

CODE OF BUSINESS ETHICS



CONCEPT.COM TECHNOLOGIES LTD

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United Kingdom

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“SAY WHAT WE DO AND DO WHAT WE SAY”

1 Honesty & Integrity in Business

Concept.Com Technologies Ltd (Concept.Com) is committed to the highest standards of ethical conduct in all that it does. The Company complies with all applicable legal and regulatory requirements governing business relationships and international trade, including relevant export and import control regulations. Concept.Com believes that honesty and integrity engender trust. Concept.Com conducts its business in accordance with all the applicable laws and regulations of the countries in which it does business. The Company requires that its employees, representatives and all persons associated with its business comply with this Code and the applicable laws.

2 Prohibition of Bribery Corruption and Extortion

The Board of Concept.Com has a zero tolerance towards bribery and corruption. The Company’s employees will not offer, promise, give, solicit or accept bribes or other unethical inducements, including facilitation payments, in order to obtain, retain or give business or gain any other advantage. Concept.Com takes all reasonable measures within its power to ensure that its employees, representatives and persons associated with its business follow the same practice.

3 Competition

Concept.Com competes fairly and vigorously in its market sector and it does not engage in, nor is it a party to, any agreements, business practices or conduct that as a matter of law, are anti-competitive or may be construed as participation in trade or associated cartels.

4 Integrity in Business Behaviour

Concept.Com expects its employees to act with professionalism and integrity at all times. Those employees who have access to privileged information must not use it to achieve personal gain for themselves or others. No employee shall engage in personal activities or pursue financial or business interests which might give rise to, or give the appearance of, conflicts of interest with Concept.Com; or might compromise their personal ability to meet the responsibilities of their job.

5 Conflicts of Interest

Concept.Com expects its directors and employees to report any potential conflict of interests whether personally or through a family relationship, which may not be in the interests of the Company and its shareholders. A conflict of interest may also occur where there is an inappropriate relationship with a customer, supplier, business partner, either directly or, indirectly through a third party including a financial interest.



In all cases where a conflict of interest might arise, these should be reported to the Managing Director.

6 Customer, Supplier and Sub Contractor Relationships

Concept.Com seeks to listen to the needs and concerns of its customers and treat them with respect; to provide its customers with products and services which meet or exceed their requirements; to respond quickly to changing customer demand and to seek to continuously improve product quality, value and delivery times.

Concept.Com believes in working in equal partnership with suppliers and subcontractors, to meet customers' expectations and ensure quality, value and timely delivery. Payment to suppliers and subcontractors will be made promptly within the agreed terms of business.

7 Employees

Concept.Com is an equal opportunities employer. The Company recruits, selects and promotes its employees on the basis of their qualifications, skills, suitability aptitude and work ethic, regardless of their ethnicity. The Company treats all its employees with respect and dignity. Harassment or bullying of any kind is unacceptable behaviour and will not be sanctioned.

Concept.Com complies with all relevant anti-discrimination legislation and regulations in the countries in which it does business, in respect of its employment related decisions.

8 Health and Safety

Concept.Com is committed to conducting all its activities in a manner which achieves the highest practicable standards of health and safety for the welfare of its employees.

9 Environment

Concept.Com is committed to a proactive policy on environmental issues and compliance with the appropriate legislation is a primary goal. An objective is the reduction and management of waste through good utilisation of raw materials, energy resources and water supplies, as well as minimising waste at source. It will encourage its suppliers in re-use or recycling techniques and consideration for the environment.

10 Human Rights

Concept.Com adheres to all relevant government guidelines designed to ensure that the products it manufactures and/or sells are not incorporated into weapons or other equipment used for the purposes of crime, terrorism, internal repression or the abuse of human rights.



Concept.Com seeks to uphold all internationally recognised human rights legislation, wherever its operations are based, including but not limited to the abolition of the use of child labour and ensuring its business partners and suppliers do not pay below the recognised minimum wage in their countries of operation.

11 **Reporting and Internal Controls**

Concept.Com records all business transactions accurately, prudently and transparently in compliance with its accounting standards and has appropriate internal controls to ensure that it is managed effectively and that the reported results are accurate.

Concept.Com will retain and review all records of instances of initial and continuance training, annual employee records of compliance and records of gifts, hospitality and any other benefits, whether accepted or not.

12 **Application and Sanctions**

This Code of Ethics applies throughout the Company and to all its employees, temporary contractors, representatives [advisors, agents, consultants and distributors] worldwide. Blatant disregard of, or a material breach of this Code, will result in disciplinary action against an employee and sanctions/and or immediate dismissal of third parties representing the Company.

Concept.Com seeks, wherever possible, to ensure that its key suppliers, business partners and any joint venture or offset project in which it participates, complies with this Business Code of Ethics or has in place a similar code and business process of its own.

13 **Disclosure**

In the event of any breach of this Code, the incident should in the first instance be reported to the Managing Director of Concept.Com.

14 **Compliance**

Concept.Com expects employees and any others acting on its behalf or in any business relationship with the Company to bring any suspected or actual breach of this Code promptly to management attention.

Any employee making such information known to management through the appropriate procedures will not face any adverse or unfavourable treatment for such disclosure.