

# COMPANY POLICY

## CODE OF CONDUCT & ETHICS

### INTRODUCTION

Acting with Integrity is about doing the right thing because it is the right thing to do. Integrity within Instalcom means that every employee takes ownership and personal responsibility for doing the right thing by acting in line with the ethical standards of the company. The purpose of our standards is to preserve the company's integrity and protect our reputation.

### HEALTH, SAFETY AND THE ENVIRONMENT

We are committed to the health, safety and wellbeing of our employees and our contractors and we care for the environment and the communities we serve. Safety is Instalcom's fundamental priority and it comes first in all our operations. A healthy and safe workplace is everybody's responsibility. Most accidents and incidents, injuries and work-related illnesses are preventable, and each person must care for others and themselves.

By demonstrating commitment to our own health and wellbeing and our environment we set a positive example for those around us. We will always be responsible and strive to find ways to improve the safety of operations wherever we work and reduce our environmental impact.

Environmental considerations are part of our daily operations and we work proactively to reduce our impact. We take a precautionary approach and always include environmental aspects when we make decisions – both big and small. Compromising safety is never acceptable and no employee should feel pressure to forgo safety or the environment in order to reach business targets. Any breaches of relevant rules and/or protocols should be reported immediately.

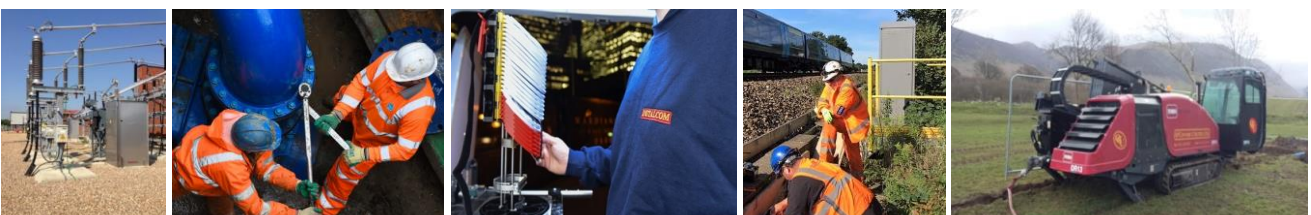
The wellbeing of those who work on behalf of Instalcom is as important as the physical side. We must all be mindful of our own and our colleague's mental health and raise awareness of this key issue.

### PROFESSIONALISM

We are accountable for the actions and decisions we take and are always committed to complete our work to the best of our ability. However, as ambassadors for the company we behave correctly and honestly and avoid situations that may compromise (or may be seen to compromise) our decisions. We act in the best interest of Instalcom, but never seeking to gain unfair advantages nor entering into situations that create potential or perceived conflicts of interest.

We do not tolerate bribery nor any form of corruption. We reward based on merit and do not give personal connections, such as family or friends, any unfair advantages. Our procurement processes are fair, transparent and responsible and we only work with those who share our commitment to carrying out business in an appropriate and ethical manner.

We do not enter into deals that involve unusual payment methods or abnormal terms and conditions. We do not offer or accept gifts and invitations that could be perceived as an attempt to influence business decisions in an unethical manner. Anyone acting in the name of Instalcom may not seek to accept any rewards, either for themselves or anyone else, in return for preferential treatment when procuring goods and services, sourcing fuels or in any other business dealings.



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### OPENESS AND HONESTY

We are a business powered by people and partnership and we know that being transparent in words and actions commands confidence and respect. We are generous with what we know, openly share knowledge, seeking new perspectives and engaging with others to enable innovation and speed up development. When we communicate we are proactive, transparent, straight forward and relevant.

We respect open markets and fair competition, never abuse our market position and always act according to high business standards. We also keep accurate and transparent financial records and provide all information required by law.

Being open does not mean that we share sensitive information with competitors, suppliers or any other outsiders. We do not use our inside knowledge for personal gain or divulge non-public information obtained at work to friends, family or unauthorised colleagues.

Information is one of our most valuable and sensitive assets. We respect and protect the confidential information and personal data with which we are entrusted by customers, employees and third parties in the course of our business. We always take appropriate measures to prevent accidental disclosure. We make sure to follow all legal, contractual and business requirements when handling personal data and confidential information.


### RESPECT

We are dedicated to creating a collaborative working environment built on respect, fairness and integrity. We promote diversity and inclusion and treat everyone with dignity and common courtesy. We must refrain from all forms of unacceptable behaviour such as bullying, discrimination, sexual or non-sexual harassment, racism, aggression, violence and verbal attacks.

### MORAL COURAGE

Speaking up is not only encouraged, it is expected. It is every employees' responsibility to report anything that does not seem appropriate or safe. Examples include; observed or suspected bullying or harassment, when someone's health or safety is in danger, the possible infringing of a person's human rights, potential damage to people, the environment or the business. It is vitally important that any suspected criminal offences (no matter how small) are reported. These may be instances where Instalcom or any of its employees are not obeying the law or covering up wrongdoing.

This policy will be reviewed at a frequency of no less than annually.



Signed.....Date: 03/01/22

**Vince Bowler - Managing Director**

