

All Company directors, officers, management personnel, and employees will receive a copy of this code at the time they join the Company and will receive periodic updates.

### **Monitoring Compliance**

Compliance is, first and foremost, the individual responsibility of any person within Socrates & Soc. Whether you are an employee, director, contractor, supplier or otherwise a member of the Socrates & Soc family, you are encouraged to promptly report any practises or actions that you believe to be inappropriate. You can report suspected Code violations to your immediate supervisor, manager or other appropriate persons within the Company. If the normal chain of command for whatever reason may not be used for reporting suspected violations of the code, you should forward an anonymous letter to the secretary of the Company. The Secretary of the Company has been instructed by the board of directors to register all complaints, brought anonymously or otherwise, and direct those complaints to the appropriate channels within the Company.

In all cases, employees will be subject to no retaliation or other adverse consequence for making a good faith report for a potential code violation. Their confidentiality will be protected to the extent possible, consistent with law and corporate policy. Any supervisory personnel who retaliates against an employee as a result of such employee's report of an alleged violation of law or Company policy shall be subject to disciplinary action.

### **Disciplinary Actions**

The Company uses a system of progressive discipline. The company will generally issue warnings or letters of reprimand for less significant, first-time offences. Violations of a more serious nature may result in suspension without pay, reduction of bonus and other similar penalties and termination of employment is generally reserved for serious breaches such as theft, or other violations amounting to a breach of trust.

### **Signature and Acknowledgment**

All new employees must sign an acknowledgment form confirming that they have read the code and understood the requirements of the Code of Conduct and the policies contained therein, and that they comply with the Code.