

Team Defence Information

Code of Ethics and Compliance Policy

1. **INTRODUCTION:** The Code of Ethics and Compliance Policy ("Policy") outlines the principles and standards of conduct expected from all employees, officers, directors, and representatives of UKCeB trading as Team Defence Information (hereinafter referred to as "the Company"). This Policy serves to uphold the highest ethical standards and ensure compliance with applicable laws, regulations, and internal policies.
2. **ETHICAL STANDARDS:**
 - a. Integrity: Conduct all business with honesty, integrity, and transparency.
 - b. Respect: Treat all individuals with dignity, respect, and fairness, regardless of differences.
 - c. Confidentiality: Safeguard confidential information and respect the privacy rights of stakeholders.
 - d. Professionalism: Uphold professional standards and avoid conflicts of interest.
 - e. Accountability: Take responsibility for actions and decisions, and strive for excellence in performance.
 - f. Compliance: Adhere to all applicable laws, regulations, and Company policies.
3. **COMPLIANCE WITH LAWS AND REGULATIONS:**
 - a. Legal Compliance: Comply with all applicable laws, regulations, and governmental requirements in all jurisdictions where the Company operates.
 - b. Anti-Bribery and Corruption: Prohibit bribery, corruption, and improper payments in all business dealings, whether involving public officials, private individuals, or commercial entities.
 - c. Data Privacy and Security: Protect personal and confidential information in accordance with data protection laws and Company policies.
 - d. Export Controls: Comply with export control laws and regulations governing the export, re-export, and transfer of goods, services, and technology.
 - e. Competition Law: Avoid anti-competitive practices and comply with competition law principles to ensure fair competition in the marketplace.
4. **CONFLICTS OF INTEREST:**
 - a. Disclosure: Promptly disclose any actual or potential conflicts of interest to the appropriate authority or compliance officer.
 - b. Management: Take appropriate steps to manage conflicts of interest in a transparent and ethical manner, including recusal from decision-making processes when necessary.
5. **GIFTS, ENTERTAINMENT, AND HOSPITALITY:**
 - a. Guidelines: Accept gifts, entertainment, and hospitality from business partners, suppliers, or customers only in compliance with Company policies and industry standards.
 - b. Transparency: Disclose any gifts, entertainment, or hospitality received or offered in connection with Company activities.

6. REPORTING VIOLATIONS:

- a. Reporting Mechanism: Report any suspected violations of laws, regulations, or Company policies through established reporting channels, such as the Company's whistleblower hotline or compliance officer.
- b. Non-Retaliation: The Company prohibits retaliation against individuals who report violations in good faith.

7. TRAINING AND AWARENESS:

- a. Training: Provide training and awareness programs to educate employees on ethical standards, compliance requirements, and reporting procedures.
- b. Communication: Regularly communicate updates to policies, procedures, and compliance requirements to ensure awareness and understanding among employees.

8. MONITORING AND AUDITING:

- a. Monitoring: Implement monitoring and auditing mechanisms to assess compliance with this Policy and identify areas for improvement.
- b. Corrective Action: Take prompt corrective action in response to identified compliance issues or deficiencies.

9. DISCIPLINARY ACTION:

- a. Enforcement: Violations of this Policy may result in disciplinary action, up to and including termination of employment or contractual relationship.
- b. Consistency: Disciplinary actions shall be applied consistently and in accordance with Company policies and applicable law.

10. **REVIEW AND UPDATES:** This Policy shall be periodically reviewed and updated as necessary to reflect changes in laws, regulations, and business practices.

11. **ACKNOWLEDGMENT:** By virtue of their employment or engagement with the Company, employees, officers, directors, and representatives acknowledge receipt of this Policy and agree to abide by its provisions.

IN WITNESS WHEREOF, the undersigned hereby execute this Code of Ethics and Compliance Policy as of the date first written below.

UKCeB trading as Team Defence Information

By: Phil Williams, MD [Authorized Signatory]

Date: 1 October 2021

Review Date:

1 October 2022 – Reviewed

1 October 2023 – Reviewed

1 October 2024

3 August 2026 - Reviewed