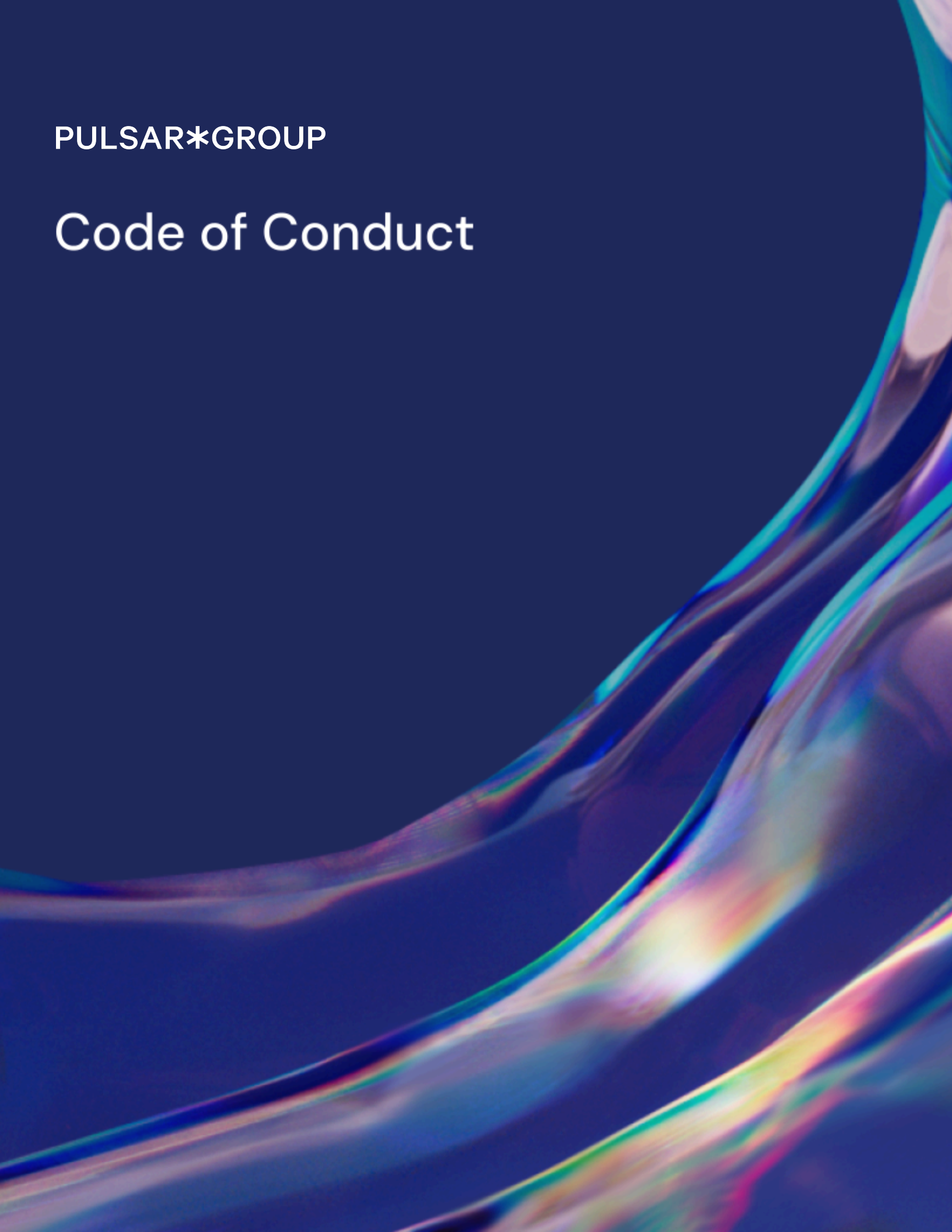


PULSAR*GROUP

Code of Conduct



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INTRODUCTION

Position Statement

Pulsar Group Plc (formerly Access Intelligence) and its subsidiaries (including its subsidiaries operating the Pulsar Group, Pulsar, Isentia and Vuelio brands globally) (**Group or Pulsar Group**) are committed to best practice corporate governance and maintaining ethical standards in relation to the conduct and operation of its business activities.

Values

We capture what we most value and how we want to operate in our four Group Values:

- **Innovate at Speed** – We continuously improve what we offer through experimentation, a bias for action, willingness to learn and rebounding from mistakes without blame.
- **Challenger Mindset** – We challenge respectfully because we care about what we build and who we build it with and our mindset embraces healthy debate, honest feedback and stretching ourselves.
- **Deep Expertise** – We are problem-solvers who know our stuff, but remain curious and foster a culture of knowledge-sharing with our customers and with each other.
- **Stronger Together** – We do our best work by inviting and accommodating multiple perspectives and working towards common goals.

Team Members must familiarise themselves with the Group Values and aim to live up to them in their daily activity at work. Simple Self-Reflection Prompts and further detail on the How (the behaviours) and the Why (the purpose) of our Values is included in the Our Group Values document.

SCOPE

This Code of Conduct (**Code**) applies to all Team Members wherever located.

Team Member means all of Pulsar Group's officers, employees (whether full time, part time or casual and including executives and managers) and contractors (including consultants, advisers, agents, interns and free agents).

PURPOSE

The purpose of this Code is to provide guidelines to Team Members in relation to personal conduct in the workplace and business conduct and Group's expectations of Team members in relation to ethical conduct.

RAISING A CONCERN OR WHISTLEBLOWING

All Team Members:

- are encouraged to report any actions which they are concerned about and maybe inconsistent with this Code,
- must report any suspected breaches of this Code or any illegal or unethical practices that they become aware of, and
- must report any suspected Fraudulent Conduct immediately in accordance with this Code.

In the first instance, Team Members should report any concerns or suspected breaches of this Code to their relevant manager or, if inappropriate in the circumstances, to the People team, the CFO or CEO.

The Group has adopted a Whistleblower Policy setting out in more detail the Group and Team Members obligations in regard to Whistleblowing. Team Members should familiarise themselves with this policy and ensure they comply with that policy at all times.

PERSONAL CONDUCT IN THE WORKPLACE

Ethical Conduct

Team Members must conduct themselves with openness, honesty, fairness and integrity in all business transactions and in all dealings with others including customers, shareholders, other Team Members, suppliers, creditors, financiers, the financial markets and the general public.

Mutual Respect

Team Members are expected to treat each other, customers, shareholders and anyone else with whom they interact in their work, with courtesy and respect.

The Group has a Working with Respect Policy. Team Members must familiarise themselves with this policy and ensure they comply with that policy at all times.

Confidentiality

Confidential information includes but is not limited to all trade and business secrets, operations, processes, business strategy, competitive analyses, business and financial plans and forecasts, information relating to projects including joint venture information, employee information, customer data, computer systems and other inventions developed or licensed by, or for, the Group together with any other confidential information or documents relating to the affairs or business of Pulsar Group.

Team Members must safeguard the Group's confidential information at all times and, except as authorised by Pulsar Group or as required in the discharge of duties or obligations to Pulsar Group, must not directly or indirectly reveal confidential information to any third party.

Privacy

Team Members may have access to records which contain information that may be of a personal nature, or that Pulsar Group has obtained to assist in the management of its business. This information is private and confidential and may not be disclosed to any unauthorised third party. Team Members must respect the privacy of others.

Pulsar Group has adopted a Privacy Policy which describes its obligations in regard to privacy. Team Members must familiarise themselves with this policy and ensure they comply with that policy at all times.

Intellectual Property

Any and all intellectual property rights whether or not such rights are capable of being protected by copyright, letters patent, registered design or other protections, which arise directly or indirectly in the course of any Team Member's engagement or employment with Pulsar Group belong to and are the absolute property of Pulsar Group.

All Team Members must disclose full and complete information relating to any intellectual property created and must co-operate to the fullest extent in the establishment of Pulsar Group's right to all intellectual property.

Equal Opportunity

Pulsar Group actively supports the principle of equal employment opportunity regardless of race, religion, national origin, sex, age, physical disability, marital status or sexual orientation and expects all Team Members to practise and support this principle.

Pulsar Group seeks to avoid discriminatory practices of any kind and to make employment and business decisions strictly on the basis of individual ability, performance, experience, and Pulsar Group's requirements. Pulsar Group has a Diversity, Equality & Inclusion Policy. Team Members must familiarise themselves with this policy and ensure they comply with that policy at all times.

Harassment

Pulsar Group believes that every individual has the right to dignity and respect in the workplace. Pulsar Group regards any personal, physical or sexual harassment as totally unacceptable. This applies to all Team Members regardless of their position. Pulsar Group has a Working with Respect Policy. Team Members must familiarise themselves with this policy and ensure they comply with that policy at all times.

Health and Safety

Pulsar Group is committed to protecting the health and safety of its Team Members, customers, visitors and the public. Pulsar Group expects and requires all Team Members to comply with all relevant workplace health, safety and environment laws and Pulsar Group policies.

Pulsar Group has a Health, Safety and Wellbeing Policy and guidance in handbooks relating to health and safety responsibilities and expected behaviours which are available on our HRIS and from the People Team. Team Members must familiarise themselves with the policies and guidance and ensure that they comply with them at all times.

Use of Pulsar Group's Resources Generally

Team Members must use all Pulsar Group assets for proper purposes during their employment with Pulsar Group. Improper use includes unauthorised personal use of Pulsar Group's assets, data or resources, including computer equipment, software, photocopies, facsimile machines, telephones, vehicles, facilities, materials and supplies.

No property of Pulsar Group may be sold, loaned, given away, or otherwise disposed of, without proper authorisation.

Team Members who undertake business travel or incur business expenses must ensure they understand the applicable Expenses and/or Business Travel Policies. Team Members are expected to act in the interests of the Company to keep costs low without impairing the efficiency of the company; to remain within any spending limits; to complete expense records honestly and to submit them as soon as possible and with enough detail to explain any purchases.

Use of Pulsar Group information technology

Team Members have access to a wide range of Pulsar Group information technology and communications systems to assist them in the performance of their work. All Pulsar Group information technology and the data created and stored on it are the property of Pulsar Group and Team Members are required to use Pulsar Group information technology responsibly at all times.

Whilst Team Members are entitled to incidental and occasional personal use of Pulsar Group information technology, they are prohibited from using Pulsar Group information technology for their own commercial purpose or for a commercial purpose not approved by Pulsar Group, accessing and downloading inappropriate or unlawful material, and using Pulsar Group information technology in any way in violation of a applicable law relevant to the location of the Pulsar Group information technology.

To the extent permitted by law Pulsar Group reserves the right to monitor or audit Team Members use of Pulsar Group information technology and access, review and disclose data stored on Pulsar Group information technology for maintenance, business needs or to meet legal or policy requirements.

Pulsar Group has adopted an Information Security Policy which describes the security controls in place to protect against a loss of information confidentiality, integrity or availability. Team Members must familiarise themselves with this policy and ensure that they comply with that policy at all times.

More information about Pulsar Group's security & privacy posture is available in the Trust Centre:

<https://www.pulsargroup.com/trust-centre/security/>

BUSINESS CONDUCT

Compliance with Laws

Pulsar Group is committed, as a minimum standard, to complying with all applicable laws of the countries in which it operates. These include financial, corporate, disclosure, fair trading, environmental, safety and many other requirements.

All Team Members must be aware of and comply with both corporate and individual duties and obligations which apply to the conduct of business in the country or countries in which they work. This includes understanding and keeping up to date with the relevant standards, regulations and laws and any applicable policies adopted by Pulsar Group.

Team Members should seek advice from the Legal Team if they are unclear about laws or regulations relating to their work or place of work.

More information about Pulsar Group's corporate governance & compliance posture is available in the Trust Centre: <https://www.pulsargroup.com/trust-centre/corporate-governance/>

Financial Integrity

Pulsar Group is committed to compliance with all applicable accounting and financial reporting rules, laws and regulations in each country in which it operates. We conduct our business in an honest and ethical manner and do not facilitate tax evasion. Pulsar Group has stringent financial accounting procedures that are overseen by management, the Pulsar Group board and the external auditor.

Team Members must ensure that all transactions are properly authorised and are truthfully, accurately and completely recorded in the relevant accounts and records as required by law and applicable Pulsar Group standards or requirements.

All records and accounts must be appropriately retained and not disposed of other than in accordance with Pulsar Group practices and applicable laws and regulations.

Compliance with Pulsar Group standards of financial reporting is mandatory. Falsifying records or misrepresenting facts may constitute fraud and can result in civil or criminal liability for Team Members and Pulsar Group.

Any Team Member concerned about the validity of any financial process or recordkeeping activity should immediately report the concern to their manager, People team, the CFO or to the Legal Team.

Fraudulent Conduct

Fraudulent Conduct must be reported to the CFO or CEO immediately upon detection or suspected detection.

Fraudulent Conduct means the intended or actual misuse of Pulsar Group's funds, including through deception to obtain an unjust or illegal advantage. Examples of Fraudulent Conduct include, but are not limited to:

- stealing money or other assets including use of assets for private purposes,
- misappropriation of funds, securities, supplies, or other assets,
- impropriety in the handling or reporting of money or financial records,
- profiting from insider knowledge of Pulsar Group's activities,
- unauthorised disclosure of confidential and proprietary information with the intent to receive a benefit,
- forgery or alteration of any document or account belong to Pulsar Group,
- unauthorised destruction, removal, or inappropriate use of records or other Pulsar Group property,
- accepting or seeking anything of value from contractors, vendors or persons providing services or goods to Pulsar Group,
- creating and paying fictitious employees (i.e. ghost employees),
- falsifying invoices for goods or services never rendered, or expense reimbursement claims,
- Inflating amounts on, or backdating, invoices or expense reimbursement claims.

The CFO, in consultation with the legal team and relevant management, will determine what steps will be taken to investigate all reports of Fraudulent Conduct.

All information relating to the investigation of Fraudulent Conduct will be treated as confidential. It will only be released when the investigation is complete and with the approval of the CEO, CFO or General Counsel. No restriction will apply to making information available to law enforcement or other regulatory authorities if this is required by law.

Pulsar Group has also adopted an Anti-Bribery Policy. Team Members should familiarise themselves with this policy and ensure they comply with that policy at all times.

Conflict of Interest

A conflict of interest arises when other interests of a Team Member (such as relatives or friends or other business or financial investments) conflict with Pulsar Group's ability to act with total objectivity with regard to Pulsar Group's interests.

Team Members have an obligation to avoid financial, business or other relationships which might be opposed to the interests of Pulsar Group or which may conflict with their responsibilities to Pulsar Group. Team Members should not do anything or make any decisions relating to the business or

interests of Pulsar Group where they are influenced by outside activities, financial or business interests or relationships with family or friends.

Improper Payments: Bribery and Corruption

Pulsar Group is committed to ensuring that all Team Members are aware of their responsibilities and obligations in relation to the giving and receiving of gifts and the making or receiving of direct or indirect payments in the conduct of Pulsar Group business.

Pulsar Group is committed to the prevention of bribery and corruption and expressly prohibits the:

- making of payments or payments in kind (gifts, favours, discounts, entertainment etc) to induce individuals to award business opportunities to Pulsar Group or to make a decision in Pulsar Group's favour,
- receipt of payments or payments in kind (gifts, favours, discounts, entertainment etc) by a Team Member where the acceptance of the payment or benefit might influence or appear to influence the conduct of the Team Member's duties or might lead the giver of the payment or gift to think that they are going to benefit in some way,
- offering of a bribe, kickback, inducement or illegal payment of any kind to or for the benefit of any government official (of any country) or any customer, supplier, or any other party in connection with the obtaining orders or favourable treatment of any kind for Pulsar Group; and
- acceptance by any Team Member of a bribe, kickback, inducement or illegal payment of any kind.

Pulsar Group has adopted an Anti-Bribery Policy. Team Members should familiarise themselves with this policy and ensure they comply with that policy at all times.

Giving and Receiving Gifts and Entertainment

Pulsar Group recognises that it is accepted business practice that entertainment and small tokens such as cards and small gifts may be extended to customers and other third parties with whom Pulsar Group has a relationship at certain times. It is also accepted practice that Team Members may provide or accept meals, refreshments or entertainment appropriate to the circumstances in connection with business relationships. Team Members must exercise the utmost care in all such situations to ensure that the gifts or entertainment is modest, reasonable in the circumstances and for a proper purpose. Team Members must not offer gifts that could imply that they could gain a benefit for themselves or for Pulsar Group.

Pulsar Group has adopted an Anti-Bribery Policy which provides more detail on gifts and entertainment. Team Members must familiarise themselves with this policy and ensure they comply with that policy at all times.

Competition and Fair Trading Law Compliance

Pulsar Group is committed to compliance with applicable competition and fair trading law in all locations in which it conducts business.

Team Members are prohibited from engaging in business behaviour which is in breach of competition law (ie has the effect of preventing restricting or distorting competition (eg price fixing) or is in, or could be, in breach of fair trading law (ie engaging in misleading or deceptive conduct or making misrepresentations regarding Pulsar Group).

Whilst Pulsar Group acknowledges that an understanding of the market, and therefore its competitors, is essential in undertaking business, gathering this information must be done legally and ethically. Information must not be gained through unlawful or deceitful means.

External Communication

To ensure all communications are managed effectively and lawfully all public or external communications regarding the operations, business or financial performance of the Pulsar Group must be authorised expressly by the CEO. In no circumstances should a Team Member make any announcements regarding Pulsar Group operations, business or financial performance other than with express authorisation of the CEO. This does not apply to general marketing or promotion of the business or services of the Pulsar Group.

COMPLIANCE WITH THIS CODE

Pulsar Group requires all Pulsar Group Team Members to comply with this Code.

When it is considered that a breach of this Code has occurred, the nature of any disciplinary action in relation to the breach will be determined by relevant management in consultation with other appropriate sources of advice, for example People & Culture or the Legal Team.

Any material breaches of this Code will be notified to the CEO and where applicable the Pulsar Group Board of Directors.

Where breaches are considered to be of particular serious nature penalties may be imposed ranging from compulsory counselling to dismissal. If the situation involves a breach of the law the matter may be referred to the appropriate law enforcement authority.

Changes to this Policy

This Policy does not form part of any contract of employment or other contract to provide services. The Group reserves the right to update this Policy at any time and we will draw your attention to any substantial updates as soon as practicable.


Other relevant documents

The Code of Conduct is supported by a number of other policies and strategies, including:

- Code of Conduct
- Healthy Ways of Working at Pulsar Group
- Diversity, Equality + Inclusion
- Working with Respect Policy
- Anti-Slavery Policy
- Anti-Bribery Policy
- Anti-Tax Evasion Policy
- Whistleblowing Policy
- Information Security Policy
- Quality Management Policy
- Privacy Policy
- Internal Privacy Policy
- Supplier Code of Conduct

Document control information

This is a controlled document. All comments or requests for changes to this document should be addressed to the document owners.

OWNER/S	Jacquie Shanahan General Counsel and Company Secretary
APPROVED BY	Mark Fautley Global CFO  699D2FDC0288475...
EFFECTIVE DATE	25/4/2025