

Algospark Code of Conduct

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Introduction

This Code of Conduct represents the standards expected from staff. It is in line with the existing commitments we have made to third parties and in line with our internal policies. In the event of any breach of the rules of this Code, local law will apply. Please note, “staff” means all Algospark staff, employees and contractors.

Objective: to explain our collective responsibilities, and align our behaviours, across all locations.

International laws, regulations and fundamental principles

The behaviours defined down in this Code of Conduct fall within the framework of the fundamental principles, which Algospark has committed to observe and promote:

- Universal Declaration of Human Rights (Universal Declaration of Human Rights);
- United Nations Global Compact (the Ten Principles of the United Nations Global Compact);
- UN Principles for Business and Human Rights;
- Organization for Economic Co-operation and Development Guidelines for Multinational Enterprises (OECD Principles for Multinational Enterprises).

Algospark abides by the laws and regulations of all countries in which it does business. Algospark and its staff must not take any action that violate the laws nor cause the violation of law by failing to act. All staff are to comply with local and governmental requirements where we operate.

Work Environment

1. All staff have the responsibility to comply with the applicable laws, regulations and our internal policies on competition, employment terms, new product development, sales and marketing, as well as health or the environment.
2. To a substantial degree, the reputation of Algospark is determined by our actions and by the way each and every one of us presents and conducts him or herself. Illegal or inappropriate behavior on the part of even a single employee can cause Algospark considerable damage. All staff should be concerned with maintaining and promoting our company’s reputation.
3. Protection and use of company assets- Algospark assets are comprised of all physical goods and intangible assets owned by Algospark. They enable staff to perform their duties. The assets include for example: IT equipment, vehicles, equipment, intangible assets such as images, patents, know-how, etc. The private use of company property is permissible only where provided for by individual contract, collective agreement or company regulations, or where such use is accepted company practice. Staff must avoid any fraudulent use of Algospark’s assets and in particular protect them at their best from loss, theft, damage and misappropriation.
4. Intellectual property- forms part of Algospark’s most important assets. It includes all works of the mind and in particular industrial property. Intellectual property is protected by certain rules aimed at governing use and disclosure of these elements. Goods protected by these rules include, in particular: all technical data and documentation, software, plans, settings, know-how, manufacturing secrets, industrial drawings and designs. Staff must preserve Algospark’s intangible assets protected by intellectual property. They must also respect third party’s intellectual property. All knowledge, methods, written materials and other information relating to Algospark’s business developed as part of the employment relationship shall remain the property of Algospark.

Treatment of Clients, Business Partners and Third Parties

1. Prevention of corruption – Algospark is committed to implement and enforce effective measures throughout Algospark to prevent, detect and eliminate any potential bribery or corruption. Corruption consists in any offer, promise, donation, gift or reward, in order to induce a person holding a private or public authority, to carry out or abstain from carrying out an act pertaining to his/her office, duty, or mandate, or facilitated by his/her office, duty or mandate, or to abuse his/her real or alleged influence with a view to obtaining distinctions, employments, contracts

or any other favorable decision. Trafficking in influence consists in the direct or indirect request or acceptance of offers, promises, donations, gifts or rewards made to abuse one's real or supposed influence with a view to obtaining distinctions, employments, contracts or any other favorable decision from a public authority or administration. Algospark rejects all forms of corruption and trafficking in influence and undertakes in particular to observe the principles in the fight against corruption laid down by the OECD and the United Nations. In this respect, all staff are to commit to:

- a. never solicit money, gifts, invitations or any other advantages whatsoever
 - b. never offer, give or promise gifts, invitations or advantages of any form whatsoever to a public official or a private person in order to obtain any advantage, preferential treatment or influence in conducting a transaction or concluding a contract;
 - c. do not tolerate corruption in connection with any of our business dealings, whether direct or indirect, by, or on behalf of our staff, agents or consultants;
 - d. be aware of and gain information on the rules on combating corruption in the countries where one operates.
 - e. inform his/her line management in the event of uncertainty, requests or solicitations.
2. Customary and business gifts - Algospark acknowledges that business gestures such as gifts or invitations may contribute to maintaining good business relations with our subcontractors, suppliers and business partners. However, in some circumstances, gifts, invitations and other advantages granted may alter or influence conduct and decisions in business negotiations. Soliciting, offering and receiving advantages may be considered as corruption or trafficking in influence, and accordingly cause uncertainty regarding the integrity Algospark business practices and harm the company's reputation. Gifts offered and accepted by the staff must:
 - a. be of a reasonable and symbolic value;
 - b. be on an occasional basis;
 - c. comply with applicable laws and regulations and local customs;
 - d. be transparently recorded in Algospark's accounting records.
 - e. In case of doubt, staff are to refer to line management
 3. Purchasing policy and selection of subcontractors and suppliers - Algospark establishes fair, loyal and long-term relations with its subcontractors and suppliers. Subcontractors and suppliers are chosen based on their technical skills and service quality. Their initiatives in sustainable development are taken in account in the selection process. Algospark expects its subcontractors and suppliers to comply with applicable laws and regulations and to observe the values and principles laid down in this Code of Conduct. It is the subcontractors and suppliers' responsibility to ensure full compliance by their activities, sites, affiliates, staff, sub-suppliers/vendors of the principles set forth under this Code of Conduct. Algospark urges its subcontractors and suppliers to promote internally and within their whole supply chain the principles derived from this Code of Conduct. Algospark will regularly assess the compliance of its subcontractors and suppliers with respect to this Code of Conduct.
 4. Payment transparency - Payment transparency is an essential aspect of the prevention of corruption, trafficking in influence, and the fight against fraud. Algospark undertakes to be able to provide proof at any time regarding the source and use of any funds. In this respect, funds collected or paid are duly and fully recorded in the accounting and financial records. Algospark, and its staff refuse to use any payment method or technique that preserves the anonymity of the payer and the recipient.
 5. Fair competition - Algospark maintains loyal relations with its competitors and complies with national and international laws and regulations on anti-competitive practices in all of its operations. In particular, Algospark's staff undertake to refrain from participating in agreements in restraint of trade between competitors with a view to: deciding and fixing market prices, dividing up markets or geographical regions, excluding competitors and limiting market access;, and in general, distorting competition.
 6. Money laundering- Money laundering is a criminal offence, which consists in concealing funds derived from illegal activities. by reinvesting them in legal activities. The simple fact to execute a contract with a person having breached money laundering regulations may be qualified as money laundering. Algospark carefully selects reliable business partners, after carrying out checks, whose reputation is established and whose funds derive from legal sources. Staff must pay attention when dealing with business partners and shall report any matter giving cause to question the legality and reputation of said customers and partners.

Information Handling

1. Clients, suppliers and others disclose confidential information to Algospark for business purposes. Algospark respects the confidentiality of its clients, their operations, their data, their customers, their systems, processes, procedures, documentation and other information. It is the responsibility of every employee to protect and maintain the confidentiality of this information. Failure to protect client and third party information may damage relationships with our clients, supplier and partners and may result in legal liability.
2. Financial transparency - Algospark is committed to the transparency and integrity of our publicly filed financial reports and other communications. Algospark ensures that it maintains sound processes and internal controls so that transactions are executed according to management's authorization. Staff involved in creating and managing books and records must ensure that such books and records are complete, accurate, reflect each transaction or expenditure, and timely and in accordance with applicable accounting rules and standards whether or not the information will be included in a public filing or provided to a government agency. Such books and records include all data, certifications, other written materials provided for financial reporting, and disclosure purposes as well as materials collected for other purposes. These also include internal expense records (such as expense account reports).
3. External and Internal Communications – only authorised people can speak on behalf of Algospark. If staff receive inquiries from media or other organizations, they should refrain from responding and refer them to Algospark management. This includes print, broadcast or Internet queries. Staff should follow Algospark's corporate social media guidelines and use their good judgement when speaking about the company. Staff must ensure that all business records and business communications (including email, texts and instant messaging) are clear and accurate. These business communications may be shared or become public through litigation, government investigation, or publication by the recipient. Potential risk from inaccurate or misleading statements may include claims of misrepresentation, breach of contract, and securities law violations.
4. Protection of confidential data and Information Security Policies - confidential data protection is particularly important in view of Algospark's operations. During the performance of their duties, staff may have access to a high volume of information regarding Algospark, our customers, business partners, subcontractors and suppliers. Fraudulent use of confidential and protected information and data relating to third parties such as customers or competitors may constitute a criminal offence and lay Algospark, directors and staff open to criminal proceedings. In addition, disclosure of such information may harm Algospark's or our partners' business interests. Confidential data and information include, in particular: software, customer files, passwords, contracts and agreements, financial data, national and international development plans, merger, acquisition and sale plans, business information on prices, etc. Staff must take all appropriate measures to protect data and maintain the confidentiality of information in their possession in order to avoid inappropriate disclosure or use thereof. This obligation shall continue to apply after they leave Algospark. Staff must show discretion when using means of communication (telephones, e-mail, etc.) to share confidential information and data. In the event of doubt regarding the nature of information and the procedure for disclosing such information, staff must contact their line manager.
5. Personal data protection - Various rules govern the collection, use and disclosure of personal information and data by companies. Breach of these rules may result in considerable criminal penalties. Algospark acquires collects, processes, uses and stores personal information and data for legitimate professional purposes in accordance with applicable laws and regulations (e.g. GDPR). In addition, Algospark complies with privacy laws and regulations. Only persons whose function and duties explicitly include personal information and data processing are authorized to have access to such personal information and data.

Conflicts of Interest

1. A conflict of interest is a de facto situation where a person has interests which may influence or appear to influence the manner in which he/she performs his/her assigned duties or responsibilities. The conflict of interest may arise between each employee and Algospark, but also between each employee's family members or relatives and Algospark. Staff must not pursue interests which conflict with the interests of Algospark. Staff must take all measures to prevent and avoid actual or apparent conflicts of interest. They must pay special attention in particular when awarding a new assignment and notify their line manager in the event of doubt.

2. Competing with Algospark - an employee may not operate or assist a company that competes with Algospark or engages in any competing activities.
3. Outside Employment - Algospark expects its staff to devote full attention to their responsibilities within Algospark. Staff must notify their manager before taking on any other paid employment. Staff may not participate in an outside employment activity that could have an adverse effect on his ability to perform his duties in Algospark. Secondary activities must not be contrary to the interests of Algospark. This applies in particular to secondary employment for competitors. In addition, any employee who obtains additional outside employment, has an outside business, or is working on an invention must not use any working time at work or any Algospark's assets, or confidential information for his other job, outside business, or invention.
4. Outside Directorships - Algospark encourages its staff to be active in industry and civic organizations. However, these positions can have the potential to create a conflict of interest. Before accepting a position to serve on the board of director or advisory boards of an Algospark supplier, customer, developer, business partner or industry standards organization, an employee must first obtain approval from Algospark management.
5. Personal Investments - staff may have investments in publicly traded stock or private businesses. While these investments are generally fine, they rise to a conflict of interest if an employee is involved in or attempts to influence transactions between Algospark and a business in which an employee has a substantial economic interest. Please contact your supervisor if you have any doubts or questions.
6. Compliance with export rules - many countries have introduced trade regulations and impose export and import rules relating to physical goods and intangible assets, which are deemed to be sensitive or strategic. Algospark complies with all international trade rules and import and export controls in the countries where it operates, and in particular requirements relating to exporting military goods or dual-use items. Algospark complies with the embargo rules laid down by the United Nations and the European Union.

Protecting Staff

1. Algospark ensures that its staff have the resources required to perform their duties in a working environment that encourages professional fulfilment.
2. Human rights - Algospark adheres to the principles and values laid down in the United Nations Universal Declaration of Human Rights, which recognizes, in particular: the right for respect and dignity, the prohibition of any form of discrimination, the freedom of assembly and association, the freedom of opinion and expression as well as the right to work and equal pay for equal work. Algospark undertakes to promote application of the Universal Declaration of Human Rights in carrying on its operations. Algospark does not tolerate any form of discrimination, particularly in the recruitment process or in the workplace, based in particular on race, ethnic origin, age, nationality, country of origin, religion, gender, sexual orientation, sexual preference, disability, social origin, and any other factor protected by law. Algospark does not tolerate any form of harassment
3. Narcotic drugs and alcohol - Algospark is committed to maintaining a safe and healthy working environment for all its staff. The use of alcohol and/ or narcotic drugs by staff can undermine employee health as well as productivity and Algospark image. For these reasons, the use, possession, sale, distribution or manufacturing of prohibited narcotics is prohibited for any person while on Algospark business is prohibited. Furthermore, at work, staff are prohibited from being under the influence of either narcotic drugs or alcohol.

Protecting the Environment: Algospark's activity do not have a very large environmental impact. Whenever possible Algospark undertakes projects with a positive environmental impact.

Compliance with Code of Conduct

Non-compliance with the law and this Code of Conduct should be reported immediately to Algospark management. No employee will be penalized, demoted, suspended or discriminated against or retaliated against for reporting a potential offence or misdemeanour in good faith. Failure to comply with the principles and rules set out in this Code of Conduct may result in disciplinary action.