

Code of Conduct Policy

General Principles

At Icomera, the most important task for all employees is to develop and maintain an economically healthy and successful business. Icomera follows its responsibilities wherever we have effective control. Those responsibilities are towards the communities and environments in which we operate, towards our employees, business partners and towards society in general.

For this reason, we have defined a number of ground rules that guide our actions:

- We conduct our business with integrity and morals.
- We follow the laws and regulations of the countries in which we operate.
- We respect the United Nations Declaration on Human Rights, and accept our responsibility to respect those rights, which pertain to our conduct towards both our employees and towards the communities amongst whom we operate. This includes activities, which affect indigenous peoples' rights.
- We have open-minded dialogue with those affected by our operations.
- We respond to inquiries from external parties and communicate with affected parties in a timely and efficient manner.
- In the areas in which we have influence, we endeavour to ensure that our suppliers, subcontractors and partners adhere to the principles of this Code of Conduct in connection with our projects.

Employee Relations

Having a strong and lasting relationship with all employees, built on mutual respect and dignity, is very important for Icomera. Employment conditions offered to employees will comply with the minimum requirements of national law.

- We provide a safe and healthy working environment and are committed to continual improvement.
- We provide equal opportunities regardless of gender, gender identity or expression, ethnicity, religion or other beliefs, disability, sexual orientation or age. We do not allow any discrimination or harassment.
- We provide employees, and other persons working with Icomera, different ways to report grievances and legitimate concerns so that proper review and action can be ensured, without any report incurring retaliation.

- We recognize the right of workers to form or join trade unions in accordance with the respective country's laws and principles.
- We provide employees with educational opportunities that support their current and future work plans.
- We do not employ any person under 18 years old or any applicable higher legal minimum age.
- We do not use forced labour, slave labour or other forms of involuntary labour in our work environment. We do not allow any practice that restricts free movement of employees.

Market Conduct

- Corruption, bribery and unfair anti-competitive actions distort markets and hamper economic, social and democratic development. Icomera will not tolerate such practices.
- We shall not act contrary to applicable competition laws.
- We shall not, directly or indirectly, offer or give any undue pecuniary or other consideration to any person or entity for the purpose of inducing such person or entity to act contrary to their prescribed duties, or for the purpose of obtaining, retaining or directing business or other improper benefits within the framework of Icomera business.
- We shall not, directly or indirectly, solicit or accept any form of improper payment or other remuneration provided in order to induce us to act contrary to prescribed duties.
- We have controls within our IT procedures to ensure adequate protection for our customers.
- We maintain organizational structures, management systems, procedures and training plans to ensure that relevant laws, regulations and standards are followed.

Quality and Environment

Icomera strives to be a leading communications solutions provider to the transport sector, where we can contribute to effective and sustainable development when it comes to getting people to choose public transport. We can thus actively contribute to the development of a healthier environment.

- Our Quality and Environmental Management System is ISO 9001 and 14001 certified.
- To achieve continuous improvement, we involve our workforce, key suppliers and partners, in quality and environmental management.
- Our aim is to continually improve the quality and environmental credentials of our projects, products and services. We achieve this by finding ways to continually improve their quality and reduce any negative environmental impact incurred throughout their life cycle.

Document Information

Document Number	QR-56929
Document Classification	Public
Document Type	Policy
Author	HR
Approved By	Global Management Team
Version	1.5
Approved Date	10th October 2022

Revision History

Date	Version	Comment
2015-09-16	1.0	Created
	1.1	Approved
2019-02-06	1.2	Document formatting amended by Marketing
2020-02-14	1.3	Document formatting amended by Marketing
2022-03-14	1.4	Document formatting amended by Marketing
2022-10-07	1.5	Reviewed and amended second paragraph 'Employee Relations' section. Updated 'age' on employment. Updated description on managing discrimination
2022-10-10		Approved
2022-10-18		Changed document classification to Public