

ETHICAL BUSINESS CONDUCT CODE

This document provides details of the Code of Corporate Responsibility and Business Ethics applicable to all Artedas businesses worldwide

| WHY DO WE NEED A CODE?

As a global company, Artedas interfaces with customers and suppliers all over the world. These groups, together with other organizations and individuals with which our businesses interact, take a close interest in what we do. Their opinions about Artedas are influenced by our actions. A good reputation is not just important, it is essential to our ongoing success.

A key determinant of this reputation is how we all behave – both as individuals and collectively. In a complex world, it is impractical to set specific rules and regulations to cover every situation.

This Code of Business Ethics provides clear standards and guidance for the business dealings of every employee. The Code outlines the standards that we must all attain and covers a range of different areas of activity.

Whilst it cannot deal with every circumstance, it creates a framework to help us decide how to behave. The Code is designed to help set our interactions with colleagues and external *stakeholders* on strong ethical foundations.

Our objective is not only to protect the reputation of our company, but also to protect the interests of every employee by ensuring individual legal and regulatory compliance as well as responsible behavior. In conclusion it is vitally important that Artedas is, and can be seen to be, a responsible and ethical participant in its operating markets around the globe.

| ARTEDAS' CODE OF ETHICAL BUSINESS CONDUCT

The Code applies to all businesses and employees of Artedas worldwide. Compliance with the Code helps to sustain and enhance the good reputation of the Company. We believe that every employee plays their part in building and strengthening the Company as a whole. Artedas and all subsidiaries will conduct its business honestly and ethically wherever we operate in the world.

1. COMPLIANCE WITH LAWS

- Artedas, its employees, representatives and VARs, are required, as a minimum standard, to comply with all the laws and regulations of the countries in which they operate.

2. COMPETITION

- Artedas believes in competing fairly and actively in all its markets. Artedas does not engage in, nor is it party to anti-competitive agreements, business practices or conduct.
- Artedas recognizes the importance of lawfully collecting information on its competitors. However, employees should obtain that information in a professional and ethical manner and avoid any perception of improper behavior.
- Artedas never obtains information about a competitor – directly or indirectly- through the use of unlawful or unethical means, such as misrepresentation, deception, theft, espionage, bribery, or by requesting improper disclosure by a competitor's employees, suppliers, or clients.
New hires keep their previous companies secrets. Artedas does not ask employees who have worked at competitors for confidential or proprietary information. Information about prior work experience is kept private.
- Gathering competitive information has strict rules. The improper collection or use of competitive information, no matter how insignificant, could subject employees and the company to criminal and civil liability.

3. PROPER BUSINESS BEHAVIOR

- Artedas expects its employees to act with integrity at all times to safeguard the trust in which Artedas is held by its customers, suppliers and other individuals and organizations with which our businesses interact.
- No employee shall engage in personal activities or pursue financial or business interests which might lead to, or appear as, conflicts of interest with Artedas, or which might compromise their ability to meet the responsibilities of their job.
- Artedas does not offer, promise, give, demand or accept bribes or other unethical advantage in order to obtain, retain or give business or other advantage.

- Artedas has guidelines on the giving and receiving of benefits that could improperly influence decision making. The stipulation is that they should be conducted correctly, honestly, and in ways that are certain not to cause condemnation or loss of reputation. Gifts received by Directors are generally retained within the company or distributed among office staff.
- Procurement is to be conducted according to Artedas' guidelines and should be fair to all involved. Procurement decisions are to be made on the basis of reasonable prices, quality, and service, and should stand scrutiny if an investigation occurs.
- Government transactions must not be such as to persuade the government or government officials to do anything wrong or inappropriate. Mutual acknowledgement and building relations, within the proper bounds and normal practices, such as offering congratulatory messages and flowers on public occasions is acceptable.
- Artedas' employees who have access to privileged information (including proprietary and confidential information, whether belonging to Artedas or others) must not use it to achieve personal gain for themselves or others.
- Artedas' employees must ensure proper and responsible use of all Artedas' assets, including physical property, intangible assets, IT equipment and communication resources.

4. CONFIDENTIALITY

- Artedas' employees, agents, representatives, and VARs will often come into contact with, or have possession of, proprietary, confidential or business-sensitive information and must take appropriate steps to assure that such information is strictly safeguarded. Artedas' employees, agents, representatives, and VARs shall maintain the confidentiality of information entrusted to them by Artedas and any other confidential information about the company that comes to them, from whatever source, in their capacity as an Artedas employee, agent, representative, or VAR, except when disclosure is authorized or legally mandated. This information — whether it is on behalf of the company or any of its clients or affiliates — includes all non-public information relating to Artedas and any other Artedas or Client information marked as confidential or proprietary.
- Confidential information could include (but not be limited to) strategic business plans, operating results, marketing strategies, customer lists, personnel records, upcoming acquisitions and divestitures, new investments, and manufacturing costs, processes and methods. Proprietary, confidential and sensitive business information about this company, other companies, individuals and entities should be treated with sensitivity and discretion and only be disseminated on a need-to-know basis.
- No Artedas employee, agent, representative, or VAR shall use confidential information for his or her personal benefit.
- No confidential information shall be used by any Artedas employee, agent, representative, or VAR to benefit persons or entities outside Artedas unless it is done so in accordance with a contractual agreement approved by Artedas.

5. DEALING WITH SUPPLIERS, BUSINESS PARTNERS AND CUSTOMERS

- Artedas suppliers are paid promptly within agreed terms of business.
- Artedas seeks to provide its customers with products and services, which meet or exceed their requirements, through the application of quality management systems and continuous improvement programs. These are designed to develop and apply innovative ideas, to respond quickly to changing customer demand and to continually improve product quality, value and delivery times.
- Artedas believes in working in partnership with its suppliers, so as to meet the expectations of its customers, and to ensure quality, value and timeliness throughout the supply chain.
- Artedas' employees must respect and treat in accordance with agreed terms, the technology, intellectual property, confidential information and any other assets or data received from customers, suppliers and others.
- Artedas expects agents, suppliers and others working on its behalf to act lawfully and ethically, and in accordance with the values and standards set out in this Code.

6. EMPLOYEES

- Artedas recruits, selects, and promotes employees on the basis of their qualifications, skills, aptitude and attitude.
- In employment related decisions, Artedas complies with anti-discrimination requirements in the relevant jurisdictions concerning matters of race, color, national origin, gender, marital status, sexual orientation, religious belief, age or physical or mental disability.
- All Artedas employees shall be treated with respect and dignity. Accordingly, any harassment or bullying is unacceptable.
- Artedas nurtures a professional environment where people grow and succeed. Harassment in any form based on sex, race, color, national origin, disability, religion or sexual orientation is unacceptable and may expose Artedas and its employees to legal liability.
- Artedas respects the rights of each employee to join or not join a trade union or other employee representative organization.
- Artedas believes in good communications with employees and in promoting consultation, cooperation and teamwork on matters of mutual concern.
- Artedas regularly evaluates its work-life programme to ensure it meets employees' needs.

7. HEALTH, SAFETY, SECURITY

- Artedas is committed to conducting all its activities in a manner which achieves the highest practicable standards of health and safety.
- Artedas seeks to protect its employees, physical assets, information and reputation from potential security threats.

8. ENVIRONMENT

- Artedas is committed to ensuring that, as far as reasonably practicable, any detrimental effects of its activities, products and services upon the environment are minimized.

9. PUBLIC ACTIVITY

- As and when appropriate, Artedas engages with governments, government departments, agencies and other organizations in relation to issues which affect its legitimate business interests, either directly or through trade associations or other similar bodies.

10. HUMAN RIGHTS

- Artedas seeks to uphold all internationally recognized human rights wherever its operations are located.
- Artedas adheres to all relevant government guidelines designed to ensure that products are not incorporated into weapons or other equipment used for the purposes of terrorism or abuse of human rights.

11. REPORTING AND INTERNAL CONTROLS

- Artedas records all business transactions accurately, prudently and transparently, in compliance with the accounting policies as detailed in the Artedas Annual Report & Accounts and in accordance with best practice.
- Comprehensive assessment and management of risk, together with strong systems of internal control, are essential aspects of Artedas structure and serve to ensure that it is managed effectively and that reported results are accurate.

12. APPLICATION AND COMPLIANCE

- This Code applies throughout Artedas and to all its employees world-wide. It is translated where appropriate, is provided in hard copy by the Human Resources Department. Disregard or breach of the Code by an employee may result in disciplinary action.
- This Code is not intended to replace existing Artedas policies. It serves as a governing document to which other policies must adhere.
- Where Artedas is a participant in any joint venture or commercial sharing arrangement, Artedas seeks, as far as practicable, to ensure that the combined vehicle complies with this Code.
- Artedas expects and encourages employees to bring promptly to management's attention any suspected or actual breaches of this Code.
- Any employee disclosing such information will not face any adverse or unfavorable treatment.
- Violation of this Code of Ethical Business Conduct can result in discipline, including possible termination

13. OBTAINING ADVICE

- Any queries, requests for guidance or reports of alleged breaches in relation to this Code can be raised through your supervisor or line manager or directly with the Human Resources Department.