

## **CODE OF ETHICS**

### **1. ETHICAL BEHAVIOR**

1.1 All employees should conduct themselves in a proper, courteous and ethical behavior and conforms to all company rules and regulations. Employees should also promote harmonious working relations and a conducive environment at work, consistent with the core values of the company.

1.2 In discharging their job duties and responsibilities, all employees should exercise due care and diligence in their work at all times.

1.3 During employment, employees shall not at any time without prior approval of ARA, engage in any business for reward or gratuitously, other than in respect of their duties to the company.

1.4 The company prohibits all employees to ask or obtain benefits in any form from third parties having existing or future business transactions with the company. Employees should refuse any gifts of high value immediately. However, employees are allowed to keep ordinary and customary corporate or festive season gifts below S\$50 and declare gifts above S\$50 to the Business Unit CEO and above S\$500 to the Group Chief Executive Officer for their decisions on how the gifts should be dealt with.

1.5 All company properties in the office premise must be taken care of by the employees and any damages shall be reported to the Corporate Administration Department. No company properties are allowed to be taken out of the office premise without prior approval by the Corporate Administration Department.

1.6 Employees must not bring the ARA Group into disrepute or engage in any unlawful act or dishonesty and not abuse the trust placed in them by the company.

1.7 Before commencement of employment, staff must declare all existing directorships and key officer appointments held in other organizations, including political bodies. Approval must be obtained from the Group Chief Executive Officer to retain these directorships and appointments.

1.8 Any form of misconduct is not tolerated in ARA and the employee shall be subjected to disciplinary actions including termination and dismissal. Examples of such misconduct are bribery, possession of drugs, consuming excessive alcohol, willful insubordination or behavior, absence without leave, negligence, fighting, thefts and committing unlawful or criminal actions.

## **2. SWEAT FREE CODE OF CONDUCT**

2.1 The company prohibits the employment of anyone below the age of 13 years in any form of labour. The company also does not tolerate any forced labor of any kind, including slave labor, prison labor, indentured labor, or bonded labor, including forced overtime hours.

2.2 The company agrees to cooperate fully in providing reasonable access to its records, documents, agents, employees or premises if reasonably required by Government officials.

## **3. DRUG-FREE WORKPLACE**

3.1 The Company has a drug-free policy that does not tolerate any unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance in the organization's workplace. Employees who violate this prohibition will be reported to the local authorities and will be subjected to immediate dismissal.

3.2 For preventive education, aftercare services and post aftercare services, the Company takes guidance from the Singapore Anti-Narcotics Association and Narcotics Division for a list of services provided. More information can be found at [www.sana.org.sg/ourservices.shtml](http://www.sana.org.sg/ourservices.shtml) for Singapore and <http://www.nd.gov.hk/en/treatment.htm> for Hong Kong.

## **4. COMMITMENT TO A SUSTAINABLE ENVIRONMENT**

4.1 The Company recognizes its responsibility to conduct business in a way that protects and improves the state of the environment for future generations. As a global firm, we understand that the long-term well-being of society, the wellbeing of our employees, the strength of the global economy, and the continuing success of our own business depend on our commitment to a sustainable environment.

4.2 The Company is committed in operating in a manner that promotes energy and materials conservation, waste reduction and recycling products.