Code of Conduct

All companies have a legal obligation to advise their employees of any disciplinary rules which apply. Notwithstanding this, we have attempted to keep such rules to a minimum to demonstrate trust in our staff and confidence that normal standards of behaviour will prevail through self-discipline rather than through a rigid application of rules.

The rules we do have, therefore, are for a practical purpose and are in addition to the expectations which society in general has regarding acceptable behaviour. The aim is to promote efficient and safe working.

Attendance and timekeeping

Should you need to be absent or expect to be late for any reason, you should ask your manager in advance when possible. If this is not possible, please contact your manager at the earliest opportunity, and not later than 9.30am, to explain your circumstances.

Flexibility

To meet the demands and nature of the business and customers, employees should be prepared to transfer upon request within a department or from one department to another, either temporarily or permanently, to undertake work of a different nature, providing it is reasonable and safe to do so and the employee is adequately trained. When any such transfer is made there will be no reduction in the rate of pay of the employee transferred, apart from exceptional circumstances (such as downgrading through lack of ability, ill health, or redeployment as an alternative to redundancy). If the transfer is one to a higher position, the appropriate rate will apply. Note: the company reserves the right to add to or amend these rules should circumstances require this.

Smoking

In Summer 2007 the Health Act 2006 came into effect which prohibited smoking in certain premises, places and vehicles including all places of work and vehicles used whilst carrying out duties associated with employment. In addition, under Section 2(2) of the Health and Safety at Work Act 1974, Hornbill as an employer has a duty of care to provide and maintain a safe working environment. To comply with these pieces of legislation, Hornbill operates a No Smoking policy on its premises and in any vehicle that belongs or is leased to it.

Restrictions on smoking

In the UK Smoking is not permitted at any time by any person working for Hornbill in any part of the premises leased by the organisation or at its entrances. This includes spaces like meeting rooms, lifts, corridors, stairways, lavatories, rest rooms, reception areas or entrances. Any employees who do smoke, may only smoke in their designated meal breaks - unless otherwise agreed by their line manager - and away from the Hornbill premises and entrances (complying with the Health Act 2006 restrictions on smoking in public places).
In Albania smoking is not permitted at any time by any person working for Hornbill in the Tirana office. Smoking is permitted on the Tirana office balcony.

Visitors

All visitors to Hornbill are required to abide by the smoke free policy. It is the responsibility of all employees to ensure they inform their visitors of the policy.

Vehicles

Smoking is not permitted in vehicles belonging to or leased by Hornbill or in employees' private vehicles if they are being used to carry employees or members of the public whilst carrying out duties associated with their employment. Hornbill Employees must respect the no smoking policies of any customer or 3rd parties premises when attending on behalf of the company.

Support for smokers wishing to stop

For any employee who wishes to stop smoking, the NHS Smoking Helpline can offer advice and support – telephone 0800 022 4 332 or visit www.smokefree.nhs.uk.

Alcohol and illegal drugs

Hornbill understands that the use of alcohol and drugs has the potential to impair an individual's ability to carry out duties safely, efficiently, and effectively and to damage the health and quality of life of the individual concerned. Impaired ability may jeopardise the safety of the individual, other employees and customers and will also impair the ability of Hornbill to fulfil its commitments to its customers. This policy is designed to prevent drink and drug related problems affecting employees and to provide help to those affected.

Employees must:

- Not attend work with an alcohol level that will either impair their performance at work or greater than the legal limit allowed to drive.
- Bring to the attention of a member of the Management Team if they are using over the counter or prescribed medicines by their doctor or specialist which may potentially impair their work performance.
- Not buy, sell, possess, or take non-medical drugs on Hornbill's premises.

- Bring to the attention of a member of the Management Team, any situations where they have reasonable cause to believe that the performance of a fellow employee is impaired due to alcohol or drugs.

Provision of support

Hornbill recognises that alcohol and drug related problems may develop for a variety of reasons; however, they will have a significant impact on the individual's life and their ability to carry out their role safely and effectively. In most cases, alcohol and drug problems are treatable and accordingly, the company encourages individuals experiencing such problems to seek help and treatment. Employees are encouraged to discuss any alcohol and drug related problems with a member of the Management Team in order that, where possible, Hornbill can provide support to facilitate any treatment with a view to the individual achieving a full recovery and thereby allowing them to return to work.

Disciplinary action

Alcohol and drug misuse may become a matter that is handled under the Hornbill Disciplinary Procedure, particularly where a sustained alcohol or drug abuse problem has not been identified; there are no mitigating circumstances; support and treatment is refused, ignored or unsuccessful; impaired performance continues; or professional relationships are compromised.

Security

Aspects of our product and processes. business strategy and other corporate are secret and must not be divulged to non-employee, or to other employees unless there is a requirement for them to have such knowledge to conduct their duties. Similarly, you must not remove any company documents, books, records, drawings, magnetic or other storage media from the site without due permission. Breach of this regulation will render you liable to summary dismissal. The company reserves the right to search the outer clothing, bags, lockers, and vehicles, etc of employees whilst on site. The employee may have a colleague in attendance on such occasions. Alarm password and door keys will be issued to staff as appropriate. All employees will be issued with a personal access fob, these must be used to gain entry to and exit from the offices. Information gathered from the access security system may be used by your manager to monitor entry and exit times.

Software protection and copyright materials

All Software in use by employees is either Hornbill Copyright or supplied to the Company under licence or Software as a Service agreement, which prohibits its transmission to third parties without payment to the copyright owner.

No employee may make or receive copies of any software without their manager's permission. No software may be copied, or copies received, which are in breach of the Company's or other party's software copyright. No employee shall download from the Company internet connection to any computer or device or store on any Company owned equipment any copyright material to which the employee or the company does not have a valid current license. This includes but is not limited to the downloading of music and moving images in whatever format or file structure from file sharing sites and storing resultant files on Company equipment. Breach of this policy is a serious disciplinary offence and may result in dismissal.

Misuse of computers

Under the terms of the Computer Misuse Act 1990 it is a criminal offence to interfere with a company's computer or the data stored thereon. An offence is committed by unauthorised access, conduct which could lead to the commission of a further offence, i.e., supplying information to a third party for their advantage, and

by unauthorised modification of data. Employees owe a duty of care to Group company clients and must obtain the necessary authorisation from a client if they need to change that client's system or the data stored thereon.

Data Protection Act

Employees are reminded of the provisions of the Data Protection Act 2018 relating to the storage and disclosure of personal data, that is data relating to a living individual. The Company and its employees are therefore required to exercise tact, diplomacy and confidentiality when dealing with personal data. No unauthorised disclosures will be allowed by the Company. Employees wishing to keep databases containing personal data must only do so in accordance with Company procedure.

Information Security Management

At Hornbill, we are committed to the highest standards of information security, confidentiality, integrity, and availability. To ensure these values are upheld, we maintain a robust Information Security Management System (ISMS) in accordance with ISO/IEC 27001:2022.

Under this framework, we:

1. Establish, implement, maintain and continually improve our information security policies, processes, and controls to manage risks to our information assets.
2. Ensure that roles and responsibilities for information security are clearly defined and understood across all levels of the organization.
3. Identify internal and external risks that could impact the security of information, assess their significance, and apply appropriate controls for risk treatment.
4. Protect information in all its forms—electronic, physical, and verbal—against unauthorized access, disclosure, alteration, loss or damage.
5. Promote awareness, training and accountability among all employees, contractors, and third-party partners in fulfilling their information security obligations.
6. Monitor, measure, audit, and review our security processes to verify effectiveness, drive continual improvement, and respond to changing threats.
7. Ensure compliance with relevant legal, regulatory, contractual, and stakeholder requirements regarding information security.

All employees are required to follow the policies and procedures set out in our ISMS.
By adhering to ISO/IEC 27001:2022, we aim not only to safeguard Hornbill's data and systems but also to build trust with our customers, partners, and stakeholders through transparency, responsibility, and excellence in information security.

Personal appearance

We regularly receive visits from customers, potential customers, and others, and naturally wish to convey an impression of efficiency and organisation. Therefore, all staff are required to be neat and tidy in appearance and whenever they have direct contact with customers or other third parties, employees must look smart and well groomed.

Personal phone calls

Employees have a fundamental duty to the company to keep costs to a minimum and to devote all their available working hours to the performance of their duties. As a part of this all employees are expected not to make personal phone calls from the office except where absolutely necessary and are not permitted to make

any personal international or premium rate calls. Equally, you should discourage incoming personal phone calls. If you have any questions regarding this policy, please speak to your manager. Those of you that have a company mobile phone will be aware that all use is monitored.

Confidentiality

We are in a highly competitive industry. It is vital that our plans, progress, and results remain confidential. You are referred to the clause in your contract of employment relating to confidentiality.

Any company information other than that contained in authorised and publicly available documents must be kept confidential unless the company's prior written consent has been obtained and a formal confidentiality agreement signed by both parties.

We cannot emphasise strongly enough the requirement for confidentiality regarding our business. All employees are requested to refrain from casual discussion about product development, sales methods, or any other aspect of our business. This includes discussion with former employees who often remain within the industry.

You must not use such information for the benefit of any future employer. This requirement of confidentiality exists both during and after your employment and the company will take a very serious view, possibly culminating in legal action, should any employee breach this confidentiality.

Outside interests

You may not engage in any outside activities or undertake any work outside the company, whether paid or unpaid, which might conflict with this company's interests.

Documents

As well as the terms and conditions of employment contained in this section, the following form part of your terms and conditions of employment:

- Your offer of employment letter
- Your Statement of Employment
- The company car allowance policy, where applicable
- Annual bonus / commission terms agreed by Hornbill from time to time, where applicable