



CODE OF CONDUCT

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1. Introduction

Aplicom's mission is to offer telematics products and services that improve the efficiency and safety of users' operations 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.

2. 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 and 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.

3. 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.

4. Corporate Social Responsibility

We want to be a good employer, taking good care of our employees and listening to any suggestions our staff might offer to improve operations, working conditions and well-being at work.

We require our partners and subsidiaries to comply with the principles we outline in this document as well as local government regulations.

In addition, we also require our international subcontractors to comply with international agreements on working conditions and the basic principles of human rights.

4.1. Salaries, benefits and freedom of association

Finnish legislation and collective agreements comprehensively define our employees' working conditions, including the treatment of employees and well-being at work, in accordance with the principles of the Nordic welfare state. These provide a basis for employment contracts, working hours, and annual leave. We guarantee good working conditions and the fundamental rights of our employees by complying with these laws and agreements.

We guarantee our employees the right to organize and belong to trade unions in their own professional fields. We comply with the collective agreements negotiated by trade unions and employers' organisations which define minimum wages, and working time, and other guidelines.

If necessary, we may also agree on terms and conditions of employment locally, within the limits permitted by the collective agreements to which we are bound.

4.2. Young workers, child labour, forced labour and human trafficking

We comply with the laws and regulations concerning Finnish working life, as well as the collective agreements negotiated by trade unions and employers' associations, which define the principles and rules for the employment of young people.

Finnish legislation and collective agreements comprehensively define our employees' working conditions, including the treatment of employees and well-being at work, in accordance with the principles of the Nordic welfare state. Our legislation unequivocally prohibits forced labor, the use of child labor and trafficking in human beings and requires us to notify the authorities if we find any such practices in any form.

4.3. Harassment and non-discrimination

We want Aplicom to be a good workplace, where all employees are treated fairly and equally, and no one has to suffer discrimination or harassment.

We have zero tolerance for all forms of harassment and 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.

Related principles and intervention mechanisms are set out in more detail in the Annex to this document.

4.4. 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 occupational health and safety inspections carried out by occupational health care professionals. This ensures a good basic level of occupational health care. We follow these rules conscientiously.

The occupational health of our employees is guided by a regularly updated plan, provided by our occupational health services partner.

Occupational safety in Finland is fully regulated. The Finnish **Occupational Safety Act** defines internationally high standards for 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. We quickly correct any deficiencies that may be found.

The practice of occupational health and safety in Aplicom is monitored by the Occupational Health and Safety Committee. The Committee deals with issues related to well-being at work, and the occupational health and safety of employees, in close cooperation between the employees and their employer.

The duties and powers of the Occupational Health and Safety Committee are regulated by law (the law for occupational health and safety monitoring and workplace health and safety collaboration), which we conscientiously observe.

The Occupational Health and Safety Manager is both the chairman of the Occupational Health and Safety Committee and the employer's representative on the Committee. Other members of the committee are the Occupational Health and Safety Commissioner and Deputy Commissioners. Aplicom staff elect an occupational health and safety representative and deputy commissioners in an election held every two years.

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

4.5. Initiatives and development proposals

We expect our staff to be active in developing company operations.

Using feedback, we want to encourage the continuous development of our operations and ensure that any identified shortcomings are rectified and followed up appropriately. Initiatives and development proposals are one low-threshold channel through which employees can communicate their ideas to company management.

Development suggestions can be submitted via email to supervisors, or to the Aplicom electronic feedback box, which also allows for anonymous feedback.

Feedback and suggestions go to the person in charge of the feedback box. He compiles them and presents them to the line manager in charge, or to the management team.

A summary of feedback and ideas is presented to the management team at regular intervals.

If an employee initiative clearly presents a concrete solution to improve company business, and the production of that solution is not part of the employee's normal work tasks, the management team can, at their discretion, decide to pay an "initiative fee" for the idea.

4.6. Reporting grievances or abuse: whistleblowing

The following process applies to any whistleblowing that is not related to the discrimination and harassment of Aplicom personnel. Staff processes have already been defined earlier in this document.

The kind of reporting described here includes what is commonly called "whistleblowing", which includes a suspicion, usually anonymous, of any serious misconduct or illegal activity detected or strongly suspected in the course of conducting normal business. Whistleblowing follows Aplicom's grievance reporting process. It does not have to comply with the formal process set out by the EU, as Aplicom is not big enough in terms of either personnel or turnover.

Irregularities are to be reported using a form on the Aplicom Intranet, which forwards the message anonymously if the author does not attach his or her name to it.

The primary recipient of and person responsible for such notifications is the Occupational Health and Safety Manager. A copy is also sent to inform the Occupational Health and Safety Officer.

The Occupational Health and Safety Manager should immediately take action based on the notification, with any necessary support from other company management. The notifications and the actions the Manager takes in response should be reported to both the Aplicom management team and the Occupational Health and Safety Committee at its regular meetings. If needed, an emergency meeting of the Committee may be called to discuss the matter.

If necessary, the Occupational Health and Safety Committee acts confidentially as an alternative reporting channel and as employee support, especially if company management cannot be objective about the report. If the situation requires it, the Committee may also contact external parties, such as trade unions, occupational health care, or the relevant authorities.

5. Business ethics

5.1 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.

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

5.2 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 lawful conduct of our business.

Only people who need to handle data as part of their work 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.

5.3 The handling 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 employees to comply with their obligations.

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

5.4 Fair competition and cartels

We comply with the competition and antitrust 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.

5.5 Conflicts of interest

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

5.6 Copyright

We protect our own trademarks and copyright to the extent and manner we consider most appropriate, and we do not abuse the rights of others.

5.7 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 arrangements.

5.8 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.

6. Environment

6.1 Environmental responsibility

Our core mission is partly based around reducing environmental impact.

In the same spirit, we endeavour to show 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.

6.2 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.

6.3 Staff training

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

Annex 1. Equal treatment and the prevention of harassment and discrimination in practice

1.1. Legislation

The Occupational Health and Safety Act prohibits harassment that causes harm or danger to an employee's health.

The purpose of the Equality Act is to prevent discrimination based on gender and to promote equality between women and men, and thereby improve the position of women, especially in working life.

Under the Non-Discrimination Act, the employer must assess the implementation of equality in the workplace and, taking into account the specific needs of the workplace, develop work conditions and fair procedures for recruitment and making decisions regarding personnel.

1.2. Our principles

We would like Aplicom to be a good place to work, where all employees behave towards each other equally and fairly and no one is discriminated against, harassed, or otherwise treated poorly. We have zero tolerance for all forms of harassment and discrimination. This applies to both our current staff and the recruitment of new employees.

Zero tolerance means that in this document and in all its activities, Aplicom management communicates clearly that no harassment or bullying of any kind is acceptable in the company. In addition, zero tolerance means that any person experiencing such improper behaviour should draw attention to it, and every employee should raise the issue and intervene whenever it is noticed. Finally, zero tolerance also means that the supervisor or another representative of the employer intervenes promptly and appropriately after receiving notification of bullying, harassment or other unacceptable conduct.

Here we describe what harassment is and what it is not and how we should act if someone is treated improperly.

A separate equality plan will be developed in 2021 to describe our principles, goals and identified areas for development to reach full equality in the workplace.

We also require that our partners and their subsidiaries follow the principles we outline here.

1.3. What is harassment and what is it not?

Harassment is a systematic and persistent negative activity or behaviour.

Examples of harassment include:

- repeated threats
- intimidation
- malicious and suggestive messages
- derogatory and mocking comments
- constant unjustified and worsening criticism
- questioning reputation or position

- isolation from the work community
- unwanted sexual advances
- abuse of management position

Not all misconduct in the workplace is harassment or poor treatment according to the law. For example, mild individual actions (e.g. occasional arguments in work matters or off-topic comments) are not harassment.

The planning, management and supervision of work with the scope of the employer's authority is not harassment, either. The employer has the right to decide on the quality, scope, methods and procedures used in the company.

Examples of things that are not harassment include:

- factual, reasoned decisions and instructions concerning the employer's work and work management
- communal handling of work and associated problems
- justified interference with work performance
- issuing a warning for a valid reason
- directing the employee to assess work capacity for a valid reason.

Even if a behaviour is not prohibited under the law, it may be irresponsible, and therefore still not allowed. Irresponsible actions disrupt and complicate work as well as build resentment, cause irritability and lower work motivation.

Irresponsible behaviour at work can be arbitrary actions, a lack of compliance with common work agreements and rules, doing things that call into question the skills and work of others, dramatic outbursts of emotion, demanding and taking special rights, engaging in a go-slow or refusing to work based on personal rather than professional opinion..

Addressing irresponsible work behaviour is always the job of the supervisor.

1.4. Procedure when experiencing harassment or other improper behaviour

Every employee has a duty to report any harassment or discrimination they experience or witness to their supervisor or other representative of their employer.

The employer is required to address harassment in the workplace once they learn of it.

If you experience bullying, harassment or other inappropriate behaviour in the workplace, follow this procedure:

- Talk to the person you feel has treated you badly as soon as possible about what he or she is doing. Be clear that you feel this behaviour is inappropriate and that you are not comfortable with it. Describe the behaviour in concrete terms and ask the person to stop or change his or her actions.
- If the bad behaviour continues, tell the person that you will take the issue to your supervisor (or other employer representative, or health and safety representative). If the harasser is your supervisor, say that you will take it to his or her supervisor. Then go and speak with the appropriate supervisor. If necessary, you can also contact the occupational health service.

- Upon notification, the employer shall immediately take steps to investigate the matter. This should happen within two weeks of notification. The employer's representative will first investigate the course of actions and events perceived as harassment, impartially and from each side. In practice, the employer's representative first talks to all parties separately, and then holds a joint discussion, at which time each party can be heard and agree on measures to resolve the situation. If necessary, the employer can use external experts to help clarify the situation, but the employer is always the main party responsible for investigation and taking necessary action.
- After joint discussions, the employer shall consider what further action is needed to resolve the situation. If the employer considers that harassment has taken place, there is an obligation to stop it from continuing. One way the employer can do this is to get the supervisor to explain clearly what is inappropriate and to explicitly prohibit that behaviour. It is part of the supervisor's job to clarify what workplace behaviour is appropriate and what is not.
- Final conclusions from the employer's investigation and the instructions and rules that apply to the parties involved to end the harassment shall be recorded by the employer's representative. The employer also monitors that the agreed measures are followed and are sufficient. If the harassment continues, the employer has the right to take disciplinary action, such as giving the harasser a formal warning.
- Once the employer concludes that there is no more harassment taking place, the employer's representative shall clearly state and justify this to the parties involved. If there are other problems causing the experience of harassment, such as work arrangements or social interaction at the workplace, the employer shall take action to address these issues.

1.5. Sources

The following sources were consulted in the production of this document:

<https://www.tyosuojelu.fi/tyoolot/epaasiallinen-kohtelu>

<https://www.ttl.fi/tyoyhteiso/tyopaikkakiusaaminen/>

https://ttk.fi/tyoturvaluus_ja_tyosuojelu/tyoturvaluuden_perusteet/tyoyhteiso/hairinta_ja_epaasiallinen_kohtelu