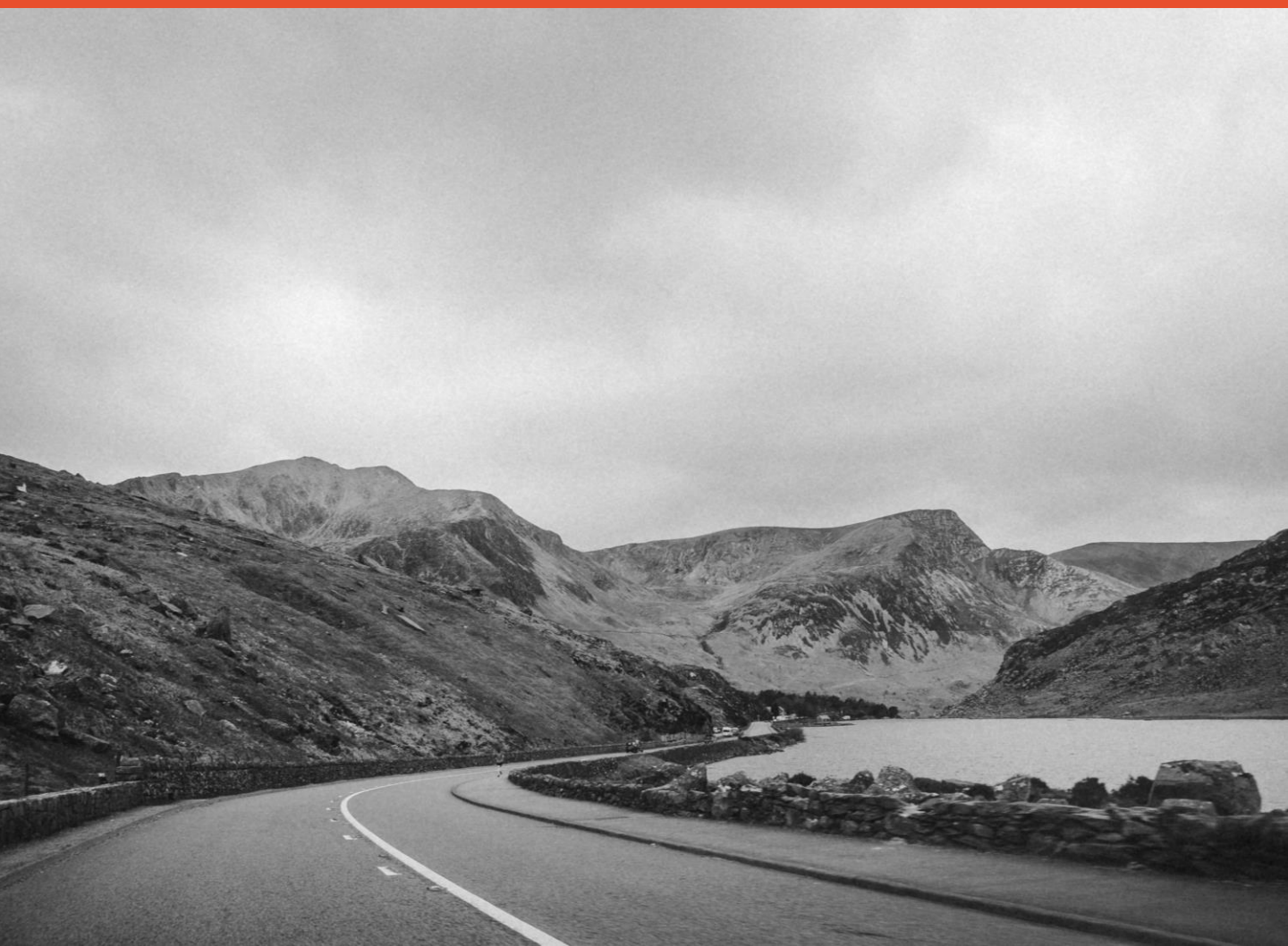




Arkessa Code of Conduct





INTRODUCTION

What is it?

Our Code of Conduct sets out what we value as a company. These principles define who we are, how we work, and what we believe in. It is designed to clearly set out the minimum standards of behaviour we expect from ourselves and those with whom we work with.

We appreciate that many of you who work with us have your own guidelines, so we do not ask you replace those. However, we do ask that you respect our Code of Conduct and align where possible.

Where we refer to “suppliers”, this includes suppliers, sub-contractors and partners.

Who does it apply to?

We expect all of our full time, part time and temporary staff to apply our Code of Conduct consistently.

It is essential that those whom we work with hold similar values to us, act responsibly and operate to the same high ethical standard as those we have adopted.

We expect our suppliers to meet all of the requirements set out within this Code of Conduct and to reflect these principles within their own supply chain.





Andrew Orrock, CEO



'At Arkessa, our values form our core purpose and therefore underpin everything that we do and what we believe in. Maintaining high standards and ensuring that our team, customers, partners and suppliers understand and abide by our values is extremely important to us.

I am proud that we operate a zero-tolerance policy for any form of discrimination, bullying or harassment and I encourage you to challenge any use of unethical, dishonest or questionable behaviour in our organisation.

If you ever have any questions about the right thing to do, or feel that our Code of Conduct is being violated, please be sure to speak up.

It is absolutely critical for us all to adhere to the highest ethical standards. I'd like to personally thank all of our team, customers, partners and suppliers for helping us uphold our values.'

Sincerely,

Andrew Orrock
CEO



HEALTH AND SAFETY

Principle

The safety of our employees and visitors is fundamental. We believe that all injuries can be prevented, and our goal is zero harm.

Why does this matter?

We believe that everyone should be able to do their job or use our services safely. We expect our suppliers to take responsibility for adhering to health and safety best practice.

Working with us

We expect you to provide a safe and hygienic working environment. This includes as a minimum providing drinking water, adequate lighting, temperature, ventilation and sanitation.

Appropriate steps should be taken to prevent accidents and injury to health through appropriate controls and work procedures.

All workers must receive regular, recorded health and safety training.

Emergency response procedures must be in place setting out clearly the action to be taken in the event of an emergency.





FRAUD, BRIBERY AND CORRUPTION

Principle

We will not give or receive bribes, participate in corruption or misuse company property.

Why does this matter?

We have a zero-tolerance approach to fraud, bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings.

What does this mean for you?

You must adhere to all applicable laws, regulations and standards concerning bribery, corruption or fraud.

Never offer, give, or receive bribes or make or accept improper payments to obtain new business, retain existing business, or secure any improper advantage and never use or permit others to do so.

We expect you to adopt and maintain appropriate practices, policies and procedures to prevent bribery and corruption.

GIFTS AND HOSPITALITY

Principle

We ensure gifts and hospitality are reasonable and don't influence a decision.

Why does this matter?

We recognise that appropriate low value gifts and hospitality is generally considered acceptable to foster good will or working relationships. Modest hospitality such as social events or meals may be offered if there is a legitimate business purpose and the cost is reasonable and proportionate.

What does this mean for you?

You must not offer or provide lavish gifts or hospitality, other than those of modest value.

You must report to Arkessa any lavish gifts or hospitality offered by our employees to your own employees.

You must not offer or give cash or cash equivalents to our employees.





CONFIDENTIALITY AND PRIVACY

Principle

We respect everyone's privacy.

Why does this matter?

Data protections regulate the collection, storage, disposal, use and disclosure of personal information such as names, addresses, date of births or job titles, which can identify a living person. Where personal information is collected, held or used, we must comply with the relevant laws.

What does this mean for you?

Only collect the personal information required to fulfil the service you are providing.

Take steps to ensure personal information remains accurate and up to date.

Take all reasonable measures to prevent confidential information from being disclosed to any person who does not need or have a right to that information.



MODERN SLAVERY, HUMAN TRAFFICKING AND CHILD LABOUR

Principle

We respect and protect human rights.

Why does this matter?

We are committed to recognising and preventing human rights breaches including modern slavery, human trafficking and child labour. We have a zero-tolerance approach to any violations.

What does this mean for you?

You must not participate in any form of human slavery or human trafficking and must prohibit the same within your own supply chain.

You must ensure that workers are of legal working age and are not required to hand over passports, ID cards or work permits as a condition of employment and they must be free to leave their employment on giving reasonable notice.

We expect every party who we have dealings with to adhere to the principles of relevant local legislation.





WORKING HOURS, WAGES AND BENEFITS

Principle

We believe workers should be paid fairly and in a timely manner.

Why does this matter?

We believe that everyone should be fairly rewarded for their skill, contribution and performance and not required to work excessive hours.

What does this mean for you?

All of our suppliers' workers, including those within a suppliers' supply chain, must be paid at least a minimum wage in the country of employment.

You must ensure workers are not, except in exceptional circumstances, required to work excessive hours during their working week and are given regular rest days in accordance with local laws and conventions.

DISCRIMINATION, BULLYING AND HARASSMENT

Principle

We have a zero-tolerance approach to any form of discrimination, bullying or harassment.

Why does this matter?

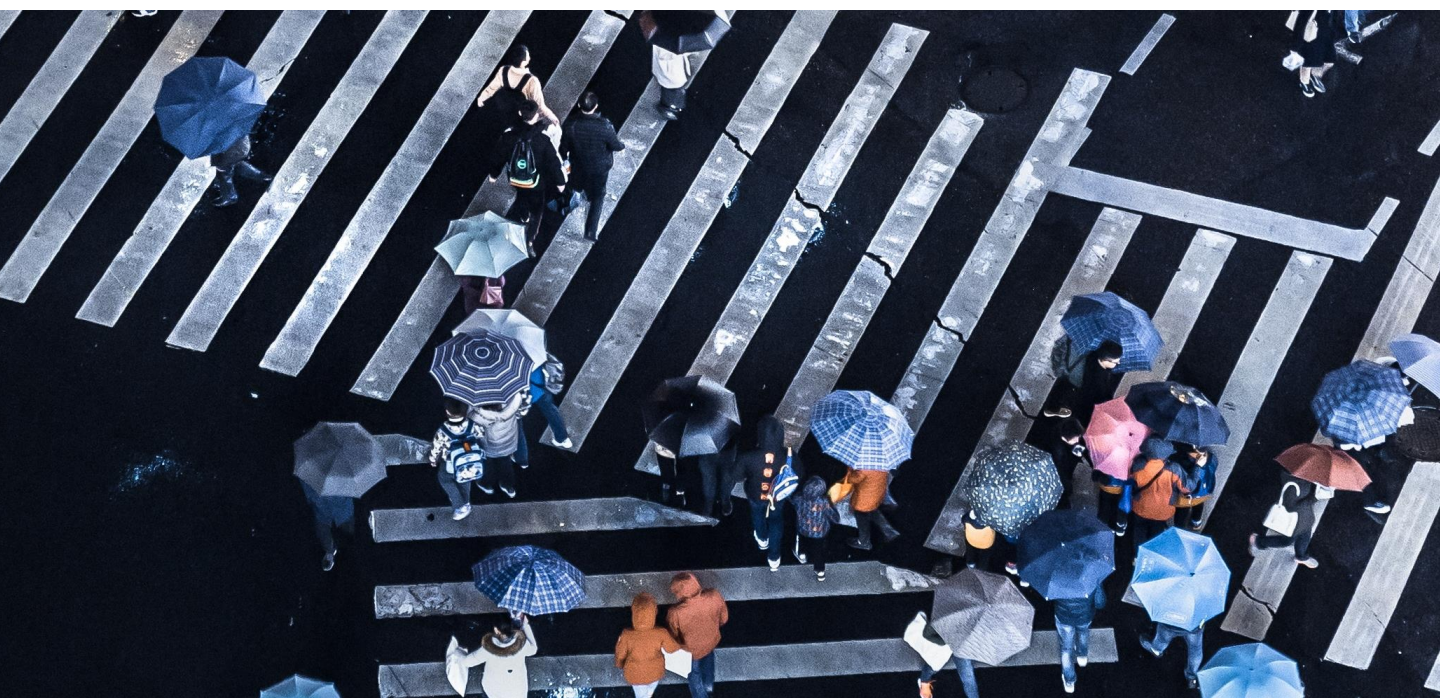
We believe that everyone should be treated with dignity and should feel safe in the workplace. We value and promote difference and diversity and believe everyone is entitled to employment opportunities based on individual abilities and merit.

What does this mean for you?

You must ensure that all workers are treated fairly and equally. For example, suppliers must select workers based on ability and not on any personal characteristics such as sex, race, colour, ethnic origin, sexual orientation, gender identity, pregnancy, religious beliefs, political beliefs, disability or age.

We expect you to adopt a zero-tolerance approach to violence, bullying, intimidation, and abuse at work and to any other form of verbal, non-verbal or physical harassment or discrimination.

You must have clearly defined disciplinary procedures which are effectively communicated to workers and must offer employees a confidential whistleblowing procedure.





ENVIRONMENT

Principle

We care about the environment.

Why does this matter?

We understand the role we play in protecting the world we live in and feel it's important to be conscious of the impact we have on the environment.

What does this mean for you?

You must adopt responsible practices for managing environmental impacts and comply with applicable law and internationally recognised standards.

You must consider the environmental impact of your operations and reduce energy, water and waste wherever possible.





REPORTING CONCERNS

If you are ever asked to be involved in anything which is in potential breach of this Code of Conduct, or is otherwise unethical or illegal, then we encourage you to raise your concerns with your Arkessa contact.

Alternatively, you can raise concerns to an independent whistleblowing charity.

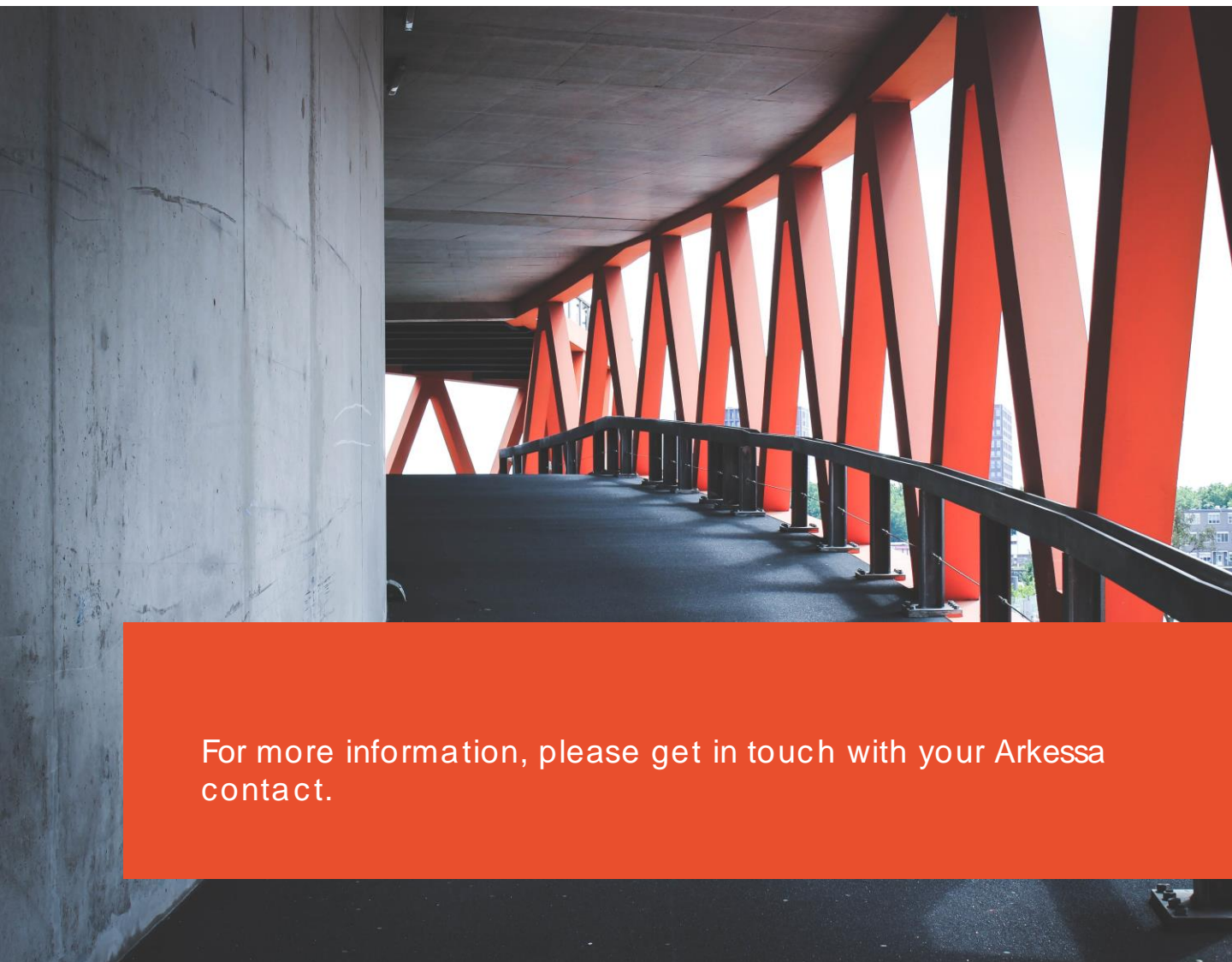
Contact details are:

Helpline - (020) 7404 6609

Email - whistle@pcaw.co.uk

Website - www.pcaw.co.uk

All issues are treated seriously. We will follow them up discreetly and without bias. Anything you raise will be treated confidentially.



For more information, please get in touch with your Arkessa contact.