



**mobileum**

Action driven by intelligence

# Code of Conduct

## **EMPLOYEES AND DIRECTORS**

### Preface

Mobileum and its subsidiaries and affiliates ("Mobileum") commit to the highest level of integrity and ethical conduct for the foundation of our operations and management. To this end, Mobileum expects its employees and directors to maintain the highest standards of business ethics; to treat people with dignity and respect; and to be familiar with and comply with all applicable laws.

All employees must comply with this Code of Conduct - Employees and Directors to ensure this commitment to ethics and integrity in business operations, protection of human rights, sustainability of the environment, and compliance with laws.

**Mike Salfity**

*Chief Executive Officer*

# Table of Contents

<b>Workplace</b>	3
How to Treat People	3
Equal Opportunity Employment	3
Freedom of Association and Collective Bargaining	3
Diversity, Equity & Inclusion	4
Non-harassment	4
Workplace	4
Health and Safety	5
Security in workplace	5
Confidentiality	5
Working under influence of Substances	5
Concerns	6
Non Retaliation Policy	6
 <b>Business Practices</b>	 7
International Positioning and Laws	7
Data Privacy and Security	7
Trade Compliance	7
Recordkeeping	7
Third Party Relationships	7
Conflicts of Interest	7
Anti-Bribery, Anti-Corruption, and Antitrust	8
• Anti-Bribery	8
• Anti-Corruption	8
• Antitrust	8
Gifts & Entertainment	8
• Giving Gifts & Entertainment	8
 <b>Corporate Social Responsibility</b>	 9
Environmental, Social, Governance (ESG) Framework	9
Environmental	9
Social	9
• Modern Slavery	9
• Child/Exploited Labor	9
• Conflict Minerals	9
Governance	9



# Workplace

## How to Treat People

Treating employees, contactors, customers, vendors, and other third parties with whom we interact with respect is a cornerstone of Mobileum's company culture. Treating someone with respect means behaving in such a way in interactions with other people that values the worth, dignity, and trust of that party.

Valuing the worth of other people means extending understanding and tempered interactions with others despite differences in values, beliefs, and/or opinions.

Treating people with respect and dignity means, at minimum, providing an environment free of harassment, discrimination, and bullying.

Harassment, bullying, and discrimination take many forms, including but not limited to:

- Unwelcome remarks, gestures, or physical contact.
- The display or circulation of offensive, derogatory or sexually explicit pictures or other materials, including by email, instant messaging and on the Internet.
- Offensive or derogatory jokes or comments (explicit or by innuendo).
- Verbal or physical abuse or threats.

Extending trust means all employees are expected to protect information and data in that employee's care, custody, or control. Employees receive varying grades of protected information every day. This information must be protected in accordance with corporate policies, processes, and governing laws.

Our customers, vendors, and other employees trust us to provide competent, safe, and honest interactions. Mobileum expects all employees, directors, and contractors to act accordingly.

## Equal Opportunity Employment

Mobileum provides equal employment opportunities to all employees and applicants for employment without regard to race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, genetic information, marital status, amnesty, or status as a covered veteran in accordance with applicable federal, state, and local laws.

Mobileum complies with applicable state and local laws governing nondiscrimination in employment in every location in which the company has facilities. This policy applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, recall, and transfer, leaves of absence, compensation, and training.

Employees who engage with the public as part of their job duties are required to do so in a respectful, non-discriminatory manner by respecting diversity and ensuring that members of the public are not subject to discrimination. Employees with issues or concerns regarding discrimination or who feel they have been subjected to discrimination can contact Human Resources or the Whistleblower Hotline.

## Freedom of Association and Collective Bargaining

Mobileum recognizes the right of its employees to freedom of association and collective bargaining.

## Diversity, Equity & Inclusion

At Mobileum we believe that diversity, equity, and inclusivity is based on psychological safety and therefore promotes an environment of openness, where everyone's unique abilities and differences are perceived as a true strength for the company to be successful.

We embrace diversity of background, culture, experience, and perspective. We maintain a culture of transparency regarding processes like internal hiring, and rewarding performance and we hire based solely on job-related criteria.

Mobileum will endeavor to provide reasonable accommodations to the known physical or mental limitations of qualified employees with disabilities unless the accommodation would impose an undue hardship on the operation of our business.

Mobileum will endeavor to accommodate the sincere religious beliefs of its employees to the extent such accommodation does not pose an undue hardship on the Mobileum's operations. If you wish to request accommodation, please speak to Human Resources.

## Non-harassment

It is Mobileum's policy to prohibit intentional and unintentional harassment of any individual by another person based on any protected classification including, but not limited to, race, color, national origin, disability, religion, marital status, veteran status, sexual orientation, or age.

The purpose of this policy is not to regulate our employees' personal morality, but to ensure that in the workplace, no one harasses another individual.

It is Mobileum's policy to prohibit harassment of any employee by any manager, employee, customer, or vendor based on sex or gender. While it is not easy to define precisely what types of conduct could constitute sexual harassment and there is a wide range of behavior that may violate this policy even if such behavior does not violate the law.

Depending upon the circumstances, improper conduct also can include inappropriate joking, vulgar or offensive conversation or jokes, commenting about an employee's physical appearance, conversation about your own or someone else's sex life, or teasing or other conduct directed toward a person which is sufficiently severe or pervasive to create an unprofessional and hostile working environment.

## Workplace

At Mobileum we want to make sure we maintain a positive work environment. Each employee plays a role in fostering this environment so we all must abide by certain rules of conduct based on honesty, common sense, and fair play. The following are examples of some, but not all, conduct which can be considered unacceptable:

- Obtaining employment based on illegal, false, or misleading information.
- Stealing or removing Mobileum or third-party property.
- Disclosure of confidential or protected information.
- Falsifying documents.
- Violation of safety rules.
- Fighting, threatening, harassing, discriminating, or disrupting the work of others.
- Failure to follow lawful instructions of a manager or supervisor.
- Failure to perform assigned job duties and/or unsatisfactory job performance.
- Willful or careless destruction or damage to Mobileum assets or to the equipment or possessions of third parties.
- Violation of any Mobileum policy.

Not every type of misconduct can be listed, and in the event of unacceptable conduct Mobileum may subject the offender to disciplinary action, up to and including discharge.





## Health and Safety

The health and safety of employees and others on Mobileum property is critical to us. Mobileum complies with all health and safety laws applicable to our business and to all regulations within the locations we are based on.

We rely upon employees to ensure that work areas are kept safe and free of hazardous conditions, and we expect employees to follow all safety rules and practices, take necessary steps to protect themselves and others, attend required health and safety training and report all accidents, injuries, and unsafe practices immediately.

Any perceived or actual risk on Mobileum's premises, or in a product, facility, piece of equipment, process, or business practice for which Mobileum could be responsible should be brought to the attention of management immediately.

Periodically, Mobileum will organize specific training and may also issue additional rules and guidelines governing workplace safety and health. Employees are expected to complete the required training and understand and follow the related rules and regulations.

Any workplace injury, accident, or illness must be reported to the employee's manager and to Human Resources as soon as possible, regardless of the severity of the injury or accident and will be handled in accordance with local laws and guidelines.

## Security in workplace

Mobileum believes the security of its employees and guests is critical, and we are committed to preventing workplace violence and maintaining a safe work environment.

Mobileum has adopted the following guidelines to deal with intimidation, harassment, or other threats of (or actual) violence that may occur:

- All employees, temporary workers, and contractors should always be treated with courtesy and respect. Employees are expected to refrain from physical contact, such as fighting or other conduct that may be dangerous or offensive to others.
- Firearms, weapons, and other dangerous or hazardous devices or substances are prohibited from the premises of the Company.
- Conduct that threatens, intimidates, or coerces another employee, a customer, partner, or vendor will not be tolerated. This prohibition includes all acts of harassment, including harassment that is based on an individual's sex, race, national origin, protected disability, religion, age, genetic information, or any other characteristics.

- Any actual or threatened violence, both direct and indirect, should be reported immediately to your manager, Human Resources or through the Whistleblower Hotline.
- Mobileum will promptly and thoroughly investigate all reports of actual or threatened violence and of suspicious individuals or activities.
- Anyone determined to be responsible for actual or threatened violence or other conduct that is in violation of these guidelines will be subject to disciplinary action up to and including termination of employment.
- If there is a threat of serious, immediate harm, please contact the local authorities.

## Confidentiality

Mobileum considers compliance with applicable privacy laws to be of the utmost importance and has established internal controls surrounding the collection, use, disclosure, retention, and disposal of information. Employees are afforded the highest level of trust and confidence in execution of duties and will protect all confidential, protected, and proprietary data in accordance with all policies and processes and will take all reasonable precautions to protect information.

## Working under the influence of Substances

To help ensure a safe, healthy, and productive work environment for our employees and others, and to protect Mobileum property and ensure efficient operations, it is forbidden to work under the influence of alcohol or non-prescription drugs. Mobileum maintains a workplace free of substance abuse.

The abuse, solicitation, theft, possession, transfer, purchase, sale, or distribution of controlled substances, including drug paraphernalia or alcohol is prohibited.

Mobileum maintains a policy of non-discrimination and will endeavor to make reasonable accommodations to assist individuals recovering from substance and alcohol dependencies, and those who have a medical history which reflects treatment for substance abuse conditions. However, employees may not request accommodation to avoid discipline for a policy violation.

We encourage employees to seek assistance before their substance abuse or alcohol misuse renders them unable to perform the essential functions of their jobs or jeopardizes the health and safety of any Mobileum employee, including themselves.

## Concerns

If an employee feels they have been subjected to conduct which violates this policy, they should immediately report the matter to their manager, Human Resources, or through the Whistleblower Hotline available here:

<https://report.syntrio.com/mobileum>

If the employee is unable for any reason to contact these people, or if the employee has not received a satisfactory response within five (5) business days after reporting any incident of what the employee perceives to be harassment, the employee should contact the Human Resources or Compliance.

Every report will be fully investigated, and corrective action will be taken where appropriate. All employees must cooperate with all investigations. All complaints will be treated with the utmost confidentiality as far as the law allows. In addition, Mobileum has a strict non-retaliation policy. It will not allow any form of retaliation against individuals who report unethical or illegal conduct or who cooperate in the investigations of such reports.

If an employee feels they have been subjected to any such retaliation, the employee should report it in the same manner as set forth above.

## Non Retaliation Policy

Mobileum is committed to providing a workplace conducive to open discussion of its business practices. It is our policy to protect employees who make reports, in good faith, of potential violations of the policies or applicable law, as described herein.

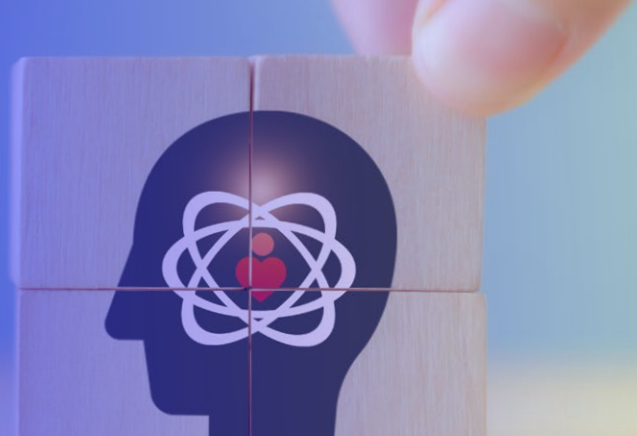
Additionally, it is our policy to comply with all applicable laws that protect employees against unlawful discrimination or retaliation by their employer because of their lawfully reporting information regarding corporate fraud or other violations of law by Mobileum or its employees.

Any employee who retaliates against another employee for reporting problems will be in violation of policy. If an employee believes that they have been subjected to any action that violates this Non-Retaliation Policy, they should notify their manager or Human Resources. See Whistleblower Policy for more information.

This Non-Retaliation Policy applies even if an allegation made in good faith turns out groundless. However, employees who file reports or provide evidence that they know to be false or without a good faith belief in the truth of such information will not be protected by the Non-Retaliation Policy and will be in violation of policy.



# Business Practices



## International Positioning and Laws

Business integrity means that we adhere to all applicable laws and regulations in all our geographies as well as to the ethical standards set forth by Mobileum. Being an international company subjects us to many overlapping regulations requiring deliberate effort and sustained commitment to excellence. Mobileum complies with international and local laws and expects its employees, vendors, contractors, suppliers, partners, agents, resellers and any third party with whom it does business to comply, as well.

## Data Privacy and Security

Mobileum commits to compliance with applicable data protection and privacy laws. We conduct necessary audits, implement strong protections, and consistently work to improve ourselves. One of our highest priorities is keeping data private, safe, and secure through technical, technological, administrative, and physical controls. Employees must comply with all policies and procedures surrounding the protection, privacy, and security of data.

## Trade Compliance

Mobileum employees commit to compliance with all applicable import and export control laws and regulations including sanctions, embargoes, and anti-boycott rules as set forth in Mobileum policies and procedures.

## Recordkeeping

Mobileum employees will create and maintain accurate books and records of transactions in compliance with all applicable laws, regulatory requirements, and policies. Records will be retained and destroyed in accordance with the respective policy and schedules.

## Third Party Relationships

Championing integrity is only meaningful if you do business with people of integrity. To this end, Mobileum requires that any third party with whom it does business maintain a solid ethical foundation by complying with the [Partner Code of Conduct](#).

## Conflicts of Interest

As a company that values honesty, integrity, and equality of opportunities, Mobileum employees must avoid situations where their personal interests conflict, or appear to conflict, with those of Mobileum's.

An employee may be considered to have a Conflict of Interest whenever they or their relative has an existing, perceived, or potential financial or other material interest that impairs or might appear to impair their independence or objectivity in the discharge of their responsibilities to Mobileum.

Additionally, personal/familial and business relationships may cause "dual loyalties" that are unrelated to personal financial gain, but nonetheless may raise Conflict of Interest concerns.

This policy is not intended to prohibit the provision of modest courtesies, openly given, and accepted as part of the usual business amenities, for example, occasional business-related meals or promotional items of nominal or minor value to the extent allowed by law and reported through the Gift Disclosure tool located on the Compliance page.

You are responsible for reporting any actual or potential conflict between you (and your immediate family) and the Mobileum through the Conflict-of-Interest Reporting Tool on the Compliance Page.

## Anti-Bribery, Anti-Corruption, and Antitrust

Mobileum rejects all forms of corrupt business behavior, such as bribery (public, private, active, and passive), embezzlement, fraud, theft, and the granting of improper advantages.

### Anti-Bribery

Mobileum employees and its business partners are not allowed to give, promise to give, solicit, or accept any form of improper advantage, whether directly or indirectly, to or from any individual or organization with the intention to obtain or retain business in return. Improper advantages include illegal rebates, bribes, kickbacks, and under-the-table payments. An improper advantage can be anything of value, including payments, meals, gifts, entertainment, travel expenses, or fake agreements.

### Anti-Corruption

Holding ourselves to the high ethical standards, Mobileum maintains appropriate controls to prevent against and detect fraud, money laundering, terrorist financing or tax evasion. Mobileum employees or any third party with whom Mobileum engages will not engage in corruption or financial crimes nor attempt to circumvent any controls.

### Antitrust

Mobileum employees cannot collude with competitors to set prices, rig bids, allocate markets, engage in group boycotts, and share or gather confidential competitive information. Employees cannot work with resellers, distributors or partners in a way that restricts or restrains fair competition.

Mobileum will charge fair prices for its products so as not to manipulate markets, restrict fair competition or discriminate against customers.

## Gifts & Entertainment

Mobileum expects employees to always act fairly and with integrity. Even when gifts or entertainment are exchanged out of the purest motives of personal or professional friendship, they can be misunderstood and perceived as an improper advantage. A gift or favor should not be accepted or given if it might create a sense of obligation, compromise your professional judgment, or create the appearance of doing so.

### Giving Gifts & Entertainment

- Gifts or entertainment may be given only where appropriate and where there is no risk of creating the perception of influencing the recipient in decision making.
- Gifts must be of minimal value and entertainment must not go beyond what is reasonable. Lavish or inappropriate gifts or entertainment are prohibited.
- Demanding or soliciting gifts or entertainment of any kind is prohibited. This includes not only items but advantages that carry value.
- Unsolicited gifts or entertainment may only be accepted if they do not go beyond common courtesy and are an accepted local business practice.
- Offers of entertainment may only be accepted if they arise out of the normal course of business, cannot be seen as lavish and take place in settings that are appropriate.
- Employees cannot give any gifts to government employees.
- Any provision or receipt of gifts must comply with the thresholds set forth in the respective policies.



# Corporate Social Responsibility

## Environmental, Social, Governance (ESG) Framework

Mobileum strives to provide its customers with the best products and services that enable them to do their job better, more efficiently and improve the overall community. This goal is only possible through the contribution of our remarkable employees.

### Environmental

Mobileum follows the principle that business should be ethical and fair environmentally, socially and from a governance perspective. We have chosen to operate in a transparent and environmentally friendly way. Mobileum's goal is to incorporate environmental awareness throughout our business. We recognize that this impacts not only our daily operations but our entire value chain. Mobileum seeks to maximize growth without negatively impacting the environment. Sustainability is always one of the key factors when choosing between alternatives and making decisions. Mobileum has initiated projects within the company to reduce our carbon footprint and minimize our impact on the environment.

### Social

#### Modern Slavery

Mobileum is committed to responsible business practices protecting human rights. We have a zero-tolerance approach to all forms of slavery and human trafficking ("modern slavery") in our organization and in the organizations with whom we work. We are focused on identifying, reporting, and addressing any human rights risks or abuse in our operations.

#### Child/Exploited Labor

Mobileum is committed to conducting business in a legal, ethical manner by adding value to society and the environment instead of doing harm. Helping stop child labor or forced labor by exploited individuals is fundamental to our company. We want to make sure that our organization does not take part in the exploitation of children, the impoverished, disadvantaged, or other groups lacking proper social protection.

#### Conflict Minerals

Mobileum does not manufacture its own products. However, Mobileum supports the humanitarian goal of ending the human rights violations in those areas which are believed to have been partially financed by the exploitation and trade of conflict minerals.

Mobileum commits to working with our suppliers to increase transparency regarding the origin of minerals contained in our products to prevent such exploitation. Mobileum expects all employees to respect and comply with policies addressing these horrible practices.

### Governance

We view good governance as essential to creating and preserving value for our employees and stakeholders. This includes a sound corporate governance approach that complies with all applicable laws, rules, regulations, and policies and unwavering adherence to our values.

All third parties with whom Mobileum works are expected to maintain the same ethical foundation.



Anyone may report known or suspected concerns anonymously to Mobileum's Ethics Hotline at <https://report.syntrio.com/mobileum>

We at Mobileum appreciate your continued support in doing the right thing.

This policy is also available on Mobileum Website.