



FourNet[®]

Corporate Code Of Conduct V1.2

RESTRICTED

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Document Information

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Authorisation

Document Prepared by: Sarah-Jane Heber-Hall
Head of Compliance

Verified and Authorised by:



Richard Pennington
Chief Executive Officer (CEO)

1. Overview

FourNet Technologies Ltd. lives by a code of conduct that expects the best from its people. We believe that what we stand for matters. We believe in doing what is right. We believe in doing what we say we will do. In a company filled with people who do what they say they will do, we can keep the promises we make to our customers, our investors, and each other.

Our reputation is a priceless asset. Safeguarding our reputation requires each of us to make sound judgments every day. Consistently operating by the highest standards of business conduct in all our relationships generates trust in us as individuals and as a company.

The FourNet senior leadership team has adopted the following statement to articulate our code of conduct, which from the founding of the business, has governed the behavior of our corporate community--officers, directors, and salaried employees.

2. Ownership

This process is owned by the Senior Leadership Team and administered by the FourNet Head of Compliance. The departmental structure, together with roles and responsibilities can be found in Section 5.3 of the Quality Manual.

Additionally, please refer to Section 9 of the Quality Manual for the methods used to monitor, control, and develop the processes.

3. Policy Objectives

All employees and directors of the company are responsible to:

Conduct themselves and FourNet's business with honesty and integrity, avoiding both actual and apparent conflicts of personal or professional interests.

Promote ethical behaviour in the work environment as a responsible partner among peers.

Comply with laws, rules and regulations of central and local governments, and other appropriate private and public regulatory agencies that govern our business. While it is difficult to know the details of these laws, it is important to know enough to determine when to seek advice from peers or other appropriate management personnel.

Promptly report dishonest, unethical or illegal activities by other employees to your line manager or the Board of Directors, anonymously if preferred. Please refer to 002_68 Whistleblowing Policy for further details.

Provide full, fair, accurate, timely and understandable reporting and disclosure in documents filed with or submitted to Companies House, Inland Revenue, and in any other public communication.

Responsibly use and control all tangible and intangible assets and resources employed or entrusted from the company. We are obliged to respect the confidentiality of information acquired in the course of our work.

Comply with this Code of Conduct knowing that failure to do so may result in disciplinary action up to and including termination of employment.

4. Policy Statement

This policy applies to all FourNet's interested parties.

FourNet are committed to operating a professional quality led business, with our main focus being to provide an exceptional service to all interested parties, and especially our Customers.

The FourNet SLT commit its full support to the policy and empowers its employees to undertake any steps required to meet its objectives. The Business has additional responsibilities for ensuring that the principles of the policy are met and that it is monitored and developed to ensure that appropriate and robust controls are in place to achieve the objectives set out, namely:

To meet the requirements of all applicable legislation and regulations;

To ensure staff are aware of the potential impacts of their activities that will bring the Business into legal or reputational disrepute and to share the ethos of a correct and ethical way of working;

Ensure this policy is communicated to all staff, contractors, and suppliers;

Continually monitoring our environmental and social impacts as part of our working culture and consistently improving our performance;

Provide instruction and training to all employees to ensure awareness of the Corporate Code Of Conduct.

5. Waiver or Amendments To This Policy

Any waiver of this policy must be given in writing. Waivers may be requested through the Senior Leadership Team. Waivers respecting financial officers, executive officers, and directors may be approved only by the board of directors and will be promptly disclosed. Amendments also will be promptly disclosed.

6. Reporting And Enforcements

If an employee suspects possible violation of the Code of Conduct, FourNet policies or laws, including those pertaining to government contracting, such employee has the responsibility to contact his or her Line Manager or Board of Directors, immediately. If the employee wishes to remain anonymous, they should do this in writing, using a word processing device or equivalent. Such reporting will be handled confidentially. Please refer to 002_68 Whistleblowing Policy for further information.

Regardless of how any suspected breach is reported, there will be no form of reprisal for doing so. FourNet will investigate fully all matters related to alleged breaches and take appropriate action in accordance with the 002_26 Equality, Diversity and Inclusion Policy and other appropriate policies.

7. Communicating FourNet's Policies

Relevant training, bulletins, education materials, policies, procedures and processes are provided on an ongoing basis to all employees to ensure they are full aware of their responsibilities, and are kept up-to-date of any new requirements. These are communicated in a number of ways, including, but not limited to:

Induction sessions;

PDR meetings;

Company meetings;

Atlas/Citation portal; and

Regular company bulletins via Microsoft Teams.

8. Review and Ownership of This Policy

This policy will be reviewed and amended as required, and at least annually by the Head of Compliance. This document is managed by the ISO review process and, as such any revisions will be authorised at Board Level prior to general release.

This policy document is ISO controlled and as such, the source document will be stored in the secure area of the FourNet ISO SharePoint and a PDF version in FourNet Open Access ISO Documents PDFs folder, sub-folder 002 Policies.