



mobileum

Action driven by intelligence

Partner Code of Conduct

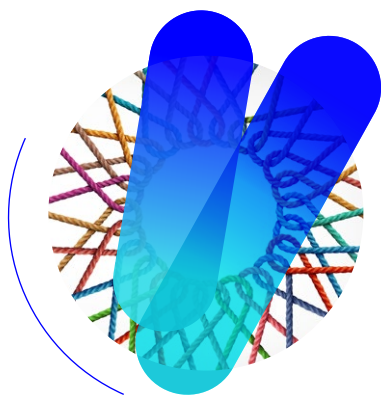
Commitment to the highest level of integrity and ethical conduct are the foundation for Mobileum operations and management. Critical to maintaining this commitment is developing and maintaining strong relationships with vendors, suppliers, contractors, resellers, agents, and partners ("Partners") who share this passion and dedication to doing the right thing.

Mobileum expects its Partner to maintain the highest standards of business ethics; to be familiar with and comply with all laws applicable to the relationship with Mobileum including extra-territorial laws that govern the conduct of Mobileum; and to keep up to date with all legal and regulatory changes relevant to operations by and among the parties. All Partners agree to comply with this Partner Code of Conduct ("Code") and further agree to ensure that their vendors, suppliers, agents, contractors, employees, and subcontractors ("Third Parties") comply to the same or higher standards.

We value our Partners who share 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



Business Integrity

All Mobileum Partners are expected to conduct themselves with the highest level of integrity and in compliance with all applicable laws, regulations, and this Code.

Bribery and Corruption

Partners must not offer, promise, give or receive bribes or any other form of inducement, regardless of the value, with the intention or appearance of influencing a business decision or securing an improper business advantage, whether directly or through a third party.

Partners shall implement adequate controls to prevent, detect, oversee, and audit employees or its suppliers and affiliates from committing offenses of bribery or corruption. The effectiveness of such controls should be reviewed and updated regularly to ensure that they are effective.

Gifts and Hospitality

The exchange of gifts and hospitality is often used to build normal business relationships. However, it can create an actual or perceived conflict of interest or an improper or unfair business advantage.

Partners must ensure that any offering or receipt of any gift or business hospitality does not violate any law and is consistent with reasonable market customs and practices. Extravagant or lavish gifts, meals, entertainment, or travel expenses, must not be given or accepted particularly where they are disproportionate, frequent, or provided in the context of ongoing business negotiations.

Conflict of Interest

Partners must ensure that they supply or provide goods and/or services to Mobileum openly and transparently. Any actual or perceived conflicts of interest must be disclosed immediately to Mobileum's Legal or Compliance Department.

Business records

Partners must create and maintain accurate books and records of transactions in compliance with all applicable laws and regulatory requirements. Appropriate accounting controls must be put in place and followed.

Financial crimes

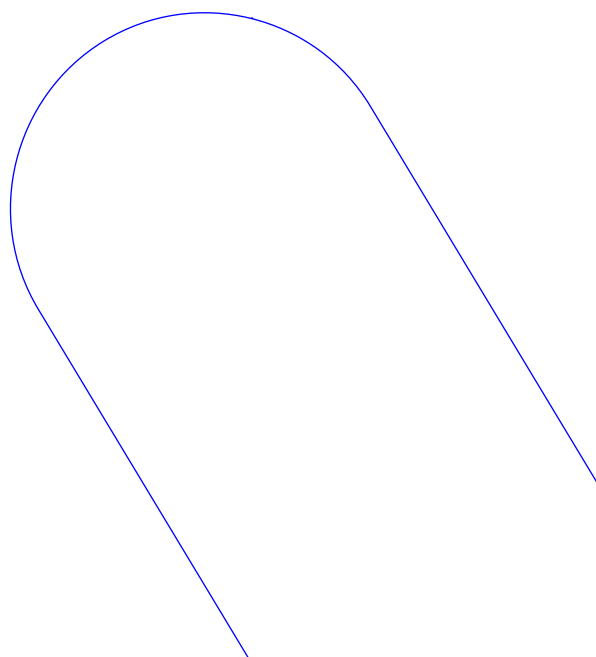
Partners will have appropriate controls to prevent against and detect fraud, money laundering, terrorist financing or tax evasion regarding its own operations or with third parties with whom it has contractual relationships.

Fair Competition and Antitrust

Partners will not propose or enter into any agreement with another company or potential supplier to fix prices, terms and conditions of sale, costs, profit margins or anything similarly prohibited by law. Partners will ensure its controls are adequate and able to detect violations.

Sanctions

Partners must comply with all applicable import and export control laws and regulations including sanctions, embargoes, and anti-boycott rules. Partners are expected to understand any sanctions, import, and export control requirements relating to their work, and ensure their operations comply with these requirements.





Workplace Standards

Mobileum is committed to ensuring that working conditions in our supply chain are safe, employees are treated with dignity and respect and that business operations are environmentally responsible.

Non-Discrimination

Partners will value diversity, equity, and inclusion in the workplace. Partners will not discriminate against their employees or candidates for employment based on any protected class including race, color, religion, national origin, gender, age, disability, pregnancy, political affiliation, union membership, veteran status, marital status, citizenship status, creed, sexual orientation or as otherwise provided by applicable laws.

Respectful Work Environment

Partners must be committed to a harassment-free workplace. Partners may not threaten or subject employees to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, or verbal abuse.

Slavery/Human Trafficking

Partners will not use forced or involuntary labor whether in the form of prison labor, slavery, bonded labor, or any other form of human trafficking. Partners shall not require any worker to surrender control over original identity documents or work permits. Employees should be allowed to freely terminate employment and enjoy freedom of movement. Partners will ensure it has adequate controls to ensure compliance with this requirement by it and its Third Parties. Partners may be audited for compliance with this provision.

Child Labor

Partners must comply with all applicable minimum age laws and requirements and will not employ any person under the age of 15, under the age for mandatory education, or under the minimum age for employment in the country - whichever age is highest.

Conflict Minerals

Partners will not source from companies manufacturing products containing tantalum, tin, tungsten, or gold derived from the Democratic Republic of the Congo and/or surrounding countries due to the human rights abuses involved in mining in these regions.

Working Hours

Partners' employee working hours will conform to local labor laws and will not be excessive. Partners' employees should be granted a minimum of at least one day off every seven-day period.

Wages and Benefits

Partners will fairly and competitively compensate their employees in compliance with applicable local and national wage and hours laws. Partners will not make deductions or withhold compensation from employee wages that are not agreed to in a signed contract and allowed under governing law.

Freedom of Association

Partners will not interfere with the legal rights of employees to associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining.

Health and Safety Practices

Health and safety are fundamental to all businesses. Partners must provide employees with a safe work environment consistent with all applicable laws and regulations including, but not limited to, implementing procedures and safeguards to prevent, manage, and track workplace hazards, work-related accidents, and injuries.

Environmental Practices

Partners should be committed to sustainable development and minimizing the negative impact of their operations on the environment including complying with all local environmental laws and regulations.



Compliance Infrastructure

Partners must have, and properly disseminate their own written code of ethics and business conduct that, at a minimum, incorporates the requirements of this Code of Conduct and the laws applicable to their business, including laws applicable to business with government officials and entities.

Partners shall maintain effective business controls that are capable of preventing and detecting unlawful conduct by their employees and Third Parties with whom Partners work which includes: i) a clear commitment to legal compliance, ethics, environmental, health and safety, labor programs and commercial practices; ii) a designated company representative responsible for overseeing and implementing compliance and ethics programs; and iii) clearly communicated mechanism for employees to report misconduct or known or suspected violations of law or policy without fear of reprisals.

Mobileum conducts due diligence and periodic monitoring of Partners to ensure compliance with this Code. As a condition precedent to doing business with Mobileum, Partners consent to such due diligence and monitoring. As Mobileum takes ethics and compliance with laws seriously, it reserves the right to terminate any related contracts with any Partner who fails or refuses to comply with this Code.

Partners and other stakeholders may report known or suspected concerns *anonymously* to Mobileum's Ethics Hotline at reports@syntrio.com (please include "Mobileum" in the report); or by phone:

In the United States +1.833.759.6363

Outside of the United States [[access code](#)] 800.603.2869.

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

