

Namco Solutions

CODE OF CONDUCT

DO THE RIGHT THING
TO PROTECT PEOPLE & ENVIRONMENTS



Namco Solutions

NSL09-01-00-CODEC-01 Rev C2

01/11/2016

NAMCO SOLUTIONS

BUSINESS ETHICS, ENVIRONMENT, HUMAN RIGHTS & EQUALITY

CODE OF CONDUCT

PREPARED FOR:

All Employees

All Contractors & Sub Contractors

All Site Visitors (Optional)

PREPARED BY:

Dan Vu
Company Director
Namco Solutions Limited
Orchard House
Loughborough Road
Hathern
Leicestershire
LE12 5JB
United Kingdom

Tel: +44 (0)7877 632 078

Email: dan.vu@namco-solutions.com

Website: www.namco-solutions.com

Document Reference: NSL09-01-00-CODEC-01

Revision: C2

C2	01.11.2016	ISSUED TO INCLUDE MD SIGNATURE	D.VU	E. VU	D.VU	n/a
C1	01.01.2009	ISSUED FOR USE	D.VU	E. VU	D.VU	n/a
A1	01.01.2009	ISSUED FOR MANAGEMENT REVIEW	D.VU	E. VU	D.VU	n/a
REVISION	DATE	DESCRIPTION	ORIGINATOR	CHECKED	APPROVED	CLIENT APPR

Document Title:

**BUSINESS ETHICS, ENVIRONMENT, HUMAN RIGHTS & EQUALITY
CODE OF CONDUCT HANDBOOK**

Document No: NSL09-01-00-CODEC-01- Rev C2

Message from Company Managing Director

Let us do the right thing today in all of our business activities to protect our people, our customers, general public and the environment for a sustainable future of our organisation. By doing the right thing and in compliance with laws and regulations, we can protect the environment, stamp out corruption and remove unfair employment practices. Our customers and the general public expect us to operate to a high ethical standard. Our business conduct as well as our personal conduct must always reflect our core values which build on trust and uphold our reputation for integrity. Our Code of Conduct clarifies what is expected from each of us on an individual level. The Code is ours, and we all have a responsibility to live up to its standards – wherever you are and wherever you go with us.

You represent Namco Solutions and therefore need to know the Code of Conduct and act in line with it. We are expected to conduct ourselves and our business with respect and sensitivity. Discuss with your manager if you feel pressure to act in a way that might compromise our integrity. If you see or know of possible violations of the Code, I encourage you to report them.

Please take the time to read this document carefully. Keep it with you as a useful reference and act on the advice it offers. Make sure you do not become complacent. Remember: it is vital to maintain your focus on safety, integrity and work ethics at all times. If we all do so together, we can create a business which is second to none.



Dan Q Vu
Managing Director

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1 INTRODUCTION

At Namco Solutions, we believe that all of our people are entitled to the same level of protection regardless of where in the world they work. Our business model is based upon trust: Trust in the quality of what we do, trust in the integrity with which we perform, and trust in the impact and value we deliver. Our success depends on trust at all levels and in all business environments.

Trust can only be achieved if we persistently maintain high standards of business and personal conduct. Our Code of Conduct (hereinafter “Code”) is built on Namco Solution’s Values. The purpose of the Code is to ensure that all of our services and activities are carried out in compliance with all applicable laws and regulations. In the event that the Code differs from applicable laws and regulations, the highest standard consistent with local laws must be applied.

Moreover, the Code provides a framework for what we consider ethical, responsible and sustainable conduct: Conduct which will make a positive contribution towards our ambitions and Vision as a company. The requirements and expectations set out, together with our Values, constitute the basis of our corporate activities.

The Code is not an exhaustive guide covering every situation. Instead it outlines high-level principles in two main areas: how Namco Solutions conduct its business; and the personal conduct of people involved in the business of Namco Solutions at all levels in the organization, both in ordinary work situations and in cases where there are challenges to their personal or professional integrity.

You are expected always to use your best judgment, care and consideration in your work for Namco Solutions. The Code is designed to offer guidance and encourage you to make the right choices as you perform your work.

We are committed to adhering to the principles of United Nations Global Compact in the areas of human rights, labour standards, environmental protection and anti-corruption in our business strategy, day-to-day operations, organizational culture and sphere of influence.

Our Values

- We build trust and confidence
- We never compromise on safety, quality or integrity
- We protect environment and maintain a sustainable future.
- We are committed to teamwork, performance and innovation
- We care for our customers and for each other
- We embrace change, collaboration and deliver results

People who are new to Namco Solutions may be unfamiliar with how Namco Solutions manages Code of Conduct in their working environment. Please do not hesitate to ask your line manager to explain anything you are unsure about.

2 SCOPE AND RESPONSIBILITY

We are committed to an incident-free workplace, every day, everywhere. We continue to minimize the impact of our activities on the environment.

This Code of Conduct applies to all employees of Namco Solutions and its subsidiaries (hereafter “Namco Solutions”), as well as to temporary employees, hired contractors acting on behalf of Namco Solutions, and anyone who holds a position of trust in Namco Solutions, including the Company Directors.

Each one of us is responsible for reading and understanding the content of this Code and related documents. You must conduct your tasks and responsibilities for Namco Solutions in accordance with the requirements and principles that are set out in the Code. You must not act or encourage others to act contrary to this Code, even if such deviations may under the circumstances appear to be in the commercial interest of yourself, your business unit or Namco Solutions as a whole. If it is not clear whether a particular activity is legally or ethically acceptable, you should consult with your line manager.

Our goal is to develop Namco Solutions to become a global company. Therefore, we may face local individual, cultural or administrative practices that may be contrary to the spirit and provisions of the Code. Nevertheless, violations of the Code will not be tolerated and may lead to internal disciplinary actions, dismissal, or even criminal

prosecution. It is the responsibility of the Namco Solutions senior management and all line managers to make the Code known to employees and to promote and monitor compliance with the Code in part of the organization.

3 COMPLIANCE WITH LAWS, RULES AND REGULATIONS

We must observe the laws of the countries where we operate. Namco Solutions is obligated to observe the various legal and cultural frameworks of those countries. You are expected to know relevant local laws and maintain generally accepted customs insofar as they are compatible with the principles in the Code.

Even allegedly minor breaches of law during business activities can result in major damage to our business partners, customers and Namco Solutions, as well as seriously jeopardize our good reputation. Violating laws and other binding regulations may also have far-reaching consequences in terms of labour and penal law.

In addition to compliance with law, you must adhere to internal rules and regulations, including Namco Solutions local management system.

4 CONDUCT OF BUSINESS

Our ability to create value depends on exercising high ethical standards in all our dealings with colleagues, partners, suppliers and other stakeholders of Namco Solutions.

4.1 QUALITY OF OUR BUSINESS

Namco Solutions's services to customers must meet the highest standards of quality and integrity. Our customers should have trust in what we deliver, and be met and treated with respect, enthusiasm, openness and a willingness to collaborate. You must undertake all services professionally and in accordance with agreed rules, standards, methods, and policies.

You must maintain your impartiality and independent judgment, and never surrender to pressure and/or incentives to misrepresent findings or to alter certificates, the results of inspections, audits or tests. The information in reports and certificates that are issued must be truthful and accurate. All work, findings and results should be adequately documented.

4.2 AVOIDING CONFLICT OF INTEREST

Whilst representing Namco Solutions, you must avoid conflicts of interest and any combination of roles and services that could be perceived as representing a threat to the impartiality and independence that are the basis for our services. This requires a professional, independent and impartial treatment of job-related tasks.

In particular, we do not classify, certify or verify our own work.

4.3 FAIR AND OPEN COMPETITION

Namco Solutions's policy is to compete vigorously and fairly, in full compliance with all applicable antitrust and competition laws. Commercial policy and pricing will be set independently and will never be agreed upon with competitors or other non-related parties.

Agreements with competitors, or any other activities which unduly obstruct free and open competition, influence prices, or allocate business areas, geographies or clients, are not allowed.

You must not schedule or accept meetings with competitors without an agenda and minutes of meetings being made. During meetings with competitors, it is not allowed to exchange internal data such as prices, costs and customer information. Legally protected information, as well as information that is relevant for competition, must not be disclosed to third parties.

4.4 CORRUPTION

Whilst representing Namco Solutions, you must conduct its business in a fair and transparent manner. There is a zero-tolerance policy against corruption and trading in influence. Corruption or bribery is the abuse of a position of trust to acquire personal or business benefits for Namco Solutions, yourself or others without being legally entitled

to these benefits. Trading in influence exists when an improper benefit is provided to someone in order indirectly to influence the performance of the duties of a third party (for instance a relative, an acquaintance or others with access to a potential business partner or decision maker).

This prohibition applies both to the party giving or offering an improper benefit, and to the party who requests, receives or accepts such advantage. For the matter to be considered illegal, it is sufficient that a demand or an offer of improper benefit is made. Any behaviour which might cause the suspicion of bribery or trading in influence is forbidden. This applies in particular to the use of irregular ways of payment.

4.5 GIFTS AND HOSPITALITY

No presents or bonuses which have the effect of or even the appearance of impacting or impairing the ability to reach an independent decision should be accepted from or given to clients or business partners. Excepted are modest gifts for special occasions, or advertising gifts, as well as invitations that involve a business purpose. Giving or accepting monetary gifts is prohibited under any circumstances.

Regardless of value, benefits must not be offered to anyone if such benefits are intended to affect the outcome of business transactions. Similarly, you must not accept such benefits from Namco Solutions's business contacts or persons or companies connected to them.

4.6 SPONSORSHIPS AND CONTRIBUTIONS

Namco Solutions upholds a strict policy of neutrality in the political process of any country where it operates. Namco Solutions does not contribute funds or resources to any political party, elected official or candidate for public office in any country. In some instances, Namco Solutions may offer charitable donations, sponsorships or other forms of contributions under strict guidelines.

4.7 RELATIONS WITH INTERMEDIARIES AND BUSINESS PARTNERS

The principles of this Code are also applicable to intermediaries and partners.

If Namco Solutions uses intermediaries, including agents, sponsors and consultants to promote its services, these must be selected based upon their substantiated commercial value for Namco Solutions. The scope of services to be provided should always be clearly stated, payment mechanisms should be transparent, and the size of the payment should be proportional to the level of services provided.

In some jurisdictions, Namco Solutions must cooperate with legislative or administrative requirements and use the services of local business partners or sponsors. The requirements set out in this clause apply to such agreements as well.

4.8 GOOD WORKING ENVIRONMENT

Namco Solutions is committed to protecting and advancing the health and well-being of its employees worldwide. Namco Solutions strives for diversity at all levels of the organization and is firmly committed to providing equal opportunity in all aspects of employment. Namco Solutions will treat all employees fairly and with respect and will not tolerate any form of discrimination or harassment on the basis of gender, religion, race, national or ethnic origin, cultural background, social group, disability, sexual orientation, marital status, age or political opinion.

Namco Solutions works to ensure a safe and healthy work environment for all employees. Health and safety functions are established in all offices, and basic HSE training is mandatory for all employees. Namco Solutions values dialogue and has broad geographic employee representation in its Board of Directors.

All employees have the right to express their views and concerns in good faith, in accordance with this Code. All employees have the right to join labour union(s) and participate in organized activities.

4.9 ENVIRONMENTAL STEWARDSHIP

Namco Solutions works to reduce the environmental impact of its own operations, procurements, investments, and property management. As the world faces unprecedented environmental challenges, we take our impact on the environment seriously and see it as our responsibility to help change this course.

Namco Solutions will minimize its emissions and consumption of energy and natural resources and will actively contribute to environmental protection by promoting the development and propagation of environmentally friendly technologies.

4.10 PERSONAL DATA AND CONFIDENTIALITY

We will protect confidential, secret, and personal data. This is one of the key principles on which we base our relationships with our employees, customers, and suppliers. You must obey personal data protection requirements, as well as statutory and company rules.

When taking up work with Namco Solutions, all employees and subcontractors must sign a declaration of secrecy. You must comply with applicable copyright laws and confidentiality obligations. Data and information must always be handled in a manner that protects the interests of Namco Solutions and our customers.

Both during the term of your employment and afterwards, company and business secrets must be protected from being divulged to unauthorized persons. This includes not only the company's internal interests but any information which concerns Namco Solutions customers and their business matters.

4.11 ACCURATE AND COMPLETE DATA, RECORDS, REPORTING AND ACCOUNTING

Namco Solutions is committed to transparency and accuracy in all of its dealings. This includes compliance with generally accepted accounting principles at all times. All accounting records must also be kept and presented in accordance with the laws of the applicable jurisdiction.

4.12 INFORMATION AND IT SYSTEM SECURITY

Namco Solutions is committed to upholding an appropriate standard of information handling security. Therefore, you are not allowed to use information in a way that may jeopardize the integrity of Namco Solutions.

Information considered illegal, offensive or inappropriate must not be accessed, processed, downloaded, stored or disseminated on your work computer. Installing software or downloading, storing, using or disseminating data or information in breach of copyright laws or provision is prohibited. Material of a sexual nature is considered inappropriate.

4.13 INTERNAL MONITORING SYSTEMS

Internal controls are an integral part of Namco Solutions's ongoing business activities and ensure that we adhere to the applicable laws and internal regulations. Their purpose is to allow the continuous inspection and improvement of all company procedures. We will ensure that our monitoring system is suitable and meets all applicable legal requirements

4.14 RISK MANAGEMENT

Taking risks can not only jeopardize the reputation and business success of Namco Solutions, but result in damage to customers, business partners and colleagues. In order to identify and minimize potential risks at an early stage, and to avert potential damage, Namco Solutions has a risk management policy and process in place.

4.15 HEALTH, SAFETY, ENVIRONMENT AND QUALITY

Namco Solutions is committed to an incident-free workplace, every day, everywhere. Our performance depends on our ability to continually improve the quality of our products and services we provide to our clients, while protecting people and minimising the impact on the environment. Namco Solutions requires an active commitment to HSE from all our people, our contractors and visitors in all work activities. We will always communicate openly on HSE issues with our stakeholders and share with them our experience and knowledge of successful HSE initiatives.

Policy implementation -The Company has an HSE Committee which oversees all HSE matters. This Committee is chaired by the company Managing Director and establishes procedures and guiding principles as it deems necessary to carry out the Company HSE policy. The Company has established and maintains

assessment, self-evaluation and audit programmes to monitor the Company's compliance with this Policy. A Compliance audit report is to be presented to the Namco Solutions Directors when requested.

Compliance with relevant legislation - The Company shall comply with all applicable laws and regulations in the countries where we operate.

Risk Management - The Company strives to mitigate the impact of any foreseeable hazards, which may endanger health, safety and the environment, or could affect the quality of products and services it provides. This will be achieved through formal risk assessments as required per Company Policies and Procedures.

Training - The Company is committed to provide training and development needs as appropriate for each individual's duties and responsibilities – this will always include HSE training. Line managers are responsible for ensuring that appropriate training is given and individual competency evaluation is conducted as per the Company's standards.

5 CONDUCT OF BUSINESS

5.1 WE VALUE INDEPENDENCE

You must not, directly or indirectly, accept gifts which are intended to influence business decisions, except for promotional items of minimal value normally bearing a company logo. You may accept other gifts in situations where it would clearly give offense to refuse, in which case the gift must be handed over immediately to your line manager and will be regarded as Namco Solutions property.

Hospitality, such as social events, meals or entertainment can be accepted if there is a clear business reason for Namco Solutions.

5.2 WE VALUE IMPARTIALITY AND INTEGRITY

You must not, at any time, participate either directly or indirectly in any kind of business or activity that competes with or is detrimental to the interests of Namco Solutions. The same is true if it has the effect or the appearance of affecting the impartiality and integrity of Namco Solutions or yourself. You may not use corporate property, information or your position for personal gain.

If you wish to hold a position on the board, or perform a similar function in the governing body, of a company or institution of a commercial nature external to the Namco Solutions Group, you must first obtain the approval of your line manager. If the company or institution could be perceived as a competitor to Namco Solutions, such a role must be approved by the Managing Director.

You must not have any financial or other interest, directly or indirectly, in any business or activity where the fact of your having such an interest could call into question your or Namco Solutions's integrity and impartiality.

You cannot be involved in a recruitment decision concerning your immediate family. Immediate family members will not be employed in, or remain in, closely related positions, where a possible conflict of interest may occur, or where one may become aware of confidential information affecting the other. For the purpose of the Code, "immediate family" is defined as your father, mother, spouse/fiancée/ co-habitant, child, brother or sister, or the father, mother, child, brother or sister of your spouse/ fiancée/co-habitant.

5.3 WE TREAT EACH OTHER WITH DIGNITY AND RESPECT

In Namco Solutions, we treat each other with mutual respect and dignity. Respect is at the heart of building a successful cooperation between the company and each of us. Business and personal decisions will be taken in accordance with the general policy of equal treatment as defined by objective, comprehensible criteria.

You must not discriminate or be discriminated against, i.e. placed at a disadvantage for no objective reason, on the basis of race, gender, age, nationality, ethnic background, skin colour, political opinion, sexual orientation, religious beliefs, marital status, physical constitution or other personal characteristics.

Namco Solutions will not tolerate personal insults or any other form of harassment, including sexual harassment, in the workplace. Sexual harassment includes all forms of unwelcome verbal, nonverbal or physical conduct of a sexual nature. Demeaning comments about an employee's appearance, questions or comments about his or her sex

life, sexual coercion and undesired sexual acts are prohibited. Namco Solutions is against the purchase of sexual services. When representing Namco Solutions, you must refrain from purchasing sexual services.

5.4 WE USE COMPANY PROPERTY AND ASSETS APPROPRIATELY

The use of Namco Solutions's materials, financial assets or facilities for purposes not related to Namco Solutions's business is prohibited unless it is specifically approved by management or authorized by a manager who has the authority to do so. Private use of Namco Solutions personal computer systems is allowed, as long as it does not expose Namco Solutions to litigation or negative consequences, interfere with job duties, breach Namco Solutions policies and instructions, or degrade the performance of the Namco Solutions systems or networks.

5.5 WE COMMUNICATE TRANSPARENTLY AND HONESTLY

The Namco Solutions brand-profile in domestic and international markets is greatly influenced by our ability to communicate consistently and professionally with external parties, including the media. In Namco Solutions, we maintain a principle of openness and are honest and responsive when dealing with interested parties.

To build and protect the Namco Solutions brand and image, the Managing Director will represent Namco Solutions in instances when a senior management presence would be beneficial. Communication professionals in the global communication departments in the business areas are the designated spokespersons. In addition, when assigned by business areas communications, managers and technical experts may take on a spokesperson role related to their responsibilities.

When participating in social media either as an identified employee of Namco Solutions or concerning Namco Solutions business or topics, it is important that you state that you are expressing a personal opinion, or clearly state that you are affiliated with Namco Solutions. If you comment on any aspect of Namco Solutions business or issues, you must clearly include a disclaimer that the views are your own and not those of Namco Solutions.

You are legally responsible for your social media posts, unless the posting has been specifically approved by authorized management. You should remember that you may be subject to liability if your posts are found to be defamatory, harassing or in violation of any other applicable law.

6 REPORTING OF MISCONDUCT OF BUSINESS

Openness and discussion about ethical conduct is important to Namco Solutions. You are therefore encouraged to report concerns related to possible violations of the Code, as well as any other violations of law or company policy. Serious violations, such as cases of corruption and bribery, must be reported immediately. Reporting is a key part of ensuring that individual and systematic challenges to our business model and ethical requirements are handled in the appropriate manner.

In most cases, concerns about possible breaches of the Code should be reported directly to your line manager. Most cases can and should be handled locally in the line organization or be referred to the Managing Director.

You may also report your concerns directly to an external ombudsman. All contacts with the external ombudsmen will be treated anonymously at your request.

The ombudsmen report violations of the Code of Conduct directly to the Managing Director who will thoroughly investigate and clarify the reported violations with the support of the respective operational management and in close collaboration with the ombudsmen.

You are encouraged to report possible violations of the Code. If a concern is expressed in good faith relating to a possible violation of the Code to sources inside or designated by Namco Solutions. Namco Solutions will not permit retaliation in any form.

7 BREACHES OF THE CODE

Violations of the Code may result in disciplinary procedures, including termination of employment or contract, as well as potential legal proceedings.

You are required to cooperate in good faith with any internal investigations relating to this Code.

Should you have any questions relating to the content of this handbook or HSE issues in general please ask your line manager. A soft copy of this handbook is also available if requested.

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