



Corporate Ethics Policy

1. Purpose

Panorama Antennas is committed to a high ethical standards and at all points to meet and, where possible, exceed legal requirements. We believe that conducting our business ethically and responsibly is not only the morally right thing to do but is also good for business, leading to long lasting, stable relationships between Panorama and its stakeholders based on trust and mutual advantage.

This policy is intended set out the ethical boundaries which guide Panorama Antennas in conducting its business. It is intended not only to communicate to our stakeholders what level of ethical behaviour Panorama expects of them but also what they can expect from Panorama.

2. Scope

This policy applies to Panorama Antennas Ltd and its Subsidiary Companies ("The Company"), employees, contractors and anybody else conducting work for The Company ("Workers"), anybody acting on behalf of The Company in any other capacity ("Agents") and any supplier of goods and services to The Company ("Suppliers"). It applies to all business activities of The Company, its Workers, Agents and Suppliers globally.

3. Policy

A. Fair and Safe Working Conditions

Unfair working and unsafe conditions in the worst case can lead to injury or death. On a day-to-day level they lead to a stressed, tired, demotivated and inexperienced workforce resulting in the creation of a poor quality product. Panorama Antennas prohibits unfair and unsafe labour practices. The Company, its Workers, Agents and Suppliers will:

- provide a safe and healthy workplace for all workers in full compliance with local regulations;
- ensure any accommodation provided or arranged for workers meets local housing and safety standards;
- not engage in any form of forced labour or human trafficking (Modern Slavery);
- give all employees the choice to leave employment freely, without financial penalty, upon giving reasonable notice;
- provide all workers with detailed, accurate work agreements in a language understood by each worker;
- never withhold worker identity or immigration documents;
- never charge fees to workers or potential workers in relation to the recruitment process;

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- follow local wage regulations and / or collective agreements and where these do not exist, compensate employees in line with the prevailing local sector wage;
- provide payment for return transport to any foreign migrant worker recruited abroad on completion of their contract period, except where they have chosen to voluntarily and legally remain in the country;
- respect the personal dignity, privacy and rights of each individual;
- refrain from employment discrimination based on gender, colour, ethnicity, religion, disability, union membership, political affiliation or sexual orientation and comply with all applicable laws on employment discrimination;
- respect the rights of employees to freely associate and bargain collectively;
- not engage in or allow any behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative;
- refrain from procuring commercial sex acts in a business context;
- allow workers at least one (1) uninterrupted day off per week and wherever possible prevent working hours from exceeding sixty (60) hours a week including overtime; and
- conduct documentation checks of all workers (including proof of age documents) before they begin employment to ensure they are eligible to work.

B. Child Labour

In accordance with the definition used by the International Labour Organisation, Panorama Antennas Considers a Child to be under the age of 18 and Child Labour to be work that deprives children of their childhood, potential and dignity, and that is harmful to their physical and mental development. Panorama Antennas prohibits Child Labour. The Company, its Workers, Agents and Suppliers will:

- never allow a child to be enslaved, forced into labour, trafficked or subjected to debt bondage;
- never allow a child who is below the minimum age specified for a kind of work as defined by national legislation and in accordance with accepted minimum standards to perform that work; and
- never allow a child to perform hazardous work that may jeopardize the child's physical, moral or mental wellbeing because of its nature or because of the conditions under which it is carried out.

C. Bribery

Bribery is theft, transferring public or corporate money into private hands for services that should have been provided without inducement. Bribes can facilitate breaches of security, consumer protection and environmental regulations, putting the public at risk. Bribery can significantly slow business, as activity is delayed awaiting a bribe, and creates business risk, as there is no recourse if an action facilitated by a bribe



is not undertaken. Panorama Antennas prohibits bribery in all forms. The Company, its Workers, Agents and Suppliers will:

- follow all local regulations aimed at countering bribery in every jurisdiction in which business is conducted;
- avoid actual, potential or perceived conflicts of interest which may give rise to a risk of bribery;
- notify The Company of any actual, perceived or potential conflict of interest amongst its Workers, Agents or Suppliers;
- refuse to engage in any giving or receiving of bribes, directly or indirectly, including facilitation payments, whether intended for commercial advantage, personal gain, familial gain, the gain of friends or acquaintances or any other reason;
- never give or receive hospitality, gifts or expenses that might or might reasonably be perceived to improperly influence the outcome of business transactions;
- retain records of all hospitality or gifts received and offered. These records should be periodically reviewed by management to ensure all gifting is proper;
- not make direct or indirect donations to political parties, organisations or individuals engaged in politics, as a way of obtaining unfair advantage in business; and
- not use charitable contributions or sponsorship as a subterfuge for bribery.

D. Environmental Responsibility

Engaging in environmentally friendly practices is not only important for the future of the planet but also helps The Company to reduce costs and improve efficiency. The Company is committed to a process of continual improvement to attain the highest possible environmental standards. The Company, its Workers, Agents and Suppliers will:

- identify the environmental impacts of business processes and products;
- work to continually reduce these environmental impacts;
- work to eliminate Conflict Minerals from its supply chain and only source such materials from CFSI approved smelters; and
- ensure all products supplied are fully compliant with EU Directive 2011/65/EC 'RoHS 2' and EU Regulation 1907/2006 - 'REACH' and their amendments.

E. Fair Trading

The Supplier will conduct its business in an ethical manner in accordance with all applicable rules and regulations. The Company, its Workers, Agents and Suppliers will:

- adhere to anti-trust and other competition laws, e.g. not participating in price fixing or bid-rigging;



- refrain from misleading promotion, e.g. displaying quality marks without necessary authorisation, engaging in unfair comparison with competing products, displaying incorrect country of origin information, using misleading branding; and
- protect all commercially confidential information.

F. Business Continuity Planning

The Supplier shall maintain policies to mitigate its exposure to business continuity issues including but not limited to terrorism, crime, business threats, pandemics, natural disasters and major accidents.

G. Procurement

The Company expects Suppliers to obtain confirmation from each sub-supplier providing goods or services directly or indirectly to Panorama Antennas that the sub-supplier acts in compliance with this policy.

4. Training and Communication

This policy and relevant guidance has been communicated to all Workers, Agents and Suppliers through our established internal communication channels. We conduct training with interested parties to ensure this policy is implemented effectively.

5. Raising Concerns and Seeking Guidance

In the event of a breach, perceived breach or potential breach of this policy, in line with The Company's Speak Up policy, Workers, Agents and Suppliers should:

- contact their line manager or normal Company contact immediately to report it; or
- in more serious cases or where the report concerns a line manager or regular Company contact, the individual should raise the issue with a more senior manager, bypassing lower levels;

A handwritten signature in cursive script that reads "Andrew Lesma".

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Managing Director