

# CODE OF CONDUCT FOR THE ARRK GROUP

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

## 1. INTRODUCTION

The ARRK Group strives to be a creative and people-based Company promoting the social development and welfare of everyone supporting the ARRK Group. Based on this principle, the ARRK Group will carry out its business while respecting each employee's creativity and individuality.

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

## 2. COMPLIANCE

The 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 all the laws and regulations applying to each country and region as well as conducting its business ethically and freely.
- 2.2. ARRK Group shall establish and operate systems to ensure the compliance of the performance of its directors and employees according to the laws and regulations in each country and region. In addition, these ethical systems will be put in place to ensure the Group performs in an appropriate manner.
- 2.3. ARRK Group shall respect the basic human rights of all people and avoid discrimination or rights violations based on race, creed, sex, age, social status, family origin or disability.
- 2.4. ARRK Group shall only conduct business within the Group or with a third party which complies with the Group's ethical interests.
- 2.5. ARRK Group shall appreciate that it is a multi-national group and must comply with national and regional import and export laws and regulations to maintain and nurture international peace and security.
- 2.6. ARRK Group shall keep accurate accounting records and reports in compliance with all applicable laws and regulations and fair accounting practices.
- 2.7. ARRK Group shall prevent leaks of confidential personal information by adequately acquiring and managing information in compliance with applicable laws and regulations and internal rules.
- 2.8. ARRK Group shall establish and maintain a system and a corporate culture that bad news would be reported immediately and preferentially, based upon the concept that "bad news is good news".

### **3. TO OUR CUSTOMERS**

The ARRK Group will:

- 3.1 Consistently provide the highest quality and value-added product development support services.
- 3.2 Recognise the importance of confidentiality to our customers as critical to our business and strive to upgrade information security systems and levels of security protection.
- 3.3 Keep transparent and fair relations with our customers and conduct ethical and honest business.

### **4. TO OUR BUSINESS PARTNERS (Sub-contractors and Procurement Sources)**

The ARRK Group will:

- 4.1 Maintain equal and fair relations with all its business partners and conduct ethical and honest business in accordance with all laws and contracts.
- 4.2 Conduct ethical business only and will not tolerate unfair discounting or the abuse of its dominant negotiating position with any business partner.
- 4.3 Promote fair procurement practices and will not accept unethical gratuities or any other benefits with regard to procurement.

### **5. TO SHAREHOLDERS AND INVESTORS**

The ARRK Group will:

- 5.1. Disclose timely and appropriately all business information for the ARRK Group in accordance with applicable laws and regulations.
- 5.2. Not trade stocks or other securities using undisclosed important information which could be known in connection with duties and operations.
- 5.3. Establish internal control systems for ensuring the accuracy of our financial reports and will strive to continuously improve the systems in accordance with applicable laws and regulations.

### **6. TO SOCIETY**

The ARRK Group will:

- 6.1 Respect cultures and customs in each country and region and conduct business which will further aid their development.
- 6.2 Establish and operate an environmental management system which will prevent and reduce any environmental contamination to society caused by product development.
- 6.3 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.
- 6.4 Avoid any relations with anti-social organisations, refuse any unreasonable demands from them and conduct no promotion of their activities.