**Contractor Code of Business Conduct**

BTS believes that it is important to work with contractors who conduct   
business in a responsible way with respect for our clients, BTS, the environment   
and the societies in which they operate.

**Our Code establishes a basic standard of conduct**

BTS as a fundamentally people-driven enterprise is defined by its people. Personal behavior towards customers and other stakeholders and among themselves must therefore be characterized by a high standard of business ethics, compliance with laws and regulations and adherence to good business practice in a setting of honesty, integrity and respect for human rights.

This means that at BTS, we believe in treating people as equals, respecting each other and the differences between us. We are committed to a work environment in which employees, clients, contractors, and any others who experience harassment, bullying, or other inappropriate conduct feel safe and encouraged to ask for help without fear that it might negatively impact their employment, engagement, or other business relationship. We expect any contractor to live up to these core beliefs.

Every contractor has a personal responsibility to uphold a Code of Business Conduct and to refrain from unacceptable conduct as outlined in this Code. Contractors are also responsible for complying with other relevant local rules or customs.

**Purpose of the Contractor Code of Business Conduct**

The Contractor Code of Business Conduct is an important part of, and establishes the basis of, BTS’s strategy for a sustainable delivery chain and the ambition to establish a proactive collaboration with our contractors in the promotion of lawful, professional and fair practices that integrate the respect for labor practices, human rights, the environment and business ethics.

**The parties’ commitments**

BTS uses the UN Global Compact's principles in the areas of human rights, labor, the environment and anti-corruption as guiding principles. In this context additional normative standards are found in:

* The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
* The Rio Declaration on Environment and Development
* The United Nations Convention Against Corruption

BTS expects its contractors to operate in accordance with international norms, follow regional and national laws and regulations as well as manage material sustainability issues in a systematic manner within the field of human rights, labor practices, business ethics and the environment.

**Equal Opportunities and Diversity**

1. Everyone has the right to be treated with dignity and respect. All contractors shall employ fair and inclusive practices in their own organizations.
2. BTS does not tolerate discrimination, bullying, harassment or retaliation on any ground. This relates to, among other areas, age, sex, race, color, sexual orientation, disability, pregnancy, religion, citizenship status, military status, gender identity or expression, genetic information, nationality, education or professional background or any other legally protected characteristic or status. Discrimination, bullying, harassment and retaliation can take many forms and interpretation of what constitutes such behavior can differ by both people and situation. As such, it can be difficult to establish an unequivocal truth in questioned behavior. As guidance, the appendix contains a general discussion of these matters with examples.

**Personal Conduct**  
Each contractor has a personal responsibility to uphold and exemplify this Code in all day-to-day activities.

1. Each contractor is expected to
   1. behave respectfully and honestly in dealing with BTS customers, employees and other stakeholders,
   2. safeguard any company assets they are entrusted with,
   3. comply with the general terms of their engagement (including any client-specific terms) and related professional standards,
   4. comply with applicable anti-corruption laws and regulations,
   5. not bribe, extort, or do any other forms of corruption,
   6. respect the right to information and privacy of end users, clients, and business partners.

**Compliance**

As a condition for doing business with BTS, any supplier must ensure that its operations are in line with the general standards in this code.

BTS reserves the right to randomly review all contractors’ policies, procedures or any other documents related to this code of business conduct.

**How to report something**

If an issue arises, you must report it to your own employer in accordance with your Company’s policies and procedures.

In addition to reporting the issue to your Company, you may also reach out to a BTS regional human resources team or a BTS manager or leader that you feel comfortable speaking with to report any issue relating in any way to an engagement with or at BTS. Affected individuals may report to another member of BTS management to ensure that the issue is reported.

**How we will respond to your concern**

When we become aware of a concern, BTS will respond in an appropriate manner, prioritizing safety, respect, and comfort. Often, this will warrant an investigation, which BTS will conduct in accordance with its legal obligations and in a manner respectful to the reporting person, the subject to the investigation, and possible witnesses. BTS aims to be prompt and thorough with the investigation.

**Please note**

BTS recognizes that certain national, regional, provincial, and/or local laws may differ with respect to legal concepts dealing with unlawful conduct. Conduct may be prohibited under this Code with its attachment even if applicable laws would not prohibit it. Nothing in this policy is intended to contradict mandatory local law or to limit any individual’s rights under those laws.

**Consequences of Non-Compliance**

BTS will base its supplier relations on dialogue and collaboration to fulfill BTS’s Contractor Code of Business Conduct. However, if the supplier fails to meet the requirements of this Contractor Code of Business Conduct, and/or an audit reveals less than full compliance, violations may constitute breaches of contract and will be dealt with accordingly.

By signing the document I ensure that my way of working as a contractor is in line with BTS code of business conduct, and I agree to the conditions and requirements outlined in this document in my services for BTS and BTS’s clients.

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Mailing Address Date

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Contractor

**Appendix: Example of discrimination, bullying, sexual harassment, other harassment, retaliation.**

**What is meant by discrimination?**

Discrimination is the practice of treating one person or a group of people less fairly or less well than others on the basis of a group, class or category to which the person is perceived to belong. These include, but are not limited to, [age](https://en.wikipedia.org/wiki/Ageism), [disability](https://en.wikipedia.org/wiki/Ableism), [ethnicity](https://en.wikipedia.org/wiki/Racism), [family status](https://en.wikipedia.org/wiki/Family), [gender identity](https://en.wikipedia.org/wiki/Discrimination_against_non-binary_gender_people), [genetic characteristics](https://en.wikipedia.org/wiki/Genetics), [marital status](https://en.wikipedia.org/wiki/Marital), [nationality](https://en.wikipedia.org/wiki/Nationalism), [religion](https://en.wikipedia.org/wiki/Religious_discrimination), and [sexual orientation](https://en.wikipedia.org/wiki/Sexual_orientation_discrimination).

**What is meant by bullying?**

Conduct undermining a person’s dignity can reasonably be interpreted as conduct causing humiliation, fear, embarrassment or offense to that person, denigrating the person’s character or otherwise adversely affecting the person’s health or safety.

The following examples referring to or aimed at a person illustrate types of conduct that may suggest bullying. Other types of conduct not listed may also constitute bullying.

* Unwelcome or hostile comments, gesturing, jokes, kidding or teasing based on a person’s physical or other characteristics/appearance or that otherwise may cause offense.
* Isolation and shunning, gossip, rumors, insults, name-calling including external media such as Facebook, Twitter, blogging, etc.
* Circulating private images, videos, or messages.
* Slamming doors, throwing objects and/or making intimidating physical gestures or unsolicited physical or other contact.

**What is meant by sexual harassment?**

The following examples referring to or aimed at a person illustrate types of conduct that may suggest sexual harassment. Other types of conduct not listed may also constitute sexual harassment.

Sexual harassment means unwanted or unwelcome conduct of a sexual nature.

* It can mean engaging in conduct that contributes to a hostile environment based on an individual’s sex, sexual orientation, sexual characteristics, gender identity, or gender expression, where conduct is known or ought reasonably to be known to be unwelcome.
* It can also mean making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought to know that the solicitation or advance is unwelcome.

Sexual harassment includes conduct by a person of any gender against a person of any gender. It goes beyond explicit requests for sexual favors, unwanted physical contact, or other attention of a sexual nature.

Examples of sexual harassment may include, but are not limited to the following:

* Unconsented-to or unwelcome touching or physical contact of a sexual or romantic nature such as grabbing, pinching, groping, massaging, hugging, pressing, brushing up against.
* Unwelcome sexual or romantic advances, including over text message, email, or other media.
* Comments about someone’s body, weight, clothing, sexual experiences; Leering, whistling, commenting, or making nonverbal gestures related to an individual’s physical appearance.
* Requests for sexual favors, whether or not sincere.
* Sexual jokes, games, innuendo, or other remarks that are told to or heard by any person who may find such jokes or remarks derogatory, degrading, or offensive.
* Questions or comments about an individual’s sex life, desires, or preferences.
* Showing or displaying material (cartoons, articles, pictures, videos, etc.) with sexual content that others may find offensive, whether in public areas or private areas.

**What is meant by other harassment?**

Harassment is not limited to sexual harassment. It also includes conduct that creates or contributes to a hostile environment based on the discrimination categories above or any category under applicable law.

**What is meant by retaliation?**

Retaliation is engaging in some adverse action against an individual because they engaged, in good faith, in some legally-protected activity, such as making a complaint of harassment or discrimination or assisting in an investigation.