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Office Manager

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Global Code of Conduct Policy

GLOBAL CODE OF CONDUCT POLICY

Quick Start

Welcome. This Global Code of Conduct explains how we behave, work, and make decisions at Iristel. It is essential that all employees, contractors, and representatives understand and follow this policy.

If you are first reviewing this policy, please begin with the following sections:

- Section 1.1 (What This Covers) – Purpose and scope of the policy
- Section 1.3 (Roles and Responsibilities) – Responsibilities and support resources
- Section 1.7 (Workplace Behaviour Expectations) – Standards of workplace conduct
- Section 1.8 (Speaking Up When Something's Wrong) – How to report concerns (you are protected)

Reading time: Full policy takes 30 minutes (key sections takes 10 minutes)

Where to Get Help

- HR support: hr@iristel.com or internal HR contact channels
- Reporting concerns: See Section 1.8 for available options

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Part 1: Core Policy

1.1 What This Covers

1.1.1 Purpose

At Iristel, our people are our most valuable asset. We believe that when employees are supported, challenged, and developed, they are best positioned to perform at their highest level and deliver the quality of service our clients expect.

The Iristel Global Code of Conduct defines what “doing the right thing” means within our organization. It sets out the principles, behaviours, and cultural expectations that guide how we work together and reflects the shared values and professional standards that define our global workplace.

This Code helps everyone understand:

- How we treat each other in the workplace
- How we conduct business with customers and partners
- What is expected of every employee and representative of the organization
- What to do when you observe behaviour or situations that may not align with our values or standards

This policy is not just about following rules. It is about creating a workplace built on respect, integrity, accountability, and professionalism—where employees feel valued, customers are treated fairly, and everyone can be proud of their work.

Why This Matters for Compliance

We are committed to maintaining a safe, healthy, and respectful work environment that supports employee well-being and teamwork. Keeping this environment positive is everyone's responsibility.

Many customers and business partners expect strong ethical standards and effective corporate governance as part of their due diligence and security assessments, including compliance with frameworks such as SOC 2.

As responsible corporate citizens, we are committed to acting with integrity and continually broadening our skills, experience, and perspectives through our work, collaboration, and involvement in the communities we serve.

This Global Code of Conduct reflects our shared commitment to fostering a respectful, ethical, and professional work environment. It provides the standards and expectations that guide how we conduct ourselves and interact with one another, while supporting the continuous improvement of our organization. Open communication is encouraged and valued, but it must always be respectful, constructive, collaborative and professional. Any behaviour that is disruptive, disrespectful, discriminatory, or otherwise harmful to individuals or the organization is unacceptable and will not be tolerated.

1.1.2 Scope

This policy applies to all prospective or current employees of Iristel regardless of employment agreement or rank. The Global Code of Conduct is intended for use:

- By our leadership and management teams, to help them ensure that the decisions they make, the role models they represent, and the expectations they have of their colleagues consider both their responsibilities and Iristel's Values
- By new and prospective employees as a guide to understanding Iristel's values, standards, and expectations when considering or beginning employment with the organization
- By our clients, suppliers, and contacts, as they seek to understand the nature of the organization with which they are dealing
- Most importantly, by all our people, to recognize what is expected of them and the responsibilities resting on each of them to make sure we all adhere to the Values, for the benefit of each other.
- Iristel's values lie at the heart of the way we do things and define our culture and our commitment to the highest principles of personal and professional conduct.

What You Need to Do

All individuals covered by this policy are expected to:

- Read and understand this Code of Conduct

- Sign the policy acknowledgment form provided by HR
- Complete any required training
- Follow the policy in your daily work activities
- Ask questions when you are unsure about expectations or requirements
- Speak up and report concerns when you observe potential issues

When This Applies

This policy applies at all times when acting in a professional or representative capacity for Iristel, including:

During working hours

- At company events (including meetings, social events, and off-site activities)
- When interacting with customers, partners, or suppliers
- While on business travel
- When using company systems, devices, or email
- When posting or communicating about work in any public or online setting

Key Principle

If you are ever unsure whether something is appropriate, you are expected to ask for guidance. It is always better to confirm first than to make an incorrect assumption.

1.2 Key Terms

Confidential Information: Any non-public information about Iristel, our customers, or business partners. This includes customer data, financial information, product plans, pricing, internal documents, and anything marked as confidential. If you learn it through your work and it is not publicly available, it must be treated as confidential.

Conflict of Interest: A situation where your personal interests could influence, or appear to influence, your work decisions. This includes situations such as family members working for vendors or customers, owning shares in a competitor, or being involved in hiring decisions related to someone you know. All actual or potential conflicts must be disclosed to your manager or HR.

Discrimination: Unfair treatment of an individual based on protected characteristics such as race, gender, age, religion, disability, or similar attributes. Discrimination is not tolerated in any aspect of employment, including hiring, promotion, compensation, or daily work interactions.

Harassment: Any unwelcome conduct that creates a hostile, intimidating, or offensive work environment. This includes inappropriate comments, jokes, behaviour, or physical conduct. Sexual

harassment includes any unwelcome sexual behaviour, and a single serious incident is sufficient to constitute a violation.

Retaliation: Any negative action taken against someone for reporting concerns or participating in an investigation. This includes demotion, termination, exclusion, or unfair treatment. Retaliation is strictly prohibited.

Reporting / Speaking Up: Raising concern about suspected misconduct, policy violations, or unethical behaviour through a manager, HR, or reporting channel. Employees are protected when reports are made in good faith, even if concerns are not ultimately substantiated.

Insider Trading: Buying or selling company stock based on confidential, non-public information. This is illegal. Employees must not trade on confidential information or share it with others who may trade based on it.

Protected Disclosure: A report made in good faith about suspected misconduct or policy violations. “Good faith” means you genuinely believe there may be an issue based on the information you have, even if you are not completely certain or do not have full evidence.

1.3 Roles and Responsibilities

Each Iristel partner and employee is personally responsible for following the legal, professional, and ethical values & standards that apply to his or her job function and level of responsibility.

Owners / CEO / Founders: Set the Tone

Owners / CEO / Founders are responsible for setting the ethical direction of Iristel by:

- Modeling the behaviour expected across the organization
- Making decisions that reflect integrity, even when difficult or costly
- Supporting employees who raise concerns in good faith
- Ensuring policy violations are addressed consistently and fairly
- Providing HR and managers with the tools and resources needed to enforce this Code
- Reinforcing ethical expectations regularly, not only during compliance reviews

Owners / CEO / Founders are accountable for setting the standard. Without visible leadership commitment, this Code of Conduct cannot be effective.

HR Department: Make It Work

At Iristel, HR is responsible for supporting the effective implementation of the Code of Conduct by:

- Ensuring all employees receive, understand, and acknowledge the policy
- Responding to questions about acceptable behaviour and policy expectations

- Receiving and investigating reports of potential violations
- Maintaining confidentiality throughout the investigation process
- Recommending appropriate corrective actions when violations occur
- Tracking policy acknowledgments and training completion

Managers: Enforce Daily

Those with leadership roles have additional responsibilities. Whether you are a partner or the supervisor of a small team, you should:

- Lead by example – Show through your actions what it means to act with integrity and to act in accordance with the principles of the Code.
- Support your team – Ensure that those you lead know and understand the Code and have access to the resources they need to adhere to the Iristel Values.
- Develop your team – Set clear, measurable, and challenging goals that promote ethical behaviour and the highest standards of client service.
- Uphold exemplary standards – As a leader, you should enforce Iristel's standards consistently and fairly and promote compliance with the Code among those you lead.
- Exercise your judgment – Respond thoughtfully and carefully to those who raise questions and concerns in good faith.
- Be accountable – You should be prepared to be held personally accountable for any shortcomings in your own behaviour as well as those of the people you lead.

Individual Responsibilities

Every Iristel employee is individually responsible for ensuring these commitments are met. As an Iristel employee, you are expected to:

- Stay informed – Participate in training, read communications, share information, use Iristel resources, and consult when necessary to stay informed about laws, professional standards, and Iristel policies that apply to you in your work.
- Stand firm – No matter how strong the pressure to achieve targets or to act in an inappropriate way, you should never compromise Iristel Values. Respect each team member and do not be afraid to express differences of opinion or deliver unwelcome messages.
- Take ownership – Incorporate the principles of the Global Code into your daily activities. Every employee shares responsibility for protecting Iristel's integrity and reputation. It takes only one individual to damage the trust we have built. Always strive to uphold the highest standards of ethics, integrity, and professionalism.

- Raise issues – Your voice counts, challenge assumptions, pursue facts. Speak up if something does not seem right. Raise your concerns and offer suggestions for improvement.
- Consult with others – You are not expected to have all the answers. When in doubt, or if you believe you or someone else may have made a mistake, seek guidance and consult with the appropriate individuals. By working together, sharing knowledge, and supporting one another, we build strong, respectful, and successful working relationships.

Quick Reference Table

Role	Key Responsibilities
You	Follow the Global Code of Conduct, ask questions when unsure, and report concerns in good faith
Manager	Enforce the policy within the team, support employees, and escalate issues to HR
HR	Provide training, support policy understanding, investigate concerns, maintain confidentiality, and recommend corrective actions
Leadership	Set the tone, model ethical behaviour, ensure accountability, and support a strong compliance culture

1.4 Commitments

Our people are the employees, partners, subcontractors, consultants, and others with whom we work in the provision of, and support of, professional services.

- Help our people to be objective, ethical, and professional
- Encourage our people to raise ethical and professional issues without fear of retaliation
- Invest in our people's professional development so that they can reach their full potential
- Champion an inclusive and collaborative culture that is free from bullying, discrimination, and harassment, where everyone is treated with respect and dignity
- Respect the confidentiality of our people's personal data
- Provide a safe and healthy work environment
- Provide appropriate work/life flexibility
- Maintain a just and fair approach to remuneration

Our network is the organizational structure which links Iristel around the world.

- Accept the right clients and only accept engagements that we can perform consistent with our high-quality standards
- Work with clients, suppliers, and subcontractors that live up to Iristel core ethical standards
- Drive quality by developing and applying appropriate Iristel methodologies and procedures
- Address challenging situations in the right way by applying professional ethics and consulting with experienced people within Iristel to reach the right conclusions
- Strive at all times to protect and enhance Iristel's brand and reputation
- Keep assets and resources safe and use them only for appropriate business purposes

Our communities are the marketplaces, locations, authorities, and societies in or with which we operate and with which we engage.

- Contribute to a better-functioning market economy
- Act as a responsible corporate citizen—play an active role in global initiatives relating to climate change, sustainability, and international development
- Manage our environmental impacts
- Follow high standards of ethical conduct around the world
- Work with other businesses, governments, and charitable organizations to create stronger communities

1.5 Ethics and Professionalism

The foundation: Ethical Behaviour at Iristel means doing the right thing, using good judgment, and acting in the best interest of the company, our customers, and our colleagues—even when no one is watching.

1.5.1 In Practice

Ethic:

Our ethical behaviour—that is to say our personal recognition of what is appropriate, what is right, and what is for the wider benefit of us all—should guide our response to the situations that arise in the course of our work at Iristel.

You are required to report potential or suspected violations of Iristel policy or applicable laws, regulations, or professional standards. This includes situations when you know or suspect that colleagues, clients or parties associated with clients, or suppliers, subcontractors, or associated third parties are engaged—or may be about to engage—in illegal or unethical activity.

The Global Code of Conduct reminds each of us how to behave in response to the challenges we face as professionals in the modern global business world.

- **Be Honest:** Tell the truth in all business dealings, even when it is difficult.
 - Be transparent about what we can and cannot deliver.
 - Take responsibility for mistakes and work to correct them promptly.
 - Record information accurately, including time worked, expenses, customer data, and business records.
 - Give credit where it is due and never claim someone else's work as your own.

Example: A customer asks whether we can deliver a feature by a specific date, but you are unsure whether the timeline is achievable. Instead of making a commitment you cannot guarantee, say: "Let me confirm with the team and get back to you with a realistic timeline."

- **Treat Everyone with Respect:** Be courteous and professional with colleagues, customers, suppliers, contractors, and other business partners.
 - Value diverse perspectives, backgrounds, and experiences.
 - Listen actively and respectfully to others.
 - Address disagreements constructively and professionally.
 - Avoid disrespectful language, harassment, discrimination, bullying, or dismissing others' concerns.

Example: During a meeting, a colleague proposes an idea that you believe may not be effective. Rather than saying, "That's a bad idea," respond professionally: "I have some concerns about that approach. Could we discuss the potential challenges and explore other options?"

Respectful communication fosters collaboration, innovation, and a positive workplace culture.

Professionalism:

Employees are expected to perform their job duties in a manner conducive to a safe workplace, following all employer practices, policies, and procedures.

- **Personal Appearance:** All employees must follow the dress code and personal appearance guidelines of Iristel. Non-conformity will be met with disapproval, and the employee will have to change their conduct to meet the Iristel's standards.
- **Conflict of Interest:** All employees are expected to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties or be damaging to the company. Any situation voluntary or involuntary that might be perceived as conflict of interest must be promptly disclosed to the appropriate manager and Human Resources so that the situation can be reviewed and managed appropriately.
 - Common conflicts that must be disclosed: Family members or close personal relationships with individuals who work for our customers, suppliers, vendors, or competitors.

- Owning stock or having a financial interest in companies that do business with or compete against Iristel.
- Outside employment, consulting, freelance work, or other business activities, even if unrelated to your role at Iristel.
- Serving as a director, advisor, or board member of another organization.
- Operating or participating in a side business or personal venture.
- What to do: If you believe you may have a conflict of interest, report it to Human Resources. Disclosure does not automatically mean that you cannot participate in the activity; it allows Iristel to assess the circumstances and determine appropriate measures to maintain transparency, fairness, and sound business judgment.
- Must Disclose Example: Family Relationship

Your sister works in sales for one of Iristel's major vendors. Although you are not involved in purchasing decisions, you should disclose this relationship. If you later participate in decisions involving that vendor, Iristel can take appropriate steps to ensure the process remains fair and objective.

- Must Disclose Example: Outside Employment

You are considering providing freelance consulting services on weekends for companies in a different industry. You should disclose this opportunity to your manager and Human Resources before accepting the work. As long as the activity does not compete with Iristel, interfere with your responsibilities, involve confidential information, or use company resources, it may be approved.

- Corruption: Employees are actively discouraged from accepting gifts from clients or partners and strictly prohibited to accept bribes for the benefit of any external or internal party. Such behaviour may invoke legal actions that will be damaging for both parties responsible.
 - General Rules for Accepting Gifts:
 - Under \$50: May generally be accepted if the gift is reasonable, infrequent, and clearly business-related. Employees should inform their manager.
 - Over \$50: Manager approval is required before accepting the gift.
 - Over \$100: Human Resources approval is required before accepting the gift.
 - Cash or cash equivalents (including gift cards): Never acceptable, regardless of value.
 - During contract negotiations, procurement decisions, or other sensitive business activities: Gifts or entertainment should not be accepted without prior approval.

- Examples:

- Acceptable: A vendor sends you a \$25 gift basket during the holiday season as a general business courtesy. You may accept the gift if it complies with this policy and should inform your manager.
- Not Acceptable: A vendor offers you playoff tickets valued at \$300 while contract negotiations are taking place. You should politely decline "Thank you for the offer, but our policy does not allow me to accept gifts during contract negotiations."

If a gift feels inappropriate, creates a sense of obligation, or could affect your ability to make an objective business decision, you should politely decline it and consult your manager or Human Resources.

- Job Duties and Authority: All employees must pay attention to their job duties and fulfill them with integrity and respect towards the customers, stakeholders and community. Supervisors and managers are prohibited from abusing their authority but are expected to delegate duties to their subordinates with respect to their competences and workload. Mentoring and motivating are actively encouraged. All employees are expected to follow supervisor's instructions and execute all of their duties as assigned with skill and in a timely manner.
- Attendance, Punctuality, and Professional Use of Work Time: Employees are expected to maintain regular attendance, arrive on time, and follow their established work schedules. While Iristel recognizes that occasional circumstances may prevent employees from meeting their schedules, repeated absenteeism, tardiness, or excessive unavailability during working hours may affect job performance and business operations. Employees are expected to use company time and resources responsibly, efficiently, and in support of their assigned job responsibilities. Work hours should be devoted to productive work activities, and employees are expected to perform their duties diligently and make effective use of their working time. Employees must:
 - Avoid excessive personal activities or unnecessary delays during work hours that interfere with productivity or result in the misuse or waste of company time.
 - Work efficiently and responsibly during scheduled working hours and manage their time in a manner that supports individual and team objectives.
 - Not use company resources, systems, or confidential information for personal gain, outside employment, or unauthorized activities.
 - Not use their position or access at Iristel for personal benefit.
 - Protect company, customer, and business information at all times, including when leaving the company.

Maintaining good attendance and the responsible, efficient use of work time demonstrates professionalism, accountability, and commitment to Iristel and its business objectives.

- **Collaboration:** All employees are expected to maintain a climate of friendliness and harmony and endeavor not to disrupt the workplace for the execution of their duties or present obstacles to the work of their colleagues. It is important to respect others' work and efforts. All employees are encouraged to work collaboratively when applicable.
- **Communication:** All employees must be open for communication with their colleagues, supervisors or subordinates. It is important that any employee in the workplace can refer to another so that their work as well as work conditions can be as productive and problem-free as possible.
- **Benefits:** All employees are discouraged from abusing the benefits provided to them by Iristel. This can refer to time off granted to an employee for a specific reason (e.g. sick leave), insurance, facilities, subscriptions or other benefits that the company offers.
- **Policies:** All employees are obliged to be aware of and follow all the established policies that have been created by Iristel and apply to the procedures, benefits and relations of the workplace.
- **Be Fair and Honest in Competition:** Iristel is committed to competing fairly, ethically, and in compliance with applicable laws. We compete based on the quality of our products, services, and customer relationships—not through unfair or improper practices. Employees must:
 - Compete based on the value, quality, and capabilities of our products and services.
 - Avoid making false, misleading, or negative statements about competitors.
 - Never seek or obtain competitors' confidential information through improper means.
 - Not discuss or coordinate pricing, customers, markets, or business strategies with competitors, as such activities may violate competition laws.

Fair competition builds trust with our customers, partners, and the marketplace while protecting Iristel's reputation and integrity.

- **Disciplinary Actions:** Failure to comply with any part of the Code of Conduct's guidelines will result in appropriate disciplinary action. The party responsible for non-compliance will be subject to repercussions that vary in regard to the severity of the violation. Possible consequences will include reprimand, detraction of benefits for a definite or indefinite time, demotion, suspension or termination for more serious offences. Legal action may have to be pursued in cases of corruption, theft, embezzlement or other unlawful behaviour.

1.5.2 The Bottom Line

Always ask yourself:

- Am I acting honestly and transparently?
- Would I be comfortable if this decision was made public?

- Am I treating others with respect and fairness?
- Am I protecting the company's integrity and reputation?

If the answer to any of these is “no” or “I’m not sure,” pause and seek guidance from your manager or HR before proceeding.

1.6 Keeping Information Confidential

Why Confidentiality Matters

At Iristel, we handle sensitive information about our business, customers, and employees every day. Protecting this information is essential. If confidential information is shared improperly, it can result in loss of customer trust, legal and financial consequences, competitive disadvantages, and regulatory violations.

What Is Confidential Information

All non-public information must be treated as confidential, even if it is not marked as such.

Company Information includes:

- Financial results and business performance
- Strategic plans, decisions, and product roadmaps
- Pricing, contracts, and internal business arrangements
- Security systems, vulnerabilities, and controls
- Customer information (unless publicly disclosed)
- Employee information such as salaries and personal records
- Any information marked “confidential” or “internal use only”

Customer Information includes:

- Data we process or store on behalf of customers
- Customer business plans and strategies
- Technical configurations and system details
- Information shared with us in confidence
- Customer identities (if not publicly known)

Employee Information includes:

- Compensation and benefits

- Performance reviews
- Personal and contact information
- Medical or sensitive personal data

How to Handle Confidential Information

DO:

- Keep information secure (lock screens, secure documents, use approved systems)
- Share only with individuals who need the information for work purposes
- Use company-approved tools and systems
- Ask if you are unsure whether information is confidential
- Report any accidental disclosure immediately

DON'T:

- Share confidential information with friends or family
- Discuss sensitive information in public spaces
- Send company information to personal email or storage accounts
- Post confidential content on social media
- Leave sensitive documents unattended

Examples:

- Proper Handling - You are preparing a proposal for a potential customer. You store the document in Iristel's approved file system, share it only with team members involved in the project, and do not discuss customer details with anyone outside the project team.
- Improper Handling - You send a customer data file to your personal email account so you can work on it from home. Even with good intentions, this violates company policy because confidential information must remain within approved company systems. If remote work is required, employees must use approved remote access methods.

Social Media Guidelines

Employees must be careful when sharing anything related to work:

You may:

- State that you work at Iristel
- Share official company posts

- Discuss general industry topics
- Celebrate publicly announced company news

You may not:

- Share customer names, projects, or internal work
- Post about unreleased products or services
- Share internal documents or confidential information
- Criticize customers or colleagues publicly

Rule of Thumb: If it is not publicly available through official channels, it should not be shared.

Examples:

- Acceptable - "Excited to be working on cloud security solutions at Iristel!"

This statement shares general information without revealing confidential details.

- Not Acceptable - " Excited to announce that we've secured a custom rollout for [Customer Name] including a private integration timeline and internal launch date."

This statement discloses confidential business information, including customer-related details, project plans, and timelines that have not been officially announced through approved company channels.

After Leaving Iristel

Confidentiality obligations continue even after leaving Iristel. Employees must return all company materials, delete company information from personal devices, and must not share or use confidential information in future roles.

If a Mistake Happens

If confidential information is accidentally disclosed:

- Inform your manager and HR immediately
- Explain what was shared and with whom
- Take steps to correct the issue if possible
- Cooperate with any follow-up actions

Prompt reporting is important. Hiding an issue is treated more seriously than the mistake itself.

1.7 Workplace Behaviour Expectations

To preserve the core values and business principles upon which our organization is found, the following is a list of unacceptable behavioural actions that have been classified as either:

- Hazardous to employee safety;
- Criminal;
- A negative influence on workplace morale; or
- Detrimental to the success of our business

Iristel reserves the right to discipline and, in certain cases, terminate the employment of any employee for participating in any conduct that violates Iristel's Global Code of Conduct standards and policies.

Unacceptable Actions/Behaviours shall include but not be limited to the following:

- Threatening or harassing and Discrimination behaviour;
 - Harassment may include:
 - Offensive comments, jokes, or behaviour related to race, gender, age, religion, disability, sexual orientation, or other protected characteristics.
 - Unwanted physical contact.
 - Sexual comments, advances, requests, or inappropriate behaviour.
 - Displaying offensive materials or images.
 - Intimidation, threats, or bullying.
 - Sexual harassment includes, but is not limited to:
 - Unwanted sexual advances or requests for sexual favors.
 - Sexually suggestive comments or jokes.
 - Unwanted touching or physical contact.
 - Sexual comments about someone's body or appearance.
 - Sharing sexual images or content.

Important: A single serious incident may be sufficient to constitute harassment. Employees do not need to wait for repeated behaviour before reporting a concern.

- Examples of harassing behaviour include:
 - Making jokes about someone's accent, ethnicity, or cultural background.

- Making inappropriate comments about a colleague's appearance.
- Repeatedly asking someone out after they have declined.
- Making fun of someone's religious beliefs or practices.
- Excluding someone from workplace activities because of their background.
- Using offensive or discriminatory language, even as a joke.
- Discrimination includes treating individuals unfairly because of protected characteristics, such as:
 - Refusing to hire or promote someone based on race, gender, age, religion, disability, or other protected characteristics.
 - Paying employees differently based on protected characteristics rather than legitimate business factors.
 - Applying different standards, rules, or opportunities to different groups.
- Alcohol and Drug: The use, possession, sale, manufacture, or dispensation of any illegal drug, alcohol, or paraphernalia associated with either while conducting company business or on company premises;

Employees must not:

- Consume or be impaired by alcohol or drugs while at work, except where alcohol is responsibly consumed at company-authorized events.
- Use alcohol or illegal drugs outside the workplace in a manner that adversely affects their job performance, workplace safety, or Iristel's reputation.
- Possess drug-related paraphernalia associated with illegal drug use on company premises.

Employees who are taking prescription medication that may affect their ability to work safely should notify their manager or Human Resources so that appropriate accommodations or safety measures can be considered.

Violations of this policy may result in disciplinary action, up to and including termination of employment.

- Willful damage or destruction to employer property or employee property;
- Possession of a weapon while on employer premises or while conducting business on behalf of the employer;
- Disorderly, immoral, or indecent conduct;

- Violation of health and safety practices, policies, and procedures;
- Theft, including physical and intellectual properties;
- Insubordination;
- Dishonest, illegal, or improper business activities;
- Job abandonment;
- Arriving to work late without providing advance notice or reasonable cause;
- Failure to properly report an absence; and
- Failure to meet stated goals, objectives, or performance metrics required for a position.

The duties of an employee are as follows:

- to be ready and willing to work;
- to offer their services personally: for example, must not subtract the work for which they are employed;
- to take reasonable care in the exercise of that service, including the duty to be competent at work and to take care of the Company's property;
- to not willfully disrupt Iristel's business;
- to obey reasonable orders as to the time, place, nature and method of service;
- to work only for Iristel in the Company's time;
- to disclose information to Iristel relevant to its business;
- to hold solely for the Company, the benefit of any invention relevant to the business on which Iristel is engaged;
- to be scrupulously impartial and honest in all affairs relating to Iristel and their job within it;
- to respect Iristel's trade secrets;
- in general, to be of good faith and do nothing to destroy the trust and confidence necessary for employment;
- to account for all benefits – monetary or in kind - received in the course of employment;
- to not give or receive bribes or otherwise act corruptly;
- to indemnify the employer for loss caused by the employee.

Policy Elements

Employees are bound by the terms of their contract to adhere to specific guidelines that apply to every work-related space during their work. All employees are obliged to know and follow the Employee Code of Conduct.

- **Compliance with Law:** All employees must protect Iristel's legality. Legal guidelines refer to all environmental, safety and fair dealing dictations of local and international law as well as Iristel policy for social corporate responsibility. In addition to these, all employees are obliged to refrain from unlawful or offensive behaviour against the company where its finances, products, partnerships or public image are concerned.
- **Respect in the Workplace:** All employees are bound by the equal opportunity policy of Iristel. They are obliged to behave in a respectful manner towards their colleagues and strictly refrain from any kind of discriminatory behaviour, harassment or victimization. This applies to all aspects of the workplace, from the recruitment and evaluation processes to interpersonal relations between employees. The company has no tolerance for this kind of behaviour and disciplinary actions will be taken when appropriate.
- **Protection of Company Property:** All employees should treat the property of Iristel, whether material or intangible, with respect and care. Company equipment must not be misused or used frivolously. All kinds of incorporeal property, including law-binding creations such as trademarks and copyright, as well as other elements for which it retains ownership (information, reports etc.) are to be respected and used only within the rights accompanying the duties of each position. Company facilities and other material property (e.g. company cars) must not be damaged or vandalized with an employee's responsibility. Such actions will invoke disciplinary and/or legal action in cases of voluntary violation.

Personal Relationships at Work

Personal relationships between employees are recognized; however, they must not create conflicts of interest, compromise professional judgment, or negatively affect the workplace.

Employees must:

- Promptly disclose to Human Resources any romantic or intimate relationship where a direct or indirect reporting relationship exists.
- Avoid supervising, evaluating, or making decisions regarding a partner's hiring, compensation, promotion, performance, discipline, or other employment matters.
- Maintain professional conduct in the workplace and ensure personal relationships do not interfere with work responsibilities or make others feel uncomfortable.

Where a reporting relationship exists, Iristel may adjust reporting lines or job responsibilities to eliminate actual or perceived conflicts of interest.

Remote Work Expectations:

If you work remotely, the same standards apply as in the office:

- Maintain professionalism during virtual meetings
- Keep your workspace appropriate and private
- Protect confidential information at home (do not expose it to others)
- Avoid working in public spaces where sensitive information could be seen or overheard
- Follow all confidentiality and security expectations at all times

1.8 Speaking Up When Something's Wrong

Speaking up is an essential part of maintaining integrity, safety, and trust at Iristel. Everyone is expected to report concerns in good faith when something does not seem right. Employees who raise concerns are protected from retaliation.

Why Speaking Up Matters

Reporting concerns early helps protect individuals, customers, and the company. By speaking up, you help:

- Protect yourself and your colleagues
- Protect our customers and partners
- Protect Iristel
- Prevent small issues from becoming serious problems

If you are unsure, it is always better to report than to remain silent.

What You Should Report

You must report any suspected or actual issues such as:

- Violations of this Global Code of Conduct or company policies
- Harassment, discrimination, or inappropriate behaviour
- Theft, fraud, or dishonest conduct
- Conflicts of interest (actual or potential)
- Safety risks or unsafe working conditions
- Data breaches, security incidents, or misuse of information

- Pressure to act unethically or illegally
- Any situation that feels wrong or concerning

How to Report

You can raise concerns through the following channels:

- Your Manager
 - Often the quickest way to address concerns
 - Your manager may escalate the issue to HR if needed
 - Do not use this option if your manager is involved or if you are uncomfortable reporting to them
- HR (Human Resources)
 - Email: hr@iristel.com
 - Suitable for all concerns, especially sensitive or serious matters
 - Reports will be handled confidentially where possible
- Senior Leadership (Owner/CEO): For serious matters involving senior management or when other channels are not appropriate

What Happens After You Report

All reports are taken seriously and reviewed appropriately.

- The report is received and assessed
- HR or an assigned investigator reviews the concern
- Interviews may be conducted with relevant individuals
- Evidence and documentation may be reviewed
- A fact-based determination is made
- The process is handled as confidentially as possible

Typical timeline:

- Most investigations take 2–4 weeks
- More complex cases may take longer

If a violation is found:

- Appropriate action will be taken (e.g., coaching, warning, or termination depending on severity)
- Steps will be taken to address and correct the issue

If no violation is found:

- No action may be required
- You are still protected as long as the report was made in good faith

Protection from Retaliation

Retaliation is strictly prohibited at Iristel. No employee will be punished for reporting concerns in good faith. Retaliation includes:

- Termination, demotion, or disciplinary action
- Reduced pay or hours
- Unfair performance evaluations
- Exclusion from meetings or opportunities
- Harassment, isolation, or negative treatment

Any suspected retaliation should be reported immediately and will be treated as a serious violation.

Good Faith Reporting

A report is considered “good faith” when it is made honestly based on what you know or believe.

You do not need:

- Proof
- Complete information
- Certainty that a violation occurred

However, knowingly making false reports or abusing the reporting process is not protected and may result in disciplinary action.

Confidentiality During Investigations

All investigations are handled with discretion. However, full confidentiality cannot always be guaranteed because:

- Relevant individuals may need to be interviewed
- Evidence and documentation must be reviewed

- Corrective actions may need to be taken

All employees involved in a report are expected to maintain confidentiality and avoid discussing the matter with others.

1.9 Policy Violations and Discipline

Iristel enforces this Code of Conduct fairly and consistently. Any violation of the policy may result in disciplinary action. The outcome depends on the nature and severity of the issue.

Types of Consequences

Minor or first-time violations may result in:

- Verbal or written warning
- Coaching and clarification of expectations
- Mandatory retraining

More serious or repeated violations may result in:

- Formal written warning
- Performance improvement plan or probation
- Suspension
- Demotion or reassignment

Serious violations may result in immediate termination of employment, including but not limited to:

- Harassment, discrimination, or retaliation
- Theft, fraud, or embezzlement
- Violence, threats, or unsafe behaviour
- Serious safety violations
- Intentional misuse or disclosure of confidential information
- Lying or misconduct during an investigation

How Decisions Are Made

When determining appropriate consequences, Iristel considers:

- The seriousness of the violation
- Whether it was intentional or accidental

- Whether it is a repeat or first-time issue
- The employee's past conduct and performance history
- Level of cooperation during the investigation
- The impact on employees, customers, and the business

Accountability for Everyone

This policy applies equally to all employees. Position, seniority, or performance level does not exempt anyone from accountability. Everyone is expected to follow the same standards.

Fair and Consistent Process

- Before any decision is made:
- An investigation will be completed
- The employee will have an opportunity to respond
- All relevant facts will be considered
- Decisions will be based on evidence, not assumptions

Reporting and Oversight

- HR reports policy trends and violations to leadership on a regular basis
- Serious violations are escalated to senior leadership, including the CEO or owners
- This helps ensure consistent enforcement and continuous improvement of workplace standards

Part 2: Quick Help

2.1 FAQ

Q1: Can I use company time or equipment for personal use?

A: Limited personal use is okay, but work resources are primarily for business purposes. Occasional personal emails or calls are acceptable, but you should not use company systems for side businesses, personal profit, or extended non-work activities. Always ensure your use does not impact your job performance or security.

Q2: What are my responsibilities as an employee under this Code?

A: You are expected to act with integrity, follow policies, complete required training, protect company and customer information, report concerns, and cooperate in investigations. You are also responsible for speaking up when something seems wrong and avoiding behaviour that could harm Iristel or others.

Q3: What are managers responsible for under this Code?

A: Managers are expected to lead by example, enforce policies fairly, support their teams, encourage ethical behaviour, and escalate issues to HR. They must never pressure employees to break rules or ignore concerns. Managers are also responsible for addressing issues early before they escalate.

Q4: What is considered retaliation?

A: Retaliation is any negative action taken against someone because they reported a concern or participated in an investigation. This includes punishment, exclusion, unfair treatment, reduced opportunities, or hostile behaviour. Retaliation is strictly prohibited and may result in serious disciplinary action.

Q5: Can workplace relationships create issues?

A: Yes. Personal relationships at work can create conflicts of interest or reporting concerns. If a romantic relationship involves a reporting line (for example, manager and employee), it must be disclosed immediately to HR so reporting structures can be adjusted. Decisions involving compensation, performance, or promotion must remain fair and independent.

Q6: Can I refuse to do something my manager asks if it feels wrong?

A: Yes. If you are asked to do something unethical, unsafe, or that violates company policy, you should not do it. You should raise concerns respectfully and, if needed, escalate to HR or the reporting channels. You are never required to participate in wrongdoing, even under pressure.

Q7: What should I do if I make a mistake involving company policy?

A: Report it as soon as possible to your manager or HR. Mistakes happen, and early reporting allows the company to reduce impact and fix the issue. Trying to hide a mistake is treated much more seriously than the mistake itself.

Q8: Do these rules apply outside of work?

A: Yes, when your actions could impact the company. This includes business travel, company events, remote work, or situations where you represent Iristel. Even outside normal working hours, behaviour that harms Iristel's reputation or involves company information may still fall under this Code.

Q9: Can I give or accept gifts? What are the limits?

A: Small, reasonable gifts may be acceptable, but they must never influence—or appear to influence—business decisions.

Generally acceptable: modest gifts (e.g., promotional items or small holiday gifts) and reasonable business meals.

Not acceptable: cash or gift cards of any amount, or anything that could create a sense of obligation.

Higher value gifts or anything received during contract negotiations must be disclosed and approved by your manager and/or HR. When in doubt, always disclose first.

Q10: What is a conflict of interest? Do I need to report family connections?

A: A conflict of interest happens when your personal interests could affect—or appear to affect—your work decisions.

You must disclose situations such as family members working for customers, vendors, or competitors, outside employment, financial interests in related companies, or personal relationships that could influence decisions.

Disclosure does not automatically create a problem—it allows Iristel to manage the situation appropriately.

2.2 Common Situations**Situation 1: Pressure to share confidential information**

What happened: A colleague from another department asks you to share a customer contract or pricing details “just to help them out.”

What to do:

- Politely refuse if the information is not part of your role
- Say something like: “I’m not able to share that information, but you can check with the appropriate team.”
- If the request continues or feels inappropriate, report it to your manager or HR

Why this matters: Customer and company information must only be shared on a need-to-know basis. Improper sharing can lead to loss of trust and legal risk.

Situation 2: Pressure to ignore a mistake

What happened: You notice an error in a report or customer record, but you are told to “leave it as it is” to avoid delays or complications.

What to do:

- Do not ignore or cover up the mistake
- Raise the issue respectfully: “I think this needs to be corrected so the information is accurate.”
- If needed, escalate to HR or a senior manager

Why this matters: Accuracy and honesty are required in all business records. Small errors can become bigger problems if they are not corrected early.

Situation 3: Feeling excluded or treated unfairly

What happened: You notice you are being left out of meetings or decisions that are relevant to your role, or you feel you are being treated differently without clear reason.

What to do:

- If appropriate, raise it directly with your manager in a calm, professional way
- If the situation doesn't improve or you're uncomfortable speaking up, contact HR
- Keep a record of relevant examples

Why this matters: Iristel expects a fair and inclusive workplace where employees are included based on role and responsibility, not personal bias.

Situation 4: Unsafe or concerning workplace situation

What happened: You notice unsafe behaviour in the workplace, such as blocked exits, improper equipment uses, or someone acting in a way that could cause harm.

What to do:

- If safe, address the issue immediately or stop the unsafe behaviour
- Report it to your manager or safety contact right away
- Escalate urgently if the issue is serious or not addressed

Why this matters: Safety is a shared responsibility. Issues should be reported immediately to protect everyone in the workplace.

Situation 5: Vendor offers expensive gift before a business decision

What happened: A vendor sends you a \$400 gift while your team is evaluating suppliers for an upcoming Iristel project.

What to do:

- Politely decline: “Thanks, I cannot accept high-value gifts due to company policy.”
- Inform your manager or HR about the offer
- Continue the supplier evaluation process objectively and professionally

Why this matters: Accepting expensive gifts may create a conflict of interest or the appearance of improper influence. Employees must maintain integrity and make business decisions in Iristel’s best interests.

2.3 Quick Reference Checklist

Daily Habits:

- ☐ Treat colleagues, customers, and partners with respect and professionalism
- ☐ Protect confidential information (lock screens, secure documents, avoid public exposure)
- ☐ Communicate honestly and accurately in all work-related matters
- ☐ Use company time and resources appropriately
- ☐ Ask questions or seek guidance when you are unsure

Regular Requirements:

- ☐ Complete required Code of Conduct and compliance training
- ☐ Review and sign annual policy acknowledgment
- ☐ Disclose any actual or potential conflicts of interest
- ☐ Be thoughtful before posting anything related to work on social media

When Issues Arise:

- ☐ Speak up if you notice unethical, unsafe, or inappropriate behaviour
- ☐ Do not engage in or tolerate retaliation against anyone who reports concerns
- ☐ Cooperate fully and honestly in any investigation
- ☐ Follow direction from HR, management, or compliance teams

Part 3: Framework Addendums

3.1 ISO 27001 (Information Security Policy) Quick Guide

Does this apply to you? Only if the company is pursuing or has obtained ISO 27001 certification. Check with your manager or HR if you're unsure.

What's Different for ISO 27001

ISO 27001 is an international standard for information security. If we implement it, there are a few additional requirements beyond our normal Code of Conduct:

1. You'll sign and acknowledge information security policy

As part of employment or ISO 27001 implementation, employees will sign an agreement that outlines their information security responsibilities. This includes:

- Protecting company and customer information.
- Completing required security awareness training.
- Reporting information security incidents promptly.
- Following secure work practices.
- Returning company information and assets when leaving the company.

What you need to do: Sign the information security agreement when provided by HR.

2. You'll Complete Annual Security Awareness Training

In addition to general Code of Conduct training, employees will complete information security awareness training regularly. Training topics may include:

- Recognizing phishing emails and other security threats.
- Creating and maintaining strong passwords.
- Handling confidential and sensitive information.
- Reporting lost or stolen devices.
- Working securely from remote locations.

What you need to do: Complete required security training when notified by the company.

3. Keep Your Workspace Clean and Your Screen Secure

ISO 27001 requires employees to follow clear desk and clear screen practices to protect confidential information.

- Clear Desk:
 - Don't leave confidential documents on your desk when you're not there
 - Put papers in locked drawers when you leave
 - Shred confidential documents instead of throwing them in trash
 - Don't leave USB drives or other devices lying around
- Clear Screen:
 - Lock your computer when leaving your workspace.
 - Ensure confidential information is not visible to unauthorized individuals.
 - Position screens appropriately to prevent unauthorized viewing.
 - Apply the same security practices when working remotely.

What you need to do: Make documents securing and locking your screen part of your daily work habits.

4. Report Security Problems Immediately

ISO 27001 requires employees to promptly report actual or suspected information security incidents.

Report immediately if you:

- Receive a suspicious email or phishing attempt.
- Lose a laptop, phone, USB drive, or other company device.
- Accidentally send confidential information to the wrong person.
- Notice unusual activity on your account.
- Suspect your password or credentials have been compromised.
- Observe unauthorized access or security concerns.

How to report:

- Contact the Information Security team.
- Notify your manager, who will escalate the issue as appropriate.
- Follow the company's established incident reporting process.

Do not hesitate to report potential security concerns. Early reporting helps protect Iristel's information and reduces potential risks.

3.2 Quick Compliance Checklist for ISO 27001

If Iristel implements ISO 27001, employees should:

- Sign the information security agreement
- Complete required security awareness training.
- Keep workspaces clear of confidential information.
- Lock screens when stepping away from devices.
- Report security incidents immediately.
- Follow secure password and access practices.
- Handle confidential information appropriately.

When to Get Help

Employees should contact Human Resources, their manager, or the Information Security team if they:

- Are unsure how to handle confidential information.
- Need security guidance or role-specific training.
- Experience or suspect a security incident.
- Have questions about ISO 27001 requirements.
- Identify potential security risks.

APPENDICES

Evidence Checklist

To support compliance with company policies and ISO 27001 requirements, records may include:

- Signed Global Code of Conduct acknowledgment.
- Security awareness training completion records.
- Information security agreement.
- Other required compliance documentation.

Template List

The following forms may be available from Human Resources:

- Global Code of Conduct Acknowledgment Form.
- Information Security Agreement.

Contact Human Resources if you require any of these forms or additional guidance.