Code of Conduct

Computools LLC is committed to maintaining the highest standards of transparency, ethical behavior, honesty, and integrity in all business dealings with clients, partners, government bodies, and among employees. This Code of Conduct sets forth the principles and expectations for employee behavior and applies to all team members (referred to as "you") across all locations and functions, both internal and external to the organisation.

1. Workplace Conduct

Safe and Inclusive Work Environment

Computools LLC maintains a zero-tolerance policy toward any form of violence, intimidation, or disrespectful behavior. All employees must act with professionalism and respect toward colleagues, clients, and external partners.

Any threats, harassment, or unsafe conduct should be reported immediately.

Drug-Free and Alcohol-Free Workplace

Computools prohibits the use, possession, or distribution of illegal drugs, alcohol, or other controlled substances during working hours or in any work-related setting (including remote work). This ensures a safe and productive work environment.

Violations may result in disciplinary action, up to and including termination.

2. Equal Opportunity and Anti-Harassment

Computools LLC provides equal employment opportunities regardless of race, religion, color, national origin, gender, age, disability, sexual orientation, gender identity, or any other protected status.

All employment decisions are based on qualifications, performance, and business needs.

Zero Tolerance for Harassment

Harassment of any kind—verbal, physical, visual, or sexual—is strictly prohibited. This includes offensive jokes, slurs, inappropriate messages, gestures, or any conduct that creates a hostile or uncomfortable work environment.

All complaints will be treated seriously and confidentially. Violators are subject to disciplinary action, including dismissal.

3. Confidentiality and Data Protection

Employees must safeguard all confidential information related to Computools LLC, its clients, partners, and projects. This includes business strategies, source code, financials, proprietary technology, and client data.

Employees may not share or disclose confidential data unless authorised and required for work-related purposes. Obligations continue after employment ends, typically for a period of three years, or as contractually specified.

Data Privacy

Computools complies with U.S. data protection regulations and international frameworks such as the General Data Protection Regulation (GDPR) and California Consumer Privacy Act (CCPA) where applicable. Employees handling personal or sensitive data must ensure its secure processing, storage, and transfer

4. Use of Information Technology and Social Media

Employees are expected to use company systems—including hardware, software, and networks—solely for legitimate business purposes. Misuse, including unauthorised access, distribution of malware, or use of pirated software, is prohibited.

On social media, employees must not make defamatory, illegal, or misleading statements, or present personal opinions as official company views. When discussing professional topics publicly, proper disclaimers should be used.

5. Conflicts of Interest

A conflict of interest arises when personal or financial interests interfere—or appear to interfere—with your responsibilities at Computools.

Employees must disclose any potential or actual conflicts of interest to their supervisor. This includes involvement in outside employment, business relationships with clients/vendors, or financial investments that may influence decision-making.

6. Financial Integrity and Recordkeeping

Employees involved in financial operations must ensure that records are accurate, complete, and compliant with applicable U.S. GAAP standards and tax regulations.

Falsifying time records, misreporting project hours, or altering financial documentation is strictly prohibited and may result in civil or criminal liability.

7. Protection of Company Assets

Computools provides its employees with access to tools, equipment, intellectual property, and systems necessary for work. These assets must be used responsibly and solely for company-related purposes.

Upon departure, employees must return all company equipment and data, and may not retain confidential materials

8. Intellectual Property (IP) and Ownership Rights

All code, designs, documentation, and deliverables created in the course of employment are the sole property of Computools LLC or its clients, as agreed in contracts.

Employees must respect third-party IP and avoid any unauthorised use of copyrighted or proprietary material.

9. Insider Trading

Employees in possession of non-public, material information about Computools or its clients may not buy or sell securities based on that information, nor share it with others. Violations may be subject to U.S. securities law penalties.

10. Fair Competition and Antitrust Compliance

Computools conducts business fairly and transparently. Employees must not engage in practices that restrict competition, such as price-fixing, bid rigging, or collusion with competitors.

Any suspected violation of U.S. antitrust laws or other laws must be reported immediately.

11. Export Control and Sanctions Compliance

Computools complies with U.S. export control laws, including regulations administered by the Bureau of Industry and Security (BIS) and the Office of Foreign Assets Control (OFAC).

Employees must not transfer technology, software, or services to sanctioned countries or entities without prior authorisation.

12. Anti-Bribery and Corruption

Computools strictly prohibits bribery and corruption in any form. Employees must not offer or accept any payment, favor, or benefit intended to influence a business decision.

We comply with the U.S. Foreign Corrupt Practices Act (FCPA) and other anti-corruption laws in jurisdictions where we operate.

13. Client and Vendor Relations

Employees must maintain professional, ethical, and transparent relationships with clients, suppliers, and vendors. Any behavior that might suggest favoritism, bias, or undue influence must be avoided.

All procurement and client engagement processes must comply with internal policies and legal obligations.

14. System Integration and Project Management

As an IT service provider, Computools ensures all client projects are executed in line with industry standards. Employees must follow best practices in project management, documentation, and communication.

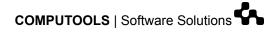
Deliverables must meet defined requirements, deadlines, and quality benchmarks.

15. Reporting Violations

Employees are encouraged to report any suspected violations of this Code in good faith. Computools maintains a no retaliation policy for whistleblowers.

Reports may be submitted to:

- Your direct supervisor
- Anonymous reporting channel (if applicable)



All reports will be investigated confidentially and addressed promptly.

Compliance with this Code of Conduct is a condition of employment. Failure to uphold these standards may result in disciplinary action, up to and including termination and legal consequences.

Last update: June 01, 2025.