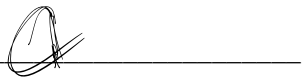
CODE OF CONDUCT AND COMPLAINTS PROCEDURE

Ofcom General Conditions Compliant – MVNO Regulatory Version

Effective Date: 19 October 2026
Version: 2.2 (replaces version 2.1 of 16 February 2026)
Septoo Limited, company no. 14752958
Building 2 First Floor, Croxley Business Park, Watford, Hertfordshire, WD18 8YA
Brands covered: Celtic Mobile, Hibs Connect and Rovers Connect
Powered by Acqua Telecom and Septoo

BOARD APPROVAL

This policy has been reviewed and approved by the Board of Directors of Septoo Limited and is effective as of the date stated above.

Signed: 

Name: Renato Andre de Andrade Reis
Title: Director
Date: 19 October 2026

1. Regulatory Framework and Legal Compliance

Septoo Limited ("the Company") operates as a Mobile Virtual Network Operator (MVNO) under the Communications Act 2003 and is subject to Ofcom's General Conditions of Entitlement. This policy applies to the mobile services the Company provides under the Celtic Mobile, Hibs Connect and Rovers Connect brands.

This policy ensures compliance with the following (non-exhaustive):

- Ofcom General Conditions C1–C10.
- Consumer Rights Act 2015.
- UK GDPR and Data Protection Act 2018.
- Privacy and Electronic Communications Regulations (PECR).
- UK Bribery Act 2010.
- Competition Act 1998.

2. Host Network Operator Disclosure (MVNO Responsibility)

The Company operates using wholesale radio access services provided by BT (including EE network infrastructure). Notwithstanding this arrangement, the Company retains full responsibility for: billing accuracy, customer service, complaint handling, regulatory compliance, data protection, and adherence to Ofcom General Conditions.

Service coverage and performance are dependent on the host MNO infrastructure. Any material service limitations will be transparently disclosed to customers.

3. SIM and eSIM Provisioning (GSMA Compliant)

The Company provides both physical SIM (pSIM) and embedded SIM (eSIM) services in line with GSMA standards.

eSIM activation credentials are securely generated and delivered. Identity verification and anti-fraud checks are conducted where required under UK law.

4. Roaming and Spend Protection

Roaming services are delivered in accordance with Ofcom transparency obligations.

- Clear disclosure of roaming charges and destinations.

- Spend caps and usage alerts where applicable.
- Fair Usage Policy published and accessible to customers.

5. Wholesale and Interconnection Policy

Where wholesale telecommunications services are provided, the Company ensures fair, reasonable, and non-discriminatory access consistent with competition law.

Wholesale agreements include defined SLAs, data protection provisions, and regulatory obligations.

6. Data Protection and Security

Personal data is processed lawfully, fairly, and transparently under UK GDPR. Septoo Limited is the data controller for customers of Celtic Mobile, Hibs Connect and Rovers Connect.

Reportable data breaches are notified to the Information Commissioner's Office (ICO) within statutory timeframes.

CUSTOMER COMPLAINTS PROCEDURE (Ofcom Compliant)

1. How to Make a Complaint

You can complain about any of our brands (Celtic Mobile, Hibs Connect or Rovers Connect) by email, by WhatsApp message or by post:

- Email: complaints@septoo.com
- WhatsApp (messages only): +44 7486 974846, wa.me/447486974846, or the WhatsApp button on our websites
- Post: Complaints, Septoo Limited, Building 2 First Floor, Croxley Business Park, Watford, Hertfordshire, WD18 8YA
- Websites: celticmobile.co.uk, hibsconnect.com, roversconnect.com

2. Complaint Handling Timelines (General Condition C4)

- Acknowledgement within 2 working days.
- Full response within 10 working days where possible.
- Escalation to Senior Management if unresolved.
- Deadlock letter issued if complaint cannot be resolved.

3. Alternative Dispute Resolution (ADR)

If a complaint remains unresolved after 8 weeks, or upon issuance of a deadlock letter, customers may refer the dispute to the Company's ADR scheme:

CISAS (Communications & Internet Services Adjudication Scheme), **Centre for Effective Dispute Resolution,** 100 St. Paul's Churchyard, London, EC4M 8BU

The Company cooperates fully with ADR determinations in accordance with Ofcom requirements.

4. Vulnerable Customer Policy

The Company maintains additional safeguards for vulnerable customers in line with Ofcom guidance.

5. Record Keeping and Audit

All complaints are logged and retained for regulatory inspection and compliance review.

ANNEX A – SERVICE LEVEL AGREEMENTS (SLA)

Retail Services:

- Target network availability: 99%+ subject to host MNO infrastructure.
- SIM activation: Within agreed onboarding timelines.
- Complaint handling: As per Section above.

Wholesale Services:

- Defined provisioning timelines per agreement.
- Fault response within agreed escalation windows.
- Regulatory compliance obligations embedded in contracts.