

Group Code of Business Conduct



Arena

Message from the Group CEO



I'm pleased to share with you the Arena Group Code of Conduct – a guiding document that reflects who we are, how we work, and the values that unite us across our global business.

At Arena Group, we operate with integrity, respect, and professionalism, working together with a spirit of collaboration that transcends borders and time zones. These principles are not just ideals – they are the foundation of how we engage with each other, our clients, our vendors, and our partners. Our Code of Conduct is here to help every team member understand the expectations that come with being part of the Arena team.

This Code is not meant to be a rulebook for every situation. Instead, it serves as a framework to guide your decisions and actions. We trust and encourage everyone to use sound judgment and common sense when assessing circumstances that may arise in your day-to-day work.

With a presence across multiple continents, Arena Group is proudly rich in culture, background, and experience. This diversity is our strength – and our Code of Conduct is a unified force to align and harmonize how we operate as one global team.

It is a shared commitment to uphold our standards, support one another, and continue building a positive and inclusive work environment.

Let this Code bring us all together, reinforcing the trust and collaboration that power our success.

Thank you for embracing it and for living our values in everything you do.

Paul Berger

Group Chief Executive Officer



Breathing life into space.

Arena brings projects to life by designing and building spaces that make a lasting impression. We have the expertise, creativity and commitment to transform empty spaces into vibrant places.



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Table of Definitions and Abbreviations

The following table lists common terminology and their definitions used in the Policy:

| Terms | Definitions |
|-----------------------------------|---|
| Applicable Laws | All local, national and international law, statute, ordinance, regulation, order or resolution issued by competent governments and other regulatory authorities, as they apply to the jurisdiction in which the business of Arena Group is operating. |
| Arena Group | Together Arena Events Group Limited and its Subsidiaries. |
| Business Partners | Includes any party with which Arena Group conducts business, remits funds to, or receives funds from, including (but not limited to) suppliers, vendors, service providers, consultants, advisors, contractors, distributors, agents, commercial intermediaries, other intermediaries, investors, partners, and mergers and acquisitions targets. |
| Bribery / Bribe | Any offer, gift, payment, promise to pay, or authorisation for anything of value provided, directly or indirectly, to or for the use or benefit of any person for the purpose of influencing any act, failure to act, decision, or omission in order to improperly obtain, retain, or direct business to or to secure any improper benefit or advantage for Arena Group. |
| Code | This Code of Business Conduct. |
| Compliance Related Matters | Any applicable obligations, requirements and activities with respect to: <ul style="list-style-type: none"> • Compliance with Applicable Laws • Compliance with applicable internal compliance activities, policies and procedures within the mandate of the Group Legal Department (including, however not be limited to, the Code, anti-money laundering, anti-bribery and anti-corruption, Conflicts of Interests, data privacy, confidentiality, whistleblowing, competition law, insider trading, Third Party due diligence, related party transactions and Compliance policies. Adherence to ethical business practices and behaviour; and assurance of integrity in all interactions and arrangements with persons and entities within and outside of Arena Group. |
| Conflicts of Interest | Any situation in which a person, or a Family Member, has a personal or outside interest that is sufficient to appear to influence the objective exercise of judgement in official duties for Arena Group, regardless of whether it would actually influence that exercise of judgement. |
| Committee | Any Employees, regardless of the name of the Company, appointed to carry out specific activities and departments on an ongoing basis including but not limited to Management and Operational Committees. |

| Terms | Definitions |
|-----------------------------|--|
| Company | Any one of Arena Events Group Limited or its Subsidiaries, as applicable. |
| Corruption | An act done with an intent to give some improper advantage inconsistent with official duty and the rights of others; misuse of a station or office to procure some benefit either personally or for someone else contrary to duty and to the rights of others |
| Division | A business unit of the Company, which falls under the leadership of a Regional CEO who reports directly to the Arena Group CEO and/or Deputy Arena Group CEO, and which may have subordinate departments. |
| Employee | Arena Group's full-time and part-time employees as well as any other person that has been issued an employee ID number by Arena Group (including but not limited to Management, permanent employees, outsourced agents, temporary agency staff, representatives, contracted staff, interns, trainees or equivalent employed by Arena Group). |
| Facilitation Payment | A form of Bribery made for expediting or facilitating the performance of a Public Official in a routine governmental action. For example, payments made for expediting processing papers, permits and other actions conducted by an official |
| Family Member | A spouse, child, stepchild, grandchild, parent, stepparent, grandparent, sibling, mother- or father-in-law, son- or daughter-in-law or brother- or sister-in-law (including adoptive or custodial relationships) whether or not sharing the same household. Please note: The term "Family Member" as applied in this Policy has wider scope than the definition "Relative" as applied in the Group Insider Trading Policy (insert reference). The reader is advised to apply the appropriate term as per the context of the Policy / Policies in the context to which they are being referred. |
| Framework | Set of guiding principles, rules, and guidelines that establish the overarching structure and direction for decision-making, actions, and practices within a particular domain or context. |
| Government | Any government within a jurisdiction within which Arena Group has a registered corporate presence or operations. |
| Governing Instrument | The Instrument upon which another Instrument is dependent. The subordinate Instrument must ensure the implementation of the Governing Instrument. |

| Terms | Definitions |
|----------------------------------|---|
| Gift | Anything of value, other than Entertainment, including but not limited to, payments (in cash, vouchers, gift cards, bank transfers, rebates or discounts not available to the general public, or other forms), per diems, jewelry, food or beverage (not taken with others as part of an event, e.g., packaged chocolates), flowers, loans, animals, travel (other than Sponsored Travel), employment, and any other type of advantage or thing of value. |
| Group Compliance Champion | The Employee designated by Arena Group within a region and/or country of operation to oversee and coordinate compliance activities with the Chief Compliance Officer, including but not limited to promoting and raising awareness of compliance policies, coordinating with the implementation of new policies, coordinating compliance training and serving as the primary point of contact for compliance-related matters within relevant region and/or country of operation. |
| Instrument | An instrument is a binding document which can be used to impose mandatory obligations or delegate authorities. |
| Line Manager | The person to whom the Employee reports for the purposes of work direction and attendance and performance management. |
| Management | The Employees of the Arena Group who are members of its core management team (holding titles like senior manager, chief executive officer, chief financial officer, and other chief executive roles). |
| Money Laundering | The process criminals use to legitimise proceeds obtained from illegal activity. money is “laundered” by passing it through legitimate businesses, and the nature of the financial transaction and the source, origin, and/or owner of the funds is concealed. |
| Public Official | Includes any of the following: <ul style="list-style-type: none"> • Official, employee, or person acting for or on behalf of any Government Entity or Public International Organisation • Political party official or candidate for political office • Person who holds a legislative, administrative, or judicial position of any kind, whether elected or appointed, in a country or territory (or subdivision of a country or territory) or Public International Organisation Person who otherwise exercises a public function for or on behalf of a country or territory (or subdivision of a country or territory) or for any public agency or public enterprise of a country or territory (or subdivision of a country or territory) or Public International Organisation. |
| Process | A series of tasks to be undertaken to carry out operational task, eventually achieve the intended results or outputs, and contribute to the successful operation of the Company. The process also identifies specific responsibilities and supporting documents necessary for its full implementation and maintenance. |

| Terms | Definitions |
|-----------------------------|--|
| Process Owner | The division/department with responsibility for the policies, activities, departments, and Processes which are the subject to the Instrument. Where more than one division/department share responsibility for the policies, activities, departments, and Processes, the one with primary responsibility is the Process Owner and the others are stakeholders. |
| Sanctions | Any economic, trade or financial sanctions laws, regulations, embargoes or restrictive measures administered, enacted or enforced by a Sanction Authority. |
| Sanctions Authority | The UAE EOCN, United Nations, the European Union, the Organisation for Security and Cooperation in Europe, OFAC, His Majesty’s Treasury, the UAE and any other governmental institutions or agencies which implement Sanctions. |
| Stakeholders | Together the Employees and the Business Partners. |
| Subsidiary | A company that is controlled, either directly or indirectly, by another company known as the holding company or parent company. |
| Supporting Documents | Any non-binding documents which support the implementation of Instruments. They cannot be used to impose binding, mandatory obligations. |
| Terrorist Financing | Financial support of terrorists or those who encourage, plan, or engage in terrorism-related activities |
| Third Party | Includes any Arena Group customers, partners, or any other stakeholders. |
| Whistleblowing | Has the meaning given to this term in Arena Group’s Whistleblowing Policy Manual. |
| You(r) | The reader of this Code, being at the same time subject to its requirements due to working for, with or representing Arena Group. |

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A. Introduction

1. Title

This instrument is titled the Code of Business Conduct (this “Code”).

2. Purpose

- This Code represents the standards of business conduct and expectations related to all Employees and any Third Parties dealing directly with Arena Group. The Code provides guidance on the application of Arena Group’s values and provides a foundation for all Arena Group’s policies and procedures, which shall reflect the Code’s principles.
- The purpose of this Code is to provide guidelines on the following:
 1. Arena Group’s commitment to establish ethical and professional standards expected of Employees
 2. Promote ethical behavior by outlining the principles and values of Arena Group
 3. Prevent improper payments, Gifts and gratuities, kickbacks and bribes to or from any Employee and third parties with whom Arena Group conducts business.
 4. Provide guidance on how to handle various situations and dilemmas that might arise in the workplace.
 5. Protect the Company by setting clear policies and procedures; the code helps to protect the organisation from legal and reputational risks.
 6. Ensure compliance with relevant laws, regulations, and industry standards.
 7. Foster a positive work environment by promoting a culture of respect, fairness, and accountability and mechanisms for reporting unethical or illegal behavior.

3. Scope

- Except to the extent that a contrary intention is expressed, this Policy binds and applies to all Employees.
- This Code applies to everyone who works for, with or represents Arena Group, regardless of the person’s position, role, status, experience, or formal relationship with Arena Group. Arena Group expects relevant Third Parties, including suppliers, consultants, and Business Partners to follow the Code’s spirit and comply with its principles.
- Nothing in this Code has the effect of invalidating past acts validly performed under previous Instruments.

4. Ownership

- The Chief Compliance Officer shall be the custodian of this document. The Ownership of the policies set out in this document lies with the relevant department.
- The Chief Compliance Officer must implement, monitor, evaluate, and review this Code, related policies, Instruments, and supporting documents of their relevant functions in accordance with the Group Strategy and Transformation department policies and standards and applicable laws and regulations.

5. Related Instruments and Supporting Documents

- The following are the Instruments and Documents that support this Code. It is the responsibility of the Chief Compliance Officer to ensure that they have the most recent version of the relevant Instrument or Supporting Document through communication with the Process Owner and/or the Group Strategy and Transformation Department.

| Reference Number | Name | Type |
|------------------|------------------------------------|--------|
| AG-CO-ABC-001 | Anti-Bribery and Corruption Policy | Policy |
| AG-CO-WP-001 | Whistleblower Policy | Policy |
| AG-CO-WP-001 | Conflict of Interest Policy | Policy |

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6. Compliance

- Arena Group takes a zero-tolerance approach to violation of this Code and is committed to act with integrity, honesty, and accountability in all its business dealings and relationship standards in all areas of its operations.
- All Employees are required to acknowledge annually that they have read, understood, and will comply with the requirements contained within this Code. This annual acknowledgment will be made in writing or electronically. New Employees will be provided a copy of the Code and will complete their acknowledgment during the orientation/ onboarding induction training.
- Those who fail to follow this Code put themselves, their colleagues, and the entirety of the Company at risk.
- Any potential breach of the Code will first be investigated and be verified. If confirmed, it may result in disciplinary and/ or legal action against the involved Employees and/ or legal action against any involved Third Parties.
- Disciplinary action will be managed according to the Disciplinary policy, as documented in Arena Group's Group HR Policy
- Third Parties shall communicate, educate, and exercise diligence in verifying compliance with this Code. Third Parties shall maintain records of all relevant documentation necessary to demonstrate compliance with the Code and related laws and regulations. The Company may engage in periodic monitoring activities to confirm the Third Party's compliance with this Code, including physical inspections of facilities/sites, use of questionnaires, or other measures necessary to assess Third Party compliance.



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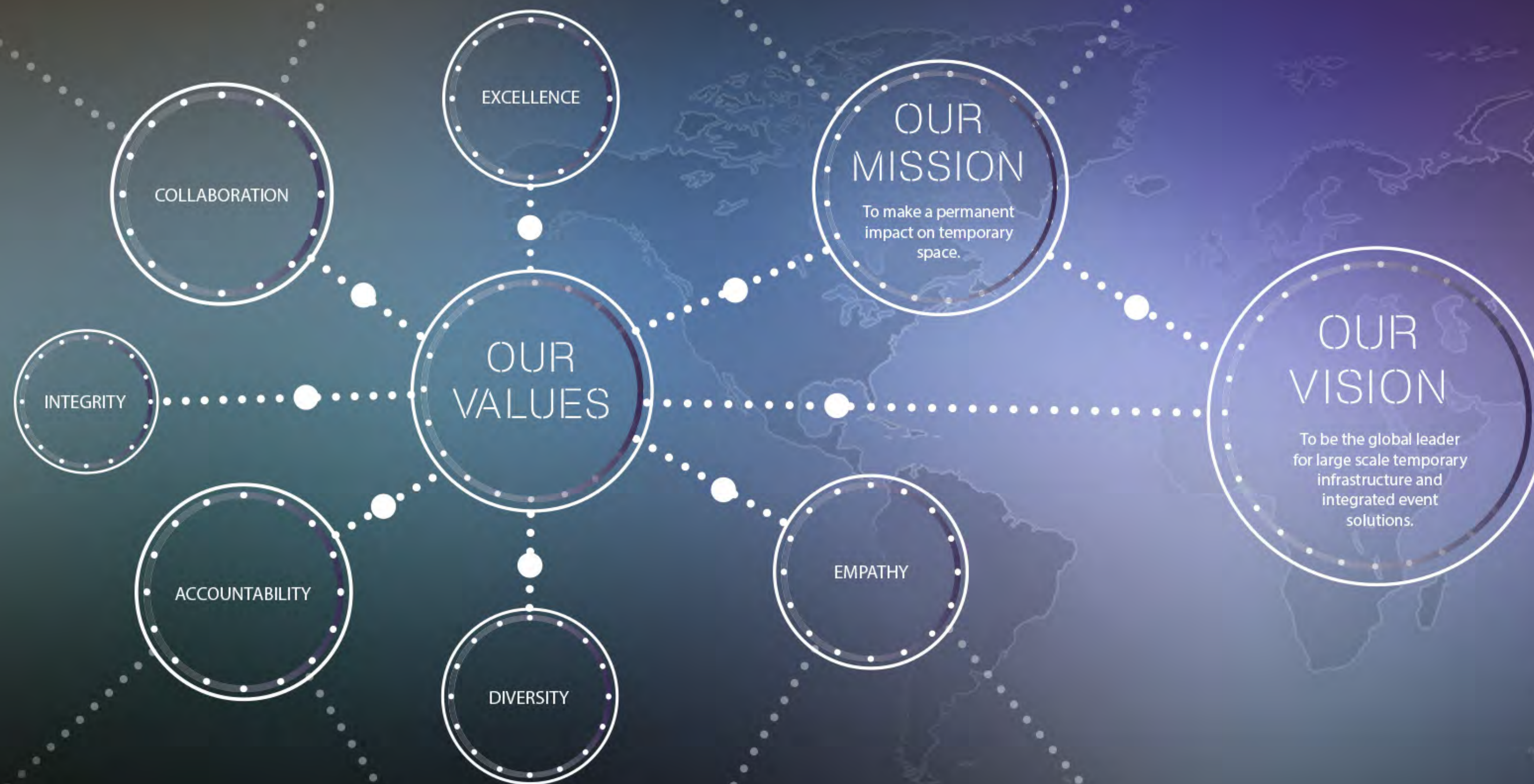
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PAUL BERGER
CHIEF EXECUTIVE OFFICER

Our vision, mission & values should act as a guiding star: inspiring and aligning each of us towards a common goal, helping us achieve the greatness that I know we are capable of by giving greater meaning to what we do.

B. Principles and Guidelines

1. Our Values

Arena Group Values

Integrity

Integrity is doing the right thing when no one else is watching.

Excellence

Excellence is not a skill. It's an attitude.

Empathy

The ability to understand and share the feelings of another.

Accountability

When You blame others, You give up Your power to change.

Collaboration

If everyone is moving forward together, then success takes care of itself.

Diversity

If Strength lies in differences, not similarity.

Our values guide us

When we succeed commercially, it drives our business forward. Simultaneously, by acting ethically and being an engaged part of society, we respect our principles on a global scale, positively impacting the community's well-being and prosperity.

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2. Roles and Responsibilities

2.1. Chief Compliance Officer

The Chief Compliance Officer is responsible to:

- Establish, maintain, and implement a robust code of business conduct framework, and training and awareness program.
- Provide ongoing training to the Employees in coordination with the Company Secretary and the People & Culture team, ensuring they are compliant with the Code's requirements.
- Ensure the identification and assessment of CBC risks within Arena Group's businesses, implementing a monitoring plan to review established policies and processes for compliance with the Code.
- Conclude on recommended courses of action on escalated CBC reported cases in consultation with the Legal team.
- Develop and implement policies, processes, and controls in line with evolving regulatory requirements to effectively manage and mitigate CBC risks.
- Promote and embed a robust and positive culture of compliance and ethics within Arena Group.
- Ensure a systematic mechanism is in place to record, review, monitor, and escalate the Code related matters as appropriate.
- Review requests for clarification and approvals related to the Code, taking appropriate action as necessary.
- Assess ethics and compliance risks, conducting testing to ensure internal controls respond to those risks.

Coordinate with the Group Internal Audit team to conduct investigations on reported alleged violations of the Code, reviewing remediation actions and ensuring their implementation.

- Respond promptly to any request for information by regulatory authorities, addressing urgent matters with priority.
- Represent Arena Group in response to all external inquiries related to the Code's matters.
- Keep abreast Group Compliance Champions of all issues and challenges raised, current trends and developments, reports filed with the regulators and all other compliance related matters.



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- Review adequacy and effectiveness of training and awareness programs.
- Conclude on escalated Code reported cases relating to the Chief Compliance Officer in consultation with the Legal team.

2.2. Management, and Legal Team

Management is responsible for:

- Implementing policies, processes and controls to manage governance in relation to the Code's risks.

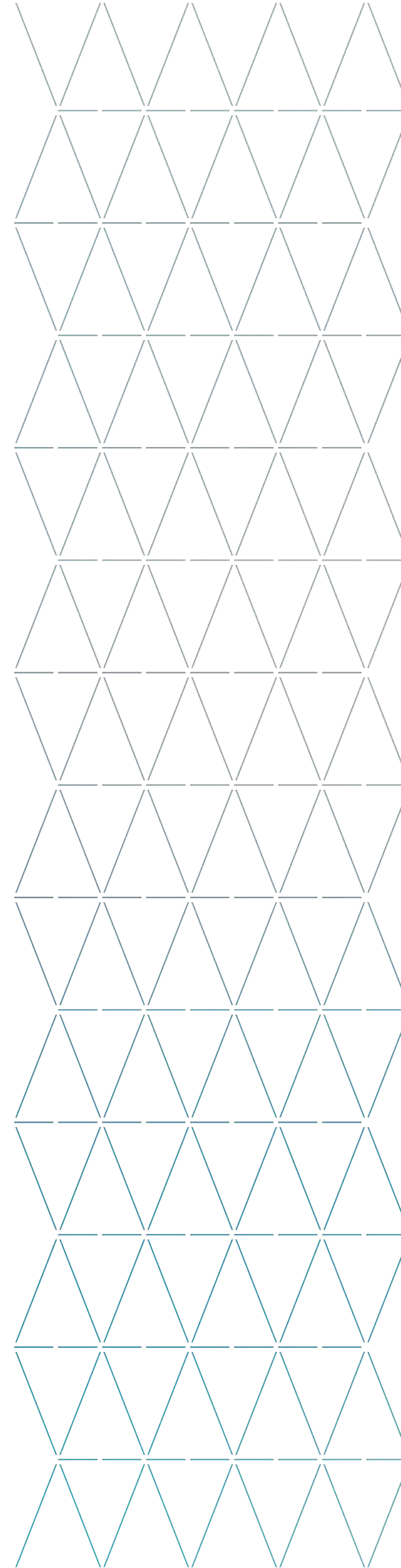
The Legal team is responsible for:

- Providing consultation support for regulatory interpretations related to matters raised by the Arena Group Compliance Champions.

2.3. Division Heads

The Management and Division Heads of Arena Group are responsible to:

- Coordinate with the Arena Group Compliance Champions to ensure the identification, assessment and control of the Code's risks within their respective Divisions under the Code and any requirements outlined in related policies and processes.
- Coordinate with the Group Compliance Champions to ensure that the requirements of the Code and related policies are embedded in relevant processes, controls and systems.
- Ensure that the Divisions' respective teams are trained on an ongoing basis as required by Applicable Laws.
- Promptly notify the Arena Group Compliance Champions of any issues/challenges faced for guidance or corrective action.



2.4. Employees

All Employees are responsible and accountable to:

- Act professionally, transparently, ethically, with due care and integrity maintaining confidentiality of information, as appropriate, in all business dealings in their day-to-day performance of roles and responsibilities.
- Ensure that they complete all Code-related annual/mandatory training and confirm annually their continued adherence to the CBC.
- Understand and comply with all applicable Code related policies and associated processes.
- Avoid activities that could give rise to the appearance of any potential violation of the Policy.
- If in doubt, consult with the Chief Compliance Officer or the Group Compliance Champions directly and / or by email on groupcompliance@arenagroup.com.
- Report any information which is reasonably believed in good faith regarding suspected violation or non-compliance, either to groupcompliance@arenagroup.com or anonymously through the Whistleblowing Portal available on the Company Website.

3. Compliance Matters

- Arena Group is committed to promoting behaviours that create trust and build Arena Group's brand equity.
- Employees are expected and are accountable to act professionally, transparently, ethically and with integrity maintaining confidentiality of information, as appropriate, in all business dealings in their day-to-day performance of roles and responsibilities.
- These behaviours ensure adherence to Arena Group's policies and processes, accuracy in recording of transactions, safeguarding of assets, and maintenance of confidential proprietary information thereby reinforcing Arena Group's core values.
- The Policy sets the guidelines for expected behaviours of Employees in relation to key areas of the day-to-day activities impacting Arena Group's reputation.

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3.1. Conflict of Interest (COI)

- Arena Group acknowledges and respects that its Employees have their own individual interests and have the right to engage in various activities provided that these activities do not directly and/ or indirectly lead to a situation that conflict with the overall interests of Arena Group.
- Conflict of Interest arises whenever the Employees have a competing professional or personal interest that may influence or compromise or appear to others to influence or compromise their independent judgment and/ or make it difficult for them to fulfil their duties impartially, regardless of whether it influences that judgment.

All Employees shall strive to avoid:

1. Utilising Arena Group's assets, information or position for personal gain.
2. Conducting any business with Business Partners in which they or their Family Members have vested interests.
3. Competing with Arena Group.

Refer to Arena Group's Conflict of Interest Policy for more details.

Scenario: Your family owns a business that competes with Arena Group. They ask You to serve as an advisor to the family business.

What should You do?

You should disclose the potential Conflicts of Interest to the Compliance Function for review and guidance.

3.2. Gifts and Entertainment

- Gifts are anything of value such as but is not limited to goods, meals and beverages, discounts, cash, services; use of vehicle or vacation facilities; cash equivalents (gold, gift cards, gift certificates); prizes; favours or travel expenses.
- Entertainment is where Employees attend an event at an expense of the provider, which may include and not limited to a sporting event or charity event or a concert, along with any associated travel, accommodation, meals and refreshments.
- Prior to accepting or providing any Gifts and Entertainment, considerations shall be made as to the Business Partner involved, reasonableness of the business purpose and if disclosed publicly, does it raise any potential risks.



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Prohibited Gifts and Entertainment include but are not limited to:

- Any form of cash or any monetary equivalents such as gift cards, gift certificates or cash envelopes.

1. To/ from a Business Partner that is engaged in a bid or tender process in which Arena Group is involved unless there is a prior approval from the Group Compliance Champions on the reported declaration.
2. To a Public Official, or their agent/ representative (whether directly or indirectly) unless there is a prior approval from the Group Chief Compliance Officer on the reported declaration.
3. If it places the Employee under any obligation or expectation of returning the benefit.
4. If it exceeds the value of AED 500 per year in case of a gift.
5. If any aspect of the Gifts and Entertainment (including nature, value, venue, or fellow guests) that is inconsistent with ethical, cultural, or professional norms would (if known) subject Arena Group to reputational risks.

Refer to Arena Group's Anti-Bribery and Corruption Policy for more details on Gifts and Entertainment.

Scenario: You have just completed the negotiation of a contract with an external supplier.

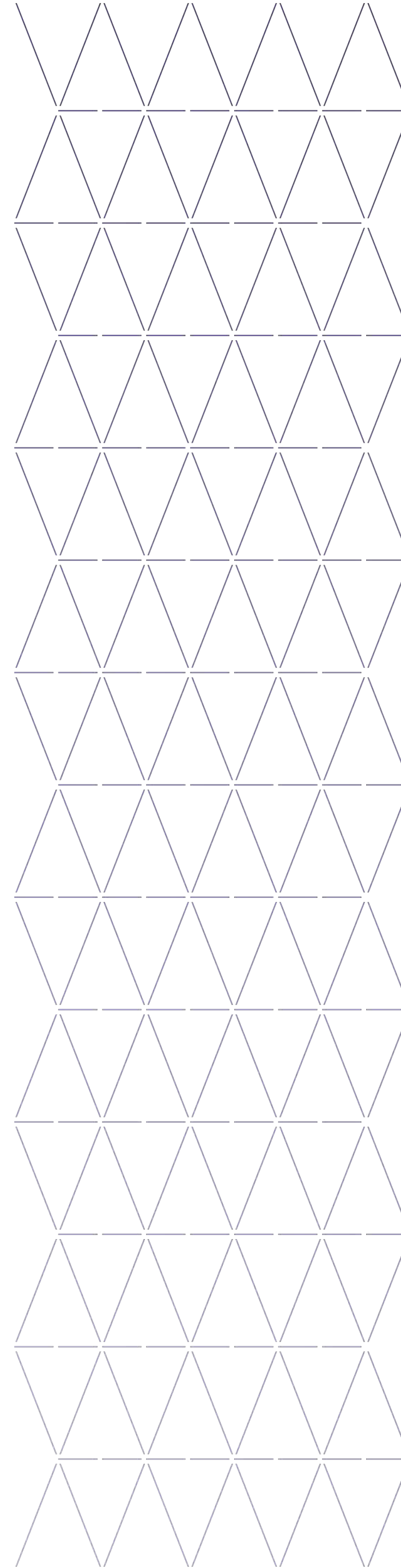
They offer You two VIP tickets, flights, and accommodation to Your favourite music artist's concert in Europe.

What should You do?

You should not accept the Gifts and should immediately report it using the established reporting channels. Accepting Gifts above the authorised limit as set out in this Code may create the perception of supplier influence. Your decision in awarding or negotiating the terms of the contract.

3.3. Insider Trading

- Insider Trading relates to the buying or selling of Arena Group's publicly listed securities, in breach of a fiduciary duty or other relationship of trust and confidence, while in possession of material, non-public information about the security.
- Employees who by virtue of the sensitive nature of their role have access to inside information are defined as Insiders on a permanent basis. Additionally, in the ordinary course of doing business, Employees may temporarily gain access to inside information and therefore qualify to be included in the Insider's list until that information becomes public or not material.



- Insiders' along with their Family Member(s)' trading activities of Arena Group's securities are monitored and controlled.

Refer to the Insider Trading Policy for more details on guidelines and restrictions related to Insider Trading.

Scenario: Due to Your job, You become aware of a new acquisition by Arena Group, that has not been announced. This acquisition is expected to significantly increase the stock price of Arena Group, and You therefore decide to purchase shares before the acquisition is officially announced.

What should You do?

You are prohibited from trading in stocks based on insider information. This will result in an investigation by the Compliance Function and may lead to legal penalties and fines. Always beware of sharing any insider information with any person before it is announced and follow the Company rules related to trading. If you are considering purchasing shares in a company for which you possess insider information, you must wait until that information has been publicly announced before initiating any trade.

3.4. Anti-Money Laundering (AML), Counter Financing of Terrorism (CFT)

- Arena Group shall not wilfully do business with any prospective Business Partner whose money or activity is believed to be derived from or used to support criminal, terrorist activity or is part of applicable sanctions circumvention attempt.
- Arena Group takes a risk-based approach in combating ML / TF and sanctions circumvention, and aims to identify, assess risks and allocate resources to manage these risks to safeguard the global financial and trading systems from being used as a channel for financing crime, terrorism and sanctions evasion.
- Transactions shall not be conducted with prospective Business Partners who fail to provide appropriate evidence of their identity, or who seek to deceive or evade regulatory or law enforcement agencies by providing altered, incomplete, or misleading information.
- Refer to Arena Group's AML and CFT Policy for more details.

Scenario: A Customer (Company ABC) purchased a property from Arena Group. The payment was completed as a wire transfer from a different company (Company XYZ) that You know nothing about and haven't heard of previously.

Outstanding stands worth cheering for.

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What should You do?

It seems suspicious. You should report it to the Chief Compliance Officer for advice.

3.5. Sanctions Compliance

- As a globally facing business, Arena Group develops business relationships with many counterparties around the world. Further to this, Arena Group undertakes many financial transactions in foreign currencies and therefore is obliged to maintain compliance with applicable national and international sanctions laws and regulations (Applicable Sanctions Laws).
- As Arena Group continues to rapidly grow and develop its business in new industry sectors and geographies, it is essential for Arena Group to document its policy and procedures formally in order to demonstrate how Arena Group complies with Sanctions Laws and to provide clear direction of where responsibilities are assigned in order to maintain this compliance.
- Processes managed by Sales, Procurement, Investments, HR, and any other Arena Group's departments that seek to establish relationships with counterparties must incorporate controls that adhere to, and interface with, Compliance & Ethics IDD processes, as applicable to their areas of responsibility and the risk exposure presented by the counterparty engagement.

Refer to Arena Group's Sanctions Compliance Policy for more details.

Scenario: You work in the procurement department and receives a request from a supplier based in a sanctioned country. The supplier claims they have a unique product that could benefit our operations. Business is eager to secure the deal but knows the potential sanctions risks involved.

What should You do?

Before proceeding, You should immediately consult the Compliance Champions and ask



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3.6. Anti-Bribery and Corruption

- Arena Group takes a zero-tolerance approach to Bribery, Corruption and Fraud and is committed to acting professionally and with integrity in all its business dealings and relationships.
- Arena Group is committed to complying with all applicable local and international anti-bribery legislation and conduct our business transparently. These obligations extend to any Third Parties acting in cooperation or on behalf of Arena Group (e.g., agents, consultants, brokers).
- Bribery involves offering, giving, receiving, or soliciting anything of value (including cash, Gifts, entertainment, employment, donations etc.) to influence a person's decision or action, usually against their duty to act in the best interests of their organization or to attain preferential treatment. Corruption is the abuse of power often through an individual position for personal gain.
- Employees are prohibited from offering, giving, receiving, or soliciting a bribe and from encouraging another person to do so on Arena Group's behalf.

For further details refer to Arena Group's Anti-Bribery and Corruption Policy and Fraud Control Policy.

Scenario: You are involved in a bid to develop some land. You are approached by an individual who represents the negotiators for the landowners. For the payment of an advisory fee, they can ensure that You will win the bid.

What should You do?

It appears that the individual is soliciting a bribe in the form of an advisory fee. You are prohibited from paying it and must decline the request. You must report it via the established reporting channel (i.e., to your Line Manager, the Compliance Champion or the Group Legal Department).

3.7. Dealing with Government or Public Officials

- Arena Group prohibits any activity that seeks to Bribe, Corrupt, or otherwise improperly influence a Public Official or equivalent to act (or omit to act) in a way that differs from that official or equivalent's proper duties, obligations, and standards of conduct in accordance with the relevant laws and regulations.
- Employees shall avoid even the appearance of impropriety or undue influence when dealing with Public Officials or equivalent or their Family Members.
- A facilitation payment is an unofficial financial payment made, directly or indirectly, to a Public Official or equivalent with the intention of prompting the public official or equivalent to perform, facilitate or expedite a routine act or administrative process that the Public Official or equivalent is required to perform as part of their ordinary duties (e.g., paying to expedite the issue of a license or permit). The offering of Gifts, hospitality or entertainment to a Public Official or equivalent may be perceived to be a facilitation payment.
- Facilitation payments are not intended to influence the outcome of the official or equivalent's action, but only its timing.
- Facilitation payments are considered bribes and are prohibited, even if they are common, customary, or required under unofficial rules that do not have the force of law.

Refer to the Anti-Bribery and Corruption Policy for more details and restrictions on dealing with Government or Public Officials.

Scenario: You are part of the team working on a project requiring certain approvals and authorisations from the Government. A Public Official approaches You and mentions that expediting certain approvals could happen if Your Company were to sponsor a local event he's organising.

What should You do?

You should politely decline the offer and report the incident to your Line Manager, the Compliance Champion or the Group Legal Department.

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3.8. Political Activities

— Arena Group maintains dialogue with societal stakeholders, including authorities and policymakers, on matters affecting our business operations. The Company maintains strict political neutrality and prohibits the use of its name, resources, or assets to promote any political parties or candidates.

To maintain political neutrality, Employees must:

1. Obtain prior approval per the Anti-Bribery and Corruption Policy before making any political or charitable contributions or commitments on behalf of the Company;
2. Keep personal political activities separate from work, and never use Company time, property, or resources for political purposes; and
3. Refrain from political fundraising or promotion of candidates during work hours or using Company resources.

Scenario: A local political candidate's campaign manager approaches You at work and asks if they can use the Company's conference room for an evening campaign event. They offer to make a donation to the Company's charitable foundation in exchange for the space.

What should You do?

You should politely decline the offer, explaining that Company policy prohibits the use of Company resources for political activities. The offered charitable donation in exchange for the space could be viewed as a form of political contribution, which requires prior approval under our Anti-Bribery and Corruption Policy. You should also report this request to Your Line Manager or the Compliance Champion.



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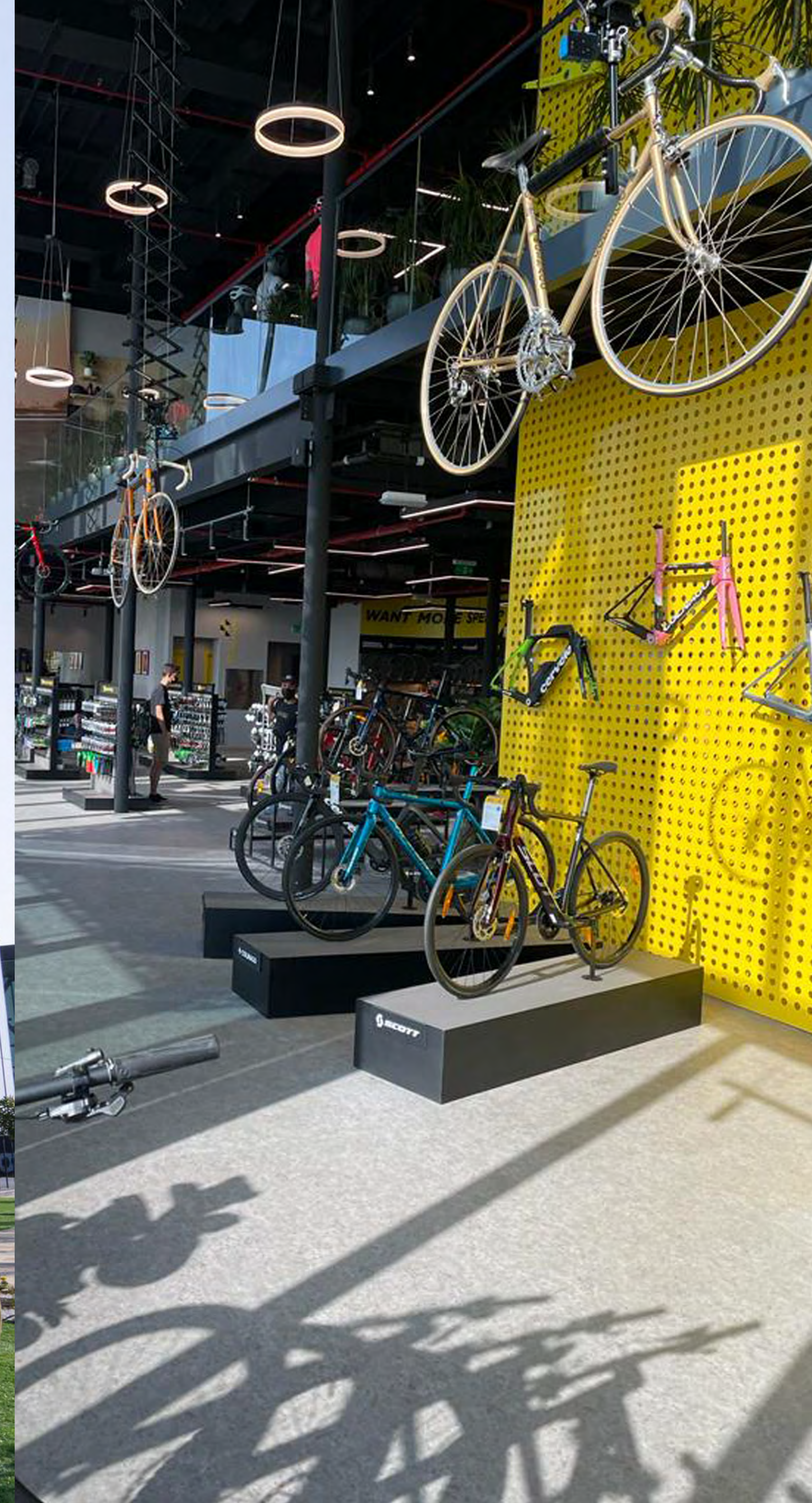
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4. Technology and Data

4.1. Information Security and Governance

— A substantial amount of information concerning Arena Group is stored, processed, and transmitted electronically. The data as well as media where it is stored and transmitted is part of Arena Group's property. In order to maintain an efficient operation, Arena Group's property shall be closely protected and used primarily for business-related purposes. This limitation includes, but is not limited to, the following:

- Employees shall exercise caution in safeguarding all electronic programs and technology, data, and communications, including any and all information accessed inadvertently or in error.
- Employees shall exercise a reasonable amount of caution in ensuring the physical security of Arena Group's property, especially when such property is used outside Arena Group's premises.
- Employees shall not use, modify, or provide access to Arena Group's property, except as expressly authorised by Arena Group.
- Employees shall not use Arena Group's equipment or systems to conduct any type of business for another company.
- Employees shall not use Arena Group's equipment or systems to view inappropriate websites or emails, including but not limited to, those containing offensive content.
- Employees shall ensure confidentiality of their credentials and passwords and shall follow relevant policies and procedures relating to passwords management.
- Employees should ensure respect of intellectual property and comply with software licensing agreements.
- Employees are prohibited from downloading copyrighted material with intent of violating the owner's intellectual property rights, whether it is website content, documents, images, software, or any other material that is protected.
- The Digital & IT team shall ensure proper implementation of security measures to protect data and ensure compliance with the relevant laws and regulations. All Employees and Third Parties with access to data must follow Arena Group's information security and information governance Policies.

Refer to the Group IT Policy for the detailed Information Security policy.



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Scenario: You are working at a café and leave Your laptop logged on to go to the bath-room.

What should You do?

This can lead to leak of confidential data as someone may access Your laptop without Your awareness. You should never leave any Company assets without securing them this includes public places as well as whenever You leave Your desk. You should always ensure protecting the privacy and security of the Company’s assets and information by locking and safeguarding the assets.

4.2. Data Confidentiality

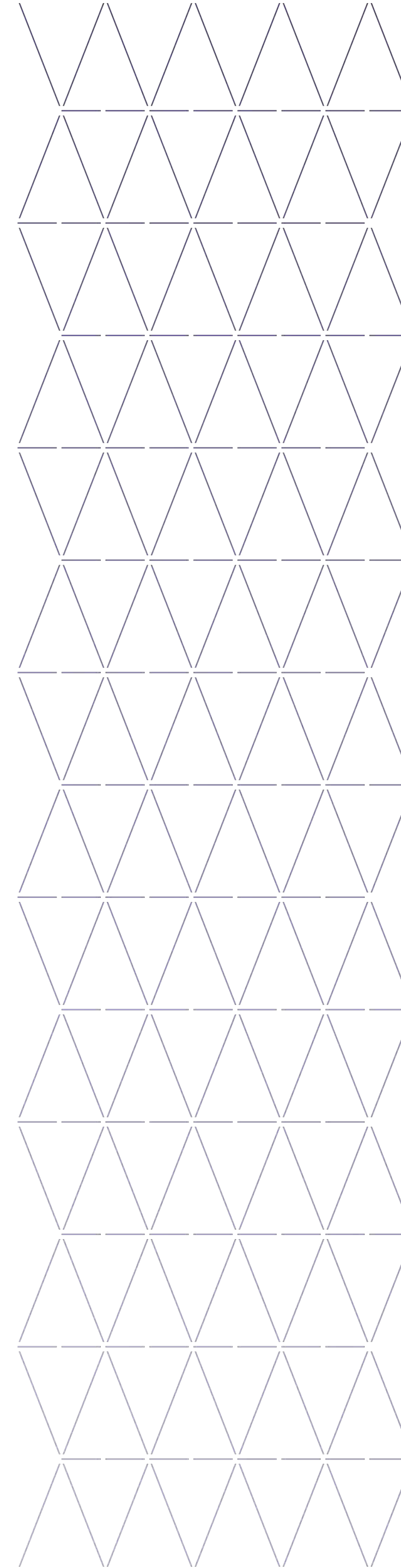
- Employees must consider all information (oral and written), documents and reports obtained in connection with a contract or pending agreement as strictly confidential and shall not disclose such information to any external parties unless previously authorised or required in the performance of their duties. This obligation will extend beyond the expiration of the contract or termination of the Employee engagement under the Contract.
- Employees must follow information classification guidelines as detailed in the Information Governance Policy to ensure proper handling of confidential data and restricted access and sharing of information depending on its classification.
- While a range of controls and measures are deployed and maintained, appropriate information handling depends on the vigilance and awareness of Employees. All Employees should be vigilant and not share any confidential data without prior authorisation.

Refer to the Information Governance Policy for details on information classification and restrictions.

Scenario: You accidentally sent an email containing confidential information related to customer data to the wrong person.

What should You do?

You should request the recipient to delete the email and not to view or use the information contained within it. You should report immediately the instance to Your manager.



4.3. Data Privacy

- Digitalization is a cornerstone of Arena Group’s strategy. We are committed to protecting personal data of our customers, business intermediaries, and Employees in accordance with applicable data protection laws, including but not limited to the General Data Protection Regulation (GDPR) and other relevant privacy legislation.
- The lawful and secure processing of personal data is fundamental to maintaining stakeholder trust and compliance with data protection regulations. These data protection obligations apply to all processing activities, regardless of location or working arrangement.
- Obtain informed consent before collecting, using or sharing personal data, in compliance with applicable data protection laws;

In accordance with applicable data protection principles and obligations, Arena Group shall:

- Adhere to the data minimization principle by collecting and processing only personal data that is adequate, relevant, and limited to what is necessary for the specified purposes;
- Process personal data only for specified, explicit, and legitimate purposes, and not in any manner incompatible with those purposes (purpose limitation);
- Implement appropriate technical and organizational measures to ensure appropriate security of personal data, including protection against unauthorized or unlawful processing, with access restricted on a need-to-know basis;
- Utilize Arena Group’s designated data processing systems and security protocols that are designed and maintained to meet applicable data protection requirements;
- Store personal data only in authorized systems that implement appropriate retention and deletion protocols in accordance with legal requirements;
- Ensure personal data is erased or anonymized once the specified purpose has been fulfilled, in accordance with applicable retention schedules and legal requirements.

Scenario: You are a sales representative at Arena Group working on a major client proposal. To make Your presentation more impressive, You’ve collected detailed personal information about the client’s employees from various social media platforms, including their photos, personal interests, and family details. You plan to use this information to personalize Your pitch and demonstrate thorough research. You’ve stored this information in Your personal cloud storage account for easy access.

Revise Your presentation to only include publicly available business information and data obtained through legitimate business channels.

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What should You do?

1. Delete all personal data collected from social media immediately, as this violates the data minimization and purpose limitation principles.
2. Transfer the collected data from Your personal cloud storage to Arena Group's authorized systems.
3. Review Arena Group's data protection policies and ensure You only collect business-relevant information through proper channels with explicit consent.
4. Inform Your supervisor about the current situation and seek guidance on compliant data collection practices.
5. Revise Your presentation to only include publicly available business information and data obtained through legitimate business channels.

4.4. Intellectual Property

- Arena Group's intellectual property – such as inventions, patents, copyrights, knowhow, trade secrets, designs and trademarks, and related licenses – are highly valuable assets, but that value can be lost or compromised if these are misused or inappropriately disclosed. Arena Group will take action to defend its intellectual property and is committed to respecting intellectual property that belongs to others.

In furtherance of our commitment to preserve our intellectual property we:

- Safeguard Arena Group's confidential intellectual property, including trade secrets, inventions, and designs, and obtain explicit written authorization before any disclosure;
- Respect and do not use material protected by intellectual property that belongs to others without Arena Group's approval and such third party's permission;
- Maintain strict confidentiality of all intellectual property and confidential information, whether belonging to Arena Group or third parties, and comply with all applicable confidentiality agreements, usage restrictions, and security protocols; and
- Immediately report any suspected misuse, infringement, or unauthorized disclosure of intellectual property (whether belonging to Arena Group or third parties) to Group Legal in accordance with Arena Group's reporting procedures.

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Scenario: A major client proposes a non-binding memorandum of understanding (MOU) to enhance the relationship with Arena Group and enable them to provide Arena Group with more business opportunities, albeit with no promise of any contract award. The client includes a legally binding obligation for Arena Group to provide a royalty-free, worldwide, irrevocable license to all of Arena Group's intellectual property.

What should You do?

You should immediately contact Group Legal for support with the MOU, whilst managing client expectations by indicating to the client that Arena Group's intellectual property is a key asset of the organization and is unlikely to be shared with any third party on a paid or unpaid basis.

5. Investigation and Disciplinary Actions

- Employees shall fully cooperate with all investigations conducted by Arena Group, whether conducted by teams within Arena Group or through a third party. Failure or refusal to cooperate with Arena Group's inquiries and investigations, or provide false information during an investigation, may result in disciplinary action consistent with the severity of the incident and potentially even punitive and legal proceedings if required by law.
- Employees must uphold the integrity of any ongoing investigation and preserve all records and materials relevant to any pending civil, criminal, or investigative procedure.
- Refer to the Group HR Policy for details on the Disciplinary Code and relevant investigation procedures.

Scenario: During an investigation taking place in the Company, for investigating a potential misconduct, the Compliance Officer reaches out to You for cooperation in the investigation.

What should You do?

You should cooperate fully with the Compliance Officer and answer all questions and provide all relevant information that You are aware of. Ensure You are transparent and honest. You should know that Your cooperation during an investigation will not result in any retaliation against You.

6. Acting with Integrity

6.1. Whistleblowing

- Arena Group promotes and supports a 'speak up' culture, encouraging the reporting of any concerns about Code violations or raising questions about the practical application or scope of the Code's requirements.
- BOD, Employees and Business Partners are encouraged and expected to report any irregularity or suspected irregularities in good faith including but not limited to unethical and unfair conduct, Bribery, Corruption, breaches to Arena Group's policies and processes, breaches of any laws and regulations.
- There are several channels available that Employees may utilise to report any suspected Code violations. Before deciding which channel to use, consideration should be given to the nature of the concern, the individuals potentially involved, and the Employee's comfort level. Arena Group encourages Employees to reach out to their direct line managers first. However, if for any reason an Employee is not comfortable with such a communication, Employees may refer to the below mentioned individuals, in the order of listing:

- Direct Line Manager
- Regional CEO
- Chief Compliance Officer

- Arena Group has implemented an anonymous Whistle-blower portal to facilitate the reporting of any irregularity or suspected irregularities in good faith.
- All whistle blowing complaints and information received shall be treated with utmost confidentiality.
- Whistle blowing must be distinguished from simply raising an Employee grievance which aims to serve an Employee's personal interest rather than Arena Group as whole.
- Arena Group does not tolerate any form of threat, retaliation or other action against Employees who speak up and report any misconduct. Retaliation against any individual who reports misconduct, participates in an investigation, or opposes discriminatory practices is strictly prohibited. Arena Group is committed to ensuring that all Employees feel safe and supported in raising concerns without fear of retribution. Any acts of retaliation will be met with serious consequences, in line with the Human Resources Disciplinary Procedures.



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An aerial photograph of a golf course clubhouse and surrounding area. The clubhouse is a large, multi-story building with a dark roof and white walls, surrounded by green lawns and trees. In the foreground, there are several golf courses with green fairways and sand traps. A winding path or road cuts through the landscape. The scene is captured during the day, with long shadows cast across the grass.

Building golf's
preeminent tradition.

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– If You are uncomfortable reporting Your concern to any of the above, or not satisfied with the outcome of Your reporting of the Concern, You can report through Arena Group's whistle-blowing channel, available on the Company website or by writing an email to groupcompliance@arenagroup.com.

Refer to the Whistleblower Policy for the detailed policy.

Scenario: During Your work, You notice one of Your team members violate the code of conduct by providing access to confidential information to an unauthorised person.

What should You do?

You should immediately report the violation to your Line Manager, the Compliance Champion or the Group Legal Department. If You prefer to remain anonymous You can submit the report through the whistleblowing channel on the Company website.

6.2. Communicating Responsibly

- Communicating with external Stakeholders plays an important role in protecting the reputation of Arena Group. This includes publication of information or releasing statements on behalf of Arena Group.
- Communication regarding Arena Group, with customers, colleagues, Stakeholders, media, or public personnel must be true, accurate and not misleading. Communication with external Stakeholders such as media and public channel must be through appropriate and designated Employees who are permitted to speak with the media.
- Any release of information or public representation of Arena Group needs to be approved and disseminated by authorised personnel to ensure that Arena Group's external communications are properly coordinated, timely, and accurate.

Refer to Arena Group's Marketing and Communications Policy for more details.

Scenario: You receive a call from a journalist at the local newspaper asking You about a new project that hasn't been officially announced yet.

What should You do?

You should not speak with a member of the press unless You are authorised to do so by the Marketing & Communications team. You should politely refuse to comment and ask for their contact details so that a member from the communications team can respond. You should ensure You are aware of the external communication guidelines as set out by the Marketing & Communications team.



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6.3. Environmental Sustainability

- Employees are expected to operate in an environmentally responsible manner and comply with all applicable environmental laws and regulations. Arena Group's sustainability commitment is aligned with the applicable regulations, international standards, and best practices prioritising sustainable development goals.
- Arena Group is committed to climate change, biodiversity, energy and water efficiency, material resources, and waste management, thereby expecting Employees to minimise any waste of energy, water or other natural resources.
- Process Owners shall have processes in place to ensure that their operations conform to all applicable environmental legislations. All required environmental permits, approvals and registrations are to be obtained, maintained, and complied in accordance with the conditions and requirements defined therein.
- Arena Group is committed to dealing with Third Parties that align with its overall sustainability strategy and meet its Environmental, Social, and Governance (ESG) requirements.

Refer to the ESG Policy for more details.

Scenario: You regularly print a lot of documents to share with Your colleagues and You wonder if there is a way to reduce paper usage.

What should You do?

You decide to send the documents by email rather than printing them. Small measures can make a big difference over time.

6.4. Product Compliance

- At Arena Group, we maintain an unwavering commitment to excellence throughout our entire product lifecycle. Each product is meticulously designed, manufactured, marketed, and leased or sold in strict accordance with all applicable legal requirements, industry regulations, and our comprehensive internal standards for quality, safety, and security. We recognize that regulatory compliance and adherence to these exacting standards are fundamental to establishing and maintaining customer trust. This dedication to compliance and quality not only ensures the integrity of our products but also drives sustainable success for both Arena Group and our valued customers, creating a foundation of reliability and excellence in everything we deliver.

Commensurate with our commitment to compliance, we:

- Maintain strict adherence to all applicable legal requirements, regulatory standards, and internal policies, particularly those governing emissions, safety protocols, security measures, hazardous materials handling, and component specifications;
- Maintain complete product compliance with all applicable standards and provide accurate, truthful representations of all product characteristics, with particular emphasis on safety features and environmental impact claims; and
- Develop new products and modify existing ones in accordance with all applicable regulatory and legal standards, ensuring continuous compliance from initial product launch throughout the required duration of the product lifecycle.

Scenario: You discover that a recently launched product line may not fully comply with new environmental regulations that will take effect in 90 days. The non-compliance relates to fire-safety standards that were updated after the product's initial development phase.

What You should do:

1. Immediately report the potential compliance issue to Your supervisor and the HSE Department.
2. Document all relevant information about the product specifications and the new regulatory requirements.
3. Work with the product development team to assess necessary modifications to meet the new standards.
4. Develop an action plan with clear timelines to achieve compliance before the new regulations take effect.
5. Consider temporarily suspending production/sales/leasing if compliance cannot be achieved before the deadline.
6. Maintain detailed records of all steps taken to address the compliance issue.
7. Coordinate with the Compliance Champion or the Group Legal Department to determine if any disclosures to customers or regulators are required.

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6.5. A Safe and Healthy Workplace

- Arena Group is committed to providing a healthy, safe, and secure workplace to all Employees who are impacted by its operations through a systematic approach to risk management, developing an effective Occupational Safety and Health (“OSH”) Management System, and focusing on meeting the needs of Stakeholders.
- All Employees are responsible for contributing to a safe working environment by following established safety procedures, reporting hazards promptly and participating in health and safety initiatives.
- Arena Group believes accidents, incidents, injuries, near misses, work-related illnesses and unsafe conditions are often preventable. By prioritizing safety in planning and operations, we ensure our work environment meets applicable health and safety laws and requirements.
- Accordingly, each Employee must:
 - Take responsibility for their own safety and the safety of others around them – correct or report hazards and address any unsafe behavior;
 - Know and follow all safety requirements, including the use of personal protective equipment;
 - Never take shortcuts or ignore required safety practices;
 - Ensure Employees are properly trained and equipped for their jobs;
 - Not use or possess illegal drugs or any firearm or weapon at work and never work while intoxicated or under the influence of drugs or alcohol.

Refer to ESG Policy and HSE Policy for more details.

Scenario: You notice that one of the lighting fixtures is loose and it could pose a danger to someone if it were to fall.

What should You do?

You must report health and safety hazards to protect Yourself and others. In this instance, it is appropriate to report it to the security or facility team in order to take proper action.

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6.6. Mutual Respect

— Arena Group maintains a commitment to fostering an inclusive workplace environment that promotes professional development, teamwork, and mutual support. We explicitly prohibit any behavior that creates an intimidating, offensive, or hostile work environment. Our organization is built on a foundation of mutual respect, both internally among team members and externally with our business partners.

— To uphold and implement our commitment to maintaining an inclusive workplace environment, all Employees must:

- Demonstrate professional respect and courtesy in all interactions with colleagues, clients, and business partners;
- Refrain from any form of bullying, intimidation, threats, or coercive behavior, whether verbal, physical, or written;
- Maintain professional conduct and avoid any behavior that could reasonably be perceived as offensive, inappropriate, or discriminatory by others;
- Exercise awareness and careful consideration regarding how their actions, communications, and behavior may impact or be interpreted by others in the workplace; and
- Promptly report any observed or experienced instances of harassment, discrimination, or other inappropriate conduct through appropriate reporting channels, including to Human Resources or management.

Scenario: During a team meeting, You notice that a colleague consistently interrupts and dismisses ideas presented by female team members, while being receptive and encouraging towards suggestions made by male team members. This behavior has been ongoing for several weeks, and You can see that it's affecting team dynamics and the willingness of female colleagues to contribute during meetings.

What should You do:

1. Document specific instances of the discriminatory behavior, including dates, times, and details of the interactions.
2. If You feel comfortable, speak privately with the colleague about their behavior and its impact on team members and productivity.
3. Report the situation to Your Line Manager or Human Resources, providing Your documented observations.
4. Actively support and encourage participation from all team members during meetings.
5. Continue to monitor the situation and report any retaliation or continued discriminatory behavior.

6.7. Fair Employment Practices

— Arena Group values a diverse workforce and expects hiring managers to observe applicable laws against discrimination. Employment decisions like hiring, pay, title, promotion, discipline, termination or working conditions should be based on a person's ability or performance, not on irrelevant personal factors.

In accordance with our commitment to workplace diversity and equal opportunity laws, we:

- Evaluate candidates solely on merit, including qualifications, skills, and relevant experience.
- Report any observed discriminatory behavior or suspected instances of unfair discrimination through appropriate channels.

Scenario: During a hiring process, You overhear a hiring manager expressing reluctance to interview a qualified candidate because “they’re probably too old to keep up with our fast-paced environment.” The candidate has over 15 years of relevant experience in the industry.

What should You do:

1. Document the incident, including the date, time, and specific comments made.
2. Report the situation to Human Resources or through the appropriate reporting channels outlined in Company policy
3. Remind the hiring manager that age-based discrimination is illegal and violates Company policy.
4. Ensure the candidate receives fair consideration based solely on their qualifications and experience.
5. Follow up with HR to confirm appropriate action has been taken to address the situation.

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Delivering a world-class bespoke arena at Wimbledon Courts.

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6.8. Competition Laws

Laws and regulations which relate to unfair competition and antitrust may result in severe penalties for the companies as well as individuals who are found breaching them. Some of these laws, despite their international application, may also cover the activities of companies in the countries in which we operate (i.e., domestic activities). Employees shall ensure that Arena Group's activities are in full compliance with the relevant laws and appropriately address any risks of breaching them.

Scenario: You are at a conference event. One of Your competitors asks about Your pricing strategy. They suggest it could be beneficial if You both set prices at the same level.

What should You do?

You should highlight that it is inappropriate to discuss such matters, excuse Yourself from the discussion, and report it internally.

6.9. Respect for Human and Labor Rights

Arena Group upholds internationally recognized human rights and strictly complies with all applicable employment laws, including those governing working hours, rest periods, compensation, and benefits. We maintain a zero-tolerance policy against all forms of modern slavery, forced labor, and human trafficking. We prohibit child labor and protect children's educational and developmental rights. We fully respect both the right to unionize and the right to refrain from union membership.

Commensurate with our commitment to human and labor rights, we:

- Actively protect and promote human rights;
- Provide all Employees with clear, comprehensive information about their employment terms, conditions, rights, and obligations;
- Maintain all employment conditions, including working hours and compensation, in full compliance with legal requirements and collective bargaining agreements;
- Strictly prohibit and actively prevent all forms of modern slavery and forced labor throughout our operations and business relationships;
- Never hire children under 15, even if it is permitted by local law; and
- Guarantee Employees' unrestricted right to seek union guidance and support, while strictly prohibiting any management interference in union-related decisions or membership choices.

Scenario: While conducting a supplier audit, a member of the Arena Group team discovers that a subcontractor employed by one of Your key vendors is utilizing underage workers (14 years old) for light assembly tasks.

The supplier argues that local laws permit children aged 14 to work part-time, and that these children are helping their families financially. However, Arena Group's Code of Conduct strictly prohibits the employment of children under 15, regardless of local legal allowances.

What should You do?

You should highlight that it is inappropriate to discuss such matters, excuse Yourself from the discussion, and report it internally.



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7. Guidelines for Situations not covered by this Code

– The Code does not cover all possible situations and scenarios therefore when confronted with a potential ethical or legal conflict, the BOD, Employees and Business Partners before making a final decision should make the following consideration:

– If all the related facts were made public, would You be embarrassed, or would the activity subject Arena Group to reputational risks?

– If the answer to the above is “no”, then the concerned BOD member, Employee or Business Partner should feel comfortable moving forward. Otherwise, raise a query for clarification by sending an email to groupcompliance@arenagroup.com.

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8. Reporting, Monitoring, and Testing

- The Group Compliance Champions must report on all compliance related matters.
- The Group Compliance Champions shall develop a compliance monitoring program to periodically review the various BU's compliance / adherence to the process and systems developed.

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9. Record Keeping

— Arena Group shall keep financial books, records and accounts, and have appropriate internal controls in place which will evidence the business reason for concluding on the Code.

— Arena Group is obliged to maintain detailed records, documents, data and statistics for all transactions and due diligence records and documentation associated with its Code risk assessment and mitigation measures for a minimum period of six (6) years. Arena Group shall maintain all such records and make such records available for audit purposes or to any of the regulatory authorities upon request.



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10. Communication and Training

— The Code is accessible and cascaded to the Employees across Arena Group in coordination with the Business Excellence team via the Company Intranet. Management and/or the Group Compliance Champions may periodically communicate to Employees regarding the principles set out in the Policy and other compliance-related communications.

— Employees must complete an induction and ongoing training. The Group Compliance Champions shall conduct refresher subject-matter trainings on the principles set out in the Policy. The trainings shall be scored to evaluate their knowledge and provide continued understanding and awareness of their responsibilities towards the Code. Frequency of on-going trainings can be yearly or as deemed fit by the Chief Compliance Officer pursuant to any new/revised guidelines, etc.

— Open Door Policy - Employees must have easy access and open communication to Management and the Group Compliance Champions to highlight day-to-day operational investigation and case resolution related challenges as applicable.

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 - 6.3 Environmental Sustainability
 - 6.4 Product Compliance
 - 6.5 A Safe and Healthy Workplace
 - 6.6 Mutual Respect
 - 6.7 Fair Employment Practices
 - 6.8 Competition Laws
 - 6.9 Respect for Human and Labor Rights
7. Guidelines for Situations not covered by this CBC
8. Reporting, Monitoring, and Testing
9. Record Keeping
10. Communication and Training

C. Appendix

1. Frequently Asked Questions

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• What is the Code of Business Conduct?

This Code sets out Arena Group's expected standards of ethical and personal conduct for all Employees. It also helps Employees to understand and comply with Applicable Laws.

• Why is the Code Important?

The adoption of high standards of ethical and personal conduct helps maintain Stakeholders' trust, comply with Applicable Laws, and ensure Arena Group's ongoing success and transparency.

• Who does the Code apply to?

The Code applies to all Employees. We encourage Third Parties who work with or represent Arena Group to follow the code and adopt similar standards.

• Where to get further guidance about the Code?

The code cannot cover every scenario. You are expected to use good judgment and seek guidance from Your Line manager, or the Compliance Champions as required.

• What happens if You fail to comply with the Code or law?

Failure to comply with the Code or the Law can result in legal, regulatory, and other sanctions including the imposition of financial penalties and damages to Arena Group. It can also lead to disciplinary action as per the Human Resources policies and procedures.

Compliance with the Code is a condition of Your employment, and You must acknowledge awareness of the Code on an annual basis.

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