



WORKING WITH THIRD PARTIES POLICY

Contents

- 3 ABOUT US
- 3 SELECTING THE RIGHT SUPPLIERS
- 4 WORKING WITH THIRD PARTIES
- 10 REPORTING SUSPECTED VIOLATIONS
- 11 WHERE TO TURN FOR HELP

ABOUT US

PARKTEL USA has decades of experience in the wireless industry and in markets all over the world as a premiere mobile distributor. Our mission is to constantly work to support our companies as well as our vendors and third parties overall growth.

SELECTING THE RIGHT SUPPLIERS

PARKTEL USA requires that all Third Parties with whom it carries out business apply ethical principles that are consistent with its own. Business partners include joint venture or equity partners, acquisition targets, service providers, suppliers, vendors, consultants, subconsultants, contractors, subcontractors, or any other person acting on the Corporation's behalf (such as agents, representatives or sponsors) and their employees or other persons working on their behalf. Specific considerations may arise depending on the type and location of a third party with whom the Corporation is conducting business. In addition, the Corporation's Sanctions Compliance Policy sets out considerations surrounding the level of integrity review required on third parties where a project is linked to a country, territory or region with higher sanctions, corruption, or money laundering risk

How our Third Parties act can have a direct impact on us meeting our priorities. It is important to manage our relationships with them well, including the way we choose, contract and monitor them.

Selecting suppliers that can ensure a continuous supply of materials of the appropriate quality is critical, as is controlling the conditions in which products are transported. Maintaining optimal and efficient supply chains is particularly important because changing suppliers can be complex, slow and expensive.

WORKING WITH THIRD PARTIES

Scope

At PARKTEL USA, we are committed to operating to the highest ethical standards to help maximize the long-term sustainability of our business. We aim to comply with all laws, rules and regulations governing our activities and, in addition, have developed a comprehensive framework of PARKTEL USA policies, guidelines and standard operating procedures to help drive high ethical standards.

Proper due diligence procedures enable PARKTEL USA to follow through on its commitment to act with integrity by protecting against partnering with companies and individuals that do not operate pursuant to ethical principles. Such procedures also minimize reputational and legal risks arising from international sanctions, anticorruption, anti-money laundering and modern slavery legislation, by investigating potential business partners' past and current ethical standing.

Foundation

PARKTEL USA is committed to operating to the highest ethical standards to help maximize the long-term sustainability of our business and of the communities in which we operate. We will only work with Third Parties who share our approach. As a Responsible and Ethical organization with global outreach, often exercising substantial influence over those with whom we conduct business, PARKTEL USA acknowledges that we have an important role to play in driving best practice in key areas such as human rights, environmental protection, anti-bribery and corruption.

PARKTEL USA expects all Third Parties with whom we engage to comply with all applicable laws and regulations and to adopt, at a minimum, PARKTEL USA's Anti-Bribery & Corruption and Labor Rights Principles.

In addition to meeting PARKTEL USA's Anti-Bribery & Corruption and Labor Rights standards, where relevant, we expect Third Parties to comply with our standards on quality, health and safety and the environment. All expectations will be formalized in contracts and subject to appropriate levels of audit and oversight. Appropriate action will be taken against those Third Parties found in breach of

their undertakings, up to and including termination of their contract with PARKTEL USA.

The behavioral expectations we set for Third Parties are matched by those we set for our staff, reflected in our own employee Code of Conduct and Business Ethics.

Working Environment

PARKTEL USA encourages all Third Parties with whom we work to establish a culture which supports reporting of suspected violations of law, rules and regulations, as well as of unethical conduct. Specifically, Third Parties are encouraged to:

Enable their staff to report concerns or illegal activities in the workplace through formal reporting structures. These concerns should in turn be investigated, and if needed, corrective action should be taken.

Create an environment where staff concerns may be reported without fear of reprisal or retaliation. PARKTEL USA may take action, in accordance with local laws, against any Third Party who threatens, or engages in retaliation or harassment of any person who has reported, or is considering reporting, a concern in good faith.

Non-Retaliatory Engagement

All employees of Third Parties are encouraged to report suspected violations of law, rules and regulations related to their work with PARKTEL USA, including fraud, either through their own internal reporting channels or through PARKTEL USA's Integrity Lines. This includes reporting misconduct by PARKTEL USA staff (including contingency workers) with whom they do business. PARKTEL USA is committed to non-retaliation and will maintain, as appropriate, confidentiality and anonymity with respect to all disclosures.

Expectations for Employees and Representatives

PARKTEL USA has its own employee Code of Conduct and Business Ethics setting out the fundamental standards to be followed by PARKTEL USA employees, representatives and associates in their everyday interactions on behalf of the company, including engagement with Third Parties. The Code of

Conduct and Business Ethics covers a range of key behaviors expected of our staff but the following standards relating to conflicts of interest and acceptance of entertainment and gifts by PARKTEL USA staff are particularly relevant to our work with Third Parties.

- **Conflicts of Interest:** PARKTEL USA expects all staff to be free from actual or potential conflicts of interest. A conflict of interest occurs whenever the prospect of direct or indirect personal gain may influence or appear to influence their judgment or actions while conducting PARKTEL USA business.
- **Acceptance of Entertainment & Gifts:** Conducting business may involve occasional business-related entertainment or exchanges of gifts of nominal value. PARKTEL USA guidelines, found in PARKTEL USA Gifts, Entertainment and Hospitality Policy, provide standards and limitations governing the acceptance of entertainment and gifts from any person, organization, or agency related to, or associated with, PARKTEL USA's business activities.

Commitment

PARKTEL USA acknowledges the importance of working with Third Parties who share our values and operate in a responsible and ethical manner; of exercising our significant influence over those Third Parties with whom we conduct business in an appropriate way; and of working with Third Parties in helping them to meet our standards.

Anti-Corruption and Bribery

PARKTEL USA has a zero-tolerance approach to bribery and corruption and expect all Third Parties with whom we work to act with absolute business integrity and in compliance with all relevant international and domestic legislation. To this end, Third Parties will not, directly or indirectly, promise, offer, make, authorize, solicit or accept any financial or other advantage, to or from anyone to obtain or retain business or secure an improper advantage in the conduct of business. This rule applies regardless of whether they are government officials or work in a private sector entity. Financial or other advantage covers anything of value, including cash, gifts, services, job offers, loans, travel expenses, entertainment or hospitality. For the avoidance of doubt, PARKTEL USA forbids all facilitation

payments. These are unofficial, improper, small payments or gifts made to secure or expedite a routine action to which the payer is legally entitled. For further insight into PARKTEL USA's own approach to managing bribery and corruption see our Anti Corruption policy.

Ethical Business Practices

Third Parties will conduct their business consistent with all applicable anti-trust laws. They will strictly adhere to the letter and spirit of competition laws in all jurisdictions and will employ fair business practices including accurate and truthful advertising.

Workplace

Third parties shall be committed to uphold the human rights of workers and to treat them with dignity and respect, in line with the UN Guiding Principles on Business and Human Rights. Third parties are expected to meet the following labor rights principles and foster compliance with them by their own suppliers:

- **Freely Chosen Employment:** No use of forced, bonded, indentured or involuntary prison labor. Workers should not pay for a job or have their freedom of movement denied.
- **Child Labor and Young Workers:** No use of child labor. The employment of workers below the age of 18 only occurs in non-hazardous work and when young workers are above a country's legal age for employment, or the age established for completing compulsory education.
- **Non-Discrimination:** Provide a workplace free from discrimination. Workers do not face discrimination on any grounds (including but not limited to race, color, ethnic or national origin, age, gender, sexual orientation, disability, religion, political affiliation, union membership, pregnancy or marital status).
- **Fair Treatment:** Provide a workplace free of harassment, harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers and no threat of any such treatment.
- **Wages, Benefits and Working Hours:** Comply with applicable wage laws, including minimum wages, overtime hours and mandated benefits. Third parties communicate, in a timely manner, with the worker the basis on which

they are being compensated, whether overtime is required and the wages to be paid for such overtime. Overtime is voluntary and in line with national and international standards.

- **Freedom of Association and Collective Bargaining:** Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged. Workers' rights, as set forth in local laws, to freely join or not join labor unions, seek representation and join workers' councils are respected. Workers can communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

Compliance with Laws and Regulations

Information

Information is one of our most valuable assets and we are committed to safeguarding PARKTEL USA information, and all information entrusted to us. Our Third Party partners will therefore, at all times, be expected to safeguard proprietary, confidential and personal information related to their work with PARKTEL USA.

External Communications: Third Parties will never communicate externally about PARKTEL USA's prospects, performance or internal policies nor disclose inside information which could affect the price of PARKTEL USA securities without proper authority. They will also be forbidden from making any public posting of confidential or proprietary information related to any aspect of PARKTEL USA's business.

Information Management: Third Parties will protect the confidentiality, integrity and availability of PARKTEL USA information which they manage, store, transmit, or otherwise process. They will ensure this by implementing appropriate safeguards including policies, procedures, physical security and computer security controls.

Personal Information: Third Parties will protect the confidentiality and security of any Personally Identifiable Information they access or generate while working with PARKTEL USA by ensuring implementation of appropriate safeguards and complying with applicable legislation. Use and disclosure of Personally Identifiable Information will be limited to those purposes for which it was received to ensure that individuals' privacy rights are protected.

Health and Safety

Ensuring that our staff and Third Party employees with whom we partner stay safe, healthy and productive is a priority for PARKTEL USA. We therefore expect our Third Party partners to build healthy, high performing and safe working environments by:

- Providing a safe workplace and taking steps to ensure the physical and mental well-being of workers.
- Ensuring compliance with all relevant health and safety and environmental laws, regulations, permits, licenses, information registrations and restrictions.
- Implementing an environment, health and safety risk management process with clearly defined accountabilities for maintaining it.
- Providing sufficient resources, training, physical infrastructure and engineering controls necessary to protect people, the environment and local communities from harm.
- Minimizing and seeking to reduce exposure of workers and communities to hazardous physical, chemical and biological agents under normal, abnormal and emergency operating conditions.
- Providing relevant information, education and training to workers so they can understand the hazards, risks and control measures associated with their job. Identifying and practicing responses to a range of foreseeable emergencies based on the hazards and risks associated with operations.
- Ensuring early detection of fire, safe evacuation of people, and prompt action to minimize damage to the local environment and communities.

Environmental Protection

We are committed to reducing the environmental impact of our operations and our products. This commitment extends beyond our direct operations to include our entire supply chain, which is why we work closely with Third Parties on identifying ways we can reduce our collective environmental impact.

Third Parties are critical partners in achieving our sustainability goals and effective collaboration is central to that success. We therefore expect our Third Party partners to:

- Operate in an environmentally responsible way: conserving natural and other resources (carbon, forests, fresh water, etc.) and minimizing their impact on the surrounding communities, local and global environments.
- Operate in a transparent way: disclosing data requested by PARKTEL USA relating to all aspects of environment and using continuous improvement techniques to support PARKTEL USA's value chain environmental goals.
- Ensure the safe management of materials and waste: appropriately reducing, managing, controlling and treating prior to release into the environment any waste, wastewater or emissions with the potential to adversely impact human health or the environment.

Sanctions and Export Controls

Third Parties engaged in business on behalf of PARKTEL USA must understand and conduct their business in full compliance with all applicable sanctions and export control laws and regulations, including but not limited to compliance with restrictions on the movement of funds, products, goods, materials, services, software, and technology governed by those laws

REPORTING SUSPECTED VIOLATIONS

Employees or representatives with information on potential non-compliant conduct of PARKTEL USA, its employees, or any third party with whom PARKTEL USA conducts or anticipates conducting business must report the situation to the CEO or Compliance Officer.

WHERE TO TURN FOR HELP

If in doubt about any aspect of this policy, Employees may contact PARKTEL USA CEO or the Compliance Officer. Their contact information is available on the Corporation's intranet site.

Type of document	Governing policy	Related policy	Anti Corruption Policy
Version	1	Issuance date	
Owner	Approval date	Approver	Approval date
Jose M Doporto, Financial & Compliance Officer		Ethics Committe	
Previous versions approval references			