

Group Ethical Conduct Policy

Gamma Communications plc (“Gamma”)

Scope

All employees and directors of Gamma Communications plc and its subsidiaries (over 50% ownership).

Core Policy

The Board of Gamma (“the Board”) intends that Gamma be a positive contributor to society as a whole, to the UN Sustainable Development Goals, to its employees, customers, suppliers, shareholders and other stakeholders, and to the environment.

To this end Gamma requires that all its employees and directors.

- a) comply with the law in each jurisdiction where Gamma operates.
- b) where specified in a company policy, meet a higher standard than basic ‘compliance with local law’, and
- c) maintain high ethical standards whenever representing Gamma or its group companies.

Although further aspects of legal and ethical compliance are set out below in more detail they do not limit the above overarching requirement.

Guidance

Where any employee is uncertain about the law or about the interpretation of ‘high ethical standards’ in a particular situation; they should seek guidance from local management, country management or the Company Secretary.

Honesty; respect for colleagues, customers, suppliers and stakeholders; revealing any conflicts of interest, are all elements of the expected high ethical standard.

Reporting

Any employee may, should they have a concern that this or any other policy is being breached, make a report (which may be done anonymously) via the service provided under the Whistleblowing policy.

Equality

Gamma requires that there is no unlawful discrimination within the group and is committed to ensuring that there is equality of opportunity.

As a minimum all employees and group companies are required to comply with local law in this respect.

Within the UK it is unlawful to discriminate on the basis of age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex, pregnancy and maternity, and sexual orientation.

Gamma further expects all group employees and companies to meet this UK standard if it is higher than that imposed by local law.

Diversity

The Board believes that Gamma will be strengthened by increasing the level of diversity throughout the business and aims for Gamma's staff to be representative of all sections of society. Each group company will maintain a diversity policy consistent with this and will monitor against diversity parameters agreed with the Chief People Officer.

Staff wages and conditions

Each company within the group is required to ensure that it provides good working conditions and a fair wage for staff.

Anti-bribery and anti-corruption

Compliance with Gamma's Anti-Bribery and Corruption Policy is mandatory. There are country-specific Gift and Hospitality procedures which reflect local acceptable practices.

Modern Slavery

Certain jurisdictions have legislation and reporting requirements to prevent modern slavery and Gamma requires employees and group companies to comply with local legislation.

Gamma further expects all group employees and companies to meet the UK standard if it is higher than that imposed by local law; and to report internally so that Gamma can report appropriately for the group.

Beyond Gamma's own operations the most influence in this area will come via the policies adopted by the group's procurement functions. These functions are required to follow the local Ethical Procurement policies.

Competition Law

All employees are required to comply with the relevant jurisdiction's competition law and anti-trust laws.

This is most likely to affect sales and product management staff, and occasionally procurement. Where appropriate there will be training for affected staff and participation in this training is mandatory for those identified as attendees.

Data Protection

All employees are required to comply with the relevant jurisdiction's data-protection laws and also the company's internal policies.

Each group company is expected to apply leading standards to the collection, protection and processing of personal data, including using the maximum transparency with users over what is to be collected and seeking clear and explicit consent where consent is appropriate.

Similar policies will be applied by Gamma's procurement function to suppliers who process any personal data.

Share Dealing

Gamma is a public company listed on the AIM market of the London Stock Exchange. As such it is subject to stock exchange regulations.

All citizens are subject to the insider trading laws in their jurisdiction (for instance the Market Abuse Regulation in both UK and EU); and at times certain employees will have access to inside information (i.e., information which could affect the share price if released publicly).

All employees are required to comply with the Group Dealing Policy. Employees who have been informed that it applies to them are further required to comply with the Gamma Dealing Code.

Political Contributions

All employees and group companies are required to comply with the Group Political Contributions Policy

Political Lobbying

All employees and group companies are required to comply with the Group Political Lobbying Policy

Procurement

The Board wishes to assist in the advancement of the UN Sustainable Development Goals where reasonably possible; and the influence of the group's procurement operations in advancing equality, diversity, environmental impact reduction and other values down the supply chain is recognised. The function's approach to achieving this is set out in local Ethical Procurement policies.

Where services of contract staff and consultants are procured via a supply contract, procurement should include in the contract obligations which reflect those requirements of this policy which could apply to an individual.

Confidentiality and Information Security

Each company within the group is required to ensure that employee contracts include confidentiality obligations and that there are local policies covering information security which are approved by the UK Information Security Director.