

Code of Ethics & Professional Conduct

WestNet Consulting Services, Inc.



Effective 2/9/2015



WestNet has adopted this Code of Ethics and Professional Conduct Policy for use by its employees. Every employee must familiarize himself with this policy and follow it all the times when doing business or interacting with clients and the public.

This policy is a guide for making sound decisions. It provides information, support and resources to help us act ethically and to comply with the local laws and regulations and is evaluated on annual basis to ensure its adequacy and relevancy.

If you become aware of an actual or potential violation of this Code, another corporate policy or any applicable law or regulation, you are strongly encouraged to report it to your manager or HR person promptly, where allowed by applicable law.

Any violation of a law or regulation also will be considered a violation of our code.

The Following ethical principles have been adopted by WestNet

Honesty and Integrity — "Always do the right thing."

• We are straightforward and honest in our professional and business relationships.

Professional Behavior — "We operate within the letter and the spirit of applicable laws."
We comply with professional standards and applicable laws and regulations.

Competence — "We bring appropriate skills and capabilities to every engagement."
We understand that our clients expect our work to meet high professional standards.

Objectivity — "We are objective in forming our professional opinions and the advice we give."
We do not allow bias, conflicts of interest, or accept influence of others to override our professional judgments.

Confidentiality — "Confidentiality is a top priority"

• We don't disclose any client information to anyone inside or outside our company without the legal or professional right to know.

Fair Business Practices — "We are committed to fair business practices."

• We respect our competitors and do not compete unfairly.

Respect and Fair Treatment — "We treat all our colleagues and clients with respect, courtesy, and fairness."

• We value the diversity of people, viewpoints, talents, and experiences and promote equal opportunity for all.



Serving our Clients and Business Partners

At WestNet there is no room for unfair or unethical business practices, we stay honest in all of our sales and always put the client's best interest ahead of ours. We only offer services that we are competent to perform. We are committed to properly record hours worked and expenses incurred during client engagements.

We give clients a fair recommendation for a products or services regardless of our own self-interest.

Payment Card Industry (PCI) Assessment and Reporting Policies

We do not perform any PCI Assessments of entities that we have control or any financial interest in.

We will fully disclose in the Report on Compliance any security-related devices or security-related applications that have been developed or manufactured by us, or to which we owns the rights to, or that we have configured or manage.

We do not offer or provide any gifts, gratuity, service, or other inducement to any employee of PCI SSC or any QSA subject or agency involved in retaining the QSA, entering into the QSA Agreement or to provide QSA-related services.

We do not use our status as a "listed QSA" to market services unnecessary to bring clients into compliance with the PCI Data Security Standards (DSS).

We do not misrepresent requirements of PCI DSS in connection with promotion or sales of services to our clients.

We never state or imply that the PCI DSS requires usage of our products or services. When we recommend remediation actions that include one of our own solutions or products, it also recommend other market options that exist.

Protecting Confidential Information

We are committed to preserve the confidentiality of information obtained in client service. Information of a confidential, private and sensitive nature is used responsibly and controlled and protected.

We never share any non-public information of our clients with a third party or any colleague who does not have a business need to know it.

We do not store any customer data on internet accessible systems. Any electronic media containing client, employee and other confidential data is kept in

encrypted storage repository only authorized personnel with approved key-management procedures is allowed to decrypt media as needed.

Any hardcopy is locked with traditional lock and key and electronic access control system.



Respecting Our Coworkers

We treat one another with respect and maintain a comfortable and professional atmosphere. Together we strive to create a workplace that is free from discrimination and harassment.

We recognize and protect the confidentiality of employee medical and personal information. Such information will not be shared or discussed inside or outside our company except as required by law or appropriate legal process, or in connection with an appropriate, lawful business use or as authorized by the employee.

