

## 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, 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 inform its employees, agents and subcontractors of its commitment to our Supplier Code of Business Conduct and educate them accordingly.

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. We sincerely hope that you share this conviction and that you, as one of our network of business partners, will accept and apply the terms of the Transcom Supplier Code of Business Conduct within your organisation.

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## **Supplier Code of Business Conduct**

### **1. COMPLIANCE WITH LAWS**

As a basic principle 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.

### **2. HONOURING 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.

### **3. LABOUR STANDARDS**

Our suppliers must ensure that forced, compulsory or child labour 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.

### **4. DISCRIMINATION**

Our suppliers must be committed to providing an equal-opportunities work environment, where discrimination on grounds of race, colour, 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.

### **5. HARASSMENT**

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

### **6. 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.

### **7. WORKPLACE SAFETY**

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

### **8. 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 minimise 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 behaviour change among their workforces by promoting environmentally friendly behaviours in the workplace.

## **9. ETHICAL CONDUCT**

Transcom expects its suppliers to apply the highest standards of integrity in all business interactions. 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.

## **10. 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.

**11. 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 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 my company agrees to abide by the stipulations detailed within it.

**Name:**

**Position:**

**Signature:**

**Date:**