



# Transcom

## Supplier Code of Business Conduct

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Policy Owner	Board of Directors	Approved by	Board of Transcom Worldwide AB
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Update frequency	Annual	Next update date	2018
		Update responsible	Head of Procurement
Access	Public	Communication plan	<ul style="list-style-type: none"> <li>• Internet</li> <li>• Intranet</li> <li>• Emails</li> <li>• Communicated to new vendors along with contracts</li> </ul>
Training	Yes	Training frequency	Annually
Training responsible	Head of Procurement	Oversight responsibility	COO

## Supplier Code of Business Conduct - Introduction

Transcom is committed to following a high standard of responsible and ethical business conduct in accordance with the best practices as detailed in our own Code of Business Conduct. To encourage the adoption of these values, attitudes and practices, Transcom has developed this Supplier Code of Business Conduct to be implemented among our network of supplier partners across the globe.

By accepting this Code, Transcom Suppliers and their subsidiaries, including their employees, agents and subcontractors, commit to ensuring that all existing and future agreements and business relationships with Transcom will be subject to the provisions contained herein. It is the Supplier's responsibility to educate its employees, agents and subcontractors accordingly.

Transcom will assess its suppliers' compliance with this Code, and any violations of this Code may jeopardize the supplier's business relationship with Transcom, up to and including termination of the relationship.

At Transcom we believe that the adoption of ethical and responsible business practices is both our moral obligation and essential to the long-term success of our business.

## Implementation and follow up

Transcom expects suppliers to observe, respect and apply these fundamental principles throughout their sphere of responsibility.

Transcom may provide any explanation necessary for the implementation of this Supplier Code of Business Conduct during pre-contractual and contractual relationships.

Transcom also expects suppliers to provide transparency on the fulfillment of the conformity with the Supplier Code of Business Conduct by self-assessment in a format demanded by Transcom at the suppliers' own cost.

Transcom will be entitled, by itself or through a nominated auditor, to audit suppliers, and their sub- contractors in order to assess conformity with this Supplier Code of Business Conduct. This may include on-site audit process.

If Transcom becomes aware of any actions or conditions not in compliance with this Supplier Code of Business Conduct, we reserve the right to demand corrective measures. In case a supplier fails to remedy the identified breaches, Transcom may terminate the contract with the supplier.

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## **Compliance with Laws**

As a basic tenet of this code and a fundamental element of their approach to doing business, our suppliers must observe all minimum legal requirements, regulations and standards applicable in their respective operating countries.

## **Honoring Human Rights**

Our suppliers must support and respect the protection of internationally proclaimed human rights as described in the United Nations' Declaration of Human Rights and must make sure that they are not complicit in human rights abuses.

## **Labour standards**

Our suppliers must ensure that forced, compulsory or child labor is eliminated from their operations. We also expect our suppliers to offer fair and reasonable compensation and working hours to their employees in line with legal requirements as stipulated in their countries of operation.

## **Discrimination**

Our suppliers must be committed to providing an equal-opportunities work environment, where discrimination on grounds of race, color, creed, religion, national origin, citizenship, gender, age, physical or mental disability, political belief, sexual orientation, marital or family status, pregnancy, economic status, or other legally protected status is not tolerated.

## **Harassment**

Within their operations, our suppliers must not tolerate harassment in any form, whether sexual, verbal or emotional in nature and will not accept behavior which may be described as disrespectful, hostile, violent, intimidating or threatening including unwelcome verbal or physical conduct of a sexual nature.

## **Freedom of Association:**

Where there is a legal obligation to so, our suppliers must respect the right of workers to freely associate in employee representation groups, without suffering any kind of discrimination, intimidation or harassment.

## **Workplace Safety**

We expect our suppliers to provide their employees with safe work environments, where risks of injury accident are minimized, in compliance with all applicable health, safety and environmental laws.

## Respecting the environment

Suppliers should recognize, as we do, that environmental responsibility is integral to a sustainable and successful long-term future, both for society and for our businesses. As a minimum, our suppliers' operations should comply with applicable environmental rules and regulations pertinent to their industry and the countries where they do business.

Suppliers who run manufacturing operations should minimize adverse effects on the community, environment and natural resources, while safeguarding the health and safety of the public. Furthermore, raw materials required for the manufacturing process should be responsibly and ethically sourced in a way that is not detrimental to the environment.

Waste of all types, including water and energy, should be minimized. Chemicals and other hazardous materials which pose an environmental threat are to be identified and managed. Wastewater and solid waste generated from operations, industrial processes, and sanitation facilities are to be monitored, controlled, and treated. In addition, we also encourage our suppliers to harness the potential to bring about positive behavior change among their workforces by promoting environmentally friendly behavior in the workplace.

## Ethical Conduct

Transcom expects its suppliers to apply the highest standards of integrity in all business interactions. The supplier shall always be ethical in every aspect of its business, including relationships, practices, sourcing, and operations. No Transcom supplier will ever engage in corrupt practices including bribery, fraud or embezzlement.

Transcom's Code of Business Conduct prohibits employees and representatives from offering, soliciting or accepting gifts or lavish and inappropriate entertainment and hospitality. Accordingly, we therefore ask that our suppliers refrain from offering gifts or gratuities to Transcom employees which, if accepted, would cause a violation of this rule.

Transcom suppliers are required to report any inappropriate request by a Transcom employee for gifts or gratuities.

The supplier must disclose any actual or potential conflict of interest or relationship that they may have or have with any Transcom employees, and discuss it with Transcom's management. Any activity that is approved, despite the actual or apparent conflict, must be documented and expressly approved.

Transcom or any of its subsidiaries doesn't accept to work with sanction-restricted vendors who have been included in sanction lists published by any sanctioning authority or are owned by a person who is subject to sanctions.

## **Protecting Confidential Information**

Our suppliers must treat confidential and proprietary information about clients, customers and employees carefully and securely.

As an outsourced service provider, our core business activities are based on the effective and respectful handling of information about clients, customers, our employees or, indeed, any stakeholder who has an interest in or relationship with our company.

In the course of their working relationship with Transcom, suppliers may receive or encounter information about our business activities, contracts, projects, structure, financial situation or performance. Such confidential information must not be disclosed to any third party without prior written permission from Transcom. Disclosure of such information to employees of the supplier must also be restricted to those who have a need to know such information and in accordance with applicable regulations and prevailing industry practices.

## **Audits and Assessments**

Supplier shall perform periodic evaluations of its facilities and operations, and the facilities and operations of its subcontractors and next-tier suppliers to ensure compliance with this Code and the applicable law.

Supplier will permit Transcom and/or a third party designated by Transcom to periodically evaluate Supplier's facilities and operations, and those of its subcontractors and next-tier suppliers, to the extent they are providing goods or services to Transcom and for Transcom's benefit or use.

## **Fair business practices**

Our suppliers must uphold standards of fair business, advertising and competition and ensure that information provided to customers is not misleading. Furthermore, our suppliers will never make pacts with competitors to restrict competition by fixing prices or allocating markets.

**Supplier Code of Business Conduct Declaration**

In my capacity as an official and legal representative of [COMPANY NAME], I hereby acknowledge that I have read and understood the contents of Transcom’s Supplier Code of Business Conduct and that all representatives of [COMPANY NAME] agree to abide by the stipulations detailed within it.

I confirm that we will inform Transcom if a situation of non-compliance arises and will take all necessary actions to promptly remedy any identified non-compliance.

I also understand that Transcom reserves the right to terminate its business relationship with us if we are unwilling or unable to comply with this Supplier Code of Business Conduct when termination is allowed by applicable laws.

*(Ensure signature by two persons employed by Supplier)*

Place and Date:

Signature 1:

Signature 2:

Name and Position:

Name and Position:

*(Ensure seal of supplier’s company is affixed to these signatures)*