

# Code of Business Conduct and Ethics

Wireless CCTV Ltd (WCCTV) conducts its activities on the basis of honesty, integrity, loyalty, and openness, with respect for human rights and the legitimate interests of its employees, its stakeholders, and the communities in which it operates.

# **Employees**

We aim to create safe and healthy working conditions for all employees. WCCTV is committed to offering employees a working environment based on mutual trust, in which people treat each other with respect and in which everyone feels responsible for the results and reputation of our company.

We will recruit, hire, and promote employees solely on the basis of their skills and capabilities, which are relevant to the job. We respect the dignity of the individual and your right to freedom of association. We will ensure effective communication with our employees by putting information and consultation procedures in place.

#### **Products And Services**

WCCTV aims to bring high-quality products and services onto the market.

#### **Business Partners**

WCCTV aims to maintain mutually beneficial relationships with its suppliers, customers, and business partners. We expect our partners in business dealings to apply rules of conduct that are consistent with our own.

#### **Commitment to the Community**

Based on its awareness that as a company it is an integral part of society, WCCTV aims to live up to the responsibilities that this entails – to society as a whole and specifically to the communities in which it operates.

# **Social Activities**

WCCTV will cooperate with governments and other authorities, both directly and through trade organisations, in the development of legislation that may affect its lawful commercial interests. WCCTV does not support any political parties or politicians and will not make any contributions to the funds of groups that pursue party interests.

#### The Environment

WCCTV seeks to continuously improve the way it manages the effects of its activities on the environment and aims to develop sustainable operations over the longer term.

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## Competition

WCCTV believes in tough but fair competition and supports the development of suitable legislation in this area. WCCTV and its employees will act in accordance with the principles of fair competition, applicable regulations, and internal policies.

## **Commercial Integrity**

WCCTV neither directly nor indirectly, gives or receives bribes or other improper benefits. Employees are not permitted to offer, give, or receive any gift or payment that constitutes bribery or could be interpreted as such. All requests for or offers of bribes must be rejected immediately and reported to management.

The financial administration and supporting documents must accurately describe and reflect the nature of the underlying transactions. No secret or unregistered accounts, sums of money or assets will be established or held.

#### **Conflicts Of Interests**

WCCTV employees are expected to avoid any personal activities and financial interests that could conflict with their responsibilities to the company. Our employees are forbidden from abusing their positions to pursue any benefit for themselves or others. Employees are expected to be open and transparent and to discuss any commercial side activity or benefit with senior management.

#### **Company Resources**

Company resources may only be used for their intended business purpose, unless management has given prior written approval for other uses (e.g., private use).

## **Confidential Information**

Employees must treat information that is confidential in a careful and professional manner and take reasonable measures to safeguard its confidentiality.

#### Compliance with the Law

WCCTV and their employees are obliged to adhere to both the letter and the spirit of applicable laws and regulations as well as internal policies, including this Code of Business Conduct.

## Compliance

Compliance with this Code of Business Conduct is essential to our success as a company. The Code cannot answer every question that arises in day-to-day situations; therefore,

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each employee must use common sense and professional judgement at all times. When in doubt, they must consider whether our values of honesty, integrity, loyalty, and openness provide the answer. If not, they should discuss their concerns with senior management.

The values we share help make our company a great place to work. Trust, honesty and respect for each other, our customers and suppliers determine how we behave and how we do business. We also want to meet society's expectations: to be transparent and in compliance with legal requirements. In other words, we want to do good business – at all times.

Your role is important. Please talk to us if you have any concerns about workplace practices. Speak to you manager and HR. They are there to listen and to help you. If you've already tried that and felt you are not being heard, you can contact one of the company Directors.

## How can you report your concerns?

Speak to your Manager or HR.

## What happens after you report your concerns?

All concerns that are made are sent to one of the Directors. The concerns are carefully assessed and passed on to the right person to deal with them – and NOT to someone who may be part of the problem.

# How safe is your job?

Your personal integrity means a great deal to us. It is a building block of our integrity as a company. By reporting your concerns, you help us do good business. We guarantee that your concerns will be treated with respect and dealt with at whatever level needed to ensure your interests are protected. Everything possible will be done to safeguard your position.

#### Do I get feedback?

Yes, you will be contacted directly, if we need more information from you, you will be asked for it.

#### We encourage you to talk to us about things like:

- Conflicts of interest
- Confidential information being disclosed
- · Intellectual property rights being violated
- Fraud
- Theft
- Environmental, health, or safety issues

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- Bribes being offered or accepted
- Discrimination or exclusion
- Intimidation or harassment
- Exploitation
- Alcohol or drug abuse
- Any violations of company policies or procedure

Remember, your manager and HR are there to listen and to help you. Speak to them first.

David Gilbertson - Chief Executive Officer