

# Code of conduct

## 1. Corruption / Anti-Trust Law / Forced Labour / Child Labour

### a) Corruption

In dealing with business partners (customers, suppliers) and state institutions, the interests of the company and the private of employees on both sides are to be kept strictly separate. Actions and (purchasing) decisions are to proceed independent of considerations which do not concern the business at hand and which involve personal interests.

Current anti-corruption criminal law is to be upheld. Among other things, the following is to be observed:

#### **Criminal Acts in Dealings with Public Officials**

The granting of personal advantages (in particular benefits in kind such as payments and loans, including the giving of smaller gifts over a longer period of time) by signing / acceding companies and their employees to public officials (such as civil servants or public employees) with the objective of gaining advantages for the signing / acceding company or oneself or for third parties, is not permitted.

#### **Criminal Acts in Business Dealings**

Personal benefits in kind in exchange for a favoured position in business dealings may not be offered, promised, granted or approved. Nor may personal benefits be demanded or accepted in dealings with business partners. arco must require from its employees that they will not allow any such benefits to be promised to them.

The management and employees of a signing / acceding company are not allowed in the course of business dealings to offer, promise, demand, give or accept gifts, payments, invitations or services that are provided with the aim of influencing a business relationship in a prohibited way or with whom there is the risk of jeopardising the professional independence of the business partner. This generally does not apply to gifts and invitations that fall within the bounds of normal business practice with regard to hospitality, convention and courtesy.

The signing / acceding company can issue a binding policy with regard to the giving and receiving of gifts, invitations to business entertainment and events. This policy can specify exceptions with respect to appropriate gifts of small value and of a symbolic nature, reasonable business meals and reasonable company events as well as those of business partners (customers, suppliers)

## **b) Conduct vis-à-vis Competitors (Anti-trust Law)**

arco respects fair competition. Thus arco adheres to existing laws that uphold and promote competition, in particular prevailing anti-trust laws as well as laws that regulate competition.

In dealing with competitors, these provisions in particular prohibit collusion and other activities aimed at influencing prices or conditions, dividing up sales territories or customers or using prohibitive means to inhibit free and open competition.

Furthermore, these provisions prohibit agreements between customers and suppliers by which customers are to be enjoined in their freedom to autonomously determine their pricing and miscellaneous conditions when reselling (determination of pricing and conditions).

## **c) Forced Labour**

arco company rejects every form of forced labour.

## **d) Child Labour**

arco respects the regulations of the United Nations on human rights and children's rights. In particular, arco commits to complying with the Convention concerning the minimum age for admission to employment (Convention No 138 of the International Labour Organization) as well as the Convention concerning the prohibition and immediate action for the elimination of the worst forms of child labour (Convention No 182 of the International Labour Organization). If a national regulation concerning child labour provides for stricter measures, these shall have precedence.

## **2. Principles promoting Social Responsibility**

### **a) Human Rights**

arco respects and supports compliance of internationally-recognized human rights.

### **b) Discrimination**

arco commits, within the scope of prevailing laws and statutes, to opposing all forms of discrimination. This applies in particular to unfair treatment on the basis of gender, race, disability, ethnic or cultural origin, religion or world view, age or sexual orientation.

### **c) Health Protection**

arco guarantees protection of workers in the workplace and workplace health protection within the scope of national provisions. The signing / acceding company supports continuous advancement of this process towards improvement of the working environment.

#### **d) Fair Working Conditions**

arco respects its employees' right of association within the bounds of prevailing laws and statutes.

#### **e) Environmental Protection**

arco is committed to sustainably upholding the goal of environmental protection for current and future generations. Laws passed for the protection of the environment are to be obeyed. The signing / acceding company is to support environmentally-minded actions on the part of its employees.

#### **f) Company Secrets**

arco commits its employees to safeguarding trade and company secrets. It is forbidden to divulge confidential information, as well as confidential documents, to third parties without proper authorization or to provide other forms of access to them, unless proper authorization has been granted or it has do with publicly available information.

#### **Suppliers**

All suppliers of arco are requested to follow this Code of Conduct.