

		<b>Loram Code of Conduct</b>	
Region	Global	Policy #	HR1400
Department	Human Resources	Revision Date	August 2024

### **Purpose:**

The purpose of the Code of Conduct is to form the basis of individual actions for, and on behalf of Loram. This Code of Conduct policy applies to all Loram Personnel (“Loram Personnel” means all directors, executive officers, personnel, and employees of Loram, including those of any subsidiary, division, or business unit).

### **Overview:**

The Code of Conduct policy is not a summary of all the Loram policies and does not address every situation one may encounter. Loram Personnel are expected to use good judgment and common sense, refer to more detailed Loram policies where appropriate, and ask questions.

### **Our Responsibility:**

The Human Resources department is responsible for administering this policy through appropriate timing and coordination with executive management. All functional leaders are responsible for appropriate role modeling in their personal behavior and ensuring their work environments mirror the spirit and intent of this policy. All Loram Personnel are responsible for understanding and adhering to this policy.

### **Company & Employee Conduct Guidelines:**

#### **Honesty, Integrity, and the Law**

Loram Personnel are expected to act honestly, with integrity, and to comply with the law at all times. Dishonest, unethical, or illegal behavior will have a negative impact on Loram and its reputation.

Compliance with both the letter and spirit of all laws, rules, and regulations applicable to Loram’s business is critical to its reputation and continued success. All Loram Personnel must respect and obey the laws of the cities, provinces, states, and countries in which we operate and avoid even the appearance of impropriety.

#### **Foreign Corrupt Practices Act**

All Loram Personnel shall comply with the Foreign Corrupt Practices Act Policy 1304 Anti-Corruption Policy.

#### **Confidentiality, Patents, and Inventions**

Loram Personnel must protect and not disclose any Loram confidential information during and after their employment with the company. Inventions, discoveries, and copyrighted material made or developed by employees in the course of, and relating to, their employment with Loram is the property of Loram unless a written release is obtained or expressly covered by the contract.

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**Health, Safety, Sustainability, and the Environment**

Loram is committed to environmental responsibility, sustainability, and providing a safe and healthy work environment.

**Respectful Workplace**

Loram is committed to providing a positive, ethical, safe, and healthy work environment where individuals are treated with dignity, fairness, and respect, free from discrimination, bullying, harassment, and violence. This includes not only the normal office or field operations setting but extends to locations employees visit for company purposes (e.g., conferences and Loram functions and events).

1. Discrimination based on any characteristic protected by the laws of the relevant jurisdiction (e.g., age, race, religion, gender, family status, sexual orientation, disability) will not be tolerated.
2. Harassment including threatening, intimidating, or aggressive behavior, ridiculing, or unwelcome sexual advances will not be tolerated.
3. Violence will not be tolerated, and weapons are not permitted in the workplace unless authorized for security purposes by Loram's Chief Executive Officer<sup>i</sup>.
4. Use of illegal drugs, inappropriate use of alcohol, or misuse of medications or other substances is prohibited.
5. Bullying others by repeated unreasonable actions, that are intended to intimidate, degrade, humiliate, or undermine the victim(s), or which could create a risk to the health or safety of the employee(s) is unacceptable. Bullying may involve one or multiple bullies and one or more victims. Bullying often involves abuse or misuse of power.

**Company Assets and Use of Technology**

All Loram Personnel should promote the responsible use of Loram's assets and resources and ensure the efficient use of those assets. Company computers and computer networks are to be used for company-related business purposes. The use of Loram computer resources to view, retrieve, store, or send inappropriate material including that of a sexually explicit, violent, bigoted, racist, offensive, or illegal nature is strictly prohibited. Loram may periodically monitor access and content of Loram computers, computer systems, networks, and communication devices. Loram Personnel should have no expectation of a right to privacy regarding Loram computer resources and communication devices or electronic data residing on Loram computer resources and communication devices.

Loram retains the right (but does not have a duty) to conduct video and audio surveillance on Loram property or in Loram vehicles, including but not limited to video and audio surveillance of employees and third parties, such as audio and video surveillance in Loram vehicle cabs. Such surveillance is for the purposes of ensuring safety measures and compliance procedures are properly followed, deterring crime, and protecting Loram Personnel and Loram property. Loram Personnel should have no expectation of privacy on company premises (other than in restrooms, shower areas, nursing spaces, or other similarly sensitive locations) or in company vehicles or company equipment. Nothing herein is intended to or will be applied in a manner to interfere with employees' rights to engage in protected concerted activity, as permitted by the National Labor Relations Act (NLRA) or relevant local laws. Information obtained through video and audio surveillance will be used for security, safety, training, and investigational purposes and may be shared with Loram Personnel and customers. Information obtained will not be used for marketing

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or other external-facing purposes without specific employee consent, unless required or permitted by law.

### **Public Relations**

Unless an individual is specifically authorized to represent Loram to the media, no Loram Personnel may respond to media inquiries or requests for information (newspapers, magazines, trade publications, radio, television, etc.). All inquiries should be directed to the Marketing department, along with obtaining approval from their department Vice President. Loram Personnel should direct inquiries and seek prior approval for their own participation from the Chief Executive Officer\*. Utmost care must be taken to not disclose confidential, personal, or business information through public or casual discussion with the media or others.

### **Privacy**

Loram is committed to safeguarding the personal information entrusted to Loram by Loram Personnel, its clients, and customers. Loram Personnel must abide by applicable privacy laws and safeguard personal information they come in contact with through their relationship with Loram. Loram Personnel should exercise care when discussing what may be considered private information with other employees or outside parties.

## **Employee Conduct Outside of the Workplace:**

### **Outside Business Activities**

Loram Personnel may not participate in business or financial activities that compete with Loram or provide goods or services to the competitor company without the prior written consent of Loram's Chief Executive Officer\*.

Loram Personnel may not participate in an outside business that supplies services or has business dealings with Loram where there is a possibility of preferential treatment being received by virtue of the employee's position.

Loram Personnel appointments to boards of outside companies or associations (other than of a religious, community, service club, or sports nature) must be approved by Loram's Chief Executive\* Officer, or in the case of the Chief Executive Officer\*, Loram's Board of Directors Chairperson.

### **Political Activities**

Loram Personnel are free to participate in political activities as private citizens in their free time but must not use their employment or affiliation with Loram in a way that would harm or impact the reputation of Loram or its employees.

## **Conflicts of Interest & Fair Dealing:**

### **Conflicts of Interest**

Loram Personnel must avoid situations while acting for Loram that constitute an actual or perceived conflict of interest. A conflict of interest exists when individual interests interfere, conflict, or appear to interfere or conflict with the interests of Loram in a way that may adversely influence the individual's objectivity or exercise of sound, ethical business judgment. This can include when Loram Personnel or a family member receives an improper personal benefit.

These individuals must notify Loram, through direct communication with their immediate supervisor and department Vice President, of any potential conflicts of interest and obtain the prior written consent of Loram before taking any action that may be a potential conflict. Executive Officers must notify the President and Chief Executive Officer\*, or Vice President of Human Resources. If one is unsure, then the appropriate course of action is to ask, always.

By way of example, a conflict of interest may arise if any Loram Personnel:

- has a material personal interest in a transaction or agreement involving Loram;
- lends to, borrows from, or has a material interest in a competitor, supplier, or customer of Loram, or any entity or organization with which Loram does business or seeks or expects to do business (other than routine investments in publicly traded companies or borrowing from financial institutions);
- knowingly competes with Loram or diverts clients, customers, or other business opportunities from Loram;
- serves as an officer, director, employee, consultant, or in any management capacity in a competitor of Loram or in an entity or organization with which Loram does business or seeks or expects to do business; or
- participates in a venture in which Loram has expressed an interest.

Loram Personnel are expected to use common sense and good judgment in deciding whether a potential conflict of interest may exist. In the event of a potential conflict of interest, Loram Personnel should notify Loram and clear any potential conflicts.

### **Fair Dealing**

Loram Personnel must deal fairly with Loram customers, contractors, partners, clients, employees, and other stakeholders and must not take unfair advantage of anyone through manipulation, concealment, abuse of privilege, misrepresentation, illegal conduct, or any other unfair dealing practice.

### **Gifts, Benefits, and Entertainment**

Loram Personnel must avoid both the fact and the appearance of improperly influencing the judgment or business decisions of the organizations or individuals with whom they deal.

Gifts, benefits, and entertainment must:

- be of nominal value, or reasonable and customary according to industry practices or applicable custom;
- not be intended as an inducement;
- be in compliance with applicable law; and
- not embarrass Loram or its employees if disclosed publicly.

Loram Personnel who are unsure in a specific instance should consult with the General Counsel of Loram by submitting a ticket via the HALO web portal.

**Financial Matters:****Integrity of Financial Information**

Accurate, up-to-date financial information is critical to make informed decisions. Many Loram Personnel contribute directly to various reporting processes that impact the integrity and accuracy of financial information, statements, and management reports. All employees have a responsibility to ensure that financial records accurately reflect financial transactions. Adequate controls must be maintained to ensure the accuracy of financial reporting. Any intentional misrepresentations or improper claims for expense reimbursement, regardless of size, are a clear contravention of this policy and bring into question the integrity of the employee as well as Loram itself.

**Release of Financial Information**

Financial information of any nature about Loram, its shareholders, affiliates, or related persons may not be disclosed to a third party without the prior written consent of Loram's Chief Executive Officer\* or Chief Financial Officer except where required for statutory purposes.

**Insider Trading and Tipping**

Loram Personnel may become aware of non-public information about public entities, such as other corporations with which Loram has business dealings. To use non-public information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is unethical and illegal. Loram Personnel are prohibited from trading in the securities of any corporation when they are in possession of material non-public information regarding that corporation, and they are not allowed to tip or pass on material non-public information to any other person who might make an investment decision based on that information or pass the information on further.

**Administrative Matters:****Corporate Policies**

In addition to corporate policies referred to in this Code, Loram maintains a variety of policies and procedures by which employees must abide. These policies are available to all Loram Personnel via a variety of communication vehicles used throughout Loram. Loram Personnel are responsible for knowing and understanding all policies and procedures.

**Consultants, Contractors, and Agents**

Consultants, contractors, agents, and other representatives of Loram and its subsidiaries are expected to meet the same or higher standards as those set out in the Code of Conduct in addition to complying with the Foreign Corrupt Practices Act and any relevant local laws.

**Reporting Violations of the Code of Conduct**

Loram Personnel who believe in good faith that a violation of the Code of Conduct or any law, rule, or regulation has been or is likely to be committed have an obligation to promptly report the relevant information to an appropriate supervisor or manager. If the appropriate supervisor or manager is not available, or if it is not appropriate to report to them in the circumstances, the violation or potential violation may be reported to any executive officer of Loram.

Loram Personnel may also report any complaint or concern anonymously through Loram's Global Whistleblower Program, a Navex Global confidential reporting system accessible through [www.loram.ethicspoint.com](http://www.loram.ethicspoint.com) (1-844-635-4640). A report can be made by phone or online from this site, and you can access your report for updates.

Reports made in good faith will be kept confidential to the fullest extent possible, consistent with the need to conduct an adequate review and subject to applicable law.

Loram will not discharge, demote, suspend, or retaliate against an employee who, in good faith, brings forward reasonable concerns about actual or potential violations of laws, rules, or regulations, or this policy.

### **Compliance**

Loram Personnel are required to review the Code of Conduct and Loram's policies and procedures and abide by them. Failure to abide by the Code of Conduct and/or Loram policies and/or procedures may lead to disciplinary action, up to and including termination of their employment.

***Loram Personnel should not hesitate to ask questions regarding this Code of Conduct or any of Loram's policies or procedures.***

**Related Documents, Forms and Tools:**

These documents, forms, and tools do not replace this policy, they are to support the purpose of this policy.

- FCPA 1304 Anti-Corruption Policy
- HR1404 Office Environment Policy
- HR1405 Contraband Policy
- HR1406 Equal Opportunity No Harassment Policy
- HR1407 Workplace Violence Policy

**Disclaimer:**

Loram adheres to a policy of non-discrimination and equal opportunity. This policy is applied without regard to race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, genetic information, disability, marital status, pregnancy/maternity or veteran status.

All policies are subject to change at any time and with or without notice.

**Provisions Specific to Loram UK:**

- All Employees shall comply with the UK Bribery Act 2010. No Loram employee or family member of an employee should accept, solicit or give (directly or indirectly) any improper gift or hospitality. Any gifts and/or hospitality must be declared. (see LUKL-HRP-044 Anti-Bribery and Anti-Corruption Policy).
- Loram UK will run efficient operations that minimize waste and reduce effect of its business activities, and will promote sustainable development (see LUKL-ENV-001 Environmental Management Safety Manual and LUKL-ENV-001-01 Environmental Sustainability Strategy).
- Loram UK's business and employees must comply with all competition and anti-trust rules in the countries in which they operate (see LUKL-MSP-007 Directory of Interested Parties).
- Loram UK will provide a safe and healthy working environment, and shall not compromise the health or safety of any individual (see LUKL-OCC-003 Health and Safety Strategy).
- Loram UK values its employees and their diversity, and will develop its people and reward them fairly (See LUKL-HRP-003 Equality at Work).

**Provisions Specific to Loram South America:**

- In addition to the Loram Code of Conduct, all Employees shall comply with Code of Ethics and Conduct HB-1400 BR, Policy LSA-POR-RH-09 Related-Party Transactions.

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<sup>i</sup> \*This Policy contains references to Loram Employee titles which are not utilized among all of Loram's global entities. For clarity, this Policy should be interpreted such that "Chief Executive Officer" refers to the Managing Director (or General Manager) of the respective Loram entity. Other inapplicable titles used herein shall refer to the department leader or other corresponding position at the respective Loram entity.