

## Statement of Professional Practice

Freshtel Holdings Ltd and subsidiary companies (Freshtel) requires very high standards of personal integrity and conduct which requires absolute honesty. These guidelines should be understood and observed by all employees, contractors and sub-contractors of Freshtel and its related entities. In performing your duties you should keep uppermost in your mind the need to use common sense. If you always act honestly, exercise common sense and are never afraid to ask for help if you are unsure of how to act, you will not encounter any problems in observing the principles contained in this document.

### Business of Freshtel

- You should protect and develop the business of Freshtel through prompt and efficient service to customers and prospective customers.
- You should comply with the law in all your activities.
- You should actively support Freshtel's policies regardless of personal views.

### Dealing with customers and Avoiding Conflicts of Interest

- You should avoid placing yourself in a position where you may stand to benefit, even indirectly, from a transaction between Freshtel and another party. Where there is any likelihood of such conflict arising you should make full disclosure to Freshtel and obtain Freshtel's approval prior to acting.
- You should ensure that your personal relationships with customers do not influence or prejudice your obligations to Freshtel. In particular, you should not accept commissions and should use commonsense regarding gifts or hospitality from customers. If a gift, payment or entertainment is offered that could be construed by others as improper, the offer must be reported to the Company Secretary, the Chief Executive Officer or a Director of Freshtel.
- You should not use information obtained in the course of your employment or contact about Freshtel's affairs or those of customers for your own gain, that of others or for any other purpose.

### Misuse of communication facilities

- You should not misuse Freshtel's technology and communication facilities in any unlawful, inappropriate or offensive manner.

## **Equal Opportunity Employment**

- Discrimination and sexual harassment in the workplace are illegal and are not acceptable to Freshtel.

## **Confidentiality and Public Statements**

- You should treat all affairs of Freshtel, its customers and fellow employees and contractors with absolute secrecy. This obligation continues should you leave Freshtel.
- You should not, unless specifically authorised, give interviews to the media or make public statements on any aspect of Freshtel or its operations or any information about its customers.

## **Honesty**

- You should be absolutely honest in all your professional activities. Stealing, unauthorised borrowing, misappropriating money or property to private use, unauthorised access to information and fraudulent acts generally, are criminal offences.
- You should report any knowledge of fraud, error or breach of law or concealed practice which may be detrimental to the interests of Freshtel. Freshtel will do everything it reasonably can to protect employees or contractors reporting such matters against unfair treatment.

## **Personal Standards and Finances**

- You should adopt personal standards consistent with the high reputation of Freshtel and endeavour at all times to enhance the standing of Freshtel.
- You should manage your personal finances in a prudent manner and take care not to overcommit yourself.
- If you are experiencing any personal or financial difficulties, you should never hesitate to discuss them with your manager.

## **Outside Employment and Appointments**

- You may obtain supplementary employment or occupations outside Freshtel, or hold honorary positions in clubs, charitable organisations etc, provided that performance of your Freshtel duties is not affected adversely, such employment

or occupation does not in any way reflect adversely on Freshtel and does not conflict with your duties to Freshtel.

- Any outside directorships of commercial organisations should be disclosed to Freshtel and should only be held where there is no possibility of conflict or adverse effect on your duties to Freshtel.

**Any breach of this Statement of Professional Practice constitutes misconduct and employees may face disciplinary action including termination of employment and/or legal action. If you are in difficulty or have any questions about this Statement you should approach your Manager.**