

NETCEED CODE OF CONDUCT

CEO Message

At NETCEED, we believe that the people who work for us, directly or indirectly, are our most important asset. You are our ambassadors and your actions and behaviour represent the way we do business. Your daily commitment to adhere to NETCEED's Code of Conduct helps to maintain our positive reputation and keeps us operating to the highest standard.

As such, we must work responsibly, with honesty and integrity, and in compliance with all applicable laws and regulations. These concepts are embedded in our core values where ethical, fair business practices, and respect for people and the environment are our foundation.

The NETCEED Code of Conduct is an essential guide to what the company expects of you and, just as importantly, what you should expect of the company if you have a problem or doubts about how to handle a difficult situation. The Code of Conduct is your guide for ensuring that NETCEED conducts business with integrity, and sound business practices, while fostering trusting relationships with its employees, commercial partners, shareholders, and government authorities. Our conduct impacts our reputation, public confidence in our business, and our financial strength.

It is your responsibility to ensure you have read and fully understand the contents of this document. It is your responsibility to comply with the principles set out in our Code of Conduct. Violations of the Code of Conduct can put you, your colleagues, our business, and our customers at risk. This document should be read in conjunction with the employee handbook, where applicable.

Please remember, it is our individual commitment to the company's values, purpose, principles, and standards that safeguards our ability to do business successfully.

Alper Turken
CEO

NETCEED'S VALUES

We take ownership

While we operate at the leading edge of technology, people are at the heart of all we do. That's why we believe in empowering our teams with the authority to act and the support to succeed. We trust our teams to make smart choices that deliver results – for our customers, our company, and the planet. And we extend the same mindset to our partners and customers – empowering them with the data, tools and insights to achieve more.

- Adding value with expert teams
- Investing in relationships to deliver success
- Always keeping the end-user in mind

We act responsibly

Responsibility isn't just a principle, it's our promise. We care deeply about what is in the customer's best interests. That's why we hold ourselves to the highest standards – not just when everything is running smoothly, but also when challenges arise. When we commit to something, we see it through with determination and integrity. If we spot a problem – we own it, we act on it, and we solve it. That's why our customers know they can rely on us to deliver. Every time.

- Embracing responsibility
- Owning problems and solving them – fast
- Trusted by customers to always get the job done

We create solutions

At Netceed, we work across the globe, bringing together the brightest minds in the industry to solve complex challenges and shape smarter solutions. Our forward-thinking teams transform their unmatched technology and engineering capabilities into scalable solutions that fuel progress for our clients. By connecting expertise with purpose, we are not just leading our industry, we are building the connections that are moving the world forward.

- Sharing knowledge to fuel innovation
- Working with the industry's brightest minds
- Empowering clients with insights to make informed decisions

We win together

At Netceed, success is a shared journey. Working side-by-side with our partners and clients, we unlock greater potential and deliver lasting impact. Collaboration is in our DNA. By bringing together diverse talents, perspectives, and expertise we're able to guide our clients and create sustainable solutions. Together, we celebrate every win and learn from every challenge. Because when we build connections rooted in collaboration, we don't just achieve results, we redefine what is possible.

- Guiding clients with expertise
- Creating sustainable results for all
- Encouraging open-minded collaboration and mutual support

Introduction and Responsibilities

The NETCEED (“NETCEED” or the “Group”) Code of Conduct (“Code”) defines our core principles for doing business and managing our operations in an ethical way that supports our values, commitment to business integrity, and compliance with legal requirements.

The Code applies to all entities within NETCEED, and their directors, officers, employees, and other associated persons of the Group (collectively, “Group Personnel”).

We will take all reasonable steps to ensure that our business partners, including joint venture partners, suppliers, agents, representatives, and advisors, act in a manner that is consistent with the spirit of this Code in their dealings with and on behalf of NETCEED. This Code of Conduct (hereinafter the “Code”) is an addition to the Internal Regulations (hereinafter the “Regulations”) of each NETCEED entity and does not replace existing Regulations and applicable local legal provisions.

This Code of Conduct will also be displayed at NETCEED’s premises or will otherwise be made available on the intranet. The Code will also be posted and filed with the clerk of the Labor Court and a Works Council notice will be made available as necessary.

A. Personal Responsibility

As an employee, you are required to read and familiarize yourself with this Code and:

- Act in a manner that is safe, ethical and consistent with our values and applicable laws and regulations;
- Ask questions if you are unsure of your responsibilities or the correct course of action to take;
- Report any concerns or possible breaches of the Code in accordance with this Code’s provisions;
- Cooperate fully in any internal or external investigation, if requested to do so; and
- Attend training as required by your job function and certify annually that you have acted in accordance with our Code.
- Treat colleagues, customers, and partners with respect, courtesy, and professionalism at all times. Avoid behaviors that could be perceived as discriminatory, aggressive, or disrespectful.

B. Responsibility of Managers

Employees who are responsible for the management of others are required to act as positive role models and support team members and application of the Code by:

- Ensuring they receive new employee appropriate training;
- Demonstrating consistent, transparent, and fair decision-making in all areas of responsibility, including hiring, performance reviews, and conflict resolution.
- Creating an environment that is safe, respectful, and inclusive;
- Avoiding misuse of positional power, favoritism, or any behavior that undermines trust or morale. Managers must act with professionalism, respect,

- and integrity at all times;
- Encouraging open dialogue, continuous feedback, and a learning mindset within their teams. Act promptly and supportively when concerns or suggestions are raised Ensuring that no one experiences retaliation for speaking up or cooperating in an investigation in good faith;
- Supervising Group Personnel and monitoring business activities; and
- Appropriately reporting any potential breaches of the Code (consistent with the reporting obligations set forth in the “Monitoring and Reporting” section of this Code and via the channels mentioned in the Speak Up Policy).

Managers must recognize that “tone at the top” matters, their behavior sets the standard for ethical and sustainable conduct across the company.

Questions on the Code should be referred to your manager, your Local Human Resources and/or The Chief HR Officer, the Chief Legal Counsel or a member of the Executive Committee, in accordance with existing local guidelines and internal regulations.

NETCEED will cooperate fully with law enforcement or regulators if required.

People and Safety

NETCEED aims to always provide safe and healthy working conditions. This includes limiting harm to the environment, and the communities where we operate. Our activities are managed to protect the health, safety, and security of our people and communities in which we operate.

A. Individual Safety Responsibilities:

- Before beginning any work, take time to ensure you identify, assess, and take steps to control safety hazards associated with your work;
- Do not undertake work that you are not qualified to perform;
- Use the appropriate equipment, including personal protective equipment, for the task you are performing;
- Stop any work that appears to be unsafe and listen to others who raise concerns;
- Be sure that your performance is not impaired from lack of sleep or other distractions (under no circumstances should work be performed under the influence of alcohol, medications, or drugs); we have Zero Tolerance approach to drug/alcohol;
- Know the emergency procedures that apply to your workplace and be responsible for visitors or guests; and
- Report any accident, injury, unsafe condition, incident, or complaint immediately, in accordance with existing local guidelines and internal regulations.

B. Equal Opportunities

NETCEED values all Group Personnel for their unique skills, abilities, creativity, experience, and contributions that they bring to its business. Everyone directly contributes to our

success and our reputation.

We strive to treat everyone with fairness, respect and dignity and expect those we work with to act in a way that is consistent with our sense of fairness and equal opportunity. We have zero tolerance for any form of discrimination.

Decisions related to recruitment, development and promotion are based upon aptitude and ability only. Decisions must not be influenced by factors such as age, gender, sexual orientation, marital status, race, colour, ethnic origin, religion, or belief, disability, political views, or any other characteristic protected by local law or regulation.

We are committed to fostering a supportive work environment and will not tolerate harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse, in any form whether directed at Group Personnel, business partners, or anyone else; nor is there to be the threat of any such treatment.

If any Group Personnel believe that discrimination or harassment has occurred, they should report this to their manager, Local Human Resources and/or The Chief HR Officer, or other member of the Executive Committee in accordance with existing local guidelines and internal regulations.

C. Diversity, Equity, Inclusion and Belonging

NETCEED is committed to fostering, cultivating, and preserving a culture of diversity, equity, inclusion and belonging (“DEI&B”). Our commitment to DEI&B is applicable but not limited to our practices on recruitment and selection; compensation and benefits; professional development and training; promotions; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of diversity, equity, and inclusion.

All Group Personnel should work to promote the spirit of DEI&B amongst their peers and in their work. If any Group Personnel believe that discrimination has occurred, whether against us or someone else, they should report them to their manager, Local Human Resources and/or The Chief HR Officer, or other member of the Executive Committee in accordance with existing local guidelines and internal regulations.

D. Privacy of Personal Data

NETCEED respects the privacy of its Group Personnel and will only take an interest in what employees do outside of work if it affects the Group’s reputation or legitimate business interests. We only use personal data to the extent needed for Human Resources purposes and in any event in compliance with applicable laws. For more information about how NETCEED handles the personal data of its Group Personnel, please refer to the Employee Privacy Notice, which is available upon request.

Any Group Personnel with concerns regarding safety, treatment, or conditions of themselves, any other employee, or our customers should report them to their manager, Local

Human Resources and/or The Chief HR Officer, or other member of the Executive Committee.

Business Integrity & Legal Compliance

NETCEED is committed to complying with all applicable local, regional, national, and international legal and regulatory requirements, including, but not limited to, the Sapin II law, the UK Bribery Act, the U.S. Foreign Corrupt Practices Act (FCPA), the Israeli Penal Law, the Portuguese Criminal Code, the Penal Code of the Dominican Republic, all applicable U.S. Federal Civil Rights/EEO Laws and other related local laws.

Where differences exist between the standard of the law or regulations and requirements of the Code, the most restrictive standard shall be applied and mandatory local, regional, national and/or international legal and regulatory requirements shall prevail. Where laws conflict or you are unsure of the correct action to take, you must consult with your manager, the Local Human Resources and/or The Chief HR Officer, or another member of the Executive Committee.

Managers with responsibility for business activities within a country must ensure that NETCEED's business processes are in compliance with the local laws and regulations.

A. Anti-Bribery and Anti-Corruption

Bribery means promising, offering, or giving “anything of value” with the intent to improperly influence an act or decision of the recipient or obtain an improper advantage in order to obtain or retain business. Bribes can take many different forms, and there is no minimum value. In this context, “anything of value” should be broadly interpreted to include anything of monetary or non-monetary value, if the intent of the exchange is to corruptly influence the recipient or to retain an improper business advantage.

NETCEED strictly prohibits all forms of bribery, including commercial bribery in the private sector, and bribery of Government Officials.¹ The prohibition applies to any transaction, regardless of amount or kind, and regardless of whether it is reimbursed by the company or comes out of the Group Personnel's own pocket. This prohibition against offering, promising, paying, or accepting bribes also applies to third parties who provide services or act on the company's behalf, such as agents, consultants, and other business partners.

Your responsibilities include:

- Never offering, paying, making, seeking, or accepting a personal payment, gift, or favor in return for favorable treatment, to influence a business outcome, to obtain a decision in your favor, or to gain any business advantage;

¹ The term “Government Official” is defined broadly for the purposes of this Code to include all officers or employees of a government department, agency, or instrumentality; permitting or licensing agencies; customs officials; candidates for political office; and officials of public international organizations (e.g., the Red Cross). This term also includes officers or employees of government-owned or -controlled commercial enterprises such as state-owned or -controlled universities, airlines, oil companies, health care facilities, or other vendors. The term further includes family members and close associates of such individuals (e.g., it is not permissible to give a gift to the sibling, spouse, or child of a government employee if a gift to the individual would be prohibited under this Code).

- Ensuring people you work with understand that bribery, corruption, and influence peddling are strictly prohibited;
- Ensuring that accurate books and records are kept so that payments are honestly and accurately described, and company funds are not used for unlawful purposes;
- Knowing who you are doing business with by carrying out appropriate levels of due diligence and monitoring; and
- Reporting any suspicion of corruption within the company or on the part of any external party with whom we do business.

All Group Personnel should be familiar with the contents of the Code of Conduct and Anti-Corruption Policy and be aware that appropriate measures may be taken in case of violation of the Code of Conduct and the Anti-Corruption Policy.

B. Facilitation Payments

There are specific legal risks associated with providing, or being perceived as providing, a financial or other advantage to a Government Official. Historically, small bribes to Government Officials have been called “facilitation payments.”

NETCEED does not permit “facilitation payments” to be paid either directly or indirectly by those who work for the Group or act on its behalf, even if they are permitted by local law. Facilitation payments are payments made to Government Officials in exchange for expediting or ensuring the performance of a routine governmental action for which the Government Official will not be exercising his/her discretion. Facilitation payment requests typically arise in connection with issuing licenses and permits, processing paperwork, and obtaining similar services to which the company or employees are entitled as a matter of law. If you are asked to make such a payment, then you must politely refuse and should report it to your manager, the Local Human Resources and/or The Chief HR Officer, Chief Legal Counsel, or other member of the Executive Committee.

If you are ever in an exceptional situation where demands are being made for a bribe, facilitation payment, or anything else of value, and you genuinely feel that your health, safety, or security is being imminently threatened, then you can pay or provide the minimum amount possible to remove yourself safely from the situation and you should immediately report the facts to your manager, the Local Human Resources and/or The Chief HR Officer, Chief Legal Counsel, or other member of the Executive Committee.

C. Benefits to External Parties (Gifts, Meals, Entertainment, etc.)

From time to time, NETCEED may provide gifts, meals, entertainment, or travel support (collectively, “Hospitality”) to third parties. It is prohibited to provide Hospitality which improperly influences or appears to influence business decisions or subjects NETCEED to any obligation or expectation of reciprocity. The giving or offering of a gift of any size to a Government Official in order to influence official action or obtain an improper advantage is never permitted. On the other hand, providing a small, non-cash gift of nominal value is permissible if the gift is not designed to influence official action or to obtain an improper advantage.

Genuine Hospitality and promotional, or other business expenditure, which seeks to improve external relations, publicize our capabilities or activities, and establish cordial relations is recognized as an appropriate business practice. Reasonable and proportionate Hospitality intended for these purposes is not prohibited; however, all Hospitality must be provided in a manner consistent with the requirements of the Anti-Corruption Policy and applicable local law and customs.

Exercising poor judgement with respect to offering, giving, or accepting Hospitality could result in a breach of the law with serious consequences for individuals and NETCEED.

To avoid any appearance of impropriety, Group Personnel should:

- Always make clear that gifts, meals, Hospitality, entertainment, and travel support are never provided with the expectation of anything in return; any gifts, meals, Hospitality, entertainment, and travel support that are approved and provided in accordance with this Code must be accurately recorded;
- Never accept anything of value in exchange for referring a third party to any person, organization, or group unless it is otherwise permitted under this Code;
- Never give or receive extravagant gifts or entertainment – values should always be reasonable and modest in line with the applicable limits in the Anti-Corruption Policy;
- Such gifts should be given and received in a transparent manner appropriate to the business relationship; and
- Never solicit or accept gifts, entertainment, or other special favors from any organization, person, or group that does or is seeking to do business with the Company or if it coincides with any purchasing, sales, or other decisions, since they could appear to improperly influence such decisions.

In the event of a conflict between this Code and any applicable local laws or regulations, the more restrictive provisions apply and mandatory local, regional, national and/or international legal and regulatory requirements shall prevail. For example, if local law or a prospective recipient's employer imposes lower expenditure limits than are permitted under this Code and the Group's policies, Group Personnel must comply with the lower expenditure limits.

If you ever find yourself in a situation where clients are requesting or Group Personnel are offering extravagant or lavish gifts, hospitality services, or other business expenditure in contravention of this Code, you should report it to your manager, the Local Human Resources and/or The Chief HR Officer, Chief Legal Counsel, or other member of the Executive Committee.

D. Money Laundering Prevention

NETCEED is committed to preventing its operations from being used for money laundering and terrorist financing. Money laundering is the process by which parties conceal the existence, nature, ownership, or source of funds that derive from unlawful activities or that have been obtained through corrupt means. NETCEED Personnel should not engage in transactions that are unlawful, or involve property derived from illegal conduct, or that support crime or terrorism.

E. Sanctions & Export Controls

Sanctions are financial, trade, and travel-related restrictions targeting individuals, entities, and territories which are implemented for foreign policy purposes. Sanctions may be list-based, country-based, or target certain industry sectors.

All NETCEED Personnel are responsible for ensuring that our business activity is in compliance with all applicable national and international sanctions and export control laws, regulations, and rules, including the laws of the European Union, United States, United Kingdom, and any other jurisdiction to whose laws NETCEED is subject. This includes both direct and indirect business activity. In order to ensure compliance with sanctions and export controls, Group Personnel must carry out the appropriate sanctions and export controls procedures as set out in NETCEED's Sanctions & Export Controls Policy, including conducting screening and third party due diligence.

Avoiding conflicts of interest

A. Conflicts of Interest

NETCEED expects its Group Personnel to avoid situations that may involve a conflict between an individual's personal interests and the interests of NETCEED. As in all other facets of their duties, Group Personnel dealing with customers, suppliers, contractors, competitors, or any person doing or seeking to do business with the Group are to act in the best interest of NETCEED.

Examples of potential conflicts of interest include:

- **Financial interest:** As staff, you and your families (including spouse, children or spouse-equivalent with whom you are residing) own, control or direct a material financial interest in, including lending funds to, a supplier, contractor, competitor, or in any business enterprise which does or seeks to do business with the Group.
- **Outside directorships:** You serve as a director, officer, partner, consultant or any other role in unaffiliated profit-making organizations if that activity may impair your duty to act in the best interests of the Company. Holding directorships in unaffiliated entities requires the consent of the CEO.
- **Outside activities:** You or your family volunteer or are employed by any business enterprise of a competitor, customer, or supplier of goods, services or credit to the Company.
- **Personal relationships:** Arrangements or circumstances, including personal relationships, that may compromise your ability to act in the best interest of NETCEED. You may supervise directly or may be in a position to influence the career of someone with whom you have a personal relationship.
- **Special interest groups and political office:** You wish to seek election or appointment to a political office or become actively involved with a special interest group.

Any Group Personnel who consider that they may have a potential conflict of interest should make prompt and full disclosure in writing to their line manager (unless that manager is also involved in the conflict of interest, in which case it should be reported to a more senior

manager). Conflicts of interest, including mitigation plans, should be appropriately recorded.

Any Group Personnel who have knowledge of any violation of the policy shall report it to the Human Resources Department. All reports of incidents will be handled in a prompt, appropriate and confidential manner. The Group prohibits retaliation against any individual who reports or participates in an investigation of such reports.

B. Competition and Antitrust

NETCEED shall not engage in any anticompetitive conduct. Our Group Personnel must not engage in any form of exchange of information or agreement or understanding with competitors to fix prices, rig bids, allocate customers, and/or restrict supply. If your role involves dealings with competitors or is market facing, you must ensure that you are fully briefed and trained on competition law.

C. Donations and Contributions

From time to time, NETCEED may make charitable or social contributions (money, assets, materials, or services), and generally does not make political donations. Any such contribution by NETCEED or on the Group's behalf must be pre-approved in writing by your manager, or another member of the Executive Committee and made in a manner consistent with this Code and with the Anti-Corruption Policy.

Group Personnel who choose to become personally involved in political or social activities, must do so in their own time and without using any company resources or representing their views as those of NETCEED.

D. Business Partners

Our third-party suppliers and business partners are essential to our ability to do business. We expect them all to share our commitment to safety, ethics, and compliance. Importantly, NETCEED can be held liable not only for our own actions but also for the actions of third parties acting on our behalf, such as agents, advisors, contractors, consultants, or suppliers. Anti-bribery and anti-corruption laws prohibit the use of third parties, such as agents, acting on behalf of a company to facilitate bribery, whether or not the company had actual knowledge of the third parties' actions.

If you suspect any of NETCEED's third parties of making improper payments or engaging in other misconduct, you should immediately report this to your manager, the Chief Legal Counsel, or another member of the Executive Committee. NETCEED conducts risk-based, proportionate due diligence for third parties performing services on its behalf. Group Personnel responsible for hiring or engaging third party business partners must be familiar with and comply with the NETCEED Third Party Due Diligence Policy which contains details on appropriate due diligence measures tailored to the third party's risk profile.

Group Personnel who are directly responsible for the management of contracts with third parties or regularly engage with business partners must:

- Ensure that the requirements of our Code and other relevant standards are communicated, and contractual obligations are agreed where applicable.
- Ensure that appropriate due diligence activities are completed. This must include appropriate levels of financial and legal checks to prevent money laundering, corruption, fraud, and any other financial crime.
- Periodically review any changes to the third-party relationship (i.e., types of services provided) and the third party's circumstances to inform whether the risk rating of the third party has changed, and whether heightened due diligence is warranted.
- Actively monitor and manage all third parties you have engaged with to ensure their proper performance of contractual obligations where appropriate, and their adherence to this Code.
- Report any indications that a supplier or business partner is not complying with this Code, applicable laws, or contractual obligations.

Safeguarding Information and Assets

Intellectual, physical and financial corporate assets are valuable and must be managed and protected appropriately. Personal data and intellectual property must be safeguarded, and communications facilities must be used responsibly.

A. Protection of Assets

NETCEED owns a wide range of assets, including property, funds, plant, equipment, data, and intellectual property. All NETCEED Personnel have a general duty to use them properly, and some roles carry specific responsibilities for asset protection, which may include ensuring security, undertaking maintenance or otherwise preventing damage or loss.

Accurate financial and non-financial information records are essential to our business and to demonstrate our compliance with legal and regulatory obligations, as well as the expectations of our stakeholders.

We will maintain effective internal accounting policies, standards and procedures and will establish appropriate controls to ensure that all financial transactions are properly authorized, recorded and reported. All books, records and accounts must reflect all transactions in connection with our business accurately.

Information relating to NETCEED's operations must be kept secure, using systems established for that purpose. Information should only be disclosed or exchanged with authorized persons or entities, subject to the requirements of legislation. Information should also be managed and stored effectively, to safeguard its quality and reliability.

Where NETCEED holds personal information on its Personnel, this also must be safeguarded and kept confidential, in accordance with data protection legislation.

All NETCEED Personnel are responsible for protecting NETCEED's assets against unnecessary waste, loss, damage, misuse, theft, misappropriation or infringement, and for using all of our assets responsibly.

Protecting the security of our people and workplace is vital. NETCEED Personnel must understand and follow site and business security procedures and report any circumstances that appear to create a specific vulnerability or pose a threat to their own security, other people or our assets.

B. Data Protection

NETCEED takes privacy and data protection seriously. During our activities we collect, use, store, share and process personal data about our current, past and prospective employees, customers, suppliers and other third parties with whom we communicate. Personal data is subject to legal safeguards specified in applicable data protection legislation, including but not limited to the General Data Protection Regulation (EU) 2016/679 (“GDPR”).

The GDPR defines personal data as “any information relating to an identified or identifiable natural person.” All personal data must be kept and processed in accordance with GDPR and applicable local laws.

In general, personal data must:

- Be collected only for specified purposes that are necessary for our business and used only for those purposes;
- Not be disclosed to third parties except where allowed by law;
- Be kept secure using appropriate technical and organizational measures, including as necessary passwords, encryption, restricted digital or physical access, and other measures; and
- Not be kept for longer than necessary for the purpose for which it is collected.

All Group Personnel must comply with applicable data protection legislation when processing personal data. As part of your job, you may process personal data about other NETCEED Personnel (such as customers, suppliers and other third parties). Even if you do not have direct involvement with personal data as part of your job, there may be times when you are asked by others to supply or otherwise process personal data. At all times you should be mindful of your obligations with regards to data protection.

If you believe that personal data held by NETCEED has been lost, stolen, or disclosed to or accessed by an unauthorized person, please report it immediately to your IT Director, your Local Human Resources and/or The Chief HR Officer, Chief Legal Counsel, or another member of the Executive Committee.

C. Use of IT and Electronic Communications

NETCEED provides its staff with IT equipment and access to electronic communications systems and expects its staff to use these responsibly. Staff should take care of equipment provided to them and should also keep safe passwords and any other electronic security measures.

Although staff are permitted to make personal use of IT equipment and communications systems, this should be kept to a minimum and should not interfere with the fulfilment of duties. Staff should not generate large volumes of network traffic through personal use.

Use of NETCEED systems for accessing pornography and other inappropriate material or activities will be treated as misconduct. Use of NETCEED's communications systems and social media for bullying or other forms of harassment will also be treated as misconduct.

NETCEED reserves the right to monitor and make use of the use of electronic communications that you generate using NETCEED systems and NETCEED IT equipment to ensure that NETCEED's rules are being complied with, for legitimate business purposes and to take action in the event of misuse.

D. External Communications

Only authorized Group spokespersons are permitted to make any public communication regarding NETCEED or its business to the media (traditional and social/online) or analysts. If you are approached or contacted with a request for information, then you should refer it to your Marketing Director, or another member of the Executive Committee.

All NETCEED Personnel who use or engage in conversations on social media must take care that they do not speak on behalf of NETCEED unless otherwise authorized to do so. You may not divulge or discuss confidential information or other information relating to the NETCEED's operations which could lead to a violation of confidentiality agreements or contractual obligations.

E. Record-Keeping and Transparency

Accurate record-keeping and reporting help us meet our legal and regulatory requirements. Maintaining financial integrity also reflects positively on our reputation and credibility. Each of us – at every level of our company – has a responsibility for ensuring the accuracy of all company business and financial records.

Any failure to record transactions accurately or falsifying or creating misleading information or influencing others to do so, could constitute fraud and result in appropriate measures for Group Personnel or the company.

Group Personnel must:

- Record all transactions accurately, completely, and promptly;
- Maintain accurate records related to training, certifications, and any disclosed conflicts of interest;
- Only perform transactions, such as buying, selling, or transferring goods/assets, for which they are authorized;
- Ensure transactions they approve are legitimate and based on valid documentation;
- Notify NETCEED's Group CFO, or another member of the Executive Committee of any potential fraud, other misrepresentation of accounting or other information, or if a 'facilitation payment' has been paid to avoid physical danger or due to an error in judgement;
- Where instructed in the context of a legal hold, retain records in accordance with the guidelines in the notification; and

- Retain records that may be relevant to any ongoing audit, litigation, or regulatory investigation.

Environmental, Social and Governance (ESG)

At NETCEED, we strongly believe that it is in the mutual interest of both NETCEED and our business partners to create a positive impact on our planet and communities.

NETCEED strives to act responsibly towards the environment and the people taking part in the development and delivery of our solutions and services. We recognize that our operations have an impact on the environment and our society, and we are committed to minimizing the negative impact and promoting positive impacts, whilst delivering solutions to our customers worldwide.

NETCEED expects all Group Personnel to work alongside NETCEED in these endeavors and abide by NETCEED's Environmental, Social and Governance ("ESG") Policy. The ESG Policy addresses NETCEED's ESG priorities and associated Group Personnel expectations related to:

- Climate and energy;
- Resource use and Circular economy;
- DEI&B;
- Human rights and labor standards;
- Health and safety;
- Business ethics and conduct;
- Cybersecurity;
- Sustainable supply chain; and
- Product quality and safety.

All Group Personnel should be familiar with the contents of the ESG Policy and consider how it may impact their role at NETCEED.

For applicable Group Personnel, this will include taking sustainability and other ESG-related factors into engagement decisions with third parties.

Prior to engaging a third party, applicable Group Personnel have an obligation to ensure that such third party is in alignment with NETCEED's ESG Policy and agree to abide by the Supplier Code of Conduct. If a concern or violation of NETCEED expectations or policies is identified through initial due diligence or ongoing monitoring thereof, this should be taken into account in the third party's risk profile and determination as to whether to continue the business relationship with the applicable third party.

If you ever find yourself in a situation where you are unsure how to act in accordance with this Code or the ESG Policy or have ideas on how to further NETCEED's ESG priorities, you should contact the Group Sustainability Lead or another member of the Executive Committee.

Monitoring and Reporting

Every manager is responsible for monitoring compliance with the Code of Conduct and

other Group standards and procedures in order to provide assurance to senior management and the Board that effective controls are in place, expected results are being achieved, and to report potential violations of the Code and results of subsequent investigations to the relevant Local Human Resources and/or The Chief HR Officer and the Executive Committee.

External, independent reviews will be carried out to periodically provide additional assurance.

A. Reporting of Violations - Speak Up

All NETCEED Personnel are responsible for reporting any actual or potential violations of the Code of Conduct. If in doubt, Group Personnel should report their concerns to their direct supervisor, as applicable, unless they have reason to believe that the individual may be complicit in the violation, in which case they should report the issue to their functional manager, Local Human Resources and/or The Chief HR Officer, Chief Legal Counsel, or another member of the Executive Committee. In order to be protected, Group Personnel are strongly encouraged to speak up internally first, before reporting to any external authorities.

All reporting of misconduct or suspected misconduct is confidential and will be carefully studied.

This means your report will only be shared with a limited number of people, all of whom will be under an obligation to keep the report confidential. It is not possible to report through an anonymous helpline.

The Group will take all necessary steps to ensure the confidentiality of the investigation to the extent possible to conduct a thorough, objective fact-finding.

The Group is committed to protect the privacy of Group Personnel.

We will do everything reasonable to safeguard personal data from unauthorized access and processing. You can send an email to privacy@netceed.com in order to gain access to your personal data and, as the case may be, to request that this data be rectified, completed, updated, blocked, or deleted.

B. Non-Retaliation Policy

Retaliation against Group Personnel who bring concerns forward in good faith is prohibited. Any negative action taken against an individual who has raised concerns regarding a violation or potential violation of the Code of Conduct, other Group policies, or applicable law, is unacceptable, and itself constitutes a violation of the Code. NETCEED will take disciplinary action against individuals deemed to have instigated any form of retaliation.

C. Dealing with Violations of the Code

In the event that violations of this Code are suspected or proven, action will be taken. If there is reason to suspect non-compliance, an investigation will be undertaken to determine if a violation has occurred. In the event that a violation has occurred, action will be taken to address

any resultant harm, fulfil any obligations to report to regulatory agencies and to identify the root cause and implement measures to prevent further violations.

Please bear in mind that some violations may be criminal in nature and punishable by the law. Violations can jeopardize our relationships with our customers and suppliers and could result in loss of the privilege to do business in the countries where we operate. If you authorize, direct, cover up or in any way participate in any such violations, you will be subject to appropriate disciplinary action, and civil and/or criminal liability. Furthermore, NETCEED may, as appropriate, implement system-wide changes and/or notify the relevant governmental office or agency.

Approved by Board of Directors

Date 11/07/2024

About the policy

Document name	Netceed Code of Conduct
Document version	2
Start date valid	July 2026
Date for next review	July 2027

APPENDIX A

CODE OF CONDUCT CERTIFICATION

This is to acknowledge that I have received, read, and fully understood the Group's Code of Conduct (the "Code"). I agree to comply with all the rules contained therein. I will participate in NETCEED's Code of Conduct training.

Signature: _____

Name (print): _____

Company: _____

Department: _____

Date: _____

Delivery Instructions

- All Group Personnel should complete this form and deliver it to Human Resources. Human Resources is thereafter responsible for delivering the completed forms to the Chief Legal Counsel.
- New employees should complete this form immediately upon hiring and deliver to Human Resources, who will submit the completed forms to the Chief Legal Counsel.