

Supplier Code of Conduct

Message from our CEO

Dear Supplier Partner,

With the support of our parent company 3i Infrastructure, we are progressing on an exciting path of growing our business and capabilities.

Today we are more collaborative, customer focused, cost-conscious and competent than ever before. While our Core Values of Customer First, People First, Ownership First and Growth First guide our employees on our journey, this Supplier Code of Conduct and Business Ethics ("Supplier Code") will act as a polestar for our day-to-day interactions with, and behaviour we expect from, our suppliers and business partners.

The Supplier Code will apply for all partners of the GCX business (being GCX Managed Services Limited and all its subsidiaries). We expect our partners to have a company culture that sets the highest standards of governance, openness, mutual respect, trust and integrity, and creates a safe and positive work environment where your employees can speak up without fear of reprisal .

Our Supplier Code reflects the standards that our customers and stakeholders expect of us, and we should demand no less from each other.

Adherence to our Supplier Code is a way to ensure mutual success over the long term. It's not only about doing the right thing but will also ensure we continue to protect our respective businesses and reputation.

We look forward to a positive engagement with you.

Contents

Human Rights 3

Compliance With Laws 3

Economic And Trade Sanctions..... 3

Preventing Tax Evasion 3

Conflict Of Interest..... 3

Work Environment 3

Gifts And Hospitality..... 4

Business Partners, Vendors And Customers 4

Sustainability..... 4

Protection Of Confidential Information 4

External Communications 5

Accounting Controls, Procedures And Records..... 5

Political Activity..... 5

Intellectual Property 5

Information Security 5

Security Commitments To The U.S. Government 5

Fraud..... 6

Reporting Violations..... 6

Relationship with our contracts..... 6

Human Rights

Suppliers should support the protection of human rights in accordance with the United Nations [Universal Declaration of Human Rights](#) and [Guiding Principles](#), and the [ILO Declaration](#). Our employees are required to set the same standards of commitment to the human rights values across all our business interactions and dealings, both internal and external.

Compliance With Laws

Suppliers are to behave in an ethical manner, understand and comply with all laws, rules and government regulations that apply when working with us. Your employees need to know and follow the law and conduct themselves in an ethical manner. Any violation of applicable law, rules and regulations could result in us taking legal action.

Suppliers must adhere to all applicable laws, including the following:

- Antitrust and competition laws
- Laws regarding anti-corruption, bribery and improper payments
- Money laundering and terrorist financing
- The UK's Modern Slavery Act

Economic And Trade Sanctions

Suppliers must comply with all applicable laws and regulations governing economic and trade sanctions in all countries where we do business. This includes the Sanctions Laws administered by the United Kingdom, United States, European Union, and similar regulations in other jurisdictions.

Suppliers are prohibited from engaging in or supporting business activities with individuals, entities, or countries subject to sanctions, including those under United Nations, EU, or U.S. sanctions as well as with countries that are subject to comprehensive sanctions (broadly prohibited countries).

Preventing Tax Evasion

Suppliers must have a zero-tolerance approach to tax evasion whether under UK law or under applicable local law in countries where we operate. Suppliers are expected to be open and honest when dealing with the tax authorities and must not be involved in any form of tax evasion.

Conflict Of Interest

All Suppliers must be able to perform their duties and exercise judgment without influence or impairment due to any activity, interest or relationship that arises outside of work. Situations that could cause a conflict include doing business with family members, having a financial interest in another company with whom we do business, or being employed or engaged by our competitors.

Work Environment

Suppliers should be committed to maintaining a respectful, safe, and inclusive work environment, promoting equal opportunities for all employees. They should value diversity, equity, and inclusion, and ensure that all individuals are treated with respect, regardless of race, gender, age, disability, sexual orientation, or other personal characteristics. Your employees are expected to conduct themselves with respect towards colleagues, and harassment of any kind will not be tolerated. Suppliers should enforce a strict policy against drug and alcohol abuse ensuring that employees perform their duties safely and responsibly.

Suppliers have an obligation to carry out their activities in ways that preserve and promote a clean, safe and healthy environment and employees should be able to immediately report any accident, injury, or unsafe equipment, practices or conditions in accordance with Health and Safety guidance.

Gifts And Hospitality

Suppliers should never give or accept anything of value from anyone if doing so could be construed as unduly influencing, or an attempt to unduly influence, the objectivity of business decisions.

Business Partners, Vendors And Customers

Suppliers should be committed to dealing fairly with their own suppliers and partners. Your employees must maintain confidentiality regarding business or sensitive information and avoid influencing any selection process. All agreements must be properly documented, specifying terms, payment details, and applicable rates.

In dealing with prospects and customers, we prioritise customer satisfaction and integrity, ensuring accurate representations of products or services and full compliance with legal and contractual obligations and we expect the same level of transparency from our Suppliers. Suppliers must avoid informal agreements that could impact transactions, particularly with government or regulatory clients.

Suppliers must ensure that all employees, vendors, partners, subcontractors and agents within its supply chain commit to principles at least as stringent as those set out in this Supplier Code, and must commit to taking action to resolve any non-compliance with these principles by such parties, including legal action where necessary in the event of serious non-compliance.

Sustainability

GCX integrates long-term sustainable business growth considerations into all business decisions, ensuring that our operations are sustainable and ethical. We believe in creating a positive impact on people, the planet and society.

Our Sustainability Vision and Mission (as set out in the Sustainability Report published on our website) is built on five key pillars and we expect our Suppliers to share these values and goals:

- Be an employer of choice
- Be a valued partner
- Enable communities to flourish
- Operate with stewardship
- Protect our planet

We expect our Suppliers to take a similar approach to sustainability, and to grow sustainably by creating positive outcomes for your customers, inspiring your employees, and enabling the communities where you operate to thrive.

Protection Of Confidential Information

Suppliers must protect the confidentiality of our information, using it solely for business with us and not disclosing or reproducing it without prior authorisation, except when required by law. This includes third-party information covered by Non-Disclosure Agreements. Suppliers must comply with insider trading laws and

protect their assets from misuse. Personal data must be handled with care to respect privacy and prevent unauthorised access or use.

External Communications

Suppliers should be committed to accurate and timely communication of newsworthy information to the public while complying with its legal obligations, confidentiality commitments and respecting personal privacy. Suppliers must not make any statements about us in any other communication medium which is likely to attract public attention without our express written management approval.

Accounting Controls, Procedures And Records

Suppliers should be committed to ensuring that the disclosures in their filings with government agencies and all other public communications are full, fair, accurate and timely. In this respect, Suppliers should have developed and maintain a system of internal accounting controls and procedures in order to provide reasonable assurance that transactions within the company are properly authorised, recorded and are in compliance with all applicable laws. Each Supplier employee is expected to be familiar with, and to adhere strictly to, these internal controls and disclosure controls and procedures.

Political Activity

Suppliers must fully comply with all political contribution laws. Company funds may not be used for political contributions to any party, committee, or candidate unless permitted by law and in accordance with company policy.

Intellectual Property

Suppliers should respect the proprietary rights of others by complying with all applicable laws and agreements, including those with business providers, competitors, and customers. Suppliers must not acquire the intellectual property of others through unlawful or inappropriate means.

Information Security

Suppliers must protect confidential information, avoid discussing it, and share it only for legitimate business purposes. Storing confidential and business-related information should only be done with authorised devices and cloud services. Security best practices include keeping devices updated, using a secure VPN for remote access, and encrypting sensitive emails. Only authorised software and communication tools should be used, and passwords must never be shared.

Security Commitments To The U.S. Government

We are subject to security compliance requirements from various U.S. Government agencies and we expect our suppliers to cooperate in meeting these obligations. Our compliance requirements encompass several key areas, and all Suppliers providing services that relate to our U.S. network, customer data or cable systems that land in the U.S. are expected to read, understand, and comply with these obligations as outlined in any supply contracts between us.

Fraud

Suppliers must ensure that business transactions are recorded transparently and accurately. Making false or misleading entries in company records, or not adhering to internal controls, is strictly prohibited and may be illegal. Your employees have the responsibility to report any concerns, or information they receive, about any fraud in connection with the affairs of our company.

Reporting Violations

Suppliers have a responsibility to report any concerns, or information they receive, about any violations to the Supplier Code. All such reports should be made to a member of our Leadership team.

From time to time, we may ask you to certify your compliance with this Supplier Code, which we expect you to provide within 30 days of request (highlighting any non-compliance).

Relationship with our contracts

This Supplier Code may include obligations additional to those set out in your contracts with us. The obligations in this Supplier Code are deemed to be incorporated into those contracts, and any breach of these obligations shall be deemed a material breach of those contracts.

Where possible, the Supplier Code shall be read consistently with our contracts. To the extent of any inconsistency, the executed contracts shall take precedence.