

# **Aduna Code of Business Ethics**

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Dear colleagues,

At Aduna, we believe communication and technology can shape the world for the better. We are the catalyst for a transformative movement. We bring together the telecommunications industry to create a future where trust, simplicity, and embracing a global perspective lead the way. Our mission is to unlock a world of possibilities by harnessing the ubiquity of mobile networks.

How we achieve this mission matters. Each of us plays a role and we must always act ethically. We have zero tolerance for anything else.

To help guide us, I am pleased to introduce our Code of Business Ethics (the Code). The Code discusses topics of concern for telecommunications and technology companies, our expectations for addressing these concerns, and provides resources for further guidance.

While senior management has a special responsibility to foster a culture of integrity, following the Code is the responsibility of everyone. Our actions have consequences. When considering the right course of action, ask yourself: What am I doing and why? Is it the right thing to do? How will others perceive my action? If you have any doubts about the purpose, principles, or perception of your course of action, pause and seek help from your manager or another resource identified in the Code.

The Code is most useful when understood well and used consistently. I expect you to read the Code, discuss it with colleagues, raise questions, and report concerns. If you see anything that you believe is not right, speak up. You will be protected when you raise concerns in good faith, and we will not tolerate retaliation. I trust you to adhere to the letter and spirit of the Code.

The ultimate success of our mission depends on each of us doing the right thing always.

Anthony Bartolo

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## Use Our Code

Our Code is your guide to Aduna's ethical principles and expectations. It aligns to our values of trust, simplicity, and embracing a global perspective, and empowers each of us to lead with integrity. By referring to it often you can be confident that your actions align with Aduna's expectations of ethical conduct. When evaluating a possible course of action, think about the action's purpose, the principles that should guide the decision, and how the action will be perceived.

What is the purpose of my action?

- Is it in Aduna's best interests?
- What are the risks and how can I mitigate them?

What principles guide my action?

- Is it legal and aligned with the Code and policies?
- Is it ethical and aligned with our values?

How will others perceive my action?

- How would my action look if it were publicly known?
- Will my action negatively impact Aduna's reputation?

## **1. Stay Aware of Aduna's Ethical Expectations**

We conduct our business ethically and responsibly – always.

Our Code sets out our expectations for how we conduct business. The Code applies to all employees of Aduna and our Board of Directors. In addition, we require third parties who work with Aduna to adhere to the values and principles contained in the Code.

We comply with all applicable laws and regulations. In addition, we adhere to our Code and all Aduna guidance. If our Code differs from legal requirements, you must always apply the more demanding standard.

Violations of our Code can lead to disciplinary action, including termination of employment regardless of your position in the company. We understand that people make honest mistakes despite good intentions. If that happens, be accountable, honest, and speak up.

If you're unsure how our Code applies, please ask your manager, Human Resources, or Compliance for guidance.

### **1.1. Know your responsibilities when working for Aduna**

We act ethically and responsibly. We always act with integrity, even if it means losing a business opportunity. Each of us must raise concerns if we know of or suspect violations of the law, our Code or other Aduna guidance, or have any other information that could put Aduna at risk.

We must complete training and certify that we will follow the Code, policies, and other guidance.

We must fully cooperate in any investigations, audits, or assessments conducted by or for Aduna, including providing access to and never destroying or altering work-related data, records, or communications.

If you are a manager, member of senior leadership, or member of the Board of Directors, you have an especially important role – you are responsible for driving a culture of integrity.

All managers must:

- Encourage their teams to ask questions and talk to them about challenging ethical situations;

- Ensure their teams are properly trained and know how to comply with our Code;
- Avoid putting pressure on their teams at the risk of implicitly encouraging unethical conduct; and
- Report potential misconduct and support team members when they raise concerns.

## **1.2. Raise ethics and compliance concerns**

We must all speak up if something doesn't seem right.

If something doesn't seem right:

- Talk to your manager or a more senior leader;
- Talk to Human Resources, Legal, or Compliance; or
- Consult the Aduna speak up line.

Aduna's speak-up line – [integrityquestions@adunaglobal.com](mailto:integrityquestions@adunaglobal.com) – allows for individuals to raise questions or report concerns, anonymously (where permitted by local law), 24 hours a day, 365 days a year; and in whichever language the individual feels most comfortable using.

We speak up when we see or suspect breaches of our Code. Failure to speak up can lead to disciplinary action. You will be protected from retaliation when you raise a genuine concern in good faith. Report any perceived retaliation.

If you are a manager or other trusted person and someone raises a genuine compliance concern to you, you must report it to Compliance. Although it may be necessary to speak with the reporting person to better understand the nature of their concern before you report it, it's important that you do not investigate as doing so may make it more difficult for Aduna to conduct a proper, independent investigation.

Managers should feel empowered to resolve some matters, such as performance issues, but must raise compliance concerns about business ethics and misconduct.

While you must always report potential violations of our Code through the proper Aduna channels, you may also raise concerns with your union or works council representatives.

## **2. Our People and Workplace**

You can reach your full potential and thrive at Aduna. We respect the dignity of everyone.

### **2.1. Treat everyone respectfully and with dignity**

We foster a supportive work environment based on respect. Treating our colleagues with respect and dignity brings out the best in everyone, and it is the right thing to do. At Aduna, ensuring the psychological safety of our employees is paramount and we will not tolerate harassment, threats, bullying, or violence. We must contribute to ensuring Aduna is a place where everyone can grow and feel empowered.

We must:

- Recruit, reward, and promote people based on merit;
- Prevent unfair and discriminatory practices; and
- Avoid any conduct that could make an employee feel unwelcome.

### **2.2. Provide just and favorable working conditions and respect trade union rights**

We uphold everyone is right to just, safe, and favorable working conditions.

This includes:

- Receiving a written document in a language you understand, outlining the basic terms and conditions of your employment;
- Fair and reasonable pay;
- Adequate rest and leisure to support a healthy work life balance; and
- Forming or joining independent unions as well as collective bargaining.

We do not treat anyone differently based on their choice to join – or not join – a union or similar organization and union representatives must be able to communicate effectively with employees.

### **2.3. Ensure health, safety and well-being**

We work together to ensure a safe and healthy work environment. We will do what we can to keep you safe and healthy at work and we expect you to do what you can to look after yourself and others working alongside you.

You must:

- Promote health, safety, and well-being for all in the workplace;
- Never work under the influence of alcohol or illicit or illegal substances;
- Never work while on medication, if doing so could jeopardize anyone's health or safety; and
- Speak up if you have a concern about your or your colleague's health or safety.

#### **2.4. Prohibit and prevent involuntary, coerced, and exploited labor**

We work at Aduna because we have freely chosen to do so. Any form of involuntary, coerced or exploited labor is strictly prohibited. We are all free to leave our employment after giving reasonable notice according to applicable law.

An individual's eligibility for employment must be verified and documented during the hiring process to ensure that they are lawfully able to work for Aduna.

### **3. Our Business, Our Customers, Our Suppliers**

We conduct business with integrity and transparency and are a responsible corporate citizen.

#### **3.1. Conduct business with integrity – and zero tolerance for corruption**

Reputation and trust are hard-won and easily lost. At Aduna, we never seek to improperly influence actions by anyone. Offering or giving any benefit – financial or otherwise – to anyone to gain an undue advantage is bribery, and it is strictly prohibited. You may not demand or accept any such benefits.

We have no tolerance for any form of corruption. You must always ensure that gifts, entertainment, hospitality, sponsorships, donations, political contributions, employment opportunities, and any other financial or in-kind transactions comply with Aduna policies and the law.

#### **3.2. Act in Aduna's best interest**

We act swiftly and transparently to disclose potential and actual conflicts of interest. Situations can arise where our professional judgment could be impaired by other interests related to relationships and roles we have outside of Aduna. This is called a conflict of interest, and it is not inherently wrong. However, we each have a responsibility to put Aduna's legitimate business interests first. Whenever we become aware of a potential or actual conflict of interest, we ensure that it is properly disclosed and handled.

You must:

- Avoid conflicts of interest; and
- Disclose all situations that could be perceived as a conflict of interest to Compliance or Human Resources who will help you manage the situation.

#### **3.3. Compete on the merits of our technologies and offerings**

We compete fairly. We do not seek competitive advantages through illegal or unethical practices. You must not improperly obtain or use confidential information belonging to others, including confidential information that belongs to a previous employer. You must always act within applicable competition, antitrust, and fair-trading laws and regulations in all your dealings with customers, competitors, and suppliers. This means you must not enter into any agreements or otherwise



participate in discussions that could give rise to competition concerns, such as price fixing or fixing other terms of purchase or sale, the sharing of competitively sensitive information, or other cartel-like behavior.

You must check with Legal before negotiating exclusivity or non-compete agreements or if you have concerns about any other competition matters.

### **3.4. Engage only with third parties who share our commitment to integrity**

We only work with third parties who abide by our shared standards of integrity. Consultants, suppliers, and other third parties can present significant risks that we must manage so that they do not compromise our values or reputation.

You must:

- Consider whether engaging a third party is the right course of action for Aduna and, if it is, the rationale for the specific third party that you wish to engage;
- Ensure that Aduna and any third party complete all required diligence and have transparent and properly incentivized compensation terms memorialized in writing in a contract reviewed by Legal prior to using the third party;
- Never use a third party to do something that Aduna employees may not do themselves;
- Take accountability for the risks associated with each third party you oversee and recognize and report any concerns to Compliance;
- Engage in truthful and transparent interactions with third parties, including only paying for goods and services received consistent with the relevant agreements;
- Monitor third parties once engaged and remain vigilant to changes and warning signs;
- Keep accurate records and act on any non-conformities; and
- Manage risk, including terminating contracts when warranted in consultation with Legal and Compliance.

### **3.5. Respect international trade and anti-money laundering laws**

We adhere to applicable laws governing international trade and anti-money laundering.

Numerous jurisdictions enforce trade laws, including export and customs controls, embargoes, and sanctions. These laws limit the persons, countries, regions, and

entities where and with whom we can do business, as well as the technology we may provide.

Contact Compliance when considering a business opportunity or travelling to any sanctioned country or region for guidance about potentially sensitive topics, such as accessing Aduna information, technology, or systems on phones or other devices.

We support free and fair trade and commit to complying with applicable anti-boycott regulations. Always seek advice from Legal if you are unsure of the legality of an action or if you are asked to participate in a boycott.

We are vigilant about financial record-keeping and reporting requirements, and anti-money laundering and terrorism financing laws and regulations. Money laundering is an illegal activity where someone attempts to hide the true origins of money obtained through crime. Terrorist financing is when funds are used to support terrorist activities. Aduna does not allow any activities resulting in money laundering or terrorist financing.

You must:

- Be aware of any sanctions or import or export controls that might apply to your business and ensure that a license is obtained, when required, prior to engaging in the business;
- Ensure that Aduna's sanctions screening process is performed before launching a new product or onboarding new third parties and periodically after that; and
- Never engage in a transaction if you suspect that it involves funds connected with criminal activity.

## **4. Our Assets and Intellectual Property**

We protect Aduna's assets and intellectual property as well as information entrusted to us by our customers and other third parties.

### **4.1. Protect confidential information and intellectual property**

We use confidential information and intellectual property for proper and authorized purposes. Our technical and financial information, as well as our intellectual property, is critical to our success. This includes research and development information, business plans and strategies, and customer and supplier information.

You must:

- Access or share confidential information only if there is a legitimate business reason to do so;
- Only store business-related information on Aduna-authorized devices and cloud services;
- Not take or use Aduna information when you leave the company; and
- Not attempt to improperly obtain information belonging to anyone outside of Aduna.

We all have a responsibility to watch out for security threats, such as malware or phishing, and follow best practices to protect Aduna's information and assets.

You must:

- Keep devices updated with the latest appropriate software versions, change your passwords when prompted, and never share user IDs or passwords;
- Only use approved software, devices and messaging apps; and
- Report all potential security incidents to Security.

### **4.2. Use company information and assets responsibly**

We do not engage in any form of insider trading or using company assets for illegitimate purposes.

Inside information is non-public and material information about Aduna or other companies that would, if disclosed, have a significant effect on the price of financial instruments, such as stock shares. Using this information or providing it to others to trade in financial instruments is illegal.

We use Aduna's IT systems and resources only for business-related activities. You

are responsible for protecting company assets from misuse, waste, and loss. This includes not using Aduna's IT resources for any activity that is illicit, illegal, or otherwise prohibited by our Code.

You must:

- Not buy or sell financial instruments when having inside information, tell others to do so, or share inside information;
- Check with Legal before trading if you are unsure if you have inside information; and
- Use Aduna's IT resources for appropriate activities that are in Aduna's best interests.

### **4.3. Protect personal data**

We collect and process personal data responsibly and in accordance with data privacy laws and regulations. Personal data is any kind of information that can be related to an identifiable person, such as an employee. We adhere to global privacy principles and laws applicable to Aduna; you are responsible for confirming with Compliance prior to using, storing, or transmitting any personal data.

You must:

- Collect and process personal data in accordance with applicable laws, data protection principles, and Aduna guidance, and only collect the minimal personal data required;
- Use personal data only for legitimate business purposes;
- Ensure that people from whom we obtain personal data are informed and can understand why it is collected and processed;
- Share personal data securely and only with others authorized to receive and process such data; and
- Report any suspected data breaches to Security.

### **4.4. Responsible Use of Artificial Intelligence**

We harness the power of artificial intelligence in a manner that aligns with our values of trust and simplicity, and our respect for human rights. Our guidelines ensure that Aduna will foster trust, innovation, and accountability in all AI-related activities, ensuring that technology serves the best interests of our employees, customers, and society.

All employees and third parties working on our behalf must adhere to the following principles when developing, deploying, or using AI systems:

- **Transparency:** Clearly communicate when and how AI is used in our products, services, or internal processes. Ensure that AI-driven decisions are explainable and understandable to affected stakeholders;
- **Fairness and Non-Discrimination:** Proactively identify and mitigate biases in AI systems. AI must not be used to discriminate against individuals or groups based on protected characteristics;
- **Accountability:** Assign clear responsibility for the oversight, monitoring, and maintenance of AI systems. Human oversight must be ensured, especially for decisions with significant impact;
- **Privacy and Data Protection:** Use personal data in AI systems only in compliance with applicable data protection laws and Aduna's policies. Implement robust data governance and security measures;
- **Safety and Security:** Regularly assess AI systems for potential risks, including unintended consequences, and take prompt action to address vulnerabilities; and
- **Continuous Improvement:** Monitor AI systems for performance, fairness, and compliance. Update and improve systems as new risks, regulations, or best practices emerge.

You must:

- Complete training on ethical AI use and certify compliance with this section of the Code;
- Report any concerns about the ethical use of AI, including potential bias, misuse, or security risks, through established channels; and
- Refrain from using AI for purposes that conflict with Aduna's values or legal obligations.

#### **4.5. Maintain proper financial controls and prevent fraud**

We record all financial information diligently, accurately, and honestly.

We take steps to prevent fraud and financial irregularities. We must record all transactions accurately and transparently. Making false or misleading entries in our records, or sidestepping internal controls, is prohibited. Always check with Finance if you are unsure what to do or have concerns.

You must:

- Comply with procurement and approval processes and enter into written (never oral) agreements with third parties that reflect the transaction's substance, have been reviewed and approved by Legal, and are in Aduna's best interest;
- Record all financial transactions accurately, transparently, and in accordance with applicable rules, and ensure that they are supported by appropriate documentation; and
- Use the correct general ledger account to ensure accurate accounting.

#### **4.6. Communicate responsibly**

We speak on behalf of Aduna only if authorized to do so and take care with social media. Our reputation depends on the transparency, accuracy, and consistency of our public statements. While we promote freedom of expression, each of us is responsible and is accountable for or comments inconsistent with our values and Code.

You must:

- Use good judgment and abstain from sharing any confidential information about Aduna unless approved by Legal and under a non-disclosure agreement;
- Make clear that your views are your own and that you do not speak for Aduna (unless you are authorized to do so); and
- Not post anything that would embarrass or harm Aduna.

## **5. Our Social and Environmental Engagement**

We respect human rights, reduce negative environmental impact, and support socio-economic development across the communities in which we work. Environmental sustainability is integrated across our company – a mindset we share as part of Aduna’s workforce.

### **5.1. Promote the right to privacy and freedom of expression**

We respect the right to privacy and freedom of expression. We believe that our technology and services bring positive changes. We work to minimize the risk of potential misuse of our technology and services. We also advocate for freedom of expression and privacy protections, individually and collectively with other stakeholders.

### **5.2. Empower and support local communities**

We empower and support local communities to drive positive impact. We assess our potential involvement to ensure that it is consistent, impactful, free of any actual or potential conflicts of interest, and is not associated with improper payments. Aduna employees shall follow the relevant Aduna guidance and obtain the relevant approvals before making any definitive commitment.