

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.

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.

Nothing in this Code, or in any confidentiality obligation, is intended to prevent an employee from making a legally protected disclosure, including disclosures relating to discrimination, harassment or sexual harassment, or from cooperating with any regulatory or legal authority.

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, 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.

Any alleged breach of this Code of Business Conduct may be addressed under the Company's Disciplinary Procedure. The Company's disciplinary and grievance procedures are designed to ensure fairness and consistency and are aligned with the ACAS Code of Practice on Disciplinary and Grievance Procedures.

Where formal action is required, employees will be informed of the concerns, given the opportunity to respond, and have the right to be accompanied and to appeal in accordance with Company procedures.

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 your 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?

Employees are encouraged to raise concerns about suspected wrongdoing, unsafe practices, unethical behaviour or breaches of this Code as early as possible. Concerns may be raised with:

- Your Manager
- A member of the HR team
- A Company Director

Where a concern relates to serious wrongdoing or a matter in the public interest, it may constitute whistleblowing. Employees who make a qualifying disclosure in good faith will be protected from detriment or dismissal in accordance with whistleblowing legislation.

The Company will not tolerate retaliation against any individual who raises a genuine concern. Confidentiality will be respected wherever possible. Further guidance is available in the Company's Whistleblowing Policy.

What happens after you report your concerns?

All concerns that are made are sent to one of the Senior Management Team or 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
- Bribes being offered or accepted
- Discrimination, victimisation or exclusion
- Harassment, including sexual harassment, unwanted conduct, or behaviour that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment

- Exploitation
- Alcohol or drug abuse
- Any violations of company policies or procedure

WCCTV is committed to providing a working environment free from harassment and bullying. The Company will take all reasonable steps to prevent harassment, including sexual harassment, through clear standards of behaviour, training, effective reporting routes and prompt action where concerns are raised.

Third Party Harassment

Harassment by third parties, including customers, suppliers, contractors or visitors, will not be tolerated. Employees who experience or witness such behaviour are encouraged to report it in accordance with this Code. The Company will take appropriate steps to protect employees and address any concerns raised.

This Code of Business Conduct and Ethics should be read alongside the Company's HR policies, including the Employee Handbook, Disciplinary Procedure, Grievance Procedure and Whistleblowing Policy.

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



David Gilbertson – Chief Executive Officer

Date: 18th March 2026