WIRELESS LOGIC GROUP

Code of Conduct & Business Ethics

Our standards for partners, suppliers, and employees of the Wireless Logic Group

Our Code of Conduct sets out what we value as a company.

These principles define who we are and how we work. It is designed to clearly set out the minimum standards of behaviour we expect from ourselves and those with whom we work with.

A message from our CEO

Our purpose of 'accelerating the pace of positive environmental, social and economic change across the world', along with our core values underpin everything that we do and what we believe in. Maintaining high standards and ensuring that our team, customers, partners and suppliers understand and abide by our values is extremely important.

Our values create a strong, fair and responsible culture that makes Wireless Logic the inspiring, challenging and fun place to work. Our working environment is driven by the principles of honesty, mutual trust, fairness, respect and fun. We invest in people and teams in order to build relevant skills, knowledge, experience and create a great work environment.

I am proud that we operate a zero-tolerance policy for any form of discrimination, bullying or harassment and I encourage you to challenge any use of unethical, dishonest or questionable behaviour across our organisation.

Freedom of expression and honest communication are extremely important to this code. If you ever have any questions about the right thing to do, or feel that our Code of Conduct is being infringed upon, please be sure to speak up.

It is absolutely critical for us all to adhere to the highest ethical standards. I'd like to personally thank all of our team, customers, partners and suppliers for helping us uphold our values.

Oliver

Oliver Tucker
Founder and CEO

We are customer obsessed

We are IoT pioneers

We move fast

We are determined to deliver

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Using our
Code of Conduct

The Code of Conduct sets out the policies and procedures that the Wireless Logic Group adhere to.

Who does this Code apply to?

Our Code of Conduct applies to every single person working for and with the Wireless Logic Group.

It is essential that those whom we work with hold similar values to us, act responsibly and operate to the same high ethical standard as those we have adopted.

We expect our suppliers, partners and employees to meet all of the requirements set out within this Code of Conduct and to reflect these principles within their own supply chain.

We require commitment to our code of conduct from all our suppliers and partners as part of our supplier onboarding process.

This Code may be updated or varied from time to time to ensure we continue to act to a high ethical standard and comply with all relevant laws.

Raising Code-related questions or concerns

If you need additional help interpreting this Code or additional guidance about conducting business activities in compliance with the law please speak to *the legal department*.

Speak up

In order to fulfil our responsibilities under the Code and maintain and enhance our culture and reputation we rely on our suppliers, partners and employees to help us uphold the highest ethical standards.

We therefore encourage anyone to come forward and speak up about disrespectful, inappropriate, fraudulent, unethical or illegal behaviour or any concerns about compliance with the Code.

Reports of non-compliance with the Code may be made anonymously but should provide as many details as possible. Once a report is made we endeavour to handle any concerns raised in the most appropriate way and always confidentially, with sensitivity and urgency.

We do not tolerate retaliation against anyone who raises a concern in good faith under this Code or related policies or assists with an investigation. Anyone who engages in retaliation will face disciplinary action. Retaliation means any kind of unfair treatment, whether subtle or overt. There are serious consequences for retaliation, up to and including termination.

Any 'Speak up' concerns can be raised directly with Wireless Logic by contacting our independent third party, Safecall.

You can find the local numbers for contacting Safecall at the below link:

Contact Safecall

Legal Compliance

Wireless Logic expects anyone working for us to comply with the laws and regulations of the applicable legal systems.

Anti-Bribery and Corruption

Wireless Logic will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf.

The company is committed to implementing effective measures to prevent, monitor and eliminate bribery. We take our legal responsibilities very seriously and expect all individuals working within the Wireless Logic Group to do the same.

Anti-Money Laundering

Wireless Logic has zero tolerance for financial crime which includes money laundering and terrorist financing.

Any red flags identified are escalated for further investigation and any suspicious activity is reported where required.

Competing fairly

Wireless Logic comply with all relevant competition laws and does not collaborate with competitors by sharing or misusing confidential information or making agreements about the price of products or services.

We do not engage in insider trading or tipping others with respect to inside information. We expect our suppliers and partners to follow the same principles.

Data Protection

Wireless Logic comply with all relevant data privacy laws.

Whenever we process personal data, we will process it in accordance with our Data Protection Policy. We only process personal data if we have a lawful basis for doing so. This applies to all data processed by us in relation to our own people and our clients. We expect our suppliers and partners to follow the same principles.

A full copy of our Privacy Policy is available on our website.

View our Privacy Policy

Export Control and Customs

As an international company, we comply with all applicable trade control laws.

All of our people, especially those who are involved with import, export and re-import of products must be aware of the necessity for import and export licences and compliance with customs.

Legal Compliance *continued...*

Avoiding Conflicts of Interest

We ensure our personal interests and relationships don't create conflicts for Wireless Logic.

This means that we do not use Wireless Logic's property or information, or our position, for our own personal gain (or that of family members or close friends) and we do not take opportunities for ourselves (or family members or close friends) that we discover through the use of Wireless Logic's property, information or otherwise through our position at Wireless Logic.

Wireless Logic understands that personal conflicts occasionally arise in the ordinary course of business. When faced with a personal conflict of interest, we ask our suppliers, partners and employees to tell us about it as soon as they can in order to put in place the proper protections to avoid such conflict.

Keeping Records

Our suppliers must create accurate records.

All records made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records should be retained for the requisite period of time in accordance with applicable laws.

Wireless Logic may, upon reasonable notice, request copies of suppliers records in order to perform audits or verify compliance with this Code.

Preventing Facilitation of Tax Evasion

It is our policy to conduct all of our business in an honest and ethical manner.

We have a zero-tolerance approach to all forms of tax evasion, whether under UK law or the law of any foreign country. We are committed to implementing and enforcing effective systems to counter tax evasion facilitation. We expect our suppliers to comply with all applicable laws, regulations, codes and sanctions relating to the prevention of tax evasion facilitation including the Criminal Finances Act 2017.

Human Rights & Labour Practices

Equality and diversity

In accordance with our Equal Opportunity Policy we strictly prohibit unlawful discrimination or harassment on the basis of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership, or any other characteristics protected by law. Discrimination, harassment and bullying are prohibited in any form – verbal, physical, or visual.

Health and Safety

We are committed to ensuring that Wireless Logic operates a safe environment in which to work. Therefore, we have a Health and Safety policy in place to:

- prevent accidents and cases of work related ill health
- manage health and safety risks in our workplace
- provide clear instructions and information and adequate training to ensure employees are competent to do their work
- consult with employees on matters affecting their health and safety
- provide and maintain safe workstation equipment
- implement emergency procedures, including evacuation in case of fire or other significant incident.

We expect everyone to comply with our health and safety policy and act in a safe and responsible way at all times.

Modern Slavery and Child Labour

Wireless Logic Group strictly prohibits the use of modern slavery and human trafficking throughout the organisation and any acquired businesses.

We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery and human trafficking are not taking place anywhere within our organisation.

We expect suppliers to ensure modern slavery policies are communicated to workers in its supply chain and consider this in any procurement process.

Wireless Logic ensures that workers are of legal working age and are not required to hand over passports, ID cards or work permits as a condition of employment and that they are free to leave their employment on giving reasonable notice. We expect every party who we have dealings with to adhere to the principles of relevant local legislation.

A full copy of our Anti-Slavery and Human Trafficking statement can be found on our website.

View statement

**Human Rights &
Labour Practices** *continued...*

IR35

We consider that the Wireless Logic services provided to our customers fall outside the scope of the IR35 legislation. We have a statement explaining the rationale behind this consideration which can be supplied on request.

Working Hours, Wages & Benefits for Employees

Wireless Logic does, and expects every party who we have dealings with to adhere to the following principles:

- Recognise the legal rights of workers to form or join existing trade unions
- Adhere to all applicable working hours regulations globally.
- Pay fair wages for labour and adhere to all applicable wage and compensation laws globally and any minimum wage requirements.

Drug and alcohol policy

Our position on substance abuse is simple:

It is incompatible with the health and safety of our employees and we don't permit it. Illegal drugs in our offices or at sponsored events are strictly prohibited.

Speak Up

As referred to on page 5, we:

Provide access to a protected mechanism for their employees to report possible violations of the principles of this Code of Conduct.

Quality & Technology Protections

Quality policy

Wireless Logic recognises the importance of achieving good standards of quality management and quality control and the impact this has on the effectiveness of the business. We also recognise the need to continually strive for improvements and therefore provide a framework for setting and reviewing objectives and measurable targets. This is done by implanting a Quality Management System (QMS) that is maintained in accordance with ISO 9001:2015. The QMS is routinely audited to ensure continuous improvement and refinement.

Our current ISO accreditations are shown on page 17.

Incident management process

We utilise ISO-approved best practice risk management methodology for our BCMS, ISMS, and QMS. The Head of Information Security & Compliance is responsible for the information security management within Wireless Logic.

ISO 27001

Wireless Logic is accredited to the ISO 27001:2013 standard and are in the process of renewing its Cyber Essentials certification.

Business Continuity plan

Our Business Continuity Management System (BCMS) is certified to the ISO 22301:2019 standard.

Our Business Continuity Plan focuses on prioritised key processes and systems which have been identified through risk assessment and business impact analysis activities across the business and are tested regularly to enable continuous improvement and refinement. The planning is based on worse case scenarios such as prolonged lack of access to our headquarters as well as data centre disaster scenarios affecting our primary customer services.

We continually test throughout the year (including data centre failover capability and our ability to run all business functions from a remote location).

Sustainability

As a leading global managed IoT connectivity provider, we passionately believe that Wireless Logic has an important role to play in accelerating the rate of positive environmental, social and economic change across the world.

Positive change through the IoT

We are connecting millions of IoT devices that are changing the way the world works for the better. The integration of smart, connected products, with sensors being built into everything from consumables, wearables, buildings and transportation, is helping to accelerate the pace of positive environmental, social and economic change across the globe.

We are proud to be at the forefront of this revolution – helping our customers securely connect applications that transform environments, societies and economies.

Investing in STEM talent

Investing in STEM talent has been a cornerstone of Wireless Logic's success since its inception. As a leading UK based technology business, we believe that these are increasingly critical skills for the global economy and that we have an important role to play in encouraging young people to follow STEM careers.

We are incredibly proud that the vast majority of our graduates and apprentices stay with the business and contribute significantly to our achievements.

In addition to our graduate scheme, we offer apprenticeship opportunities and student placements to help build technology and engineering workplace skills. Our investments in ongoing professional development for our employees, from functional skills to management and leadership training, has developed a highly skilled team that delivers for both our customers and our shareholders.

We are an equal rights employer and believe in the power of diversity in business.

Supporting local communities

Across the Wireless Logic group, we believe in giving back to our local communities. Our business and people across the globe support local charitable and social causes that help people with a wide variety of needs and challenges.

Activities ranges from raising money through MacMillan coffee mornings to volunteering in Germany to help those affected by flooding and donating funds to local food banks in the UK supporting those living in poverty.

Sustainability *continued...*

Protecting the Environment

We have committed to reduce our carbon emissions of our business and our supply chain to mitigate the impact of climate change as we are committed to protecting the environment. Our efforts to minimise negative environmental impacts include improving our energy efficiency, decreasing our water consumption and reducing our waste.

We comply with relevant national and international legislation and standards in the countries in which we operate and expect our suppliers to do the same. We support the United Nations' 17 Sustainable Development Goals and aim to improve our business operations to help achieve a better and more sustainable future for everyone.

Net Zero

Wireless Logic's objective is to demonstrate we are net zero by 2025. Our approach is to commit to complying to ISO 14001 and 50001 standards and to seek formal accreditation to both standards during 2022.

Responsible Practices

Responsible Minerals Sourcing

We adhere to a responsible mineral sourcing practice by procuring raw minerals in a way that respects human rights, protects human and environmental health, and combats forced labour, child labour, and human trafficking and slavery. Our suppliers are expected to take reasonable steps to avoid the use of raw materials which originate from high-risk areas potentially contributing to human rights abuses, corruption or similar negative effects.

Suppliers must comply with applicable laws and regulations regarding sourcing of 'conflict-minerals' such as, tin, tungsten, tantalum and gold. Therefore, our suppliers should establish a responsible purchasing & sourcing policy and review their supply chains on a regular basis to ensure that there is no risk of conflict minerals being embedded in their products.

Sanctions

Wireless Logic complies with all relevant global sanctions and does not trade with any company that receives investment directly or indirectly related to a person or entity associated with, controlled by, or subject to, influence by the Russian or Belarusian government or any other sanctioned individual or entity. We ensure during our onboarding process that our suppliers and partners similarly comply.

Supplier & partner specific obligations

Wireless Logic's suppliers and partners must commit to comply with this Code and ensure they do not take any actions that would encourage Wireless Logic or any of their employees to act in any way that contradicts this Code.

Suppliers and partners must, in addition to complying with the standards set out in this Code, comply with all applicable laws and regulations.

It is therefore important to us that our suppliers and partners take active steps to promote and implement compliance with our Code of Conduct or their own equivalent code of conduct in their supply chain.

Wireless Logic Supplier's and Partner's Commitment

Wireless Logic requires its Suppliers and Partners to commit that:

> *they will comply with the requirements in this Code.*

> *they have appropriate systems in place to ensure continuous compliance and to demonstrate such compliance.*

> *any breach of this Code will allow Wireless Logic to terminate its relationship with them with immediate effect.*

Company Details
& other information

General Information

Company Name	*Wireless Logic Limited*
Company Registered Number	*3880663*
VAT Registration Number	*GB 766073905*
Company Registered Address	*Horizon, Honey Lane, Hurley, Berkshire, SL6 6RJ*
Telephone Number	*0330 056 3300*
Website	*www.wirelesslogic.com*
Business Structure	*Limited Company*
Date of Incorporation	*19/11/1999*
Email address	*hello@wirelesslogic.com*
Remittance Email	*remittances@wirelesslogic.com*

Important Emails

Orders Email	*orders@wirelesslogic.com*
Credit Control	*creditcontrol@wirelesslogic.com*
Information Security	*Infosec@wirelesslogic.com*
GDPR/Data Protection Officer	*gdpr@wirelesslogic.com*

Wireless Logic Group Insurance

Wireless Logic maintains required insurance at a group level with additional local policies where required at subsidiary level.

Details of our current insurance certificate can be obtained from *SalesAdmin@wirelesslogic.com*.

ISO Accreditation Tables

Wireless Logic

Standard	Auditor	Certificate number	Valid from	Valid to
ISO 9001:2015	BSI	FS 630147	14th July 2021	13th July 2024
ISO 27001:2013	Alcumus ISOQAR	19387-ISMS-001	15th June 2020	14th June 2023
ISO 22301:2018	Alcumus ISOQAR	19387-ISMS-001	18th June 2021	17th June 2024
ISO 14001:2015	Alcumus ISOQAR		In plan for 2022	
ISO 50001:2018	Alcumus ISOQAR		In plan for 2022	

Arkessa

Standard	Auditor	Certificate number	Valid from	Valid to
ISO 9001:2015	Alcumus ISOQAR	14424-QMS-001	3rd December 2020	3rd December 2023
ISO 27001:2013	Alcumus ISOQAR	14424-ISN-001	15th June 2020	14th June 2023
ISO 22301:2018	Alcumus ISOQAR	14424-BCI-001	3rd March 2020	3rd March 2023
ISO 14001:2015	Alcumus ISOQAR		To become part of the WL UK System in 2022	
ISO 50001:2018	Alcumus ISOQAR		As above	