

Code of Conduct

for Business Partners

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Code of Conduct for Business Partners

Tre and Hallon

Our vision is to "Set People Free", and we continually strive to develop services that further enhance and simplify the experience for our customers, while advancing digital infrastructure. Therefore, we carefully choose our business partners and make sure that our ethical and moral compasses align.

This code of conduct clarifies our goals and ambitions in business, and what we require from our business partners and what we encourage our business partners to do.

Whistleblowing

Hi3G have an open and transparent corporate culture and encourage all our Business Partners to speak their mind and speak up if there is something wrong. Violations of the Code should be reported to Hi3G, directly to our compliance officer (compliance@tre.se) or through our "speak-up-channel", where reports can be made anonymously.



Who we are and how we play

Tre (Hi3G Access AB, 556593-4899) was founded in December 2000 by CK Hutchison, which owns 60% of the company, and Swedish Investor, which owns 40%, with a vision to create an entirely new platform for mobile communication. Tre is part of the 3 Group, which operates all around the world.

We believe that diversity and different perspectives are fundamental to growth and contribute to a freer life and a more sustainable society. Our strength lies in our network, where we have invested – and continue to invest – billions to ensure our customers receive the best network experience wherever they are. Our goal is to grow as a company, challenge the market, evolve our corporate culture, and be a fair and inspiring workplace. **This has always been our approach.**

We think like **Challengers**

We work like **Champions**

We act like **Buddies**

Purpose and scope

This code of conduct (the “Code”) clarifies our goals and ambitions, what actions we encourage and what we require from our business partners. It is based on international charters and conventions such as the United Nations Declaration on Human Rights, The Ten Principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the International Labour Organisation Core Conventions, and our internal policies and procedures, such as our sustainability policy and our Code of Conduct.

It applies to resellers, corporate clients, suppliers, including their parent, subsidiary or affiliate entities as well as their respective employees and agents and other business partners who conduct business with or perform services on behalf of Tre (collectively referred to as "Business Partners"). Our Business Partners are responsible for ensuring that the content of the Code is communicated, understood, and adhered to within their organization, and that employees are encouraged to report any behaviours that are not in line with the Code.

For the purposes of the Code, the terms "staff" or "employees" are understood to include all individuals, such as employees and consultants, regardless of whether their employment or engagement with the Business Partners is permanent or temporary.

The Code shall be deemed an integral part of the agreement or agreements entered into between Business Partner and Hi3G. A breach of a requirement in the Code is consequently considered a breach of such agreement(s). Our main objective is to work together with our Business Partners to correct non-compliance with the Code, for example by jointly developing an action plan aimed at correcting non-compliance.



General

We require Business Partners to:

- Follow all relevant laws, regulations, international conventions and charters. In situations where local laws are less restrictive than this Code, the Business Partner must comply with the Code, even if the Business Partner's conduct would otherwise be legal. On the other hand, if local laws are more restrictive than the Code, the Business Partner must always, at a minimum, comply with those laws. Furthermore, we require Business Partners to adhere to high ethical standards and avoid engaging in any activity that involves even the appearance of impropriety.

- Ensure that all the requirements in this Code or similar are reflected in writing with the Business Partner's contract with their suppliers and subcontractors. Additionally, the Business Partner is required to disseminate and educate their employees, subcontractors, and suppliers about the Code's requirements. Furthermore, the Business Partner shall ensure that all requirements of the Code are complied with by their suppliers, and subcontractors and regularly assess themselves and their suppliers and subcontractors for compliance.

- Address and correct non-compliance issues such as developing a corrective action plan to align its operation with the Code. Additionally, the Business Partner is required to communicate non-compliance with the Code with Tre (compliance@tre.se).

- Within the scope of assessing compliance with the Code, Business Partners shall collaborate openly and truthfully with Hi3G, including completing self-assessments, participating in interviews and allowing Hi3G staff, or a third party chosen by Hi3G, access to relevant facilities and information for on-site audits, provided that such audits and information exchange comply with applicable laws.

- Upon request from Hi3G, disclose data related to direct and indirect carbon emissions and information regarding workers in the value chain, including but not limited to working conditions and other labour-related rights, to enable Hi3G to comply with applicable sustainability reporting regulations.

Ethics

Antitrust, Anti-money laundering Anti-Corruption and Anti-bribery

We require Business Partners to:

- Maintain high integrity and transparency in business dealings and comply with all applicable regulations to prevent corruption, bribery and money laundering. Additionally, Business Partners are required to comply with applicable fair trade, competition and anti-trust laws and to avoid practices that restrain trade or harm market competition.
- Conduct business in a manner that avoids situations where private, financial or other external interests conflict with the job responsibilities of the employee. Any situation where a Hi3G employee or professional under contract with the Hi3G may have a personal interest of any kind in the Business Partners business or any kind of economic ties with the Business Partner, must immediately be reported to Hi3G (compliance@tre.se).
- Implement anti-corruption policies and programs and regularly evaluate compliance with these policies and programs.
- Protect whistleblowers and, where legally required, maintain a whistleblowing function.
- Maintain internal controls to prevent the use of business operations for money laundering and report any suspicions of money laundering to the appropriate authorities.
- Not give, offer, authorize, accept, or receive any form of bribe, donation, gift, facilitation payment, or anything of value, whether directly or indirectly, intended to influence or corrupt.
- Not have any anti-competitive discussions or enter into any anti-competitive agreements, including illegal price-fixing, market sharing, customer allocation or other illegal restrictive practices, at any level of the production or distribution chain.



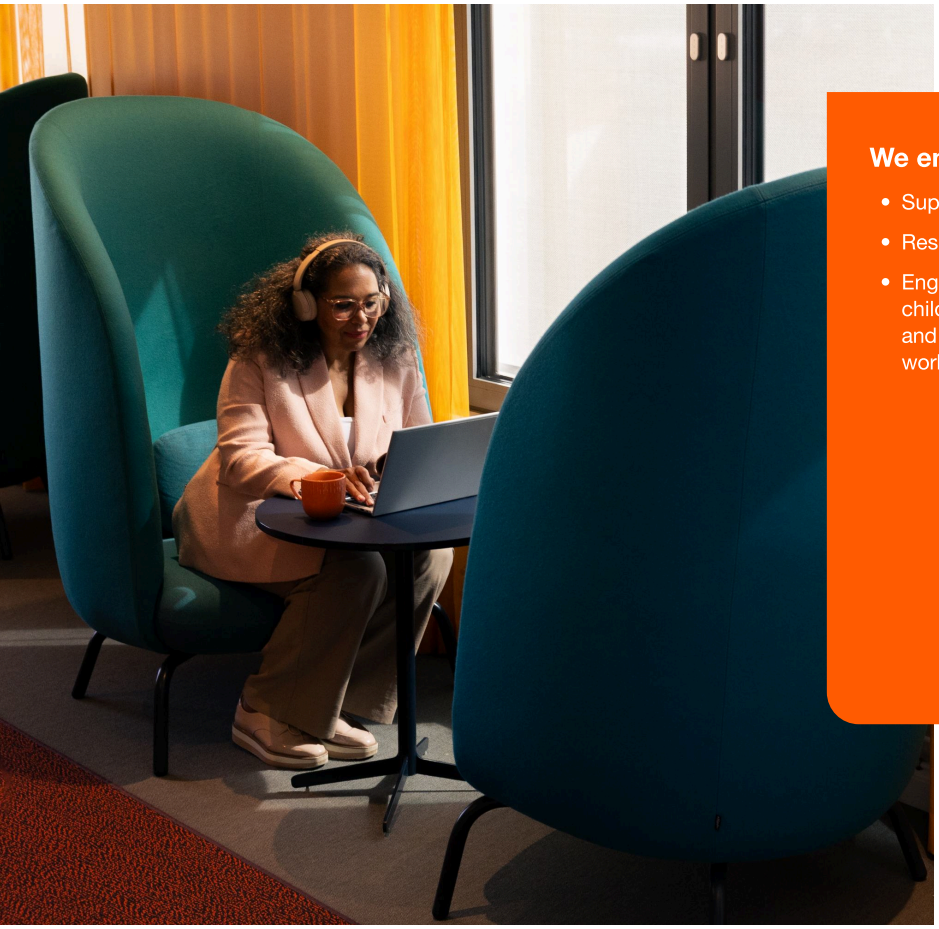
We encourage Business Partners to:

- Encourage its suppliers and subcontractors to establish their own policies, procedures and compliance-programs.
- When conducting business in Sweden: Adopt and follow IMM's "Kod mot korruption i näringslivet".
- Document all business gifts and hospitality.

Human rights, labour and non-discrimination

We require Business Partners to:

- Comply with all applicable local and national laws regarding human rights and labour, minimum wages, benefits, working conditions and working hours, including but not limited to the International Labour Organisation Core Conventions, UN Human rights conventions, and The Ten Principles of the UN Global Compact.
- Maintain a zero-tolerance policy towards harassment, bullying, and discrimination to ensure that all individuals are fairly treated and provided equal opportunities regardless of age, race, caste, ethnic or national origin, colour, mental or physical health conditions, disability, pregnancy, parent or carer role, gender, gender expression, gender identity, sexual orientation, marital status or other domestic circumstances, employment status, working hours or other flexible working, religion or belief, union membership and political affiliation.
- Identify, assess, and control potential safety hazards. If hazards remain, employees must receive appropriate personal protective equipment and access to first-aid supplies. Additionally employees must have access to clean drinking water, sanitary facilities, adequate ventilation, lighting, temperature, and acceptable noise and dust levels.
- Ensure that no forms of modern slavery or forced labor occur, including forced, bonded, or compulsory labor and human trafficking. This means that the Business Partner, along with its recruitment agencies, must not engage in or tolerate any restrictions of movement, excessive recruitment fees, confiscation of identity documents and/or passports, withholding of wages, abusive working conditions, debt bondage, violence, or any other form of exploitation or abuse.
- Prevent all forms of child labor, with a minimum working age of completion of compulsory schooling, never less than 15 years. Young employees aged 15 to 18 must not be exposed to work that could interfere negatively wit h their schooling or harm their physical or mental health, safety, or morals.
- Implement clear disciplinary measures and not use corporal punishment.
- Respect employees' rights to join trade unions and engage in collective bargaining.
- If applicable, adopt a policy and exercise due diligence on the sourcing and chain of custody of tantalum, tin, tungsten, gold and cobalt in products to ensure they are sourced in line with the “OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas” or an equivalent recognized due diligence framework.



We encourage Business Partners to:

- Support the physical and mental wellbeing of employees.
- Respect local traditions and cultures.
- Engage constructively with relevant stakeholders such as children’s rights experts, nongovernmental organisations, and industry associations to build awareness and proactively work towards.
    - Identifying root causes of discrimination if it is a widespread societal issue.
    - Sustained relations between employers and workers within the industry sectors or areas of operation.
    - Promoting and respecting human rights and children’s rights.
    - Preventing modern slavery, forced labour and child labour.



Privacy and security

We require Business Partners to:

- Comply with all applicable laws, regulations and standards relating to information security and data protection, including the handling of confidential, sensitive and personal data.
- Uphold and maintain data protection policies and programs to address and mitigate risks associated with the handling of confidential, sensitive and personal data.
- Uphold and maintain information security policies and procedures in accordance with international security standards.
- Continuously improve and enhance their information security efforts with regards to risk management, incident handling, and business continuity.
- Evaluate compliance with these policies and programs.
- Only process and share data responsibly in accordance with applicable laws and agreements with Hi3G.

Environment

We require that our Business Partners integrate environmental considerations in their operations and strive for continuous improvements to mitigate or minimize any adverse impacts to the environment.

Business Partners should:

- Comply with all applicable local and national environmental laws and regulations.
- Commit to proactively undertake initiatives to protect the environment from harm and degradation, conserve natural resources and protect biodiversity and ecosystems in relation to their operations.
- Address environmental risks arising in operations and products/ services by applying the precautionary principle and taking preventive measures as soon as there is reason to believe that an activity could harm the environment or human health.
- Establish and maintain environmental management systems appropriate to the size and nature of operations, enabling risk identification, performance monitoring, and continuous improvement to mitigate environmental impacts, including GHG-emissions, waste, resource consumtion and packaging. Data shall be documented at both operational and corporate levels and disclosed to Hi3G upon request.



We encourage Business Partners to:

- Adopt environmentally responsible technologies and practices throughout operations and the supply chain to reduce energy consumption and mitigate climate impact.
- Utilize renewable energy sources whenever possible.
- Support the transition to a circular economy, enhancing resource efficiency by promoting recycling, reuse of materials and products, and waste reduction wherever feasible.
- Commit to ambitious greenhouse gas reduction targets in line with the Paris Agreement and the 1.5°C goal, by adopting science-based climate objectives aligned with and validated by the Science Based Targets initiative (SBTi).

Economics, international sanctions and product safety

We require Business Partners to:

- Comply with relevant economic regulations, including but not limited to laws related to taxation, customs duties, trade regulations, sanctions-regulations, anti-money laundering, and financial reporting requirements.
- Comply with all applicable product safety regulations and standards in the jurisdictions where products are designed, manufactured, distributed, and sold. This includes, but is not limited to, compliance with laws relating to product testing, labelling, packaging, and consumer protection. The Business Partner shall ensure that all products meet the relevant safety requirements and do not pose any unreasonable risk to consumers or users.
- Maintain accurate and truthful reports for all transactions, especially related to assignments carried out to or on behalf of Hi3G.
- Implement robust procedures and control mechanisms to verify transactions and detect any incorrect or unauthorized activities.
- Pay all applicable duties, fees, and taxes, including stamp duty, value-added tax, income taxes, and employer contributions.
- Submit accurate tax declarations.
- For Swedish entities, ensure possession of a valid F-tax certificate (also applicable on suppliers and subcontractors).
- Keep detailed records of financial transactions and tax-related activities.
- Ensure transparency in the reporting and payment of taxes and duties.
- Conduct regular internal audits or reviews to ensure compliance with documentation, reporting, and tax obligations.



We encourage Business Partners to:

- Continuously improve procedures and control mechanisms to enhance accuracy and reliability in financial reporting.
- Encourage proactive measures to detect and address any potential errors or unauthorized transactions promptly.
- Foster a culture of compliance by staying updated with changes in tax laws and regulations to ensure compliance from time to time.
- Promote open communication channels for reporting discrepancies and addressing any issues related to financial transactions and tax matters.
- Conduct regular screening of all suppliers against relevant sanctions lists.

