

Code of Conduct



Tim Arnholdt
Managing Partner



Sophie Keim
Sales & Development Director



Alien Wolter
Managing Partner



Steffen Rothmeier
Managing Director

Introduction

What we stand for

The ARNO Code of Conduct is intended to support us in acting properly and reasonably in our daily work as well as with strategic considerations and related legal or ethical decision-making processes.

The company is committed to upholding the ARNO Code of Conduct. It is based on company principles, visions, UN conventions, applicable laws and relevant standards - principles that we as a company uphold without exception. Our requirement is that all business is carried out legally and ethically. Employees are obliged to strictly uphold the ARNO Code of Conduct and actively implement regulations to an exemplary standard. If dictated by regional circumstances, local standards shall supplement the Code of Conduct.

Managing Directors Alien Wolter, Tim Arnholdt, Steffen Rothmeier and Design Management Director Sophie Keim are responsible for implementing the ARNO Code of Conduct. They are supported by managers at all subsidiaries. All managers at executive level are obliged to sign a declaration of compliance that will be kept in their HR file.

Laws and societal norms

We comply with them

ARNO is represented in many product markets across the globe, and therefore subject to a range of different laws. We are obliged to uphold all applicable laws locally and supraregionally, as well as national customs and other societal norms.

No to corruption

We do not tolerate corruption

Corruption damages both competition and society, and can have consequences under penal law and civil law. We and our employees condemn corruption both nationally and internationally, including the acceptance of benefits in relation to professional activities. The only exception is hospitality at business meals or business events. In order to avoid the appearance of any bribery or corruptibility, we are guided by the tax value limit of 35 Euro for small gifts on certain occasions. We strictly condemn fraud and disloyalty.



No to discrimination

We do not tolerate discrimination

We are a global company, active in many different countries with different cultures. We believe that people with different ethnicities, world views, religions, genders, ages, disabilities or sexual orientations make our company richer. No business partner or employee should be discriminated against due to any of these characteristics.



Respect

We respect each other

Our company's success depends as much on the appreciation of our employees' skills and work as on our dealings with customers, service providers and suppliers. Employees can expect to be treated equally and with respect. We strive for free and open communication, effective teamwork and the continual development of our staff. Our aim is to create an environment of openness and mutual appreciation.





Health and Safety standards

We comply with them

Protecting people and the environment is fundamental to us. We consider it our obligation to carry out our business sustainably, to create safe and healthy working conditions, and to continually improve occupational health & safety and the environment. Our aim is to avoid all risks by implementing established preventative measures.



No conflicts of interest

We avoid conflicts of interest

Business relationships with other companies in which friends or relatives are directly or indirectly involved are not necessarily prohibited, however, must be comparable to relationships with third parties and be subject to conditions standard for the market. Favouritism due to personal grounds must not occur. That's why we expect our employees and partners to strictly separate personal interests from ARNO's interests.





Protection

We protect assets and competition-relevant information

Our employees are responsible for protecting material and immaterial assets within their areas of activity. Material assets include objects such as land, buildings, vehicles, products, hardware, materials and any form of documents. Immaterial assets include know-how, technology, business secrets and other information valuable to ARNO which needs to be protected. Electronic information systems must be used within legal realms and necessary security measures must be implemented.

No to money laundering

We reject money laundering

We only maintain business relationships with partners whose business complies with applicable laws and whose capital has been gained legally.

Fairness

We are fair

We condemn any unlawful practices that distort, limit or prevent competition. We strive towards fair competition without limitation. We uphold laws against the restriction of competition in all countries in which we are active, without exception.

Violation of the Code of Conduct

We are thankful for your help

We believe that ethical behaviour and compliance with the law are fundamental to our credibility and business success. Our corporate culture is characterised by a sense of responsibility and mutual respect. Our primary goal is to avoid risks that could harm our company, our employees and our business partners. We have implemented a Whistleblower Software [↗](#) to ensure that reports of misconduct are handled appropriately and fairly.

We encourage all individuals inside and outside the ARNO Group who observe or become aware of violations to report them openly and without fear. Misconduct may include, for instance, corruption or money laundering, human rights or environmental violations, and non-compliance with technical specifications or standards. We provide full protection for whistleblowers.

Detailed information on whistleblower protection can be read in our Guideline Anti-corruption [↗](#) on page 4.

Creating Instore Success. Together.