



NTT

Code of Conduct

Cloud Communications

Introduction

Cloud Communications is a division of NTT Ltd., a global technology services company. Focused on delivering smart communication to enable smarter workspaces, our mission is to provide world-class cloud communication solutions that enable dynamic collaboration interactions for improved workforce efficiency, productivity and engagement. We specialize in unified communications, cloud voice and digital events, delivering tailored end-to-end consulting, value realization services and change management to empower businesses and enable their digital workplace transformation.

Our success not only relies on our expertise, but also on our corporate values, which reflect our integrity and transparency in business, as well as the well-being of our employees.

Code of conduct (hereafter the “Code of Conduct”) describes our commitments and expectations in relation with our employees, partners and clients. It expresses our human and business ethics, as well as our compliance with international, national laws and regulations applicable to the Cloud Communications division of NTT Ltd. It encompasses the values that influence the way we work, drive our business and develop the relationships with our clients:

Speed: We are agile in our actions

Execute: We execute with excellence

Together: We are best when we work together

We put trust at the very heart of our business relationships. We want to work with partners who share our commitments and have the same business vision as ours. Furthermore, our company sustains the well-being of all our employees. Considering ourselves as a human company above all, we ensure that they enjoy their work, act according to our values, and apply our commitments.

As a worldwide Service Provider, we deal with many situations depending on the business practices and local laws. This Code which cannot foresee all situations, describes therefore our general guidelines. We rely on our employees to use their judgement and to act with discernment when facing a situation.

A similar Code of Conduct is presented to our employees. Any entity or contractor entering in a business relationship with us shall respect the same principles.

Human

Labour law

We consider human capital as a key success factor and follow the idea that a happy employee works better and makes a happy customer. As a responsible employer, we are committed to ensure the well-being of our employees and their professional development by giving them a decent, safe and appropriate work environment.

We ensure our compliance with national and international labour laws and conventions applicable to the Cloud Communications division of NTT Ltd. Work shall be freely accepted and employees shall be free to leave in accordance with established rules.

Diversity and equal opportunities

Diversity and equal opportunities are highly valued at NTT Ltd. We recognize and respect cultural differences. The diversity of our staff is one of our strengths and makes us a stronger organization. We are firmly committed to maintaining a healthy and safe work environment without any discrimination. Our French office signed an agreement with employee representatives in order to educate and inform on disability in order to fight against exclusion, as well as to recruit disabled employees and give everyone the same professional opportunities.

The fight against discrimination extends to all employees in all situations from recruitment to dismissal, and all decisions are taken only with reference to skills and results. Discrimination based on racial origin, gender, age, religious belief, membership in a trade union, handicap, sexual preference or any other reasons are unacceptable.

Harassment

We reject every form of abuse, harassment or intimidation, and for whatever motive. Employees shall not receive mental or physical punishments. The managers are responsible for keeping a healthy work environment.

Furthermore, any form of sexually offending behaviour, inappropriate comments or actions that can legitimately be considered as offensive or discriminatory must be reported. Every offender shall be subject to a disciplinary sanction as well as any sanction provided by the applicable labour law, up to dismissal if necessary.

Child labour

We do not tolerate child labour and are concerned by the well-being of children.

The childhood period is a time in which the human is fragile and the child needs a special protection. In this regard we follow national labour laws and the United Nations Convention on the Rights of the Child (1989) and expect from our partners the same. If any form of child labour is discovered we will ask our suppliers and their subcontractors to take steps to stop these situations.

If a corrective action plan is not set up immediately, we will end all commercial relations and contracts in progress.



Business

Anti-bribery and competition

We comply with the trade laws of every country where we operate, and are aware that anticompetitive practices like bribery and buying of favours are common in certain countries. The sales team must act carefully by dealing in such countries. Each salesperson commits that every business transaction is handled with loyalty and transparency.

We also comply with anti-bribery and corruption laws and regulations. We ensure that our employees, partners and clients share the same commitment. Bribes like kickback or facilitation payment are not tolerated and must be immediately reported to the manager. Extreme caution is needed with gifts or other benefits, such as events without direct business relevance. In order to prevent a bribery situation, our employees and officers shall act with discernment, and always report to the Compliance department in case of any doubt.

Selection of partners

With this Code of Conduct, we intend to maintain trustful and transparent relationships with our business partners. We also ensure that they apply the same work ethics. Suppliers are selected on the same commitments described in this Code of Conduct.

We will clearly communicate these expectations before taking any contractual engagement. Any indications that a business partner does not comply with applicable laws or this Code of Conduct must be reported in order to evaluate the sustainability of the relationship.

Intellectual property

Our know-how and intellectual property are the core of our expertise and contribute to our competitive position in the collaborative services business area. The whole company workforce has to ensure a secured access to such elements. We are likewise committed to not use third party's intellectual property without proper authorization. We ensure that any element of intellectual property is used with prior authorization of its owner.



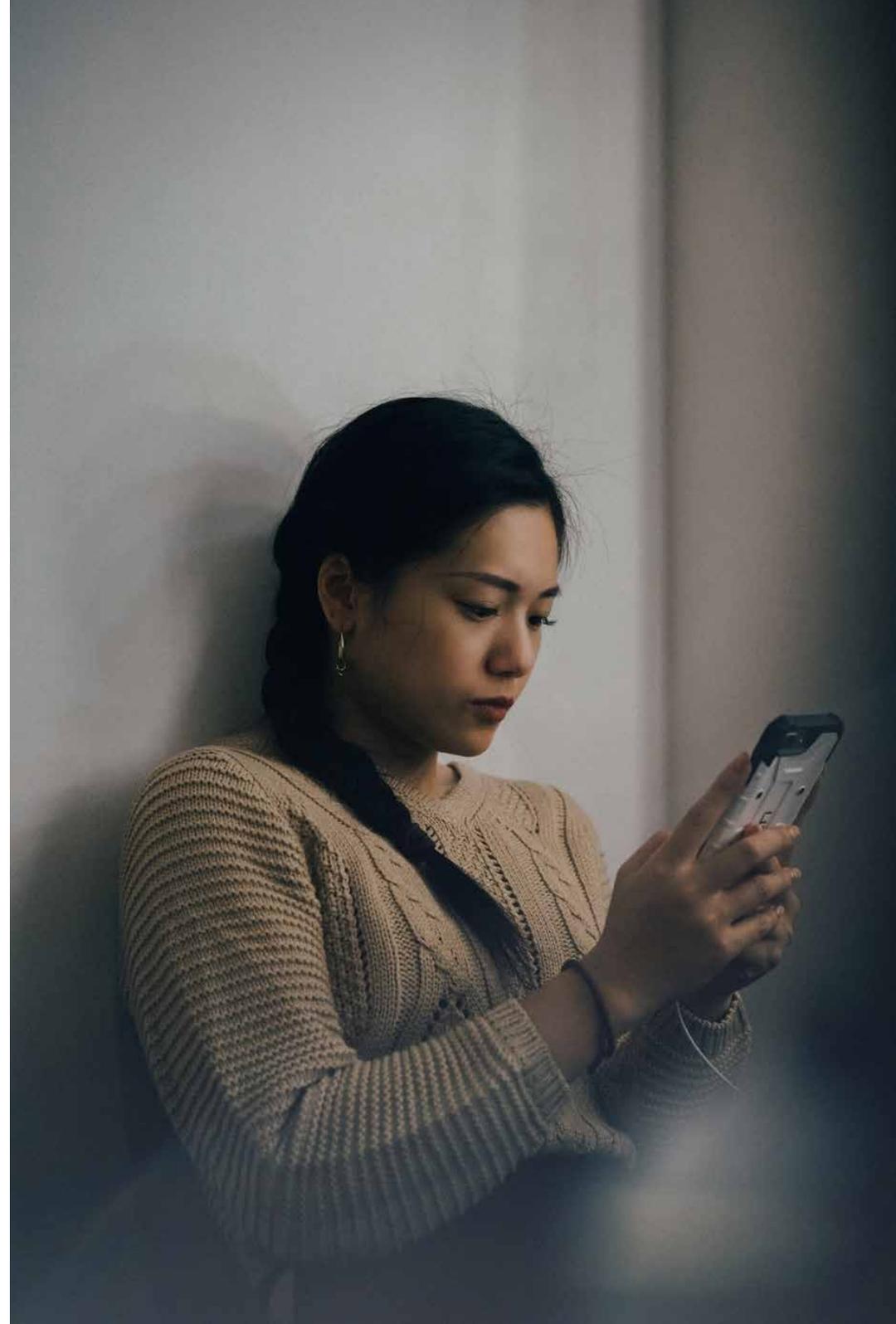
Security

Confidentiality & data protection

We hold all information relating to business affairs, clients and suppliers, in confidence and safety. Such information is important for us and for our development. In addition, all the means available must be deployed to ensure confidentiality. No information should be disclosed to third parties except if required by employee's job duties or specifically allowed by the disclosing party.

Employees shall not use confidential information, neither for personal benefit, nor for any other purpose than the one for which they have been given access to such confidential information. All employees shall report the loss or theft of confidential information.

We are strongly committed to protect personal data. Privacy and data protection are fundamental freedoms for our clients and an undeniable trust factor for us. We collect, store and process personal data for business purposes and legal reasons. We undertake to process these personal information in accordance with applicable data protection laws and regulations including the EU General Data Protection Regulation (GDPR).



Society

Environment

Environment is subject to particular attention. By providing collaborative services, we contribute to reduce clients and companies environmental impact. We respect all environmental laws, rules and regulations by efficient use of energy and natural resources.

We minimize our impact on nature and promote sustainable development.

In order to achieve this, all employees are encouraged to become aware of the ecology principles and to act responsibly in their day to day work. This applies particularly to printing, using paper, optimizing the temperature of our offices, and travelling.

The hardware and the office installation are set up to reduce the environmental impact.

Legal compliance

We are subject to different local, national and international laws and regulations. All acts, measures and contracts applicable to our operations and business activities must respect the principle of legal compliance.

All employees are responsible for the observance of the legislation in their working environment. When in doubt, they must consult the legal department. Each employee must comply with the applicable legislation.

Conflict of interest & politics

Every employee can engage in a political or union activity in addition to his/her work. Such activities are strictly personal and do not involve us in any way. Moreover, some activities are not appropriate when working at the Cloud Communications division of NTT Ltd, due to a potential conflict with our interests. The employees shall neither be in position of committing an insider trading, nor irregularly increasing our competitive position. In case of any doubt, they must report to their manager.

The same precaution is required for employees whose personal environment is involved in such activities that create a conflict of interest with our business activity.

Image and communication

Corporate reputation is important for us and our financial health. All employees should be an example in all circumstances, everywhere and in all social situations.

These principles must also apply to the use of new interactive communication tools, mainly the social networks like Facebook, Twitter or YouTube. They are to be used responsibly, in areas of both private and public life, in a way fully compatible with our values.

We do not tolerate the use of aggressive or insulting language and hateful words. Except if within the scope of employee's functions, only the marketing department is authorized to communicate directly with the customers, media, public and regulators.



Compliance with the Code of Conduct

In everyday work life, our employees, representatives and/or partners shall respect this Code of Conduct. The compliance with this Code of Conduct is a matter of cardinal importance for us, our shareholders and clients. All offences against Code of Conduct rules by our employees or partners should result in a sanction including disciplinary measure and/or administrative penalty.

Our employees, representatives and business partners may contact the Compliance department for any question about this Code of Conduct at the following e-mail:

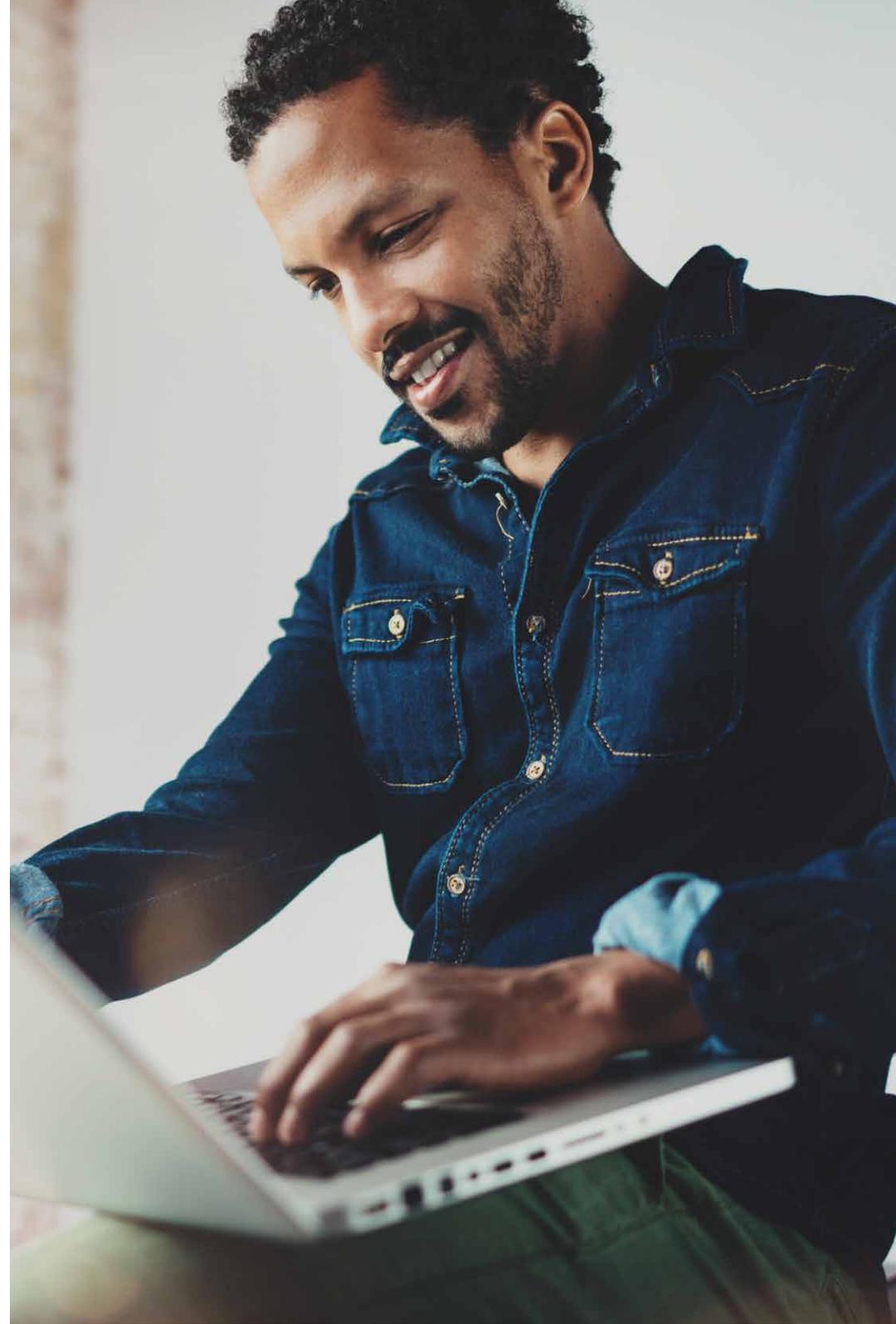
compliance@arkadin.com

The whistle blowing contact point:

If an employee, external or occasional co-worker becomes aware of any misconduct or any illegal act, such as a violation of law, or any other act contrary to the Code of Conduct or any suspicion thereof, this employee, external or occasional co-worker shall promptly report this fact to his/her manager. If this person is unable to report the fact to his/her manager, a report system for the collection of alerts has been implemented and, in order to ensure the maximum level of confidentiality, an e-mail address has been established to contact the Compliance department:

compliance@arkadin.com

The Compliance department will provide an independent and impartial investigation for each reported issue. An employee who has reported a case to the Compliance department will never receive unfavourable treatment because of such report. We will take measures where necessary to prevent the reporting employee from being treated unfavourably.



Appendix

Our ethics standards charter

We are committed to making our business grow through shared values and common principles. For this purpose we clearly abide by our ethical standards.

We are accountable to:

- Our clients, supplying quality services in strict compliance with security and privacy standards
- Our employees, paying attention to their professional development and promoting health and safety in the workplace
- Our suppliers and partners, drafting clear contract terms and conditions, and ethics commitments
- Civil society, complying with local, national and international laws and regulations, protecting the environment and respecting local cultures

We expect our employees:

- To make a positive contribution to our ethics standards in the course of their daily routine
- To strictly abide all applicable laws and regulations
- To build clear and honest relationships with clients, suppliers and partners
- To ensure the confidentiality of processed business information
- To contribute to a positive working team environment

More generally we undertake:

- To respect the principles of free competition and anti-bribery regulations
- To abide by the commitment for human rights standards
- To be actively involved in environmental stewardship
- To remain apart from the political processes which may conflict with our business activities



