Falcon Workforce LLP

FALCON Code of Conduct - *Anti-Bribery, Anti-Corruption & Anti-Harassment Policy*

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1.0 Objective

FALCON Workforce LLP (FALCON) practices zero tolerance approach to bribery, corruption & harassment and are committed to act professionally and fairly in all its business dealings and relationships and in implementing and enforcing effective systems to counter bribery and corruption in any form.

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery, corruption & harassment regulations, and to ensure that the Company's business is conducted in a socially responsible & ethical manner. It provides general guidance about the Company's expectations from all executives, officers and employees globally.

2.0 Policy Statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We are focused to provide a discrimination & harassment free work environment to all along with equal opportunities to work for all. We believe in diversity and always hire employees with diverse backgrounds.

We follow fair employment practices that provide equal opportunities to all employees. We do not discriminate or allow harassment on the basis of race, color, religion, disability, gender, national origin, sexual orientation, gender identity, gender expression, age.

3.0 Scope

The Policy applies to the all FALCON employees and all third parties of any type.

"Employee" includes all directors, officers, employees, contractors, sub-contractors engaged directly or indirectly, wherever located regardless of grade and position, in terms of all dealings and transactions in all countries where the Company operates.

"Third party" means any individual or organisation who has business dealings with the Company and includes actual and potential business associates, customers, contractors, subcontractors, business partners, suppliers, distributors, business contacts, agents, technical and other consultants and government bodies and officials or any other person associated with or acting on behalf of the Company.

This policy covers:

- Bribes
- Gifts and hospitality
- Facilitation payments
- Political contributions
- Charitable contributions
- Harassments

3.1 Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor).

3.2 Gifts and hospitality

Employees must not offer or give any gift or hospitality:

- which could be regarded as illegal or improper, or which violates the recipient's policies; or
- to any public employee or government officials or representatives, or politicians or political parties; or
- which exceeds AUD 25 in value for each individual gift or AUD 500 in value for each hospitality event, unless approved in writing by the employee's manager.

Employees may not accept any gift or hospitality from our business partners if:

- it exceeds AUD 25 in value for each individual gift or INR 500 in value for each hospitality event, unless approved in writing by the employee's manager; or
- it is in cash; or
- there is any suggestion that a return favour will be expected or implied.

Where a manager's approval is required above, if the manager is below Director level then approval must be sought from an appropriate Director.

3.3 Facilitation payments and kickbacks

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to.

Our strict policy is that facilitation payments must not be paid. We recognize, however, that our employees may be faced with situations where there is a risk to the personal security of an employee or his/her family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

- Keep any amount to the minimum.
- Create a record concerning the payment; and
- Report it to your line manager.

3.4 Political Contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

3.5 Charitable contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices.

3.6 Harassments

Harassment of any kind is not all acceptable in our organization. Harassment includes harassing, bullying, using abusive language or intimidating treatment, inappropriate gestures, disorderly conduct, violence and any other conduct that interferes with a co-worker's ability to do his or her job. We must also ensure that we never verbally or physically mistreat others or engage in offensive behavior, and we should not tolerate those who do.

4.0 Responsibility of Employees

All employees should ensure that they have read and understood this Policy and must at all times comply with its requirements.

The prevention, detection and reporting of bribery, harassment and other forms of corruption are the responsibility of all those working for the Company or under its control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

Employees shall notify their Line Manager or consult the General Counsel, as soon as possible, if they believe or suspect or have a reason to believe or suspect that a breach of this Policy has occurred, or may occur in the future.

An employee who breaches any terms of this Policy shall face disciplinary action, up to and including dismissal.

The Company reserves the right to terminate a contractual relationship with third parties or associated people if they breach this Policy. The Company may also report the matter to relevant authorities.

5.0 Getting Help

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your line manager.

Report your concerns to your manager, Human Resources manager.

Any grievances relating to bribery, corruption and sexual harassment may be raised by writing to falconhr@network.com

6.0 Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing or report harassment, are sometimes worried about possible repercussions. The Company encourages openness and supports anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. If a violation of the relevant laws or policies is proven, appropriate action shall be taken.

The Company is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption or harassment, or because of reporting in good faith their suspicion that an actual or potential bribery or harassment offense has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern.

7.0 Training and Communication

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis.

Our zero-tolerance approach to bribery, corruption & harassment must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

8.0 Who is Responsible to Ensure Compliance with the policy

The Board of Directors of the Company shall have the overall responsibility for ensuring this Policy complies with our legal and ethical obligations and that all those under our control comply with it.

Line Managers at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy and are given adequate and

regular training on it. Every person to whom this Policy applies is responsible for the success of this Policy and shall ensure that they use it to disclose any suspected activity or wrong doing.

9.0 Monitoring and Review

The management steering committee shall monitor the effectiveness and review the implementation of this Policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified shall be made as soon as possible. Internal control systems and procedures shall be subject to regular audits to provide assurance that they are effective in countering bribery, corruption and harassment.