



OUR CODE OF CONDUCT

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OCTOBER 2023

Welcome to our Code of Conduct



Pure DC's purpose is to be a leading digital infrastructure developer that meets today's demands and safeguards all of our tomorrows.

To achieve our purpose, we must conduct business with integrity and honesty and in a socially responsible, safe, and sustainable way.

This means that we will not only act in accordance with all applicable laws, but we will also aim to create long-term social, environmental, and economic benefits by adhering to ethical business practices and maintaining high standards in relation to health and safety, human rights, and environmental matters.

We expect our employees and those with whom we do business to share our commitments and to work in partnership with us to achieve these goals. This Code of Conduct therefore establishes a set of common standards and business behaviours that everyone across the global family at Pure DC should follow.

Our employees, suppliers, contractors, agents, and other business partners are expected to read, understand, and follow this Code of Conduct when working for, and with, Pure DC; it forms an integral part of our relationship and is the minimum set of standards and behaviours we expect.



Dame Dawn Childs
Chief Executive Officer

Dawn Childs

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Chief Executive Officer

Code Adherence: All aspects of the Pure DC Code of Conduct must be adhered to. Pure DC reserves the right to audit against compliance with this Code of Conduct and may request access to documentation demonstrating compliance at any time. Pure DC reserves the right to terminate contracts in the event of material breach of the principles set out in this Code of Conduct.

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01. Our Values



Values are the DNA of an organisation – they run through everything we do and define what it means to work at Pure DC. They lay the foundation for what we care about most and capture the essence of what binds us together as Team Pure.

Every day we have conversations and interactions that provide us with opportunities to live and demonstrate our values. The way we do this is what sets us apart. That ‘way’ is rooted in our values. We all have a part to play in demonstrating and upholding our values.

OUR VALUES



WE ADAPT

BY:

- Embracing innovative ideas, technologies and ways of working
- Executing with agility, flexibility and speed
- Seeking simple and effective solutions
- Trying, learning, adapting and improving
- Striving for professional and personal growth



WE CARE

BY:

- Considering our colleagues, our stakeholders our communities and our planet
- Being mindful of the impact of our actions on others
- Prioritising safety
- Celebrating our successes and having a positive mindset
- Doing the right thing and making a difference



WE EMPOWER

BY:

- Allocating & accepting responsibilities
- Speaking up and ensuring everyone feels heard
- Trusting each other’s motivations and actions
- Respecting our team’s capabilities and challenges
- Being passionate and proud



WE DELIVER

BY:

- Working together to achieve better outcomes
- Keeping our promises and commitments
- Championing inclusion and valuing diversity
- Communicating with and listening to one another
- Partnering in positive, long-term relationships



02. What is this Code of Conduct and who is it for?

This Code of Conduct aims to:

Explain our values and the behaviours we expect from our people and our suppliers with whom we work across the globe.

Provide easy to understand and practical help and guidance on how to apply Pure DC's values and behaviours day to day.

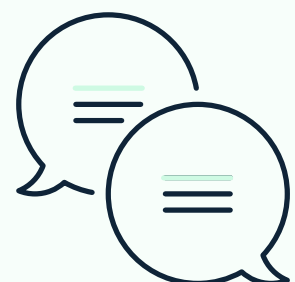
Explain how our people and supply chain can raise concerns or ask questions if unsure about any activities or behaviours that do not align with Pure DC's values.



03. Speaking up – How to raise a concern

We are committed to providing an open, honest, transparent, and safe working environment where our employees, contractors, consultants, suppliers, and other business partners can report any concerns or malpractice.

If you believe that a wrongdoing is, has, or could have taken place (for example, a breach of law or regulation, a danger to the health and safety of any individual, or damage to the environment) then this should be reported to your immediate manager or appropriate Pure DC contact. If that's not appropriate, you should follow the approach set out in our Whistleblowing Policy, which includes details of our independent and confidential reporting hotline.



04.

Health, Safety and Environment



We believe that exemplary HSE performance is essential to upholding our values and forms an integral part of an efficient and successful business.

Almost all injuries are preventable. We strive to create a safe working environment where we have taken all reasonable steps to assess working environments, hazards, and risks, with the aim of reducing risks as much as possible to prevent accidents from occurring. We promote an environment where employees, contractors, and the public are not exposed to anything detrimental to their physical or mental health.

HSE is everyone's responsibility and we each have a duty to intervene to prevent unsafe conditions and actions and to reinforce good behaviours.

WE DO:

- Plan and assess our activities so that we can find the most safe, effective, and environmentally considerate way to carry out our tasks.
- Report unsafe conditions, practices and acts immediately, taking reasonable action to make them safe as soon as possible.
- Reward and encourage safe behaviour and attitude.
- Expect the highest of standards and employ the most capable candidates to proactively monitor these.
- Positively support the 'Stop Work' culture at all levels if something is observed to be unsafe.

WE DO NOT:

- Take short cuts or bypass the approved processes, procedures, and safe systems of work.
- Carry out a task that we are not trained to do.
- Put ourselves or others in danger.
- Ignore unsafe practices, conduct or conditions.
- Enter work areas that we are not authorised to enter.
- Worry about speaking up and intervening where we identify unsafe working conditions.
- Work under the influence of alcohol or drugs.

Refer to the Pure DC Health, Safety and Environment Policy for further information.

05. Our People and Assets



The following policies and principles apply equally to everyone working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives, and business partners.

RESPECT

Pure DC aims to ensure that everyone is treated with dignity and respect and that everyone feels able to be themselves at work and does not feel left out, bullied, or harassed based on any protected characteristic or any other factor.

In the unlikely event that any form of bullying, harassment, or victimisation at work (which includes threatening behaviour), is experienced, we encourage everyone to speak up and address this.

For further information please refer to Pure DC's Anti-Harassment, Bullying and Victimisation Policy.

WE DO:

- Speak up if we see bullying, harassment, or discrimination.
- Encourage and support people who challenge or report any inappropriate behaviour.
- Treat everyone equally and promote fair opportunities and respect without the fear of discrimination.
- Take accountability for our actions.
- Act promptly and challenge inappropriate behaviour when encountered or witnessed.

WE DO NOT:

- Tolerate any behaviour or conduct that constitutes bullying or harassment.
- Make inappropriate jokes, humiliate those we work with or engage and spread gossip and rumours that might be, or could be perceived as, hurtful and disruptive.
- Ignore the problem.

HUMAN RIGHTS

Our Anti-Slavery and Human Trafficking Policy sets out our a zero-tolerance approach to modern slavery and commitment to implement effective systems and controls to ensure modern slavery is not taking place within our business or in any of our supply chains.

We expect the same high standards from all our contractors, suppliers, and other business partners. When contracting with us, we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and require compliance with all applicable national and international anti-slavery and human trafficking laws.

05.

Our people and assets



WE DO:

- Support all the principles set out in the United Nations Universal Declaration of Human Rights.
- Support international standards regarding child labour and minimum age of working.
- Oppose modern slavery and human trafficking and take steps to ensure our supply chain does not use or encourage these practices.
- Comply with national legal requirements regarding wages and working hours in the regions where we operate.
- Observe, protect, and promote these rights wherever we operate.

WE DO NOT:

- Work with suppliers whose practices do not align with our Anti-Slavery and Human Trafficking Policy, or do not take reasonable steps to ensure their suppliers are aligned with the same principles.
- Ignore human rights abuses by our employees, suppliers, customers, or business partners.

EQUITY, DIVERSITY, AND INCLUSION

We value difference, and believe that the diversity of people, opinions, skills, beliefs, and abilities is a strength that helps us to be at our best both individually, and as a business. We also believe that everyone should be recruited and promoted on the basis of their ability, contribution and potential. Everyone across Pure DC is responsible for promoting and supporting a culture of fairness, respect, and equality. We pride ourselves on ensuring that every new team member feels welcome and has a sense of belonging and connection to our company.

WE DO:

- Provide equal opportunities for all.
- Maintain an inclusive work environment free from discrimination.
- Comply with all employment laws in the region of operation.
- Ensure that we have diversity of thought at all levels in our organisation.
- Hire the best people.
- Promote talent on the basis of merit.

WE DO NOT:

- Neglect any employee group.
- Allow unconscious bias.
- Discriminate on the basis of age, ethnicity, mental or physical disability, HIV and AIDS, gender, race, religion and beliefs, sexual orientation and socio-economic background.

05.

Our people and assets



SECURITY - PROTECTING PURE DC'S PEOPLE, SERVICES, AND ASSETS

The safety and security of our people, our services, properties, and assets shall always be paramount.

We will regularly assess the risks of our activities, set priorities, and develop plans to reduce risks and minimise consequences, ensuring these are adequately resourced. The safe delivery and management of projects and operation of facilities is a critical success factor – at Pure DC we are determined that it is not just the end result that matters, we care about how we get there.

WE DO:

- Understand and support the principle that security is everyone's responsibility and report promptly any related issues or concerns.
- Comply with all security policies, standards, processes, procedures, and other arrangements.
- Always consider whether our activities could expose our team, the communities in which we operate, our live services, or our assets to unreasonable levels of unmitigated security risk.
- Take reasonable care with our own security, and that of our colleagues and business assets.
- Report promptly to the security team all security related incidents.
- Investigate all security related incidents and address any issues identified.

WE DO NOT:

- Remain silent with regards to any activity, conduct or condition which adversely impacts on the safety and security of others, the protection of assets or the business services.
- Attempt to circumvent security arrangements or encourage others to do so.
- Ignore security concerns, no matter how small it may seem.
- Ask our team to undertake activities which may expose themselves or our assets and live services to adverse security risk.

APPROPRIATE USE OF IT SYSTEMS

Pure DC's computer systems and the information they contain are valuable assets which must not be used for any improper purpose, or in any way that might affect their operation or integrity.

Any information stored or communicated on company computer systems is presumed to be company property.

Our information security and acceptable use policies must be followed when using company computer systems for work-related or personal use (including on all social media sites).

05.

Our people and assets



WE DO:

- Lock our devices if we leave them unattended, ensuring screens are kept clear of information when not in use.
- Notify the Pure DC IT team/your manager/your Pure DC contact of any potential data breaches, loss or compromise of IT assets or systems or cyber security incidents – no matter how small.
- Take reasonable care to keep all equipment protected in a case/protective bag.
- Take care when connecting to public WiFi networks and ensure approved VPNs are always used.
- Report any observed bad practice, vulnerabilities, or conditions which could compromise our IT assets or networks.

WE DO NOT:

- Share passwords, access codes, user details with anyone unless authorised to do so by a member of the IT Management Team.
- Leave IT equipment unattended without locking your screen as a minimum – you should keep devices with you or locked away if possible.
- Use software or systems (including SAAS, online applications or data storage systems) that have not been authorised by the IT team.
- Attempt to circumvent any IT security measures put in place.
- Change or remove any IT equipment in our offices, data centres or other premises without permission from the IT team.
- Click on or respond to any unknown/unidentified emails text messages, social media requests/phone calls.
- Use unauthorised or unregistered devices.

DATA PRIVACY

We recognise that the correct and lawful treatment of Personal Data will maintain confidence in the organisation and will provide for successful business operations. Protecting the confidentiality and integrity of Personal Data is a critical responsibility that we take seriously. We adhere to the following principles when processing personal data:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality (security)
7. Accountability
8. Data Subject Rights and Requests

WE DO:

- Comply at all times with the Pure DC Data Protection Policy and refer to the accompanying Privacy Guidelines for further information.
- Process only personal data that is adequate, relevant, and limited to what is necessary.
- Ensure personal data is accurate and kept up to date.
- Report personal data breaches as soon as they occur to the Data Protection Officer at dpo@puredc.global.

WE DO NOT:

- Share Personal Data with third parties unless the required safeguards and contractual arrangements have been put in place.
- Transfer personal data outside of the UK without checking the country to which the Personal Data is being transferred to has an adequate level of protection.
- Keep personal data for longer than is necessary.

05. Our people and assets



CONFIDENTIAL INFORMATION

The preservation of confidential information and the correct and lawful treatment of all business information is essential. We protect our confidential and proprietary information by putting in place appropriate security measures including the use of Non-Disclosure Agreement's (NDAs).

WE DO:

- Consider whether information is confidential before sharing it with a third party. **If you are unsure, contact the Pure DC legal team before sharing any information.**
- Ensure an NDA is in place with every third party that you wish to share confidential and/or proprietary information related to the activities of Pure DC.
- Comply with all Pure DC policies, process, procedures, and direction with regards to information management and security, including Pure DC's Information Classification and Handling Policy.
- Regularly assess the Confidentiality, Integrity, and Availability of the information we process and store, seeking advice and taking appropriate measures to safeguard and limit access on a need-to-have basis.

WE DO NOT:

- Share any confidential or proprietary information without ensuring an NDA or other obligation of confidentiality approved by the legal department is in place.
- Circumvent the security measures that are in place to safeguard confidential or proprietary information from unauthorised access or use.

06.

The Environment and Our Communities



THE ENVIRONMENT

Pure DC is implementing a pathway to net-zero in operations by 2030 for our data centre portfolio. Our ambition is to achieve this with a positive impact on the communities and the environment in which we operate. We expect those we work with to support us in this ambition.

To achieve our ambition, we are committed to the intelligent design of digital infrastructure. Our sustainability commitments outlined herein, are aligned with the United Nation's Sustainable Development Goals, and are based on the following key pillars:

- Net Zero Carbon: upfront and operational
- Zero waste to landfill
- Net Zero water use in operation
- Nature Positive
- Positive societal impact
- Improve skills growth

WE DO:

- Adhere at all times to Pure DC's Sustainability Policy and understand its requirements.
- Continually seek opportunities to conserve energy, water, and materials in line with sustainability policies.
- Report any potential environmental risks or incidents and non-compliance with sustainability policies and guidelines.
- Ensure Environmental Management Plans are in place during construction activities and for all our operational sites.
- Comply with the environmental standards and procedures and any relevant laws and regulations on our sites.
- Consider entire lifecycle carbon footprint and recycling of materials when purchasing assets or planning activities, considering any legacy issues these may leave.

WE DO NOT:

- Make decisions without considering our environmental objectives.
- Work without the necessary environmental authorisations or permits.

06.

The Environment and Our Communities



COMMUNITY CHARTER

At Pure DC Group we aim to have a positive societal impact on the communities in which we operate. At each of our sites we will demonstrate to local communities and local people the benefits that a data centre can have, from employment and education to environmental restoration and helping to support people in food poverty. We work with our local teams to gain an understanding of each site's location and its surroundings (local businesses, institutions, and social groups etc.) and the opportunities available for us to give back to local communities.

WE DO:

- Support participation in charitable opportunities and social improvement projects in accordance with our Procurement Policy.
- Encourage all those working for us to be active in their communities and show support.
- Conduct checks to ensure responsible and ethical trading in the workforce and supply chain.
- Co-operate with local communities to maximise social growth and environmental goodness.

WE DO NOT:

- Accept anything in return for charitable contributions.
- Ignore requests or concerns from the community.
- Accept unethical practices that go against our moral obligations with regards to our work force or supply chain.



07. Our Suppliers

Our Suppliers and business partners are essential to our day-to-day business and for us to meet our stakeholders' expectations. It is important that we chose them carefully, use an objective selection process and carry out counterparty due diligence.

We want to work with companies that share our commitment to safety, ethics, and compliance. We also want our suppliers to strive for sustainability in their supply chain, and display innovation and excellence in their delivery.

We communicate our relevant expectations clearly to suppliers and business partners, agreeing contractual obligations where appropriate.

We reserve the right to review our supplier's policies, procedures, and supporting documentation related to compliance with this Code of Conduct and, in some instances, may undertake an on-site assessment of key suppliers to validate adherence. **Suppliers must promptly inform their Pure DC contact or a member of Pure DC management when any situation develops that causes the Supplier to operate in violation of this Code of Conduct.**

We encourage our suppliers to communicate the principles and values set out in this Code of Conduct to their suppliers and to take these principles into account when selecting their own suppliers.

WE DO:

- Treat third-party suppliers fairly with an open tendering process and a clear relationship management process
- Work closely with our third-party suppliers to collaborate and develop high quality products and services, effectively managing risks.
- Provide clear guidance on our payment procedures and pay invoices in line with agreed terms.
- Ask suppliers to raise any potential conflict of interests prior to engagement with us.
- Make channels available for suppliers to raise concerns.

WE DO NOT:

- Tolerate bribery, corruption or collusion in any form in our business.
- Engage or support unfair business and tendering practices.
- Accept or provide gifts or entertainment if the intent is to bias a decision or in return for any business advantage, services, or confidential information.
- Discuss commercially sensitive information (like pricing, costs, or market strategy) with competitors.

Please refer to the Fair Competition section of this Code of Conduct for more information.

08.

Pure DC Ethics



CONFLICTS OF INTEREST

When competing interests might impair our ability to make objective, unbiased business decisions we have a conflict of interest. Our Conflict of Interests Policy sets out our requirements in respect of conflicts of interest, including the requirement for these to be disclosed immediately and the need to always maintain high ethical standards.

WE DO:

- Maintain the highest possible standard of integrity in all business relationships.
- Reject any business practice which might reasonably be deemed improper, reporting any instances promptly to line management.
- Avoid being, or giving the appearance of being, in a position which may result in an actual or perceived conflict of interest.

WE DO NOT:

- Use our authority or position for personal gain.
- Hide or fail to disclose any actual or potential conflict of interest.

FRAUD

Pure DC is committed to acting honestly, fairly and openly in our business activities. We never take part in dishonest or fraudulent activities. We expect all our people, suppliers, contractors, and third-party representatives to uphold these values.

WE DO:

- Make sure our records are accurate, complete and not misleading.
- Query any transactions which do not look right.
- Report any activities or transactions we suspect may be fraudulent.

WE DO NOT:

- Use Pure DC's assets for personal use in breach of policy.
- Falsify expense claims, invoices, inspection reports, financial statements or other company records.
- Ignore something that we suspect might involve fraud, theft or dishonesty.



FAIR COMPETITION

We believe in a fair, open, and honest marketplace and comply with competition and anti-trust laws wherever we do business.

We deal fairly with every customer, supplier and competitor. Our competitive advantage is gained through innovative problem solving and not through actions which would restrict free and fair competition, such as working with competitors to rig bids, exchange sensitive commercial information, fix prices or share markets.

WE DO:

- Stay alert when competitors are present – especially at industry associations and working groups and avoid making inaccurate or disparaging comments about competitors.
- Consult the legal team if we receive any sensitive commercial information about competitors.
- Keep proper records of tender processes and record the source of any information we get about actual or potential competitors.

WE DO NOT:

- Abuse confidential or proprietary information.
- Participate in discussions, or other exchanges or agreements with a competitor (or potential competitor) to fix prices, rig bids, share customers or markets.

SANCTIONS AND TRADE RESTRICTIONS

We comply with all trade laws and restrictions, **including those applicable to import or export**, international sanctions, embargoes and boycotts, as well as anti-money laundering and terrorist financing.

This may include sanctions and trade restrictions which stop us working in certain countries, or with individuals or entities. It can also include restrictions on the export of certain goods and services to some countries.

In accordance with our Anti-Money Laundering and Sanctions Policy we will conduct due diligence to check if any trade restrictions, sanctions, or other embargoes apply.

WE DO:

- Take particular care when working in countries or with companies from countries subject to sanctions or trade restrictions.
- Contact the legal team if we are uncertain about activities involving countries targeted by sanctions or trade restrictions.

WE DO NOT:

- Ignore trade laws and restrictions.
- Disguise the true end-user or end-destination of our goods or services or ignore concerns about the intended use or destination of our goods.

08.

Pure DC Ethics



ANTI-BRIBERY AND CORRUPTION

Pure DC has a zero-tolerance approach to bribery and corruption in all its business dealings and relationships. You have a responsibility to understand and comply with Pure DC's Anti-Bribery and Corruption Policy and to certify this on request from Pure DC.

WE DO:

- Comply with Pure DC's Anti-Bribery and Corruption policy and any supporting guidance provided from time to time.
- Remain vigilant and query any transactions which don't look right, feel inappropriate or aren't supported by receipts or quotations.
- Report any demands for inappropriate payments or other suspicions of bribery immediately.

WE DO NOT:

- Solicit, accept, agree to receive, promise, offer, or give a bribe which includes **Facilitation Payments**, kickbacks and other improper payments or benefit for any reason in any form.
- Permit third parties to be involved in bribery or corruption on our behalf.
- Conceal or fail to keep accurate records of business conversations and activities.

GIFTS, ENTERTAINMENT, AND HOSPITALITY

Pure DC employees and anyone engaged by or on behalf of Pure DC must never accept, offer, or give gifts or hospitality to influence the business decision-making process or cause others to perceive an influence.

The giving and receiving of modest gifts or entertainment is a legitimate part of building good business relationships with customers, suppliers, and other parties. However, if they are disproportionate or inappropriate, they can cloud judgement and can be inappropriate.

All offers and receipt of gifts, entertainment and/or hospitality shall be made in accordance with the Anti-bribery and Corruption Policy and supporting guidance.

WE DO:

- Exercise good judgement at all times.
- Retain accurate and complete records of all gifts, entertainment or hospitality given or received.

WE DO NOT:

- Offer or give gifts or hospitality that is intended as, or may be viewed as, an attempt to improperly influence business decisions.

08.

Pure DC Ethics



CHARITABLE DONATIONS AND SPONSORSHIP

Charitable donations are an important part of our commitment to social responsibility. We ensure all charitable contributions and sponsorship arrangements are made for the right reasons and are not used to influence business decisions.

Charitable contributions are only permitted to charities that are registered under the local country's laws.

WE DO:

- Make sure any charities or organisations we support are appropriate and ensure all donations are given to a registered charitable organisation and not to an individual.
- Ensure any voluntary contributions we make are reasonable in terms of value, frequency, and timing.
- Ensure the recipient of the money and the purpose for which it is to be applied is known before making payment.

WE DO NOT:

- Use charitable contributions to influence a decision, or for any other improper purpose.
- Make any charitable contribution without obtaining written approval in advance.

POLITICAL ACTIVITY

Pure DC is committed to undertaking any lobbying activities in compliance with all applicable laws, and to behaving ethically in all our interactions with governments, agencies, and their representatives.

Whenever Pure DC conducts business or otherwise engages with national or local governments, government agencies, public bodies, state owned companies, and employees and officials of such bodies and organisations, our employees and anyone engaged by or on behalf of Pure DC must apply the highest ethical standards.

WE DO:

- Abide by applicable laws and regulations relating to work with governments.
- Be truthful and accurate when dealing with government officials and agencies and cooperate courteously with officials conducting government or regulatory enquiries or investigations.
- Ensure our actions are legal and above reproach and make it clear when you're expressing your personal views vs. views of the company.
- Always seek advice from the legal department if you think you are, or might be, dealing with a Politically Exposed Person.

WE DO NOT:

- Make illicit or secret payments or transfers of any value to government officials.
- Deviate from contractual requirements without written approval.
- Use agents or other third parties to do anything indirectly on behalf of Pure DC which you would not be permitted to do yourself. For example, making any payments or transfers of items of value through intermediaries, or to a third party, while knowing or suspecting that all or a portion of the payment will go to a government official.
- Ignore or fail to report any concerns you have about improper conduct, corruption, or lobbying activity.

08.

Pure DC Ethics



TAX EVASION

Pure DC has a zero-tolerance approach to tax evasion and will always manage our tax affairs ethically. We also make sure we do not facilitate tax evasion by other parties, even accidentally.

Pure DC complies with all local tax legislation in the countries where we operate and pay the right amount of tax for those activities.

WE DO:

- Manage our tax affairs ethically and in accordance with our tax strategy.
- Report any suspicions that a third party may be evading the payment of tax.

WE DO NOT:

- Help others to evade tax.
- Ignore any suspected tax evasion.

09.

Glossary of Terms



EQUALITY, DIVERSITY AND INCLUSION

Equality, Diversity and Inclusion means preventing the discrimination of a certain person or group differently based on factors such as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

BULLYING AND HARASSMENT

Harassment and bullying means any action or behaviour that any individual or group finds unwelcome, humiliating, intimidating, threatening, violent, hostile or discriminatory. Employees should be particularly sensitive to actions that may be acceptable in one culture but are not in another.

HUMAN RIGHTS

Human rights are the fundamental rights and freedoms which all humans should enjoy. These include the right to life, liberty and security; equal rights of men and women; the right to protection under the law and against discrimination, slavery, torture, or inhumane or degrading treatment, and freedom of speech, thought, conscience and religion.

FRAUD

Fraud is when you deliberately try to deceive someone, act dishonestly or abuse your position to gain any kind of financial or other advantage. Fraud is a criminal offence in most countries. In some countries, you can be prosecuted just for being careless or turning a blind eye to it. Even failing to speak up to clarify a misunderstanding can be considered deceptive.

BRIBERY AND CORRUPTION

Bribery means promising, giving or receiving an unearned financial or other advantage to influence someone's behaviour. One common form of bribery is a kickback – an unearned reward following favourable treatment. Both are corrupt. Whether they are provided to or received from public officials or private individuals, bribes are against the law and against our Code of Conduct. Corruption means dishonest (or unlawful) activity where a person abuses a position of trust in order to achieve personal gain or advantage for themselves or another person. It can involve bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement and/or money laundering.

FACILITATION PAYMENT

Facilitation payments are payments or anything of value ((including, but not limited, to gifts, travel, hospitality, charitable donations, or employment) to induce Officials (including foreign public officials) to perform routine functions they are otherwise obligated to perform. Facilitation payments are a form of bribery. "Officials" include any employee of a government entity or subdivision, including elected officials; any private person acting on behalf of a government entity, even if just temporarily; officers and employees of companies that are owned or controlled by the government; candidates for political office; political party officials; and officers, employees and representatives of public international organizations, such as the World Bank and United Nations.



POLITICALLY EXPOSED PERSON

A politically exposed person (PEP) is someone who has been appointed by a community institution, an international body or a state (including the UK) to a high-profile position within the last 12 months. PEPs can be: heads of state, heads of government, ministers, and deputy or assistant ministers; members of parliament (MPs); members of courts of auditors or of the boards of central banks; ambassadors, chargés d'affaires and high-ranking officers in the armed forces; members of the administrative, management or supervisory bodies of state-owned enterprises; members of supreme courts, constitutional courts or other high-level judicial bodies. PEPs also include: the person's family members; close business associates; beneficial owners of the person's property.

APPROPRIATE USE OF IT SYSTEMS

Company computer systems are information and communication technology, systems and equipment that are owned or used by Pure DC. These can include laptops, desktops, servers, telephones, mobile phones, USB or other portable memory sticks, handheld devices, or other similar items.

DATA PRIVACY

Data protection and privacy laws regulate the treatment of personal information. Wherever we hold and use personal information we must always comply with relevant data protection laws, while also complying with Pure DC's own standards and policies on protecting personal information, as well as those of our customers. Personal information is anything which can identify a living person, which can include their name, a photo, social security numbers, and other relevant information including expressions of opinion about the person and statements of our intentions towards them.

Sensitive personal information includes information about racial or ethnic origin; political opinions; religious beliefs or other beliefs of a similar nature; trade union membership; physical or mental health or condition; sexual life, or the commission or alleged commission of any offences.

