



Transcom

Global Whistleblower policy

Name of the Policy	Global Whistleblower policy	Creation Date	13-Oct-2014
Policy Owner	Board of Directors	Approved by	Board of Transcom Worldwide AB
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Current version	v 1.3	Current version date	16-May-2017
Update frequency	Annual	Next update date	2018
		Update responsible	Head of Internal Audit
Access	Public	Communication plan	<ul style="list-style-type: none"> • Internet • Intranet • Emails
Training	Yes	Training frequency	<ul style="list-style-type: none"> • Communicated while onboarding new employees (signed copy retained by HR) • Annual reinforcements using online training and video
Training responsible	Local HR	Oversight responsibility	Regional HR

Contents

<i>Introduction</i>	3
<i>Objective & Scope</i>	3
<i>Definition of malpractice</i>	3
<i>Protection</i>	4
<i>Whistle-blowing Procedure</i>	4
<i>Recommended structure of a Whistle Blower Report</i>	5
<i>Investigation process</i>	5
<i>Confidentiality</i>	6
<i>Reference</i>	6
<i>Appendix</i>	6

Introduction

Transcom Worldwide (*including subsidiaries & all operations, hereinafter referred to as Transcom*) is committed to the **highest possible standards of openness, honesty, integrity, ethics and accountability**.

However, we acknowledge that all organizations face the risk of their activities going wrong from time to time, or of unknowingly harboring malpractice. By encouraging a culture of openness, honesty, ethical behavior and accountability within the organization, we believe that we can help prevent such situations occurring. We not only expect all staff to maintain the highest possible standards in accordance with our code of conduct themselves but also to report any malpractice that falls short of these fundamental principles.

We expect employees and others that we deal with who have **serious & genuine concerns** about any aspect of the company's work to come forward and voice those concerns. We would like to ensure via this policy that employees and others that we deal with are confident that they can raise these concerns without fear of reprisals, in the knowledge that they will be taken seriously and that the matters will be investigated appropriately **on a confidential basis**.

Objective & Scope

The objective of the policy is to provide a procedure under which individuals, who have **reasonable grounds to believe** that an incident of work place malpractice is **occurring or is likely to occur** within Transcom, are able to raise their concerns.

The policy applies to

- Transcom's employees;
- Agency workers,
- Contractors and home agents.

Definition of malpractice

For the purposes of this Whistleblowers Policy, Transcom considers the following matters to constitute malpractice:

- An unlawful act, whether civil or criminal, being committed, or is likely to be committed; or
- Breach of the Transcom Code of Conduct; or
- Breach of or failure to implement or comply with any Transcom policy; or
- Unprofessional conduct not complying with established standards of practice; or
- Questionable accounting, fraud or auditing practices; or
- Manipulation in operational performance reporting; or
- Abuse of power or authority for any unauthorized or ulterior purpose; or
- Unfair discrimination in the course of the employment or provision of services; or

- Conflicts of interest.

The Policy does not cover concerns about poor or unfair management, inefficient systems or other operational feedback. Employees wishing to raise issues relating to these areas should do so either by contacting their manager or if they believe it is appropriate to the HR department.

Transcom is committed to ensure that any incident of work place malpractice is prevented wherever possible, and immediately dealt with, should they arise.

Protection

Any individual making a disclosure or raises a concern under this Policy will be protected if the individual:

- Discloses the information in good faith
- Believes it to be substantially true
- Does not act maliciously nor makes false allegations
- Does not seek any personal or financial gain

However, it is important for anyone contemplating making allegations to ensure that they are **sincere and substantiated**. No allegations should be made maliciously or with the knowledge that they are false.

Any abuse of this policy, by raising deliberately false, unfounded or malicious allegations with personal interest will mean that the individual loses the protection provided under this policy and may result in disciplinary action, up to, and including dismissal for cause.

Whistle-blowing Procedure

An individual should raise reportable matters with someone who is in a position to address them appropriately. In most cases, an individual can raise such matters with the departmental manager who will usually be in the best position to help.

We recognize that there may be circumstances where an individual feels unable to approach a departmental manager and in these circumstances we recommend to raise the reportable matter directly with the local Head of HR, Country Manager or Responsible member of the Executive Committee (Individual should evaluate the appropriateness of reporting in that order).

Further, we require the following:

- a. The individual formalizes their concerns in a formal 'whistle blower report'. Refer the Appendix of this policy for PDF reporting format.
- b. All reports are sent to the appropriate personnel with a copy to whistleblower.reporting@transcom.com. It goes to the President/CEO of TWW

Group and the Head of Internal Audit (*who reports independently to the Board and/or it's Audit Committee*).

Recommended structure of a Whistle Blower Report

1. What has happened? Where has this happened? Please be as detailed as possible.
2. Who was involved?
3. Is this expected to happen again and if so, when and where?
4. Which other persons may have knowledge of the above mentioned or may have access to relevant information?
5. Is there any documentation or evidence available that may serve as evidence? If so, please include this information.
6. Is there any other information that may be relevant or useful for the investigation or otherwise?
7. If reported to higher levels, why was it reported to this level, highlighting why the preceding recourses were not deemed appropriate.

We recommend you to utilize the standard whistle blower reporting template available in the Appendix of this policy. Please contact your HR or whistleblower.reporting@transcom.com for the template. The same is also available on the Transcom intranet.

Investigation process

Transcom is committed to investigating malpractices fully, fairly, quickly and confidentially where the circumstances permit. The length and scope of the investigation will depend on the subject matter of the concern.

Investigator can on its own escalate the concerns to the next recourse, when deemed fit, based on the initial assessment & gravity of your concern. Where appropriate, the concerns may be:

- Referred to Chairman of Transcom's Board or it's Audit Committee;
- Referred to an independent auditor
- Referred to the Police or other law enforcement authorities

In order to protect the individuals involved and those suspected of the alleged wrongdoing, an initial enquiry will be made to decide whether a detailed investigation is appropriate and, if so, what form it should take. If urgent action is required; this may be taken before any investigation is conducted. The overriding principle, which Transcom will have in mind, is the interest of the Company and its shareholders.

The employee will, unless circumstances do not permit it, be told what action Transcom has decided to take and must treat any such information with the strictest confidence.

Confidentiality

We recognize that concerns made under this policy may involve highly confidential and sensitive matters and that an employee may prefer to make an **anonymous reporting**. We regret that we cannot guarantee to investigate all anonymous allegations. Proper investigation may prove impossible if the investigator cannot obtain further information or ascertain whether the disclosure was made in good faith. It is preferable for whistleblowers to reveal their identity and measures can be taken to preserve confidentiality if appropriate.

It is necessary that before making any external disclosure to regulatory/grievance authority, you must utilize the final recourse & should have given at least twenty one days before taking such action. This policy is for guidance only and does not form part of any contract of employment.

Reference

We recommend you to refer the following also:

- Code of business conduct
- Supplier code of business conduct
- Standard whistleblower reporting template

Appendix



Transcom Whistle
Blower Complaint form