

It is the policy of ARCHE Advisors to set forth this Code of Ethics and Professional Conduct in order to reinforce a culture within the Company which builds trust and credibility, respect for the individual, and open, honest communication. This Code will serve as a minimum standard and guide to proper business conduct for all officers, employees and independent contractors of ARCHE Advisors.

1. DEFINITIONS

- 1.1. **Audit:** A systematic, independent and documented process used to determine whether activities and related results comply with applicable laws, regulations and standards as contained within the client specific guidelines.
- 1.2. **Auditor:** A person who performs audits, whether that person is an employee or independent contractor.
- 1.3. **Client:** Any individual or organization that commissions ARCHE Advisors to perform audits, research, training, or other projects.
- 1.4. **Company:** ARCHE Advisors.
- 1.5. **Employee:** Any individual employed by the Company in any capacity.
- 1.6. **Independent Contractor:** Any firm and/or individual that is not under the direct employment of the Company which is contracted to provide work on behalf of clients or internal administrative services.
- 1.7. **Onboarding:** Initial documentation, orientation, set up and training process by which new employees and independent contractors are added to the Company.
- 1.8. **Representatives:** Any ARCHE Advisors' owner, officer, manager, employee, or independent contractor, including those performing social compliance audits, other work as commissioned by clients, and/or the administrative support functions necessary to support that work.

2. INTEGRITY

Integrity is our chief asset. ARCHE Advisors will foster and promote a culture of integrity within the Company through internal interactions and in work performed on behalf of clients.

- 2.1. **Conflicts of interest and impartiality:** Representatives will be impartial and avoid conflicts of interest that, in fact or appearance, may create an incentive to report anything other than the true and accurate facts gathered during audits and other projects.
 - 2.1.1. Representatives will never use Company property or information gained through their relationship with ARCHE for personal gain.
 - 2.1.2. Auditors assigned to audit any organization with which they have had previous interest or affiliation will immediately disclose that fact to their manager. The manager will discuss the potential conflict with ARCHE leadership as needed to determine whether or not the audit must be reassigned.
- 2.2. **Confidentiality:** Representatives will maintain confidentiality with respect to information gathered while performing work on behalf of a client and will take all reasonable steps to prevent unauthorized access to information.
- 2.3. **Accuracy:** All services provided by a representative of ARCHE shall be performed in a careful, accurate, and comprehensible manner, with attention to details and according to client specific guidelines.
 - 2.3.1. Inadvertent errors or omissions will be corrected as soon as they are identified.
 - 2.3.2. Deliberately providing incorrect or misleading information is prohibited and grounds for immediate termination.
- 2.4. **Laws and Regulations:** ARCHE Advisors and its representatives will strictly comply with all laws, rules and regulations wherever we work.

- 2.5. **Fair Competition:** ARCHE Advisors and its representatives will behave fairly towards other market participants and treat its competition with respect.
 - 2.6. **Payments:** ARCHE Advisors or its representatives will not make any monetary payments to any governmental, political, business, labor organization, or individual. This does not prohibit payments to businesses for the provision of goods or services or the payment of government fees and charges authorized by legislation.
 - 2.7. **Gifts, meals, entertainment, favors and gratuities:**
 - 2.7.1. Auditors of the Company will not accept any gifts, meals, entertainment, favors, gratuities in the course of performing audits. The only exception to this standard may be water, tea or coffee generally available to any employee or visitor.
 - 2.8. **Anti-Corruption:** Loans, bribes and kickbacks of any kind are expressly forbidden. Suspected misconduct will be investigated thoroughly, and appropriate corrective action taken up to and including prosecution.
3. COMMITMENT TO RESPECT HUMAN RIGHTS
- 3.1. As a company, ARCHE Advisors is committed to respect human rights, both within the Company and on behalf of clients, according to the United Nations Guiding Principles on Business and Human Rights, 2011. In fact, human rights is the primary purpose for the Company's existence.
 - 3.1.1. ARCHE maintains policies and procedures in order to identify, prevent, mitigate and report impacts on human rights wherever we operate, and participate in corrective actions as delegated by clients.
 - 3.1.2. ARCHE welcomes submission of grievances as part of its improvement and risk management through our website link (ArcheAdvisors.com) and hotline +1 (435)574-1492. ARCHE will ensure each grievance is managed through our process with proper review, investigation, communication and closure.
 - 3.1.3. ARCHE Advisors is committed to working with like minded business partners to assure alignment of purpose with respect to supporting human rights.
 - 3.2. **Diversity and Inclusion:** Recruitment, wage policy, contracting, admittance to training programs, employee promotion policy, policies of employment or contract termination, and any other aspect of the employment or contractual relationship shall be based on the principle of equal treatment and opportunity, regardless of race, color, sex, religion, age, political affiliation, union membership, nationality, social origin, marital status, deficiencies or disabilities.
 - 3.3. **Safe Workplace:** ARCHE Advisors is committed to a safe, violence-free work environment. Discrimination, harassment (in all of its forms), and bullying will not be tolerated.
 - 3.3.1. Possession or use of illegal drugs while performing work for ARCHE Advisors is not permitted.
 - 3.3.2. Representatives shall not possess any weapon while performing work for ARCHE Advisors.
4. COMPANY ASSETS
- 4.1. **Intellectual Property:** Work product, Company specific procedures, client lists, assessor or talent lists, marketing materials and other resources developed expressly for and/or on behalf of ARCHE Advisors is the property of ARCHE Advisors and as such, is to be stored centrally in a company held location according to policy and is not to be shared outside the Company without the specific permission (written or verbal) of its owners.
 - 4.1.1. All work performed for or on behalf of ARCHE is copyrighted and should be marked accordingly.
 - 4.1.2. All representatives of ARCHE Advisors will likewise respect all copyright and trademark laws as they are understood.

- 4.1.3. Failure to respect confidentiality, copyright or requests to turn over work product that is the property of the Company may result in the termination of the business relationship.
 - 4.2. **Use of Company Resources:** Representatives will be mindful about their use of Company resources, including technology, and reimbursements.
 - 4.2.1. ARCHE email accounts are provided for business communication only and utilization should always reflect the values and ethics held by the Company.
 - 4.2.2. Expenses submitted for reimbursement should be accurate and according to OPE guidelines as stated within the expense form.
 - 4.3. **Purchasing:** All supplies, equipment, etc. purchased on behalf of the Company will be done in an ethical manner so as to maintain objectivity and to avoid any personal preferential treatment.
 - 4.4. **Corporate Record Keeping:** ARCHE Advisors will create, retain and dispose of Company records as part of our normal course of business in compliance with all ARCHE policies and guidelines, as well as all regulatory and legal requirements.
5. PROFESSIONAL CONDUCT
 - 5.1. **Dress:** A professional appearance is important when representatives of ARCHE Advisors work with the public. Representatives should be well groomed and dressed appropriately for the business and for their position.
 - 5.2. **Accountability:** Representatives of ARCHE will demonstrate the highest standards of integrity and professionalism while performing work for ARCHE Advisors. They will exhibit reliability, punctuality, preparation, expertise, honesty, accuracy and follow-through.
 - 5.3. **Demeanor:** Every representative of ARCHE will treat others with respect and dignity, including colleagues, clients and all others they come in contact during the course of performing audits.
 - 5.4. **Competition:** ARCHE Advisors is dedicated to ethical, fair and vigorous competition. We believe that our services are superior based on their merit. Representatives will not offer or solicit improper payments or gratuities in order to acquire work on behalf of ARCHE.
6. CODE ADMINISTRATION
 - 6.1. **Accountability:**
 - 6.1.1. ARCHE Advisors is responsible to assure all employees and independent contractors are knowledgeable about the values and standards set forth in this Code.
 - 6.1.2. Every ARCHE owner, manager, employee and independent contractor is responsible for knowing and adhering to the values and standards set forth in this Code.
 - 6.2. **Dissemination:**
 - 6.2.1. New Employees or Independent Contractors: This Code will be provided and reviewed at the time of onboarding as part of orientation. Representatives will sign an acknowledgement that they have received, read, understand and will abide by the Code.
 - 6.2.2. Updates: Updates will be distributed through monthly emails. If the changes are deemed to be substantial, signed acknowledgements will be required.
 - 6.3. **Reporting and Compliance:** Any ARCHE representative who is concerned whether the standards are being met or are aware of violations to this Code should contact their immediate supervisor or, alternatively, email HR@ARCHEAdvisors.com. Violations are cause for disciplinary action up to and including termination of employment or contract.
 - 6.4. **Review:** This Code will be reviewed annually.