

# Consat Telematics

## Supplier Code of Conduct

April 2026

**CONSAT**  
Telematics

# Message from the CEO



Pär Thuresson CEO Consat Telematics

**At Consat Telematics, we strive to be a long-term and responsible provider of intelligent transportation solutions, enabling more sustainable, efficient, and inclusive public transportation systems. Our success is built not only on technical expertise and innovation, but also on trust, integrity, and a shared responsibility for how we conduct our business.**

As a supplier to Consat Telematics, you are an important part of our value chain. We therefore expect our suppliers to share our core values and to act in accordance with applicable laws, internationally recognized principles, and high ethical standards. This Supplier Code of Conduct outlines the requirements and expectations we place on our suppliers in areas such as human rights, working conditions, environmental

responsibility, business ethics, and information security. We are convinced that responsible business relationships create sustainable value, for our customers, our employees, our suppliers, and society at large. Through open dialogue and collaboration, we aim to work together with our suppliers to continuously develop and strengthen our joint efforts toward a sustainable future.

*We thank you for your commitment and look forward to a long-term and trustworthy partnership.*

# Purpose

**Consat Telematics AB and all its subsidiaries seek to promote that working conditions in supply chains are safe, and that business is conducted responsibly, ethically, and with respect for human rights and the environment.**

This Supplier Code of Conduct (the “Code”) defines the minimum requirements and expectations placed on suppliers with regard to human rights, working conditions, health and safety, environmental responsibility, information security, and business ethics.

This Code applies to all suppliers, contractors, consultants, and other business partners that provide goods or services to Consat Telematics. Suppliers are responsible for complying with this Code within their own operations and for taking reasonable steps to ensure that equivalent standards are applied throughout their supply chains.

For suppliers engaged in electronics manufacturing or electronics-related production services, compliance with the Responsible Business Alliance (RBA) Code of Conduct is required **in addition** to this Code. In case of differences, the stricter requirement shall apply.

This Code is aligned with internationally recognised standards and frameworks, including the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the ILO Core Conventions, the OECD Guidelines for Multinational Enterprises, and relevant ISO standards such as ISO 14001, ISO 45001, ISO 26000, and ISO/IEC 27001.

The Code is made up of five sections:

Sections **A, B, C,** and **D:** Requirements for Labour, Health and Safety, Environment Responsibility, and Business Ethics.

Section **E:** Elements of an acceptable Management System to ensure conformity with this Code.

Consat Telematics is committed to obtaining regular input from stakeholders in the continued development and implementation of the Code of Conduct.



## Labor, Human Rights and Working Conditions

**Suppliers shall respect internationally recognised human rights and treat all workers with dignity and respect. This applies to direct and indirect suppliers, as well as all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.**

All forms of forced labour, bonded labour, human trafficking, and involuntary labour are strictly prohibited. Employment shall be freely chosen, and workers shall have the right to leave employment in accordance with applicable laws and contractual obligations.

Child labour shall not be used at any stage of operations. The minimum age of employment shall comply with applicable laws and international standards. Young workers shall not perform work that is hazardous or likely to jeopardise their health, safety, or development.

Working hours, overtime, rest periods, and leave shall comply with applicable laws and regulations.

Workers shall receive wages and benefits that meet at least legal minimum requirements and are paid regularly.

Suppliers shall ensure a workplace free from discrimination, harassment, abuse, retaliation, or any form of inhumane treatment.

Suppliers shall respect workers' rights to freedom of association and collective bargaining and shall ensure that employment terms are communicated in a clear and transparent manner.

Suppliers are expected to have appropriate processes in place to identify, prevent, mitigate, and address adverse impacts on human rights in their own operations and, where relevant, in their supply chains, in line with the UN Guiding Principles on Business and Human Rights.

Suppliers shall maintain documentation demonstrating how human rights risks are identified, prioritised, and addressed. Suppliers operating in higher-risk geographies or sectors shall conduct specific assessments related to modern slavery, forced labour, and human trafficking risks and shall maintain appropriate controls to mitigate such risks.

# B

## Health and Safety

Suppliers shall ensure that machinery, equipment, and work processes are safe and properly maintained. Risks related to physically demanding work, repetitive tasks, or manual handling shall be assessed and managed to reduce the likelihood of injury.

Workers shall receive appropriate workplace health and safety information and training in a language they understand regarding the hazards to which they may be exposed. Suitable personal protective equipment shall be provided where required.

Suppliers shall establish procedures for emergency preparedness and response, including appropriate training, communication, and evacuation procedures.

Work-related incidents, injuries, and near misses shall be reported, investigated, and addressed in order to prevent recurrence.

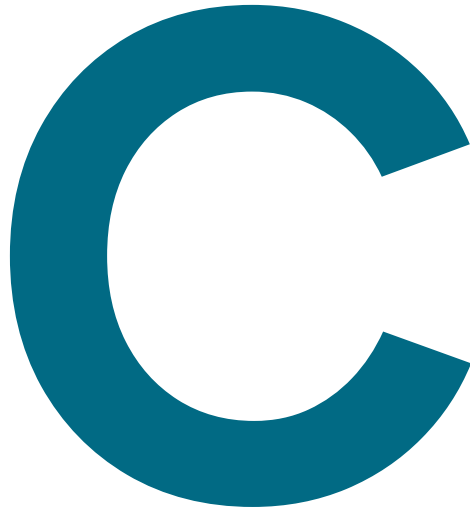
Suppliers shall provide workers with access to safe drinking water, sanitary facilities, and a workplace environment that supports health and wellbeing.

Suppliers are encouraged to maintain a structured occupational health and safety management system appropriate to the nature and risks of their operations.

**Suppliers recognize that a safe and healthy working environment is essential to prevent work-related injuries and illnesses and to support the wellbeing of workers. Suppliers shall provide a safe and healthy workplace and take proactive measures to identify hazards, assess risks, and implement appropriate preventive and protective measures.**

Suppliers shall identify, evaluate, and control occupational health and safety risks arising from workplace activities. Appropriate safeguards shall be implemented to minimize the potential for accidents, injuries, or exposure to hazardous conditions.





## Environmental Responsibility

Air emissions, wastewater, and waste generated from operations shall be monitored and controlled as required by applicable laws and permit conditions.

Suppliers shall monitor and document greenhouse gas emissions associated with their operations and are expected to demonstrate continuous improvement in energy efficiency and emissions performance, including efforts to reduce energy consumption and greenhouse gas emissions.

Where relevant, suppliers should track and document greenhouse gas emissions in accordance with recognised standards such as the GHG Protocol, including Scope 1, Scope 2, and significant categories of Scope 3 emissions.

Suppliers shall maintain appropriate environmental records and make relevant environmental performance information available upon request.

Suppliers operating in environmentally sensitive or water-stressed regions should assess environmental risks, including impacts on biodiversity and water resources, and implement mitigation measures where relevant.

**Suppliers shall comply with all applicable environmental laws, regulations, and permit requirements relevant to their operations. Environmental impacts associated with operations shall be identified and managed, and suppliers shall take measures to prevent pollution and promote the responsible use and conservation of natural resources, including energy, water, and raw materials.**

Hazardous substances and chemicals shall be identified, labeled, handled, transported, stored, used, and disposed of responsibly throughout their lifecycle in accordance with applicable laws and regulations.





## Business Ethics

**Suppliers shall conduct business with integrity, fairness, and transparency. All forms of bribery, corruption, fraud, and money laundering are strictly prohibited. Suppliers shall avoid conflicts of interest and shall promptly disclose any actual or potential conflicts of interest that may arise in the course of the business relationship.**

### Business Integrity

Suppliers shall maintain accurate, complete, and truthful books, records, and business documentation related to their operations and to the goods or services supplied to Consat Telematics. Falsification, concealment, or misrepresentation of records, transactions, data, or information is prohibited.

Suppliers shall conduct business in accordance with fair competition laws and shall not engage in anti-competitive practices.

Suppliers shall conduct business with Consat Telematics in accordance with high ethical standards and shall not offer, give, request, or accept any gift, hospitality, entertainment, or other benefit that is improper or capable of influencing, or appearing to influence, the recipient's duties or business decisions.

There is no monetary threshold for what may constitute an improper benefit. The assessment shall be based on the nature, context, intent, and perception of the benefit.

Swedish ethical standards apply regardless of local business customs or practices. Where local laws or practices permit conduct that would be considered improper under Swedish standards, such conduct shall not be applied in relation to Consat Telematics.

Benefits provided or received during procurement, tendering, negotiation, or decision-making processes are considered particularly sensitive and shall be avoided.

Suppliers shall comply with applicable anti-corruption laws and internationally recognised standards, including the OECD Anti-Bribery Convention.

### Intellectual Property

Intellectual property rights shall be respected. Transfer of technology and know-how shall be conducted in a manner that protects intellectual property rights, and customer and supplier information shall be safeguarded.

### Grievance Mechanisms and Whistleblowing

Suppliers shall maintain mechanisms that allow workers and stakeholders to raise concerns regarding unethical or unlawful practices without fear of retaliation.

Legitimate concerns shall be investigated and addressed in a timely and appropriate manner.

### **Responsible Sourcing**

Suppliers shall adopt a policy and exercise due diligence regarding the source and chain of custody of tantalum, tin, tungsten, gold, and cobalt used in the products they manufacture, in order to reasonably assure that they are sourced in a manner consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent recognised framework.

Where elevated risks are identified, suppliers are expected to conduct risk assessments within their supply chains, including beyond Tier 1 suppliers where relevant.

### **Privacy and Information Security**

Suppliers shall respect the privacy of personal information relating to employees, customers, suppliers, and other stakeholders and shall handle such information in accordance with applicable data protection laws.

Suppliers shall implement appropriate technical and organisational measures to ensure information security and to protect systems, networks, and information from unauthorised access, loss, or misuse.





## Management Systems

**Suppliers shall adopt or establish a management system appropriate to the nature, scale, and risks of their operations, with a scope related to the content of this Code. The management system shall support compliance with applicable laws, adherence to this Code, and continual improvement.**

Management representative(s) shall be designated to ensure implementation of the management systems and programs described in this Code. Management shall periodically review the status of the management systems to ensure their suitability, adequacy, and effectiveness.

Applicable legal requirements and relevant customer requirements related to this Code shall be identified, monitored, and complied with. Processes shall be established to identify and assess risks associated with operations and supply chains, including environmental, social, governance, and compliance risks. Appropriate measures shall be implemented to mitigate identified risks.

Objectives and measurable indicators related to the most significant risks and impacts shall be defined and reviewed periodically as part of management oversight.

### **Training and Communication**

Employees and relevant workers shall receive appropriate training and information necessary to understand their responsibilities in relation to this Code.

The principles of this Code, or equivalent standards, shall be communicated to suppliers, subcontractors, and business partners involved in the delivery of goods or services to Consat Telematics. Reasonable steps shall be taken to promote and monitor compliance throughout the supply chain.

Mechanisms allowing workers to provide feedback or raise concerns regarding workplace conditions or business conduct shall be maintained.

Documentation and records shall be maintained as necessary to demonstrate compliance with applicable legal requirements and the principles of this Code, while ensuring appropriate protection of confidential information.

### **Monitoring, Assessments and Corrective Actions**

Suppliers shall periodically evaluate their compliance with applicable legal requirements and the principles of this Code through appropriate monitoring or internal assessments.

Consat Telematics reserves the right to assess supplier compliance with this Code through appropriate means, including self-assessments, documentation reviews, or audits.

Where non-compliance is identified, suppliers shall cooperate in the investigation of issues and implement corrective actions within agreed timelines. Serious or repeated violations of this Code may result in suspension or termination of the business relationship.

### **Acknowledgement**

Suppliers are expected to formally acknowledge and comply with this Supplier Code of Conduct as a condition of doing business with Consat Telematics.





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