



## ADEN Employee Code of Business Conduct

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The purpose of this Code is to define standards of behavior, which ADEN expects to exist in its employees' ways of conducting business (among its employees, between its employees and its suppliers, customers and franchisees). ADEN sees the interest of the company as irremediably linked with the interest of its employees, and every employee, as a member of ADEN, must realize the importance of not harming everyone's and the company's interest in his/her work and behavior and respect the code below.

### I. Use and Protection of Company Funds and Assets

- A) Each employee shall assure that Company funds and assets are used only for proper Company purposes and are protected from loss or damage. The terms "funds and assets" are all inclusive. They cover both tangible and intangible property. For example, buildings, equipment and supplies are covered, as are money, contracts, computer software, data held on computers, and the goodwill of the Company.
- B) With respect to computers, or computerized equipment and software, the following principles apply:
  - 1) The purchase of hardware and software must be made according to Company policy;
  - 2) All manufacturers and supplier's operating and security instructions must be strictly observed at all times;
  - 3) Employees who use computers or computerized equipment shall exercise reasonable care of both the hardware and software;
  - 4) Computer equipment, software or disks may not be removed from the work site for any purpose not directly connected to the employee's duties;
  - 5) Only software approved by the Company may be used on computers and then only in accordance with any licensing agreement or other rules applicable to its use.

### II. Protection of Confidential Information

- A) Each employee shall maintain the confidentiality of information belonging to the Company such as information related to its senior officers, employees, customers, suppliers, and competitors.
- B) Information shall not be disclosed to the media except in accordance with established Company procedures.
- C) Laws of the countries within which the Company does business protect personal data collected on individuals, which are stored on computers. A universal legal principle is that personal data must not be used for purposes other than those for which it was properly obtained, and must not be disclosed to persons who are not entitled to it. Consequently, in order to insure compliance with these laws the following principles apply:
  - 1) Any employee with access to personal data is expected to hold it in strict confidence;
  - 2) Any code or identifications which permits access to data held on computers may only be used by the person to whom it is issued;
  - 3) Employees using computers must ensure that access to data is protected by a password and shall change the password at frequent and regular intervals;
  - 4) Work on back up data disks must be secured both during and after work hours;
  - 5) Company business records held on computer systems must be treated as confidential records.
  - 6) Customers' information and all records held on the Customer Relationship Management system are confidential business information.
- D) Employees may disclose Company confidential information only to persons in the Company having the authority to receive such information. Confidential information may not be disclosed to persons outside the Company except in accordance with Company policy.

### III. Conflicts of Interest

- A) Employees shall not use confidential information belonging to the Company for personal gain.
- B) Employees shall avoid any outside interests that may improperly influence the decisions they make on behalf of the Company, such as personal or family investments in an enterprise that either does business with the Company or competes with the Company.

### IV. Dealings with Suppliers and Customers

- A) No employee shall either make or accept a commercial bribe in any form.
- B) No employee shall require of any person or firm that, as a condition of doing business with the Company, the person or firm must purchase the Company's goods or services.
- C) No employee shall accept an unsolicited gift from any person or firm doing or seeking to do business with the Company if the gift is of more than nominal value. In no event will any employee receiving a gift permit the donor to gain a business advantage because of the gift. A gift means anything of value.

### V. Dealings with Government Employees or Officials

Employees shall not offer anything of value either directly or indirectly to any government employee or official.

### VI. Protection of Company Records

- A) Employees shall neither falsify nor permit falsification of any Company record.
- B) Employees shall comply with the Company's record and retention policy.
- C) All payments from Company funds shall be properly recorded in Company records regardless of custom or practice in a particular country.



#### **VII. Competitive Practices**

- A) Employees shall scrupulously avoid communications with competitors about pricing, marketing, product development, or price fixation or anti-competition strategies.
- B) Employees shall not acquire information about a competitor by unlawful means.

#### **VIII. Political Activities and Contributions**

- C) Employees shall not represent nor create the impression that they are representing the Company in any political activity in which the employee engages.
- D) No employee shall cause the Company to make any political contribution in any manner that is contrary to law.

#### **IX. Safety, Health and Environment**

- A) Each employee shall assist in maintaining a safe and healthy workplace.
- B) Each employee shall assist in maintaining compliance with laws concerning the environment.
- C) Any equipment or supplies used by employees must be used in line with prescribed standards for safeguarding health and safety.

#### **X. Commitment to Harassment Free Workplace**

- A) Each employee shall assist in maintaining an atmosphere free of racial, sexual, or other forms of harassment.
- B) Each employee shall cooperate fully with management in maintaining a workplace free of employment discrimination on the basis of race, sex, religion, national origin, age, disability, or other bases prohibited by law.
- C) No employee shall retaliate against any other employee for exercising rights granted by law.

#### **XI. Commitment to Drug Free Workplace**

- A) No employee shall use any illegal drug or intoxicating beverage on the job.
- B) Employees shall not be intoxicated on the job.

*This code of conduct is a formal statement of Company policy intended for compliance by all employees, including managers as well as all non-supervisory employees. Discipline for violation of this code may include termination. The company has the right to revise the code of conduct and shall inform the employees of the said revision on a timely basis and the employees shall be responsible to adhere to the new code*

#### **ACKNOWLEDGMENT**

I have received, read, understood the 3 pages of this document and will comply with the ADEN Employee Code of Business Conduct. Unless disclosed below, I have no knowledge of any violation or potential violation of this policy. I understand that violation of the ADEN Employee Code of Business Conduct may result in disciplinary action, which may include termination.

Name (print): \_\_\_\_\_

Signature: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_