



# Code of Conduct

October 15, 2021 (Ver A)



At Arturo, we work hard to raise the bar, holding values and behavior to a high standard. From employees to consultants to vendors, customers and business partners, we expect all within our network to carry forth our mission and vision.

## Our Vision and Purpose

We aspire to create the greatest understanding of physical places and spaces to enrich lives. We pursue this vision by empowering companies with unparalleled property insights to make the best decisions for their business and customers.



## Introduction

Arturo recognizes that a culture of openness, trust and integrity is essential to fostering and sustaining a vibrant and growing business. To that end, Arturo is committed to establishing a culture of ethics by working proactively to ensure that all employees are treated fairly and communication is open and honest.



Arturo is relying on all of its employees, directors and consultants to treat each other with mutual respect and work together as a team to create an environment where everyone feels supported and empowered to do what is right. This is an evolving challenge as we live in a world that is has become increasingly less private, where personal and work life regularly intersect. We expect our network to remain conscious of increased visibility, and to understand that you are an extension of Arturo, and that extension carries forth an expectation of behaviors and social responsibility.



## Scope

Every person working on behalf of Arturo – all staff, management, directors and consultants – must follow this Code of Conduct. We are all responsible for acting ethically as we conduct business for Arturo worldwide and for taking reasonable steps to prevent violations of this Code of Conduct as well as applicable laws and regulations.



# Your Responsibilities



## Be a great human.

To do great things, you must first be a great human. Treat others with respect. Be kind and understand the power of “please” and “thank you.” Be considerate. Take responsibility for your actions. Listen.



## **Act with integrity. Be honest and transparent**

We view honesty and integrity as the cornerstones to corporate and social responsibility. Share ideas openly and don't omit details critical to the success of others. As in the days of the handshake, mean what you say and follow through. Do not accept bribes or similar attempts of corrupt influence.

Learn more by reviewing our Standards of Conduct Policy, Antitrust and Unfair Competition Policy, Anti-Bribery and Anti-Corruption Policy, Export Control Policy and Conflict of Interest Policy.





## Operate with respect.

Act professionally. Harassment is prohibited. Inappropriate conduct includes comments, displays, actions or gestures based on another person's sex, color, race, religion, national origin, age, disability, sexual orientation, gender identity, and any other protected characteristic. Mistreatment of others is not a part of our culture and are not welcome—we do not tolerate hostility, toxicity or exclusion.

Keep your hands to yourself and don't make comments that can be misconstrued as unwanted sexual attention or advances. This is not who we are and will not be tolerated. If you see or hear something that makes you uncomfortable or is not right, say something.

Learn more by reviewing our Equal Employment Opportunity, Discrimination and Harassment Policy and Workplace Relationships Policy.

Proprietary and Confidential



## Act responsibly.

In a remote-first environment, social engagements and interactions are crucial to building and maintaining connections. If consuming alcohol, please do so responsibly, in moderation, and in accordance with applicable laws. Arturo does not condone the use of illegal drugs (defined by local or federal law) while working or engaging in Arturo events. Be safe. Follow the health and safety rules for your site. Violence and weapons are not permitted. If you see safety issues, say something.

Learn more by reviewing our [Drugs and Alcohol Policy](#), [Safety Policy](#), [Searches Policy](#), [Workplace Violence and Threats Policy](#) and [Weapons Policy](#).



## Be thoughtful.

Take time to listen, learn about what others do, and demonstrate understanding. Communicate kindly and constructively. Praise in front of groups. Be clear and concise so that your language can't be misconstrued.

Learn more by reviewing our Equal Employment Opportunity, Discrimination and Harassment Policy and Workplace Relationships Policy.

Proprietary and Confidential



## **Failure is accepted...and expected.**

Startups exist when someone has the courage to try something new. We not only value constructive feedback, we provide an avenue for the open-sharing of ideas and for the ability to fail with a soft space to land.



## Protect sensitive information.

We abide by a clear set of rules when it comes to protecting the information of our employees and business partners. Safeguard proprietary and confidential information. Maintain confidentiality. Use company technology and equipment for business purposes only.

Learn more by reviewing our Confidential Information Policy, Information Security/Sensitivity Policy, InfoSec Program – Information and Communication Policies, Maintenance of Company Property Policy, Computer, E-mail and Internet Use Policy.



## **Be social.**

Post appropriate content to social media. Be positive. Comply with our guidelines when discussing Arturo. Refer all media inquiries to Marketing.

Learn more by reviewing our Social Media Policy.



## Give back and help others.

“Your greatness is not what you have, it’s what you give.” We act on opportunities to contribute to the greater good through mentorship, volunteerism, fundraising, and outreach—bottom line, we get involved, we offer to help, and we mean it.



## We are committed to Diversity, Equity, Inclusion and Belonging.

We recognize individuality and the beauty that arises from expansive cultural representation, deliberately creating environments where all—employees, vendors, clients, business partners, and visitors--feel valued, accepted, and have their voices heard.

We are committed to building a culture as unique as the people, perspectives and passions it represents. We promise to never settle when it comes to diversity, equity and inclusion. As the world changes and evolves, we will always listen, learn and do better...for our teams, for our customers and for our communities.

Learn more by reviewing our Equal Employment Opportunity, Discrimination and Harassment Policy and Non-Retaliation Policy.





We believe good companies and good business can, and must be, synonymous.

We prioritize human rights and the safety of the environment. We do not do business with parties that abuse the rights of others or the environment around us.



## **We support professional development.**

We have developed living programs that foster growth and development—both personally and professionally and are committed to partnering with our employees on their individual journeys. Whether an Arturo employee, or an alum, we're with you for the long haul.



## **We ensure fair pay for equal work.**

We are committed to ensuring equitable compensation practices. Our people are our most important asset, and we pledge to compensate fairly, without regard to ability, age, ancestry, civil union, class, color, ethnicity, familial status, gender, gender identity, genetic information, marital status, military service or veterans status, national origin, pregnancy, race, religion, sex, sexual orientation, or other status.



## Additional Responsibilities of Managers

As a manager, you are also responsible for promoting compliance and preventing violations in the areas and people that you manage. Lead by example. Set high ethical standards for yourself and expect the same from your team. Report problems. Don't tolerate rule breakers. Intervene when appropriate.



# Reporting Concerns

We mean what we say--if you see inappropriate behavior or recognize a violation of our Code of Conduct, speak up. You can report it to your manager, any member of the People and Culture team, any member of the Leadership Team or to our EthicsHotline.

Our EthicsHotline is available 24 hours a day, 365 days a year in all countries in which we operate. You can report online or via telephone.

In the United States and in other countries where permitted by law, your report via the EthicsHotline can be anonymous. **Complaints and violations will be thoroughly investigated with a fair and timely resolution.**

<http://Arturo.ethicspoint.com>

**We do not tolerate retaliation against anyone who makes a good faith report of discrimination or harassment or participates in an investigation or protected activity. We are relying on you. And we can only achieve our goal of maintaining a culture of ethics if we all participate.**



## Where To Go For Help

We are here to help – to answer questions, provide clarifications or talk through an issue. Please reach out to Denise, VP of People and Culture, or Tracy, General Counsel.

[dferugio@arturo.ai](mailto:dferugio@arturo.ai)

[tshiflet@arturo.ai](mailto:tshiflet@arturo.ai)

[saysomething@arturo.ai](mailto:saysomething@arturo.ai)

## Feedback

As times change, so do the rules of engagement. We view the Arturo Code of Conduct as a living document. If you have feedback or a recommended adjustment, please contact [people@arturo.ai](mailto:people@arturo.ai).



## Referenced Policies

Anti-Bribery and Anti-Corruption Policy<sup>1</sup>  
Antitrust and Unfair Competition Policy<sup>1</sup>  
Computer, E-mail and Internet Use  
Policy<sup>2</sup>  
Confidential Information Policy<sup>2</sup>  
Conflict of Interest Policy<sup>2</sup>  
Drugs and Alcohol Policy<sup>2</sup>  
Equal Employment Opportunity,  
Discrimination and Harassment Policy<sup>2</sup>  
Export Control Policy<sup>1</sup>  
Information and Communication Policy<sup>3</sup>

Information Security/Sensitivity Policy<sup>3</sup>  
Standards of Conduct Policy<sup>2</sup>  
Maintenance of Company Property  
Policy<sup>2</sup>  
Non-Retaliation Policy<sup>2</sup>  
Safety Policy<sup>2</sup>  
Searches Policy<sup>2</sup>  
Social Media Policy<sup>2</sup>  
Weapons Policy<sup>2</sup>  
Workplace Relationships Policy<sup>2</sup>  
Workplace Violence and Threats  
Policy<sup>2</sup>

1. Confluence – Arturo Policies and Procedures, P&P: Legal
2. Employee Handbook
3. Tugboat Logic

