30 October 2026

Doc No: 8.1.25

Ref: BMS-08-POL-0060

Code of Conduct

HR Department

NETCALL

Contents

1 Our purpose 2

2 Who this Code of Conduct applies to 2

3 Our Commitments 2

3.1 Behaviour 2

3.2 Values 3

4 Human rights 3

5 Diversity, equity and inclusion 3

6 Anti-Harassment 4

7 Business Ethics 4

7.1 Business Ethics in Partnerships 5

8 Anti-slavery 6

9 Anti-bribery and corruption 6

10 Environment 7

11 Health and safety 7

12 Further information 7

13 Enforcement 8

14 Review period 8

© 2026, Netcall Group | Public.

1 Our purpose

The Netcall Group helps organisations improve customer engagement and deliver faster digital transformation. We do our work professionally and responsibly, respecting customers, suppliers, partners and colleagues.

2 Who this Code of Conduct applies to

In this Code 'we', 'us', 'our', 'Group' and 'Netcall' refers to all companies within the Netcall group of companies and "Board" means the board of directors of Netcall plc from time to time.

This Code applies to all Netcall employees, Board members, volunteers, agency workers, contractors, casual workers, consultants, partners and other service providers acting on behalf of Netcall. It applies during employment and at work-related functions, including those that take place outside of normal working hours.

This Code is non-contractual. The Group retains discretion to amend, update or withdraw the Code at any time.

3 Our Commitments

We aim to act with integrity in all business dealings and foster a culture built on respect, inclusion and collaboration. We seek to build trust through transparent and accountable practices.

We support wellbeing, fairness and opportunities for professional growth, in line with applicable law and legitimate business needs.

3.1 Behaviour

We encourage behaviour that:

- Demonstrates respect for diverse perspectives and experiences.
- Promotes open communication, constructive feedback and active listening.
- Reflects professionalism, courtesy, and empathy.
- Supports teamwork, shared success, and continuous improvement.
- Upholds confidentiality and discretion where appropriate.

We discourage behaviour that:

- Undermines others through disrespect, exclusion, or harassment.
- Breaches trust through dishonesty or unethical conduct.
- Creates conflict through gossip, manipulation, or divisiveness.

© 2026, Netcall Group | Public.

3.2 Values

Our core values guide how we work:

- **Customer Focus:** Delivering high-quality customer service is at the heart of what we do.
- **Innovation:** Embracing change, fostering creativity and seeking better ways of doing things
- **Integrity:** Acting ethically and doing what's right, even in challenging situations.
- **Team Work:** Working together to achieve shared goals.

4 Human rights

Netcall respects and promotes human rights. We aim to create an environment based on equality, dignity, fairness and respect, free from harassment and unlawful discrimination. We recognise our responsibility to be aware of human rights issues and to foster a culture that supports these principles through this Code and through our everyday behaviours and actions. This commitment is applied in accordance with applicable law and proportional to risk in our operations and supply chains.

5 Diversity, equity and inclusion

Netcall values diversity, equality, and inclusion. We will seek to prevent unlawful discrimination in employment and in our interactions with third parties.

Netcall is committed to treating all employees equally regardless of their age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race, religion or belief, sex or sexual orientation (the 'protected characteristics' under the Equality Act 2010 as amended).

At Netcall we value our employees and potential employees, the experience and perspectives they bring, and their skills and qualifications. We will take reasonable and lawful steps to prevent discrimination in all aspects of employment including recruitment, promotion, performance reviews, training and development, pay, flexible working, leave and benefits, disciplinary and grievance procedures, and decisions relating to termination of employment.

We aim to ensure that all recruitment, promotion, and other selection exercises, including redundancy selection, are based on merit and objective criteria, and that reasonable steps are taken to prevent unlawful discrimination.

We periodically review workforce composition and may take positive action to improve representation, where lawful and practicable.

We will not ask about an applicant's health or disability before making a job offer, except in the limited circumstances allowed by law. For example, to check that the applicant can perform an essential part of the role (taking any reasonable adjustments into account), or identifying adjustments needed during the recruitment process. Where necessary, job offers may be made conditional on a satisfactory medical check.

© 2026, Netcall Group | Public.

Employees are expected to assist Netcall in meeting its commitment to provide a fair working environment and equal opportunity for all. We will provide necessary training and seek to ensure appropriate procedures are in place for any complaints or grievances that occur.

6 Anti-Harassment

Netcall is committed to providing a working environment in which everyone is treated with dignity and respect. Harassment, sexual harassment, victimisation and other inappropriate behaviour have no place at Netcall and will not be tolerated.

This applies to behaviour involving our employees and workers and to interactions with third parties, including customers, clients, suppliers, partners, contractors, consultants, visitors and members of the public. It applies in person and online, in the workplace and in connection with work, including meetings, conferences, business travel, customer or supplier premises and work-related events.

Sexual harassment is unwanted conduct of a sexual nature that has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Netcall will take all reasonable steps to prevent sexual harassment and to protect our people from harassment by third parties. This includes identifying and managing relevant risks, providing appropriate information and training, and responding to concerns raised.

Everyone working for or with Netcall is expected to behave professionally and respectfully and must not engage in harassment or victimisation.

Anyone who experiences or witnesses inappropriate or harassing behaviour is encouraged to raise it promptly with their manager or HR. Concerns will be taken seriously, handled sensitively and, where appropriate, investigated.

Where a concern involves a third party, Netcall will consider the circumstances and take appropriate and proportionate action, which may include restricting contact or access, raising the matter with the third party or their organisation, or reviewing the relevant commercial relationship.

No one will be treated adversely for raising a concern in good faith, supporting someone else in raising a concern or participating in an investigation.

7 Business Ethics

We are committed to conducting our business with integrity, transparency, and accountability. Everyone acting on behalf of Netcall is expected to uphold the following principles:

- **Integrity and Honesty:** Act honestly and with integrity in all dealings, both internally and externally. Misrepresentation, fraud, or unethical behaviour will not be tolerated.
- **Compliance with Laws and Regulations:** Comply with all applicable laws, regulations, and industry standards in the UK and in any other jurisdictions where we operate.

© 2026, Netcall Group | Public.

- **Data Protection and Confidentiality**: Handle personal data responsibly, comply with applicable data protection laws (including UK GDPR), and safeguard confidential information shared during the course of business.
- **Fair Competition**: Support fair and open competition and do not engage in anti-competitive practices, including collusion, price-fixing, or abuse of market position.
- **Conflicts of Interest**: Avoid situations where personal interests could conflict with the interests of the company. Any potential conflicts must be disclosed promptly.
- **Anti-Bribery and Corruption**: We prohibit bribery, corruption, or facilitation payments. Gifts and hospitality must be reasonable, proportionate, and properly recorded.
- **Respect for Confidentiality and Intellectual Property:** Protect confidential information and respect the intellectual property rights of others and the company.
- **Social Responsibility and Sustainability:** Aim to make ethical decisions that support environmental sustainability, digital responsibility, and positive social impact.

7.1 Business Ethics in Partnerships

In addition to standards outlined above, we expect all our business partners, contractors, and service providers to uphold the following principles:

- **Shared Ethical Standards**: Demonstrate a commitment to ethical business practices, including compliance with all applicable laws and regulations, respect for human rights, and environmental responsibility.
- **Fair Employment Practices:** Uphold fair employment standards. This includes prohibiting forced, bonded, or child labour, and ensuring safe, healthy, and inclusive working conditions.
- **Sustainable and Responsible Innovation:** In technology-related collaborations, we encourage responsible innovation that considers ethical implications, user safety, and accounts for long-term societal impact.
- **Trade Controls and Sanctions Compliance:** Partners must comply with all applicable trade controls, export controls, and economic-sanctions regulations, including restrictions imposed by authorities in the UK, EU, US, and other relevant jurisdictions. Partners must not engage in activities that could expose Netcall to risk, and may be required to confirm adherence to our financial-crime and anti-bribery policies where applicable.
- **Monitoring and Accountability:** We reserve the right to assess, audit, or otherwise monitor our partners' compliance with these standards. Where ethical concerns arise, we may require corrective actions or take appropriate steps to safeguard our values and obligations.
- **Conflicts of Interest:** Partners must avoid situations where personal, financial, or other interests could conflict with the best interests of the Group. Any actual, potential, or perceived conflict must be disclosed promptly to HR. HR will assess the situation, agree proportionate safeguards (such as adjusted reporting lines or recusal from decisions), and maintain a record of the decision.

© 2026, Netcall Group | Public.

Partnerships are built on mutual respect, shared values, trust and accountability. We aim to work only with organisations that demonstrate a genuine commitment to ethical business practices. Any breach of these standards may result in the review, suspension, or termination of the partnership.

8 Anti-slavery

Netcall prohibits modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing proportionate systems and controls to help ensure modern slavery is not taking place anywhere in our own business or in our supply chains.

Netcall seeks transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, which is consistent with our disclosure obligations under the Modern Slavery Act 2015. Netcall expects the same standards from all of our customers, contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their suppliers to the same standards.

This Code and the polices listed in Section 10 are intended to help ensure Netcall does not knowingly support or deal with any business involved in slavery or human trafficking.

9 Anti-bribery and corruption

Netcall's position is clear: we conduct our businesses to high legal and ethical standards. We will not be a party to corruption or bribery in any form. Such acts damage the Group's reputation and expose us, and our employees, to the risk of fines and imprisonment. Bribery and corruption are prohibited, and we place the same standard on our employees and third-party representatives.

Indicators of corruption include payments for abnormal amounts, payments made unusually, payment routes to third parties not in the contract, or processes for approval and sign-off are bypassed.

Bribery may be more widespread in some countries, and business sectors, than others. In some cases, you may be told that unless the Group pays a bribe/ or bribes it will not win business or be able to complete contracts. We will not pay bribes, even if this means forgoing business, and we will not engage in any instances of bribery. We all have a responsibility to report any discoveries of bribery and corruption in relation to Netcall's business or that of our suppliers.

It is essential that we keep full and accurate records of all financial dealings. Transparency is vital; false or misleading records would damage Netcall's image. Under money laundering regulations, Netcall's lawyers and accountants are obliged to report anything which appears to be irregular. Netcall cannot maintain its integrity unless we do this. Netcall will investigate all allegations of corruption promptly following the process set out in the Group's Whistleblowing Policy.

© 2026, Netcall Group | Public.

10 Environment

Netcall is committed to conducting its business in a way that seeks to minimise environmental impact. We comply with all applicable environmental legislation and regulations and aim to develop products and processes that meet good environmental standards. We seek to use energy efficiently, to the extend reasonably practicable.

We will manage and seek to minimise environmental risks identified in our business activities and support service activities performed at customers' sites. We will also aim to minimise waste and recover as much as is economically practical and ensure the remainder is disposed of responsibly.

Netcall's suppliers shall be asked to join us in our work for a better environment. Their ability to do so shall be an important factor in our process of selecting suppliers.

11 Health and safety

Netcall recognises its duties as an employer to protect the health and safety of our employees, visitors and those associated with Netcall. Our Health and Safety policy is underpinned by our Health and Safety Management System; a collection of policies and procedures that document how all Netcall employees and suppliers should act with regards to health and safety.

The Health and Safety Management System is reviewed periodically to seek continual improvement in health and safety standards. Individual employees are encouraged and expected to take personal responsibility to ensure that appropriate practices are correctly implemented at all times.

Our principles include:

- Provide adequate control of the health and safety risks arising from our work activities;
- Consult with our employees on matters affecting their health and safety;
- Provide and maintain safe equipment;
- Ensure safe handling and use of substances;
- Provide information, instruction and supervision for employees;
- Ensure all employees are competent to do their tasks and receive adequate training;
- Prevent accidents and cases of work-related ill health; and
- Maintain safe and healthy work conditions.

12 Further information

This Code is supported by:

- Diversity, Equality and Inclusion Policy;
- Anti-harassment and Anti-Bullying Policy;
- Modern Slavery and Human Trafficking Policy;
- Anti-corruption and Bribery Policy;
- Whistleblowing Policy;
- Health and Safety Policy;
- Environmental, Social and Governance Policy; and

© 2026, Netcall Group | Public.

- Disciplinary Policy.

13 Enforcement

We encourage everyone to raise concerns in good faith—confidentially and without fear. Retaliation against anyone who reports a concern or participates in an investigation is prohibited and will itself be treated as misconduct. Concerns can be raised with your line manager, HR, via our Whistleblowing channels, or externally where permitted by law. We will acknowledge, assess and, where appropriate, investigate concerns promptly and communicate outcomes consistent with confidentiality.

The Group's reputation comes from the way it acts.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Anyone who suspects or witnesses unethical behaviour or a breach of this Code is encouraged to report it through appropriate channels, confidentially and respectfully, without fear of retaliation. Anyone who pays bribes on the Group's behalf will be subject to disciplinary action. Equally, the Group will not penalise someone who loses business through not paying a bribe. Please report any breaches via our Whistleblowing Policy or to the HR Director at hr@netcall.com.

14 Review period

This Code will be reviewed annually or sooner if there are changes in legislation, to ensure it remains aligned with business needs and legal requirements.



Mandi Crusco
Chief People Officer
30 October 2026

© 2026, Netcall Group | Public.