

Code of Conduct

Purpose:

This Code of Conduct establishes the ethical principles and professional standards expected of all employees, subcontractors, and suppliers of Net Gain Solutions.

Scope

This policy applies to everyone working with or on behalf of any entity within the Net Gain Solutions group, including employees, subcontractors, and suppliers.

Policy Statement:

The Net Gain Solutions group is committed to maintaining the highest standards of integrity, professionalism, and ethical behaviour. All individuals are expected to act in a manner that promotes trust, accountability, and respect.

1. General Standards of Conduct:

- O Act with honesty, integrity, and transparency in all business dealings.
- O Avoid behaviour that could harm the company's reputation or undermine trust.
- Comply with all applicable laws, regulations, and company policies.

2. Respect and Inclusion:

- Treat colleagues, clients, and stakeholders with dignity and respect.
- Foster an inclusive environment free from discrimination, harassment, and bullying.

3. Health, Safety, and Environment:

- O Adhere to health and safety standards, including the Health and Safety at Work Act 1974.
- O Minimise environmental impact and support sustainability initiatives.

4. Conflicts of Interest:

- $\hbox{O} \quad \hbox{Disclose any personal or financial interests that may conflict with company responsibilities}. \\$
- O Avoid actions or decisions that could be perceived as self-serving or biased.

5. Anti-Bribery and Corruption:

- O Comply with the Anti-Bribery and Corruption Policy.
- O Never offer, accept, or solicit gifts or hospitality intended to influence decisions.

6. Confidentiality:

- O Protect sensitive company and client information.
- O Refrain from sharing confidential data without proper authorization.

7. Use of Company Resources:

- O Use company property, equipment, and resources responsibly and for intended purposes.
- Report any misuse or theft immediately.

8. Reporting Violations:

- $\circ \qquad \text{Report suspected breaches of this Code of Conduct through the Whistleblowing Policy's reporting channels.}$
- O Cooperate fully with investigations into alleged misconduct.

Responsibilities:

All employees, subcontractors, and suppliers must read, understand, and adhere to this Code of Conduct. Management is responsible for promoting and enforcing the standards outlined.

01 January 2025



Monitoring and Review:

This policy will be reviewed annually or when changes to legislation or company operations occur. Updates will be communicated to all stakeholders. For questions or further guidance, contact Ricardo Gutierrez-Inostroza at $\underline{ricardo@legacyhb.co.uk}$.