



CODE OF CONDUCT
CLX Communications
Version 1.1

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1 Code of Conduct

The CLX Communications Code of Conduct applies to CLX Communications AB and all its subsidiaries, referred to as the “Company”.

The Company and its staff must, at all time, comply with all applicable laws and regulations, as well as internal policies.

The Company shall adhere to UN Global Compacts 10 Principles.

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

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

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

2 General Conditions

All staff members shall follow these rules when conducting business and in relationship with colleagues, customers, suppliers and other contacts.

2.1 Application of Rules

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

2.2 National Law

The Company shall comply with applicable local laws. Where the provisions of applicable local laws and Code of Conduct address the same subject, and are not in conflict, the highest standard shall be applied as long as not in conflict with applicable local laws.

2.3 Responsibility for this Code of Conduct

The Company Management Team headed by the CEO, is ultimately responsible for this Code of Conduct.

Executive management are responsible for ensuring that the Code of Conduct is enacted through integration into the company normal management systems; each department head is responsible for implementing and communicating this policy within their 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 the company high standard of ethics.

3 Procurement

Key suppliers, subcontractors and other parties that have a direct contractual relationship with The Company should adhere to relevant parts of “CLX Communications Supplier Code of Conduct” or adhere to the “Electronic Industry Citizenship Coalition (EICC) Code of Conduct”.

“CLX Communications Supplier Code of Conduct” is used in The Company procurement assessment when selecting suppliers and subcontractors, no matter what type of product or service we are purchasing (it might be anything from call centers, data centers, to IT equipment, consultancy services or other things).

4 Labour Standards and Human Rights

4.1 Human Rights

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

4.2 Labor Unions

As far as any relevant laws allow, all employees or staff 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 Labour

The Company shall ensure that all staff shall be free to leave his/her employment or contract after giving reasonable notice.

The Company shall ensure that no staff 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 The Company and its employees or staff shall be free from threats.

4.4 Child Labour

The Company shall follow United Nations Convention on rights of the Child.

The Company shall not have any employee or hired staff 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.

The Company 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

The Company shall ensure that its staff members 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.

The Company 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

The Company shall ensure that its staff members have written agreements and that they understand their employment conditions. The Company 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. The Company's working hours shall comply with national laws and must not be excessive.

5 Health and Safety

The Company shall be committed to providing a safe working environment for its employees and staff in accordance with internationally recognised standards.

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

The Company shall inform its employees and staff 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 the task of preserving a sound environment.

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

The Company shall provide adequate and regular training to ensure that staff are adequately educated on health and safety issues.

The Company shall secure that, where it provides accommodation, it shall be clean, safe and meet the basic needs of the staff.

6 Intellectual Property

The Company shall ensure that intellectual property rights (IPR) are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

The Company shall have a process in place to make sure that no intellectual property rights (IPR) are infringed.

The Company shall ensure that its employees and staff understands the importance of protecting The Company's and others IPRs.



The Company shall make sure that any employee or staff who suspects the IPR infringement should contact his/her supervisor.

If case of IPR infringement, appropriate action shall be taken by The Company to correct immediately.

6.1 Copyright Materials

The Company shall provide employees and staff with legally purchased copyright material determined to be necessary for staff members to perform their job responsibilities. The Company shall ensure that its employees and staff follows legal guidelines regarding the use of copyright material.

The Company shall ensure that its employees and staff learns about the copyright status of any material copied for distribution either internally or externally.

The Company shall make sure that any employee or staff 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 The Company to correct immediately.

6.2 Confidentiality

The Company staff must keep the company's and its staff's business and all company relationships as confidential, provided that there is no documented agreement that lifts this confidentiality clause in some aspect or another. This also applies for all completed assignments and agreements.

6.3 Disclosure of Information

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.

7 Privacy policy

This Policy applies only to transfer of information whereby it is possible to identify a person (personal data) and which The Company receives in any format through its applications.

7.1 Information & Use of personal data

The Company will maintain only the data the processing of which clients have expressly requested from The Company.

Should The Company decide to change the policy, The Company will post the changes in advance on The Company's home page www.clxcommunications.com, in order for our clients, to be aware which personal data The Company is processing, how The Company is using them and under which circumstances The Company discloses them (if that is the case).

7.2 Data integrity

The Company shall use personal data only in ways which are in line with the purpose they were gathered for or which our clients approved or in line with the valid laws or regulations.

7.2.1 Limitation

The Company delivers systems to customers such as Mobile Operators. The Company will not be liable for how The Company's customers in their turn handle personal data

7.2.2 Legal disclaimer of liability

The Company can disclose personal data when so required by the law or regulation, or when it is assured of the good intentions that such a procedure is necessary so as to observe the legal regulations, respect legal obligations or protect the rights, property or personal security of The Company, its users and the public.

7.2.3 Privacy policy for Children

The Company undertakes to protect the needs of children's privacy and encourage parents and guardians to play an active role in their children's online activities and interests.

The Company does not knowingly collect information from children below 15 years of age and The Company so not knowingly direct its web site or its services to children below 15 years of age.

7.2.4 Cookies and links to other sites

The Company may use cookies to improve customers' experience while using The Company software.

Most web browsers accept cookies automatically, however the end user may be given a chance to accept or reject cookies. Usually it is possible to setup of the web browser to reject cookies. However, in some cases if the user refuses to accept a cookie, this can interfere with the work and negatively affect the use of The Company software.

The Company software may include links to other sites. The Company shall not be liable for the privacy policy or contents of such other sites.

7.3 Security

The Company shall ensure security and privacy of any personal data it processes. The Company shall use adequate physical, electronic and administrative procedures in order to prevent disclosure, unauthorised access, to maintaining data correctness.

In the unlikely event of unauthorised disclosure, The Company shall undertake commercially reasonable steps so as to limit and correct the data disclosure.

7.4 Corrections of records

The Company is keeping records of its customers, business partners, 3rd party suppliers and staff members. The data that is kept is typically name, address, contact number, email, and financial information needed to pay salaries and taxes, keeping track of accounts receivables, and supplier ledger etc.

The Company does not gather personal data other than such data that is strictly needed to operate the business.

If a person – who has personal data in our registers - wants access to, correction, amendment or deletion of these personal data, he/she should contact The Company.

7.5 Contact

The Company shall be accessible to each staff member, consultant, customer, business partner and all other persons who may have questions in relation to this policy or data security practices. The Company can be contacted via e-mail address: info@clxcommunications.com

8 Environment & Sustainability

The Company shall ensure that finite resources are used responsibly and carefully. The Company shall strive to minimize it's environmental impact.

The Company shall maintain operational practices that reduce any environmental burden associated with our activities are promoted.

The Company shall continuously improve and seek innovative environmental friendly solutions in products and services.

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

8.1 Energy consumption

The Company shall actively looking for more power efficient solutions in hardware (HW) installations, for instance it could be to choose virtual servers, cloud solutions or selecting HW with low energy consumption whenever possible.

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

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



8.2 Waste reduction and recycling

The Company 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.

9 Fair Business Practices

9.1 Professionalism and Conduct

The Company staff members must in all respects act professionally in their dealings with any business contact.

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

The Company must refrain from creating unrealistic expectations from our business partners.

9.2 Anti-Corruption

No form of extortion and bribery, including improper offers for payments to or from staff members, or organizations, or public officials, is tolerated. This applies regardless of whether the undue advantage is offered directly or through an intermediary.

9.3 Financial Interests

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

9.4 Gifts and Hospitality

The Company shall not, directly or indirectly, offer gifts to The Company employees or 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 if there is a business purpose involved, and the cost is kept within reasonable limits.

Hospitality, expenses or gifts shall not be offered or received in situations of contract negotiation, bidding or award.

9.5 Money Laundering

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



9.6 Competition

The Company shall not breach relevant competition laws. The Company shall not be part of any breach of general or specific competition regulations.



Revision History

Version	Date	Author	Description
V1.0	2015-09-21	LO	First version
V1.1	2015-09-24	LO	Revision