



MicroSystem Support

COMPANY CODE OF CONDUCT

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The purpose of this document is to summarise MSS's Values and processes which are fully documented in MSS's Quality Documents (Processes and Procedures).

Table of Contents

Introduction	3
Our Vision.....	4
Core Values.....	4
Compliance with Laws & Regulations.....	5
Code of Conduct Responsibilities.....	5
RESPONSIBILITIES OF EMPLOYEES:	5
RESPONSIBILITIES OF LEADERS:	5
Workplace Civility:	6
Diversity & Non-Harassment	7
SEXUAL HARRASSMENT	8
REPORTING DISCRIMINATION OR HARRASSMENT	8
No Retaliation.....	8
Respecting & Valuing Human Rights.....	8
Ensuring a Safe & Healthy Workplace.....	9
A Drug & Alcohol Free Workplace	10
Retaining Records Appropriately	11
Anti-trust & Fair Dealing.....	12
Preventing Fraud, Bribery & Corruption	12
Using Company Assets Responsibly	12
Guaranteeing Quality Services.....	13
Gifts, Meals & Entertainment	14
Information Security	15
Social Media & Sharing About MSS.....	16
Demonstrating Corporate Citizenship: Social & Environmental Responsibility	18
SOCIAL RESPONSIBILITY	18
ENVIRONMENTAL RESPONSIBILITY	18
Reporting Non-Compliant Behavior (Whistleblowing Procedures).....	20

Introduction

Microsystem Support Ltd (MSS) is committed to operating our company with integrity and high ethical standards. We believe these to be critical in our efforts to uphold important standards, practices, laws and regulations. We share with our employees, customers and stakeholders the primary tools and initiatives we use to ensure that integrity is maintained at all times throughout our entire organization.

The Core Values that we hold dear as a company are –

Trustworthy • Empathetic • Dedicated • Resourceful • Innovative

These Core Values are the foundation for our Code of Conduct. The Code is our framework, the way we have articulated what we believe to be the essential guidelines for a company that only operates with integrity.

All employees are responsible for learning, following and promoting the Code of Conduct at MSS. In order to ensure that integrity is maintained at each and every touch point, we train our employees to be ambassadors of our compliance and ethics standards. We also extend and apply the key principles of our Code to our suppliers and vendors.

Our Code is paramount to how we conduct business and violations will not be tolerated. Each employee has an obligation to observe and follow the company's policies and to maintain proper standards of conduct at all times. In addition to the extensive and mandatory training, Management is always available to support and advise employees on carrying out ethical behaviour.

Our Vision

MSS is committed to being an innovative leader that defines superior business practices through our entire resource channel, achieving consistent and professional service delivery with a collaborative approach and a focus on our customers' best interests.

Core Values

TRUSTWORTHY

Our relationships are built on delivering what we promise.

EMPATHETIC

We listen, understand and are committed to meeting our customers' needs.

DEDICATED

We provide a personal commitment and availability to our family of customers and partners.

RESOURCEFUL

We have the experience to resolve our customers' complicated challenges creatively and efficiently.

INNOVATIVE

We deliver innovative results that solve our customers' challenges to improve their business.

COMMUNICATIVE

We pride ourselves in open and frequent communication with our customers and suppliers.

Compliance with Laws & Regulations

MSS and all our employees are bound by the law, and therefore compliance with all applicable laws and regulations must never be sacrificed. MSS also enforces its own internal rules, procedures and regulations detailed within MSS Quality Manual that is audited and ISO9001 compliant. These rules and regulations must also be adhered to by all employees.

Code of Conduct Responsibilities

RESPONSIBILITIES OF EMPLOYEES:

- Honour and promote a culture of ethical behaviour.
- Understand and abide by the policies, rules, regulations and guidelines contained in the MSS Code of Conduct and all other MSS processes and policies.
- Consult designated MSS resources for advice, answers to questions, concerns about individuals, and any other issues related to the Code.
- Report any observed actions or suspicious behaviour to the Managing Director.
- Comply with investigative procedures and processes regarding reported misconducts/violations.

RESPONSIBILITIES OF LEADERS:

- Act as a role model for MSS employees with respect to ethical behaviour and compliance with MSS Code of Conduct and all other MSS processes and policies.
- Inspire and foster a culture of trust, compliance and integrity, in particular connecting how this behaviour is grounded in MSS Vision and Core Values
- Maintain a work environment that supports collaboration and thinking from the whole, allowing employees to raise questions and concerns freely and without fear of retaliation.
- Communicate and demonstrate a NO TOLERANCE stand against unethical behaviour.
- Coach employees in addressing concerns and behaviours regarding unethical behaviour.
- Lead and enforce compliance and ethics training programs and initiatives.

Workplace Civility: Treat People with Respect

Employees at all levels of the business are expected to treat each other with respect. The success of the business depends on cooperation and teamwork among all employees. Employees are expected to refrain conduct that may be harmful to others. Such behaviour can include oral or written statements, gestures or expressions that communicate a direct or indirect threat of physical harm. Conduct that threatens, intimidates, or coerces another employee, a customer or business partner at any time, including off-duty periods, will not be tolerated.

Employees SHOULD NOT IGNORE violent, threatening, harassing, intimidating or other disruptive behaviour. If an employee sees or hear a commotion or disturbance near their work area, they are strongly urged to avoid trying to intercede or see what is happening. If an employee observes or experiences such behaviour by anyone on the premises – whether he or she is an employee or not – they are asked to report it immediately to a supervisor or manager.

Diversity & Non-Harassment

MSS is committed to fostering, cultivating and preserving a culture of diversity and inclusion. Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company's achievement as well.

MSS is an Equal Opportunity Employer. Minority persons and persons with disabilities are encouraged to apply for the positions we offer. Furthermore, we embrace and encourage our employees' differences in age, colour, disability, ethnicity, family or marital status, sex, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status and other characteristics that make our employees unique. This allows for us to incorporate diverse thinking, which ultimately allows us to be creative in meeting the needs of our customers. Every employee at MSS should be able to freely contribute to our company's success.

MSS' diversity initiatives are applicable – but not limited – to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; and the ongoing development of a work environment built on the premise of gender and diversity equity that encourages and enforces:

- Respectful communication and cooperation between all employees
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
- Work/life balance by providing flexibility where possible to accommodate employees' varying needs.
- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for diversity.

All employees of MSS have a responsibility to always treat others with dignity and respect. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events. Any employee found to have exhibited any inappropriate conduct or behaviour against others.

SEXUAL HARRASSMENT

We are committed to providing a work environment where all individuals are treated with respect and dignity, free from prohibited discrimination and a hostile work environment. This includes sexual harassment.

REPORTING DISCRIMINATION OR HARRASSMENT

MSS takes all allegations of discrimination, including sexual harassment, seriously and will investigate such complaints promptly. Violations of this zero-tolerance policy will not be permitted and may result in disciplinary action, up to and including discharge. Any employee who feels that (s)he is a target of such harassment should immediately report the matter to the any other member of management. MSS will investigate all such reports as confidentially as possible. Any manager or supervisor who receives a report of discrimination, including a complaint about sexual harassment, must report the complaint to the management as soon as possible. We expect all employees to act responsibly in making these reports as false accusations can have serious effects on innocent persons.

No Retaliation

Retaliation against a person who in good faith has complained or provided any information about a code violation by any individual is strictly prohibited. We take all reports of this nature seriously and will investigate complaints promptly. Violations of this zero-tolerance policy will not be permitted and may result in disciplinary action, up to and including discharge. An employee will not be discharged, demoted, suspended or harassed in any way as a result of reporting violations of the Code. Any employee who feels that (s)he is a target of such behaviour should immediately report the matter. We take all allegations of retaliation seriously.

Respecting & Valuing Human Rights

MSS upholds a strong commitment to respect the protection of human rights. We have embedded this commitment throughout our entire Code, as manifested in this document. Additionally, our respect for the protection of human rights also means the condemnation and prohibition of human trafficking/Slavery and/or exploitation. This prohibition includes the engagement in any trafficking-related activities prohibited by law or regulation. We do not tolerate forced, compulsory or child labour of any kind in our operations. MSS also pursues

sustainability and environmental protection initiatives, including reduction of waste and energy use, utilization of renewable energy and water conservation.

MSS' Code of Conduct places great importance on the protection of human rights, and we extend our efforts to include our vendors and suppliers. Our partners must operate in accordance with our stand on human rights and anti-slavery, failure to comply with these standards could result in termination of our relationship with them.

All MSS staff are trained in anti-slavery awareness which is conducted annually and part of individual training programs. Additionally, MSS partners with Anti-Slavery charities to promote awareness and ensure company policies are compliant.

Ensuring a Safe & Healthy Workplace

At MSS, it is imperative for us to promote the good health and well-being of every worker and to comply with all UK Government and safety regulations and requirements. The safety and health of our employees continues to be the first consideration in the operation of this business. Our commitment to safety embraces the following beliefs:

- MSS strives to ensure that safety and health awareness and good practice are integral parts of every operation and service. Safety is every employee's responsibility at all levels.
- MSS complies with all environmental health and safety laws. Our employer safety and health practices subscribe to approved safety program standards.
- MSS requires employees and management alike to be constantly aware of conditions in all work areas and job sites that can produce injuries. No employee is required to work at a job or on a customer site that he or she believes to be not safe or healthful.
- The cooperation of employees in detecting hazards and, in turn, controlling them is a job requirement. Employees should inform their supervisors immediately of any potentially unsafe or unhealthy situation that is beyond their ability or authority to correct.
- The personal safety and health of each employee is of primary importance. The prevention of on-the-job injuries and illnesses is of such consequence that it will be given precedence over operating timescales whenever necessary.
- Our objective is a safety and health program that will limit the number of injuries and illnesses to an absolute minimum. Our ideal goal is zero accidents and injuries.

Regular Health and Safety Training is undertaken annually by employees and recorded in individual training records.

MSS is part of SafeContractor scheme, ensuring that Health and Safety compliance is regularly audited and certified annually.

A Drug & Alcohol-Free Workplace

MSS is committed to providing a safe, healthy and productive work environment. To meet this objective, as well as our obligations under applicable laws, we have a drug-free workplace policy and program that provides MSS with reasonable measures to ensure that an employee drug or alcohol problem does not jeopardize the successful operation of our business, or otherwise negatively affect MSS, our employees, or the general public.

While it is not MSS's intention to intrude into the private lives of its employees, our employees are expected to perform their work responsibilities free from the influence of alcohol and drugs that can impair their judgment and/or compromise the safety and productivity of themselves or others.

Retaining Records Appropriately

Our Policy serves as a mandatory guideline for the creation, acceptance, maintenance, use, retention and disposition of documents and files regardless of media. It is critically important that all MSS employees understand and comply with the policy and as a result, establish protocols for compliance with these guidelines.

Records and information management at MSS requires considerable organization and coordination based on appropriate and adequate record keeping; confidentiality; security and compliance with legislation, client directives and Company Policies – regardless of media.

On the performance side of the business, the administrative records of MSS and affiliates are valuable assets and a key resource to effective operation and accountability. MSS' records are its corporate memory. They furnish evidence of actions and decisions and represent a vital

asset to support daily client service functions and business operations. They also support sound decision-making and consistent and equitable service deliverability. MSS has a financial, legal and historical obligation to itself and a responsibility to its clients to see that records are received, created, managed, protected, secured, tracked, retained and disposed of in an appropriate and efficient manner.

In order to serve and conduct business with its clients and to support the normal operations of its organizational business actions, MSS creates, receives, maintains, secures, stores and disposes of records in accordance with our guidelines:

- MSS declares ownership of all records created on its behalf to support the normal course of its business actions.
- MSS will secure and protect the privacy of client information regardless of media, through use of passwords, encryption and, when appropriate, the establishment of ethical walls
- MSS will create, maintain or destroy eligible records in a manner appropriate to the record media and format.
- MSS will retain records for a period consistent with the MSS retention schedule and Customer requirements.

Anti-trust & Fair Dealing

At MSS, we value the importance of free competition and compete fairly and legally. We conduct our business according to all appropriate laws and regulations concerning fair dealing, antitrust and competition. We also expect our suppliers, vendors and other business partners to act in accordance with all applicable laws and regulations relating to fair dealing, antitrust and competition.

Preventing Fraud, Bribery & Corruption

Because we are uncompromising in our resolve to operate with integrity, MSS counts on all our employees and partners to uphold and honour our reputation in the marketplace. We are compliant with all applicable laws, regulations and conventions relating to fraud, bribery and corruption, and violations are not tolerated. If we find credible evidence that an employee has committed fraud or has participated in any kind of bribery or corruption, we will take appropriate action. Therefore, it is imperative that all employees refrain from participating – directly or indirectly – in any kind of behaviour that could give rise to suspicion of fraud, bribery or corruption.

Using Company Assets Responsibly

At MSS, we provide various kinds of equipment to our employees to use in the pursuit of effectively serving our customers. Equipment such as laptops should only be used for business purposes.

All assets should be handled with proper care and protected against theft, loss, damage and misuse. No property or equipment may be removed from the premises without the proper authorization of management. If property or equipment is stolen, lost or damaged, this must be reported to the department manager immediately.

Guaranteeing Quality Services

For MSS, the quality of services we provide to our customers is imperative for maintaining our success and ensuring sustainable, profitable growth. Guaranteeing quality means meeting our customers' needs and delivering with excellence – with the quality they expect, at the time they expect and at the cost they expect. At MSS, we count on our employees to take personal responsibility for ensuring that quality standards are met, and for making this a priority as part of maintaining our reputation as a leader in the industry. We are all accountable for delivering with excellence, and for doing this in the most ethical way possible.

Gifts, Meals & Entertainment

MSS asks our suppliers and vendors to use discernment and moderation when offering gifts or entertainment to our employees. We will not accept any item, treatment or form of service that might impact the decisions we make or the way we conduct business. This applies to any individual or organization that we directly or indirectly we interact with.

Examples include, but are not limited to:

- Money or gift certificates
- Loans of any value
- Objects of value
- Special/exclusive treatment; free services or discounts (not available to the public); favours
- Gratuities
- Other items or services of value

MSS employees may accept gifts or promotional items of nominal value (e.g., coasters, pens) as long as acceptance of these items will not influence their business decisions. MSS employees may never solicit gifts or business courtesies. Any meals or hospitality must be recorded and authorized by Management.

MSS employees are not permitted to influence others by offering gifts, special treatment or service. Hospitality and meals provided to customers must be recorded and authorized by Management.

Meals and entertainment with MSS associates should be limited to what is reasonable and appropriate for the ethical conduct of business.

Information Security

Protecting MSS's information is the responsibility of every employee, and everyone shares a common interest in making sure it is not improperly or accidentally disclosed. Employees are not permitted to discuss the company's confidential business with anyone who does not work for MSS. Company documents, customer and vendor lists, etc. are the property of MSS and must not be disclosed. Employees must follow all applicable security guidelines and policies to ensure that unauthorized use or disclosure of sensitive company information does not occur. Employees may never use the propriety information of a third party without authorization.

Third-party confidential information should be treated with the same care as MSS' confidential information. Violation of any part of this policy will result in disciplinary action, up to and including discharge. If a person's employment terminates for any reason, they must surrender all such documents and information in their possession. Any confidential business information is the property of MSS. Any unauthorized use of such information will result in legal action.

All information, including the contents of email, telephone, text, chat and web-conference communications, and any data, entered, stored, transmitted and processed by or through MSS- owned or leased information systems and networks is owned exclusively by MSS and is therefore propriety.

Most MSS propriety information is confidential and may be subject to copyright or other intellectual property or legal protections. Examples include procedures related to MSS services, systems, and internal processes; business and marketing plans and strategies; pricing and other financial data; customer and supplier contacts; account and order information; and personnel information about work activities, assignments, job performance, and organizational changes.

Sharing or discussing this information, or referring to it in any forum, without authorization or business necessity is strictly prohibited.

All MSS employees are also responsible for protecting the personal information of their fellow employees, customers, suppliers, vendors and all parties with which we conduct business.

Employees should understand and comply with all laws, rules and regulations when working with the personal information of others. They must take special care to avoid unintentional disclosure of people's personal information. This includes how the information is gathered,

stored, shared, used and deleted. Information that is obtained as a result of a credit report or contains sensitive information such as social security numbers or medical information must be stored in a locked container or secure area. When no longer needed, this information must be destroyed according to applicable legal requirements.

If an MSS employee should become aware that someone has been given unauthorized access to information, they should report to Managing Director immediately. Any person who purposely discloses or misuses personal information is subject to disciplinary action, which could include discharge; they may also face civil and criminal penalties.

Employees should have no expectation of privacy when utilising company email and web applications, wireless devices and MSS computers to access the Internet. The company monitors this activity and continually employs new technologies and data security measures to protect company assets and ensure systems integrity.

Social Media & Sharing About MSS

MSS selectively utilizes social media to advance business purposes, support our marketing efforts, solicit job candidate referrals, improve customer relations, and promote employee engagement. All such activity requires approval from the Managing Director.

MSS respects every worker's right to privacy as well as free expression, The company will neither prohibit nor endorse an employee's personal participation in social media, as long as such activities do not conflict with this policy or MSS business interests. Nevertheless, clear guidelines are required to practice responsible use of social media in all circumstances. These include:

- Caution is strongly advised when communicating a time-stamped permanent record of personal comments online, which can often be distributed with or without the author's knowledge. An employee's own privacy and reputation are at stake when engaging in social media.
- Unauthorized communication among MSS employees, customers, partners and others on any matter related to MSS proprietary information as defined in this policy is strictly prohibited.
- Employees who make it known that they work at MSS and who blog or otherwise publish in both private and public forums must indicate that their personal views do not reflect the position or opinions of MSS.
- All employees must know and follow all MSS employment policies concerning ethical

conduct and compliance to workplace civility, diversity and non-harassment, both inside and outside of work at all times and in any and all communications.

- Employees should protect and enhance the value of the MSS brand: Present MSS in a positive light and avoid making derogatory comments about MSS, our services, leadership, employees and systems.
- The use of the MSS logo, company documents, pictures and videos, and all other proprietary information in personal online forums is prohibited.
- MSS employees must avoid posting or discussing anything related to the services that clients pay MSS to provide.
- Any interaction, client comments, or customer or prospect information, and competitive intelligence gleaned through online activity or correspondence, that has potential to impact MSS business dealings or employee matters must be immediately reported.

With regards to the media and other public sources, only certain individuals are authorized to speak on the behalf of MSS. When approached by an outside party for any answers or statements that will reflect on/represent MSS, employees should contact the Managing Director.

Demonstrating Corporate Citizenship: Social & Environmental Responsibility

SOCIAL RESPONSIBILITY

MSS is committed to making a sustainable positive impact on the communities in which we operate.

We aim to make a distinctive contribution to equality and social development through the establishment of effective partnerships and programs that make best use of the energies and skills of our employees. We support our employees in fundraising for charities and voluntary work, recognizing both the benefit to the community and to the employees themselves.

MSS aims during financial year 2023-24 to implement our employee commitment to charity, providing one fully paid Charity Day per year for each employee. This supports our commitment to having our employees give back to the community while ensuring they are paid through the company for their volunteer efforts.

In addition, MSS as an organization is committed to making corporate donations, both monetarily and through volunteer efforts. We have formed partnerships with a variety of local and national charities and organizations, for example:

- Unseen – A UK Anti-Slavery Charity
 - Member of Business Club, actively participating in meetings, review of company policies, staff training and awareness. Additionally, have participated in fundraising.
- Children's Hospice South West
 - Member of Business Club, regular meetings with other local business and donations and staff fund-raising for local Children's Hospices.
- St Michael's Church, Stoke Gifford (local parish to Headquarters)
 - Donation of IT Goods and Services, donations to community projects
- Business South West (Chamber of Commerce)
 - Member of Business Club and fundraising

ENVIRONMENTAL RESPONSIBILITY

At MSS, it is important to us that we take measures to conserve resources and forward the sustainability of our environment. We comply with all laws, rules and regulations regarding

the environment, and we continue to look for ways to help support environmental preservation. MSS are to produce a Net Zero Carbon policy and targets during 2024.

Reporting Non-Compliant Behaviour (Whistleblowing Procedures)

It is important that any criminal behaviour or other wrongdoing by an employee, or any individual undertaking work with the organisation is reported and properly dealt with.

This Whistleblowing policy is underpinned by the Public Interest Disclosure Act 1998 (PIDA), also known as the Whistleblowers Act. This gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The organisation is committed to ensuring that no member of staff should feel at a disadvantage in raising legitimate concerns.

This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to other procedures e.g. disciplinary. These concerns could include:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes.
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these.

Confidentiality

The organisation will treat all such disclosures in a confidential and sensitive manner. The identity of the employee making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Procedure

If an employee has a concern, they should first raise it with their line manager, verbally or in writing. If they feel that this person may be involved or do not wish to approach them, then they should approach the Managing Director

If the employee feels a senior manager/trustee may be involved, the employee should report the matter to external authorities.

MSS Management will ensure that an investigation takes place and make an objective assessment of the concern. This may involve an informal discussion or more formal interviews. The employee will be kept advised of progress and the organization will ensure the action necessary to resolve the concern is taken.

In all cases, the employee is encouraged to exhaust MSS's internal procedures before contacting external sources such as the Health & Safety Executive, Environment Agency etc.