

PROCEDURE:

mobilitas_all_en_esg_pro_CODE OF CONDUCT_2024_v1

CODE OF CONDUCT

Creation and modifications						
Version	Written by	Verified by	Approved by	Evolution	Activities	Diffusion
V1	O. KLOPPERS ESG COORDINATOR 06/06/2024	R. WEBBER-GREEN EXECUTIVE ASSISTANT 06/08/2024	C. CASTRO CEO 19/08/2024	Creation	All	External

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INTRODUCTION

Welcome to the MOBILITAS Group's Code of Conduct. This document outlines the standards we uphold for conducting business, reflecting our commitment to integrity, transparency, and ethical behaviour across all facets of our operations. It serves as a roadmap for every member of our Group, ensuring we maintain the highest standards of conduct in our interactions with colleagues, business partners, and other stakeholders.

Each employee is expected to read and adhere to the rules of conduct outlined in this document. Employees receive training on this Code as part of their induction program. For existing employees, the training will also be available on the group's training platform.

This Code of Conduct is agreed to and signed by the Chief Executive Officer of the MOBILITAS Group.

STANDARD RULES OF CONDUCT

As employees and representatives of the MOBILITAS Group, or one of its entities, we:

1. Behave honestly, are trustworthy and set a good example.
2. Ensure that our behaviour complies with the existing policies and rules of the MOBILITAS Group.
3. Use our resources in the best interest of the MOBILITAS Group, without misusing them.
4. Shall not, under any circumstances, pay or accept bribes, or be involved in incidents of corruption.
5. Don't accept gifts, hospitality or expense payments of disproportionate value, without receiving approval from our line manager.
6. Don't grant financial or other support to political parties or political campaigns.
7. Never enter into agreements with competitors that restrict competition, such as price-fixing or market division.
8. Make a clear distinction between the interests of the MOBILITAS Group, and our private interests, avoiding possible conflicts of interest.
9. Ensure that we comply with legislation in every country we operate.
10. Report incidents, risks and issues that deviate from our policies.



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BRIBERY AND CORRUPTION

Definition

- **Corruption** is the abuse of power or position for personal gain, which can include activities such as bribery, fraud, embezzlement, and favouritism.
- **Bribery** is the act of offering, giving, receiving, or soliciting something of value to influence the actions or decisions of an individual in a position of power or authority.

Rules of Conduct

No employee shall, under any circumstances, pay or accept bribes, or be involved in incidents of corruption.

GIFTS, HOSPITALITY, AND EXPENSE PAYMENTS

Definition

Gifts, Hospitality, and Expense Payments refer to any benefits, presents, or entertainment offered or received in a business context, including meals, travel, and accommodation.

Rules of Conduct

An employee in his/ her professional capacity shall not give or receive courtesies which could be seen as an illegal or improper exchange. An employee must refrain from offering courtesies which go against the recipient's standards.

An employee in his/ her professional capacity is not allowed to accept or give courtesies, which involves cash or equivalents. Gifts, hospitality and expenses may be offered or received, provided they will not motivate favouritism and/or create any obligation. All courtesies must be reasonable and may not be offered regularly.

Courtesies in the form of travel, meals, receptions, sightseeing, gifts or other expenses may only be offered or given to persons with a professional interest in the relationship and not to any spouses and relatives.

To prevent gifts, hospitality and entertainment from having an undue influence on business decisions, gifts, hospitality and expense payments must be proportionate to the employees' function & stature.

An employee in his/ her professional capacity must always ask approval from their line manager to accept gifts, hospitality and expense payments.



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POLITICAL AND CHARITABLE CONTRIBUTIONS AND SPONSORSHIPS

Definition

Political and Charitable Contributions and Sponsorships refer to the donations and support provided by an organization to political parties, candidates, or campaigns, as well as non-profit organizations, community services, and events, often aimed at influencing policy, supporting social initiatives, or gaining promotional benefits.

Rules of Conduct

An employee in his/ her professional capacity shall not grant financial or other support to political parties or political campaigns.

Community support and donations are acceptable be it in-kind, knowledge, services exchanged or direct financial contributions. However, managers and employees must ensure that charitable contributions and sponsorships are not used as a subterfuge for, or constitutes, bribery.

In relation to donations and community support, local stakeholders should be consulted to establish relevant needs.

FACILITATION PAYMENTS

Definition

Facilitation Payments are small, unofficial payments made to government officials or employees to expedite or secure the performance of routine, non-discretionary tasks or services that the payer is already entitled to receive.

Facilitation payments are a form of bribery made with the purpose of expediting or facilitating the performance by a public official for a routine government task, and not to obtain or retain business or any other improper advantage.

Rules of Conduct

An employee in his/ her professional capacity shall not grant facilitation payments, and any incidents must be reported to the line manager.



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ANTI-TRUST PRACTICES

Definition

Anti-Trust practices are actions that ensure fair competition in the market by prohibiting unfair activities like price-fixing, dividing markets, or any behaviour that restricts competition and creates monopolies.

Rules of Conduct

Each employee in his/ her professional capacity is expected to adhere to anti-trust laws by avoiding agreements with competitors that restrict competition, such as price-fixing or market division.

The MOBILITAS Group condemns all anti-competitive practices and has a zero-tolerance approach towards this behaviour amongst its employees. The group seeks to operate only in markets free from practices such as price fixing or intimidation. Our subsidiaries comply with all local laws relative to anti-competitive practices and price fixing in the countries where we operate.



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Implementation

Roles and responsibilities

It is every employee's responsibility to prevent bribery and corruption in the MOBILITAS Group and to comply with this Code of Conduct.

Every manager and employee has an independent obligation to secure that any interaction with public officials complies with all relevant laws and regulations, as well as this code.

It is the responsibility of every manager to communicate this code and ensure that all relevant employees and external parties working on behalf of the MOBILITAS Group, within their area of responsibility, understands and complies with this procedure.

Business relationships

- Subsidiaries and business partners: Each employee in his/ her professional capacity must act with due care before engaging with a business partner, ensuring that they know and respect our Code of Conduct.
- Distributors and agents: Each employee in his/ her professional capacity has the responsibility to ensure fair compensation for distributors and agents. Employees must document relationships with distributors and agents (e.g. through a contract), and enforce adherence to the subsidiary's Supplier Code of Conduct. The Mobilitas Group monitors conduct and will terminate relationships with distributors and agents for incidents of bribery or misconduct.
- Contractors and suppliers: Each employee in his/ her professional capacity has the responsibility to conduct procurement practices with fairness and transparency, carefully evaluating major contracts and suppliers. Subsidiary-specific Supplier Code of Conducts will be enforced on contractors and suppliers. The MOBILITAS Group monitors conduct and will terminate relationship with contractors and suppliers for incidents of paying or soliciting bribes. All subsidiaries of the MOBILITAS Group will avoid dealing with prospective contractors and suppliers known to pay bribes.
- Communication and training: The branch managers of our subsidiaries are responsible for ensuring all employees understand and adhere to this Code of Conduct, with mandatory compliance training provided to managers on relevant laws and standards. Each employee will receive the relevant training and new employees will be briefed as part of the Induction program.

Sanctions:

Should an employee of the MOBILITAS Group or one of its subsidiaries not comply with the rules of conduct outlined in this policy, their line manager will be responsible for applying a relevant sanction, in accordance with the local legislation. No employee will be penalised or be subject to adverse consequences for refusing to pay bribes even if it may result in the MOBILITAS Group losing business.

Ph. GIORNELLA