

An aerial photograph showing a kayaker in a narrow, orange kayak on a dark, choppy body of water. The kayaker is wearing a green top and is positioned near a large, white, textured ice floe that occupies the right side of the frame. The water is dark blue/black, and the ice is white with some dark patches.

# Code of Conduct

Issue number 2  
May 2019







Our way



# What we stand for as u-bloxians

**The right way. Every day.**

## Our Code

**As u-bloxians, we know that there is something special about our company, our people and how we do things. The work we do at u-blox matters.**

### **What is expected of me?**

The u-blox Code of Conduct is an important resource that sets forth our fundamental commitment to conducting business ethically and honestly. We are absolutely committed to winning with integrity! The Code of Conduct clearly lays out what we ask of you, and is designed to help us deal with difficult situations, upholding our reputation as a company with integrity that can be trusted. We do business responsibly and ethically, and are committed to sustainable development, while respecting the needs of the individual, the society and the environment.

### **Raise your concerns!**

If you are in doubt about correct business behavior, seek advice. If you are worried about compliance, speak up. The u-blox Code of Conduct is here to tell you where you can find help and to show you how you can raise a compliance concern.

Our Code of Conduct is based on the UN Global Compact’s ten guiding principles, simplified into seven core principles.

# 1

## Respect and support of human rights

- We respect internationally recognized human rights and ensure that we do not contribute in any way to human rights abuses.

# 2

## A positive work environment

- We treat each employee with dignity and respect. We are committed to creating a work environment without discrimination and harassment, and one in which diversity is encouraged.
- Forced or compulsory labor is not tolerated.
- Child labor is prohibited.

# 3

## Environmental protection

- We protect the environment through optimization of our operations and responsible use of natural resources.
- We develop products that offer environmental benefits and minimize the use of hazardous substances.

# 4

## Promoting health and safety

- We provide all employees working under our direction with a healthy and safe work environment, and continuously strive for improvements.

# 5

## Ethical business behavior

- We conduct our business in an ethical, lawful, and responsible manner, and promote the same behavior within our sphere of influence.
- We are against all forms of corrupt practices, including bribery and extortion.
- We compete fairly wherever we do business.
- We promote sustainable business practices in our supply chain.

# 6

## Engaging with society

- We strive to improve how we contribute to the sustainable development of the communities and societies in which we operate.
- We are committed to being accountable to our stakeholders and report publicly on our performance.

# 7

## Weapons-related technology

- We do not sell when the intended use of the products is for integration into weapons (e.g. guns, cannons), or weapon systems (e.g. systems for identifying or localizing targets or for the guidance of missiles, bombs or bullets), including for testing and simulation of such weapon systems.



**At u-blox, we respect internationally recognized human rights and take steps to ensure that we do not contribute to human rights abuses.**

We see diversity as a strength, and we strive to provide an inclusive work environment in which your individual ideas, perspectives, and beliefs are respected.

We are committed to providing our employees with equal opportunities. That means that you will be hired and promoted based on your qualifications, performance, and abilities.

We do not tolerate discrimination against any of our employees based on their race, color, religion, national origin, gender, sexual orientation, disability, pregnancy, medical condition, marital status, or age.

We do not tolerate any kind of harassment: racial or sexual slurs, name calling, racist or sexist jokes, negative stereotyping, physical assaults, bullying, threats, or demeaning pictures.

We ask that you treat each other with respect and try to find commonly agreed solutions. If there are disagreements, you should engage in open discussions and take all viewpoints into account. We usually reach better decisions together than we would alone.



## u-bloxians treat each other with appreciation and respect.

u-blox attaches great importance to a positive work environment, and we are committed to promoting mutual respect and trust.

The u-blox Employment Policy sets out minimum standards of uniform business practices for you to follow. This policy also addresses topics such as recruitment, promotion, career development, remuneration, and diversity – and it clearly explains what we expect from you, our employees.

We regularly run global employee surveys, which give you the chance to submit candid, anonymous feedback on your needs and expectations, so we can find ways to improve. These surveys also help us to understand how involved you feel in the company.

We are committed to maintaining positive, enduring relationships with our partners. To ensure that all employees in companies we work with are also treated with respect and dignity, we have introduced a Suppliers' Code of Conduct. This requires our partners to conduct all their activities ethically and in line with the laws and regulations of their country. This Code covers areas such as forced labor, child labor, harassment, discrimination, pay, working time, freedom of unions, and health and safety.







## Protecting the environment

**We are aware that our operations can have direct and indirect impacts on the environment. In everything we do, we seek to minimize any negative environmental impact.**

We try to offer environmentally friendly products by applying strict standards and following international laws on environmental protection. We also try to use natural resources responsibly. We adhere to international regulations and standards that restrict and control hazardous substances (e.g. RoHS, REACH, Conflict Minerals, and ELV), and aim to enforce these standards throughout our supply chain.

We develop products that offer environmental benefits and try to minimize the use of hazardous substances. To support this, we ask our suppliers to follow similarly strict standards governing the use of chemicals used in our products.

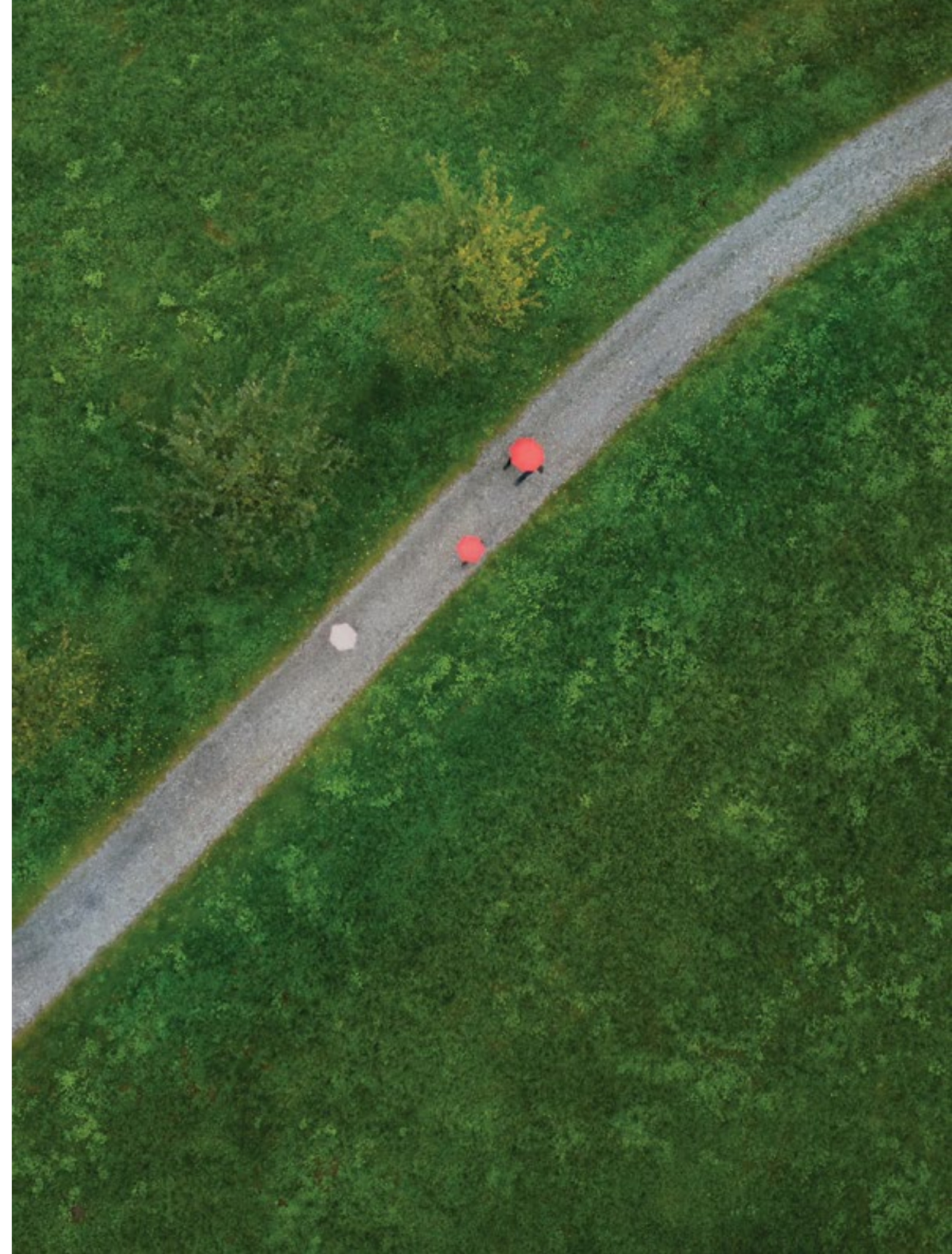


**The safety of our people is our number one priority. We believe that we must all take responsibility for maintaining a safe and healthy workplace.**

It is our duty to safeguard the health and safety of every employee at work. u-blox complies with international standards, related laws and regulations, and internal regulations governing your health and safety.

Meanwhile you are personally responsible for maintaining safety, security, health, and environmental protection in the workplace relating to your own duties to the best of your knowledge, ability, and experience.

We are equally concerned with the health and well-being of employees in our partners' factories. Our standards for suppliers (Supplier Code of Conduct) are therefore in line with international standards (Responsible Business Alliance) and based on internationally agreed principles. You can find out more about this in the Sustainable Supplier Program.





# In all of our dealings we are responsible, honest, and reliable.

**Zero tolerance. We are against corruption.**

**u-blox's external relationships are critical to our success. We conduct our business in an ethical, lawful and responsible manner and hope that this will influence others to do the same. We provide fair, accurate, timely, and easy-to-understand information to all our stakeholders.**

**We don't give bribes, and we don't take bribes**

Bribery is the offering, promising, giving, and accepting of an advantage in exchange for an action that is illegal, unethical, or a breach of trust. We ask you not to offer, promise, grant, or authorize the giving of money or anything else of value to anyone in connection with business dealings in order to obtain an improper advantage.

**Meals**

Doing business over a meal is usual practice around the world. You can offer a meal to a business contact without pre-approval if both points below are met:

- The meal is business related – i.e. it takes place in the course of a meeting or other occasion, the purpose of which is to hold business discussions;
- The value is that of a regular working meal under local standards – expensive drinks and delicacies should be avoided. See Meal Limits in the Anti-Bribery Guidelines.

**Gifts**

We promote successful working relationships with our business partners, who are vital to our success. With this in mind, you may consider offering or accepting appropriate gifts from a customer or business partner. However, you should be careful not to create a situation that might suggest a conflict of interest or give the appearance of an improper attempt to influence business decisions. You can read more about receiving and giving gifts in the Anti-Bribery Guidelines.

**Entertainment**

Invitations to entertainment events (for example, to attend plays or concerts) tend to have limited relevance to business, and so they can seem inappropriate. You can read more about invitation dos and don'ts in the Anti-Bribery Guidelines.



**Fraudulent practice includes any intentional misrepresentation or attempt to mislead another person, either by making or failing to make statements, which results in or is likely to result in financial damage or injury to the misled person.**

Fraud includes theft – the removal of cash or assets to which the individual committing the fraud is not entitled, and the falsification of accounting records, reporting, or other documents.

u-blox seeks to apply its funds to its strategic aims. Any loss through fraud will reduce the effectiveness of the company's missions. That's why fraud or attempted fraud are taken extremely seriously and lead to disciplinary action being taken against employees. These actions can include dismissal, as well as legal actions against all individuals involved, financial penalties, and penal action.

u-blox will investigate all reports of fraud or attempted fraud by internal and external resources. Any observed fraud must be immediately reported to the CFO.

u-blox reserves the right to report fraud or attempted fraud to the respective authorities.







**Information and trade secrets**

**IP**

u-blox’s intellectual property (IP) includes some of our most valuable assets and must be treated extremely carefully. It is very important to protect our IP to prevent competitors from taking away market share, slowing our growth and resulting in loss of revenue. IP refers to anything you or anyone in the company creates on company time, at u-blox’s expense, or within the scope of our business interests. It includes patents, software, documents, inventions, know-how, and trade secrets.

We are all responsible for protecting u-blox’s IP rights by complying with company policies and procedures for their protection. You can find out more about this in the IP Guidelines.

**We respect third-party IP**

Unauthorized use of the intellectual property of others can expose us to lawsuits, damages, and significant fines. We ask that you respect the IP rights of others, and take care to secure permission for their use.

**We are committed to free and fair competition.**

We will win in a fair and competitive marketplace by providing customers with high-quality goods and services at reasonable prices.

- We compete openly and independently on the open market. u-blox does not make any formal or informal agreements with competitors to fix or set prices, or to allocate products, markets, territories, or customers.
- We do not obtain or share current or future information about price, profit margins or costs, bids, market share, distribution practices, terms of sales, specific customers, or vendors with competitors.
- We do not agree with or require customers to resell our products at certain prices.

**Protecting our product development, financial base, knowledge base, information systems, competitive advantage, and brand keeps us at the forefront. We are all responsible for protecting information and trade secrets.**

**We look after u-blox’s assets**

We ask that you do not provide information about u-blox to people outside the company without approval and written agreement. You shall also help by being careful with personal information on social media, and with devices like laptops or memory sticks containing

confidential material. Be alert to requests for information from anyone outside of u-blox, including overall business trends, product bookings or shipments, customer information, lead times, IP disputes, product descriptions, pricing, product development, and roadmaps.



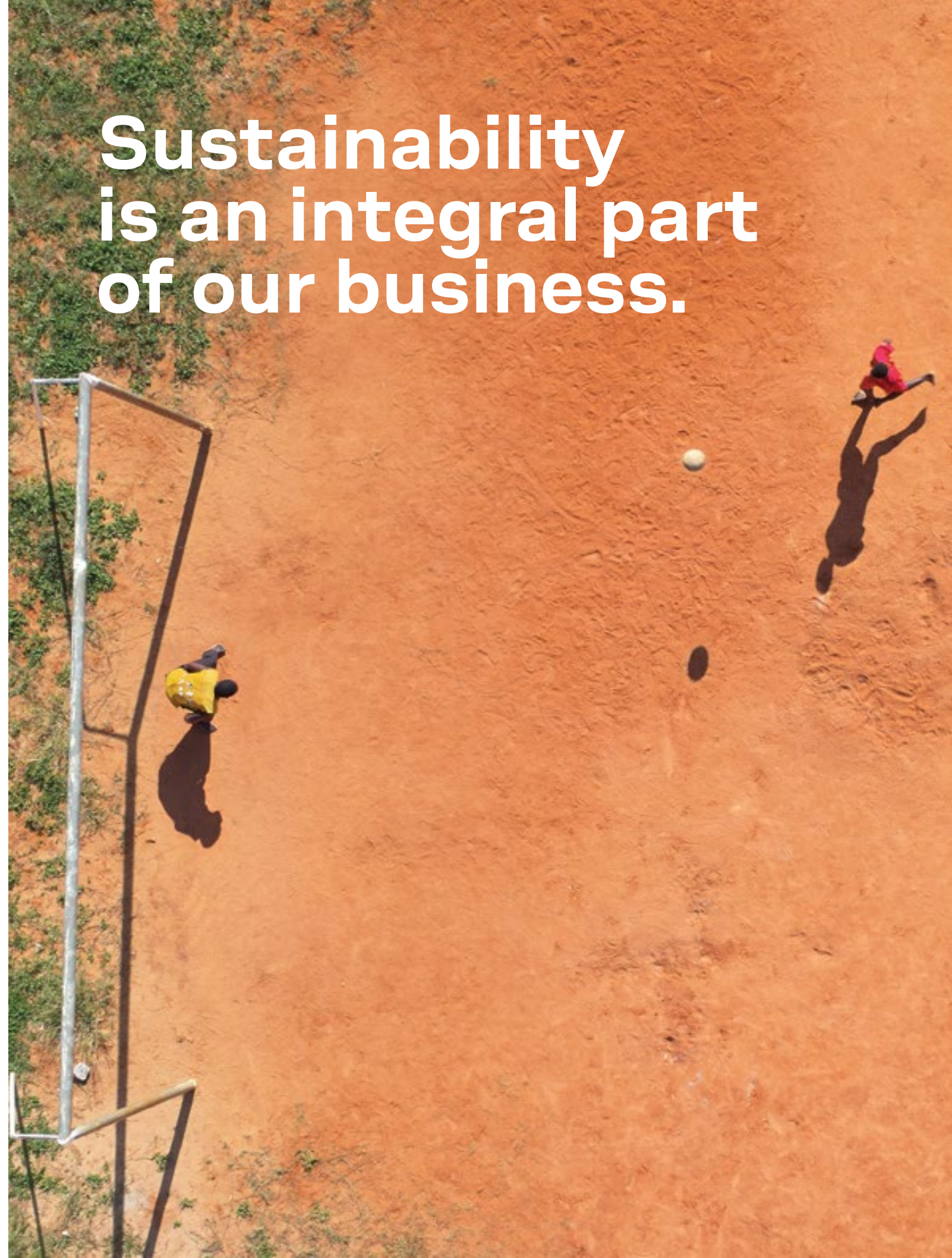
**We try to contribute positively to the sustainable development of the communities and societies in which we operate.**

u-blox's Corporate Social Responsibility (CSR) program promotes responsible business practices and social investments to create long-term value. We serve society by providing life-enhancing products and by actively supporting the communities in which we operate. We also provide generous financial and product support to community programs throughout the world.

Our engagements with society are grouped into five categories: Business Ethics, Employees, Environmental Responsibility, Supply Chain Responsibility, and Community.

You can read more about our sustainability program on our Wiki or on the website.

# Sustainability is an integral part of our business.





# Taking a responsible approach to weapons-related technology

We do not sell products when the intended use is for integration into weapons (e.g. guns or cannons), or weapon systems (e.g. systems for identifying or localizing targets, or for the guidance of missiles, bombs, or bullets). This includes the testing and simulation of such weapon systems.





## How to get help

### Do you have a question about the u-blox Code of Conduct?

The first place to turn is to your line manager. If you are uncomfortable discussing the issue with your line manager, please talk to a member of the Executive Team or Human Resources: they will be able to give you the guidance and advice you need. Our open-door policy means you can approach them with your concerns. On the Wiki you can also find a list of contacts.

### How can I uphold u-blox's key values of integrity and respect?

If you are ever unsure about an action, ask yourself the following:

- Is it legal?
- Does it feel right? Am I being fair and honest?
- How will I feel about it afterwards?
- How would it look on the front page of the newspaper?
- Could I justify it to my family?

If you answered “No” or “I’m not sure” to any of these questions, seek support and advice before continuing.

### Reporting concerns

Taking action to prevent problems is part of u-blox's culture. If you see possible unethical or illegal conduct, we expect you to report your concerns.



