

INTRODUCTION

Tele Radio believes that it is important to behave in a socially and ethically correct manner. It is our belief that we must do everything in our power to ensure that people whose work contributes to our success are not deprived of their basic human rights, nor forced to suffer physically or mentally from their work in any way.

To make our position clear we have established a Code of Conduct. We require all of our employees, suppliers and their subcontractors to comply with this code.

Our Code of Conduct is based on The UN Global Compact's Ten Principles.

1. OBLIGATION TO INFORM AND SIGN

All our employees shall confirm by signing this document that they are aware of and will comply with our Code of Conduct and future revisions.

The Code of Conduct is an open document and shall be displayed to our customers on our web site as well as in all our facilities in such a way that everyone working with us or contributing to our products and services will be aware of and will comply with our Code of Conduct.

The code shall also be communicated to all our suppliers as well as for subsequent communication to their subcontractors and we shall make our best efforts to implement our Code of Conduct as a mandatory obligation in all our supply chain agreements.

We are prepared to clarify the content and associated requirements of this document upon request.

2. LEGAL REQUIREMENTS

We will, in all activities, adhere to the national and regional statutory requirements in the countries in which we operate.

Should any of the requirements stated in this code be in violation of the law in any country or territory, the local law shall always take precedence. It is, however, important to understand that our requirements are not limited to the requirements of national laws.

2. GENERAL COMMITMENT TO ETHICS AND HUMAN RIGHTS

We shall all set a prime example of commitment to ethics. In any business practice, honesty and integrity must be top priority for all, and any involvement in bribery, extortion or corruption and/or conducts disturbing the free-market shall not be tolerated in any form.

We support and respect the protection of internationally proclaimed human rights.

Our executives must have an open-door policy and welcome suggestions and concerns from employees. This will allow employees to feel comfortable discussing any issues and will alert executives to concerns within the work force.

Any conflict of interests must be disclosed.

We will treat everyone fairly, have mutual respect, promote a team environment and avoid the intent and appearance of unethical or compromising practices.

Employees should pose the following questions to themselves when any behaviour is questionable:

- Is the behaviour legal?
- Does the behaviour comply with all our applicable policies?
- Does the behaviour reflect our values and culture?
- Could the behaviour adversely affect company stakeholders?
- Would you feel personally concerned if the behaviour appeared in a news headline?

We promote a trustworthy and honest atmosphere to reinforce the vision of ethics within the company.

Any unauthorized use of confidential company information and trade secrets including marketing and customer information, operational, personnel and financial information, any source code and/or technical information as well as any intellectual property and know-how, is strictly forbidden.

Employees shall not use corporate assets or business relationships for personal use or gain.

3. CHILD LABOUR

We base our child labour policy on, and honour, the UN Convention on the Rights of the Child.

We acknowledge that it exists and realize that it cannot be eradicated by simply setting up rules or inspections, but we recognize, even if local law permits child labour, the rights of every child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with a child's education, or that is harmful to a child's health or physical, mental, spiritual, moral or social development.

We do not accept child labour in our own supply chain. We will discontinue cooperation with any party that does not comply with our policy on child labour.

4. WORKERS' RIGHTS

4.1 Basic human rights

Anyone who works directly or indirectly for us is entitled to basic human rights:

4.1.1 We do not accept the use of bonded workers, forced labour, prisoners or illegal workers.

4.1.2 If foreign workers are employed on a temporary employment contract basis, they should never be required to work for any period of time against their own will.

4.1.3 We do not accept that workers are subject to corporal punishment or other forms of mental or physical disciplinary actions, or sexual harassment.

4.1.4 We recommend that all workers are free to lawfully join associations of their own choosing, and have the right to collective bargaining. We do not accept any disciplinary actions from employers towards workers who choose to organize or join an association.

4.1.5 No worker should be discriminated against because of race, colour, ethnic background, national origin, gender, religion, disability, sexual orientation, age or political opinion.

4.1.6 We recommend that all workers with the same experience and qualifications receive equal pay for equal work.

4.1.7 All workers are entitled to an employment contract.

4.2 Wages and working hours

4.2.1 Wages should be paid regularly, on time and be fair in respect of work performance. Legislated minimum wages should be a minimum, rather than a recommended level.

4.2.2 Weekly working time must not exceed the legal limit, and all overtime work should be voluntary and properly compensated.

4.2.3 Workers should be granted stipulated annual leave; sick leave and maternity/paternity leave without any form of repercussion.

4.2.4 Dismissal of female workers due to pregnancy is not acceptable.

5. SAFE WORKPLACE

5.1 Building and fire safety

We require that worker safety is always a priority concern. Buildings must have clearly marked exits, and preferably emergency exits on all floors. All workers should be informed of the safety arrangements in the building, such as emergency exits, fire extinguishers, first aid equipment, etc. An evacuation plan should be displayed on every floor of a building and the fire alarm should be tested regularly. Regular evacuation drills are recommended.

5.2 First Aid

We recommend that first aid equipment is available in all buildings that are used, and at least one person in each department should be trained in basic first aid.

5.3 Workplace environment

We and our suppliers shall maintain a safe, clean, healthy and productive environment and conditions including clean restrooms.

6. ENVIRONMENTAL ISSUES

The environment is of increasing concern globally and we expect all our suppliers to act responsibly in this respect.

Ola Samelius

We believe in protecting the environment and do this by encouraging the reduction, reuse and recycling of waste material or refuse. We furthermore encourage the reduction of excess packaging and the use of recycled and non-toxic materials whenever possible. Emissions shall be reduced so as to cause minimum harm to the environment.

We and our suppliers must also comply with all applicable environmental laws and regulations.

7. MONITORING AND ENFORCEMENT

7.1 The principle of trust and cooperation

We expect all our employees, suppliers and their subcontractors to respect this Code of Conduct and to actively do their utmost to achieve its standards. We are prepared to cooperate with our suppliers to achieve adequate solutions in individual cases. We are also prepared to take cultural differences and other relevant factors into consideration, but we will not compromise on the fundamental requirements described in this document.

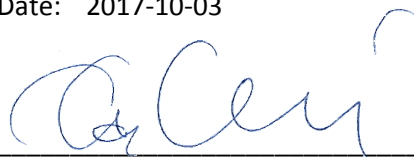
7.2 Monitoring

We reserve the right to make unannounced visits to sites where people work directly or indirectly for us. We also reserve the right to let an independent party (e.g. a Non-Governmental Organization) make inspections to ensure compliance with our Code of Conduct.

I, the undersigned, hereby confirms that I have read, understood and will comply with this Code of Conduct and future revisions.

Place: Askim, Sweden

Date: 2017-10-03



Name: Ola Samelius, Managing Director

Company: Tele Radio International Holding AB