

# Arkadin Code of Conduct Employees







# [ Edito ]

Arkadin is one of the largest and fastest growing Collaboration Service Providers in the world. This success relies on our expertise in the conferencing area, but also on our corporate values, which reflect our integrity and transparency in business, as well as the well-being of our employees.

This Code of Conduct (hereafter the “Code of Conduct”) describes our commitments and expectations in relation with our employees, partners and clients. It expresses our human and business ethics, as well as our compliance with international, national laws and regulations applicable to Arkadin. It encompasses the Arkadin values that influence the way we work, drive our business and develop the relationships with our clients:

Respect, Working Together, Entrepreneurial Spirit and Enjoyment.

We put the trust at the very heart of our business relationships. We want to work with partners who share our commitments and have the same business vision as ours. Furthermore, our company sustains the well-being of all Arkadin employees. Considering ourselves as a human company above all, we ensure that they enjoy their work at Arkadin, act according to the Arkadin values, and apply our commitments.

As a worldwide Service Provider, Arkadin deals with many situations depending on the business practices and local laws. This Code which cannot foresee all the situations, describes therefore our general guidelines. Arkadin relies on its employees to use their judgement and to act with discernment when facing a situation.

Similar Code of Conduct is intended to be presented to all Arkadin employees.

Any entity or contractor entering in a business relationship with Arkadin shall respect the same principles.



# Human

## Labour law



Arkadin considers the human capital as a key success factor, and follows the idea that a happy employee works better and makes a happy customer. As a responsible employer, the company is committed to ensure the well-being of its employees and their professional development by giving them a decent, safe and appropriate work environment. Arkadin ensures its compliance with national and international labour laws and conventions applicable to the company. Work shall be freely accepted and employees shall be free to leave in accordance with established rules.

## Child labour



Arkadin does not tolerate child labour and is concerned by the well-being of children.

The childhood period is a time in which the human is fragile and the child needs a special protection. In this regard Arkadin follows national labour laws and the United

Nations Convention on the Rights of the Child (1989) and expects from its partners the same. If any form of child labour is discovered we will ask our suppliers and their subcontractors to take steps to stop these situations. If a corrective action plan is not set up immediately, Arkadin will end all commercial relations and contracts in progress.

## Harassment



Arkadin rejects every form of abuse, harassment or intimidation, and for whatever motive. Employees shall not receive mental or physical punishments. The managers are responsible for keeping a healthy work environment.

Furthermore, any form of sexually offending behaviour, inappropriate comments or actions that can legitimately be considered as offensive or discriminatory must be reported. Every offender shall be subject to a disciplinary sanction as well as any sanction provided by the applicable labour law, up to dismissal if necessary.

## Diversity and equal opportunities



Diversity and equal opportunities are important Arkadin values. Our company recognizes and respects cultural differences. The diversity of our staff is one of our strengths and makes us a stronger organization. The company is firmly committed to maintaining a healthy and safe work environment without any discrimination.

Our French office signed an agreement with employee representatives in order to educate and inform on disability in order to fight against exclusion, as well as to recruit disabled employees and give everyone the same professional opportunities.

The fight against discrimination extends to all employees in all situations from recruitment to dismissal, and all decisions are taken only with reference to skills and results. Discrimination based on racial origin, gender, age, religious belief, membership in a trade union, handicap, and sexual preference or any others reason are unacceptable.



# Business

## Anti-bribery and Competition



Arkadin complies with the trade laws of every country where it operates, and is aware that anticompetitive practices like bribery and buying of favours are common in certain countries. The sales team must act carefully by dealing in such countries. Each salesperson commits that every business transaction is handled with loyalty and transparency.

Arkadin also complies with anti-bribery and corruption laws and regulations. The company ensures that its employees, partners and clients share the same commitment. Bribes like kickback or facilitation payment are not tolerated and must be immediately reported to the manager. Extreme caution is needed with gifts or other benefits, such as events without direct business relevance. In order to prevent a bribery situation, Arkadin employees and officers shall act with discernment, and always report to the Compliance department in case of any doubt. For more information about Arkadin anti-bribery policy, please refer to:

<http://terms.arkadin.com/Anti-Bribery-Policy-2018.pdf>

## Selection of partners



With this Code of Conduct, Arkadin intends to maintain trustful and transparent relationships with its business partners. Arkadin also ensures that they apply the same work ethics. Suppliers are selected on the same commitments described in this Code of Conduct. Arkadin will clearly communicate these expectations before taking any contractual engagement. Any indications that a business partner does not comply with applicable laws or this Code of Conduct must be reported in order to evaluate the sustainability of the relationship. Arkadin will clearly communicate these expectations before taking any contractual engagement. Any indications that a business partner does not comply with applicable laws or this Code of Conduct must be reported in order to evaluate the sustainability of the relationship.

## Intellectual property



Arkadin's know-how and intellectual property is the core of our expertise and contribute to our competitive position in the collaborative services business area. The whole company staff has to ensure a secured access to such elements.

Arkadin is likewise committed to not use third party's intellectual property without proper authorization. We ensure that any element of intellectual property is used with prior authorization of its owner.



# Security

## Confidentiality & Data protection



Arkadin holds all information relating to business affairs, clients and suppliers, in confidence and safety. Such information is important for us and for our development. In addition, all the means available must be deployed to ensure confidentiality. No information should be disclosed to third parties except if required by employee's job duties or specifically allowed by the disclosing party. Employees shall not use confidential information, neither for personal benefit, nor for any other purpose than the one for which he has been given access to such confidential information. All employees shall report the loss or theft of confidential information.

Arkadin is strongly committed to protect personal data. Privacy and data protection are fundamental freedoms for our clients and an undeniable trust factor for Arkadin. Arkadin collects, stores and processes personal data for business purposes and legal reasons. Arkadin undertakes to process these personal information in accordance with applicable data protection laws and regulations including the EU General Data Protection Regulation (GDPR).

For more information about Arkadin data protection policy, please refer to:

<http://terms.arkadin.com/privacy-white-paper-2018.pdf>



# Society

## Environment



Environment is subject to particular attention. By providing collaborative services, Arkadin contributes to reduce clients and companies environmental impact. We respect all environmental laws, rules and regulations by efficient use of energy and natural resources.

Arkadin minimizes its impact on nature and promotes sustainable development.

In order to achieve this, all employees are encouraged to become aware of the ecology principles and to act responsibly in the day to day work. This applies particularly to printing, using paper, optimizing the temperature of our offices, and travelling.

The hardware and the office installation are set up to reduce the environmental impact.

## Legal compliance



Arkadin is an international company operating in many countries throughout the world. The company is subject to different local, national and international laws and regulations. All acts, measures and contracts applicable to our operations and business activities must respect the principle of legal compliance.

All employees are responsible for the observance of the legislation in their working environment. When in doubt, they must consult the legal department. Each employee must comply with the applicable legislation.

## Conflict of interest & politic



Every employee can engage in a political or union activity in addition to his work at Arkadin. Such activities are strictly personal and do not involve Arkadin in any way. Moreover, some activities are not appropriate when working at Arkadin, due to a potential conflict with our interests. The employees shall neither be in position of committing an insider trading, nor irregularly increasing Arkadin's competitive position. In case of any doubt, they must report to their manager.

The same precaution is required for employees whose personal environment is involved in such activities that create a conflict of interest with Arkadin business activity.

## Image and communication



Corporate reputation is important for Arkadin and its financial health. All employees are to be an example in all the circumstances, everywhere and in all social situations.

These principles must also apply to the use of new interactive communication tools, mainly the social networks like Facebook, Twitter or YouTube.

They are to be used responsibly, in areas of both private and public life, in a way fully compatible with the Arkadin values.

The company does not tolerate the use of aggressive or insulting language and hateful words. Except if within the scope of employee's functions, only the marketing department is authorized to communicate directly with the customers, media, public and regulators.





## Compliance with the code of conduct

In everyday work life, employees and representatives of Arkadin and its partners shall respect this Code of Conduct. The compliance with this Code of Conduct is a matter of cardinal importance for Arkadin, its shareholders and clients. All offences against Code of Conduct rules by Arkadin employees or partners should result in a sanction including disciplinary measure and/or administrative penalty.

Each employee and representative of Arkadin or its business partners may contact Arkadin compliance department for any question about this Code of Conduct on the following e-mail:

**[compliance@arkadin.com](mailto:compliance@arkadin.com)**

Arkadin whistle blowing contact point:

If an Arkadin employee, external or occasional co-worker becomes aware of any misconduct or scandal (including any illegal act, such as a violation of law, or any other act contrary to Arkadin Code of Conduct) or any suspicion thereof, this employee, external or occasional co-worker shall promptly report this fact to his/her superior. If this person is unable to report the fact to his/her superior, a report system for the collection of alerts has been implemented and, in order to ensure the maximum level of confidentiality, an e-mail address has been established to contact the compliance department:

**[compliance@arkadin.com](mailto:compliance@arkadin.com)**

The compliance department will provide an independent and impartial investigation for each reported issue. An employee who has reported a case to the compliance department will never receive unfavourable treatment by Arkadin because of such report. Arkadin will take measures where necessary to prevent the reporting employee from being treated unfavourably.

NTT additional whistle blowing contact points for Arkadin's employees: NTT Compliance hotline operated by NTT Com: [compliance@ntt.com](mailto:compliance@ntt.com). NTT Group wide Corporate Ethics Help line operated by external law firm: [helpline@torikai.gr.jp](mailto:helpline@torikai.gr.jp). Reports received at the external law firm will be informed to NTT Com without disclosing personal information of the reporter. The Compliance Committee Office of NTT Com will investigate the issues obtained either at NTT Compliance hotline or from the Corporate Ethics Help line.

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