



Kane Computing Ltd

CODE OF ETHICS

Why do we have a Code of Ethics?

In the fast-changing world of global business, we are constantly faced with new challenges and new opportunities. This can be unsettling, and it's not always clear how we should behave in certain situations or where the boundaries lie in terms of what is acceptable to our colleagues, customers, and the communities in which we work.

The Code is designed to support Kane Computing's values and to help each of us live those values as we work. It is a practical and clear guide to the behaviour that the company expects from every one of its people. The Code deliberately sets consistent and high standards for us, no matter what our positions are within the company. It should guide and inform our everyday decisions as we work together for the continued success of Kane Computing.

Our Responsibilities

Every one of us in Kane Computing needs to carefully read and understand the Code, and we are all individually responsible for following both it and the Kane Computing policies.

We must hold ourselves—and those working alongside us—accountable for following the rules: the rules of Kane Computing, the rules of the customers we serve, and the rules of the countries in which we work and live. Being accountable means we each must take a proactive approach to ethical, legal, and compliance concerns by identifying, reporting, and addressing them as necessary.

By doing this, we can all play our part in meeting the expectations of our colleagues, customers, and shareholders, as well as many other stakeholders.

Richard White
Managing Director
Kane Computing Ltd

The Code of Ethics does not change the terms and conditions of our employment with Kane Computing. It is a guide for our day-to-day conduct as Kane Computing people.†

Contents

About the Code - Questions and Compliance.....	4
Living our Values.....	5
Our Actions	6
Our Relationships with Each Other	6
Our Relationships within the Community	7
Recognizing and Avoiding Conflicts of Interest	7
Our Commitment to Quality and to Health, Safety and Protecting the Environment	8
Our Accounting and Financial Reporting Obligations.....	9
Maintaining Confidentiality and Security of Information	9
Software Copyright and Licensing	11
Competing Fairly and Ethically.....	11
Stock Transactions	12
Improper Payments	12
Respecting Trade Controls and Immigration Laws.....	13
Maintaining Business Records.....	13
We are each Accountable.....	13

About the Code - Questions and Compliance

What is the Code of Ethics?

The Code of Ethics is a broad outline, designed to guide your decision making and help you handle business situations professionally, fairly, and legally. It is supported by a wide range of company policies, standards, and other documents that set out our obligations and responsibilities to behave ethically in every aspect of our business lives.

To whom does the Code apply?

The Code of Ethics and Kane Computing's policies apply to every employee and manager as well as to every director and officer. Ultimately, each one of us is personally responsible for making sure that we comply with the laws and regulations that apply to our business, as well as our Kane Computing requirements.

If you are in a leadership position, you must communicate and implement the Code of Ethics and the associated Kane Computing policies, making sure that your teams comply. Where appropriate, contractors and agents of the company should also follow the Code of Ethics and Kane Computing policies.

Are there waivers and exceptions to the Code?

Any waiver of or exception to the Code for executive officers or directors must be approved by the Board of Directors of Kane Computing Limited or one of its committees, and it must be promptly disclosed as required by law or stock exchange regulation. Any other waiver or exception must be approved according to company policies. If no policy applies, the waiver or exception must be approved by the Kane Computing Limited Director of Compliance.

What if you are unsure about how to interpret the Code?

The Code and the Kane Computing policies should help you work through most business issues and dilemmas. However, in some situations the answers may not be obvious. If this happens, take time to think through these questions:

- Do you know all the necessary facts?
- Have you reviewed the facts carefully?
- Have you thought about all your options?
- Have you used all the resources available to you (management)?
- Have you discussed the issues and potential options with your Managing Director (or are you reluctant to do so)?
- What are the consequences of your decision?
- Will your decision stand the test of time?

If you are still not sure what to do, then speak up and get the advice and guidance you need. All employees are encouraged to speak openly and ask questions about the Code, Kane Computing policies, or any other subject without fear of retaliation. No Kane Computing employee, director, or manager is allowed to retaliate or take any hostile action against anyone who raises an issue of concern in good faith.

Retaliation is forbidden

Kane Computing does not tolerate retaliation against any employee who reports a potential or actual violation of company policy or provides further information during a review of a violation. However, any employee who fails to report or provide further information about a violation or who intentionally reports false information will be subject to disciplinary action.

Who can you talk to about concerns or to report a violation?

As Kane Computing employees, we are each accountable for upholding the Kane Computing Values. If you know or have reason to believe there has been a violation of the Code, associated policies, or applicable law, you must report the incident.

To report a violation or to ask questions or express concerns about the Code of Ethics, associated policies, or business practices, you should contact your manager. If this is not practical, contact the Kane Computing Limited Director of Compliance.

What happens if you do not follow the Code?

Whether knowingly or not, if you violate the Code of Ethics, associated policies, or applicable laws, you could be subject to personal legal liability or company disciplinary action, so it is essential that you understand what is expected of you.

Living our Values

Making the most of our unique assets

Kane Computing is committed to providing services that enhance and optimize our customers' performance. To deliver value to our customers, we capitalize on our global culture and extensive experience in developing and deploying innovative technology solutions.

The Kane Computing Values

Supporting our work are three well-established company Values that focus on people, technology, and profit:

- Our **people** thrive on the challenge to excel in any environment and their dedication to **safety** and **customer service** is our greatest strength.
- Our commitment to **technology** and **quality** is the basis for our competitive advantage.
- Our determination to produce superior **profits** is the cornerstone for our future **independence** of action and **growth**.

Commitment to Customers

Kane Computing is committed to excellence in everything we do. Our customers place a great deal of trust in us, particularly when it comes to handling sensitive and confidential information. Our reputation for integrity and fair dealing is vitally important in winning and retaining this trust. We do business with all our customers in a consistent and transparent way and do not hold equity stakes in our customers' assets.

Our Actions

Demonstrating integrity

Acting ethically is not just about complying with the formal laws and regulations that govern our business. It is about understanding that our decisions may affect those who do not have the opportunity to participate in making these decisions. With this understanding, we are able to make informed business choices that avoid violating laws and company policies. We reduce the risk of incurring expensive fines and liabilities, and, most importantly, we protect our earnings and shareholder value by providing a strong foundation for expanding our services and customer base.

It is well understood that everyone in Kane Computing must respect and follow the laws of the countries in which we operate. In addition to this, we must all dedicate ourselves to earning the respect and maintaining the trust and confidence of our colleagues, customers, and shareholders, as well as all others affected by our operations.

If we are clearly seen to behave ethically, we enhance our reputation for integrity, which in turn helps us attract and retain both customers and employees.

Dealing with international differences

As we work around the world, we will come across customs and laws that may vary widely and may conflict with one another. Even if you are operating in a country where local laws or common practices do not require the same level of conduct that is set out in the Code and our policies, you are expected to always maintain the high standards of ethical behaviour to which Kane Computing is committed.

The people of Kane Computing deliver high-quality technology and services worldwide. This means that we are subject to the laws of the different countries where we operate. Each of us is accountable for knowing and following the laws and regulations that apply where we work.

Our Relationships with Each Other

Celebrating diversity and equality

One of the strengths of Kane Computing is the diversity of our workforce. Men and women of many backgrounds are working together to achieve common objectives. As a company, we encourage fair employment practices worldwide and offer equal opportunities to all our employees. To foster such an environment and opportunities, we strive to take family considerations into account in any decision about personnel matters or assignments.

Working together with mutual respect

All our employees are expected to treat each other professionally, based on mutual respect, trust, and individual dignity. Kane Computing does not tolerate any form of harassment. We expect Kane Computing employees to use these same standards when interacting with customers, contractors, as well as others affected by our operations.

Conduct to avoid

Actions or words that could be taken as hostile, improper, or offensive must be avoided. Behaviour that is offensive or unwelcome or that unreasonably disrupts another person in his or her work amounts to harassment. This is inappropriate and unacceptable. As with unsafe situations, if you see this conduct, it is your duty to report it in order to protect your co-workers and make Kane Computing a better place to work.

Our Relationships within the Community

Contributing to development worldwide

Kane Computing expects its contractors and suppliers to act consistently with the Code. The use or contracting, directly or indirectly, of slave labour, child labour, or any form of forced labour is strictly prohibited.

Individually contributing to local communities

Wherever you come from and wherever you go, you will be seen as a representative of Kane Computing, so you are responsible for behaving in a way that earns the respect and maintains the trust and confidence of the people around you. We actively encourage you to contribute to the social development of your community by sharing your talents and skills, particularly by supporting initiatives that improve young people's education or living conditions.

Recognizing and Avoiding Conflicts of Interest

What is a conflict of interest?

A conflict between your personal interests and the interests of Kane Computing or a customer is a conflict of interest. All of us must avoid such conflicts. In addition, we must avoid situations that may be perceived as creating a conflict of interest.

A conflict situation can arise if you have personal, social, financial, political, or other interests that could potentially interfere with your responsibilities at work. You are expected to put Kane Computing business interests ahead of your own. You must ensure that neither you nor any member of your family receives any improper personal benefits as a result of your position with Kane Computing.

Although there are many examples of such conflicts, some of the most important areas for potential conflict are set out in the following paragraphs.

Using Kane Computing assets

You must use Kane Computing assets—such as equipment, financial assets, or confidential information—for proper Kane Computing purposes only.

Loans to Kane Computing employees, directors, and officers

Any personal loan from the company to a Kane Computing employee, Directors or Officers is prohibited unless it is approved by the Managing Director.

Business gifts

Accepting a gift from a business associate could create a sense that you owe that person a favour. Gifts can be any items or benefits for which the recipient does not pay fair market value. You must not accept any gift of more than nominal value (defined as GBP 20 or any lower limit specified by your location) from any individual or organization that does business with Kane Computing or wants to establish a business relationship with us. We must also avoid giving gifts beyond nominal value to companies or individuals with whom we may do business. Unacceptable gifts include cash, loans, excessive entertainment or travel, or substantial favours. Gifts are also subject to the requirements in the "Improper payments" section of the Code and the Kane Computing guideline on business gifts and courtesies.

Giving Gifts

Token or goodwill gifts such as pens and baseball caps are examples of common nominal gift giving. Use your good judgment to thoughtfully select and present gifts in a way that is consistent with the Code and our policies.

Doing business with Kane Computing

If you (and your immediate family—spouse, parent, or dependent child) need to conduct a personal business transaction directly with Kane Computing you can do so only by obtaining written approval of the Managing Director.

Personal interests in other companies

You must make sure that you (and your immediate family—spouse, parent, or dependent child) do not have an active interest in any organization that does business with or competes against Kane Computing, including vendors or supplier companies. This means you must not serve as a director, officer, employee, agent, or consultant of any such company unless you receive prior approval as provided in the Code or policies.

Disclosing Conflicts

Selecting contractors and suppliers and approving their quotations or invoices are activities in which you must exercise special care. You should follow all internal procedures, and always avoid any situation that could appear to be a conflict of interest. If you have an active personal interest with a supplier or contractor, you must not deal with them. Instead, tell your direct or functional supervisor, who can assign someone without a conflict of interest to the transaction. Conflicts can also arise from a spouse or parent working in an organization that does business with or competes against Kane Computing. In these cases, the relationships should be disclosed as provided in the Conflict of Interest Policy.

Our Commitment to Quality and to Health, Safety and Protecting the Environment

A practical commitment to Quality

The long-term business success of Kane Computing depends on our ability to continually improve the quality of our products and our service delivery for both external and internal customers. By meeting or exceeding customer expectations every time and all the time, we demonstrate our commitment to Quality. Our proactive Quality culture must be understood, shared, and practiced by all employees as an integral part of everyday business. Managers are responsible for maintaining a culture of Quality awareness so that prevention of all non-conformances is a recognised and integral part of our daily activities. Each employee is individually responsible and accountable for Quality within his or her area of activity. Each of us is also responsible for adhering to company policies, standards, procedures, and work instructions. Together, we are committed to continual Quality improvements with systematic audits and periodic assessments within the Kane Computing organisations and addressing customer feedback in a timely and appropriate manner.

An unwavering commitment to HSE

At the heart of the Kane Computing culture is a strong and visible commitment to Health, Safety, and Environment (HSE). In practical terms, this means focusing on safeguarding people's health, operating the business safely, protecting the environment, and fostering good relationships with the communities in which we operate.

Working safely

Kane Computing is responsible for maintaining a safe and productive work environment, free from the harmful effects of alcohol, controlled substances, or legal or illegal drugs. You are prohibited from entering Kane Computing facilities, conducting company business, or operating equipment if you are impaired by alcohol, drugs, or controlled substances or if you have illegal or unauthorised possession of any of these substances.

Driving is the activity that presents the greatest potential risk for accidents in Kane Computing. We are committed to making sure that people who drive as part of their job meet specific safe-driving standards.

Our responsibilities

Each one of us is responsible for Quality and HSE. We believe that the full integration of Quality and HSE objectives into all levels of management is essential.

Stop the Job

Where an unsafe condition exists, whether in travel, operations, manufacturing, or any other activity, all Kane Computing people can and must stop the job to prevent injury or harm.

Our Accounting and Financial Reporting Obligations

Complying with accounting and financial reporting standards

All transactions must be described accurately in the books of account or supporting documents to enable preparing financial statements. All company assets and liabilities must form part of the books of account included in the company's uniform financial statements.

We ensure that all books of account and supporting documents are fully available for audit by internal auditors and independent external auditors.

Any reporting or disclosure of financial information—whether it is inside the company or to the public—must be full, fair, accurate, timely, understandable, and approved by the appropriate level of financial personnel. In addition, reporting or disclosure must comply with applicable laws and regulations and with Kane Computing financial procedures.

Making financial transactions on behalf of the company

You must have the appropriate management authorisation for any transaction that you conduct on behalf of Kane Computing.

Maintaining Confidentiality and Security of Information

Information: The foundation of our business

It is essential to our reputation and our survival as a business that we protect important information, whether it belongs to Kane Computing or to others who have entrusted it to us. For example, many of our customers entrust us with their confidential information. In other situations, we may become aware of other companies' confidential information as a part of doing our job at Kane Computing. We are all responsible for protecting this information, ensuring that it is used properly and not sharing it with others. Confidential or commercially sensitive information can come to you in many forms—in conversation, paper copy, or electronically—and can relate to any part of our business or our customers' activities. Examples include marketing plans, customers' reservoir data, information stored in the Corporate Directory, and financial operating results. Disclosure of this type of confidential information is often regulated by law, and inappropriate disclosure may lead to both individual civil and criminal liability.

Protecting restricted information

You must follow the Kane Computing corporate standard for classifying information, as well as the IT security procedures that relate to this standard. If you have access to information that is designated as commercially sensitive or confidential, you are responsible for making sure that you do not disclose that information to any unauthorised person, inside or outside Kane Computing, without necessary prior approvals. The accidental disclosure of confidential information can be just as harmful as intentional disclosure, so you need to be particularly careful of what you say or do in your day-to-day interactions with customers and other business associates or in social settings. You also need to be careful when you are handling computers, software, data, and e-mail messages to ensure that you do not inadvertently allow access to sensitive information. This includes protecting against theft of or damage to company computing assets and other data devices provided to you for your work.

Data privacy and protection

Kane Computing is committed to protecting and respecting the privacy of any employee or third-party personal information that it processes. The Data Protection Act guides our conduct in the collection, use, release, disclosure, and security of such data and describe our expectations of third parties who process such data on our behalf. Personal information shall be collected for lawful purposes and used for the purposes described, with everyone who has access to the collected data accountable for its use. In addition, any transfers of such personal information across international boundaries must comply with applicable company rules and law.

Access to company property

To prevent inappropriate disclosure of our business information, you and the people you sponsor must get the appropriate management authorisation for access to company property, including buildings, equipment, and data.

Personal use of social networking and third-party Web sites

The company generally views personal and social forum Web sites and Web logs ("blogs") positively, and it respects the right of employees to use them as a medium of self-expression. However, employees are not authorised to represent the company on such Web platforms. If you choose to identify yourself as a Kane Computing employee or to discuss matters related to the company in a social Web space, some readers may view you as an actual spokesperson for the company, even though your Web activity is a personal project and personal expression.

If you identify yourself as a Kane Computing employee, following the Code, applicable policies, and IT guidelines will help you avoid miscommunication. You should ensure that your profile and related content are consistent with how you want to present yourself to colleagues and customers. The Kane Computing brand is represented best by its people, and what you publish may reflect on all of us.

Information technology

Kane Computing provides a range of IT tools, such as computers, software, and networks, to employees for business purposes. Limited personal use of these tools is allowed. All electronic records, such as e-mail messages and computer files, that are produced using Kane Computing IT tools are Kane Computing property and may have the same legal and operational effects as traditional paper documents. In the ordinary course of our business, Kane Computing has the right to review the information stored or transmitted using these tools.

This means you cannot expect any information that you transmit, receive, or store using Kane Computing systems or tools to be private. If you wish to keep any information private, you should not create or store it on company systems.

At times the company may be required, in response to legal obligations or internal company reviews, to acquire individual computer information. Each employee is held accountable for all information they create or store on company computers or servers. Employees are also required to cooperate with company investigations, which include making your computer available for examination or providing any information needed during a review. Employees may be subject to disciplinary action if they fail to cooperate with a company review.

Software Copyright and Licensing

Respecting the rules

As a company, Kane Computing respects copyright laws and observes the terms and conditions of software license agreements. You must never make unauthorised copies of software.

All the software we use must be properly licensed. You or your local IT team must keep a record of the license agreements and documentation. Everyone who uses computers in Kane Computing must comply with company restrictions on the installation and use of third-party software.

Competing Fairly and Ethically

An honest and open approach

Kane Computing competes aggressively but fairly in the marketplace. We do not win business or seek to maintain customer relationships by acting illegally or unethically or competing unfairly. That means each of us should deal fairly and openly with customers, suppliers, and competitors and respect their rights.

Promoting full and fair competition

As a Kane Computing employee, you must not take unfair advantage of a business situation by abusing privileged information, misrepresenting material facts, or deliberately doing anything that could be seen as unfair dealing. Whenever we are involved in trade association activities or in other situations where there is communication among competitors, customers, or suppliers, we must be especially alert to ethical and legal requirements. Whenever we have contact with our competitors, we must be aware of the possible appearance of our actions. Working in collaboration with our competitors to "fix" the market is illegal and strictly prohibited. No one in Kane Computing is permitted to make any kind of agreement or understanding with our competitors that restricts full and fair competition in any way. This prohibition includes fixing or controlling prices; allocating products, markets, or territories; and limiting the manufacture, sale, or production of any product or the provision of any service.

Working within the law

Many countries have antitrust and other laws and regulations that promote free and fair competition. We are all responsible for obeying these laws and for making sure that we do not deliberately or accidentally expose Kane Computing and ourselves to financial penalties, lawsuits, or other legal actions.

Proprietary Information

Of particular concern is customer or competitor proprietary information received from third parties with access to pricing or bidding information. This information may have been obtained corruptly or otherwise improperly, and employees who receive or are offered such information should immediately report it to their direct or functional managers or to the Legal Department.

Stock Transactions

Dealing in the stock of our customers and other companies

If you have access in your course of work to material, non public information about any company, you must not share that information with others nor buy or sell any of that company's securities or options. You should also be careful to avoid creating even the appearance of improperly using inside information.

Because of the close relationship between our service businesses and our customers, as a Kane Computing employee you may not purchase stock in companies that are customers of Kane Computing other than as part of a mutual fund.

Improper Payments

Never offer or accept a bribe or inducement

We compete solely on the quality of our employees and our products and services. Although nominal gifts may at times be permitted, you must never give or receive any kind of bribe or hidden payment—or anything else of value—for any reason, in order to

- Influence someone's judgment about Kane Computing products and services or those of another company
- Gain improper advantage when selling our goods and services, conducting business transactions, or representing Kane Computing interests
- Influence the use of discretionary authority by any government official.

This includes payments to any government official in any branch of government (or anyone exercising governmental powers), political candidates or parties, officers or employees of any corporation owned or controlled by the government, any customer, or anyone else.

This applies not only to direct payments but also to payments through agents, consultants, suppliers, customers, or other third parties or reimbursing a payment that you or someone else may have made personally.

Beware of Facilitation Payments

The company generally prohibits the payment of facilitation or expediting payments made to speed up routine government action (for example, customs inspections, visa processing, and the like). Only where any payment would strictly comply with our internal financial procedure for approving, identifying, and recording the nature of such payments may a facilitation payment be considered by the appropriate level of management. These facilitation payments cannot be used as a substitute for proper licenses or other required documentation. It is mandatory that local management implement processes to comply with these requirements.

Contributions to political parties and candidates for public office

Kane Computing is politically neutral, so you must not make any contributions of the company's funds or assets to political parties or organizations, their leaders, or candidates for or in public office.

Respecting Trade Control

Complying with laws and regulations

As a global company, we provide our products and services to companies in many countries throughout the world. Most of these countries have specific trade and customs laws and regulations governing the import or export of the products or services Kane Computing offers.

We must strictly comply with all import and export control laws and trade regulations that apply to us, wherever we do business. Each of us is responsible for taking appropriate actions to ensure that every import, temporary import, export, or re-export of products, services, technology, software, or waste complies with all relevant local and international trade laws and rules, including customs regulations.

Maintaining Business Records

Full and accurate accounting of our activities

Making responsible business decisions; meeting legal, financial, regulatory, and management obligations; and maximizing the benefits of our knowledge and previous experience depend on every employee of Kane Computing keeping honest and accurate business records.

You must never hide, alter, falsify, or disguise the true nature of any transaction. Business records and communications often become public, so you must avoid exaggeration, derogatory remarks, speculation, or inappropriate characterization of people and companies. This applies equally to e-mail messages, internal memos, and formal reports.

Archiving and destroying business records

Every business unit is responsible for making sure that its records are retained or destroyed according to local laws as well as the Kane Computing standards that govern document retention and destruction.

At times, you may be directed by the company to retain documents, in electronic or other formats, in connection with certain specific subjects. Documents identified for retention must be retained because failure to do so could result in criminal, civil, or administrative penalties or disciplinary action.

We are each Accountable

Managers are accountable for providing the resources necessary to maintain defined and expected performance levels throughout the organization. All employees are individually responsible and accountable for adhering to company policies, standards, procedures, and work instructions within their area of activity.