

# Third-Party Code of **Ethics and Conduct**



## 1. Mobilis Commitment to **Integrity**

Mobilis conducts its activities based on the highest standards of integrity, transparency, accountability and respect for applicable laws. The company believes that sustainable business relationships are built on trust, ethical conduct and responsible corporate practices. This Code establishes the principles and expected standards of conduct applicable to suppliers, business partners, representatives, consultants, intermediaries, consortium members, subcontractors and any other third parties acting for or on behalf of Mobilis in any country.

## 2. **Applicability**

This Code applies to all individuals and legal entities that provide products or services to Mobilis or act on behalf of the organization in any commercial or institutional context. Third parties are expected to extend these standards to their own supply chains, ensuring that subcontractors, representatives and partners also comply with the principles set forth herein.

## 3. Compliance with **Laws and Regulations**

Third parties must comply with all laws, rules and regulations applicable in the jurisdictions in which they operate. This includes anti-corruption legislation, competition laws, labor regulations, environmental regulations, data protection laws and any other legal requirements applicable to business activities. Mobilis expects its third parties to observe applicable international standards relating to anti-corruption and corporate integrity, including where relevant the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act and other equivalent international instruments.

## 4. **Anti-Corruption** and Anti-Bribery

Mobilis maintains a zero-tolerance approach to any form of corruption. It is strictly prohibited to offer, promise, authorize, request or accept any undue advantage with the purpose of influencing commercial or governmental decisions. This includes facilitation payments, illicit commissions, contractual fraud or any other form of improper benefit.

## 5. **Fraud, Money Laundering** and Terrorist Financing

Third parties must not use operations related to Mobilis for money laundering, terrorist financing or any other unlawful activity. Reasonable due diligence measures must be adopted to verify the legitimacy of business partners and the origin of funds. Third parties should also ensure that they do not maintain business relationships with individuals or entities listed in international sanctions or restricted party lists issued by competent authorities, including where applicable the United Nations, the European Union, the United States and other relevant jurisdictions.

## 6. Sanctions and **Beneficial Ownership**

Third parties must ensure that they do not engage in commercial relationships with individuals or entities subject to economic sanctions or legal restrictions imposed by national or international authorities. When requested, they must provide transparent information regarding their ownership structure and ultimate beneficial owners.

## 7. International Trade and **Export Controls**

Third parties must comply with all applicable laws and regulations related to international trade, including export control rules, import regulations, economic sanctions and trade embargoes. No third party may use products, services or technologies related to Mobilis in violation of trade restrictions imposed by national or international authorities.

## 8. **Conflicts** of Interest

Situations in which personal, financial or other private interests could improperly influence business decisions must be promptly disclosed to Mobilis. The company will evaluate such situations and determine appropriate mitigation measures where necessary.

## 9. Gifts, Hospitality and **Entertainment**

Gifts, hospitality or business courtesies must have a legitimate business purpose, be of reasonable value and be consistent with professional activities. Cash payments or cash equivalents are strictly prohibited.

## 10. Fair **Competition**

Third parties must respect competition laws and must not engage in practices such as cartel formation, bid manipulation, exchange of sensitive information between competitors or any conduct that may distort fair competition.

## 11. Books, Records and **Transparency**

All financial records and supporting documentation related to transactions must accurately reflect the true nature of the operations carried out. Mobilis expects its partners to maintain proper documentation and to allow legitimate audits when applicable.

## 12. **Privacy** and Data Protection

Third parties must protect confidential information and personal data in accordance with applicable data protection laws. Appropriate measures must be implemented to prevent unauthorized access, loss or improper disclosure of information.

## 13. Human Rights and **Labor Practices**

Mobilis does not tolerate child labor, forced labor, human trafficking, discrimination or harassment. All partners are expected to promote safe, respectful and inclusive working environments. Mobilis supports the principles set forth in the United Nations Universal Declaration of Human Rights and the core conventions of the International Labour Organization (ILO). Third parties are expected to operate in accordance with these principles across their operations and supply chains.

## 14. Health, **Safety** and Environment

Third parties must comply with occupational health and safety regulations and adopt responsible environmental management practices aimed at minimizing the environmental impact of their activities.

## 15. **Supply Chain** Responsibility

Third parties must promote equivalent standards of integrity and sustainability within their supply chains, adopting risk management practices and monitoring critical suppliers when appropriate.

## 16. **Reporting** Channel

Mobilis provides secure and confidential channels for reporting violations or suspected misconduct. Reports made in good faith will be handled confidentially and individuals reporting concerns will be protected against retaliation.

## 17. **Audits** and Investigations

Mobilis may conduct audits or request additional information to verify compliance with this Code. Third parties are expected to fully cooperate with such requests, within reasonable limits of confidentiality and proportionality.

## 18. Consequences of **Non-Compliance**

Failure to comply with this Code may result in contractual measures, including suspension of payments, termination of agreements or other legal actions as applicable.

## 19. **Effectiveness** and Acceptance

This Code forms an integral part of the agreements executed with Mobilis and becomes effective upon publication. Acceptance occurs through signature or by means of a contractual adherence clause. This Code may be periodically updated to reflect regulatory developments, international governance best practices and the evolution of the Mobilis Integrity Program.

 **MOBiLiS**  
TRAFFIC SYSTEMS

