

NETWORKING CULTURE LTD

CORPORATE SOCIAL RESPONSIBILITY POLICY

Networking Culture Ltd seeks to be a good corporate citizen in everything that it does.

The principles encompassed in this policy cover all areas of the company's operations and have been developed and continue to be reviewed against and updated by reference to relevant codes of corporate governance and international standards.

The Directors support the principles set out in those codes and standards and the aim of this policy is to translate that support into a set of guidelines and standards that set a common approach for the Company and provide practical guidance for our employees.

Compliance, monitoring and reporting

Compliance with this policy will be monitored and subject to review on a regular basis by the Directors of Networking Culture Ltd.

All sections of this policy are underpinned by the Company's Code of Business Ethics, which is set out in Section 1. The other areas covered by this policy are:

- Section 2 Safety and Security
- Section 3 Employment
- Section 4 Customer and Community
- Section 5 Environment

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SECTION 1

CODE OF BUSINESS ETHICS

This code applies to all of the operations of Networking Culture Ltd and sets out the minimum standards which the company expects from staff in their internal and external dealings with colleagues, customers, stakeholders and third parties.

1.1 Basic Standards of Conduct

(a) We will conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, customers and third parties.

(b) We will respect the legitimate interests of third parties with whom we have dealings in the course of our business.

(c) We will maintain the highest standards of integrity – for example, we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.

1.2 Employees

The Company:

(a) is committed to creating and maintaining a safe and healthy working environment for its employees.

(b) will strive to create a workplace in which there is mutual trust and respect and where every person feels responsible for the performance and reputation of our company.

(c) will respect the individual and each other's rights, customs and traditions.

(d) will work towards achieving a diverse workforce, recruiting, employing and promoting employees only on the basis of objective criteria and the qualifications and abilities needed for the job to be performed.

(e) will maintain good communications with employees through our information and consultation procedures.

(f) will assist employees in realising their potential.

1.3 Customers

(a) The Company is committed to providing safe, value for money, high quality, consistent, accessible and reliable services to its customers.

1.4 Business Partners and Stakeholders

(a) We aim to develop strong relationships with our suppliers, stakeholders and others with whom we have dealings, based on mutual trust, understanding and respect.

(b) In those dealings, we expect our partners to adhere to business principles consistent with our own.

(c) The Company will conduct their operations in accordance with the principles of fair competition and applicable regulations.

1.5 Compliance with Law

(a) All members of the Company will comply with the laws and regulations applicable wherever they do business. Appropriate training will be provided for employees as necessary.

1.6 Business Integrity

(a) The Company shall not offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain and no employee may offer, give, seek or receive any gift or payment which is, or could be construed as, such. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with one of the Directors.

(b) No undisclosed or unrecorded account, fund or asset will be established or maintained.

(c) The Company will not facilitate, support, tolerate or condone any form of money laundering.

1.7 The Environment

(a) The Company is committed to making continuous improvement in the management of its environmental impact.

(b) We will work with our partners to promote environmental care and increase understanding of environmental issues.

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1.8 Community Involvement

(a) The Company strives to be a good corporate citizen and to fulfil our responsibilities to the societies and communities in which we operate.

1.9 Conflicts of interest and confidentiality

(a) Whilst the Company respects the privacy of its employees, all employees are expected to avoid personal activities and financial interests, which could conflict with their responsibilities to the Company.

(b) Employees must not seek gain for themselves or others through misuse of their positions or company property.

(c) All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) should be disclosed to and discussed with the Directors.

(d) Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given.

(e) Where information is confidential, that confidentiality must be respected.

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SECTION 2

SAFETY AND SECURITY

2.1 Safety

The health and safety of our employees and customers is our paramount concern. Safety underpins all our operations and our central motto is “If you cannot do it safely, don't do it”.

We have developed the following high-level health and safety policy, which underpins all of our operational health and safety policies:

(a) General Statement

The Directors are committed to ensuring, so far as is reasonably practicable, the health, safety and welfare of all of its employees at work and also the safety of customers and others.

(b) This policy seeks continuous improvement and compliance with legislation, having proper regard to the protection of people, premises, property and the environment. It is based on the principles that:

- All injuries can be prevented
- The goal is zero injuries
- Safety is the responsibility of all employees
- Working safely is a condition of employment

(c) The Directors are tasked to ensure that so far as is reasonably practicable:

- There are adequate arrangements and organisation for health and safety in place.
- All staff are given appropriate information, instruction and training
- All other legal and statutory duties on health and safety incumbent upon the Company are complied with in all their operations and locations.

(d) We will continually monitor the health and safety performance of our Operations.

2.2 Security

(a) General Statement

Security is a key issue for our customers, our staff and our business. We recognise the range of security issues which can arise and have implemented the following high level security policy.

(b) The Directors of Networking Culture Ltd are committed to ensuring, so far as is reasonably practicable, the security of our customers and employees.

(c) The threats to security are wide ranging, significant and, in the main, driven by external influences. The ability to control risks varies. However, we strive to address or mitigate all of the threats which apply.

(d) We aim to achieve, so far as is reasonably practicable:-

- A secure environment for customers using our services
- A secure environment for staff in their work
- Security of our property
- Security of our systems and processes

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SECTION 3

EMPLOYMENT

3.1 Equal Opportunities and Diversity Policy

a) The Directors of Networking Culture Ltd are committed to equality of opportunity both in the provision of services to the public and as an employer. This policy sets out Networking Culture Ltd's commitment to treat equally and with fairness at all times its employees, customers, contractors and those who come into contact with the company.

(b) We are committed to seeking continuous improvement and compliance with legislation based on the following principles.

- Everyone has the right to be treated with dignity and respect.
- We will not discriminate on the grounds of race, gender, disability, nationality, religion, philosophical belief, political belief, age, sexual orientation, family status, trade union activity or any other factor.
- We will adopt fair and inclusive practices throughout our operations and will seek to eliminate all prejudice, discrimination, bullying and harassment.
- All employees have a personal responsibility for the practical application of this policy in their day-to-day activities and must support the policy at all times.
- Non-compliance with this policy will be treated seriously and will not be tolerated.

Legislation and Codes of Practice

(d) We will comply with current national and international legislation and relevant codes of practice in the countries where we operate. We will monitor our compliance with this policy and the requirements of relevant underpinning legislation as appropriate.

Partner Organisations

(e) We are committed to actively working with partner organisations to ensure our policies, procedures and practices are in line with best practice.

Access to Information

(f) We will seek to ensure that information is made available to our customers and employees in alternative formats as required.

Recruitment

(g) All recruitment will be carried out with regard to fairness, equality and consistency for all candidates at all times. Recruitment practices will be inclusive and we will endeavour to ensure there are no barriers to employment of suitable candidates.

Staff Training

(h) We will provide our staff with the necessary guidance and training to ensure the effective implementation of this policy and to ensure we are an inclusive employer and service provider.

Complaints

i) Any employee who feels that he or she has grounds for complaint in relation to bullying, discrimination, harassment or victimisation has the right to pursue the complaint. Customers who feel they have grounds for complaint may pursue these with our Directors.

3.2 Human Rights

Networking Culture Ltd supports the principles of the United Nations Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. We will adhere to the following principles in respect of our staff.

a) We will treat all employees fairly and honestly, regardless of where they work. All staff will have agreed terms and conditions in accordance with local law or practice and will be given appropriate job skills training.

b) We will pay a fair wage reflecting local markets and conditions. We will always meet any national minimum wage.

c) Working hours shall not be excessive. They shall comply with industry guidelines and national standards where they exist.

d) We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour.

e) We will abide by the non-discrimination laws in every country where we operate.

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f) We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse.

3.3 Data Protection

We will comply with the relevant principles governing data protection in each country in which we operate.

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SECTION 4

CUSTOMER AND COMMUNITY

4.1 Customers

We will:

- act in accordance with fair business, marketing and advertising practices and take all reasonable steps to ensure the safety of our services
- provide effective procedures that address customer complaints and contribute to fair and timely resolution of disputes
- not make representations or omissions nor engage in any other practices that are deceptive, misleading, fraudulent or unfair
- respect customer privacy and provide protection for personal data in accordance with the relevant local law

4.3 Suppliers

Ethical Purchasing Policy

(a) We purchase a wide range of goods and services required in the operation of our business. Good working relationships with our suppliers are therefore central to the success of our business. For this reason, we clearly state our purchasing policy as part of ensuring that our business standards are integrated throughout the supply chain.

(b) We are committed to obtaining and retaining competitive goods and services while at the same time ensuring they are from sources which have not jeopardised human rights, safety or the environment.

(c) We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect.

(d) We will seek to work with our key suppliers to:

- Develop long-term meaningful relations to the benefit of both parties.
- Improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties.

4.4 Community

We shall encourage dialogue with local communities for mutual benefit. We seek to play our part in promoting socially inclusive policies, encouraging the young and disadvantaged and helping older members of the community and the disabled.

In line with our core values, our community strategy incorporates the following elements:

- Promoting engagement between our staff and the community;
- Supporting local community groups and charities;
- Improving the environment in and around our operations;
- Supporting local initiatives for the development and education of young people;

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SECTION 5

ENVIRONMENT

5.1 Environmental Policy

Our policy is to minimise the environmental impacts of our operations.

We are committed to:

- preventing pollution and reducing the overall impact of our operations on the environment.
- complying with applicable legal and other requirements relating to the organisation.

Gwenllian Rhys **CEO**

Peter Rawlinson **Director**