



Internet and E-Mail Policy

General

Internet and e-mail play an increasingly active part in both our professional and personal lives. Whilst the ability to access the internet for personal reasons is clearly of use to Employees, such access is provided for business purposes only.

To ensure optimum use of our internet communication link (through which our e-mail is also sent and received) and to enable us to maintain acceptable levels of service, the following rules must be adhered to:

Internet

Internet access is provided to each Employee for business purposes. If employees wish to use internet access for personal reasons, they should keep on-line browsing and the number of websites visited to a minimum and outside of normal business hours. Bear in mind at all times that when using an internet site user's identity (which is linked to Northwards') may be logged.

Accessing "adult" sites is strictly forbidden, as is the accessing, downloading, uploading or transmitting of obscene, pornographic or other material which is likely to cause offence to any person or likely to have negative repercussions. In particular you must not upload, download, use, retain, distribute or disseminate any images, text, materials or software which:-

- Are or might be considered to be indecent or obscene
- Are or might be offensive or abusive in that its content is or can be considered to be a personal attack, rude or personally critical, sexist, racist or generally distasteful
- Encourage or promote activities which make unproductive use of your time – for example, engaging in "flame wars" (i.e. provocative exchanges of e-mail messages which escalate and often become offensive)
- Involve activities outside the scope of your responsibilities – for example, unauthorized selling/advertising of goods and services
- Might affect or have the potential to affect the performance of, damage or overload the Systems, network and/or external communications in any way
- Might be defamatory or incur liability on the part of Northwards or adversely impact on the image of Northwards.

This Policy must be followed at all times and it applies to the use of all computer equipment and facilities, whether or not they are part of or connected to the network.

Caution must be exercised when downloading business related files from the internet, as such files may be a source of computer viruses or other harmful things. Downloading non-business related files is not permitted.

Enquiries and on-line transactions made via the internet will normally require you to specify your e-mail address. If such usage is of a personal nature, employees are not permitted to use their Northwards' e-mail address. Employees must therefore make alternative arrangements and/or obtain their own home/personal e-mail address to use.

Specific compliance procedures and instructions in relation to use of the internet must be adhered to at all times.

Access provided to employees through the internet for on-line services (including, without limitation, banking and ordering of goods and services on-line) is provided at entirely their own risk and Northwards assumes no liability for employees accessing these services through its systems. Employees should be aware that in some cases internet access is not secure and if personal details are sent over the worldwide web these may be intercepted by someone other than the intended recipient.

E-Mail

Messages employees send and receive using Northwards' e-mail systems must relate only to our business activities. Employees are not permitted to use their company e-mail address on public boards, internet chat-rooms, discussion forums etc.

Care should be taken when using e-mail because e-mail messages are perceived to be less formal than paper-based communication and there is a tendency to be more relaxed about their content. Bear in mind that all expressions of fact, intention and opinion via e-mail can be held against you and/or Northwards in the same way as verbal and written expressions or statements and that legally-binding contracts may be formed via e-mail. Do not include anything in an e-mail which employees cannot or are not prepared to account for.

It is good practice to re-read each e-mail in hard copy before sending it. One cannot prevent the delivery of an e-mail once it has been dispatched. Abrupt, inappropriate and thoughtless use of language can lead to a bullying tone and possible offence to others – even harassment. For example, e-mails sent in large font or capitals are often interpreted as shouting. Consider whether a 'phone call may be a better way of discussing a complex, sensitive or confidential matter.

E-mail messages which have been deleted from Northwards' systems can still be traced and retrieved using forensic search programs. Therefore, all persons having a part in creating or forwarding any offending e-mail can be identified. E-mails, both in hard copy and electronic form, are generally admissible as evidence in a court of law.

Sending or distributing a message or material which is obscene, pornographic, defamatory, harassing or otherwise illegal, or likely to cause offence to any person is strictly forbidden. Where a message or material of such nature is received, notify the

sender immediately that employees do not wish to receive messages or material of such nature. The message and/or material must then be deleted from Northwards' systems.

Where non-business related e-mail attachments are received, they should be deleted immediately and completely without opening. They are often a source of computer viruses and other harmful things. Onward distribution or forwarding of these e-mails with their attachments to any other person (internal or external) is not permitted.

Do not make any personal statements on behalf of Northwards which do or may defame libel or damage the reputation of any person. Any external e-mails employees send will have a disclaimer automatically attached to it.

Specific compliance procedures and instructions issued in relation to the use of e-mails must be adhered to at all times.

Confidentiality

All information relating to business activities is confidential. Employees are expected to treat electronic information with the same care as they would paper-based information which is confidential. Keep all such information secure, use it only for the purpose(s) intended and do not disclose the same to any unauthorized third party (which may sometimes include other employees).

Monitoring and Enforcement

Internet browsing, downloading files, the sending and receiving of e-mail and related activities will be randomly monitored so as to ensure optimum use of our internet communication link and compliance with policies, applicable laws, and regulatory guidance and also to determine the relevance of any communication to business activities.

In addition, Northwards reserves the right to monitor, access, retrieve, renew and delete (as appropriate) the following, without notifying the individual concerned:-

1. all e-mail sent, received or in the course of composition whether or not you are present in the office
2. all use of the internet and all other communication techniques deployed by you using the Group's systems
3. any third party screen savers, software, materials on Northwards' systems

therefore, employees should have no expectation of privacy when using Northwards' e-mail and internet.

Northwards also reserves the right to withdraw any of the facilities provided if it considers that your use of it is in any way unacceptable. Contravention of these rules may also lead to the withdrawal of internet access and/or the ability to send e-mail.

If employees ignore the rules and guidance set out above or misuse and/or abuse the systems, its facilities or any property belonging to Northwards they will be liable to disciplinary action. It may also lead to summary dismissal in serious cases.

Northwards will take any breach of these rules very seriously. At the same time, employees' conduct and/or action(s) may be unlawful or illegal and they may be personally liable.