



Corporate Code of Conduct V1.4

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Document Information

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Authorisation

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Chief Executive Officer

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, and we believe in doing what we say we will do. In a company imbued with this culture, 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 above statement to articulate our code of conduct, which from the founding of the business, has governed the behaviour of our corporate community—officers, directors, and salaried employees.

We also extend these expectations to our Supply chain, and with this in mind, have put in place a similar Supplier Code of Conduct that reflects this code of practice.

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. Scope of the FourNet Corporate Code of Practice

For the purposes of this code of practice, Employees, contractors, volunteers and any associate of FourNet who may represent the Business, are expected to comply with our standards set forth herein.

4. Laws and Regulations

For us, compliance with all applicable laws, regulations and our chosen standards is a matter of course. We also expect this from anyone we choose to do business with or represent. This is the only way to ensure a trust-based and long-term relationship.

We will ensure that we operate appropriately, regardless of the specific legislation of the UK, in any countries, business sectors or markets where other regulations or accepted business practices may exist, and abide by these standards, rules and regulations.

We will also follow up on all reports of violations of applicable laws. Violations will be stopped, and appropriate action taken.

We will also comply with foreign trade regulations. Appropriate measures must be taken to ensure that transactions with third parties do not violate applicable economic embargoes or regulations on trade, import and export controls or to combat the financing of terrorism.

5. Underage Labour

FourNet do not tolerate child labour as defined by ILO convention 138 or ILO Convention 182 and applicable national laws,

We will also ensure that our Suppliers and Business Partners follow suit, to ensure that no underage labour has been used in the production or distribution of goods and services to FourNet. A child is any person under the minimum employment age according to the laws of the country where the product (or parts of) or services are sourced from, or in the absence of law under the minimum age for completed mandatory education.

Accordingly, children under the employment age of 18 may not be employed in any of the worst forms of child labour. This includes any work which, by its nature or the circumstances under which it is performed, is likely to be harmful to the health, safety, or morals of children.

6. Forced Labour

FourNet will not use or tolerate any form of slavery, servitude, indentured, bonded, involuntary prison, military or compulsory labour or any form of human trafficking, or any other form of forced labour set forth by ILO Convention No 29. All work must be conducted voluntarily and without threat of any penalty or sanctions.

No employee government issued identification, passports or work permits will be retained by any representative of FourNet as a condition of employment.

Workers' rights to leave the workplace after our shift or to terminate our employment after reasonable notice and receive owed salary is expected and must be recognised by anyone who we work with. This applies to local or migrant employees.

FourNet cannot tolerate any form of slavery or practices similar to slavery, serfdom or other forms of domination or oppression, e.g. through extreme economic or sexual exploitation and humiliation in the environment of the place of work.

FourNet and its representatives will report any incidents of slavery or human trafficking found in its business or supply chain.

7. Freedom of Association

FourNet respect the rights of workers to associate or not to associate with any group, as permitted by and in accordance with all applicable local and national laws and freedom of association and collective bargaining. FourNet and its representatives shall not interfere with or discriminate against workers choosing to belong to them.

Where the right to freedom of association and collective bargaining is restricted under national law, we expect any fourNet representative to facilitate, not hinder, alternative means of independent and free association and bargaining.

8. Discrimination

FourNet offer an inclusive and diverse work environment, that is encouraged, with equal opportunities for all of our workers.

All employees are treated fairly and not discriminated against in any form of employment, or employment applications, based on the grounds of national or social origin, race, health status, gender, pregnancy or parenthood, marital status, age, disability, religion or belief, political opinion,

sexual orientation or gender identity or any other grounds covered by a discrimination prohibition, during any recruitment or employment activities.

FourNet commit to treating our employees with dignity and respect, free of any harassment or threat of harassment. Any forms or threats of harassment, either physical, mental, sexual or verbal, are prohibited and not tolerated. Abuse of power, intimidation, antisemitism and religious intolerance are also prohibited.

9. Fair Working Conditions

FourNet respect and comply with regulations to ensure that fair working conditions are in place, and we allow our employees to raise issues openly and without fear of reprisals.

Our employees and associated contractors are paid wages and benefits above the legal requirements and what is deemed a fair. We ensure that we pay our employees and contractors wages that are above the UK cost of living rates and will never make unauthorised deductions to their wages.

We have in place safeguards to ensure that our employees will never have to tolerate intimidation, and retaliation attempts if they should ever have the need to report actual or suspected misconduct in good faith. FourNet give our employees the opportunity to report potential compliance violations confidentially too, in line with our right to the freedom of expression.

10. Working hours

FourNet ensures that our employees working hours comply with national laws and standards and do not expect workers to work (including overtime) in excess of hours set out in relevant working time legislation or other national legal limits, unless an opt-out has been chosen by the employee with appropriate supporting written evidence in place that can be evidenced and audited, on request. FourNet have also put in place education, information relay and procedures to prevent excessive physical and mental fatigue of employees, by observing appropriate measures regarding working hours and rest breaks.

11. Healthy, occupational safety and well-being

FourNet provide safe and clean conditions for workers and contractors. Clear procedures are in place to ensure regulated occupational health, safety and wellbeing standards are adhered to and that employees are adequately trained and instructed regarding protective measures. We conduct appropriate risk assessments to ensure that a consistently safe environment is in place and have our ISO 45001 Health and Safety Management System in place that helps us measure and monitor our health and safety objectives of the Business, with our employees in mind. We also have a Health & Safety Workers Committee that help us be aware of and manage any potential issues or concerns around Occupational Health and Safety.

12. Environment

FourNet have our ISO 14001 Environmental Management System in place that helps us measure and monitor our environmental objectives, that includes our Environmental Policy and other processes and procedures that help us manage and reduce our impact on the environment. We also have in place a Carbon Reduction Plan that is published Annually, to obtain our Net Zero commitments by 2050.

13. Business integrity

FourNet will not engage in, or allow by inaction, any form of bribery or corruption, whether by public officials or in business dealings, will not make contributions, as invitations or in connection with advertising measures, donations and sponsoring, only to the extent permitted by law, or undertake any action that contravenes FourNet's Anti-Bribery and Corruption policy.

We expect that our business associates and supply chain also have in place systems to prevent, detect, investigate, and respond to allegations or incidents of corruption and bribery.

FourNet conduct our business, recordkeeping, and financial reporting in an orderly and transparent manner. Business transactions, assets and liabilities are recorded and documented according to legal requirements. No false or misleading entries may be made within any of our business operations. No false or misleading entries may be made on documents that are relevant for financial accounting. Any form of balance sheet manipulation is prohibited.

It is prohibited by law to use insider information when trading in securities or other tradable financial instruments and disclosing insider information to third parties for such purposes. Insider information is information not publicly available, and which could significantly influence the price of securities or similar financial instruments or our market. Examples of such circumstances may include, but are not limited to profit increases and decreases, sizable orders, acquisitions and mergers, significant new products or solutions or changes in management structures.

14. Conflicts of interest

FourNet will disclose potential or actual conflicts of interest to all affected parties, and resolve them as quickly as possible, and we expect any FourNet associate to do the same.

FourNet also have in place processes and procedures to protect confidential information from unauthorised disclosure and misuse and protect FourNet's reputation in public statements.

Confidential information is non-public information intended only for restricted group or persons.

FourNet would never discuss confidential information in public, via social media or disclose information about the company or its customers, or associates to third parties without authorisation. Any breach of these requirements constitutes a breach of confidentiality obligations and may constitute antitrust violations or breach any confidentiality agreements in place.

15. Protection of Business Assets

FourNet or their representatives will not engage in any form of fraud, or other offences that are damaging to the assets (e.g. embezzlement, theft, misappropriation, tax evasion or money laundering) regardless of whether FourNet's corporate assets or the assets of third parties are damaged as a result.

FourNet and their representatives will respect and protect intellectual property of all kinds. Intellectual property is defined as all products of intellectual work, regardless of our commercial value. These include, but are not limited to, literary and journalistic works, music, films, television programs, graphic works as well as software and hardware.

Intellectual property is protected by law (e.g. by copyright, trademark or design or patent laws) as trade secrets or expertise.

Protected intellectual property infringements include, for example, the performance, distribution, or exhibition of copyrighted works without appropriate permission and the unauthorised reproduction or distribution of copies of intellectual property, whether in physical or digital form.

FourNet will comply with applicable laws and regulations when personal data and information are collected, stored, processed or transferred.

When collecting, storing, processing or transmitting personal data (e.g. name, address, telephone number, date of birth, health information) of employees, customers or other third parties, we take the utmost care and observe strict confidentiality as well as compliance with applicable laws and regulations.

Data is processed and IT systems used as part of daily operational processes and procedures. All employees and associated partners or contractors who may have access to passwords, processes, approved technologies and licensed software are expected to follow our appropriate safeguards and training that has taken place, to protect and preserve the confidentiality, integrity and availability of these systems, at all times.

FourNet also have in place an ISO 27001 Information Security Management System that helps us to meet our Information Security objectives.

16. Fair Competition

FourNet comply with applicable antitrust and competition laws and commit to fair and unimpaired competition. We refrain from restrictive agreements with competitors, suppliers, distributors or trading companies and customers, as well as from practices that restrict competition. These include, for example price-fixing agreements with competitors, sharing customers or sales territories between competitors, anti-competitive boycotts and the unlawful exchange of competition-sensitive information with competitors as well as other unfair competition methods.

We have in place systems to prevent, detect, investigate, and respond to allegations or incidents of or relating to restrictive practices. We also educate and inform our employees about fair competition.

17. Discipline and grievances

FourNet have in place a grievance mechanism Policy for employees to anonymously raise workplace concerns. Our employees are informed clearly how they can inform us of a grievance issues anonymously and have set out ways to use this mechanism.

Disciplinary procedures are covered within our Staff Handbook and managed by our People Operations team. We also work with Citation, a leading Employment Law company, to ensure that we have the correct procedures in place and conduct any grievance in the correct manner.

18. Compliance with Code

FourNet expect our employees and representatives to demonstrate compliance with this Code of Practice.

19. Reporting concerns

In relation to 2. to 13. above employees and FourNet representatives are invited to report any area of concern to us. Please refer to our Whistleblowing policy for further information and advice on how to report concerns anonymously.

20. Waiver or Amendments to this Code of Practice

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.

21. Reporting and Enforcements

If an employee suspects possible violation of the Code of Practice, 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.

22. Communicating FourNet's Policies and Codes of Practice

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

Induction sessions;

PDR meetings;

Company meetings;

Atlas/Citation portal; and

Regular company bulletins via Microsoft Teams.

23. Review

This Code of Practice 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.

Signed on behalf of 4net Technologies Ltd T/A FourNet

Richard Pennington

A handwritten signature in black ink, appearing to read 'Richard Pennington'.

Chief Executive Officer

Date: 24th September 2024