

ETHICAL POLICY

October 2022

1. PURPOSE

- 1.1. Burstfire Networks Limited (“Burstfire”) is committed to the practice of responsible corporate behaviour.
- 1.2. Through its business practices, Burstfire seeks to protect and promote the human rights and basic freedoms of all its employees and agents.
- 1.3. Further, Burstfire is committed to protecting the rights of all of those whose work contributes to the success of Burstfire, including employees and agents of suppliers to Burstfire.
- 1.4. Burstfire is also committed to eliminating bribery and corruption. It is essential that all employees and persons associated with Burstfire adhere to this Policy and abstain from giving or receiving bribes of any form.
- 1.5. This Policy is non-exhaustive, and all aspects of Burstfire’s business should be considered in the spirit of this policy.

2. HUMAN RIGHTS

- 2.1. Burstfire is vehemently opposed to the use of slavery in any forms; cruel, inhumane or degrading punishments; and any attempt to control or reduce freedom of thought, conscience and religion.
- 2.2. Burstfire will ensure that all of its employees, agents and contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights and the Human Rights Act 1998.
- 2.3. Burstfire will not enter into any business arrangement with any person, company, or organisation which fails to uphold the human rights of its workers or who breach the human rights of those affected by the organisation’s activities.

3. WORKERS’ RIGHTS

- 3.1. Burstfire is committed to complying with all relevant employment legislation and regulations. Burstfire regards such regulations and legislation as the minimum, rather than the recommended standard.
- 3.2. No worker should be discriminated against on the basis of age, gender, race, sexual orientation, religion or beliefs, gender reassignment, marital status, or pregnancy. All workers should be treated equally. Workers with the same experience and qualifications should receive equal pay for equal work.



- 3.3. No worker should be prevented from joining or forming a staff association or trade union, nor should any worker suffer any detriment as a result of joining, or failing to join, any such organisation.
- 3.4. Workers should be aware of the terms and conditions of their employment or engagement from the outset. In particular, workers must be made aware of the wage that they receive, when and how it is to be paid, the hours that they must work, and any legal limit which exists for their protection and any overtime provisions. Workers should also be allowed such annual leave, sick leave, maternity/paternity leave and such other leave as is granted by legislation as a minimum.
- 3.5. Burstfire does not accept any corporal punishment, harassment in any form, or bullying in any form.

4. ENVIRONMENTAL ISSUES

- 4.1. Burstfire is committed to keeping the environmental impact of its activities to a minimum and has established an Environmental Policy in order to help achieve this aim. Copies of the Environmental Policy are available from your account manager.
- 4.2. As an absolute minimum, Burstfire will ensure that it meets all applicable environmental laws in whichever jurisdiction it may be operating.

5. CONFLICTS OF INTEREST

- 5.1. Burstfire holds as fundamental to its success the trust and confidence of those with whom it deals, including clients, suppliers, and employees. Conflicts of interest potentially undermine the relationship of Burstfire with its partners.
- 5.2. In order to help preserve and strengthen these relationships, Burstfire has developed a Hospitality and Gifts Policy, which provides rules and guidelines concerning the conduct of its offers and employees aimed at minimising the possibility of conflicts of interest and at avoiding risks associated with bribery and corruption. Copies of the Hospitality and Gifts Policy are available from your account manager.
- 5.3. All officers, employees, and representatives of Burstfire are expected to act honestly and within the law.

6. INFORMATION AND CONFIDENTIALITY

- 6.1. Information received by employees, contractors, or agents of Burstfire will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given.
- 6.2. Burstfire will at all times ensure that it complies with all applicable requirements of the Data Protection Legislation. "Data Protection Legislation" means all applicable legislation in force from time to time in the United Kingdom applicable to data protection and privacy including, but not limited to, the UK GDPR (the retained EU law version of the General Data Protection



Regulation ((EU) 2016/679), as it forms part of the law of England and Wales, Scotland, and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018); the Data Protection Act 2018 (and regulations made thereunder); and the Privacy and Electronic Communications Regulations 2003 as amended.

7. SHAREHOLDERS AND INVESTORS

- 7.1. Burstfire, its officers, employees, and representatives are committed to ensuring that no act or omission which is within their power, and which would have the effect of deliberately, negligently, or recklessly misleading the shareholders, creditors, or other investors in Burstfire occurs.

8. SUPPLIERS AND PARTNERS

- 8.1. Burstfire expects all suppliers and partners to work towards and uphold similar ethical and moral standards.
- 8.2. Burstfire will investigate the ethical record of potential new suppliers before entering into any agreement. Further, Burstfire reserves the right to request information from suppliers regarding the production and sources of goods supplied.
- 8.3. Burstfire reserves the right to withdraw from any agreement or other arrangement with any supplier or partner who is found to have acted in contravention of the spirit or principles of this Ethical Policy.

9. BRIBERY AND CORRUPTION

- 9.1. Burstfire is fundamentally opposed to any acts of bribery and to the making of facilitation payments as defined under the Bribery Act 2010.
- 9.2. Employees and other persons associated with Burstfire such as agents, subsidiaries, and business partners are not permitted to either offer or receive any type of bribe and/or facilitation payment.
- 9.3. All employees are encouraged to report any suspicion of corruption or bribery within Burstfire in accordance with the Whistleblowing Policy available from your account manager.
- 9.4. Should any employee or associated person be in doubt when receiving or issuing gifts and hospitality, they must refer to the Gift and Hospitality policy available from a Burstfire director.
- 9.5. Burstfire uses its reasonable endeavours to implement the guidance principles on bribery management that are published, from time to time, by Secretary of State in accordance with Section 9 of the Bribery Act 2010.
- 9.6. If an employee or associated person is found guilty of giving or receiving a bribe, they will be personally criminally liable and may be subject to disciplinary action.



- 9.7. Anyone found guilty of bribery will be responsible for bearing any related remedial costs such as losses, court fees, or expenses.

