

**DATATECH**

**CODE OF BUSINESS CONDUCT**

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Dear Colleague,

At Datatech we always had a strong commitment to integrity and high ethical standards. Our success and reputation relies upon all employees conducting our business with integrity and respect for the law. Our reputation for honesty and reliable business conduct has been built over the years. This reputation sets high expectations for our future conduct in our business activities. Our customers and our partners expect this from us.

Our Code of Business Conduct is designed to help us all to act consistent with our core values, company policies and the law of the land. These values include Integrity, Quality, Accountability, Customer care, and Respect. Our code reflects the importance of doing business with higher standards of compliance and ethics.

These values should guide us not only in our business life but in our personal life as well. They help us define how well we behave in achieving our vision *“to be a premier provider of innovative value-based, scalable technology solutions to drive business productivity, streamline processes, and increase collaboration across the organizations that use our solutions”*.

The code applies to all directors, officers and employees of the company irrespective of the department you work for. Please read it carefully and join me in making a commitment in doing business with integrity.

Nicos Apostolides

Director

## 1. INTRODUCTION

Datatech is committed in conducting business with the highest ethical standards and all applicable laws. Failure in doing so may expose us to serious harm. For us integrity means commitment to the highest ethical standards. Nothing is more important.

This code of business conduct applies to all directors, officers and employees of Datatech and is designed to give an understanding of the conduct required by all of Datatechs' employees.

In the following pages you will find a series of guidelines for the proper conduct of business. As an employee of Datatech you should always have in mind that you must act with integrity honesty and respect in all matters.

### Our values

#### **Integrity**

We conduct our business in accordance with ethical, legal and professional standards.

#### **Quality**

We are committed in providing high quality products and services. We set high standards of performance for ourselves and our team.

#### **Accountability**

We are accountable to our colleagues and partners to deliver the agreed goals. We take ownership of issues and dedicate resources in resolving them.

#### **Customer care**

We ensure customer satisfaction and their needs are met. We give our best self in building meaningful customer relationships.

#### **Respect**

We treat others the way we want to be treated. We build respectful and honest relationships with customers and colleagues.

## 2. COMMITMENT TO EMPLOYEES

### EMPLOYMENT PRACTICES

We are an equal opportunities employer. Selection and remuneration are based on merit with no regard to race, sex, sexual orientation, disability or ethnicity. We comply with all applicable labour laws.

### EMPLOYEE RECORDS

Datatech safeguards the confidentiality of employee records by informing employees on what files are kept on them. Persons using those files are duly authorised and do so for company purposes.

Employees are allowed to inspect all information in their personnel files except any investigatory and audit material unless otherwise provided by law. The company will always comply with applicable laws relating to employee records and files.

### PERSONAL DEVELOPMENT

We strongly believe that the development of specific skills and on the job training are fundamental to the quality of work of each employee. We give our employees the opportunity to better themselves by participating to training courses and seminars.

## 3. HIGHLIGHTS OF THE CODE

- The law must be followed
- Always avoid conflicts of interest.
- All financial transactions must be accurate and on time
- Company assets must always be used with care and not for personal benefit.
- Suppliers, competitors and customers must always be dealt with fairly and at arm's length
- Never attempt to improperly influence or bribe any business associate.
- Take all reasonable measures to safeguard the company's non-public information
- Violations of the code, enticing or asking others to violate the code, not reporting a code violation or not cooperating to a code violation investigation, will result in a disciplinary action. Discipline will vary depending on the circumstances and may include alone or in combination, reprimand, demotion, reduction in remuneration, suspension, or termination of employment.
- When in an uncertain situation always ask before taking action.

## 4. CONFLICTS OF INTEREST

### OVERVIEW

A conflict of interest arises or exists when the personal interests of a director, officer or employee may compromise the duty and loyalty they owe to Datatech. Your personal interests must not conflict or appear to conflict with the interests of the company. The code cannot address every potential conflict. You should use and exercise common sense and if in doubt seek advice.

### GENERAL PRINCIPLES

- If you have a financial interest direct or indirect in any transaction between the company and a third party that interest must be approved by the company.
- If you have a financial interest in a supplier or a customer, because of a member of your family working there, you do not have to seek for approval unless you deal directly with the supplier or customer or your family member deals directly with the company.
- If you would like to serve as an officer, director or consultant to an outside business on your own time you must seek and receive approval. If circumstances of the outside business change you must seek re-approval.
- Personal loans from the company to the directors and officers are not allowed. Loans to other officers and employees are allowed but must be approved in writing.
- Avoid any situations where your personal interests interfere with your judgment while acting in the best interest of the company.

## 5. FINANCIAL RECORDS

### OVERVIEW

The company established a high standard of accuracy in its financial records in accordance with International Financial Reporting Standards requirements. Every financial record must be in accordance with the law. These records form the basis for managing the company's business and for fulfilling its obligations to its customers suppliers, employees and the authorities.

If you come across any violations you should record and document the violation and report it. Failure constitutes violation of the code by you as well. If you have any questions ask for guidance. You may report any concerns you have on controls, or any matters you think may be involving fraudulent behaviour by officers or employees, anonymously or on a confidential basis, directly to the Board of Directors.

**GENERAL PRINCIPLES**

- Always record and classify transactions in the proper period, account and department.
- Never falsify any document or distort or disguise the true nature of any transaction.
- All transactions must be supported by accurate documentation and kept for audit purposes.
- Maintain sufficient controls to ensure accurate record keeping.
- Cooperate with the company's auditors and or others consultants to ensure the accuracy of the company's financial records.
- If accruals or estimates are necessary in company reporting these must be supported by appropriate and adequate documentation based upon professional opinion. Intentionally misestimating the figures constitutes a violation of the code.

**6. USE OF COMPANY ASSETS****OVERVIEW**

All directors, officers and employees should avoid using their position, company information or company assets for personal gain or use. All employees have a duty and an obligation to protect company assets and to exercise care in using company property. When we refer to company assets we mean company equipment, vehicles, computers, software, other company information, such as company reputation and name.

Company assets are meant for the company and not for personal use. Common sense should prevail however on let's say the occasional personal phone call. The point here is to acknowledge that misuse or theft of company assets is a clear violation of the code.

**GENERAL PRINCIPLES**

- Employees, directors and officers of the company may not use the company assets for their personal benefit or for the benefit of anyone else other than the company.
- Employees, directors and officers of the company may not compete with any other third party against the company.
- Company equipment and assets such as computer systems, vehicles etc are to be used for company use and in accordance with applicable internal controls and security measures.

Misuse of company assets may be considered theft and may result in termination of employment and or prosecution.

## 7. DEALINGS WITH OUR CUSTOMERS AND SUPPLIERS

### OVERVIEW

We are successful through honest business competition. We do not seek to gain competitive advantage through illegal or unethical business practices. We build and maintain mutually beneficial relationships with our customers by providing safe and high quality products, and by upholding the law in all our interactions with them. We follow all contract specifications and always honour them. Equally important is the relationship with our suppliers. We use legitimate business related criteria when choosing them. We never take unfair advantage of them and we enter into agreements with them only after we establish that they share the same level of commitment to integrity as ourselves.

It is normal and customary to exchange gifts with our customers and suppliers. The key here is to keep an arm's length relationship. It is very important that all employees, directors and officers of the company, always deal honestly and with integrity with persons and companies with which you do business. You should avoid excessive gifts and avoid any personal financial transactions with customers and suppliers that may influence your ability to perform your job.

### GENERAL PRINCIPLES

- Acceptance of cash or cash equivalent is forbidden under any circumstances.
- Cash or cash equivalent should never be given or promised to persons who do or would like to do business with our company.
- Always deal in a fair manner with the company's customers suppliers competitors or employees. No one should take advantage of anyone through unfair dealings.
- Entertainment or gifts to customers, potential customers or suppliers must be reasonable and within reasonable limits. Always take into consideration our customers and suppliers own rules on gifts and entertainment.



## 8. INTERACTION WITH THE GOVERNMENT

### OVERVIEW

Doing business with the Government or semi Government organisations is somewhat different than doing business with private parties. Transactions are often covered by special legal rules and it often involves a variety of procurement and ethics laws and procedures. All directors, officers and employees of the company must exercise good judgment so as to avoid any contact which could be in anyway construed as attempting to influence, secure or reward any improper advantage or benefit from any government customer, employee or anyone employed by directly by the government.

Should you become aware of any investigation or you believe that a government investigation or inquiry involving our company is imminent you should immediately inform the management, who based upon the nature and circumstances, will take all reasonable steps to safeguard the interests of the company.

We are committed in contacting our operations ethically and within the law. It is the company's policy that any director, officer or employee should not receive, give, offer, or promise to offer, or pay any financial benefit directly or indirectly for the purpose of obtaining a business advantage or affect any government decision.

Offering, promising, or giving a financial advantage irrespective of the size to any public official could be a violation of anti-bribery and anti-corruption laws especially if it is done with the intent to influence the official decision in obtaining or retaining a business advantage.

### GENERAL PRINCIPLES

- We may not solicit, give or receive commercial bribes or unlawful kickbacks.
- The ban on bribes applies to third parties acting on behalf of the company.
- We comply with all anti-corruption and anti-bribery laws.
- Our company prohibits any improper payment to any person. Engaging or appearing to engage in bribery could expose you and the company to criminal liability.
- Also any direct political contributions are not allowed. However contributions may be allowed in connection with lawful lobbying activities through a trade association or an outside associate, (law firm or accountants or other consultants)

## 9. INFORMATION PROTECTION

### OVERVIEW

It is our obligation and duty to protect and safeguard the company's non-public information. All employees may at some point in time be in a position to know such information. You should not share this information with anyone outside the company including your family and friends. Also sharing the information within the company should only be done to those colleagues who need to know this kind of information.

Non-public information is any information not made available to the general public. It includes financial information, information on new products, marketing activities, personal information about employees, information on prospective customers and contracts, expansion plans, management changes and any other major company developments.

### GENERAL PRINCIPLES

- You should not disclose any non-public information to anyone outside the company.
- Disclosing non-public information to others including family and friends is a violation of the code.
- As our company protects its own non-public information we respect the non-public information of other companies. Should you become aware of non-public information of other companies seek guidance as it may lead to prosecution if used.
- All information records of the company are kept, used and destroyed according to the company's information retention policies. In cases of legal action different rules apply and you should seek advice on how to handle this information.

## 10. PROTECTION OF THE ENVIRONMENT

### OVERVIEW

We are committed to protecting human health, and the environment .We always comply with all applicable environmental laws and regulations and we are committed in using equipment and materials with the least environmental impact.

### GENERAL PRINCIPLES

- Our highest priority is to protect the safety and health of our employees, and our customers.
- We comply with health, safety and environmental requirements.
- We identify control and to the best of our abilities reduce waste and inefficient use of energy.
- We periodically review and our processes and strive for improvement.

## 11. SAFETY AT WORK

### OVERVIEW

It is our policy that our operations are conducted in a manner that protects the health and safety of our employees. We follow sound practices to foster a safe workplace.

### GENERAL PRINCIPLES

- Safety is the responsibility of every employee. By following safe work practices you can prevent injury to yourselves and your co-workers
- The success of accident prevention efforts depends on the support of all employees. Accident prevention is a concerted effort for the benefit of all and the company expects employees to follow safe work practices.
- Accident prevention is an operating responsibility, so managers and supervisors are directly responsible for continuously observing and to improve processes in order to prevent accidents.

## CONCLUSION

Compliance with the law and conducting Datatechs' business with the highest ethical standards should always be in our mind. When in doubt for some action always ask your supervisor or your manager.