

GCX Code of Conduct and Ethics Summary

MESSAGE FROM THE CEO

Team,

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

- Continue building upon and executing our people agenda, good governance and sustainability in how we operate;
- Creating value through Geographic expansion;
- Be recognised in the industry as an innovator through new products and solutions;
- A commitment to exemplary customer service.

Today we are more collaborative, customer focused, cost- conscious and competent than ever before. While the GCX Core Values of Customer First, People First, Ownership First and Growth First guide us on our journey, the GCX Code of Conduct and Business Ethics will act as a polestar for our day-to-day actions and business decisions.

The GCX Code of Conduct and Ethics, guides us on choosing the right approach from the wrong one, how to prioritise certain business aspects over others, how to act when faced with an ethical dilemma and how to achieve our business goals while acting in accordance with the correct principles or ethics and compliance.

Our continuing aim is to ingrain in our company culture the highest standards of governance, openness, mutual respect, trust and integrity, where an employee can speak up without the fear of reprisal. Guided by the GCX Code, our ethical behaviour and ethical choices will drive GCX's efforts to foster a safe and positive work environment.

Our Code of Conduct and Ethics sets the standards that our customers and stakeholders expect of us, and we should demand no less from each other. As the CEO, I encourage you to let the GCX Code of Conduct and Ethics become the bedrock of every business interaction, action and business decision that you take on behalf of GCX, on a daily basis. Let it guide you to boldly move forward and progress, while managing risk, and working in synergy with our fellow employees, customers, partners, and other stakeholders.

I am extremely proud of all we've achieved together as a team and strongly believe in the immense potential that we have to achieve more. Adherence to the Code of Conduct and Ethics is a way to ensure GCX's success over the long term. It's not only about doing the right thing but will also ensure we continue to protect our business and reputation.

HUMAN RIGHTS

GCX supports the protection of human rights in accordance with the United Nations [Universal Declaration of Human Rights](#) and [Guiding Principles](#), and the [ILO Declaration](#). GCX 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

GCX's policy is to behave in an ethical manner, understand and comply with all laws, rules and government regulations that apply to the business. 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 the Company taking disciplinary action.

GCX adheres to the following laws:

- Antitrust laws
- Laws regarding anti-corruption, bribery and improper payments
- Money laundering and terrorist financing

ECONOMIC AND TRADE SANCTIONS

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

Employees 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

GCX has a zero-tolerance approach to tax evasion whether under UK law or under local law in countries where GCX operates. Employees 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 Employees must be able to perform their duties and exercise judgment on behalf of GCX 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 GCX does business, taking a second job, service on Boards, etc.

WORK ENVIRONMENT

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

Employees also have an obligation to carry out company activities in ways that preserve and promote a clean, safe and healthy environment and should immediately report any accident, injury, or unsafe equipment, practices or conditions in accordance with the Company's Health and Safety guidance.

GIFTS AND HOSPITALITY

Employees 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

GCX is committed to dealing fairly with suppliers. Employees must maintain confidentiality regarding supplier information and avoid influencing the selection process. All agreements must be properly documented, specifying terms, payment details, and applicable rates.

In dealing with prospects and customers, GCX prioritizes customer satisfaction and integrity, ensuring accurate representations of products or services and full compliance with legal and contractual obligations. Employees must avoid informal agreements that could impact transactions, particularly with government or regulatory clients.

CORPORATE SOCIAL RESPONSIBILITY ("CSR")

With the help of CSR activities, GCX believes it can create a positive impact on people, the planet and society. GCX's Environment Social and Governance ("ESG") vision statement includes their goal to promote social or economic improvements in the communities close to our HQ and in those communities that benefit from our connectivity services.

PROTECTION OF CONFIDENTIAL INFORMATION AND COMPANY PROPERTY

Employees must protect the confidentiality of Company information, using it solely for Company business and not disclosing or reproducing it without prior authorisation, except when required by law. This includes third-party information covered by Non-Disclosure Agreements. The obligation to maintain confidentiality continues after employment.

Employees must comply with insider trading laws and protect Company assets from misuse and return all property upon departure. Personal data must be handled with care to respect privacy and prevent unauthorised access or use.

EXTERNAL COMMUNICATIONS

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

ACCOUNTING CONTROLS, PROCEDURES AND RECORDS

GCX is committed to ensuring that the disclosures in the Company's filings with government agencies and all other public communications are full, fair, accurate and timely and each Employee is to work diligently towards this goal. In this respect, GCX has developed and maintains a system of internal accounting controls and procedures in order to provide reasonable assurance that transactions within the Company are properly authorized, recorded and are in compliance with all applicable laws. Each Employee is expected to be familiar with, and to adhere strictly to, these internal controls and disclosure controls and procedures.

POLITICAL ACTIVITY

GCX fully complies 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. Employees are prohibited from lobbying other employees on behalf of political candidates during work hours and may not be reimbursed for political contributions or expenses. Outside of office hours, employees are free to participate in political activities and make personal political contributions as they choose.

INTELLECTUAL PROPERTY

GCX respects the proprietary rights of others by complying with all applicable laws and agreements, including those with business providers, competitors, and customers. Employees must not acquire the intellectual property of others through unlawful or inappropriate means. Employees may not copy, use, or share copyrighted materials unless specific or written consent is provided by the owner, or unless such use is permitted under applicable law.

INFORMATION SECURITY

Employees 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 GCX 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

GCX is subject to security compliance requirements from various U.S. Government agencies. Our compliance requirements encompass several key areas ("Scope of Obligations") and all relevant personnel are expected to read, understand, and comply with these obligations as outlined in related training and communications.

FRAUD

Employees 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. Employees have the responsibility to report any concerns, or information they receive, about any fraud in connection with the affairs of GCX.

SUSTAINABILITY

GCX aims to grow sustainably by creating positive outcomes for its customers, inspiring its Employees, and enabling the communities where it operates to thrive through connectivity. The GCX ESG Mission Statement is built on five key pillars:

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

GCX Employees must align their daily activities and tasks in accordance with the ESG goals.

REPORTING VIOLATIONS

Employees have the responsibility to report any concerns, or information they receive, about any violations to the GCX Code of Conduct and Ethics. All such reports should be made to the manager, Head of Department, any member of management, HR or they can raise a report via the GCX "Speak Up Line", if appropriate, by visiting the GCX Speak-Up line at <https://integritycounts.ca/org/gcx>