

Ethics Policy

PHX091

Contents

Overview	2
Purpose.....	2
Scope.....	2
Policy.....	2
Executive Commitment to Ethics Policy.....	2
Employee Commitment to Ethics Policy	3
Company Awareness.....	3
Maintaining Ethical Practices.....	3
Unethical Behaviour	3
Enforcement.....	4
Version Control	5
Document Approval.....	5

Overview

The purpose of this Ethics Policy is to establish a culture of openness, trust, and integrity to govern the business practices of Phoenix Software. Effective ethics are part of a cultural stance involving the participation and involvement of every Phoenix Software employee. All employees should ensure that they are familiar with the ethical guidelines laid out within this document.

Phoenix Software is committed to protecting the company, employees, partners, and vendors from illegal or damaging actions by individuals, either knowingly or unknowingly. Phoenix Software will address ethical issues proactively to help maintain our standing in the current marketplace.

Phoenix Software will not tolerate any impropriety or wrongdoing at any time. The Company will take the appropriate measures to act quickly to avoid or correct any issue that is ethically unsound.

Purpose

The purpose of writing an Ethics Policy is to proactively advertise and protect the consumer's and employee's expectation to be treated to fair business practices. This policy serves to guide ethical conduct during all business dealings and activities.

Scope

This policy applies to employees, contractors, consultants, and all other workers at Phoenix Software including all personnel affiliated with third parties.

Policy

Executive Commitment to Ethics Policy

The Directors of Phoenix Software must set a good example in all business practices. Honesty and integrity are the top priority for those in executive positions.

Directors and Managers adopt an open-door policy and actively welcome suggestions and concerns from employees/customers. This encourages employees/customers to feel comfortable to discuss any issues and alerts senior managers to concerns within the work force or customer base

Directors and Managers must disclose any conflicts of interests regarding their position within Phoenix Software

Employee Commitment to Ethics Policy

Phoenix Software employees must treat everyone fairly, develop mutual respect, promote an ethical environment, and avoid the intent or appearance of unethical or compromising practices.

Every employee needs to apply effort, understanding and intelligence towards maintaining our ethical values – all business transactions and advice to customers must be ethical and above board. No business transaction must ever reflect negatively on Phoenix Software.

Employees must disclose any conflict of interests regarding their position within Phoenix Software.

Employees help Phoenix Software to increase customer and vendor satisfaction by providing quality services and timely response to enquiries.

Company Awareness

An ethical approach and ethical conduct is expected within all interpersonal communications of Phoenix Software employees to colleagues and customers.

Phoenix Software promotes a trustworthy and honest atmosphere to engender and reinforce the ethical vision within the Company.

Maintaining Ethical Practices

Phoenix Software reinforces the importance of the integrity of the company ethical message at every opportunity and the tone will be set by top management. Every Director, Manager and employee needs to consistently maintain the correct ethical stance and support ethical behaviour.

Employees of Phoenix Software should encourage open dialogue, seek out honest feedback and treat everyone fairly in a responsible and objective manner.

Unethical Behaviour

Phoenix Software avoids the intent or appearance of unethical or compromising practices within relationships, actions, and communications.

Phoenix Software does not tolerate harassment or discrimination of any kind.

Unauthorised use of company data and marketing, operational, personnel, financial or technical information integral to the success of the Company is not tolerated.

Phoenix Software does not accept impropriety at any time and acts ethically and responsibly in accordance with all relevant laws.

Phoenix Software employees do not use company assets or business relationships for personal use or gain.

Enforcement

Any infractions of this code of ethics will not be tolerated and Phoenix Software will act quickly in response to the ethical code being compromised.

Any employee confirmed to have violated the guidelines within this policy may be subject to disciplinary action, up to and including termination of employment.

Version Control

<u>Author</u>	<u>Version</u>	<u>Date</u>	<u>Description</u>
Trevor Hutchinson	1.0	01/11/2019	Original Document
Trevor Hutchinson	2.0	01/11/2020	Amendments following annual review
Trevor Hutchinson	2.0	01/11/2021	Annual review – no changes
Trevor Hutchinson	2.0	01/11/2022	Annual review – no changes

Document Approval

<u>Name</u>	<u>Version</u>	<u>Date</u>	<u>Position</u>
Sam Mudd	1.0	01/11/2019	Managing Director
Sam Mudd	2.0	01/11/2020	Managing Director
Sam Mudd	2.0	01/11/2021	Managing Director
Clare Metcalfe	2.0	01/11/2022	Operations Director

Signed: *Clare Metcalfe* Clare Metcalfe, Operations Director

Dated: 01/11/2022