

CODE OF CONDUCT

Revision 1.0.2

Introduction

Aplicom's mission is to offer telematics products and services that improve the efficiency and safety of their users and reduce their environmental footprint.

In our day-to-day operations, we pursue our mission in accordance with our values and policies. We believe that long-term cooperation with our customers and partners, based on trust, openness and respect for each other, is the best way to conduct business.

We take responsibility for our customers, each other, the quality of our products and services, and our impact on the environment. These principles are clear in how we work.

Our Values

- Open and honest cooperation
- Accountability
- Competence
- Continuous improvement
- Achievement

We work openly and honestly with our colleagues and partners. This is how we build mutual trust, which is the foundation of our success.

We are accountable to our customers, our own operations, our colleagues, for the quality of our work, and for helping to take care of our environment.

Maintaining and developing our competence is part of our daily work.

We keep our goals firmly in mind and work hard to achieve them.

Principles of Employee Engagement

We expect all of our employees to believe and follow these guidelines:

- Customer satisfaction is extremely important to me
- I am a reliable part of our team, doing my job properly and helping others
- I am responsible for the quality of my own work
- An essential part of my work is good communication

Corporate Social Responsibility

Working conditions and rights

Aplicom affirms that all people should be treated with respect and dignity. We want to be a good employer, one that takes care of its staff and uses the suggestions and initiatives of its employees to improve working conditions and overall well-being at work.

Finnish legislation and collective agreements define comprehensive rules for the treatment and well-being of our employees in accordance with the principles of the Nordic welfare state. Finland's laws lay the foundation on which employment contracts, working hours, salaries, annual holidays and the work of young people are based.

We guarantee good working conditions and the fundamental rights of our staff by carefully following this legislation and, in addition, our generally binding collective agreements.

We systematically monitor the satisfaction of our employees and take their feedback into account, and consider staff suggestions and initiatives to improve working conditions.

We expect that our international subcontractors comply with international agreements and the basic principles of good working conditions and human rights. We do not do business with anyone who uses child labour or forced labour, underpays their employees, or engages in human trafficking of any kind.

We require that our partners and subsidiaries follow the same principles.

Harassment and fairness

We want Aplicom to be a good workplace, where all employees are treated fairly and respectfully. We have zero tolerance for all forms of harassment or discrimination, regardless of the reasons for it. This applies to both our staff at work and when recruiting new employees.

Every employee is duty bound to report any harassment or discrimination personally experienced or witnessed to their own manager or another manager (if their own manager seems to be involved). In such an instance, Aplicom management is obliged to intervene to stop the aforementioned harassment or discrimination, and to provide the person or persons affected with appropriate support and assistance.

We also require that our partners and subsidiaries follow the same principles.

Occupational health and safety

Finnish legislation and collective agreements define comprehensive rules for the health and safety of our personnel at work, in accordance with the principles of the Nordic welfare state.

The Finnish **Occupational Health Care Act** defines internationally unique practices for monitoring and managing the health of employees. These include medical examinations and other relevant services provided by an occupational health physician paid for by the employer. This ensures a good basic level of occupational health care. We follow these rules conscientiously.

The occupational health of our employees is guided by an up-to-date plan put together with our occupational health services partner.

Occupational safety in Finland is fully regulated. The Finnish **Occupational Safety Act** defines internationally high standards of occupational safety. Compliance with the provisions of the Act is monitored through mandatory external audits. We follow these regulations and any recommendations on the safety, working environment and ergonomics made by inspectors, and we quickly correct any deficiencies that may be found.

Occupational safety in Aplicom is supervised by an elected health and safety representative, chosen by colleagues from our staff.

We require that our partners and subsidiaries take care of their own staff in accordance with local regulations and good international practice.

Business ethics

Gifts and bribery

Our business activities are not based on illegal or otherwise inappropriate activities. In Aplicom, it is absolutely forbidden that any employee accept or offer benefits (financial or otherwise) if such an action is likely to undermine confidence in the fairness of our operations.

Therefore we do not accept or offer valuable gifts that may appear excessive or outside the bounds of reasonable hospitality in the ordinary course of business. We apply anti-corruption principles in all of our business activities.

Privacy policy

We comply with the privacy policy requirements of the Personal Data Act in all processing of personal data. We collect and process personal information only for the purposes of conducting our business.

Only people who have the right to handle data are authorized to process personal data in Aplicom. We comply with all due diligence required for the processing of personal data so that said data is only used in accordance with applicable law.

We comply with EU legislation, as defined by the GDPR Directive, for the storage and use of personal data.

The processing of confidential information

We process any confidential information we receive in a legal and ethical way. We have confidentiality agreements with our customers and business partners that define the manner in which we handle confidential information. We follow these agreements to the letter and train our staff to comply with their obligations.

All staff contracts contain a confidentiality clause to guide the handling of confidential information in the course of their work.

Fair competition and cartels

We comply with the competition and cartel laws of the European Union and the Finnish government.

We do not and will not enter into agreements with our competitors, suppliers or customers that violate these laws, and will not take advantage of a dominant market position over others under any circumstances.

Conflict of interest

Personal relationships or interests do not affect our decision making. Instead, we base our decisions on objective facts.

Copyright

We protect our own trademark rights and copyright at the level and manner we consider most appropriate, and we do not abuse the rights of others.

Export restrictions and financial sanctions

We adhere to export restrictions imposed by the European Union and the Finnish government, in accordance with applicable international treaties (including the Wassenaar Arrangement), and follow any further economic sanctions imposed under these agreements.

Financial reporting and accounting

Shareholders, customers, lenders, and other stakeholders trust that Aplicom will provide them with reliable information about the company's operations, results and future plans.

Our accounting and financial reporting is done in-house by qualified accountants and checked externally by licensed auditors. Our reports comply with applicable regulations and good governance so that they are correct and give a true picture of our operations and financial condition.

Environment

Environmental responsibility

Our core mission is partly based around reducing environmental impact.

In the same spirit, we endeavour to show our environmental responsibility in all our business activities and continuously develop our operations to lessen our influence on the environment. Our long-term goal is to make our business part of a sustainable circular economy that affects the environment as little as is reasonably possible.

We comply with environmental legislation and follow general good practice towards environmental issues.

By its very nature, our work does not adversely affect the environment. Instead, we work for the environment in simple everyday things.

We pay careful attention to our energy efficiency, strive to reduce the amount of waste we produce, and sort our waste for recycling as much as possible. We choose environmentally responsible subcontractors and monitor the impact of their work. We always take environmental factors into account when choosing components and manufacturing materials.

We use electronic communication to reduce travel and we prefer to use low emission vehicles.

We strive to meet the demands of environmentally conscious customers with regard to the materials used to make our products, and provide a report on it for them if so required.

Our environmental management system is certified according to ISO 14001.

Guidelines for subcontractors and suppliers

We ensure that our subcontractors and suppliers meet our requirements by providing them with strict project specifications and instructions they must follow when working with us.

Staff training

We have trained all our staff in the principles of good conduct with regard to corporate responsibility. We also include this training as part of our orientation program for new employees.