

## Code of Conduct

### ***Introduction***

Truecore AB is a growing business partner of telecom operators. By facilitating the re-use of fully functional network equipment that would otherwise be disposed of, we give people access to mobile communications with a low environmental impact.

This Code of Conduct establishes Truecore's vision and the standards of behaviour that will guide us within the areas of business ethics, labour standards, environment and human rights.

Truecore's Code of Conduct is based on the International Bill of Human Rights, the eight Core Conventions of the International Labour Organisation (ILO) and industry best practice. We support the ten principles of the United Nations Global Compact as well as the OECD Guidelines for Multinational Enterprises.

Truecore expects all employees, suppliers and business partners to adhere to the same or equivalent principles as the ones outlined in this Code of Conduct. We believe that trust through long-term relationships is key in driving positive development, and strive to work together with our stakeholders to contribute to sustainable development.

### **Enhancing sustainability through customer satisfaction**

In many parts of the world, phased-out network equipment is disposed of even though it is perfectly functional. The disposal of functioning equipment is an inefficient use of resources that brings costs for operators and society and has a negative environmental impact. Truecore instead invests in this second-hand equipment, which reduces the environmental impact and enables operators to cut de-installation and scrapping costs.

Moreover, by ensuring that second-hand equipment is re-used in regions where access to mobile communications is underdeveloped, Truecore has a positive impact on economic and social development in those regions. In this way, our commitment to keep customers satisfied is also a promotion of sustainable development and consumption.

### ***Business ethics***

Truecore is committed to act with the highest level of responsibility, accountability and transparency. As a company active in many different markets around the world, our aim is to embody the importance of doing business in an ethical and sustainable way. We make business decisions based on the best interests of the company rather than personal considerations or relationships, and avoid situations in which our personal interest may conflict with, or even appear to conflict with, the interests of the company.

### **Anti-corruption**

Truecore adheres to the Code on Gifts, Rewards and other Benefits in Business (2012) developed by the Swedish Anti-Corruption Institute. We have zero tolerance towards all forms

of corruption, including bribery and extortion. No form of extortion and bribery, including improper offers for payments to or from individuals performing work for Truecore, is tolerated.

### **Use of company assets**

Truecore's financial and non-financial assets are to be used in a secure and responsible manner. Such assets include, but are not delimited to, business-critical information, cars and phones.

### **Data protection**

Protection of customer privacy and data is fundamental for Truecore's ability to conduct business. Truecore has, and is committed to keep developing, robust procedures and systems for secure data storage and data protection. We sign Non-Disclosure Agreements with all customers.

### **Use of agents and contractors**

Truecore operates through an international network of sales agents and project contractors. We will only cooperate with agents and contractors that have passed a due diligence review in line with the Code on Gifts, Rewards and other Benefits in Business (Swedish Anti-Corruption Institute, 2012).

All agents that conduct sales or other activities on behalf of Truecore must adhere to full transparency in their relationship with us. Truecore will not work with agents who do not provide full access to their correspondence with existing and potential clients.

### **Human Rights**

Truecore is committed to respect all internationally proclaimed human rights throughout our operations and to maximise our positive contribution to the enhancement of human rights.

We believe in the power of mobile communications to strengthen economic and social development, thereby enhancing human rights. Mobile communications can boost local businesses, promote financial inclusion and advance access to essential services and freedom of expression. By enabling the re-use of second-hand network equipment in new areas, Truecore aims to strengthen human rights by giving new groups of people access to mobile communications and better conditions of economic and social development.

### **Labour Standards**

#### **Health and Safety**

Truecore seeks to ensure a safe and healthy work environment and avoid any harm to employees and contractors in the workplace. We ensure frequent dialogue with all employees and contractors to ensure that their needs are covered. We keep track of all recorded incidents and ensure proper follow-up. We also promote a workplace free from alcohol and drugs.

### **Working conditions**

Truecore guarantees that all working conditions comply with all statutory requirements. All employees have the right to have written contracts, in a language that they can easily understand, specifying their terms of employment.

Contracted agents have flexible working hours and are free to manage the number of worked hours on their own. The normal work week should not exceed 48 hours. Overtime should be voluntary, and working hours including overtime should not exceed 60 hours per week.

### **Discrimination**

Truecore treats every employee and contracted agent with respect and dignity. Discrimination based on ethnicity, sex, religion, social background, handicap, political opinion or sexual orientation must not occur.

### **Child and forced labour**

Truecore does not tolerate use of any form of forced or child labour.

### **Freedom of association and collective bargaining**

All employees have the right to freedom of association and are entitled to collective wage negotiations. Information and consultation with employees can be done through formal arrangements or, if such do not exist, other mechanisms may be used.

### **Compensation**

Truecore adheres to Swedish regulations and standards in terms of compensation to employees. For contractors, a flexible remuneration scheme is applied. The scheme is tied to the individual agent's freedom to choose his or her amount of work. At a minimum level, Truecore pays a retainer to all contracted agents that covers general expenses.

### **Professional development**

Our success as a company depends on having access to the right people with the right competence. Truecore will continuously develop processes for supporting our employees and contractors in their professional development, including training and performance reviews.

### ***Environment***

Truecore is committed to reduce negative environmental impacts from the ICT sector as well as in our own operations. This is implemented by enabling the re-use of second hand network equipment and minimising the negative impact from the transport of goods.

### **Products, materials and waste**

Truecore is committed to reducing our environmental impact by only selling second-hand equipment and by not conducting any manufacturing. We strive to minimise the use of paper and other supplies in our office areas and work to recycle all our waste. Packaging materials should, to the highest degree possible, be made of recycled materials.

## **Energy**

We strive to reduce energy consumption throughout our operations.

## **Transport and emissions**

Transportation of goods should be conducted in a manner that reduces environmentally degrading emissions to water and air, including CO<sub>2</sub>, to the greatest extent possible. Transportation loads should be optimised in order to avoid unnecessary environmental impacts. We also adhere to the principle of closeness, which means that we should always seek to avoid unnecessarily lengthy journeys.

Our employees should, to the highest degree possible, choose public transport or other environmentally friendly means of transportation for business trips.

Storing of products and materials should be done in a resource-effective manner.

## **Sourcing**

Truecore expects all suppliers to adhere to principles outlined in this Code of Conduct and only work with suppliers that we think share our values. We believe in long-term relationships and engage in continuous dialogue with our suppliers on sustainability issues.



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