



CODE OF CONDUCT FOR THE ARRK GROUP

We have decided to establish and communicate the ARRK Code Conduct. This is to establish better relationships with our stakeholders and to strengthen the group's sound and sustainable corporate value by offering complete transparency throughout the ARRK Group.

1. Basic Posture

ARRK Group is aiming at being a creative and people-based company that pursues social development and welfare of people supporting ARRK Group. Based on this principal, ARRK Group is carrying out its operations while respecting each employee's creativity and individuality.

Additionally, whilst encouraging individuality and enthusiasm, the ARRK Group shall provide improved quality and value-added services and pursue social development and welfare of everyone supporting ARRK Group. Sense?

2. Compliance

ARRK Group shall ensure regulatory compliance and give the highest priority to regulatory compliance in our business activities.

2.1 ARRK Group shall comply with laws and regulations in each country and region as well as compete fairly and freely with decency.

2.2 ARRK Group shall establish and operate the systems for ensuring the compliance of the performance of directors' and employees' duties according to the laws and regulations and the articles of incorporation and the systems for ensuring the appropriateness of the performance of the Group.

2.3 ARRK Group shall respect basic human rights of all people and avoid discriminations or human rights violations based on race, creed, sex, social status, family origin or disability.

2.4 ARRK Group shall only conduct business within the Group or third party which complies with the Groups ethical interests.

2.5 ARRK Group shall recognize that it is a multinational group and comply with import/export laws and regulations in each county and region for keeping international peace and security.

2.6 ARRK Group shall keep accurate accounting records and reports in compliance with applicable laws and regulations and fair accounting practices.

ARRK Europe Ltd

Nuneaton Technical Centre, Caldwell Road, Nuneaton, Warwickshire, CV11 4NG, UK.

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2.7 ARRK Group shall prevent leaks of confidential information by adequately acquiring and managing information in accordance and compliance with applicable laws and regulations.

2.8 ARRK Group shall establish and maintain a system and a corporate culture that bad news would be reported immediately and preferentially, based on the concept that “Bad news is Good news”.

3. To Our Customers

3.1 ARRK Group consistently provide a higher quality and value-added product development support services.

3.2 ARRK Group recognise the importance of confidentiality to our customers as most important to our business and strive for upgrade information security systems and levels of security protection.

3.3 ARRK Group shall keep transparent and fair relations with our customers and conduct ethical and honest business activities.

4. To Our Business Partners (Subcontractors and Procurement Sources)

4.1 ARRK Group shall maintain equal and fair relations with all our business partners and conduct ethical and honest business in accordance with all laws and contracts.

4.2 ARRK Group shall conduct ethical business only and will not tolerate unfair discounting or the abuse of its dominant negotiating position with any business partner.

4.3 ARRK Group will promote fair procurement practices and will not accept unethical gratuities or any other benefits with regard to procurement.

5. To Shareholders and Investors

5.1 ARRK Group shall disclose timely and appropriately all business information of ARRK Group in accordance with applicable laws and regulations.

5.2 ARRK Group shall not trade stocks or other securities using undisclosed important information which could be known in connection with duties and operations.

5.3 ARRK Group shall establish internal control systems to ensure the accuracy of our financial reporting and will strive to continuously improve the systems in accordance with applicable laws and regulations.

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6. To Society

- 6.1 ARRK Group shall respect cultures and customs in each country and region and conduct business which will further aid their development.
- 6.2 ARRK Group shall operate the environmental management system which will prevent and reduce any environmental contamination to society caused by produce development.
- 6.3 ARRK Group shall strive to prevent contamination globally in compliance with environmental laws and regulations in each country and region aiming to meet the requirements of its customers and others.
- 6.4 ARRK Group shall avoid any relations with anti-social organisation, refuse any unreasonable demands from them and conduct no promotion of their activities.

ARRK Group Code of Conduct – March 2021

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