



Code of Conduct for Suppliers of the ARKADIA TRANSLATIONS Group

Arkadia Translations Group is a leading European company in the field of translations, localisation and interpretation services covering every language combination in the world. Arkadia Translations Group has two companies: Arkadia Translations SRL with registered office in Milan for Italian customers and Arkadia Translations SPRL with registered office in Brussels for international customers. Arkadia is highly specialised above all in the following specific sectors: legal, finance, insurance, communications, marketing and website localisation.

We are fully aware of our responsibility not only towards our customers, partners and employees but also to the communities where we work. That is why we have established strict ethical standards that we follow in everything we do.

All our suppliers (intended as any company that has commercial dealings or supplies goods and services to the two companies of Arkadia Group) and our collaborators (translators, interpreters, proofreaders, typesetters and any experts or consultants who provide services to Arkadia Group) shall comply with Arkadia Group's ethical standards. To attain this goal, Arkadia Group has established this Code of Conduct addressed to all its suppliers. This Code of Conduct establishes the minimum standards for the negotiation and management of contracts with any company or division of the Group.

Applicable Laws and Ethical Standards

The supplier shall comply with all applicable laws in order to carry out its work in a correct and proper manner. The supplier shall uphold the principles of the United Nations Global Compact and Universal Declaration of Human Rights, and those of the Declaration on Fundamental Principles and Rights at Work issued in 1998 by the International Labour Organization, in accordance with the laws and the legal practices followed in different countries. In particular, the above is applicable to:

Arkadia Translations srl P.Iva / C.F. 02717560169 - Cap. soc. Euro 10.000,00 i.v. Registro Imprese di Bergamo n° 02717560169

Via Ampère, 30 - 20131 Milano - Tel. 0039 02 70639498 Fax 0039 02 70605091 www.arkadiatranslations.it info@arkadiatranslations.it

Human rights and fair labour practices

Child labour

The supplier shall not employ any employee under the minimum working age established by the laws of any national or local jurisdiction. If this is not established, the minimum working age is intended as 15 years of age. Employees under the age of 18 will work exclusively in accordance with applicable legal requirements (for example working hours and conditions) and subject to any other educational and vocational training requirements.

Forced labour

The supplier shall not use forced, bonded or involuntary labour. Any form of work must be voluntary. Workers should be authorized to maintain control over their identification documents (e.g. passports, work permits or any other personal legal document). The supplier shall ensure that employees do not pay any sum or make any payment in order to obtain a job throughout the recruitment process and during the period of employment. The supplier will pay all commissions and expenses related to workers, where this is required by law.

No form of mental and/or physical punishment and coercion shall be permitted or tolerated. The disciplinary policies and procedures should be clearly established and communicated to workers.

Salary and working hours

The supplier shall comply with all applicable laws and mandatory industry regulations relating to working hours, overtime, salaries and contributions. The supplier shall make payments to workers promptly, clearly indicating the calculation basis for such salaries.

Salary deductions may not be made as a disciplinary measure, other than as permitted by law.

Freedom of association and collective bargaining agreement

The supplier's employees shall be free to join any trade union/employee association of their choice, without threats or intimidation. The supplier recognizes and respects the rights of employees to a collective bargaining agreement pursuant to the laws in force. other characteristic protected by law.

Diversity

The supplier will encourage a supportive work environment that values the diversity of employees. The supplier will not discriminate nor tolerate any form of discrimination in relation to sex, race, religion, age, disability, sexual orientation, national origin or any other characteristic protected by law.

Health and Safety

Suppliers are expected to exert their best efforts to ensure a high standard of workplace health and safety through an approach to the management of workplace health and safety that is appropriate to the company.

The supplier should comply with the applicable laws and regulations on workplace health and safety, guaranteeing a safe and healthy workplace, in order to protect the health of employees, protect third parties and prevent any risk of accidents, illness and injuries. This includes a regular workplace risk analysis and the introduction of appropriate precautionary and hazard control measures. Employees should be appropriately trained and instructed on health and safety matters.

Data protection and disclosure of information

The supplier shall comply with applicable data protection and security laws, and the respective regulations, above all as regards the personal data of customers, consumers, employees and shareholders. The supplier shall comply with all the above obligations when collecting, processing, transmitting or using personal data. Suppliers should protect and use confidential information in an appropriate manner, for example by undertaking not to disclose any information that is not in the public domain.

Bribery and corruption

The supplier shall comply with all applicable national and international anti-bribery and anti-corruption laws and regulations. In particular, the supplier acknowledges that Arkadia Translations does not tolerate the payment of bribes or kickbacks. The supplier shall not offer or promise (directly or indirectly) anything of value in order to illegally influence an official act or gain an improper advantage in order to obtain or maintain a business relationship.

Trade regulations

The supplier shall comply with all applicable trade and import regulations, including any sanctions and embargoes enforced against its activities.

Money laundering and financial records

The supplier shall comply with applicable laws and regulations to combat money laundering. The supplier will keep financial records and statements in accordance with international laws and regulations.

Fair competition

The supplier shall comply with applicable competition and anti-trust laws.

Conflict of interest

A conflict of interest is said to exist when a person has a private/personal interest that may influence his/her decisions. Conflicts of interest include a family or marriage relationship, partnerships, associations or commercial investments. The supplier will communicate the existence of any actual or potential conflict of interest to the staff of Arkadia Translations.

The Environment

The supplier shall comply with all applicable laws, regulations and environmental standards, and introduce an effective system to identify and eliminate potential risks to the environment.

Suppliers are also expected to consider climate protection in the context of their business activities, for example by establishing and attaining their own climate protection goals.

Our suppliers must also guarantee their commitment to:

- Providing highly energy-efficient products and services, and materials that are energy-saving or emit low levels of greenhouse gases
- Improving their production process, with particular attention to energy efficiency and reduced emission of greenhouse gases
- Promoting the use of renewable energy sources

As part of the “Arkadia Sustainable Project: 2gether for 1 future” initiative, the Arkadia Group is committed to restricting the level of CO2 emissions released into the world directly by its own activity and by that of third parties throughout the entire work chain. Arkadia encourages its suppliers to monitor their CO2 emission levels, taking steps to reduce these where possible.

Notification to business partners

The supplier shall encourage its own suppliers to comply with this Code of Conduct for Suppliers as part of their respective contractual obligations.

Compliance with the Code of Conduct for Suppliers

Arkadia Translations Group reserves the right, subject to reasonable prior notice, to verify that its suppliers comply with the provisions of this Code of Conduct. The Group encourages its suppliers to implement their own guidelines on ethical behaviour.

Supplier’s breach of the provisions of the Code of Conduct will give Arkadia Translations Group the right to withdraw from the contract with immediate effect.

Katya Aricci
CEO
Arkadia Translations SRL