



# Global Code of Conduct

Do the right thing.

# Letter from the CEO

If I had to summarize our Code of Conduct in one sentence, it would be this: “Do the right thing.” This guiding principle served us well when Geotab was a small start-up, and it is serving us equally well today with roughly 3,000 employees and thousands of customers and partners around the world. Doing the right thing has helped us win the trust of our customers, partners, employees and other important stakeholders over more than 25 years of doing business. It has been as critical to our growth and success as creating innovative technologies and going the extra mile for our customers.

Our Code of Conduct helps us define what doing the right things means in various specific areas, situations, and circumstances. It helps us understand the standards of ethical behavior when operating in regulated industries, in different jurisdictions around the world, and with a large partner diversity. We must know what is expected and we must act accordingly. This is why having a well-documented Code of Conduct and training are so important.

Doing the right thing is who we are. It is our standard. Knowing, doing, and accepting accountability for the right thing is what ethics at Geotab is all about.

Neil Cawse



# Table of contents

01

Guiding principles of ethics and business conduct

02

Making the right choice

03

How to speak up

04

Speak without fear of retaliation

05

Handling external inquiries & government investigations

06

Conflicts of interest

07

Complying with competition laws

08

Anti-bribery and anti-corruption

09

Import and export compliance

10

Suppliers

11

Securing information, assets, and privacy

12

Responsible communication

13

Commitment to ethical work practices and human rights

14

Environmental impact

15

Employee conduct

16

Acknowledgment

17

Links

18

Contacts



01 **Guiding principles of ethics and business conduct**

- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts

# Guiding principles of ethics and business conduct

## Purpose

Geotab's Code of Conduct is a reflection of our ethics and values. It defines our ethical practices and provides clear guidance on business conduct. Our integrity is at the core of who we are and guides our decisions at every level. The Code is designed not only to prevent illegal or improper behavior, but also to preserve Geotab's reputation and ensure we uphold the highest ethical standards.

While it is not always easy to know what the right choice is, this Code is your compass for decision-making and will help you live Geotab's values. It will also direct you to other Geotab policies for additional guidance. Please familiarize yourself with this Code to understand our expectations. Whenever you face a decision you are unsure how to handle, return to this Code and our policies for support.



## 01 Guiding principles of ethics and business conduct

- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts



## Scope

All employees, consultants, and representatives of Geotab, regardless of location or position, are responsible for acting ethically and following our Code of Conduct. This includes all full-time and part-time employees, from interns to the executive team.

**Employees** are required to acknowledge that they have received and understood the Code, in addition to completing an annual attestation for the Code of Conduct and other key policies. We will review this document annually and may revise it at any time. You will receive a link to each new version of the Code, which you must acknowledge and follow.

**Managers** must consistently demonstrate integrity, promote ethical conduct within their teams, and maintain open communication about ethical behavior. They should encourage their team members to report any concerns that may violate the Code or a Geotab policy. Managers are also responsible for ensuring their employees complete the annual Code of Conduct and policies attestation. They should promptly escalate employee concerns to the Compliance team, which will engage the Legal and People Operations departments as needed for investigations. Managers are accountable for providing coaching to address behaviors inconsistent with our values and for upholding their team's compliance. Failure to address unethical behavior may result in consequences, up to and including termination, for everyone involved—including managers, who are responsible for the performance of their teams.

**01 Guiding principles of ethics and business conduct**

- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts

## Our commitment

Integrity is the foundation of all of Geotab's relationships. As a company, and as employees, we commit to:

- Complying with all applicable laws, regulations, rules, codes, and standards everywhere we operate.
- Conducting all business, both internal and external, fairly and ethically.
- Interacting respectfully and responsibly with each other, our customers, our business partners, and our communities.
- Maintaining the highest standards of integrity and ethical business conduct in all our interactions with commercial and government customers around the world.



- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice**
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts

# Making the right choice

Acting ethically starts with being knowledgeable and aware. To determine if a situation has an ethical dimension and decide how best to address it, ask yourself the following questions:

<b>Does my action or decision align with the company's values?</b>	✓ If <b>YES</b> , then proceed	✗ If <b>NO</b> , stop and reconsider
<b>Does my action or decision follow the company's policies, including the Code and Regional Handbooks, as well as all applicable laws?</b>	✓ If <b>YES</b> , then proceed	✗ If <b>NO</b> , stop and reconsider
<b>Would I be comfortable with my family, friends, or colleagues knowing about my action or decision?</b>	✓ If <b>YES</b> , then proceed	✗ If <b>NO</b> , stop and reconsider
<b>Would I be comfortable if my action or decision were reported on the front page of a newspaper or shared on social media?</b>	✓ If <b>YES</b> , then proceed	✗ If <b>NO</b> , stop and reconsider

Unless you can answer **"YES"** to all these questions, you must **STOP** and seek advice.

- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up**
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts

# How to speak up

We encourage all employees to ask questions, seek guidance, and promptly report any suspected violation of the Code, company policy, law, or regulation. Your input is vital to maintaining our commitment to integrity.

Please feel free to reach out to any of these resources:

- **Integrity Helpline**, our confidential reporting system
- Your manager
- Another manager or leader at Geotab
- Your HR Business Partner
- **[ethicsreporting@geotab.com](mailto:ethicsreporting@geotab.com)**

For HR concerns, including harassment or other workplace issues, please contact your **HR Business Partner** directly.



While we hope you will use these internal reporting methods first, you have the right to contact government agencies to report suspected violations of law or to participate in government investigations. You are not required to notify Geotab before filing a report with a government agency, and we will not retaliate against you for doing so. Please engage the Legal and Compliance departments if you are approached to participate in a government investigation.

If you prefer to remain anonymous, the **Integrity Helpline** is a confidential reporting tool accessible to every employee. You can submit information about activities such as workplace theft, fraud, bribery, or other actions that do not align with our values. Reports can be submitted online without a username or password, or you can speak with an operator over the phone in more than 150 languages.

All reports will be handled with strict confidentiality to the extent possible under legal constraints. You may remain anonymous, although this might make it more difficult to follow up and resolve your inquiry.

- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation**
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts

# Speak without fear of retaliation

Geotab has a **zero-tolerance policy** against retaliation. Our **Whistleblower and Non-Retaliation Policy** affirms our commitment to protecting anyone who raises a concern in good faith. This policy, along with our **Ethics Investigations Policy**, provides a secure framework for reporting and ensures all concerns are handled fairly and confidentially. If you believe you have faced retaliation, you must report it immediately.

Under no circumstance will any employee be subject to disciplinary or retaliatory action for filing a good faith report of a suspected or actual ethics violation. If you believe you have been retaliated against for any reason—whether for confronting a coworker about an ethics violation, reporting non-compliance, or participating in an investigation—contact our **Ethics Reporting email** immediately.

## What if...?

**I reported a potential conflict of interest regarding my supervisor a few months ago. The issue was resolved, but now I feel like I'm being professionally isolated. I haven't been invited to key project discussions I should be a part of, and my last performance review was surprisingly negative despite my strong results. It's nothing I can definitively prove, but it feels like payback. What should I do?**



You should report your concerns immediately. Retaliation is not always obvious and can take many forms, including being excluded, receiving unfair evaluations, or being passed over for opportunities. We take all forms of retaliation, both direct and subtle, very seriously. Please speak with your HR Business Partner or the Compliance department. We are committed to ensuring that you can raise concerns in good faith without any fear of negative consequences for your career.



- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations**
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts



# Handling external inquiries & government investigations

To ensure accuracy and protect Geotab's information, all requests for company documents from external third parties must be referred to the Legal department. Do not share any information without their prior approval.

If you are contacted by a government agent, you must refer them to the Legal department immediately. Do not engage with them directly unless advised by Legal. If you are asked to cooperate, you must always be completely truthful, as providing false information is a serious crime with severe consequences.

- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest**
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts

# Conflicts of interest

As a Geotab employee, you are expected to navigate personal and professional relationships with care to prevent any conflicts of interest, whether real or perceived. A conflict of interest arises when personal or professional interests could compromise, or appear to compromise, your ability to make objective decisions in Geotab’s best interest.

Your primary professional obligation is to Geotab. You are **prohibited from working for or advising any Geotab competitor or Partner in a personal capacity**. Furthermore, all other outside employment (also known as “moonlighting”) must receive **prior written approval from your manager and HR Business Partner**.

If you encounter or become aware of a conflict of interest, or any situation that appears to be one, please promptly disclose it to your manager, **People Operations**, or the **Compliance department**.

## What if...?

**A neighbor’s daughter will be home from college for the summer and is looking for employment. Can I recommend her for a paid internship in our organization?**



Yes, if you are not responsible for the hiring decision. Submit a referral, be sure to explain your connection and freely share your knowledge of your neighbor’s daughter. For more details on how to submit a referral, see [Geotab’s Referral Program](#).

## Recognize potential conflicts of interest

**A conflict can occur when:**

- An employee supervises or conducts business with someone with whom they have a close personal relationship.
- An employee invests in one of our suppliers, partners, or competitors.
- An employee owns or performs work for a company that competes or does business with Geotab.
- An employee participates in an external interview or research related to Geotab products or services.

This list does not cover all potential scenarios. If you are unsure whether a situation represents a conflict, contact the Compliance or People Operations departments for guidance.

## Ethical use of company resources

At Geotab, we are all part of the same team. This means we do not take personal advantage of opportunities that arise from our work. Do not use company assets, information, or relationships for personal gain.

- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws**
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts

# Complying with competition laws

You are expected to be aware of and follow all competition laws in the countries where you operate. Ensure you read the **Global Competition Policy** for direction on how to comply with common competition laws. This is especially important if your work involves business activities that attract heightened scrutiny under these laws.

All business arrangements involving government contracts or subcontracts must be reviewed by the Legal department to ensure they comply with competition laws. If you have any questions about sales and marketing practices, please consult with your manager or Legal to ensure we remain compliant throughout the sales and procurement process.



## Do not engage in anti-competitive practices

- Do not engage in price-fixing
- Avoid market division or allocation
- Avoid manipulating the bidding process or artificially inflating prices
- Avoid tying arrangements
- Never offer misleading or inaccurate information about Geotab or its products or services
- Do not disparage a competitor's products or services
- Ensure new employees do not bring their former employers' confidential information to Geotab
- When dealing with international partners, be aware of local laws and regulations
- Do not take advantage of competitor information that was disclosed inadvertently
- Keep records of your attendance and interactions with competitors at trade shows and industry events
- Avoid any other topic that could be perceived as limiting competition

**Remember, restricting competition is against the law.**

- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws**
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts

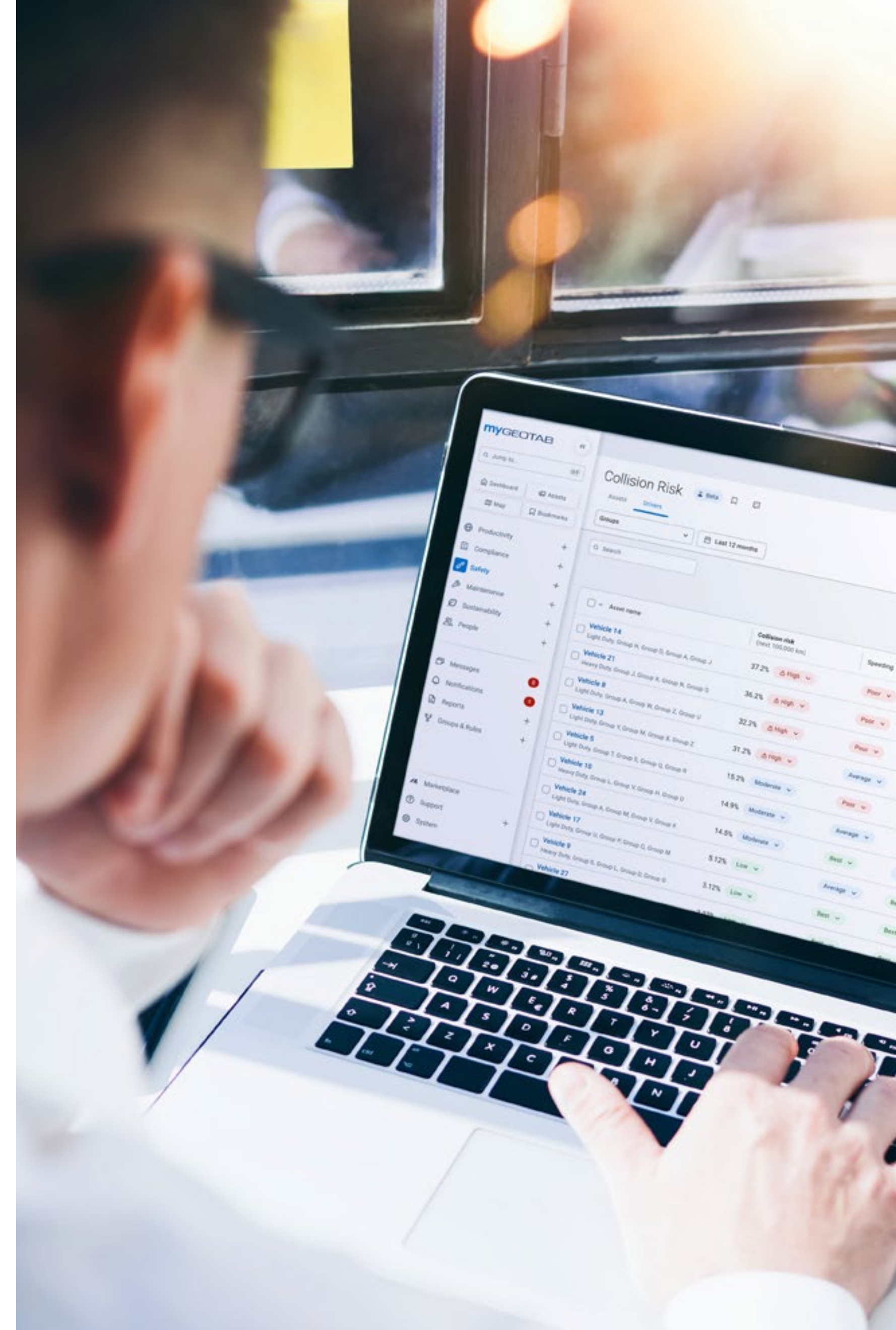
## Competitor and client employees

Hiring employees from Geotab’s competitors and clients (particularly government employees) can create a conflict of interest. Please seek guidance from your manager, **People Operations**, or Legal before approaching a competitor’s or client’s current or former employee about employment opportunities with Geotab.

## Handling competitively sensitive, confidential, and proprietary data

Gathering information about our competitors is an important part of our business and allows us to make decisions that benefit our customers. We are committed to gathering competitive intelligence legally and ethically. You must follow the **Global Competition Policy** and its guidelines for handling this information.

If you are uncertain whether Geotab has a legal right to possess or use any information you have received, do not distribute or use it until the question has been resolved by the Legal department. This includes sharing it in internal chat rooms, which may be considered distribution and a breach of policy. The only competitive intelligence you should act on is the official information provided by our Marketing team on “battle cards.”



- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption**
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts

# Anti-bribery and anti-corruption

Business courtesies, such as gifts and entertainment, can be a normal part of maintaining relationships with our customers, resellers, partners, and suppliers. However, even well-intentioned courtesies can be improper if they create the appearance of a “quid pro quo” expectation. You are not permitted to attempt to influence business decisions with anything other than objective value and performance.

Geotab has a **zero-tolerance approach to bribery and corruption**. You are **strictly prohibited from offering, giving, or receiving any bribe or kickback**.

## Bribes

A bribe is anything of value offered, promised, given, or received to **improperly influence a business decision or official act**. The core of a bribery violation is the intent to improperly influence someone.

## Facilitation payments

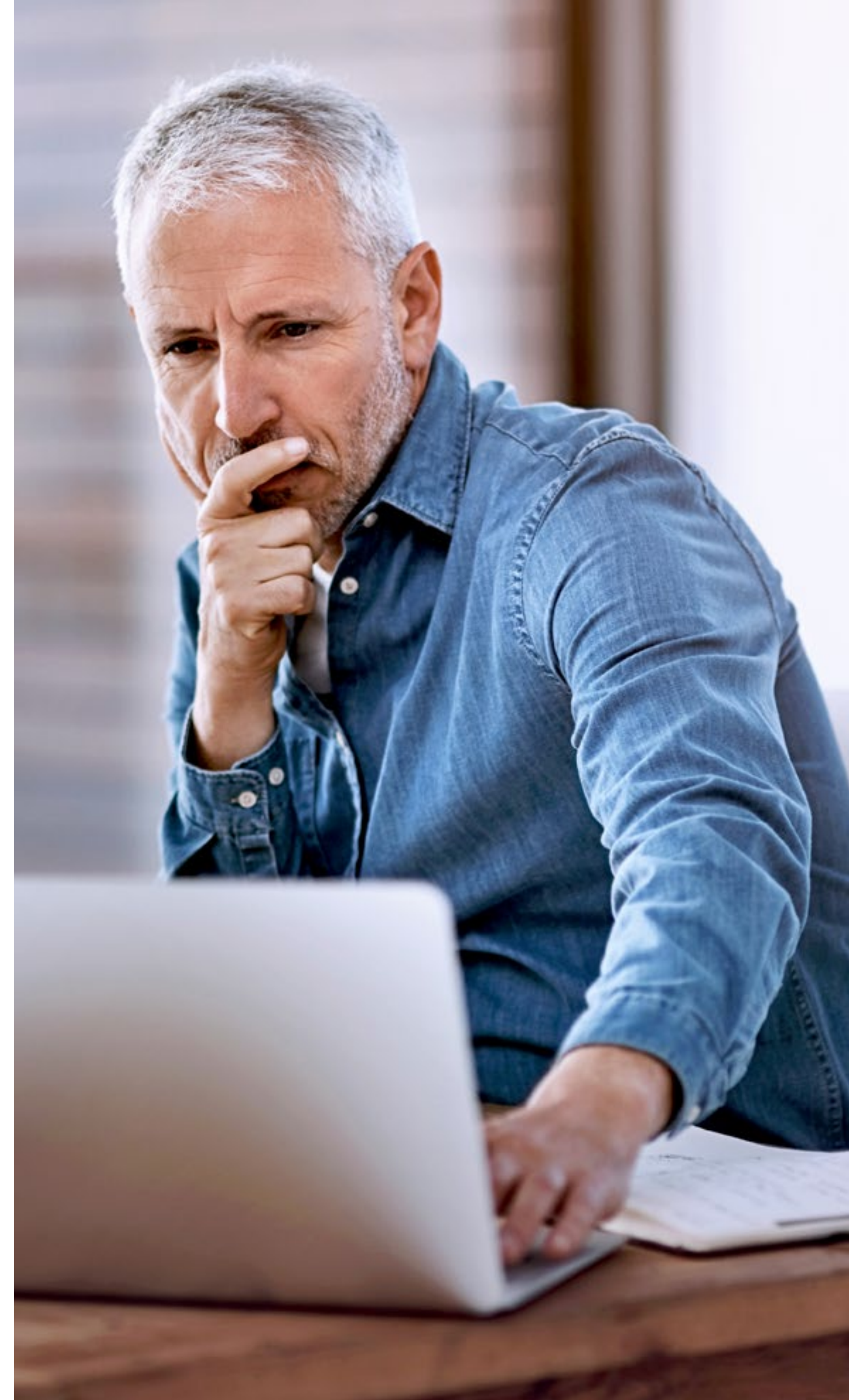
A facilitation payment is a small payment offered to expedite a routine government action. You are **strictly prohibited from making facilitation payments**. This practice is illegal and violates our policy.

### What if...?

**I successfully negotiate a particularly challenging deal with supplier X, and in gratitude, the supplier offers me a \$250 gift certificate to a local spa. Can I accept the gift certificate?**



No. You should politely refuse the gift certificate as it could be perceived as payment for closing the deal and it far exceeds threshold limits outlined in the Anti-Bribery and Anti-Corruption Policy.



- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption**
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts



## Kickbacks

A kickback is anything of value provided to a Geotab employee to improperly obtain or reward favorable treatment in connection with a contract. If you are unsure whether a practice constitutes a kickback, you must seek guidance from **Compliance** before proceeding.

## Foreign corruption

You must comply with all anti-corruption and anti-bribery laws when working with foreign officials. You may not provide money or valuables to foreign officials to help Geotab obtain or retain business or to expedite transactions. If you have any questions about doing business in a particular country, contact **Compliance** or consult the **Global Expansion team**.

## Gifts

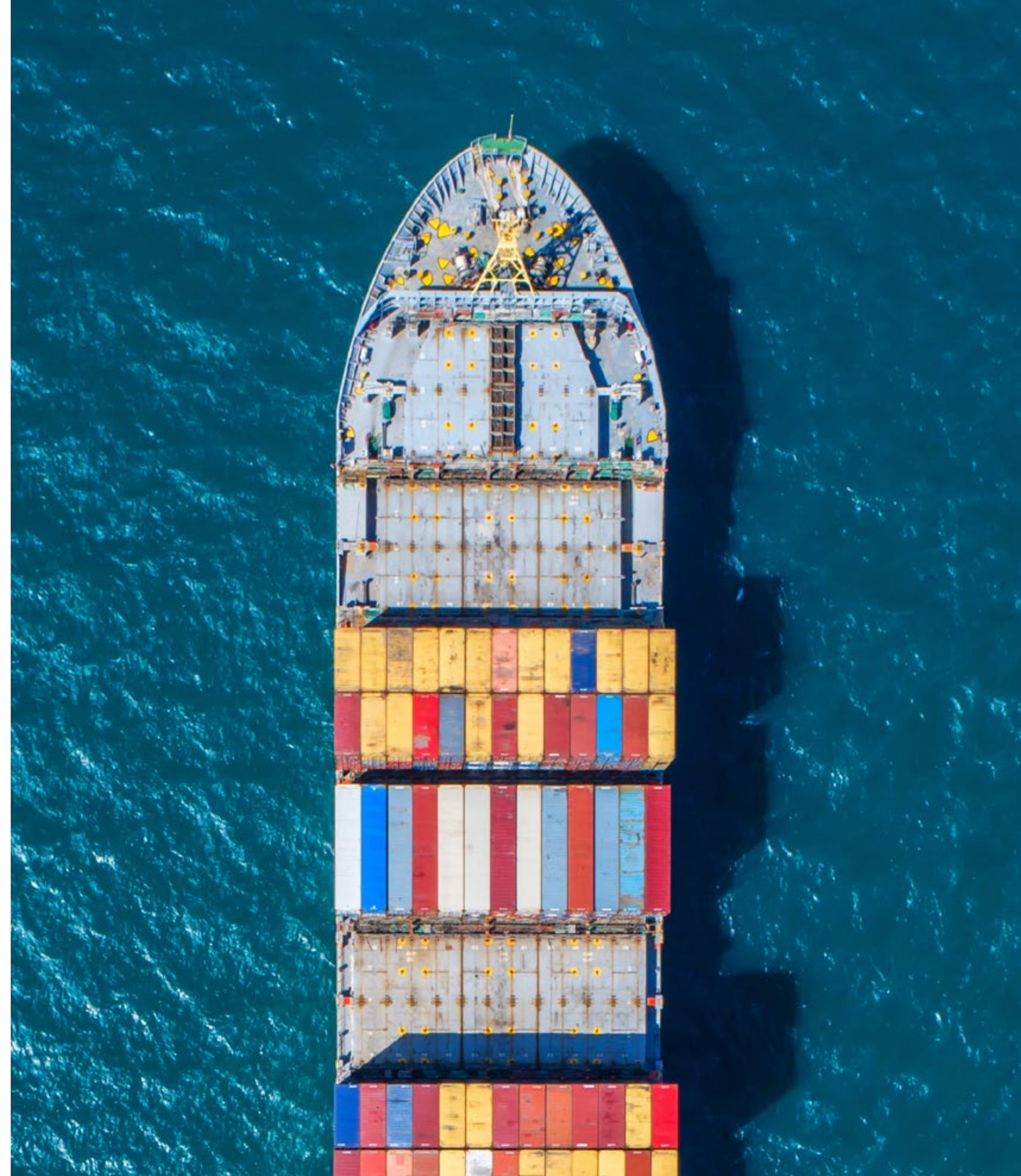
While the exchange of modest, occasional gifts is a normal part of business, you must **never give or receive cash or cash equivalents** (including gift cards). You must also **avoid travel, illegal items, or any courtesy intended to improperly influence a decision**. For specific monetary limits and rules, please see our Business Courtesies Guideline.

- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance**
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts

# Import, export & sanctions control

Operating in the global marketplace is an important part of our business, but it also introduces complexities and risks that we take very seriously. Export laws govern the transfer of goods and services across borders and must be strictly followed. Violating these laws can result in the loss of export privileges and significant criminal or civil penalties.

Geotab's **Sanctions Control Program** employs a risk-based approach to global trade compliance. As part of this program, we conduct regular risk assessments to ensure we comply with all legal requirements.



- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers**
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts

# Suppliers

We remain objective in our procurement decisions, using factors like technical characteristics, experience, quality, and best value. We are steadfastly impartial in all procurement for goods and services used to perform our commercial and government contracts. It is important to avoid both actual and perceived conflicts of interest. We have also developed a **Partner Code of Conduct** to ensure our partners, resellers, and suppliers share our commitment to ethical behavior.

## Supporting small, minority, women and disadvantaged businesses

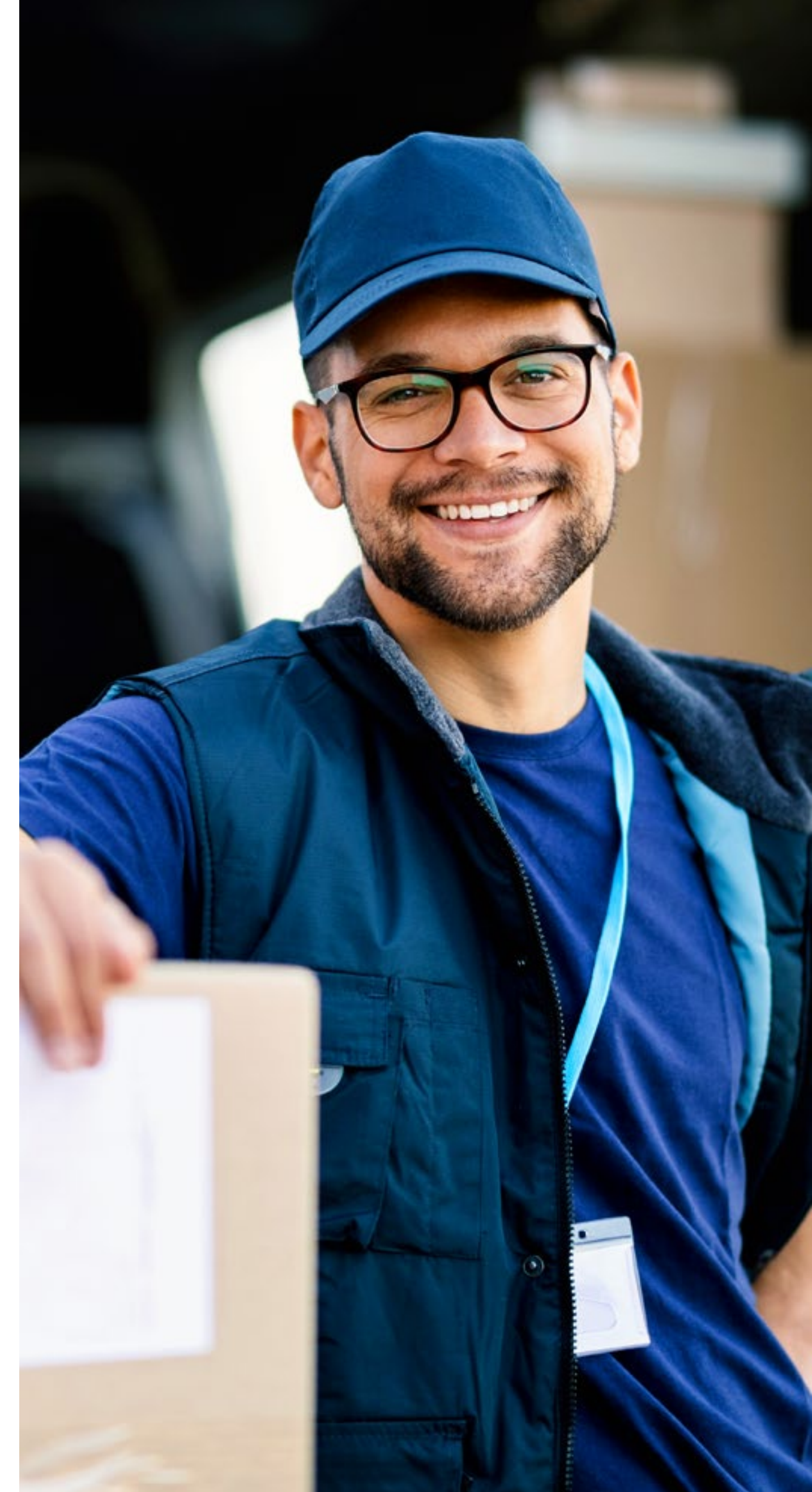
Geotab is committed to directing discretionary spending to small, minority-owned, women-owned, and disadvantaged businesses. This approach helps us meet increasing customer and government mandates, purchase locally, and support this vital part of the economy. When starting any purchasing activity, please contact the Small Business Liaison Officer for assistance in identifying qualified businesses that can help meet our objectives and customer expectations.

## Avoiding conflict minerals

Conflict minerals are associated with arms trafficking, indentured labor, and unethical mining practices. We aim to avoid doing business with companies that supply these minerals, and perform due diligence to determine the origin of these materials and expect our suppliers and partners to do the same.

## Suspended, debarred or otherwise ineligible suppliers

Geotab may not engage any company or individual that is suspended, debarred, or otherwise listed as ineligible for government contracts. This includes individuals who appear on any exclusionary list, including owners, directors or employees of a business. If you are responsible for establishing new supplier relationships, you must ensure they are properly vetted to prevent us from violating U.S. government contract requirements.



- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy**
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts

# Securing information, assets, and privacy

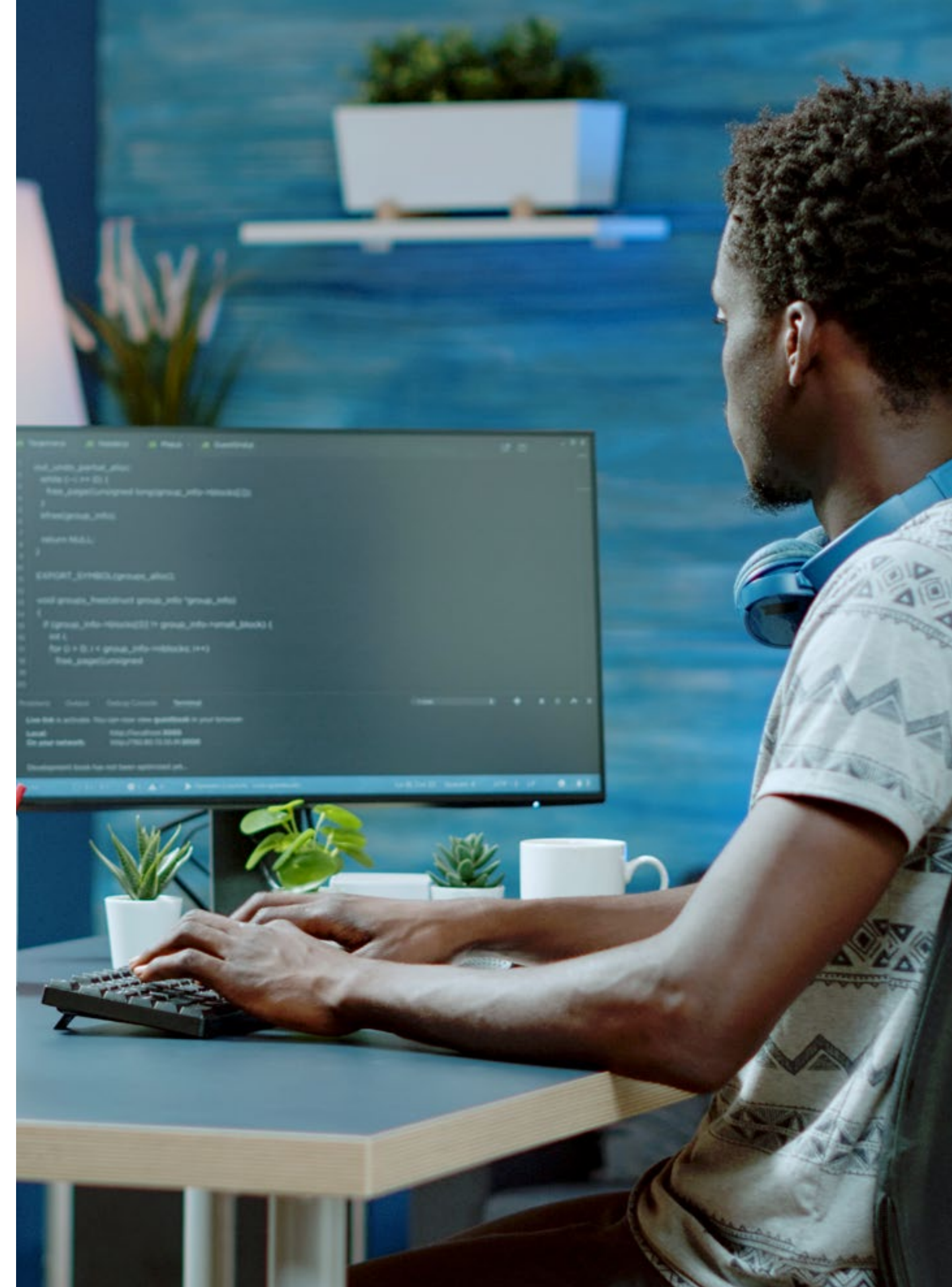
Everyone at Geotab is responsible for helping maintain a safe and secure workplace. This protects you, your colleagues, our property, and customer data. All Geotab locations are equipped with security cameras to ensure the security of our employees and assets.

## Geotab’s information security policies

You are required to read and acknowledge **Geotab’s Company Mandatory Security Review Program** annually. We provide computer devices, networks, and other electronic systems to help you perform your job functions, and everyone must manage them responsibly to maintain the confidentiality, integrity, and availability of our information assets.

All potential security breaches must be reported to the Security team. Please refer to the section titled “Security Incident Reporting” in the **Company Asset, Information and Data Security Policy** for more information, and the **Technical and Organizational Data Security Measures Statement (TOMS)** for a publicly-available overview of our data security measures.

We expect you to treat our data and systems with the highest respect—the same diligence you would use for your own personal information. Every Geotab employee has a critical responsibility to act as the first line of defense in protecting our company and its data infrastructure.



- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy**
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts

## Confidential and proprietary information

We have an obligation to protect and maintain the confidentiality of our company proprietary information and third-party proprietary information that has been entrusted to us. Improper access to, misuse, or disclosure of confidential business information could harm Geotab and our Partners. Never disclose confidential information to anyone outside Geotab unless authorized as part of your job. This obligation continues even after you leave the company. Confidential business information includes non-public sales and profit data, trade secrets, strategic business plans, customer lists, customer contacts, vendor lists, proprietary processes and technology, marketing plans and strategies, information on our customers' employees, and financial records.

Non-disclosure agreements (NDAs) must be reviewed and approved by the Legal department. If an NDA has been put in place with a Partner, breach of these agreements through the unauthorized disclosure or use of confidential information may result in significant monetary and reputational damages.

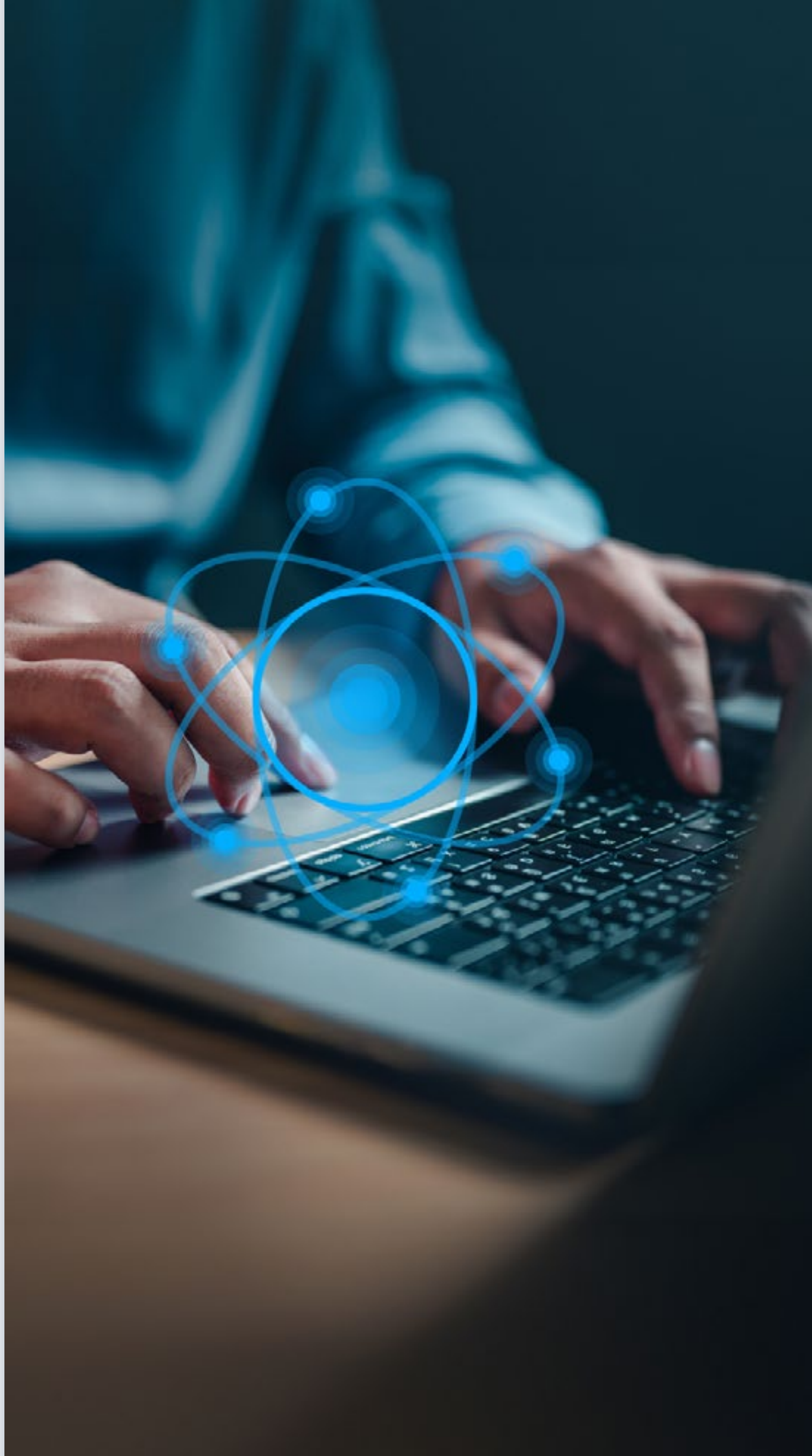
## Government data

As a government contractor, Geotab handles various types of data from governments and their third parties, which may include controlled unclassified information, personal, or other sensitive information. Protecting all customer data, including government data, is critically important. You must limit your access to only the systems and data necessary to perform your job and never attempt to access government data without authorization. You are responsible for knowing what restrictions apply to the data you handle and applying the appropriate levels of protection.

Do not access, accept, or use any government data if you suspect it was not properly delivered to Geotab until you can confirm that Geotab has the legal or contractual right to handle that data. Similarly, do not disclose government data externally unless you are certain the disclosure is permitted and proper protections are in place. If you receive or discover any government data that you suspect is improperly classified or has been sent to you by mistake, you must not access, use, or share it. Report the situation immediately to the [Legal department](#).



- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy**
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts



## Geotab's privacy standards

Personal data processed, collected, used, and/or disclosed to or by Geotab is handled only to establish and manage the client or employment relationship and to deliver the services for which it was provided. We will ensure that all personal data is kept confidential as required by applicable laws and our privacy standards. The way we handle your employee data is further detailed in our **HR Data Acceptable Use Policy**. You are required to review **Geotab's Privacy Policy, Product Privacy Notice**, and privacy training annually to ensure you understand how Geotab uses data. If you have questions, please contact the Privacy & AI Office.

## Ethical and responsible AI use

We encourage you to leverage Generative AI responsibly, in alignment with our core principles of trustworthiness, fairness, human oversight, and accountability.

Protecting company data is our highest priority. You are **STRICTLY PROHIBITED** from inputting any Company Confidential Information\* or Personal Data\* into Open Generative AI Models\* (e.g., public versions of ChatGPT). Only approved, Closed Generative AI Models\* may be used for business purposes, and you must always apply data minimization principles.

You are ultimately accountable for all AI-generated content. All output must be fact-checked for accuracy and reviewed for bias before use. Using AI for illegal, malicious, or harassing purposes is strictly forbidden. For full details, you must consult the **Geotab Responsible AI Policy** and the **Geotab Generative AI Policy**.

- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy**
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts

## Data analytics policy

Our internal **Data Analytics Policy** defines the essential principles for Data Analytics processes at Geotab to be implemented on a risk-prioritized basis. The public Data and Analytics Policy provides our customers with information about Geotab's creation and use of aggregated data, as well as the procedures that we put in place to ensure that access to this data is governed responsibly.

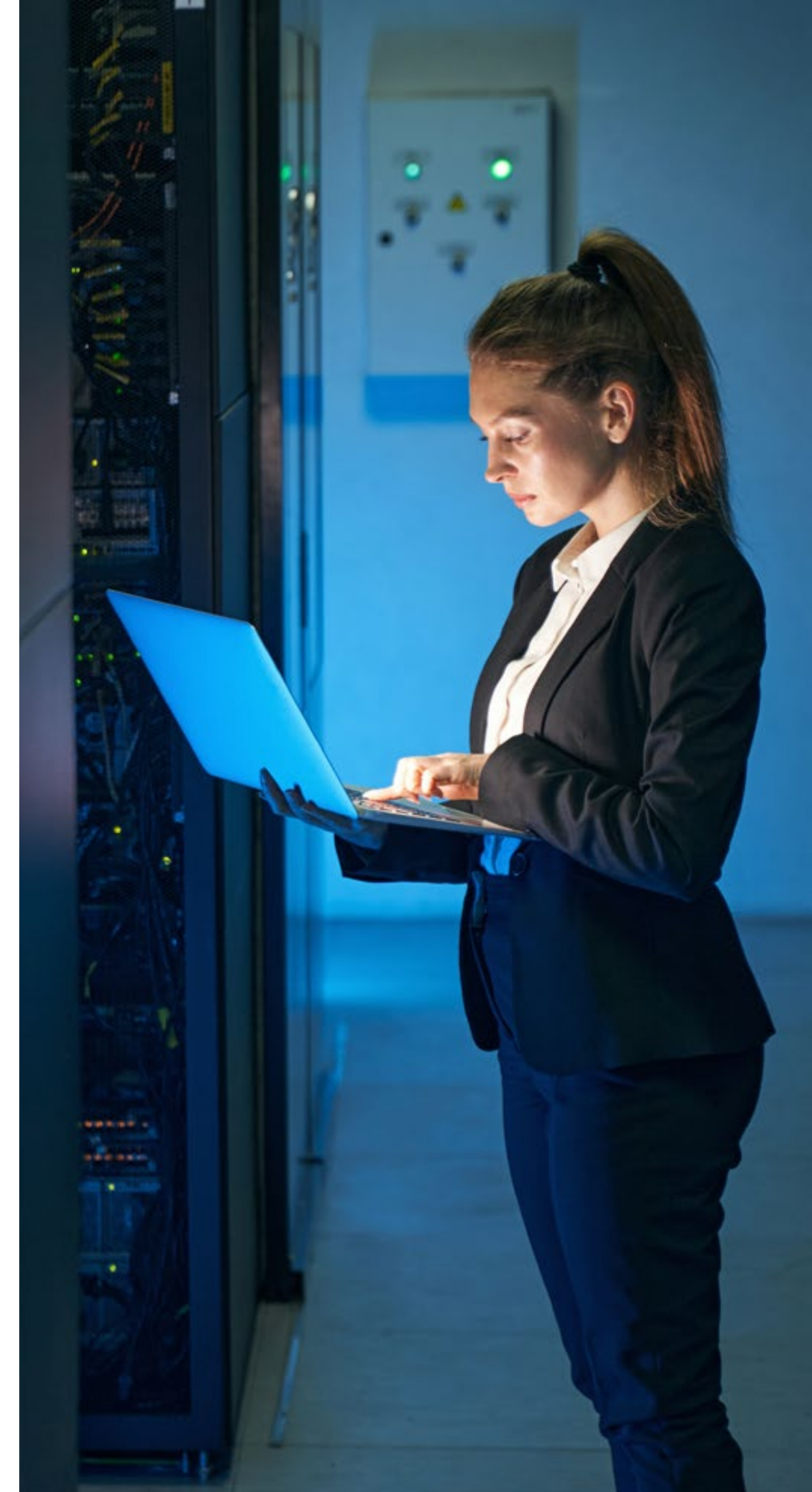
## Geotab's anti-spam policy

Geotab maintains a strict anti-spam policy. All promotional emails and templates must be sent through, or receive the approval of our Marketing Automation team. We prohibit the use of purchased contact lists for promotional communications, and follow all laws and regulations relating to commercial electronic messages in all regions in which we operate. You are required to read, understand, and adhere to the **Geotab Global Email Compliance Policy** to ensure we comply with all anti-spam and commercial email laws everywhere we operate.

## Product integrity and safety policy

We are committed to designing, manufacturing, and distributing our products with the highest level of integrity. The safety of our product users, our employees, and the public is a top priority.

All employees share a responsibility to uphold the quality and safety standards that define our products and services.



- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy**
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts



## Use good judgment

- **Cybersecurity:** We are committed to maintaining compliance with all statutory and regulatory cybersecurity requirements for the management of electronic information. If you work with restricted information, such as government data, you are also responsible for understanding any additional protection requirements.
- **Phishing:** Recognize phishing attempts and use caution before clicking links or taking action on an email. Only provide your credentials for a legitimate reason. Ensure your security training is up to date and follow all security policies. When in doubt, reach out to the Security team.
- **Access Control:** You are responsible for protecting Geotab data and limiting unauthorized access to company, customer, and employee data. Do not share your credentials with anyone.
- **Company Property:** Exercise care in the use of company equipment and property, and use it only for authorized purposes. Negligence in the care or use of Company property may be considered grounds for corrective action, up to and including termination. Immediately report any loss, damage, or theft of company property.
- **Monitoring:** You may be required to run monitoring software on your Geotab devices, especially when working remotely.
- **Internet Use:** Geotab's internet access is principally for work-related purposes. Unauthorized use is prohibited. This includes posting, viewing, downloading, receiving, or transmitting material that is malicious, pornographic, sexually explicit, inflammatory, racist, or discriminatory. Engaging in malicious or illegal hacking, attempting to disable or compromise information security, or accessing the dark web is also prohibited.

- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication**
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts



# Responsible communication

Chat messages and emails sent for business purposes should be treated like all other business communications. Maliciously false, threatening, discriminatory, or unlawfully harassing messages are prohibited. Messages containing confidential or proprietary information must be treated as confidential. You must not provide email access to an unauthorized person or access another user's email without authorization. Please be aware that the existence of passwords and "message delete" functions do not restrict or eliminate Geotab's authority to access electronic communications on its systems.

In all forms of communication, treat others with respect and empathy. Engage with curiosity and lead with questions rather than making statements that could be unintentionally offensive. Never be malicious or inappropriate in your interactions with colleagues or other visitors to a Geotab call or facility



## Chat rooms

Chat rooms are an important part of our culture and a way to stay up to date and connected with other Geotabbers. While participating in chat room discussions, it is essential that you be respectful and mindful of security and confidentiality obligations.



## Email

Our email system is primarily for business communications. Personal use is permitted during non-working time as long as it aligns with our policies, including our policies on discrimination, harassment, and protection of confidential information. The email system should not be used for personal business ventures or religious solicitation.

- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication**
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts



## Social media

We encourage you to share your passion for your work. If you discuss Geotab on social media, please follow these guidelines:

- Disclose that you are a Geotab employee.
- Make it clear that you are sharing your own opinions, not speaking on behalf of the company, unless you are an approved spokesperson by Geotab’s **Strategic Communications team**.
- If an opportunity to speak with the media on behalf of Geotab arises, you must first consult with the **Strategic Communications team** as outlined in the Media Relations Policy.
- Do not release information on behalf of Geotab or speak on behalf of Geotab with media reporters or industry analysts unless you are an official spokesperson. Seek guidance from the **Strategic Communications team** regarding official spokespeople.
- Never share competitive, confidential, or proprietary information about the company, our customers, our Partners, or others who do business with Geotab. Do not post sensitive information online, including work-related legal matters, future products, financial information, or the names of clients, Partners, or Suppliers.
- Do not respond to posts that are critical of Geotab. Instead, engage the **Strategic Communications team** to ensure concerns are addressed properly.



- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication**
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts



## Lobbying

Lobbying is any attempt to influence government action. Only Geotab's Government Affairs department is authorized to direct or engage in lobbying activities. If you are concerned your actions might constitute lobbying, you must consult with the **Government Affairs Manager** BEFORE before you act to ensure Geotab remains compliant with lobbying laws.

## Political contributions

Geotab **strictly prohibits the use of company funds for contributions to political campaigns, parties, or candidates**, and will not use its funds to make political contributions to political parties or candidates in any country, even if permitted by local laws. We respect your right to contribute personal funds and time to the causes of your choice, but you must do so in a personal capacity and on your own time, and must not use Geotab's name to convey or suggest that your activities are supported by Geotab. It is also your responsibility to ensure that all personal political contributions are in accordance with applicable laws.

If you have any questions about political contributions or supporting political candidates, you must consult with **Compliance**.

- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights**
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts

# Commitment to ethical work practices and human rights

Geotab is committed to fair labor practices, including paying living wages, offering adequate benefits, and providing safe workplaces. We also insist that our suppliers and partners engage in fair labor practices.

## Human rights

We respect guiding Canadian, U.S., United Nations, and international principles on human rights and are committed to conducting our business in a manner consistent with them. We support and respect internationally proclaimed human rights and are never complicit in human rights abuses, and we expect the same from our Partners and Suppliers.

## Modern slavery/human trafficking

Geotab supports the elimination of all forms of forced, bonded, or compulsory labor and promotes the freedom of association where practical and legal. We condemn all forms of child exploitation and do not use child labor. We insist that our Partners and Suppliers not engage in any form of modern slavery. We cooperate with law enforcement authorities on all matters related to prohibiting and prosecuting any form of modern slavery.

- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights**
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts

## Diversity, equity and inclusion

Geotab is committed to sustaining a globally diverse, equitable, and inclusive culture where different perspectives drive innovative solutions. Our diverse Employee Resource Groups focuses on awareness, research, and community partnerships. We believe diversity is fundamental to our future growth and success. You will be treated as an individual based on your ability to meet job requirements, without regard to protected factors such as race, sex, color, sexual orientation, age, disability, family status or marital status, creed, or any other factor that is legislatively protected within the location where you work. Discrimination or harassment is strictly prohibited.

## Drugs, alcohol, and substance abuse in the workplace

Geotab prohibits impairment from drugs or alcohol in the workplace or during work hours, regardless of whether you are on company premises or working remotely. You may not remain at the workplace if your ability to perform your job is affected by any substance or if your health or safety is endangered. If you are required to use prescription medication, it must not inhibit your ability to proficiently and safely perform your job duties. This extends to after-hours company events, where you are expected to represent the company professionally. Smoking or vaping during video calls is considered unprofessional and is not permitted, regardless of the legality of the practice.



- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights**
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts



## Safe workplace

We are committed to maintaining a safe, healthy, and violence-free workplace. Geotab strictly forbids and will not tolerate any form of workplace violence, and will take all reasonable steps to protect employees from workplace violence and domestic violence in the workplace, from all sources. Weapons are strictly prohibited from company premises in accordance with local laws.

Everyone is entitled to a violence-free workplace where they are treated with dignity and respect. To uphold this principle, Geotab has established a formal **Geotab Workplace Harassment Policy** and **Workplace Violence Policy**. You are required to complete the necessary training, acknowledge your understanding, and comply with these policies.

We take all complaints of ethics violations, harassment, discrimination, and violence seriously. If you observe any incident that threatens workplace health, safety, or respect, please refer to the [How to Speak Up](#) section of this Code for reporting guidance.

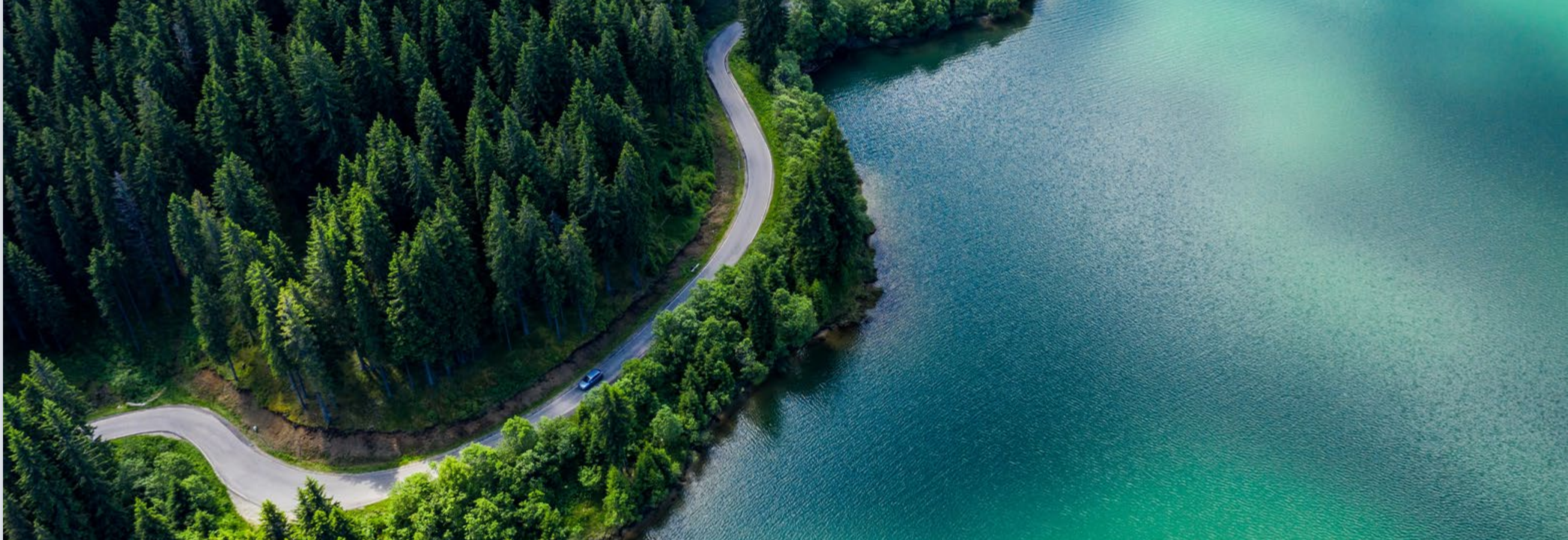
### What if...?

**My manager recently promoted a co-worker to a position that we both applied for. When I asked why I wasn't chosen for the position, she told me that it was because she knew that I had inquired about parental leave policies, and she couldn't afford to put me in that position knowing that I might be going on maternity leave in the future. Is this discrimination?**



Yes, promotions must be based only on an employee's performance and cannot be affected by a person's family status or future family plans. You should report this to People Operations.

- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact**
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts



## Environmental impact

Our telematics solutions help customers minimize their environmental footprint, and we are committed to promoting sustainability and environmental awareness at all levels within our company.

You must work to minimize any negative environmental impacts in all your decisions and actions. Our green initiatives measure our current carbon footprint and implement measures to reduce our impact. If you need help developing sustainability targets for your departmental processes or outputs, please contact the Sustainability team.

- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct**
- 16 Acknowledgment
- 17 Links
- 18 Contacts

# Employee conduct

The success of our business depends on maintaining a professional atmosphere, which is affected by the image you project and your business conduct. These guidelines outline the minimum standards for your daily conduct, relationships, and business dealings. You are expected to use your best judgment to make the right decisions, always in a manner consistent with the policies in this Code, which includes being punctual, responsible, and committed. We are committed to maintaining a secure and productive work environment in which everyone is treated with fairness and respect. Use your best judgement to guide you to the right decision.

## Off-duty conduct

We generally consider your time away from work to be private. However, off-duty conduct can become a work-related matter if it

- Harms the company's reputation or products;
- Renders you unable to perform your job or any part of your job effectively
- Makes others reluctant to work with you;
- Involves a serious breach of the law; or
- Makes it difficult for the Geotab to manage its operations and/or direct its workforce efficiently.

Such conduct will be subject to discipline up to and including termination. Off-duty conduct can refer to in-person or online conduct.



- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment**
- 17 Links
- 18 Contacts

# Acknowledgment

You are required to acknowledge that you have received and understand this Code of Conduct.

In your acknowledgment, you will agree that you:

- Have received a copy of the Code in electronic form;
- Have read, understand, and agree to abide strictly and fully by the Code;
- Will annually reaffirm your commitment to adhere to the Code by completing the electronic acknowledgement form;
- Will direct any questions about the Code to your supervisor or the Compliance or Legal departments.
- Will report any suspected improper conduct under the Code to your supervisor, the Compliance department, the Legal department, your HRBP or the Integrity Helpline.

Failure to acknowledge or comply with the Code may result in disciplinary action, up to and including the termination of your employment.



- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links**
- 18 Contacts



# Links

All global policies linked in this document can be accessed through the Compliance Site.

[Partner Code of Conduct](#)

[Modern Slavery Statement](#)

[Environmental Code of Conduct statement](#)

- 01 Guiding principles of ethics and business conduct
- 02 Making the right choice
- 03 How to speak up
- 04 Speak without fear of retaliation
- 05 Handling external inquiries & government investigations
- 06 Conflicts of interest
- 07 Complying with competition laws
- 08 Anti-bribery and anti-corruption
- 09 Import and export compliance
- 10 Suppliers
- 11 Securing information, assets, and privacy
- 12 Responsible communication
- 13 Commitment to ethical work practices and human rights
- 14 Environmental impact
- 15 Employee conduct
- 16 Acknowledgment
- 17 Links
- 18 Contacts**

# Contacts

## Compliance

### Compliance Service Desk

### HR Business Partner

### People Operations

### Legal

### Global Expansion Team



GEOTAB®

[in](#) [X](#) [f](#) [▶](#) [🎧](#) | [geotab.com](https://geotab.com)