

## I. General commitment policy

ARCA Regler GmbH (ARCA) is committed to the principles of ethicality, integrity and transparency.

## II. Internal scope of validity

This code of conduct and the principles of the Global Compact Initiative of the United Nations are binding obligations for all employees of ARCA.

## III. External applicability

ARCA equally expects its business partners, customers and suppliers to demonstrate integrity and legally-compliant and ethical conduct which corresponds to the principles of the Global Compact Initiative and the standards below.

## IV. Principles for responsible conduct

ARCA requires that the following cornerstones and standards are observed:

### 1. Compliance with the law

ARCA complies with the laws and other regulations of the countries in which it operates.

### 2. Human rights

ARCA is committed to the promotion of human rights. It upholds human rights according to the UN human rights charter. The following applies in particular:

#### a. Health, safety and personal rights

Our concern is to guarantee a safe and healthy working environment for all our employees, particularly to avoid accidents and injuries and to preserve health. In all its relations with employees and with respect to the individual rights of its employees ARCA is committed to the principles of respectful, fair and non-discriminatory communication.

#### b. Ban on child labour and forced labour

ARCA upholds the core principles of the ILO. It observes the ban on forced labour of any kind and the ban on child labour, i.e. the employment of persons below the age of fifteen years, unless local legislation stipulates higher age thresholds.

#### c. Labour standards and remuneration

ARCA employs and pays its employees on the basis of fair and legally compliant contracts, particularly with respect to the remuneration level, and complies with international minimum standards and labour standards. ARCA complies with working standards with respect to the maximum admissible working hours.

#### d. Employee rights

The rights of employees to freedom of association, freedom of assembly and collective bargaining are respected insofar as is possible and permissible in the respective country.

### **3. Combating corruption**

ARCA rejects corruption and bribery in terms of the corresponding UN convention. It promotes transparency, acting with integrity and responsible leadership and control within the company. All company activities must be honourable and responsible in thought and deed.

### **4. Receiving and guaranteeing of benefits**

All kinds of benefits, gifts and invitations are permissible only if deemed, based on their value, financial context or otherwise, unlikely to influence the actions or decisions of the recipient unduly or impose an obligation on the recipient. The acceptance or granting of gratuities of any kind is not permitted in principle. Admissible benefits are subject to the principles of appropriateness, standard business practice and clear commercial relevance.

### **5. Combating illegal employment and clandestine labour**

ARCA observes the prevailing legislation for employment or personnel and rejects any form of illegal employment and clandestine labour.

### **6. Environmental awareness**

ARCA complies with all environmental protection regulations and standards which apply to its operations at any one time and acts at all its site with environmental awareness. ARCA handles natural resources responsibly. ARCA operates an environmental management system according to DIN EN ISO 14001.

### **7. Quality**

ARCA imposes high standards on its employees in the implementation of its products and services, particularly in terms of creativity, skill and care. It ensures the application of corresponding quality standards. ARCA operates a quality management system according to DIN EN ISO 9001.

## **V. Organisational responsibility and reporting of violations**

The implementation, fulfilment and monitoring of this code of conduct in organisational terms is the sole responsibility of the management. Every employee is able to report violations against the code of conduct or corresponding suspicions to ARCA. Any employee reporting actual violations or suspicions shall not fear disadvantages of any type and will be protected against such disadvantages.

**ARCA Regler GmbH**  
Executive Board