

INet Inc.
Code of Conduct

Adopted by the Board of Directors on June 29, 2007

INTRODUCTION

INet is committed to conducting business in a fair, honest and sound manner to help assure that the long term interests of its shareholders are being served.

As part of this commitment, this Code of Conduct sets out the policies and procedures for the fair and honest business practices and behavior that INet expects from its staff.

This Code applies to all INet employees, contractors, officers and members of the Board of Directors, who are referred to below as “**Employees**”.

INet’s guiding principles on business ethics and conflict of interest are:

- **Business Ethics:** It is INet’s policy to comply both with the letter and the spirit of all laws to which it is subject, wherever INet does business. INet also expects its Employees to conduct all business on behalf of INet in a manner consistent with the highest ethical standards.
- **Conflict of Interest:** INet expects undivided loyalty from its Employees. INet employees may not engage in any activity which could conflict with INet’s business interests, which would adversely affect its reputation or which would interfere with the fulfillment of the responsibilities of the Employee’s job, which at all times must be performed in the best interest of INet. Employees may not use their position with INet, or INet’s information assets, for their personal gain or for improper benefit of others.

It is not possible to list all rules regarding business ethics or conflict of interest. In those circumstances in which no guidance is specified, individual conscience, common sense and the adherence to principles of honesty and fairness should prevail in the conduct of INet’s business.

Set out below are more details on these guiding principles.

BUSINESS ETHICS

Compliance with applicable law

An Employee must take no action on INet’s behalf which the Employee knows, or suspects that it violates any applicable law or other act. While we must compete vigorously, we must at the same time do in such strict compliance with all the laws and other acts that apply to us.

INet and its Employees may not assist any other Employee or a third party in violating any law.

Observance of moral and ethical standards of society

In addition to full compliance with all laws, each INet employee must comply with the moral and ethical standards of local society, including but not limited to the Macedonian ones.

True and accurate communications, business records and public reporting

Employees must be truthful in all communications with one another, our customers, internal and external auditors, governmental agencies, and third parties. Employees must maintain truthful business records that accurately and fairly reflect INet business and financial transactions. Employee must not falsify or forge any business records.

INet shall at all times provide full, fair, accurate, timely and understandable disclosure in report and documents that it files with, or submits to any regulatory authorities, and on other public communications made by INet.

The Chief Executive Officer, and other members of the Company Management Team bear a special responsibility to help and ensure that a culture exists throughout INet as a whole that assures the full, fair, accurate, timely and understandable reporting of INet's financial results and condition.

No bribes and illegal payments

INet will not tolerate, and no Employee may pay, offer or authorize any bribe or any other unlawful payment on behalf of INet.

Bribery is giving of money or anything else of value in an attempt to influence the act or decision of a public official, or to induce the public official to influence any act or decision of the government, to assist INet in obtaining or keeping business. These prohibition extends to consultants, agents or other intermediaries when the Employee has a reason to believe that some part of the payment or "fee" will be used for a bribe or otherwise to influence government action. Any Employee with knowledge of a request for payment of a bribe must immediately disclose the information to the CEO.

CONFLICT OF INTEREST

A conflict of interest exist when an Employee's duty to give undivided business loyalty to INet ca be prejudiced by actual or potential personal benefit from other source. All circumstances of conflict of interest, including the ones specified below, should be avoided.

If an Employee has a doubt about whether an activity may create a conflict of interest, the Employee must report that activity to the CEO.

Loyalty to INet

No Employee should be subject, or even appear to be subject, to influences, interests or relationships which conflict with the best interests of INet. This means avoiding any activity which might compromise or seem to compromise INet or the Employee, or bring embarrassment to or adversely affect the reputation of INet or the Employee.

Dealing with suppliers, customers and others – gifts, meals, entertainment and payment

All contacts and dealings with customers, suppliers, and potential suppliers must be conducted so as to avoid even the appearance of impropriety or violation of any applicable law or any other act or this Code.

General policy

Employees may not offer, ask for, provide or accept anything of value either for themselves or for others in return for favorable treatment from INet, customers, suppliers, or potential suppliers, or others.

No interests in competitors or certain others

No financial interests in suppliers, customers, and competitors

No Employee may have any direct or indirect interest in any organization which is seeking or doing business with INet or which is competitor to INet. This means for example, that no Employee may be an investor or own shares in an INet competitor, supplier or customer.

Certain prohibited second job employment

Employees must not accept employment with, or act as consultants or agents for, an INet customer, supplier or competitor. An Employee's personal transactions with INet customers, suppliers or competitors must not involve the use of Company time, property or information, and must be on non-preferential terms and independent of any relationship with INet.

Business opportunities

Employees must not take advantage of an opportunity for personal gain that rightfully belongs to INet. If an INet Employee becomes aware of a business opportunity that might fall within INet's business purpose and practice,

the Employee must inform the CEO of the business opportunity. Employees must not sell their own services or products, or those of another person or firm, if INet offers similar services or products.

No personal appropriation of INet property

No Employee may without proper authorization use or permit others to use INet property or services for personal purposes or their own personal benefit. The unauthorized removal of INet material, equipment or supplies, or unauthorized use of INet property is treated as theft.

The submission of a fraudulent expense report and the misuse of INet-issued credit and telephone cards are treated as theft. Each Employee is expected to use the same care for INet's property as he or she would if it were the Employee's own property.

Employees who are authorized to charge amounts directly to INet, using INet credit cards, fuel cards or INet provided phone access cards, may use such accounts for INet business purposes only and must also take appropriate precautionary measures to protect such cards against loss or abuse.

GENERAL PROVISIONS

Employees are prohibited from acting indirectly through friends or family

An Employee who tries to or takes actions prohibited by this Code indirectly through a friend or a family member, will be subject to disciplinary measure, up to, and including termination as if the Employee had tried or had taken the action directly.

Violation of the Code

INet will take immediate disciplinary actions, up to and including termination, of any Employee who violates this Code or whose relatives violate this Code. In addition, INet reserves the right to take all appropriate legal actions in connection with violations of this Code, including, but not limited to, the initiation of criminal prosecution

Procedure for enforcement

Except as otherwise provided in this Code, the CEO shall be responsible for enforcement of this Code.

No retaliation

INet will not engage in or tolerate retaliation against an Employee who has reported a potential violation under this Code or cooperated with an investigation into reported misconduct. However, filling a report which the Employee knows to be false is prohibited and subject that Employee to an appropriate discipline procedure which could include termination.