

Archirodon Code of Ethics & Conduct

October 2023



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MESSAGE FROM THE CHIEF EXECUTIVE

In Archirodon Group of companies (“Archirodon” or the “Group”), we envisage fostering a culture where everyone behaves responsibly, makes the right decision and does the right thing, leaving a positive legacy for the years to come. With Ethos being an inherent element of our values, all our business activities are conducted having ethics and compliance at the forefront. Ethical behavior is not just a company policy; it is the cornerstone of our success and the legacy we leave for future generations.

We are a family of committed employees, driven to make a change and determined to create a better-built environment. We operate with integrity and transparency, we treat each other fairly, we are always accountable for our choices and we take personal responsibility for our actions, always respecting our business partners and caring for our communities.

This Code of Conduct (the “Code”) aims to ensure that our actions and decisions are consistent with our values, setting out standards of behaviour and business conduct expected from all Archirodon employees. It serves as a guide on various issues you may encounter in your day-to-day activities, supporting us all in the decisions we make, empowering us to hold each other accountable and to help us protect our business and the wider interests of our key stakeholders, including our colleagues, customers and shareholders.

ETHOS/OUR VALUES

Ethos is the ancient Greek word for character. A fundamental part of our business involves developing character. This means more than just enabling individuals to be good. It also entails a shared ethos guiding the working activity and behaviour of all employees which eventually defines Archirodon 's identity. Our *ethos* comprises certain core values setting the standards for every aspect of our business operations. These are:

INTEGRITY: Acting with honesty and fairness without compromising the truth. Being able to say no to malpractices, misconduct, corruption and illegal activities. Integrity defines the Group's credibility.

TRANSPARENCY: Being able to justify our actions and decisions, creating clarity and reliability. Transparency enables goal-oriented behaviour throughout the Group.

HSE EXCELLENCE: Adherence to the occupational health, safety and environmental standards with no compromises with a vision of an incident-free work environment.

PASSION FOR OUR WORK: Being proud of what we do, continuously moving forward, striving for improvement and success.

CARE FOR DEVELOPING SUCCESSFUL PEOPLE: Creating a dynamic/challenging working environment whereby all employees can grow their abilities, improve and perform to the highest of expectations. Creating a constant added value to the Group.

SCOPE

- This Code has been developed by Archirodon to help our employees conduct themselves ethically, with the highest level of integrity and in compliance with legal and regulatory requirements. Hence it ensures the Group's commitment to conduct our business globally in the highest standards.
- Each Archirodon employee is expected to carefully read, understand and comply with the present Code, along with our policies, procedures and business practices and commits to abide by the rules and principles specified therein.
- The Group's compliance program establishes a base level of compliance. The present Code does not address each and every situation that may be encountered. Accordingly, it must be regarded as a guide in exercising judgement and common sense on appropriate conduct. You must reference this Code whenever you have a question or concern about compliance related issues and in case of further support needed, you should contact your line manager and/or the designated Compliance Officer.
- We have adopted this Code to ensure honest and ethical business conduct, compliance with applicable laws and regulations in all jurisdictions of conducting business and fairness with customers, suppliers, competitors and employees.
- This Code applies wherever Archirodon (including its affiliates and subsidiaries) maintains business, equally to all its directors, officers, managers and employees, including temporary workers. It is, also, expected that all suppliers, contract employees, agents, consultants and others acting on behalf of

Archirodon abide by the principles of the present Code. It forms a baseline standard so that everyone who is connected with Archirodon knows what is expected.

What is expected by Employees

As an employee you are required to:

1. Understand and follow the laws and regulations that apply to your job.
2. Read, understand and follow the present Code, the underlying policies, procedures and practices applicable to you and take personal responsibility for complying with it at all times when dealing with your colleagues and other stakeholders.
3. Participate in any compliance sessions and/or training organised by Archirodon.
4. If you are uncertain about the ethical implications of a decision or action, it is not only encouraged but expected that you seek guidance from your supervisor or other available resources. Furthermore, document the specifics of your concerns and the advice received for future reference.
5. Report any suspected violations of this Code to your line manager or the Chief Compliance Officer;
6. Cooperate in any investigations for potential misconduct.

As a manager of an employee you are **additionally** required to:

1. Lead by example and promote a culture of compliance and integrity.

2. Help those you supervise to understand and follow the standards set forth in this Code, our policies, procedures and practices so that they could reasonably be expected to behave in a compliant manner at all times and in all instances.
3. Support those who raise a concern or report a suspected problem in good faith, even if they act outside the instructed chain of command.
4. Follow up when you hear about or suspect potential misconduct, promptly escalating the concern.
5. Promote an open communication, by proactively engaging with your team members on ethical matters and encourage open dialogue where employees feel comfortable discussing and addressing ethical concerns.

Archirodon is committed to complying with the laws and business regulations in each of the countries in which we operate. The Code applies everywhere we operate, thus it is important for you to understand that laws, regulations, business practices and customs can vary significantly from one country to the next. In cases of conflict with local laws, rules and regulations you should contact your line manager, the Chief Compliance Officer and the Legal Department for guidance before taking action.

However, while industry practices may vary from country to country or from culture to culture or from jurisdiction to jurisdiction, adherence to the guidelines set out in this Code is expected at all times. We operate under a unified standard of ethical behavior that applies universally. This commitment to a global perspective means that regardless of where our employees operate, they are held to the same high ethical standards that form the foundation of Archirodon's reputation and success.

CONFLICTS OF INTEREST

All employees are expected to act in the best interest of the Group and have a duty to advance the legitimate interests of Archirodon at all times. Therefore you must be cautious to realise whether you participate in activities that create, or even appear to create conflict between themselves individually and the interests of the Group and you must ensure that these conflicts are disclosed and managed appropriately.

A conflict of interest occurs when an employee's personal interests or relationships interfere with their ability to make impartial decisions that are in the best interest of Archirodon. These conflicts can undermine the trust and integrity of our operations and may lead to legal and reputational risks.

Indicatively, conflicts of interest can occur in cases where:

- An employee or someone with whom he/she maintains a close personal relationship (spouses, partners, family members, friends) has a financial interest in an entity that does business with the Group (supplier, subcontractor, consultant etc.) or is a competitor to the Group.

Example: Your sibling owns a construction company that competes directly with Archirodon in bidding for projects. In this scenario, you have a clear conflict of interest. You may be tempted to share insider information about Archirodon's bids, pricing strategies, or project plans with your sibling, giving them an unfair advantage in securing contracts.

- An employee seeks to participate or attempts to influence, any decisions relating to Group's business dealings with companies where their relatives and family members work for.

Example: A project manager with close personal ties to a supplier consistently awards contracts to that supplier without considering competitive bids, potentially resulting in higher project costs.

- An employee seeks/gains personal advantage or opportunity discovered through his/her job position with the Group.
- Outside temporary work or employment with, or for, a competitor of the Group may give rise to a conflict of interest.

In this context, you are anticipated not to:

- have a directorship, substantial shareholding or other interest in a company with which Archirodon does business without prior approval;
- perform any work in your spare time for a third party with which Archirodon does business or which is a competitor to the Group's activities;
- be involved in activities for your own personal gain which conflict with Archirodon's business interests;
- use Archirodon's assets to undertake work for, or provide services to, a third party for your own personal gain; or
- employ or appoint a partner or relative to perform services for Archirodon for reward.

If you find yourself in a position of a potential conflict of interest or you become aware of a such, you must promptly disclose it to your line manager or the Group's Chief Compliance Officer for guidance.

EXPLOITATION

Exploitation comprises repetitive/continuous attempts by an employee to attract clientele within the Group's personnel for the provision of goods or services or facilitation services against personal financial gain or other benefit in an illegitimate manner and is strictly prohibited, given that relevant practices may also endanger the Group's interests and could cause significant harm to the Group's business operation and reputation. Examples:

- Performing administrative services to individuals for the issuance or various licenses and permits needed within the framework of their job against consideration.
- Facilitation of services with an aim to conceal or cover inappropriate behavior or job performance by fellow employees with or without financial consideration.
- Promoting, advertising, selling any kind of goods to other employees in the Group's premises.
- Use of Archirodon's assets to undertake work for, or provide services to, a third party for your own personal gain.

USE OF GROUP'S ASSETS

Group's assets include resources such as office supplies and equipment, vehicles, site equipment and machinery, facilities, financial resources. Employees are expected to use and maintain such assets with care and diligence guarding against wasteful use and fraudulent activities such as:

- Wrongful/negligent use of vehicles, machinery and equipment leading to malfunctions and damages.
- Unauthorized use of Archirodon's vehicles, machinery for other purposes other than those designated by the Group.
- Misappropriation/theft of cash, securities, supplies.
- Falsification of Group's records or financial statements for personal or other reasons.

PROPRIETARY AND CONFIDENTIAL INFORMATION

You may have access from time to time to various types of proprietary information, intellectual property and confidential information (strategic documents, trade secrets, trademarks, copyrights, licensed products sensitive corporate/commercial or business information etc.) which is valuable to Archirodon.

In addition, during the course of business, various third parties (clients, collaborators, partners, subcontractors, suppliers etc.) may also entrust Archirodon information that is proprietary or confidential to their business.

Moreover, due to the EU's legislation, privacy is protected by default and by design. Thus, private data of any nature that could be included in the above-mentioned information may, should be protected and

secured at all times. No disclosure of private data is accepted unless it is conducted in compliance with the Group's policies, procedures and regulations.

Safeguarding such information is an important responsibility and is critical to be treated with utmost care and strict confidence by the employees accessing such information. Any unauthorized disclosure or misuse of such information by an employee either during or after the employment period with the Group could be harmful to the Group, its customers or helpful to its competitors.

PRIVACY AND PERSONAL DATA PROTECTION

Personal information of employees, external collaborators of any kind, contractors, candidates etc, in any form (electronic or physical) are considered highly confidential and should be handled accordingly. We are committed to being transparent about how we collect and use the personal data of employees and others and to meeting our data protection obligations.

Our Data Protection Policy, along with other data privacy related policies, procedures and work instructions which are put in place across the Group, create an enhanced protective framework for the personal data that we collect, maintain and process in a way that follows best practices and recognised standards.

In this context, every employee is expected to:

- comply with all Archirodon Group's policies, procedures and guidelines with respect to personal data protection, as well as, with the applicable laws;
- process personal data in a secure manner, according to Archirodon's policies and procedures;

- ensure that the Group DPO is appropriately and in a timely manner involved in all issues relating to personal data processing (i.e. new projects, contracts, controls);
- report promptly any breaches regarding personal data processing or/and any issue related to personal data protection to the Group DPO at the address: DPO@archirodon.net.

HEALTH & SAFE WORKPLACE

We believe that a healthy and safe workplace is of utmost importance for our people’s wellbeing, thus we maintain an extensive health and safety management framework through which we increase safety awareness and share best practice.

All employees are responsible for the safety of others. Health & Safety (“HS”) is every employee’s responsibility and each one must fully comply with applicable HS laws while understanding and observing the Group’s relevant policies.

In this connection, you are anticipated:

TO:	NOT TO:
<ul style="list-style-type: none"> ➤ Comply at all times with applicable HS rules and procedures, both for your own safety and the safety of others. ➤ Be mindful of the risks and hazards in your workplace and reduce the potential for harm. ➤ Ensure that you and your team’s members are appropriately trained or qualified to perform their 	<ul style="list-style-type: none"> ➤ Undertake tasks for which you are not appropriately trained or qualified. ➤ Work while being under the influence of drugs or alcohol. ➤ Ignore or circumvent HS rules and procedures and/ or take unnecessary risks.

<p>duties safely and always use the correct equipment for the job they are doing.</p> <ul style="list-style-type: none">➤ Promote a positive HS culture.➤ Report immediately any potential risk and/or concerns that may come to your attention through the appropriate channels.	<ul style="list-style-type: none">➤ Put others in danger as a result of your actions.
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EQUAL, INCLUSIVE & RESPECTFUL WORKPLACE

Valuing our employees' contribution to our success, we promote an open culture of recognition and harmonious cooperation in the workplace based on trust and mutual respect. We remain committed to advancing equal treatment for everyone and providing equal employment opportunities, ensuring a workplace that is free from any kind of discrimination. The employees involved in the recruitment, job selection and job promotion decisions within the Group are expected to base the hiring and promotion criteria exclusively on skills, contribution, qualifications and experience, without regard to gender, nationality, race, sexual orientation, national origin or physical ability.

All employees regardless of role or position should cherish a working environment that is free from any kind of harassment and discrimination, thus we have a zero tolerance policy for any violent, abusive, offensive, unfair or other disrespectful, hostile, or intimidating behavior.

Such behaviors are unacceptable practices and are incompatible with the standards of our Group, as well as being in violation of the applicable laws per jurisdiction. We are all expected to conduct ourselves in a

professional, respectful and civil manner in the workplace and to protect our co-workers from any such conduct by immediately reporting it.

YOU WILL:

- Act respectfully and courteously towards our colleagues, customers and suppliers at all times.
- Have consideration and regard for the beliefs and opinions of others, even when they may differ from your own.
- Make fair and objective employment decisions based on merit.
- Report any concerns that you may have about harassment, bullying or discrimination and speak up if you witness any individual being subjected to such a behaviour.

YOU WILL NOT:

- Harass, victimise or bully our colleagues, customers or subcontractors or behave in any way that could be perceived as offensive or unwelcome.
- Discriminate on the grounds of sex, pregnancy or maternity, gender reassignment, sexual orientation, religion or belief, marriage and civil partnership, age, race or disability.

EXAMPLES of behaviors that may indicate bullying, harassment and discrimination:

- Verbal abuse
- Remarks or communications (e-mail, instant messages) which are offensive or inappropriate
- Unwelcome physical contact
- Blocking access to training and promotions, removing responsibilities
- Withholding information
- Sustained criticism

HUMAN RIGHTS

We are committed to respecting and upholding human and labour rights of all those who work with us and for us, ensuring that they are able to work freely and receive fair pay in return, no matter where we operate in the world. We also never turn a blind eye to any practices of human rights infringements on supplier employees and we seek to increase awareness of modern slavery across the Group in order to play our part in eliminating the risk of modern slavery in our supply chain.

YOU WILL:	YOU WILL NOT:	EXAMPLES of behaviors that may indicate modern slavery:
<ul style="list-style-type: none"> ➤ Follow the labour laws of the countries in which we operate and protect the rights of all workers, including migrant workers. ➤ Comply with minimum wage and minimum age requirements and adhere to regulations regarding maximum working hours. ➤ Listen when legitimate concerns are raised, and whenever possible take 	<ul style="list-style-type: none"> ➤ Tolerate any kind of forced, debt-bonded, indentured or trafficked labour. ➤ Exploit anyone or allow anyone to be exploited in Archirodon' name. ➤ Do business with any individual, or entity that does not respect human right. 	<ul style="list-style-type: none"> ➤ Excessively long working hours. ➤ Signs of physical or psychological abuse. ➤ Multiple workers having the same residence address. ➤ Restricted freedom e.g. documents withheld, not allowed to travel alone. ➤ Financial control e.g. wages are withheld, recruitment fees are charged to the employee.

appropriate action to address them.		
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ENVIRONMENTAL SUSTAINABILITY

Taking into account the substantial impact of our operations on global environmental resources, Archirodon is committed to taking proactive steps to protect, maintain and recover a healthy natural environment by implementing environmentally friendly policies and management practices, which incorporate sustainability principles in relevant project-related processes, wherever possible.

These policies and procedures depict the best practices we implement concerning environmental issues and outlines improvements we are making across our organization, while they cover the complete project lifecycle from the sustainable procurement and responsible use of raw materials to the efficient consumption of natural resources and reduction of generated emissions and waste.

YOU WILL:

- Comply with environmental legislation and other regulatory requirements applicable to your work.
- Participate in relevant training programmes.
- Identify environmental risks and opportunities, understand them and act on them accordingly.
- Conserve energy and water at work.

YOU WILL NOT:

- Waste resources;
- Undertake unnecessary business travel;
- Knowingly act complacently towards the environment; and
- Ignore the impacts of our live and future activities and projects on the environment.

- Reduce and recycle your waste and reuse materials where possible.
- Procure sustainable products and raw materials;
- Manage hazardous materials appropriately;
- Read carefully, comprehend and strictly follow the Group's environmental policies and procedures.
- Report any concerns of non-compliance with environmental laws or regulations.

COMPLIANCE WITH LAWS AND REGULATIONS

We comply with the applicable laws and regulations in all countries in which we operate. You must refrain from any behaviour that could involve you, other employees or Archirodon in illegal or unfair practices. In this respect, no performance objective may be defined, accepted or rewarded within the Group if its achievement involves any deviation from these rules.

The provisions set forth below are not intended to cover all legal obligations that may apply but rather to draw attention to a number of risks that require particular vigilance.

Fair competition

In Archirodon, we recognize that competing fairly is vital, because it results in a free and open market, driving innovation and efficiency and therefore, it can contribute to economic growth and improve standards of

living. We maintain a level playing field in our interactions with competitors and do not engage in any business conduct that restrains competition.

We are committed to ensuring compliance with any competition and antitrust laws applicable in the countries in which we operate and prohibit any actions that involve illegal practices of unfair competition.

Violations of competition legislation may lead to significant penalties such as large fines, criminal prosecution, damaged reputation and exclusion from public contracts.

For this purpose, you are expected to consider competition law when dealing with our competitors and ensure that any agreement with joint venture partners does not raise competition concerns, as any agreement with them could have the effect of distorting the market.

YOU WILL:	YOU WILL NOT:
<ul style="list-style-type: none">➤ Keep sensitive commercial information such as prices confidential.➤ Report any suspicions or allegations of possible anti-competitive behaviour.➤ Seek legal advice if in any doubt.	<ul style="list-style-type: none">➤ Discuss pricing or bid strategies with competitors.➤ Enter into discussions with competitors about sharing or restricting accessing particular markets or for particular customers.➤ Take any action just to hurt or retaliate against a competitor.

Anti – corruption and bribery

Considering the significant consequences of corruption and bribery to the sustainable economic, political and social development of several countries as well as their impact to the public trust in business and governments, Archirodon follows a zero-tolerance approach to bribery and corruption across the Group.

Corruption is a form of dishonesty or a criminal offense undertaken by a person or an organization which is entrusted in a position of authority, in order to acquire illicit benefits and can include giving or accepting bribes or inappropriate gifts, double dealing, under-the-table transactions, manipulating decisions, diverting funds, laundering money and defrauding investors.

Bribery is the offering, giving, receiving, or soliciting of any item of value to an official or other person with the intention of inducing or rewarding improper conduct.

The offence does not require that the bribe actually be paid; it only requires that it be offered, promised, or requested.

We do not offer or accept any kind of gifts, hospitality or any other financial advantage or item of value that could improperly influence our or others' business decisions or outcomes.

Furthermore, we do not accept, solicit, agree to receive, promise, offer or give any **facilitation payment**, in order to ensure or to expedite the performance of routine government actions or services.

We are also careful with regard to giving and receiving **gifts/meals and hospitality**. Whereas the acceptance of nominal or customary gifts that are appropriate in nature and value is not prohibited, we refrain from giving or receiving gifts that could be perceived to be inappropriate to and from parties and/or individuals

in the private sector, while we absolutely forbid offering and/or accepting any gifts to and from parties and/or individuals in the public sector such as public officials, judicial officers and politicians.

In any case, gifts must be reasonable, proportionate, and appropriate in the context of the business occasion, offered for legitimate business purposes and not solicited.

YOU WILL:	YOU WILL NOT:	EXAMPLES:
<ul style="list-style-type: none"> ➤ Ensure that any gifts or hospitality, whether given or received, could not be regarded as unacceptable or inappropriate. ➤ Disclose any gifts or any other form of gratuity received whose collective value is equal to or greater than \$100. ➤ Obtain approval from competent line managers for gifts or any other form of gratuity whose collective value is equal to or greater than \$100. ➤ Always seek advice from your line manager to receive the necessary approval, when in doubt. 	<ul style="list-style-type: none"> ➤ Give or receive anything that could be considered inappropriate. ➤ Make charitable donations without appropriate approval. ➤ Make political donations. ➤ Make facilitation payments, however small, to speed up services to which we are entitled. 	<ul style="list-style-type: none"> ➤ Hire an official's relative in exchange for a contract award. ➤ Pay an official to expedite the release of funds for an invoice payment. ➤ Pay a commission to an official for extending a tender's submission period. ➤ A supplier is offering you family vacations on his private yacht following the award of a contract. ➤ Offer a valuable gift to a public official to issue a

<ul style="list-style-type: none"> ➤ Report any concerns that you may have about bribery or corruption. 		<p>Visa within a short period of time.</p> <ul style="list-style-type: none"> ➤ Receiving a lavish gift or hospitality from a business partner who is competing for a contract you will award. ➤ Receiving repeated gifts and hospitality (even as per the customary practice) from the same business partner.
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Sanctions, trade and exports control

We trade lawfully and properly at all times complying with economic sanctions’ laws, regulations, embargoes or restrictive measures (“*Sanctions*”) applicable to our business activities and we identify and manage associated risks appropriately. We are committed to comply with all Sanctions to which we are subject and to adhere to best business practices.

Sanctions may take various forms in nature or extent, including:

- Broad prohibitions on dealings with or within certain countries, individuals or corporate entities (“*Sanctions Targets*”)

- Trade restrictions, including arms embargoes, prohibitions on export and/or import of certain goods, on the provision of certain services, technology or making investments, flight and visa/travel bans
- Financial sanctions, such as asset freezes and prohibitions on financial transactions

Due to the global nature of our business and because sanctions apply across borders, the transactions we engage in may be subject to Sanctions imposed by multiple government authorities and international bodies (such as the United Nations). Violations of Sanctions can lead to substantial criminal and civil penalties, for both Archirodon's business and individual directors, officers and employee(s), as well as significant reputational damage.

Archirodon's maintains effective measures to ensure compliance with and awareness of its Sanctions-related obligations, including a sanctions screening procedure, as provided in the Group's Sanctions Compliance Policy.

Financial Management and reporting/Anti fraud

Financial integrity builds trust with customers, business partners and shareholders. Proper and accurate business and financial records and strong financial controls play a vital role for our long-term success and constitute a major part of behaving ethically, ensuring that we remain trusted and that we do the right thing.

We are committed to the prevention and detection of fraud and dishonesty. Fraud means obtaining an advantage (financial or otherwise) or causing someone a loss through the use of deliberate deception. Making a false claim is fraud; using or diverting the Group's money or resources for improper purposes is

also fraud. Fraud allegations will be taken seriously and rigorously investigated, with substantiated allegations treated as gross misconduct. Activities that may be a criminal offence, will be reported to the relevant party.

WE ALWAYS:

- Act honestly and transparently.
- Keep clear, true, complete and accurate records of all financial transactions and record them in a timely manner in our financial records.

WE NEVER:

- Deliberately make a false or inaccurate entry in any company records or books of account.
- Allow anyone else to act fraudulently on our behalf.
- Ignore anything that we suspect could involve or give the appearance of fraud or deception.

Anti-Money Laundering

Money laundering is the illegal process of making money generated by criminal activity, such as drug trafficking or terrorist funding, appear to have come from a legitimate source. The money from the criminal activity is considered dirty, and the process “launders” it to make it look clean, through otherwise lawful business transactions as a way to hide the source of money that has been obtained illegally. Money laundering typically involves payments in the form of cash or money order.

At Archirodon, we are committed to complying with applicable anti-money laundering and counter terrorist financing laws and regulations. We do not condone, facilitate, or support money laundering or terrorist financing.

Each employee must watch out for irregularities in the way payments are made; suspicious activity includes large cash transactions as well as customers who are reluctant to provide verifiable information. If you have concerns about a payment, request an alternative form be used and report the concern to your line manager or the Group’s Chief Compliance Officer or file a report via the established whistleblowing channel.

TRANSPARENT COMMUNICATION/ PROTECTION OF OUR REPUTATION

At Archirodon, we consider the quality of the information we share of utmost importance and we strive to provide transparent and reliable information, notably to all stakeholders. To this end, we require all employees, irrespective of position or level, to take the greatest care in ensuring the quality and accuracy of the information they transmit within or outside the Group.

You must use the internet, social media and email with due care and professionalism, always being clear and factual in your communications, whilst maintaining the highest standards of confidentiality and data privacy, as the online space counts as public space. Any reference to your affiliation with the Group must be made only in the context of providing information about your professional capacity and should not extend to the disclosure of any confidential or otherwise sensitive information. You must also be mindful and ensure that your personal and business communications are clearly separated and safeguard that any enquiries from the media and the public are handled through the appropriate channels.

YOU WILL:	YOU WILL NOT:
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| <ul style="list-style-type: none">➤ Make clear that views expressed on social media are your own and not those of the Group➤ Uphold the Group's values in all of your communications➤ Review your communications before you post or mail them➤ Remember that the internet is not private➤ Refer queries from the media and the public to the competent Group Communications' Department➤ Always be careful and seek appropriate advice regarding any communications that contain sensitive information, require you to express opinions outside your field of expertise or relate to legal issues. | <ul style="list-style-type: none">➤ Use business email for non-business activities➤ Discuss competitors, colleagues or customers in a negative way➤ Speak on behalf of the Group unless you have the authority and the necessary expertise to do so➤ Post or email when you are upset or annoyed |
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DOING THE RIGHT THING

It is of utmost importance to understand that most of the problems in business conduct can be avoided by exercising common sense.

In some occasions you might be unsure about what is the right thing to do in a business situation. If you are confronted with such situation, do not take the action.

INSTEAD step back from the situation and consider these questions:

- Is it legal? Should I consult with the Legal Department, or my supervisor?
- Is in in line with Archirodon' s core values?
- Does it comply with our policies, procedures and practices?
- Does it protect the privacy at all times?
- Am I involving the right people?
- What would my family, friends, manager or colleagues think?
- Would it be fair and honest to everyone involved?
- Would I feel comfortable if I read about my actions in a newspaper, or had to explain them to a judge?
- How will I feel about myself afterwards?
- Will my actions stand the test of time?

If you hesitate or if your answer to the above is “no” to any of these questions do not take the action. If you are still in doubt seek guidance by discussing to your supervisor or by addressing the matter to the other officers having relevant authority in your area or by directly consulting the Legal Department.

Always take personal responsibility for doing the right thing!

IMPLEMENTATION/REPORTING/WHISTLEBLOWING POLICY

The Group's organs in charge for the implementation, monitoring and handling all issues related to compliance are the Chief Compliance Officer and the Compliance Committee as described in the Business Conduct and Ethics Compliance Policy of the Group.

If you think there may have been a breach of this Code, or if you need advice on handling a difficult situation, it's important to speak up about it. Speaking up could safeguard yours and the Group's interests and protect from serious legal consequences and avoid harm to the Group's reputation. There are different ways you can raise a concern or get advice and assistance and you can choose whichever route you feel comfortable with, or suits the situation best.

Your reports and/or concerns may be addressed to:

- Your line manager;
- the Group's internal whistleblowing channel: <https://www.archirodon.net/about-us/ethics-compliance/>, as per the Group's Whistleblowing Policy.

Archirodon will promptly investigate and take appropriate action. To this end, we have put in place the Group's Whistleblowing Policy which provides a framework for the timely detection of irregularities, omissions or even criminal acts occurring during the operations of the Group, including any breach of the present Code. This Policy sets out the principles, protection measures and the general operational

framework under which the Group receives, manages, and investigates relevant reports which relate to the Group and are brought to the attention of its staff or third parties.

Any report received will be treated in the strictest confidence and no personal details of the person making the report will be made public. Any incidents of retaliation, being any adverse action against an employee because he/she filed a complaint, reported a misconduct, or participated in an investigation are expected to be treated as serious breach of the Whistleblowing Policy and any person found to have retaliated against someone, may be subject to discipline, up to and including immediate termination.

CONCLUSION

We are all responsible for making sound and fair decisions that comply with both the letter and spirit for the laws that govern our actions. We must work together to create a healthy and respectful working environment and continue to contribute our positive elements into our work in which we can be proud of.

As you go about your daily activities, please remember to:

- Abide by the principles of this Code
- Use common sense in your work and decisions
- Refer to available resources for guidance when you have questions
- Hold colleagues and partners to high ethical standards
- Do not sacrifice your personal integrity for profits or personal benefit
- Report suspected illegal actions and compliance violations promptly
- Encourage employees to seek guidance when in doubt

Archirodon will update this Code and the so as to reflect relevant changes in the law and/or changes to our policies.

This Code does not provide any rights, contractual or otherwise, to any third parties or to any personnel of Archirodon.