

Third Party Code of Conduct

Approved on
16.12.2021

Approved by
Board of Arelion AB

(earlier registered under corporate name OuraBidCo AB)

Owner
Arelion Legal Affairs

Version

(1)

Content

1 Introduction.....	1
2 Anti – bribery and corruption – Business ethics.....	2
3 Human Rights	3
4 Labor Rights.....	3
5 Occupational Health & Safety	3
6 Environment.....	4
7 Compliance.....	4

Introduction

Arelion Sweden AB and its affiliates (collectively “Arelion”) is a provider of international telecommunications services on the wholesale and corporate markets through worldwide infrastructure and presence in more than thirty countries. In its operations, Arelion is committed to running its business ethically and responsibly from social, environmental, and professional perspective and strives to conduct business in line with such commitments.

Respectively, when interacting with third parties such as suppliers, vendors, interconnect partners, agents, consultants, contractors, recipients of donations and sponsorships or other service providers (collectively “Third-Parties”, individually “Third-Party”), Arelion expects Third Parties to operate in compliance with all applicable laws and regulations to fulfil all contractual obligations, and has a strong preference to work with Third-Parties that share its commitment to ethical and responsible business conduct and the values and principles described in this Third-Party Code of Conduct.

While applicable national or local customs, laws, rules and regulations may vary by country, a number of international declarations, conventions and guidelines on human rights, labor rights and conditions, environmental responsibility and anti-corruption (e.g. the UN’ Universal Declaration of Human Rights, the Core Conventions of the ILO, the OECD Guidelines for Multinational Enterprises, the UN Guiding principles on Business and Human Rights and the United Nations Global Compact Principles) demonstrate that ethical and responsible business practices are a global matter of concern and have become a guiding force in doing business throughout the whole supply chain.

The enclosed “Third-Party Code of Conduct” (referred to herein as the “Code”) is intended to reflect that importance and to provide guidance on Arelion’s expectations in doing business with Third Parties.



In all areas covered by this Code, Third Parties shall operate in compliance with the laws, rules, and regulations of the countries in which it is doing business. In relation to values and principles of ethical

and responsible business practice in the areas covered by this Code, Third Parties are also encouraged to promote social and environmental responsibility and business ethics.

As applicable, Third- Parties may validly choose to abide to its own code of conduct to the extent such code provides equivalent or similar guarantees and goals as in the enclosed Code. A copy of such code shall be provided to Arelion in such case.

When doing business with Arelion, it is our expectation that your company will fulfil all legal, regulatory and contractual obligations and will strive to act in a manner that is consistent with the Code (or its own code as the case may be) in connection with the deliverables that it provides and under the scope of the applicable framework agreement, service agreement, order form or other equivalent business arrangement, without prejudice to further specific requirements, as appropriate, that Arelion and your company may agree to from time to time.

Anti – bribery and corruption – Business ethics

Third-Party is prohibited from engaging in any form of corruption and commits to conduct its business operations in an ethical manner by maintaining a culture of integrity, transparency, openness and compliance with applicable law, regulations and all contractual obligations with regards to:

- Prohibition of corruption in all its forms, including but not limited to prohibiting extortion, solicitation, bribery of public officials, private sector bribery, negligent financing of corruption, facilitation payments, nepotism, fraud and money laundering.
- Prohibiting any offer, promise, gift, request, agreement to accept, receipt of payments, any kind of undue benefits, charitable or political donations, directly or indirectly, to obtain or retain personal or business advantage from any public official, individual, employees or business partners.
- Establishing an adequate anti-corruption program and internal controls based on a risk assessment, considering corruption risks such as the geographical and industrial sector of business operation.
- Establishing policies to address conflicts of interest involving its employees arising from financial interests in business partners, individuals serving as government officials at public bodies or state-owned enterprises with jurisdiction over or dealings with Third-Party's business operations or personal family affiliations between its employees and those of its business partners; and
- Conducting business operation in line with fair competition (e.g., preventing bid rigging or other mechanisms limiting fair competition in tenders or any form of cartel practices with competitors).

Without prejudice to the above, it is understood that conducting business under certain conditions and market may require the Code be supplemented by specific anti-bribery and corruption provisions, which provisions will be included in the agreement as applicable.



Human Rights

Third-Party commits to upholding human rights within its business operations and to treat its employees with respect and dignity and to comply with all binding legal, regulatory or contractual obligations with regards to:

- Protection of privacy rights, particularly in relation to handling of personal data which may be subject to specific national or supra national regulations including but not limited to the General Data Protection Regulation (“GDPR”) in the EU/EEA area; and
- Seeking to address any potential or actual adverse human right impact arising from its business operations by taking appropriate steps to avoid and/or mitigate them.

Labor Rights

Third-Party commits to uphold reasonable labor terms of employment and standards, and to provide a reasonable work environment for its employees regarding conditions of freedom, equality, security and dignity and to comply with all binding legal, regulatory or contractual obligations concerning employment practices and workplace conditions, with regards to:

- Applying employment terms and conditions in line with all requirements set by national laws and regulations and providing fair employment conditions and rights for the employees from onboarding to termination (including to prevent illegal, clandestine and undeclared employment, prohibition and/or protection of child labor and prohibition of forced labor);
- Securing reasonable working hours (with at least, time off and leave periods allowed for employees, non-excessive overtime hours);
- Securing labor rights with regards to living wages and benefits in line with collective bargaining agreements or at least equal to the average minimum in the relevant market sector, as applicable;
- Prohibition of harassment, abuse and discrimination of any kind;
- Supporting diversity, equal opportunities, prevention of discrimination or abuse of any kind in hiring and in any other employment practices, and
- Respecting and recognizing, as applicable, freedom of association and promotion of open communication between employees and management.

Occupational Health & Safety

Third-Party commits to provide and maintain a safe and healthy workplace for its employees, visitors and any sub-contractors working in its premises on its behalf and to comply with all binding legal, regulatory or contractual obligations with regards to:

- Prevention and protection against workplace hazards and risks to avoid work-related accidents or bodily injuries, including during the operation of equipment or during work-related travel;
- Providing reasonable and fit for purpose workplace and premises conditions;



- Providing appropriate emergency situations preparedness, procedures and trainings to detect, avoid, and mitigate hazards that constitute a risk to the health, hygiene, and safety of staff; and
- Performance of report and investigation of health & safety incidents.

Environment

Third-Party commits to operate in an environmentally and socially responsible manner and to comply with all binding legal, regulatory or contractual obligations, with regards to:

- Compliance with applicable environmental regulations enacted to regulate air emissions, solid and waste-water disposal, proper use and disposal of hazardous substances;
- Managing consumption of energy, water, paper, and other resources used in day-to-day operations in a responsible manner; and
- Reducing environmental impact from transportation.

Compliance

As part of Arelion's efforts to do business in an ethical and responsible manner, Arelion expects that Third-Party will have in place adequate internal business processes, systems and controls to promote the values and principles set forth in this Code and, more generally, securing compliance with all applicable laws, regulations and contractual obligations in the areas covered by this Code.

Prior to the commencement of provision of Services to Arelion and anytime during the term of the applicable agreement, as may be required from time to time, Third-Party agrees, upon request, to participate in a self-assessment due diligence process organized by Arelion and to provide information and data related to its compliance with, and the measures adopted (including copies of records or written statements), to ensure compliance with this Code. As applicable, Third-Party shall also provide information and data to Arelion for annual reporting purposes and other reports required by local regulations.

Third-Party shall promptly inform Arelion if it is unable to continue to comply with this Code or discovers a breach or suspected breach of any applicable legal, regulatory or contractual obligation in connection with the provision of Service to Arelion in the areas covered by this Code or if Third-Party cannot act in a manner consistent with the values and principles set forth in this Code. For any identified non-compliance with the Code, Third-Party shall provide a corrective action plan to Arelion within an agreed timeframe.