



A2N Company Code of Conduct Policy

- Revision Date: November 2024
- Approved By: Frank Rondinone, President

Cyber Secured!

More than just a mantra - it is a call to action - and a promise from A2N that we will keep your data, your networks, and your business secured.

Our relationships are built on trust and strengthened through honesty, integrity and the overwhelming value delivered by our team of experts.

Do you want to experience 100% peace of mind? Allow A2N to play a key role in your company's networking and cybersecurity programs.



POLICY STATEMENT

Access 2 Networks Inc. (A2N) Company Code of Conduct

Purpose

A2N's Code of Conduct is the cornerstone of our organizational governance, promoting a high standard of ethical behaviour that fosters trust and accountability among employees, stakeholders, and clients.

- **Set Clear Expectations**
The code of conduct clearly outlines what behaviors are acceptable and unacceptable. This helps employees understand the company's values, cultural expectations, and the boundaries within which they are expected to operate.
- **Promote Ethical Behavior**
It reinforces the importance of integrity, honesty, and ethical practices. By setting a standard for ethical behavior, the company aims to prevent misconduct, fraud, and other unethical activities.
- **Protect the Company's Reputation**
A well-defined code of conduct helps safeguard the company's reputation by ensuring that employees act in a manner that reflects positively on the organization, both internally and publicly.
- **Ensure Compliance with Laws and Regulations**
It helps employees understand and follow applicable laws, regulations, and industry standards, minimizing the risk of legal issues and promoting lawful practices within the company.
- **Promote a Positive Work Environment**
By establishing expectations around respect, teamwork, and workplace safety, the code of conduct contributes to a positive, safe, and inclusive work environment, enhancing overall morale and productivity.
- **Provide a Basis for Accountability**
The code of conduct serves as a basis for holding employees accountable for their actions. If an employee violates the code, the company has clear grounds for addressing the behavior and, if necessary, taking corrective actions.
- **Encourage Reporting of Violations**
It encourages employees to report any suspected violations or unethical behavior without fear of retaliation, which helps maintain a transparent and fair workplace.
- **Strengthen Corporate Culture**
By reflecting the core values and mission of the company, the code of conduct reinforces a unified culture that aligns employees around shared principles and goals.



Scope

This policy applies to all employees, contractors, vendors, visitors, and any other individuals interacting with our company, whether on company premises or off-site at company-sponsored events.

Your Responsibilities

You are required to read and understand this Code of Business Conduct and Ethics. You must adhere to these standards in your daily activities and comply with all relevant policies and procedures outlined in the Code.

It is part of your job and ethical duty to help enforce this Code. Be vigilant for potential violations and report any violations or suspected violations of this Code promptly.

Refer to the section “Procedural Matters—Reporting Violations” for more details. You must cooperate with investigations into possible Code violations and be honest and forthcoming during these investigations.

Retaliation, threats, or retribution against anyone who has reported a violation or suspected violation in good faith, or against anyone assisting in good faith with an investigation or process related to such a violation, is strictly prohibited.

When determining if an action is appropriate, follow these steps:

- Gather all relevant facts.
- Assess the responsibilities and roles of those involved.
- Use your judgment and common sense to evaluate if the action seems unethical or improper.
- Seek guidance.

If you are uncertain about any situation or any part of the Code, discuss it with your supervisor, manager or the appropriate personnel.

General Standards of Conduct

Respect and Integrity

All employees are expected to treat one another, clients, and business partners with respect, honesty, and fairness. Discrimination, harassment, and disrespectful behavior are strictly prohibited.

Compliance with Laws and Regulations

Employees must follow all applicable laws, regulations, and company policies at all times. Violations can have legal and reputational consequences for both the employee and the company.

Confidentiality and Data Protection

Employees are required to safeguard sensitive information, including client data, intellectual property, and internal communications. Sharing confidential information without authorization is strictly prohibited.

Conflicts of Interest

Employees should avoid situations where personal interests conflict, or appear to conflict, with the company’s interests. Any potential conflicts should be disclosed to a manager.

Anti-Corruption and Bribery

Engaging in bribery, kickbacks, or any form of corruption is prohibited. Employees must not offer, give, or receive any form of improper payment to influence business decisions.



Use of Company Resources

Company resources, including equipment, funds, and information systems, are intended for business purposes. Employees are expected to use these resources responsibly and protect them from misuse.

Workplace Safety

The company is committed to providing a safe work environment. Employees are required to follow all safety protocols, report unsafe conditions, and take reasonable care to prevent harm to themselves and others.

Reporting Misconduct

Employees are encouraged to report any suspected misconduct, violations of this code, or unethical behavior. Retaliation against those who report in good faith is prohibited.

Professionalism

Employees should maintain a professional demeanor, whether in person, on the phone, or online, and contribute to a positive and productive work environment.

Responsibilities to Our Customers, Suppliers, and Competitors

Overview

You should respect the rights of A2N's customers, suppliers, business partners, and competitors and deal with them fairly and in compliance with the law. Avoid taking unfair advantage through deception, misrepresentation, manipulation, coercion, abuse of privileged information, or any other unfair business practice. It is your responsibility to read, understand, and comply with A2N's Anti-Corruption Policy.

Improper Payments

Do not authorize, offer, promise, give, solicit, or accept anything of value, such as money, gifts, entertainment, privileges, gratuities, benefits, or other items intended to improperly influence any business decision or that violate the law or create the appearance of impropriety. Contact the President if you have any questions about the propriety of a payment.

Gifts and Entertainment

You may occasionally provide or accept business amenities to build legitimate business relationships. These amenities can include gifts, meals, services, entertainment, reimbursements, loans, favors, privileges, or other items of value. Ensure that any business amenity is consistent with customary business practice, reasonable, and appropriate for the circumstance. Avoid lavish or excessive amenities and ensure they do not violate the law or create any appearance of impropriety. Do not provide or accept cash payments or other amenities that could be construed as bribes or payoffs. Accurately record all A2N funds spent on business amenities in the company's books and records. If you have any questions about the permissibility of a business amenity, contact the Legal Department.

Selecting Suppliers

A2N selects suppliers based on the merits of their products, services, and business practices, and purchases supplies based on need, quality, service, price, and other terms and conditions of sale. Do not establish a business relationship with any supplier if you know that its business practices violate applicable laws.

Handling the Non-public Information of Others

Handle the non-public information of others responsibly and in accordance with our agreements with them. This includes notes, reports, conclusions, and other materials prepared by a company employee based on the non-public information of others. Once A2N has received non-public information, use all reasonable efforts to abide by the terms of any relevant nondisclosure agreement, including obligations regarding the return or destruction of the non-public information.



Improperly Obtaining or Using Assets or Information

Do not unlawfully obtain or use the materials, products, intellectual property, proprietary or non-public information, or other assets of anyone, including suppliers, customers, business partners, and competitors. Do not coerce or improperly induce past or present employees of other companies to disclose proprietary or non-public information of their former or other employers.

Free and Fair Competition

A2N is committed to lawfully competing in the marketplace. This includes respecting the rights of competitors to compete lawfully and abiding by all applicable laws. Most countries have laws designed to encourage and protect free and fair competition, regulating relationships with distributors, resellers, suppliers, and customers. These laws address pricing practices, discounting, terms of sale, credit terms, promotional allowances, secret rebates, exclusive relationships, product bundling, restrictions on carrying competing products, termination, and other practices. Competition laws also govern relationships between companies and their competitors, prohibiting collusion on prices, discounts, terms of sale, profits, costs, allocation of products, customers, markets, territories, production or supply limitations, boycotts, or bids. Violations of these laws are severe. A2N is committed to obeying both the letter and spirit of these laws, often referred to as antitrust, consumer protection, competition, or unfair competition laws. Their application can be complex, so ensure you have a basic knowledge of them and promptly involve the Legal Department when questionable situations arise.

Investigation Process

A2N will promptly investigate any suspected violations. If it is determined that evidence of a violation exists, the individual subject to investigation will be notified. The subject of an investigation will have an opportunity to respond to any allegations made against that person. A person suspected of violating the Code may be suspended with or without pay while an investigation is conducted. A2N will follow local grievance procedures in jurisdictions where such procedures apply.

Disciplinary Action

A2N will take appropriate action against any employee, agent or contractor whose actions are found to violate the Code. Disciplinary actions may include, at A2N's sole discretion, oral or written reprimand, suspension or immediate termination of employment or business relationship, or any other disciplinary action or combination of disciplinary actions as deemed appropriate to the circumstances. A record of the disciplinary action will be retained in the employee's personnel file.

Where A2N has suffered a loss, it may pursue its remedies against the individuals or entities responsible. Certain violations of this Code may also be subject to civil or criminal prosecution by governmental authorities and others. Where laws have been violated, A2N will report violators to the appropriate authorities.

Retaliation

Retaliation against anyone who reports code of conduct violations or participates in an investigation is strictly prohibited. Any act of retaliation will be subject to disciplinary action, up to and including termination.



Training and Awareness

A2N will provide regular training and awareness programs to ensure all employees understand this policy, their rights, and their responsibilities. Training will cover recognizing, preventing, and responding to workplace violence and harassment.

Policy Review

This policy will be reviewed annually to ensure its effectiveness and compliance with applicable laws and regulations. Updates will be made as necessary.

Contact Information

For any questions or concerns regarding this policy, please contact Frank Rondinone at 416-566-4478 or frondinone@a2n.net.

Acknowledgment

I acknowledge that I have read and understood the A2N Workplace Violence and Workplace Harassment Policy. I agree to abide by this policy and understand that violations may result in disciplinary action.

Employee Name:

Signature: Date: