



OPENeLMS

Code of Conduct

1 Foreword

from Managing Director

At Open eLMS we are not solely in business to make a profit, we also aim to make a difference. Our code values of honesty, fairness and inclusion are inherent in what we supply and how we treat people (clients and employees).

Open eLMS walks the walk - we practise the right thing to do because it is the right thing to do. This is manifested in such activities as immediate supplier payments and profit share with our employees.

I'd like you to read through this code of conduct and think about how it applies to your role. Are you honest in your dealing with others and yourself? Are you fair to your clients and fellow employees? And are decisions you are making free from bias - unconscious or otherwise?



Emil Reisser-Weston (Managing Director)

Thank you for your time, it is precious and we value it.

2 Objective

The purpose of this policy is to outline acceptable conduct at Open eLMS. These rules are in place to protect employees, Open eLMS and our customers. Inappropriate conduct exposes every employee and Open eLMS to risks including services being compromised, legal issues, and breaches of trust with our learners and customers.



3 Overview



The company is committed to protecting Open eLMS users (whereby user means any employee, contractor, consultant, temporary workers and other individuals having access to the Open eLMS network/systems) and the company from illegal or damaging actions by individuals, either knowingly or unknowingly.

Conducting business responsibly is a company-wide effort involving the participation and support of every Open eLMS user and affiliate who deals with our systems. It is the responsibility of every associated person to read and understand these policies, and to conduct their activities accordingly.

4 Scope

This policy applies to any individual who conducts Open eLMS business or interacts with internal networks and business systems, clients or suppliers, whether owned or leased by Open eLMS, the user, or a third party.

All employees at Open eLMS and its subsidiaries are responsible for exercising good judgment regarding appropriate use of information, electronic devices, network resources and good judgement regarding behaviour, including discriminatory or otherwise illegal conduct in accordance with Open eLMS policies and standards, and local laws and regulations.

This policy applies to all users at Open eLMS including all personnel affiliated with third parties.



5 Code of Conduct

5.1 Fair Treatment of Employees

Open eLMS believes in the power and value of a globally diverse and inclusive culture, underpinned by respect, integrity and ethical behaviour. In practice, this means:

5.1.1 Anti-discrimination and harassment prevention

Employees will be treated fairly and with respect, especially in light of their contributions. Equal opportunities are central to this ethos, and employment decisions will be based on merit, qualifications, skills and achievements.

Any discrimination on the basis of age, gender (or gender identity), race, ethnic background, sexual orientation, national origin, disability or religious beliefs will not be tolerated. This is applicable for all employees, vendors, customers or temporary workers and to interactions within the business, and those that are outward facing.

Harassment is unwelcome or offensive conduct that may interfere with a person's ability to perform their work - it does not require intent to offend to be classed as such. For full details please see the Anti Discrimination Policy.



5.1.2 Safe and healthy work environment

Open eLMS is committed to providing a safe environment for employees, business partners, vendors and visitors within our premises. Employees should also take care to ensure they are working in a safe manner when conducting business elsewhere.

To this end, every employees is responsible for making health and safety a priority by ensuring:

1. All unsafe or hazardous conditions should be promptly reported to supervisors.
2. All applicable laws, regulations, standards and policies should be complied with, including those concerned with hours, wages and working conditions.
3. All applicable workplace safety and industrial hygiene policies, laws, regulations, and standards are complied with.

Consequently, employees must not:

4. Undertake work or work-related activity whilst under the influence of alcohol
5. Carry on with any work which becomes unsafe or unhealthy once started
6. Assume someone else will report a risk or concern

5.2 Financial Integrity and Countering Corruption

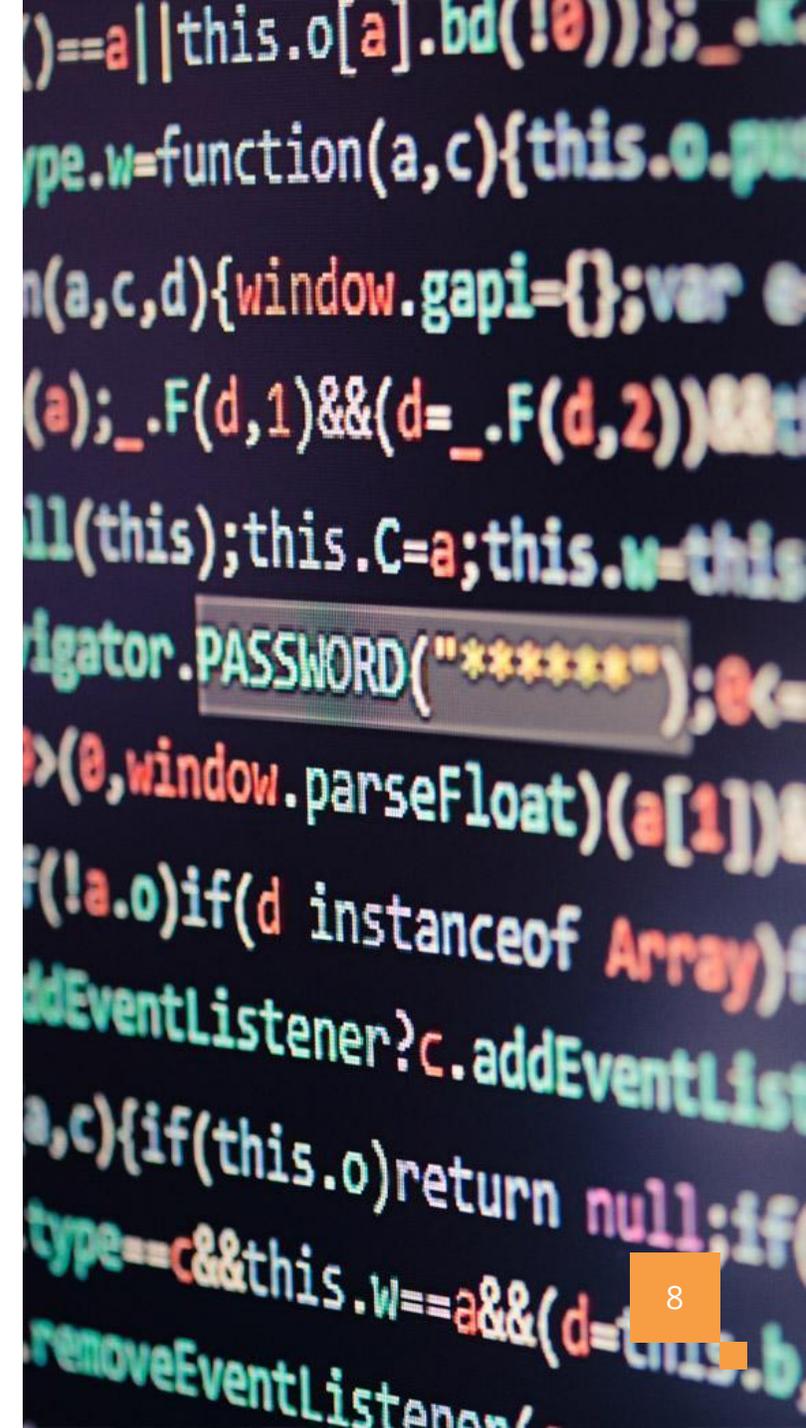
5.2.1 Financial Integrity & Intellectual Property

Open eLMS is a business that provides learning services for its clients, using systems and techniques that may or may not be in the public domain. The company's intellectual property and confidential information are irreplaceable assets which must be secured and protected against malign use or theft.

To protect the financial integrity of the business, employees and affiliates must ensure adherence with the relevant policies that are put in place for this purpose. These are:

1. Password Policy
2. Supplier Security Policy
3. Data Protection and Information Security
4. Information Classification Policy
5. Social Media Policy
6. Security Incident Management Policy

Internal training is also provided to foster an environment of continuous improvement when it comes to protecting our IP and data.



5.2.2 Corruption and Conflicts of Interest

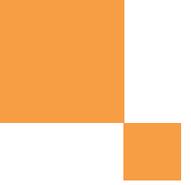
Conflicts of interest can have a significant negative impact on Open eLMS and its ability to conduct business.

Conflicts of business can be divided into three categories - actual, perceived or potential conflicts. It is paramount that any occurrence that meets these criteria be immediately reported to the appropriate management.

The following criteria are just cause for reporting a conflict of interest:

1. A family member or close personal contact who is a public official.
2. A family member or close personal contact who works for, or provides services to actual or potential competitors, customers and suppliers.
3. Substantial interest (beyond 5% of total net worth) in a competitor, supplier or customer.
4. Any interest in a supplier if you, or a member of your team are involved in selecting, assessing or negotiating with said supplier.
5. Any interest in a customer if you, or a member of your team are involved in selecting, assessing or negotiating with said customer.





Consequently, employees **must not:**

1. Take or divert business opportunities which arise in the scope of performing their role at Open eLMS that could be of interest to the company.
2. Allow personal, financial or political activities to affect (or perceived to affect) they way in which the perform their role
3. Work or provide any services to competitors, customers or suppliers without prior written approval.

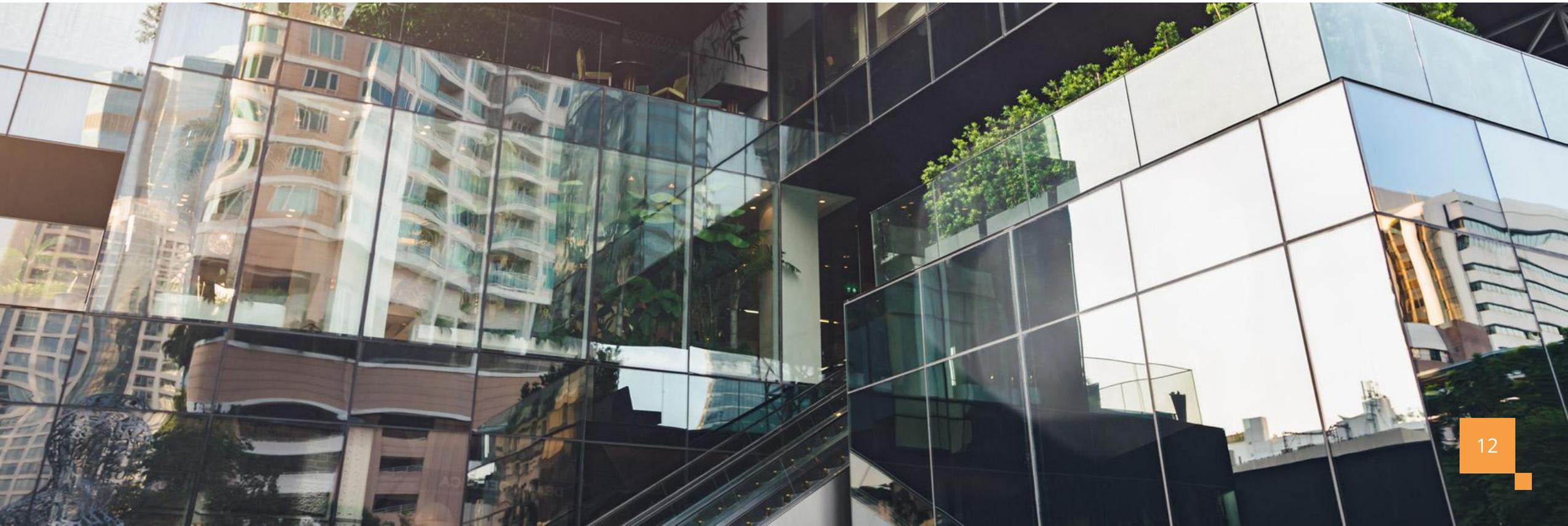
The above list is not exhaustive and employees should always exercise good judgement. If you are unsure if your situation constitutes a conflict of interest, please ask management for clarification.

Employees, vendors and third party contractors should all be aware that Open eLMS operates a zero tolerance approach to any instance of corruption or bribery.



6 Corporate Social Responsibility

Just as Open eLMS expects a code of conduct from its employees, it also sets out parameters for its own outward facing conduct. Corporate Social Responsibility is a set of behaviours and actions which ultimately make our business more conscientious, impactful, and sustainable for our clients, suppliers and the wider communities in which we operate.



6.1 Environmental Efforts

As climate change becomes a larger theme in the public domain and our personal lives, Open eLMS wants to do all that it can to reduce the impact on the environment the business incurs in its day-to-day running. Being paperless enables us to significantly reduce our part in deforestation trends around the globe (as well as having significant security advantages) - all employees should remain mindful of the paper which they use, and consider if something really must be printed before doing so. Furthermore, any paper should be recycled where possible, unless it requires secure disposal. Electrical consumption should also be a focus of reducing our environmental impact. At the end of each day, please ensure that your computer is turned off, including the monitors, and that all lights are switched off when not in use.

Open eLMS tries whenever possible to schedule web meetings using Zoom or Teams rather than travel to clients' premises. The company has invested in web conferencing to make this as smooth an experience as possible.

Open eLMS is a net carbon reducer and to this end offset the carbon via donations to a tree planting scheme. The company has set up a scheme to plant trees to offset 5,000 Kg of carbon every month (far and above the 2,984 Kg emitted by the business in 2021).



6.2 Community Impact

Open eLMS wants to be a positive force within its local community, and support local organisations where appropriate. Sport can be a great way to increase your physical health and mental wellbeing, whilst simultaneously fostering social networking and team skills. For this reason, we're proud to be sponsoring the Shinfield Cricket Club, a local team with many members from the Maidenhead area.

If you know of an organisation seeking sponsorship from local businesses, please voice your idea to the appropriate management.

6.2 Community Impact

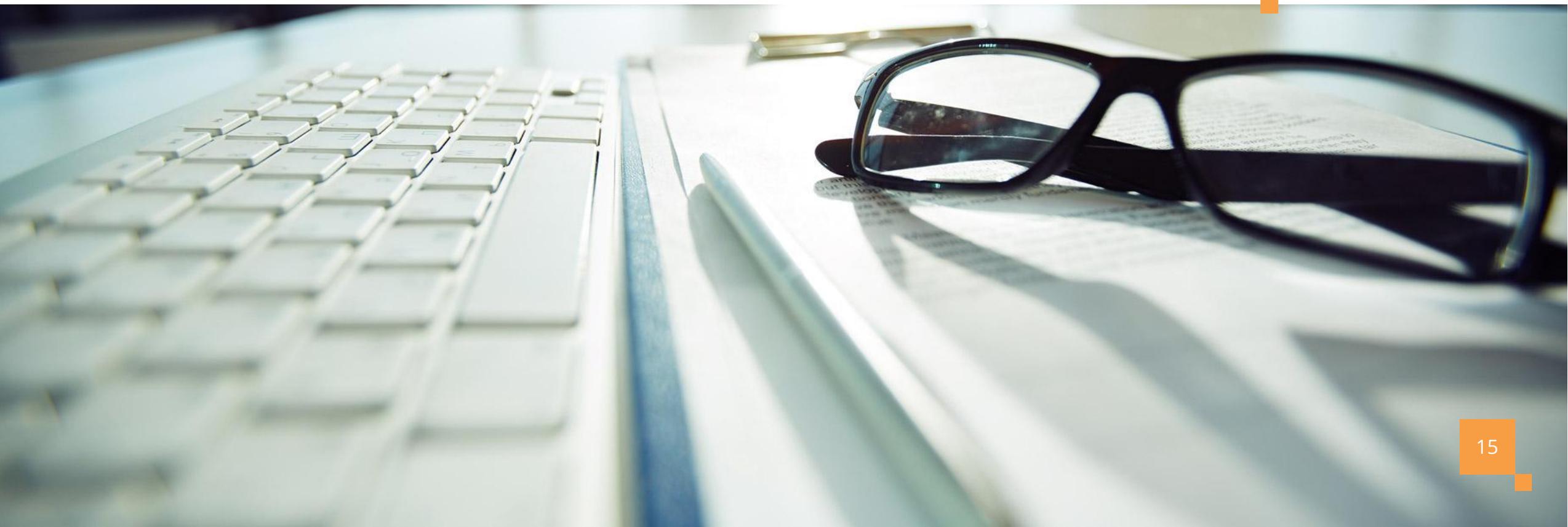
Marketing can make or break the trust of clients - for this reason, we insist that our marketing efforts be conducted with integrity, responsibility and transparency. This means marketing must:

1. Adhere to applicable marketing laws
2. Describe products and their benefits truthfully and transparently
3. Reflect and respect generally accepted contemporary standards of good taste and decency
4. Consider the environmental impact of marketing efforts (e.g. no free corporate give-aways which are rapidly disposed of.)



7 Additional Policies and Standards

Additional Open eLMS policies all users must be aware of, and comply with, are available internally to all employees and can be provided upon request to clients.



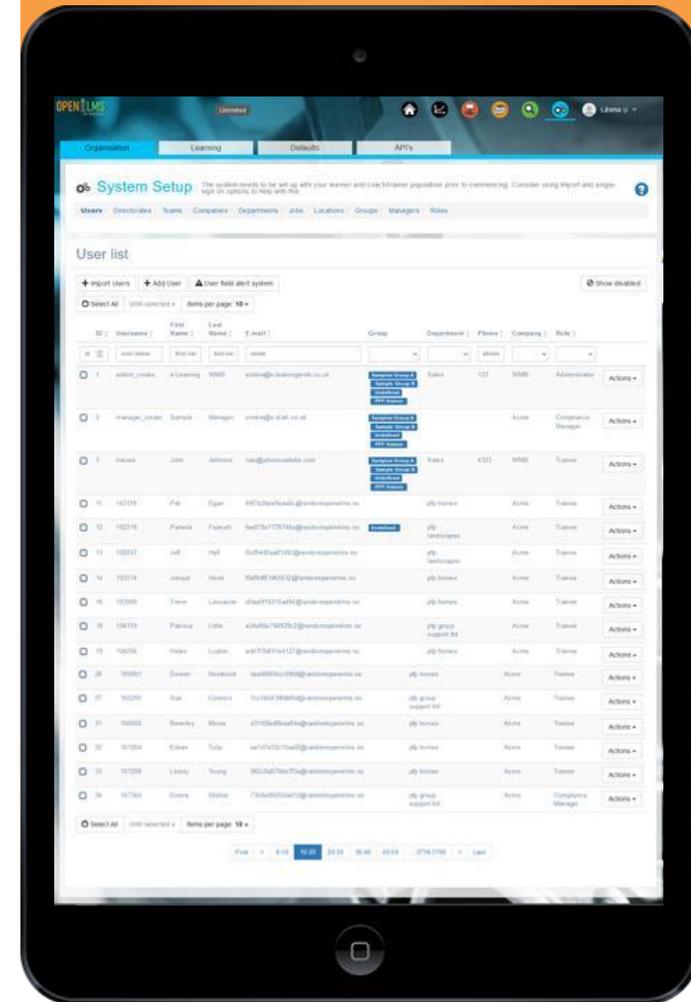
8 Sanctions

Open eLMS will employ logical and technical methods to monitor and audit for violations of information security policies and internal controls. Users who violate this policy may face disciplinary action up to, and including, termination of employment. Individuals, who are not employees, found to be in violation of this policy are subject to having their access revoked and their contract terminated.



9 Implementation

Technical teams responsible for the configuration and maintenance of Open eLMS information systems and applications are responsible for implementing all controls required for the secure operation and protection of those assets. They are authorized to identify and implement all controls necessary for the security and safe operation of those systems that are not explicitly stated in policy or standards. All such controls shall be documented and raised to the Data Controller as suggested changes, and shall be reviewed and considered for documentation to be added to the next revision of the appropriate policy or standard. This policy has controls that are designed to support, ensure and evidence Open eLMS legal compliance including, but not limited to, GDPR, due diligence and duty of care to all of Open eLMS customers and stakeholders.



10 Responsibility



Open eLMS

Open eLMS will employ best practices and all other allowable means to enforce the provisions of this policy to ensure the Confidentiality, Integrity and Availability of Open eLMS company assets.



Data Controller

The Data Controller has direct responsibility for Open eLMS Security Policy compliance, for providing guidance on best business security practices, and managing the Exception Process.



Business Management

All business managers are directly responsible for implementing all Open eLMS policies and controls within their business areas, and for awareness and adherence by their staff.



Personnel

All personnel will be aware of Open eLMS policies, and act in a manner that complies with, and supports, this policy both in content and in spirit, and will report all suspected and known violations.

11 Exception Process

Any exception to the application of this policy, or individual policy statements within, or any supporting policies, requires prior written approval from the Data Controller. All exception requests must be evaluated and approved by the designated level of management of the requesting organization, with a clear statement of their acceptance of any residual risk created through the exemption.

Questions about this or any other Information Security Policy should be referred to emilrw@openelms.com



12 Document Approval and Ownership

The Data Controller is the owner of this document and is responsible for ensuring that it is reviewed annually. This policy was approved by the Open eLMS senior management, and is issued on a version-controlled basis under the authority of the Data Controller.

