organization without involving the Compliance team and following the approval process of the **Donations and Sponsorships Policy**.

# Preventing financial crimes

**Delivery Hero is committed to preventing all forms of financial crimes, especially money laundering, terrorist financing, sanctions/trade embargo violations and fraud.**

We fulfill our legal obligations to prevent such activities through the implementation of appropriate oversight systems and controls aimed at their detection, disruption and deterrence.

## Economic Sanctions

**Economic sanctions are the withdrawal of normal trade and financial relations for foreign and security policy purposes.**

Sanctions may be comprehensive, such as prohibiting commercial activity with regard to an entire country, or they may be targeted, such as blocking transactions by and with particular businesses, groups, or individuals.

Non-compliance with economic sanctions can have a significant impact on Delivery Hero, from penalties to criminal prosecution or even the designation of the company as a sanctioned party.

**All employees within the Delivery Hero Group shall be mindful of economic sanctions,** especially if they are based in countries targeted by economic sanctions.



## Fraud

Fraud is an illegal act characterized by deceit, concealment, or violation of trust to secure an unlawful gain. **We must all aim to be familiar with the different types of fraudulent behavior that might occur within our area of responsibility** and speak up when we become aware of red flags.

For details about the different types of fraud that can occur and how these should be reported, please reach out to our Compliance Team or read the **Anti-Fraud Policy**.



# Our commitment to the market

We are committed to building and maintaining the trust of our investors and other stakeholders and firmly believe in transparency and integrity when reporting our finances and selecting our suppliers.



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# We choose our partners with care

We always aim to ensure that our service providers and suppliers **follow the same high ethical standards** as we do.

Therefore, **we use due diligence** when selecting them and ask them to agree to our Third Party Code of Conduct before entering into a commercial agreement.

We **reach out to our Procurement team** when in doubt and our procurement guidelines are documented in our **Procurement Policy**.



## We keep accurate records

Delivery Hero can only establish and maintain the public's confidence, as well as the trust of our various stakeholders, by preparing our accounting and reporting based on generally accepted accounting principles.

**We therefore diligently comply with all statutory rules for accounting and financial disclosures, and don't tolerate any interference with our financial reporting or any manipulations of our accounts.**

## Commitment to timely payments for suppliers

**To support our suppliers and foster good relationships with them, Delivery Hero always intends to pay their invoices on time** according to the agreed payment terms.

This applies to all our suppliers, but it is particularly relevant for us when paying small and medium-sized entities (SMEs).

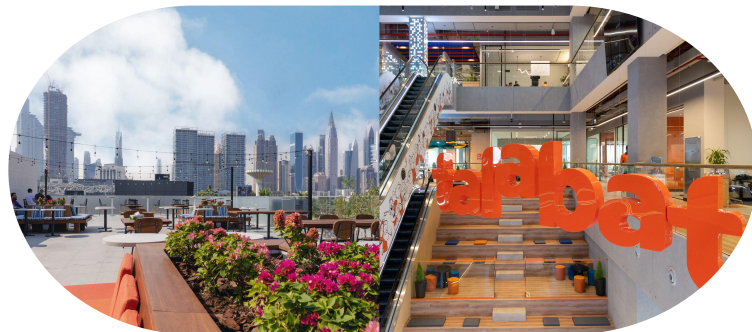


# We uphold fair competition

Delivery Hero competes vigorously in the sectors in which it operates but in a manner that is **fair, honest, ethical and legal**.

Delivery Hero **strictly forbids** any form of agreement or practice, be it written or oral, between competitors that may restrict or reduce competition.

*Some examples of these are price-fixing, bid-rigging, market-sharing through allocations of customers or territories, agreements not to deal with third parties, non-competes, sharing of commercially sensitive information, and agreements not to hire each other's employees.*



**We conduct our activities in accordance with competition and antitrust laws that apply within the EU as well as in all other countries where Delivery Hero does business.** These laws apply to any relationships with competitors, customers, vendors, service providers, and suppliers.

**Delivery Hero is committed to entering into fair and compliant agreements with vendors.** We carry out legal assessments to determine whether exclusivity, preferred partnerships, price parity, tying or bundling, or any other practices which may be considered restrictive of competition are compliant with local competition or antitrust rules.

#### **When in doubt**

Employees should remember not to discuss commercially sensitive information with competitors and when unsure they should always align with the Antitrust team.

To avoid practices that may result in allegations of a violation of competition or antitrust laws, **we apply the following rules:**

We do not enter into any practice, agreement, understanding, plan or scheme that is in breach of applicable competition or antitrust laws, notably with competitors or vendors.

We do not exchange or discuss with any competitor commercially sensitive information, (i.e. any non-public information which, if known, reduces the strategic uncertainty between competitors, for example, but not limited to pricing policies, marketing, and promotions, commercial strategy, strategic plans, customer or vendor lists, key terms in vendor contracts, remuneration of riders, and information about proprietary technologies and know-how).





# We trade solely on public information

**Delivery Hero treats inside information with the highest standards of confidentiality.** Inside information is non-public information concerning the company, which, if it became publicly known, would likely have a significant effect on the price of the company's shares or bonds or on the price of related derivatives.

**As a general rule, we strictly do not undertake or incite insider dealings.** Heroes in possession of inside information must not make use of such inside information when trading with Delivery Hero shares or financial instruments, irrespective of the source of such knowledge.

We care because the misuse of inside information in the market is a criminal offense and hence strictly prohibited. This also applies to inside information relating to other companies which is obtained in the course of work.

The Capital Market Team however cannot assess the qualification of such external information as being inside information.

## When in doubt ask yourself

- if the information you mean to share is public knowledge or only internal use;
- if the information offers you or anyone else an unfair advantage when deciding whether to buy or sell securities.

In case of further questions, employees can find the **Capital Markets Compliance Guidelines** and **Insider List Guidelines** to learn about the rules governing inside information or reach out to our Capital Market Team.



# Our assets

We take our responsibilities to all our stakeholders seriously and do our best to protect the company and its business assets and information.



# 06

# We preserve our reputation with careful communication



**Delivery Hero's corporate reputation is essential to our business success**, since it influences the way we are perceived by partners, customers, investors, employees, potential candidates, authorities and industry influencers. All communications can have an impact on this perception - both in a positive and in a negative way.

Whatever form the communication takes, **we should carefully consider what we want to say**, and we should **communicate transparently and clearly in all situations**.

**We only share company information if we are certain we are permitted to do so**, even among co-workers.

In case of further questions employees can find the **Communications Policy**. We contact our Corporate Communications Team when we are unsure whether any intended social media post meets the company criteria or not.

If we are contacted and asked to discuss company business with any members of the press, investors, or market analysts, we politely advise the outside party that we are not authorized to discuss the subject and refer them to our Corporate Communications Team. This helps ensure that we always provide true and accurate information with respect to our business and services.

**Similarly, when using social media including acting as brand endorsers, employees should let the outside party know that they do not speak on behalf of the company.**

We should all treat company information with care and confidentiality.



# We safeguard our property

During our employment or service, we may create intellectual property such as works or products, including code, images, designs, marketing materials, and documents. **This intellectual property belongs to Delivery Hero and is only used as advised and for the benefit of the company.**

**We handle Delivery Hero's resources and equipment with care.** Company assets are only to be used for explicit business purposes.



## Intellectual property

We protect Delivery Hero's property which includes intellectual property, business strategies, financial data, and other confidential information, as well as physical assets.

**Our ideas, inventions, innovations, and technical know-how are at the heart of our delivery platforms, which makes them extremely valuable assets.**

We always do our best to protect our intellectual property, while treating confidential information belonging to others with the same respect.

Unsure if information can be shared? Reach out to our **Intellectual Property team**.

## Vouchers and benefits

Employees are always welcome to use staff discounts and vouchers for online food ordering, but only in the way intended.

This means that **we do not hand out staff discounts or company vouchers we receive from Delivery Hero to someone else on the staff or someone we know privately because they are non-transferable.**

However, we can place an order from our accounts to treat friends or family members.

Delivery Hero is very happy to provide employees with certain benefits and hopes they make good use of it. However, misusing or manipulating company benefits may result in disciplinary action.

Want to know more about Delivery Hero vouchers and benefits? Visit the **Delivery Hero Benefits Website**.





# Our cyber security



We protect the company, customer and employee data with all reasonable and appropriate technical and organizational measures to safeguard our data from different threats.

We take care to ensure our corporate hardware and software is **used only for business purposes** (Acceptable Use Policy).

We comply with the DH group standards for **responsible deployment of generative digital artificial intelligence technologies** with content creation capabilities such as OpenAI ChatGPT or Google Gemini (Generative AI Policy).

When we suspect a **security incident** or **data breach** is happening or become aware of any situation in which data could be compromised, including the loss or theft of a laptop or handheld device, we report the issue to the Cyber Security Incident Response Team (CSIRT) without delay.





# We protect privacy



**We are aware of the highly sensitive nature of the personal data** of our customers, employees, contractors, shareholders, and suppliers, and handle all such information with the utmost confidentiality and care to protect it in compliance with applicable laws.

**We are responsible for ensuring high standards of data protection** and for following the policies intended to protect personal data and Delivery Hero's information.

**We respect the extensive rights of those individuals whose data we are collecting, processing and using.**

If a breach related to personal data occurs, we immediately reach out to the Data Protection Team.

In case of further questions we look at the **Group Data Protection Policy** and **Information Security Policy**.

**Delivery Hero places the highest importance on ensuring that all information is processed in a lawful, fair, and transparent manner, as this is one of our core responsibilities and this has a significant influence on business success and the company's image among the general public.**

A variety of technical and organizational measures, aimed at ensuring the appropriate protection of personal data, support us in these efforts.

We care because when data that should be kept private gets in the wrong hands, bad things can happen. A breach at our organization can put proprietary data in the hands of a competitor or fraudulent entities.





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