

Geotab code of conduct

Do the right thing.



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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 2,000 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 20 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 and with a much greater diversity of partners. We must know what is expected and we must act accordingly. This is why having a well-documented code of conduct and proper 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



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Guiding principles of ethics and business conduct

Purpose

Our Code of Conduct is a reflection of our ethics and our values. The purpose of the Code is to define and provide guidance with respect to our ethical practices and business conduct. Ethics and integrity are at the core of who we are and guides our decisions at every level. The Code is designed not only to prevent illegal conduct and the appearance of improper behavior on the part of Geotab or its employees; it is designed to preserve the reputation of Geotab and ensure the highest standards in ethical conduct are upheld.

Geotab sells its products and services to commercial and government entities around the world who, in turn, may resell Geotab products and services to commercial or government customers. It is imperative that employees adhere to Geotab’s core values, and ensure that you do things with integrity. Employees must understand and follow all applicable laws and regulations of the region in which they are doing business. Geotab aims to make employees aware of these via policies, WIKIs and/or training materials when pertinent to Geotab in any region in which our products may be resold or consumed.



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Ethics

Integrity is the foundation of all of Geotab’s relationships. We do business fairly, impartially, and ethically. Our **Core Values** help guide our behaviors and business decisions, and we strive to exhibit these values in everything we do. We show our commitment to integrity through our actions and behavior and encourage a culture of compliance by demonstrating and promoting ethical business conduct at all times and in all circumstances.

Geotab commits to:

- Comply with all applicable laws, regulations, rules, codes and standards everywhere we operate;
- Conduct internal and external business fairly and ethically;
- Interact respectfully and responsibly with each other, our customers, our business partners and our host communities; and
- Maintain the highest standards of integrity and ethical business conduct in all aspects of our interactions with commercial and government customers around the world.

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All Employees

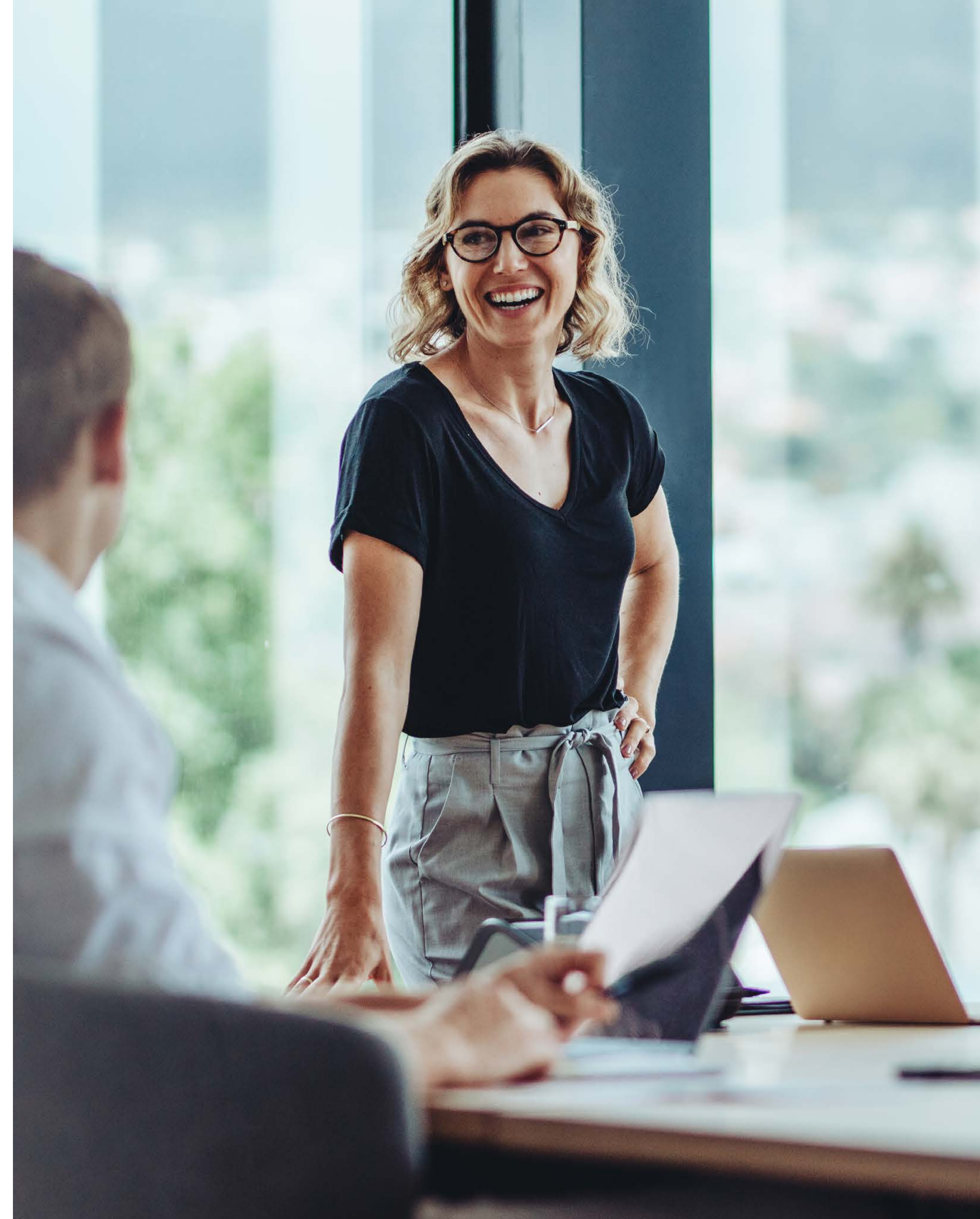
Compliance to the Code of Conduct is everyone’s responsibility. Geotab expects each employee to act with the highest level of integrity and ethical business conduct whenever performing their work or acting on behalf of Geotab.

Managers

Managers must at all times demonstrate their commitment to integrity through their actions and behavior and promote ethical business conduct among their staff and colleagues. This means keeping an open door, fostering open and honest communication about ethics and integrity, and encouraging employees, colleagues, and management to speak up if they see something that doesn’t feel right. Managers are also responsible for ensuring that their employees are aware of and have completed the Geotab annual Code of Conduct attestations and the annual Ethics and Compliance Training.

Geotab ethics in action

Geotab recognizes that acting ethically and doing the right thing takes courage and integrity. To recognize employees whose actions demonstrate a commitment to our culture of ethics and compliance, we are implementing an “Ethics in Action” program. Employees who use the reporting system to ask for advice on a difficult compliance question, identify a vulnerability in a compliance control system, or suggest a way to improve compliance training, will be eligible for rewards and recognition. Rewards will be implemented for making recommendations and suggestions to improve the compliance & ethics program.



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Resources

Geotab expects each of its employees to ask questions, seek guidance, express concerns, and report any suspected violation of the Code, company policy, or violation of the law or regulation. To enable this, Geotab employees should feel free to engage any level of management to report an issue, discuss how to manage issues, and to enlighten the necessary people that misconduct may be present.

While we encourage and hope that our employees use the methods of reporting made available to them to address issues within the company itself, employees are not prohibited from contacting government agencies to report suspected violations of law or participating in government investigations. Employees are not required to notify Geotab prior to filing a report with a government agency.



Geotab’s Integrity Helpline is always available to all Geotab employees. Geotab is committed to promoting a culture of integrity, collaboration and transparency for our employees and clients. It is also critical that we safeguard our business against risk. All Geotab employees have access to a **confidential and anonymous reporting system**, where they can submit information about activities such as workplace theft, fraud, bribery or actions that lack alignment with Geotab’s values. Employees can submit a **report online here** – with no username or password needed. Employees can also speak to someone over the phone in over 150 languages. If you have any questions, please contact Compliance.

All reports will be handled with strict confidentiality (to the extent possible considering applicable legal constraints). Reporters may remain anonymous, although, in some cases, this might make it more difficult to follow up and ensure resolution of a report. Please let the person taking the report know if you want to remain anonymous.

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Reporting guidelines – whistleblowing

Geotab has a zero tolerance policy against retaliation for reporting ethical concerns or violations. We are committed to the highest possible standards of openness, honesty, transparency and accountability and strive to always act with high ethical standards. In line with this commitment, we encourage employees and others that we deal with who have serious concerns about any aspect of Geotab to come forward and voice those concerns. Under no circumstance should any employee be subject to any disciplinary or retaliatory action for filing a good faith report of a suspected or actual ethics violation by managers or colleagues.

Scenario

I want to report an ethics issue but I am wary of repercussions in my work group if anyone finds out. To be safe, isn't it best to report the issue anonymously to the Integrity Helpline?



While you can certainly remain anonymous, it is much easier for the company to conduct an investigation when employees identify themselves. Investigators can more easily ask follow-up questions to obtain any missing data, and the case may be resolved more quickly. **If you choose to remain anonymous, you would need to log back in to see and reply to questions relating to the report.** Our company guarantees that no one who reports an issue in good faith -- or who is interviewed about a case -- will be retaliated against.



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Audits and investigations

Geotab has contracts with various government entities and significantly large companies in multiple countries, which places us under increased scrutiny and subjects us to stricter rules and regulations in regard to compliance. Geotab is required to report issues of non-compliance with applicable laws and regulations to the government entities with which we are doing business, as required by applicable law.

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Conflicts of interest

Geotab employees must avoid actual or apparent conflicts of interest between personal and professional relationships. A conflict of interest occurs when a Geotab employee has a private or financial interest that would reasonably be expected to interfere with the Geotab employee’s ability to perform their job duties effectively and objectively.

A personal conflict of interest arises when you, a member of your family, or a close personal relationship are involved in an activity or have a personal interest that competes with Geotab’s interests, which could affect your objectivity in making decisions at work. Any employee involved in a romantic or familial relationship with a manager, supervisor, or fellow employee should immediately and fully disclose the relevant circumstances to the Human Resources department so that a determination may be made as to whether the relationship presents an actual or potential conflict of interest.



Recognize potential conflicts of interest



A conflict can happen when:

- An employee supervises or conducts business with someone with whom they have a close personal or familial relationship.
- An employee invests in one of our suppliers, partners or competitors.
- An employee owns or does work for a company that competes or does business with Geotab.

This list does not cover all potential scenarios, if you’re not sure if a situation represents a conflict, contact Compliance or HR.

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Personal gain

Geotab employees must never use any assets, information, or relationships of Geotab for personal gain.

Competitor & client employees

Hiring the employees of Geotab's competitors and clients (particularly government) can also create a conflict of interest. Employees should seek guidance from a manager, Human Resources or Compliance before approaching a competitor's or client's current or former employee about employment with Geotab.

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Fair competition

Geotab offers its customers innovative, quality products and services at competitive prices. Geotab is committed to providing customers with accurate information and believes that a fair and open market benefits both Geotab and our customers. Employees are expected to observe general principles of good faith and fair dealing in all business transactions.

Geotab is committed to fair competition, ethical business practices, and compliance with applicable antitrust and competition laws. Geotab expects its employees and Partners to act in accordance with applicable antitrust and competition laws. Here are examples of generally **prohibited** anti-competitive practices. **Employees and Partners must NOT engage in:**

1. **Price-Fixing:** Do **NOT** engage with competitors around pricing.
2. **Market Division or Allocation:** Do **NOT** engage with competitors to divide markets, territories, or customers.
3. **Bid-Rigging:** Do **NOT** engage with competitors to manipulate bidding processes or artificially inflate prices.
4. **Tying Arrangements:** Do **NOT** require partners to purchase unrelated products or services as a condition for acquiring another product or service.

In addition, Geotab and each of its Partners are responsible for understanding their respective obligations under applicable antitrust and competition laws and abiding by those obligations. All business arrangements involving government contracts or subcontracts must be reviewed by Legal to ensure they comply with antitrust and competition laws.



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Business courtesies

It is imperative that Geotab’s transactions remain free from the perception that favorable treatment was sought through a business courtesy. Business Courtesies are gifts or entertainment exchanged with the express purpose of maintaining amiable relationships with Geotab’s Customers, Resellers, Partners and Suppliers and are viewed as a normal part of doing business. However, even well-intentioned business courtesies can be improper if they give the appearance of quid pro quo expectations. Geotab employees are not permitted to attempt to influence business decisions based on anything other than objective value and performance criteria. Geotab employees are prohibited from giving or accepting a bribe or kickback that creates a sense of obligation or creates an appearance of impropriety.

Kickbacks

A “kickback” is anything of value provided to any Geotab employees for the purpose of improperly obtaining or rewarding favorable treatment in connection with a contract or subcontract. Receiving kickbacks is never appropriate and is strictly prohibited.

Foreign corruption

Geotab employees are prohibited from offering or giving money or anything else of value to foreign officials to assist Geotab in obtaining or retaining business or for the purposes of expediting transactions in a foreign country (known more generally as facilitation payments). Bribery and other forms of corruption are illegal and prohibited when dealing with foreign governments and their representatives.

Scenario

Ann helped a customer through a very complex problem and in the end, all was resolved very satisfactorily. The customer showed appreciation with a thank-you card and a \$100 gift certificate to a local restaurant. Can Ann keep the gift certificate?

 No. A gift certificate is a cash equivalent and must be politely returned.

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Financial matters

Customers often ask Geotab to provide financial information, create financial data, structure its financial data in certain ways, or adopt certain accounting practices.

Employees may not provide a third party, including a commercial or government customer, any financial data, including price or cost information or any information about Geotab's financial or accounting systems, without the prior written approval of the Chief Financial Officer or their designate.

Lobbying

Lobbying is any attempt to influence government action through oral or written communication with legislators, regulators or their staff. Geotab has a Government Affairs department whose sole purpose is to ensure adequate representation with approved trade associations to ensure it has the capability of complying with emerging legislation in the US and elsewhere. Other Geotab departments are restricted from engaging in or hiring anyone to engage in lobbying on behalf of Geotab.

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Political contributions

Geotab takes a very cautious approach to politics of any kind in any location. Contributions to political campaigns made from Geotab funds are strictly prohibited. Geotab will not use its funds to make political contributions to political parties or candidates in any country, even if such contributions are permitted by that country's laws.

Geotab respects and supports its employees' rights to contribute personal funds and personal time to support the candidates and causes of their choice. It is the employee's responsibility to conduct such activities in a personal capacity, on their own time and not to use Geotab's name to convey or suggest that Geotab supports their activities. It is also the employee's responsibility to ensure that all personal political contributions are in accordance with applicable laws.



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Export and import compliance

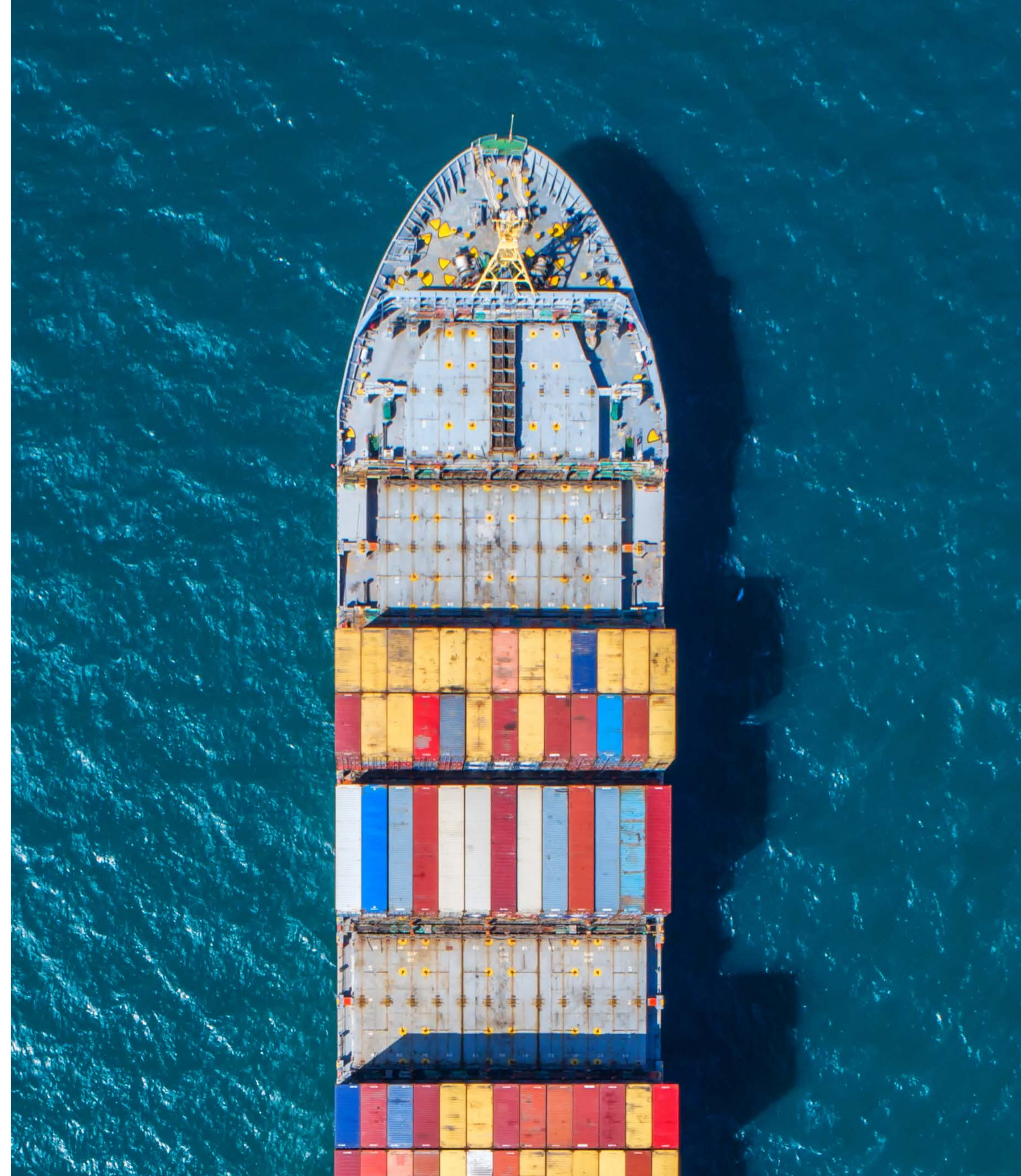
International business

Seeking out opportunities in the global marketplace is an important aspect of Geotab's business. Doing business throughout the world adds multiple levels of complexity and risk about which Geotab remains aware and concerned. Export laws can affect the transfer of goods or services across country borders. Violating these laws and regulations could result in the loss of export privileges or in criminal or civil penalties.

It is Geotab's policy to learn about, understand, and comply with the host of legal requirements connected with doing international business. The import and export of products, software, data, services, and technologies must comply with all applicable import and export laws and regulations. All exports and sales transactions are subject to inspection by the Global Trade Enablement Program at Geotab.

Global Trade Enablement

Geotab has established and maintains a Global Trade Enablement Program, which employs a risk-based approach to sanctions compliance. As part of this program, Geotab conducts regular, periodic risk assessments to determine compliance with all legal requirements.



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Suppliers

Geotab remains objective in its 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 conflicts of interest and appearances of partiality. Geotab has developed a **Partner Code of Conduct** to ensure that our expectations of upstanding and ethical behavior are shared and accessible to all of our partners, Resellers and suppliers.

Small, minority, and disadvantaged businesses diversity program

Geotab is committed to increasing our small, minority, and disadvantaged business services and supply chain as much as practicable and as would be consistent with the efficient performance of our business.

Conflict minerals

“Conflict minerals” refers to four raw materials: (1) columbite-tantalite, also known as coltan (from which tantalum is derived); (2) cassiterite (tin); and (3) wolframite (tungsten), collectively called the 3Ts; and (4) gold, or their derivatives. Geotab requires that partners only use “conflict-free” minerals. “Conflict-free” means that the company can prove that the 3Ts and gold in its products are not mined, sold, taxed, or otherwise used for the benefit of groups known for arms trafficking, the use of indentured labor and/or unethical mining practices.

Geotab does not do business with companies who engage in the use of conflict minerals. We will perform due diligence in determining the country of origin for materials known for being potentially conflict minerals and expect our suppliers and partners to do the same.

Suspended, debarred or otherwise ineligible suppliers

Geotab may not use any company that is suspended or debarred for use on government contracts. This includes individuals who appear on any exclusionary list, including owners, directors or employees of a business. Anyone at Geotab responsible for establishing relationships has an obligation under this code to ensure that the selected partners are vetted by Compliance and Legal to ensure Geotab does not inadvertently sign with a partner that would put it offside in U.S. government contract requirements.

Counterfeit parts & part substitutions

Geotab has procedures for detecting and preventing the use of counterfeit electronics parts in products sold directly or indirectly to customers. One of these controls is a strict policy of not allowing parts substitutions until they have undergone a rigorous internal approval process.

There are certain instances, such as with the U.S. government, in which the contract does not allow substitutions for any product, even if the substitution is for a superior product. To ensure that we comply with these contractual obligations, only items listed in the contract or the associated contract modification can be provided to these customers.

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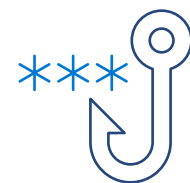
It is the responsibility of everyone to help maintain a safe and secure workplace environment to protect yourself, your co-workers, personal belongings, Geotab property, and visitors. All Geotab locations are equipped with security cameras to ensure the security of Geotab systems.

Geotab’s information security policies



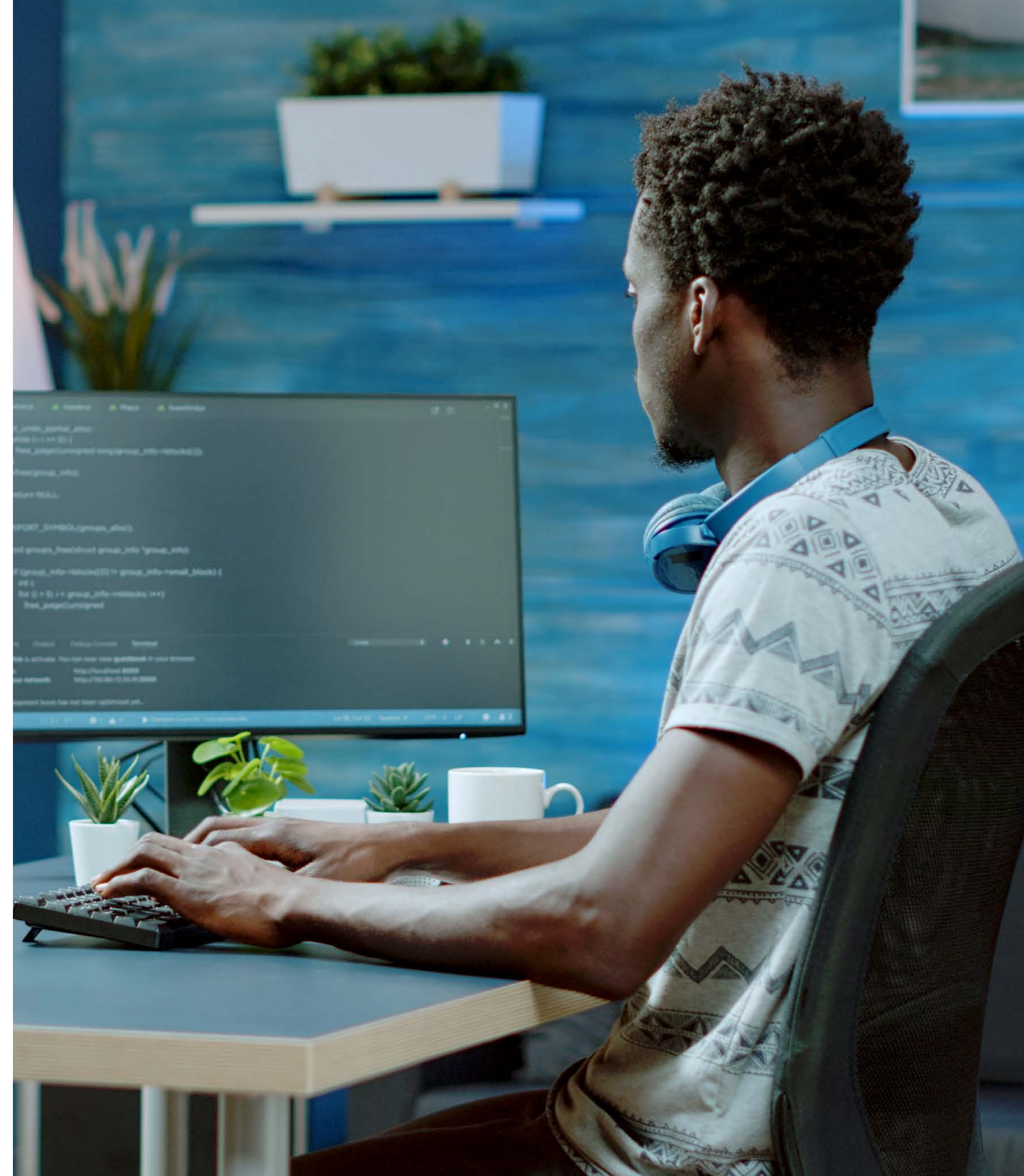
Cybersecurity

Just as Geotab is concerned about its own data, customers are increasingly concerned about protecting their critical data. Geotab is committed to complying with the various cybersecurity requirements for handling electronic data. Employees who work with government data are responsible for understanding any additional data protection requirements.



Geotab phishing policy

There are a number of signs in an email that could and should make you think twice before clicking on it. Hackers and spammers are getting very sophisticated and more and more people are falling for their schemes. It is everyone’s responsibility at Geotab to use common sense and to ensure that they only provide credentials and passwords for a legitimate reason.



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Geotab privacy standards

Personal information or personal data that is processed, collected, used, and/or disclosed by Geotab is done so only to establish and manage the client or employment relationship and to deliver the services for which it was commissioned to deliver. Geotab will ensure that personal data is kept confidential to the extent required by the applicable laws and Geotab’s privacy standards. Employees are required to review the [Geotab Privacy Policy](#) and complete the Geotab Privacy Training annually to ensure they understand how Geotab properly uses data.



Asset, information and data security

All employees are responsible for protecting Geotab data and limiting unauthorized access to company, customer and employee data. Employees are not permitted to share their credentials with anyone inside or outside of Geotab.



Data analytics policy

The purpose of the Data Analytics Policy document is to provide Geotab customers with information about Geotab’s creation and use of aggregated data and the procedures that Geotab has put in place to ensure that access to such data is governed responsibly. [The Geotab Data and Analytics Policy is linked here.](#)



Geotab’s anti-spam policy

Geotab has a strict policy against spamming. All promotional emails and templates must be sent through or with the approval of our Digital Marketing department. Geotab does not allow use of purchased contact lists to send out promotional electronic communications and follows all laws and regulations relating to commercial electronic messages in all regions in which we operate.



Records retention

Geotab employees must maintain accurate business records, in accordance with laws and regulations and contractual obligations.

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Product integrity and safety policy

Geotab provides sophisticated GPS/telematics based fleet management solutions that enable customers to track and manage fleet productivity, alert drivers to correct and improve their behavior, and help fleet managers to monitor and promote adherence to fleet driving standards. Geotab is a leader in innovation and strives to design, manufacture, and distribute all products with the goal of advancing safety for product users, our employees, and the public at large. [Click here to find the Product Integrity and Safety Policy.](#)

Information technology



Internet access

Geotab’s connection to the Internet is principally for work-related purposes. Any unauthorized use of the Internet is prohibited. Unauthorized uses include, but are not limited to, posting, viewing, downloading or otherwise receiving or transmitting maliciously false, pornographic or sexually explicit material; inflammatory or racist and discriminatory communications; accessing the dark web; engaging in malicious or illegal computer “hacking”; or attempting to disable or compromise the security of information on any computer.



Social media

Geotab believes in open communication and you are encouraged to tell the world about your work and share your passion. If employees choose to talk about their work with Geotab on social media, there are a few things they must adhere to:

- Disclose their employee affiliation.
- Make it clear that they are sharing their own thoughts and opinions and not speaking on behalf of Geotab unless they are an approved spokesperson.
- Remember, the internet never forgets, so if they are even slightly uncomfortable with something they are about to post, talk to a manager first.
- Do not post sensitive information online, including work-related legal matters, future products, financial information or names of clients, partners or suppliers.
- Do not respond to posts critical of Geotab products and services; leave that to the Marketing team.

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Sales integrity

Geotab will not seek or use any bid or proposal information to which Geotab is not legitimately entitled. If you are uncertain whether Geotab has a legal right to possess or use any information you may have received or gained access to, do not distribute or use the information until the question has been reviewed and resolved by the VP of Compliance. This includes sharing on internal chat rooms. If we have information we may not have the legal right to possess, inquiring about the legitimacy of the data on a chat room would be considered distribution, and a security breach.

Do not use or distribute information that Geotab does not have a legal right to possess.

Confidential and proprietary information

Improper access to, misuse, or disclosure of confidential business information and materials could bring harm to Geotab and/or its partners. Never disclose confidential information or materials to anyone outside of Geotab except as specifically authorized in the course of your employment. Geotab partnerships must be treated as confidential and should not be disclosed to third parties, including other Geotab Partners. These obligations continue even after you leave Geotab.



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Government data

As a government contractor, Geotab receives data from various governments that include not only the government data, but often also includes data from third parties that governments have a right to disclose. Employees are responsible for knowing the contractual obligations Geotab has assumed in relation to data received from government contracts and for understanding the protection requirements and treating the information accordingly.

Employees must not accept or use any government data that they suspect may not have been properly delivered to Geotab, until they are certain Geotab has the legal or contractual right to access or use the data. In addition, do not disclose government data outside Geotab until you are certain that the proper protections are in place.

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Diversity, equity and inclusion

Geotab is committed to sustain a global diverse, equitable and inclusive culture where differences drive innovative solutions. Geotab’s diverse Employee Resource Groups will focus on awareness, research, and community partnerships to foster a more connected organization. Geotab believes that diversity is fundamental to its future growth and progress and is an integral part of its business activities. We also believe that success happens where new ideas can flourish in an environment that is rich in diversity and where people from various backgrounds can work together. At Geotab, we know that an environment that fosters diversity is the kind of environment which brings out the untapped potential that lies in our workforce, stimulates innovation and Company growth.

Recognizing and encouraging the uniqueness of individual contributions within a team environment is fundamental to Geotab and its employment policies. Our philosophy is found in each aspect of employment such as recruitment, compensation, training, promotion, transfer and benefits. Employees at Geotab will be treated as individuals according only to their abilities to meet job requirements, and without regard to 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 the employee works. Any kind of discrimination or harassment based upon these factors is neither permitted nor condoned, and above all, will not be tolerated under any circumstances.

Human rights

As part of a global enterprise, Geotab acknowledges and respects the guiding Canadian, U.S., United Nations, and international principles on human rights and fair conditions of employment. Geotab is committed to conducting our business in a manner consistent with these principles. Geotab supports and respects internationally proclaimed human rights and is never complicit in human rights abuses. Geotab expects the same high ethical standards from Partners in our operations and supply chain, and their Partners at all tiers; for more information on Partner expectations, see the [Partner Code of Conduct](#).



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Human trafficking

Geotab maintains a zero tolerance policy regarding trafficking in persons. Geotab employees and suppliers are prohibited from engaging in the following activities:

- Engaging in all forms of trafficking in persons;
- Procuring commercial sex acts; and
- Using forced labor.

Modern slavery

Geotab supports the elimination of all forms of forced, bonded, or compulsory labor, and promotes, wherever practicable and legal, the freedom of association.

Geotab condemns all forms of exploitation of children. We do not recruit or use child labor, and we support the elimination of exploitative child labor, including sexual exploitation of children. Geotab also insists that its subcontractors not engage in any form of modern slavery.

Geotab will cooperate with law enforcement authorities on all matters related to prohibiting and prosecuting any form of modern slavery.

[Geotab's public Modern Slavery Statement can be found here.](#)

Fair labor practices

Geotab is committed to fair labor practices, including payment of living wages, offering adequate health and other benefits, and providing safe workplaces. We also insist that our subcontractors also engage in fair labor practices.

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Discrimination and harassment

Unlawful discrimination, harassment and workplace violence

Geotab prohibits all forms of unlawful discrimination, harassment, bullying and violence in the workplace, and expects the cooperation of all employees. Employment with Geotab is assessed on the basis of job performance, experience, qualifications, and skills to perform their jobs without regard to race, national or ethnic origin, color, religion, sex, sexual orientation, age, marital status, disability, or any other basis for unlawful discrimination.

Geotab has a zero tolerance policy for workplace bullying, harassment or sexual harassment in the workplace. Everyone is entitled to a workplace where they are treated with dignity and respect.

Scenario

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 HR.

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Workplace violence

Geotab strictly forbids and will not tolerate any form of Workplace Violence and will take whatever steps are reasonable to protect its employees from Workplace Violence and domestic violence in the workplace, from all sources.

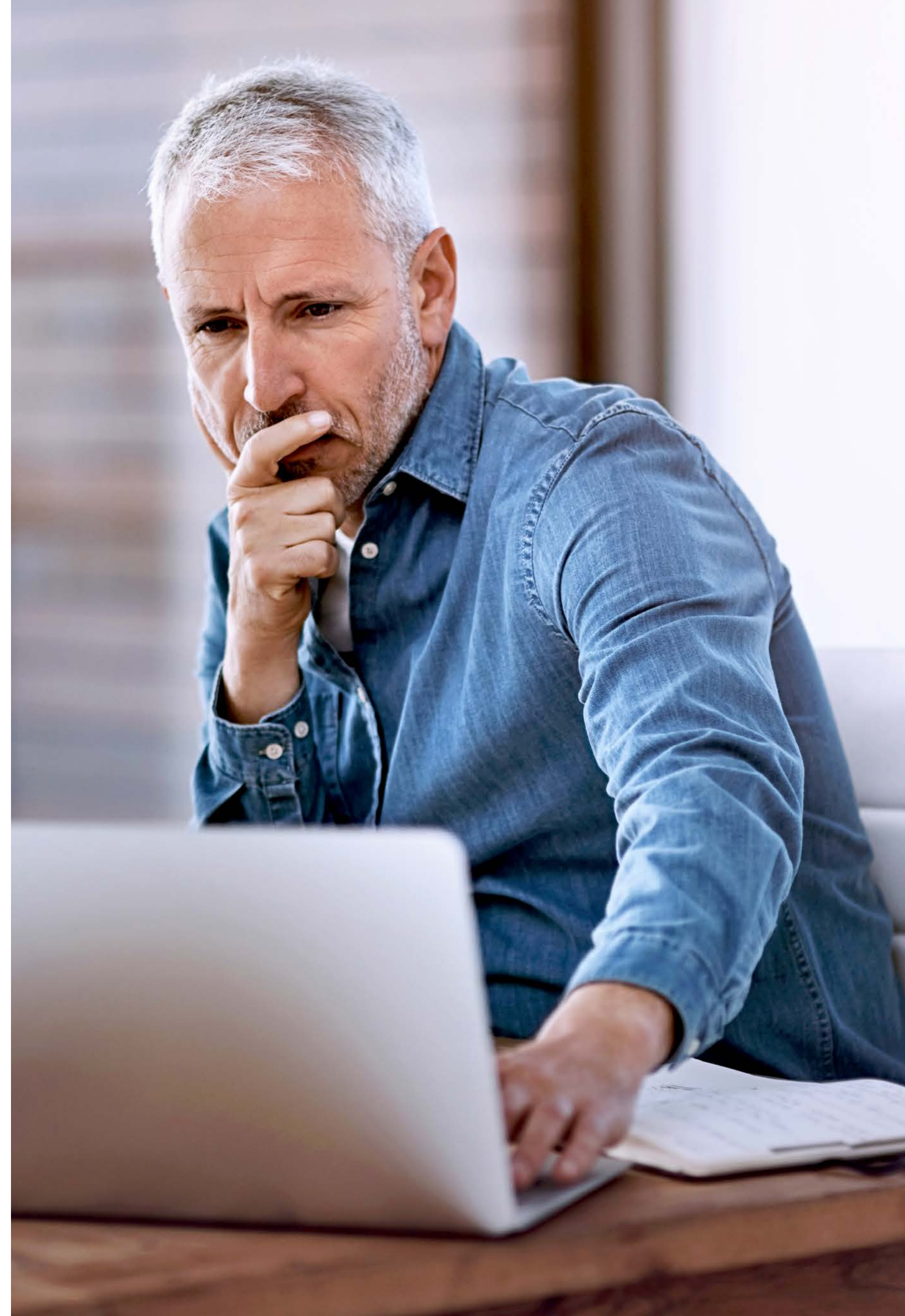
Drugs and alcohol in the workplace and substance abuse

Geotab prohibits impairment from drugs or alcohol in the workplace or during work hours when employees are working virtually (company-wide, regardless of location), as well as possession/sale/purchase/distribution of controlled substances. No employee may enter or remain at the workplace while their ability to perform the essential duties of his or her job is affected by alcohol, drugs or another substance, or the health or safety of the employee or others is endangered. If employees are required to use prescription medication, it must not inhibit their ability to proficiently and safely perform their job duties.

It is considered unprofessional and inappropriate to smoke or vape on video call meetings, regardless of the legality of the practice.

While at the workplace or during work-related activities, Geotab also prohibits:

- Use of illegal drugs/substances or misuse of prescription medication;
- Possession of illegal drugs/substances or related paraphernalia; and
- Sale/distribution/manufacture or purchase of legal/illegal drugs/substances, medication or alcohol.



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Environmental impact

Geotab’s advanced telematics solutions help support sustainability today by providing our customers with the tools to minimize their environmental footprint. Our goal is to promote sustainability and environmental awareness at all levels within the company as well.

Employees must work to minimize any negative impacts to the environment in all their decisions and actions. Geotab’s new “Green initiatives” will measure and analyze our current sustainability efforts and carbon footprint then implement measures to reduce our impact on the environment.

For more information on Geotab’s sustainability efforts see our [Environmental Code of Conduct statement](#).

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Employee conduct

Geotab believes that the success of our business is determined in part by establishing and maintaining a proper and professional atmosphere, which is affected by the image employees project as well as their business conduct. Employees are therefore expected to conduct themselves in a manner consistent with the policies contained in the Geotab Code of Conduct in fulfilling their duties and responsibilities of their position at Geotab. This includes punctuality, responsibility, and commitment. These guidelines outline the minimum standards expected of the employee's daily conduct, relationships and business dealings. Geotab's employment agreement restricts employees from attaining competing outside employment or providing consulting services on the side. Geotab is committed to maintaining a secure and productive work environment in which all employees are treated with fairness and respect. Employees are expected to be guided to the right decision by using their best judgment.

Management is responsible for providing guidance and support to assist employees in complying with Geotab's expectations on ethical business conduct, for ensuring employees understand and follow the conduct and requirements as set out in this policy handbook and assisting employees in resolving questions or issues. Management is accountable for maintaining a work environment where constructive, open, transparent and honest communication is encouraged without fear of retaliation.



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Off-duty conduct

Geotab generally considers time off duty and away from work as private. However, Geotab's reputation and business depend to a large degree upon the behavior of its employees. When employees fail to exercise good judgment and engage in unethical conduct, it may reflect negatively on Geotab — even if that conduct occurs when the employee is not at work or exercising their employment duties. Off-duty conduct can refer to in-person or online conduct.

Off-duty conduct will be considered a work-related matter subject to discipline if it:

- Harms the Company's reputation or products;
- Has consequences that render you unable to perform your job or any part of your job effectively;
- Leads other workers to refuse, be reluctant to or unable to work with you;
- Makes you guilty of a serious breach of the applicable criminal law; or
- Makes it difficult for the Company to manage its operations and/or direct its workforce efficiently.

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