



Business Ethics Policy



Random_Software_Solutions

1. Policy

- i. It is the policy of Random Software Solutions (the Company) to conduct all of our business in an honest and ethical manner. We are committed to ethical business conduct in the way we interact with our employees and consultants, actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, society and the environment.
- ii. This policy has been created to provide a framework and guidance on our approach to achieving and maintaining good business behaviour. It aims to ensure that the company's ethics remain at the forefront of our business relationships, performance, public relations and reputation.
- iii. The Company will at all times demonstrate the highest levels of integrity, trust, truthfulness and honesty in order to uphold both personal and corporate reputations and to inspire confidence and trust in our actions. We expect the same standards from our suppliers, business partners and all collaborative business relationships.
- iv. The Company and all stakeholders must comply with UK laws and regulations and conduct our operations in accordance with accepted principles of good corporate governance.
- v. This policy will be reviewed periodically and revised as necessary.

2. Principles

Customers

- i. It is the policy of Random Software Solutions (the Company) to conduct all of our business in an honest and ethical manner. We are committed to ethical business conduct in the way we interact with our employees and consultants, actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, society and the environment.
- ii. The Company will take all reasonable care to avoid misleading statements, concealment, and overstatement in all of our advertising and public statements. We will seek to build long term partnerships with our customers by being honest and straightforward in our dealings at all times.

Business Partners and Suppliers

- iii. Suppliers will be chosen on the basis of factors such as price, quality, delivery, service, sustainability and integrity. The Company's choice of suppliers will be made objectively.
- iv. We are committed to relations with our suppliers, customers and business partners based on obeying the law. We aim to protect

our property (including intellectual property) and respect the property of others. In our business dealings we expect our partners to respect our business principles. Honesty and openness will be paramount in the Company's dealings with our suppliers.

Communications

- v. We will communicate openly with all stakeholders within the bounds of commercial confidentiality and regulatory constraints. We will ensure that all announcements are accurate, fair, timely and understandable, taking into account applicable standards and regulations.

Giving and Receiving Gifts and Entertainment

- vi. We will not offer, give or receive any gift, payment or entertainment which is, or may reasonably be construed as being, a bribe.
- vii. Any gifts or entertainments offered, given or received must be incapable of appearing to interfere with the impartial discharge of duties.
- viii. The Company does not make, and will not accept, facilitation or "kickbacks" of any kind.

Competitive Tendering

- ix. Our policy is to ensure that all our activities are conducted in compliance with UK competition laws.
- x. The Company will build our reputation on the basis of our performance alone. We will compete vigorously and lawfully and will not compete unfairly with others. We will not seek to damage the reputation of our competitors either directly or by implication.

Government, Regulators, and Legislators

- xi. The Company will seek to comply with all international, national, and local legislation affecting our operations. We will strive to follow the best practice in corporate governance. We will meet our tax obligations. We will not make any financial contributions or offer support to any political party.

Bribes and Corrupt Practice

- xii. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. We aim to implement and enforce effective systems to counter bribery. in all our business dealings and relationships wherever we operate. We aim to implement and enforce effective systems to counter bribery.
- xiii. The Company does not allow the direct or indirect offer, payment, solicitation, or acceptance of bribes in any form.
- xiv. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. In

particular, we remain bound by the laws of the UK in respect of our conduct both at home and abroad.

Compliance and Reporting

xv. Compliance with these business principles is essential to our business success. The Managing Director is responsible for ensuring these business principles are communicated to, and understood and observed by all stakeholders.

3. Procedure

Customer Care

i. Whenever engaging with customers it is important that all stakeholders represent the culture and business ethics of Random Software Solutions.

ii. Wherever practicable we shall observe the following guidelines:

- put our clients at the centre of our service and be responsive to their needs;
- seek to understand the requirements of our clients and their business;
- always ensure the strict privacy and confidentiality of our clients or potential clients;
- ensure our clients are treated courteously and promptly;
- deal with enquiries in a polite, friendly and helpful manner;
- act in a manner which meets the expectations of the Company and its clients;
- always admit and rectify immediately any errors or inaccuracies caused by the Company, its partners and associates;
- never sell or recommend products or services that the Company cannot support;
- never sell or recommend products or services for profit only;
- provide the means to submit comments and suggestions and undertake regular surveys of the opinions of those with whom the Company conducts business.

Gifts and Hospitality

iii. This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties if the following requirements are met:

- it is not made with the intention of influencing a third part to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;

- it complies with local law;
- it is given in the Company's name;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- it is given openly, not secretly;
- it is not offered to, or accepted from, Government officials or representatives, or politicians or political parties.

- iv. The practice of giving business gifts varies between countries and regions and the Company accepts that what may be normal and acceptable in one region may not be so in another. The test to be applied is whether, in all the circumstances, the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.
- v. When making a payment of behalf of the Company, we always remain mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. We always ask for a receipt which details the reason for the payment.

Intellectual Property

vi. We shall not misappropriate or misuse the intellectual property rights owned or maintained by another person or organisation.

Conflicts of Interests

- vii. We shall avoid personal activities and financial interests that could conflict, or be perceived to conflict, with our responsibilities to the Company.
- viii. We shall not seek gain (whether financial or otherwise) for ourselves or others through misuse of our position or the Company good name.