

sinch



Code of Conduct

Version 2.0 – 2020

sinch.com



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A Message from Our Chief Executive Officer

Dear Sinchers!

We are growing fast and are today around 700 employees in more than 30 countries. Our diverse global team bring different experiences and perspectives to the business. The technology evolution creates new opportunities for us with new markets, but also more challenges. Sinch brings businesses and people closer with tools enabling personal engagement. We couldn't do it without the support and dedication of our customers, colleagues and shareholders. With that comes responsibility.

A common thread in Sinch has always been to do business in an ethical and proper manner and to expect our business partners to behave in the same way. Our Code of Conduct applies our values to the challenges we face as our business expands and should serve as a guide for successfully navigating any ethical challenges we may face.

This means that we must be prepared to say no to entering into transactions and deals that doesn't fulfill our ethical standard. This is expected by our shareholders and board of directors, but also by our customers.

At all times, we shall work hard to achieve our business goals, but even if that fails we may never compromise on our ethical standards.

I expect everyone to live up to the values manifested in our Code of Conduct and encourage everyone to speak up if illegal or unethical behavior within Sinch or in our dealings with others are observed.

Stockholm 18 December 2019

Oscar Werner

President and Chief Executive Officer



1. Introduction

The Sinch Code of Conduct applies to Sinch AB (publ) and all its subsidiaries from time to time (referred to as “**Sinch**”).

All Employees must follow this Code of Conduct when conducting business and in relationship with colleagues, customers, suppliers and other contacts. You must also comply with applicable law and Sinch’s policies, manuals and instructions. If that doesn’t exist, you shall act in the best interest of Sinch. If you are in doubt regarding how to act, you shall consult your manager.

Sinch is a signatory to UN Global Compacts and is committed to adhere to its 10 Principles.

Sinch cares for the environment through its commitment to good environmental practices.

Sinch believes to have made, and will continue to make, proper provision for the health, safety and welfare of its Employees at work and others who may be affected by Sinch’s activities.

Sinch strives towards achieving high standards of business conduct and we expect the same approach from those with whom we do business.

This Code of Conduct applies to all employees at Sinch and everyone acting on behalf of Sinch, including the Board of Directors (referred to as “**Employees**” or “**You**” below). We expect all our vendors, suppliers, contractors and other partners to commit and uphold the same high ethical standards that we follow ourselves.

2. General Conditions

2.1 Application of Rules

Any Employee who, despite instruction, does not comply with this Code of Conduct can be warned or be removed from his/her duties, in accordance with applicable local labor legislation.

2.2 National Law

Sinch shall comply with applicable local laws. Where the provisions of applicable local laws and this Code of Conduct address the same subject, and are not in conflict, the highest standard shall be applied if not in conflict with applicable local laws.

2.3 Internal Control, Financial Reporting and Authority

Internal controls, including authority to represent and make commitment on behalf of Sinch, shall ensure that business processes are effective and carry an acceptable level of risk, that physical and intangible assets are safeguarded and utilised, that financial information is correct, complete and timely, and that laws, regulations and guidelines are followed.

You may only enter into a commitment if you hold authority to do so. The limits of your authority must not be exceeded.

Sinch integrity depends on the accuracy and completeness of our financial records. Fraudulent or deceptive reporting destroys the trust placed in Sinch by investors, partners and other stakeholders. We



must report accurately, reliably, transparently, consistently and timely, and apply good accounting practices.

2.4 Responsibility for this Code of Conduct

The Group CEO is the owner and ultimately responsible for this Code of Conduct and he has delegated to the Chief Financial Officer and the General Counsel to be overall responsible for its implementation in Sinch.

All managers are responsible for ensuring that this Code of Conduct is enacted through integration into Sinch's normal management systems; each department head is responsible for implementing and communicating this policy to the employees within its own business units.

Against a background of evolving business and legal requirements each unit is expected to adapt their activities where necessary to comply with applicable laws and regulations and be consistent with maintaining Sinch's high standard of ethics.

3. Procurement

Key suppliers, subcontractors and other parties that have a direct contractual relationship with Sinch should adhere to Sinch Supplier Code of Conduct or adhere to the "Electronic Industry Citizenship Coalition (EICC) Code of Conduct".

Sinch Supplier Code of Conduct is used in Sinch procurement assessment when selecting suppliers and subcontractors.

4. Labor Standards and Human Rights

4.1 Human Rights

Sinch shall support and respect the protection of internationally proclaimed human rights. Sinch shall make sure that we are not complicit in human rights abuses.

4.2 Labor Unions

As far as any relevant laws allow, all employees or Employees shall be free to form and to join or not to join trade unions or similar external representative organizations and to bargain collectively.

4.3 Forced Labor

Sinch shall ensure that all Employees shall be free to leave his/her employment or contract after giving reasonable notice.

Sinch shall ensure that no Employee shall be required to handover deposits of money, identity papers or similar in order to get or keep his/her employment or contract. The relationship between Sinch and its employees or Employees shall be free from threats.

4.4 Child Labor

Sinch shall follow United Nations Convention on rights of the Child.



Sinch shall not have any employee or hired Employees who is below the minimum legal age for employment. Minimum age is the age of completion of compulsory schooling, or not less than 15 years.

Sinch shall ensure that children are not employed for any hazardous work, or work that is inconsistent with the child's personal development. A child means a person below the age of 18 years, as defined in Article 1 of the United Nations Convention on the Rights of the Child.

4.5 Elimination of Discrimination

Sinch shall ensure that its Employees are treated with respect and dignity. Corporal punishment, physical or verbal abuse or other unlawful harassment discrimination based on partiality or prejudice is prohibited, such as discrimination based on race, color, sex, sexual orientation, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic background, social origin, social status, indigenous status, disability, age, union membership and any other characteristic protected by local law, as applicable.

Sinch shall see to it that its Employees with the same qualifications, experience and performance receive equal pay for equal work with respect to their relevant comparators.

4.6 Employment Conditions

Sinch shall ensure that its Employees have written agreements and that they understand their employment conditions. Sinch shall make sure that pay and terms are fair and reasonable and comply at a minimum with national laws or industry standards, whichever is higher. Sinch's working hours shall comply with national laws and must not be excessive.

4.7 Health and Safety

Sinch shall be committed to providing a safe working environment for its employees and Employees in accordance with internationally recognized standards.

Sinch shall do its utmost to control hazards and take necessary precautionary measures against accidents and occupational diseases. Whenever necessary, Employees are to be provided with, and instructed to use, appropriate personal protective equipment.

Sinch shall inform its employees and Employees that they have a responsibility to take reasonable care of themselves and others while at work, adhere to safety rules and work procedures, use safety equipment provided, and to participate positively in the maintenance of safe and healthy conditions in the workplace and in the task of preserving a sound environment.

Sinch shall maintain a proactive communications strategy between all employees and Employees to stimulate continuous improvement and promote and develop good health, safety and environmental practices.

Sinch shall provide adequate and regular training to ensure that Employees are adequately educated on health and safety issues.

Sinch shall secure that, where it provides accommodation, it shall be clean, safe and meet the basic needs of the Employees.



5. Intellectual Property

5.1 Intellectual Property Rights

Sinch shall ensure that intellectual property rights are to be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

Sinch shall have a process in place to make sure that no intellectual property rights are infringed.

Sinch shall ensure that its employees and Employees understand the importance of protecting Sinch's and others intellectual property rights.

Any Employee who suspects intellectual property rights infringements shall report it to Sinch General Counsel.

In case of intellectual property rights infringement, appropriate action shall be taken by Sinch to correct such infringement immediately.

5.2 Copyright Materials

Sinch shall provide employees and Employees with legally purchased copyright material determined to be necessary for Employees to perform their job responsibilities. Sinch shall ensure that its employees and Employees follow legal guidelines regarding the use of copyright material.

Sinch shall ensure that its employees and Employees learn about the copyright status of any material copied for distribution either internally or externally.

Sinch shall make sure that any employee or Employee who suspects the inappropriate use of copyright material should contact his/her supervisor.

If copyright material is being reproduced or distributed improperly, appropriate action shall be taken by Sinch to correct such improper reproduction or distribution immediately.

6. Information

6.1 Confidentiality

Information may have value for Sinch or may need to be kept confidential because it involves employees or third parties. Unauthorized access to such information may impair the value and have a negative impact on Sinch's reputation. If confidential information is to be shared with external parties, it is all employees' duty to ensure that a written confidentiality agreement is in place between Sinch and such external party.

Caution shall be exercised when discussing internal affairs to avoid being overheard by unauthorized persons.

6.2 Disclosure of Information

Information from Sinch shall be reliable and correct, and meet high professional and ethical standards.



Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

Public authorities shall be met in an appropriate and open manner. Communication with the media, the public and the financial markets shall take place in accordance with established procedures in compliance with the regulations and practices applicable to publicly listed companies.

Public information about Sinch shall only be communicated by the person responsible for public communications as per authorization.

Employees who participate in public debates are obliged to make sure that they clearly distinguish between their role as a private citizen and of that as an employee of Sinch.

6.3 Public and Social Media

Representatives of Sinch may participate in public debates which are of importance to Sinch's strategy and business performance but Sinch does not take political positions or associate with political movements, nor shall Sinch give financial support to political parties.

Sinch recognizes that its Employees utilize social media as a medium of self-expression, but we are all personally responsible for the content that is being published. Sensitive or confidential information that belongs to Sinch, for instance revenues, future products, pricing decisions or unannounced financial results must only be published by those specifically authorized to do so.

External questions about Sinch from journalists or media shall be redirected to persons who are formally authorized to speak on behalf of Sinch.

6.4 Insider Information

As a publicly listed company, Sinch is subject to strict rules concerning the handling of sensitive information that may affect the market price of securities issued by Sinch ("**Insider Information**"). It is a requirement that investors, analysts and other relevant parties get access to sensitive information at the same time to ensure equal treatment and equal opportunity to act on such information. In general, information is considered to be sensitive if a reasonable investor would be likely to use the information as part of the basis of its investment decisions.

Sinch shall comply with laws and regulations applicable to dealing with securities.

It is the duty of all Employees who are aware of Insider Information to keep it confidential until it has been received by the stock exchange and made available through the stock exchange's information system, or until the information ceases to be sensitive.

Any employee who receive Insider Information that may affect the pricing of securities, shall not trade in such securities before the information has been made public or ceases to be sensitive. Such information must not be provided to anyone, directly or indirectly, except those who have been authorized to receive such information to perform their duties for Sinch.

Any employee who has sensitive information and are in doubt on how to act shall consult with Sinch's General Counsel.



6.5 Information Security

All Employees must adhere to Sinch's Information Security Policy, instructions and guidelines to ensure a professional work environment, network and data security, and comply with applicable laws while using internal IT systems and the Internet.

6.6 Personal Data and Privacy

Sinch recognize that privacy is important to its customers, users and employees and is committed to fulfill high standards in relation to personal integrity, including to respect and safeguard the privacy of any private individual's personal data. Sinch's processing of personal data shall be subject to the care and awareness which is required according to laws and regulations. Processing of personal data shall be limited to what is needed for operational purposes, efficient customer care, relevant commercial activities and proper administration of human resources.

Sinch shall only collect, process, and store personal data for legitimate business purposes and keep such data no longer than necessary for the purposes for which any data was collected. Sinch shall ensure security and privacy of any personal data it processes. Sinch shall use adequate physical, electronic and administrative procedures in order to prevent disclosure, unauthorized access and to maintaining data correctness.

7. Environment & Sustainability

7.1 General

Sinch shall ensure that finite resources are used responsibly and carefully. Sinch shall strive to minimize its environmental impact.

Sinch shall maintain operational practices that reduce any environmental burden associated with our activities.

Sinch shall continuously improve and seek innovative environmentally friendly solutions in products and services.

Sinch shall act in accordance with relevant local and internationally recognized environmental standards, and also follow local laws and regulations.

7.2 Energy Consumption

Sinch shall actively look for more power efficient solutions in hardware installations, for instance it could be to choose virtual servers, cloud solutions or selecting hardware with low energy consumption whenever possible.

Sinch shall take measures to reduce energy consumption in offices, such as automatic light switches, printers and copiers in energy save mode. When replacing electrical equipment, modern models requiring less energy shall be selected.

Sinch shall promote sustainable travel, i.e. if possible, use web meetings rather than travel for physical meetings. When travelling is needed, if possible public transportation shall be used and train or bus chosen over going by air when feasible.



7.3 Waste Reduction and Recycling

Sinch shall take measurements to reduce waste and cover approved disposal techniques protecting the environment.

Paper, cardboard, plastic, glass, cans, printer toner cartridges, and batteries shall be recycled, and food waste, paper, utensils, and compostable food containers shall be composted when possible.

8. Fair Business Practices

8.1 Professionalism and Conduct

Sinch Employees must in all respects act professionally in their dealings with any business contact.

Sinch shall only accept such agreements and assignments that we have the competence and resources to fulfill.

Sinch must refrain from creating unrealistic expectations from its business partners.

8.2 Conflicts of Interest

All employees must put the interests of Sinch and the customers before own personal gain. Everyone should avoid situations that creates or appear to create conflicts of interest with Sinch. The appearance of a conflict or unethical behavior can be just as damaging to Sinch's reputation as an actual conflict. Sinch prohibits employees from using their position at Sinch for improper personal gain. A conflict of interest may arise when personal interests, activities or relationships affect an individual's responsibilities and loyalty to Sinch.

Any employee who believes a conflict of interest may exist, whether actual, perceived, or potential, must immediately contact a manager, Human Resources, or Sinch General Counsel.

8.3 Gifts and Hospitality

At Sinch we shall earn business the right way and no Employee shall, directly or indirectly, offer gifts to customers, vendors, partners or others, or to representatives, or anyone closely related to these, unless the gift is of modest value.

Hospitality, such as social events, meals or entertainments may be offered and received if there is a business purpose involved, and the cost is kept within reasonable limits.

Gifts and hospitality shall not be offered or received in situations of contract negotiation, bidding or award. When dealing with public officials, gifts and hospitality shall be avoided.

8.4 Corruption and Bribery

Sinch has zero tolerance and is firmly opposed to all forms of corruption. This is not only a legal obligation but also an ethical standpoint. Sinch employees shall never offer, give, ask for, accept or receive any form of bribe. A bribe occurs when someone attempts to influence a third party's decision by offering an improper advantage. In some countries government officials commonly request "facilitating payments", which are payments made to government officials to expedite performance of a routine, non-discretionary government action. Sinch strictly prohibits all facilitating payments.



Sinch shall not use agreements with middlemen to channel payments to anyone to facilitate corruption and all employees shall exercise due care with respect to the selection and use of business partners so that Sinch does not become involved in corrupt activities.

Any observation of suspected corruption shall be reported as stated under Article 9, Reporting, below.

8.5 Financial interests

Sinch Employees may not accept commissions, compensation or other benefits from customers, suppliers or business partners without Sinch's knowledge and permission. This is also applicable for third parties that can influence Sinch's business relationships.

8.6 Money Laundering

Sinch shall not be involved in any form of money laundering. Sinch shall take necessary measurements to make sure its financial transactions cannot be used by others to launder money.

8.7 Competition

Sinch believes in fair competition and the proper operation of a free market system, and Sinch's competitiveness in the market shall be based on good products and services at the right price.

In dealing with customers, suppliers, partners and others, Sinch employees shall not cause or be part of any breach of general or special competition regulations, such as illegal cooperation on pricing, illegal market sharing or any other behavior that is in breach of relevant competition laws.

9. Reporting

Sinch is determined to nurture a culture where employees feel confident to share ethical dilemmas and speak up about possible breaches of this Code of Conduct.

Employees shall immediately report any act that is likely to constitute a breach of this Code of Conduct directly to a manager, Human Resources, or to Sinch General Counsel. You may also send your report to Sinch's *Integrity Reporting Line* below, which is routed to the General Counsel. All reports will be handled confidentially.

Sinch does not tolerate any form of retaliation against individuals who report violations or suspected violations of this Code of Conduct in good faith.

For any Reporting, Concerns or Questions, please don't hesitate to send a message to Sinch's Integrity Reporting Line at compliance@sinch.com!



Confirmation

Name: _____

Hereby I confirm that I have read and understood Sinch Code of Conduct.

Date/location: _____

Signature: _____
