

Speak Up Procedure

To All u-blox customers and suppliers

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1 Introduction

u-blox is a responsible company, complying with relevant laws and regulations and its Code of Conduct principles.

Our success and reputation depends on the behavior of each employee, customer and supplier. Maintaining trust and confidence of our stakeholders is crucial.

We encourage our customers and suppliers who have concerns about a (suspected) violation of laws or regulations to speak up.

Speaking up can be difficult. That is why we want a company culture without fear of punishment or unfair treatment for raising non-compliant behavior or situations.

2 Why are you encouraged to Speak Up?

u-blox wants to know about relevant non-conformant behavior in order to be able to take action. By reporting, you help u-blox. If you do not report, a situation may become worse.

3 Who can use the Speak Up platform?

All customers and suppliers.

4 What kind of issues can you raise?

In principle, any non-compliant behavior can be raised. The platform identifies topics (bribery, breaches of laws & regulations, etc.), but you can raise other topics as well.

Examples of topics which can be addressed through Speak-up

- A u-blox employee or someone within your organization has accepted or offered bribes.
- A u-blox employee or someone within your organization has accepted falsified documents/pricing or contributed to the falsification of documents/pricing.

5 What happens after you raise your concern?

After you write to the platform, you will receive a case number, which you can use to check the status of your concern and add additional information. This service is managed by an independent party (EQS). EQS is a service provider located in Germany. For further information, see www.eqs.com.

Your concerns will be sent to the Compliance Committee.

The Compliance Committee will review the case and determines whether:

- it is a reasonable suspicion of non-compliant behavior or
- further information is needed or
- a different procedure applies.

Within 10 working days (during holiday breaks or if further information is needed from you, the period can be extended) after receipt of your concern the Compliance Committee will decide whether or not the case will be further investigated and you will be informed about the decision.

6 If your concern is justified, measures will be taken

If the Compliance Committee concludes that the concern you reported is partly or fully founded, the Compliance Committee gives binding advice to the appropriate management level on measures to be taken. These measures can be disciplinary measures which can include dismissal, penal claims and/or civil claims against certain persons and/or organizational measures to prevent such an incident from happening again.

7 You will be informed about the judgement

The Compliance Committee will inform you about the decision. No further details can be given to preserve the confidentiality of the decision making process.

8 Compliance Committee

The Compliance Committee consists of the General Counsel and the Head of HR.

9 Customer and Supplier Cooperation

u-blox will greatly appreciate for all customers and suppliers to speak up in good faith. Good faith means that anyone else in your situation would likely have come to the conclusion that the behavior/situation is non-compliant and that raising the issue puts him/her at risk of retaliation if he/she were to address the issue with the non-compliant person or the person responsible for such non-compliance.

10 Protection

You and your organisation's anonymity is protected through EQS and nobody (not even EQS) can identify you.

If you decide to disclose your or your organisation's name on the platform or in the course of your correspondence with the Compliance Committee, the Compliance Committee will ensure that your or your organization's name will not be disclosed without your approval, unless you spoke up in bad faith or if required by mandatory provisions of law.

While it is up to you to decide to identify yourself or your organisation, u-blox may ask you to identify you or your organisation in order to be in a position to take appropriate action.

You can decide to not identify yourself or your organisation, but u-blox may then be obliged to close the case without taking action against the non-compliance.

If you have disclosed your or your organization's identity and feel punished or treated unfairly as a consequence of you speaking up, please inform the Compliance Committee via the platform.

11 Entry into Force

This procedure has been adopted by the Executive Committee of u-blox AG and is effective as of 10. February 2020 until amended.