

Code of Conduct and Business Ethics



**Dear Voyager,**

At Voi, we believe in a future free from noise and pollution. We want to create cities made for people, not for cars. To accomplish this, we have taken the most advanced technology and made it accessible to everyone. This is possible thanks to our dedicated employees spread across our different markets, united by one goal: to create safe, sustainable and reliable micromobility for everyone.

We know that as a company, we will only succeed in achieving our mission by being committed to conducting our business in a professional, ethical and compliant way. This Code of Conduct explores how we underpin our mission across the company, ensuring that all Voyagers are aligned with our business practices.

All employees are to read the Code of Conduct and adhere to the values and expectations laid out therein.

Fredrik Hjelm

CEO and founder



The Voi Values	1
Push boundaries	1
Build with empathy	1
Ride together	1
The Voi Values guide us in how we conduct ourselves	1
Shaping the future	2
At Voi, we are all leaders	2
The Code applies to everyone	2
Its values are derived from external best practices	2
① Voiagers earn business fairly and lawfully	3
Fair Competition	4
Anti-corruption, gifts, and bribery	4
Improper payments	4
② Voiagers safeguard company information and assets	5
Information and data privacy	6
Association with the Voi brand	6
③ Voiagers create products of the highest quality and safety standards	7
Product quality and Safety	8
④ Voiagers respect and care for one another	9
Health and Safety	10
Non-discrimination, diversity, and inclusion	10
Respect for human and labour rights	11
A respectful working environment free from harassment	11
⑤ Voiagers have the environment in mind in everything we do	12
Environmental responsibility	13
Upholding the Code of Conduct	14
Whistleblowing procedure	15



Push boundaries

We dare to design the future of mobility
We want to challenge the status quo, bringing positive change and tangible solutions that have a meaningful impact on people's lives. We're taking the lead in driving change, to meet the demands of tomorrow, we have to be better than we were yesterday, continuously pushing boundaries - not just in our industry, but in society as a whole.

We firmly believe in our vision - setting ambitious goals and overcoming challenges are part of our DNA. We dare to try new things, strive for progress over perfection and learn as we go.



Build with empathy

We create long-lasting, sustainable impact
As one of Europe's largest mobility players, we know that our impact goes well beyond the service we provide to our riders. Our operations affect the lives of millions of people every day, in all the cities where we are present.

For us to succeed in our mission, we have to understand the behaviours, motivations, and pain points of all of our customers - riders, cities, and citizens alike. By building with empathy, we take a proactive approach to problem-solving, and ownership of the quality and impact of our work. We design for outcomes and grow with purpose - to reimagine, reinvent and redefine the very meaning of urban living.



Ride together

We collaborate with the ambition of changing the world
We are on a mission to change things for the better. Since lasting change doesn't happen in isolation, we must collaborate with cities, communities, and people who share our vision. There's strength in diversity, among people, and in thought, and we are the sum of our collective talent. We celebrate our wins as a team, learn from our losses as a team, and work through our challenges as a team. We grow by making feedback an integral part of our ways of working.

The Voi Values guide us in how we conduct ourselves










When we succeed commercially, it drives our business forward. When we act as a responsible part of society, we promote and reinforce our values in all markets where we are active, contributing to a well-functioning society.

voi.

At Voi, we are all leaders

Our Leadership Principles are a reflection of the Voi Values and the principles laid out in this Code.

- 
LEAD BY EXAMPLE
 We inspire through action. Take an active part in the team’s work and never hesitate to roll up your sleeves.
- 
CREATE CLARITY
 We communicate goals and set the direction. Provide context, help prioritise, define responsibilities and ensure follow-up.
- 
TAKE ACTION
 We value action over inaction and promote the same in our teams.
- 
THINK LIKE AN OWNER
 We make decisions that generate long-term value for everyone – cities, riders, and colleagues alike. Act with the company’s best interest in mind, not just our teams.

- 
SET THE BAR HIGH
 We expect and deliver high-quality results and strive to continuously develop our teams.
- 
BUILD TRUST
 We dare to show vulnerability. Listen to the team and understand their needs and motivation. Create a safe space that fosters and enables growth.
- 
PROMOTE COLLABORATION
 We leverage the collective knowledge of the organisation. Bring in different perspectives, connect the right people, and facilitate collaboration across functions.

The Code applies to everyone



Our Code applies to everyone at Voi, including full and part-time employees, contract staff, managers, and the Board of Directors. All employees at Voi have a responsibility to inform themselves about the rules and policies relevant to their work. Our Code also sets our expectations for business partners, consultants, and third parties.

Its values are derived from external best practices



Voi’s Code of Conduct (“the Code”, “our Code”) shows our values in action, particularly in areas with key ethical or legal considerations. These values are also based on external best practices, like the **Ten Principles of the United Nations Global Compact**, of which Voi is a signatory. The principles in turn are derived from: the Universal Declaration of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

The Code is what we stand for
and what we expect from you.

① Voiagers earn business fairly and lawfully



Fair Competition

We trust that our service will succeed in a competitive environment. We do not take actions that are illegal under competition law. Since competition law is complex, employees should consult with Legal if they have any concerns.

FOR VOIAGERS, THIS MEANS:

- Do not exchange commercially sensitive information with a competitor
- Do not discuss matters where competition issues can arise, such as pricing
- Only use legitimate methods to gather information about competitors
- Be extra mindful and review competition training when participating in activities that involve contacts with competitors, like industry association activities or industry cooperation projects

Anti-corruption, gifts, and bribery

The rule for all of us at Voi is simple – don’t bribe anybody, anytime, for any reason, and do not accept bribes of any kind.

Voi strictly prohibits corruption and any type of bribery. We do not pay, offer or accept bribes or other improper advantages, for example, gifts, to influence business decisions or secure an advantage.

FOR VOIAGERS, THIS MEANS:

- Never give or promise to give anything of value from a third party, nor accept anything from a third party, to gain an improper advantage or influence a decision
- Limit the use of gifts and hospitality and ensure that they are reasonable and appropriate under the circumstances
- Ensure appropriate records are kept of all transactions and expenses

Improper payments

We act with the highest standards of transparency and integrity wherever we operate. This ensures that our actions and decisions are always in line with the best interests of our riders, non-riders, and cities.

FOR VOIAGERS, THIS MEANS:

- Do not offer or accept financial support that could encourage or lead to corruption
- Do not offer, provide, authorise, request, accept or receive bribes, either directly or indirectly, including through any third party



② Voiagers safeguard company information and assets





Information and data privacy

Our riders, suppliers, partners, and other third parties trust us to keep their information and data safe and secure. We handle personal data and aggregated data with respect, securely, and lawfully. Similarly, we must protect confidential information such as any nonpublic information about our products, innovation, financial or strategic plans or position, and our processes.

FOR VOIAGERS, THIS MEANS:

- Never post confidential company information on social media and do not discuss confidential information in public places or leave confidential material unattended to, even in the workplace
- Protect the confidential information that riders, suppliers, partners, and third parties share with us
- Ensure that non-disclosure agreements are signed before sharing confidential information externally
- Make sure you are authorised and have a proper business purpose before disclosing confidential information to anyone outside the company
- Only collect and use personal data that is needed, and do not collect or use more
- Only use the personal data for the purpose it was collected for
- Handle and store personal data securely

Association with the Voi brand

All employees shall act in a way that does not hurt but strengthen the Voi brand, during all times when associated with Voi. When posting online about Voi or our industry on social media, Voiagers should always keep in mind Voi's visions, missions, and values. Voiagers must ensure that what is posted won't harm how colleagues, our suppliers, our customers, or any third parties view Voi as a company. More information can be found through Voi's Social Media Policy.

FOR VOIAGERS, THIS MEANS:

- Before allowing another organisation or company to use the Voi brand in any way, check with your manager
- Do not publish, post or release any information that is considered confidential or not public information via social media
- Never act (say, write, post) in a way that harms the Voi brand

③ Voiagers create products of the highest quality and safety standards



Product quality and Safety

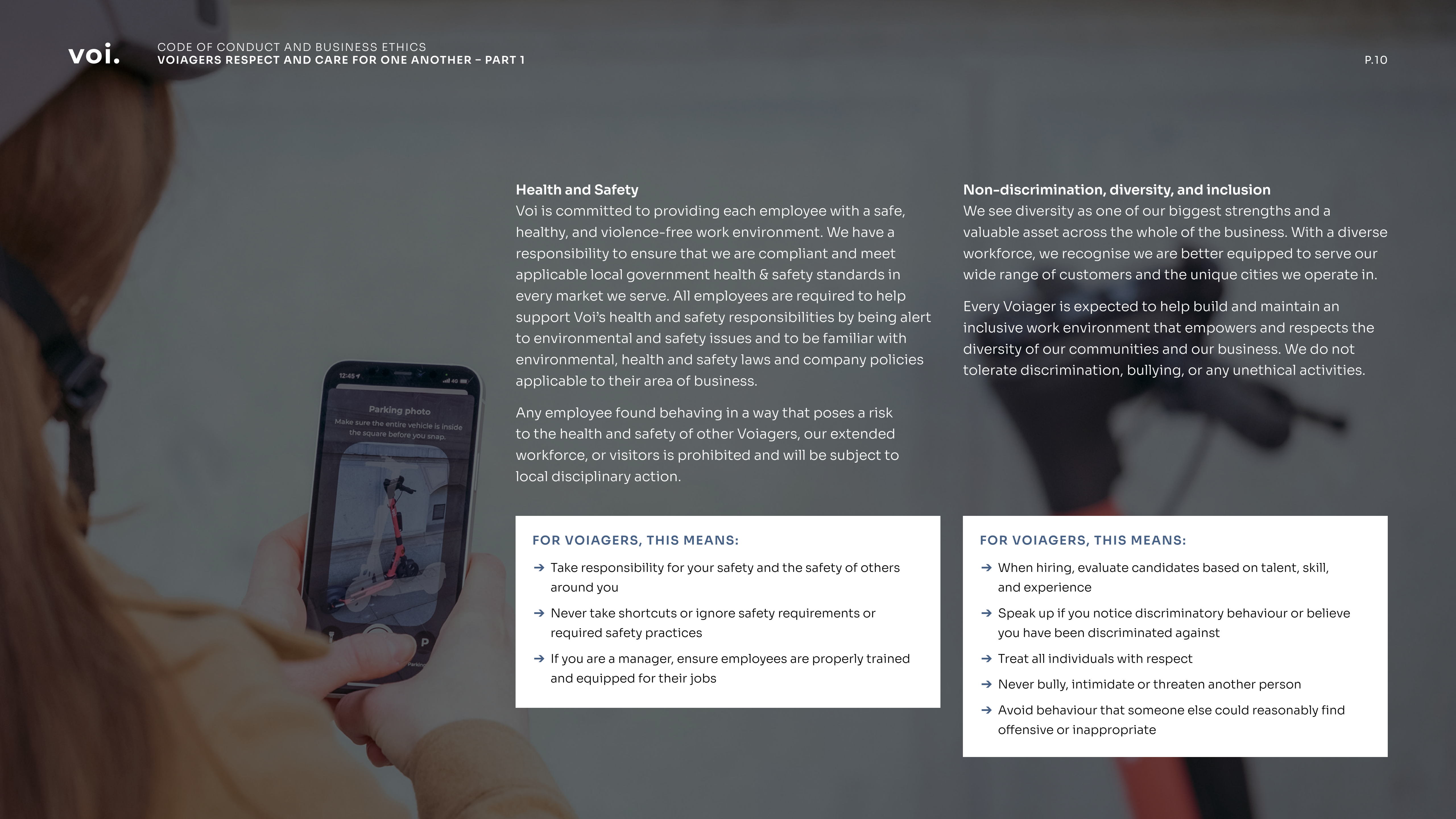
At Voi, we pride ourselves on the quality and safety of our vehicles. Compliance is essential to build trust in our products.

FOR VOIAGERS, THIS MEANS:

- If you design new products or change existing products, ensure they meet existing regulatory and legal standards
- Never compromise product compliance
- Comply with all legal regulatory requirements

④ Voiagers respect
and care for one another





Health and Safety

Voi is committed to providing each employee with a safe, healthy, and violence-free work environment. We have a responsibility to ensure that we are compliant and meet applicable local government health & safety standards in every market we serve. All employees are required to help support Voi’s health and safety responsibilities by being alert to environmental and safety issues and to be familiar with environmental, health and safety laws and company policies applicable to their area of business.

Any employee found behaving in a way that poses a risk to the health and safety of other Voiagers, our extended workforce, or visitors is prohibited and will be subject to local disciplinary action.

FOR VOIAGERS, THIS MEANS:

- Take responsibility for your safety and the safety of others around you
- Never take shortcuts or ignore safety requirements or required safety practices
- If you are a manager, ensure employees are properly trained and equipped for their jobs

Non-discrimination, diversity, and inclusion

We see diversity as one of our biggest strengths and a valuable asset across the whole of the business. With a diverse workforce, we recognise we are better equipped to serve our wide range of customers and the unique cities we operate in.

Every Voyager is expected to help build and maintain an inclusive work environment that empowers and respects the diversity of our communities and our business. We do not tolerate discrimination, bullying, or any unethical activities.

FOR VOIAGERS, THIS MEANS:

- When hiring, evaluate candidates based on talent, skill, and experience
- Speak up if you notice discriminatory behaviour or believe you have been discriminated against
- Treat all individuals with respect
- Never bully, intimidate or threaten another person
- Avoid behaviour that someone else could reasonably find offensive or inappropriate

Respect for human and labour rights

Voi is committed to respecting internationally recognized human rights. We comply with applicable laws and agreements on employment conditions such as working and resting hours, and compensation and benefits. We do not tolerate any forms of modern slavery, including forced labour or human trafficking. We respect children’s rights and do not use child labour.

FOR VOIAGERS, THIS MEANS:

- You have the right to receive adequate information regarding your employment terms and conditions, including your rights and obligations, in a language you understand
- You do not need to accept employment conditions including working time or compensation that do not meet applicable legal requirements
- Do not use or support any forms of modern slavery or forced labour in our operations or business relationships
- Be mindful of respecting human rights

A respectful working environment free from harassment

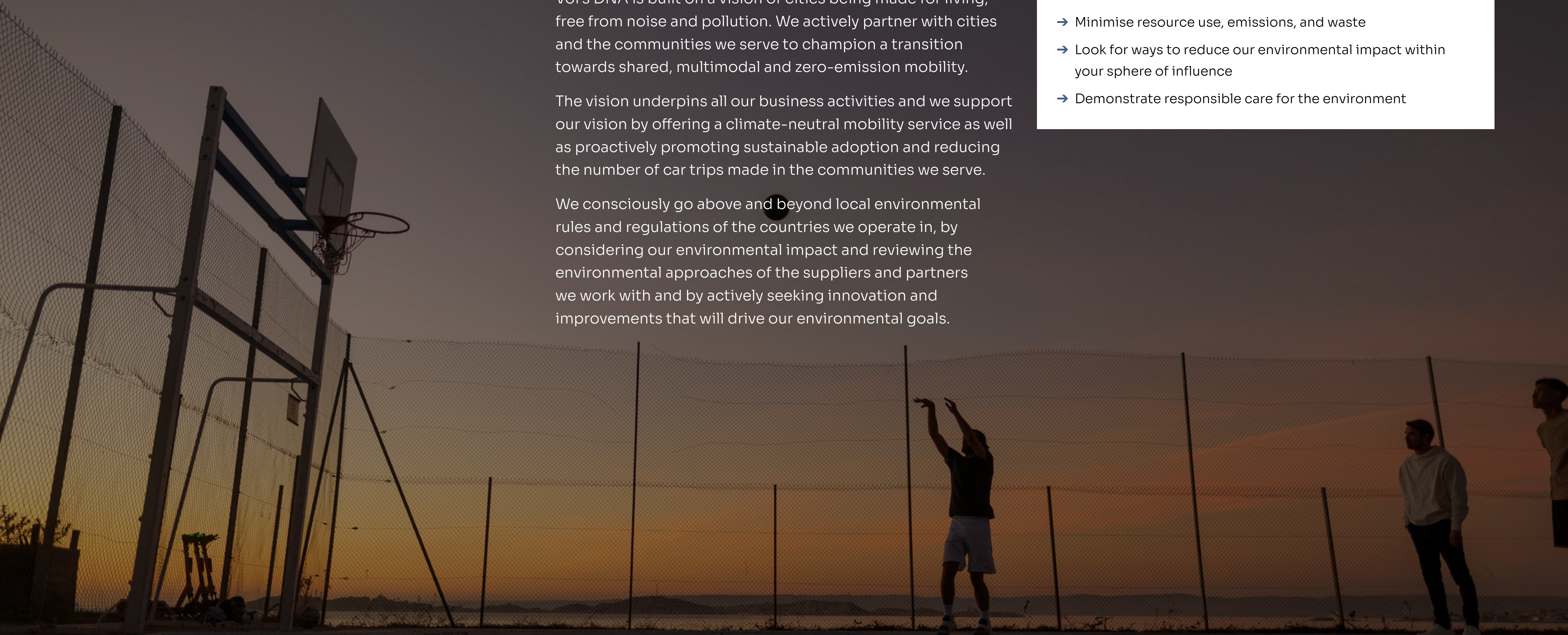
At Voi, any type of unwelcome conduct that creates an intimidating, offensive, or hostile work environment is intolerable, including harassment. Harassment here means any conduct or comments that create, encourage or permit an offensive or intimidating work environment, be it verbal or physical harassment, bullying, sexual harassment, power harassment, racism, inappropriate, humour or other actions that offend or cause distress.

FOR VOIAGERS, THIS MEANS:

- We treat one another with respect
- Never bully, intimidate or threaten another person
- Avoid behaviour that someone else could reasonably find offensive or inappropriate
- Think of how your words and actions might be perceived by others
- If you observe or experience harassment or inappropriate conduct, voice your concern

⑤ Voiagers have the environment in mind in everything we do





Environmental responsibility

Voi’s DNA is built on a vision of cities being made for living, free from noise and pollution. We actively partner with cities and the communities we serve to champion a transition towards shared, multimodal and zero-emission mobility.

The vision underpins all our business activities and we support our vision by offering a climate-neutral mobility service as well as proactively promoting sustainable adoption and reducing the number of car trips made in the communities we serve.

We consciously go above and beyond local environmental rules and regulations of the countries we operate in, by considering our environmental impact and reviewing the environmental approaches of the suppliers and partners we work with and by actively seeking innovation and improvements that will drive our environmental goals.

FOR VOIAGERS, THIS MEANS:

- Minimise resource use, emissions, and waste
- Look for ways to reduce our environmental impact within your sphere of influence
- Demonstrate responsible care for the environment

Upholding the Code of Conduct



Whistleblowing procedure

All managers are open to receiving and handling concerns professionally. To express a concern, you can use one of the following resources:

- Your manager or your manager's manager
- Legal or HR / People & Culture representatives
- Voi's external whistleblowing system WhistleB

When you report something, you always have our full support and we will guide you through the full process.

If you wish to stay anonymous, our external service partner WhistleB is the best option to report your concern. Here, you can report serious risks affecting individuals, our company, society, or the environment.

Once you make a report, Voi will investigate the situation and take any action deemed necessary. No one should at any time feel at risk of retaliation, discrimination, or disciplinary action for raising a complaint or reporting irregularities. This is the case irrespective of the reporting method you choose. Any individual accused of subjecting another to reprisals may be subject to serious disciplinary actions.

More information about Voi's whistleblowing procedure can be found in Voi's Whistleblowing Policy.

