

Truecaller Code of Conduct



truecaller



Index.¹

Letter from the CEO	3
1 Introduction	4
1.1 Application	5
1.2 Compliance with laws and regulations	5
1.3 Monitoring	5
2 Human rights	6
3 Elimination of discrimination	7
3.1 Respect and dignity	7
3.2 Freedom of association	7
3.3 Prohibition of forced labour	7
3.4 Prohibition of child labour	8
3.5 Fair employment conditions	8
3.6 Fair, safe and healthy working conditions	8
3.7 Responsible sourcing of raw materials	9
4 Anti-corruption and business integrity	10
5 Environment	11
6 Business principles	12
6.1 Conflicts of interest and competition	12
6.2 Communication and financial information	12
6.3 Protection and proper use of company assets	13
6.3.1 <i>Intellectual property</i>	13
6.3.2 <i>Information technology resources</i>	13
6.4 Protecting information	14
6.5 Preventing insider trading	14
6.6 Personal data and privacy	15
6.7 Use of information technology	15
7 Anti-money laundering	16
8 Reporting compliance concerns	17
9 Consequences in case of violations	18

¹ Approved by the Board of Directors on May 10, 2023.

Letter from the CEO



We know that winning is not just about results, but how you get those results. Ethics and compliance is a fundamental part of a performance culture in a successful company. Ethical leadership is about each individual's decisions and actions with others. Just as we have a responsibility to our customers, we have a responsibility to ourselves to uphold the value of uncompromising integrity.

The Code of Conduct is our foundation of ethical leadership and encompasses the basic principles that govern our ethical and legal obligations to Truecaller. These standards provide clarity and guidance on how Truecaller expects all employees to operate on a daily basis, both internally and externally. Adhering to these standards strengthens our reputation with our customers and shareholders for honesty and fair dealing and protects our bottom line.

Each of us has a personal responsibility to understand these policies and practice them in our daily business lives. Unethical or illegal business conduct on the part of Truecaller is simply unacceptable and will not be tolerated.

I appreciate the commitment and continued efforts of the Truecaller community to strengthen and protect both our company and our reputation.

Alan Mamedi
Chief Executive Officer

1. Introduction

This Code of Conduct has the purpose of ensuring the promotion of fair employment conditions, safe working conditions, responsible management of environmental issues, protection of human rights and high ethical standards.

This Code of Conduct sets out the fundamental principles of law and ethics governing the way that Truecaller does business. These standards are not the exclusive source of guidance and information on Truecaller's expectations, but they serve as the basis for other Truecaller policies, instructions and guidelines. Every member of Truecaller community – directors, executives, managers, employees and business partners has a duty to comply with applicable laws and adhere to the highest standards of business ethics.

In order to ensure high standards, True Software Scandinavia AB, Truecaller International LLP and every other company in the group of companies (hereinafter jointly referred to as **"Truecaller"**, **"we"**, **"our"**) shall respect all internationally recognized human rights demanded by national laws and regulation, including in relation to freedom of association and collective bargaining, forced labour, child labour, and non-discrimination.

We shall avoid causing, contributing to and being linked to adverse human rights impacts, and adequately address such impacts when they occur. We shall, in all contexts, seek ways to honour the principles of internationally recognized human rights.

Breaching this Code of Conduct could have serious implications for Truecaller and for individuals involved. Where illegal conduct is found, the consequences could include significant fines for Truecaller, imprisonment for individuals and significant damage to our brand name and therefore financial damage.

As a company that deals with significant amounts of information and with over 350 million monthly active users worldwide, respecting the privacy of individuals is essential to how Truecaller operates its business. Truecaller sets out to work together with its Business Partners² to ensure that their activities are aligned with our Code of Conduct.

² References in this Code of Conduct to "Business Partners" include: 1) consultants, 2) agents, 3) distributors, 4) suppliers, and 5) other business partners.



1.1 Application

This Code of Conduct shall be applied throughout our operations globally, including in the management, development, supply, sales and support of our solutions and services.

All Truecaller units, companies, executives, board members, and Employees³ shall comply with this Code of Conduct. Truecaller also requires that all its Business Partners comply with equivalent standards as set out in this Code of Conduct and that they have appropriate systems in place to ensure continuous compliance and to demonstrate such compliance. Any breach of this Code of Conduct will allow Truecaller to terminate its relationship with the Business Partners with immediate effect.

This Code of Conduct cannot provide a solution for every situation, particularly as laws differ between countries. If specific eventualities are not expressly covered, the spirit of this Code of Conduct, and other group policies, must be upheld by exercising common sense and good judgement, always in compliance with applicable laws.

1.2 Compliance with laws and regulations

All Truecaller units, companies, executives, board members, Employees and Business Partners shall comply with relevant laws and regulations in the countries where we operate.

1.3 Monitoring

Compliance with this Code of Conduct is essential to Truecaller. The Board of Directors is responsible for ensuring this Code of Conduct and the standards therein are applied throughout Truecaller's operations.

Assurance of compliance within Truecaller is monitored by senior management on an annual basis. Senior management shall see to, and Employees must ensure, that all Employees know and understand the requirements of this Code of Conduct.

Any breaches of the Code of Conduct must be reported. The Board of True Software Scandinavia AB and Truecaller International LLP will not criticise senior management for any loss of business that is a result from observance of this Code of Conduct, and other group policies.

³References in this Code of Conduct to "Employees" include: 1) employees, whether full-time, part-time, fixed-term, permanent or trainees, 2) contractors, temporary staff, secondees, work-experience placements, 3) persons with statutory director roles or equivalent responsibilities, 4) employees of joint-ventures and approved third-party labour providers where Truecaller has direct management control, and 5) employees of new acquisitions, wherever located.

2. Human rights



Truecaller and its Business Partners shall respect all internationally recognized human rights, including the International Bill of Human Rights.

We shall avoid causing, contributing to and being linked to adverse human rights impacts, and adequately address such impacts when they occur.

We recognize that businesses such as ours have the responsibility to respect human rights, as well as the ability to contribute to positive human rights impacts.

3. Elimination of discrimination

3.1 Respect and Dignity

All Employees shall be treated with respect and dignity, and all forms of discrimination are prohibited. This includes, but is not limited to, discrimination based on race, colour, gender, sexual orientation, gender identity, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic background, social origin, social status, indigenous status, disability, age, union membership or Employee representation and any other characteristic protected by local law, as applicable.

Truecaller respects all internationally recognized human rights, including the principles concerning fundamental rights set out in the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, and the eight ILO core conventions.⁴

3.2 Freedom of association

All Employees shall be free to form and to join, or not to join, trade unions or similar external representative organizations and to bargain collectively. Information and consultation with Employees can be done through formal arrangements or, if such do not exist, other mechanisms may be used.

3.3 Prohibition of forced labour

Modern day slavery, including forced, bonded or compulsory labour and human trafficking are strictly prohibited. Employees shall be free to leave their employment after reasonable notice as required by applicable law or contract. Employees shall not be required to lodge deposits of money or identity papers with their employer.

⁴ The eight core conventions are: Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87), Right to Organise and Collective Bargaining Convention, 1949 (No. 98), Forced Labour Convention, 1930 (No. 29), Abolition of Forced Labour Convention, 1957 (No. 105), Minimum Age Convention, 1973 (No. 138), Worst Forms of Child Labour Convention, 1999 (No. 182), Equal Remuneration Convention, 1951 (No. 100), and Discrimination (Employment and Occupation) Convention, 1958 (No. 111)



3.4 Prohibition of child labour

No person shall be employed who is below the minimum legal age for employment. Minimum age is the age of completion of compulsory schooling, or not less than 18 years. A child means a person below the age of 18 years. Personal development includes a child's health or physical, mental, spiritual, moral, or social development.

3.5 Fair employment conditions

Employees shall understand their employment conditions. All Employees will be provided with a written document that outlines the basic terms and conditions of employment in a language understandable to them.

Pay and terms shall be fair and reasonable and comply at a minimum with applicable laws or industry standards, whichever is higher.

Working hours shall comply with applicable laws. Deduction from wages as a disciplinary measure shall not be permitted. Corporal punishment, physical or verbal abuse, bullying or other unlawful harassment and any threats or other forms of intimidation shall be prohibited.

3.6 Fair, safe and healthy working conditions

Truecaller complies with all applicable legislation and regulation concerning fair, safe and healthy working conditions, and aims to continuously improve health and safety performance.

The health and safety of our Employees shall be prioritised. A healthy and safe working environment, including psychosocial considerations, shall be provided for Employees, in accordance with international standards and national laws. The health and safety of workers shall never be compromised because of cost efficiency or expediency concerns.

Detected unsafe or unhealthy practices shall be reported to the immediate manager so that they can be adequately addressed.

Appropriate health and safety information and training shall be provided to Employees, including, but not limited to, risks they are exposed to and arrangements for safe evacuations of buildings.

All Employees shall be provided with necessary and relevant personal protective equipment, when applicable. Truecaller shall also provide support to Employees to maintain a balance between work and personal life.

3.7 Responsible sourcing of raw materials

Due diligence shall be exercised with respect to the sourcing and extraction of raw materials in hardware purchased by Truecaller.

4. Anti-corruption and business integrity



Truecaller upholds the highest standards of integrity in business interactions and has a zero-tolerance policy towards any form of corruption and financial irregularity.

For example bribery, kickbacks, facilitation payments, fraud, embezzlement, and money laundering to ensure that no Employee acts in any way that is inconsistent with Truecaller's objectives or with the integrity of the business.

5. Environment

We shall develop, produce, and offer services that contribute to the sustainable development of society and continuously improve, with a life cycle perspective, the environmental performance of our business activities.

We shall work to continuously reduce the negative impact of our own operations and take a precautionary approach to environmental challenges.

We are committed to making continuous improvements in the management of our environmental impact and to the longer-term goal of developing a sustainable business. In this respect, we shall use appropriate methodologies to determine significant issues and aspects, for setting and reviewing objectives and targets securing that statements and communication regarding the sustainability performance of our operations and services are fact based.

We shall endeavour to avoid or reduce any waste or emissions that are caused as a result of our business activities. We will use efficient technologies which aim to reduce the environmental impact as much as possible. Truecaller adopts a precautionary approach and will -where applicable- respect the polluter pays principles.



6. Business principles

6.1 Conflicts of interest and competition

All Employees, Business Partners and others working for Truecaller are expected to always act in the best interest of Truecaller, and to avoid personal activities and financial interests which could conflict with their responsibilities to Truecaller. Employees must not seek gain for themselves or others through the misuse of their positions.

Truecaller and its Business Partners shall respect and comply with all applicable competition laws and regulations and not enter into discussions or agreements with competitors concerning pricing, market sharing or other anti-competitive arrangements.

6.2 Communication and financial information

Truecaller shall ensure that its Employees have a good understanding of their units' operational and financial performance to increase involvement in improving operations. Comments about financial performance and prospects to external parties shall however only be made by official company spokespersons. Employees shall -in other cases- not make any comments on behalf of Truecaller, unless expressly authorised by the senior management.

Everyone involved in financial reporting shall always provide full, fair, accurate, timely, and understandable disclosures in reports and documents that Truecaller files with or submits to government agencies or authorities or makes in other public communications.



6.3 Protection and proper use of company assets

Truecaller has a wide variety of assets, including physical assets, proprietary information and intellectual property. Employees are responsible for protecting Truecaller property that has been entrusted to them, and for helping to protect our assets in general.

All Employees must be aware of and understand Truecaller's information security policies and report any loss, or risk of loss, of Truecaller property to the immediate manager, or other responsible manager, as soon as it comes to their attention.

6.3.1 Intellectual property

Intellectual property includes a variety of properties, such as computer programs, technical documentation and inventions. Intellectual property is an asset of utmost value to Truecaller and must be treated with appropriate care. Employees must follow and, in case of doubt, seek instructions on how Employees shall act to protect this valuable asset.

6.3.2 Information technology resources

Truecaller's information technology (IT) resources, including communication systems and connections to the Internet, shall be used for conducting Truecaller business or for other incidental purposes, authorised by management or applicable steering documents.

Unacceptable use of Truecaller's IT resources includes: processing, sending, retrieving, accessing, displaying, storing, printing or otherwise disseminating material and information that is fraudulent, harassing, threatening, illegal, racially or sexually oriented, obscene, intimidating, defamatory or otherwise inconsistent with a professional environment.

6.4 Protecting information

Information is a valuable business asset to Truecaller. As such, Employees shall protect Truecaller's confidential and proprietary information and that of our users, customers, partners and suppliers. In order to protect this information Employees are not allowed to access, make queries or search for data in Truecaller's database unless the Employee is explicitly authorised to do so.

Persons working for Truecaller have access to information owned by Truecaller and sometimes also to information owned by third parties. Such information may be financial information, business plans, technical information, information about Employees and customers, and other types of information. Non-authorized access, use and disclosure of such information may damage Truecaller or the third party and, therefore, Employees are not allowed to access, use or disclose the information unless properly authorised to do so. Employees are not allowed to seek, access, use or disclose confidential information from competitors as well.

Non-authorized access, use and disclosure may also be a violation of laws, including privacy regulations. Whenever an Employee is in doubt of his/her authorization, the Employee must seek instructions from an immediate manager, or other relevant function within the company.

6.5 Preventing insider trading

Employees are prohibited from using inside information received from Truecaller or from any of Truecaller's Business Partners, for the purpose to buy or sell securities of Truecaller or of Truecaller's Business Partners. Securities include shares, equities, warrants and related derivatives or spread bets.

Trading or encouraging others to trade on inside information, or giving it to unauthorised parties, is considered a criminal offence in most countries. A violation of the applicable laws can lead to fines and/or prison sentences.

Inside information is understood as information that is not publicly available and that a reasonable investor is likely to consider important in deciding whether to buy or sell a company's shares.

6.6 Personal data and privacy

We are subject to many different data protection regulations in the countries where we do business and closely track the data privacy landscape in these countries to make sure that we proactively adopt good practices and stand ready to comply with them. We also allocate significant resources to take the necessary steps to become compliant.

Further, privacy is integral to the system and all components of Truecaller and Truecaller seeks to deliver the maximum degree of privacy by ensuring that personal data are automatically protected in any given IT system or business practice and that no action is required on the part of the individual to protect their privacy.

In this respect, our Employees access user data only if they have been explicitly granted access rights as part of their job and only if it is needed to perform their job function. This access is tightly controlled and only allowed in a manner that respects users' privacy. Violations of this rule will be taken extremely seriously. We also ensure that this is also the case for Truecaller's Business Partners with whom Truecaller associates with.

6.7 Use of information technology

Our Employees must ensure the responsible and secure use of IT, applying the same personal and professional standards as for any other business activity when using the internet, intranet, social media, messaging and email.

7. Anti-money laundering



Money laundering occurs when funds or other assets originating directly or indirectly from criminal offenses are put into circulation in the legal economy, making their source appear legal.

Liability for money laundering does not require the person involved to be aware that money is being laundered through the legal transaction concerned or the transfer concerned.

To protect our reputation, comply with the laws against money laundering and thus avoid any liability, it is essential not to become associated – even if innocently – with criminal activities and conduct business solely with reputable partners who operate in line with legal provisions and who use resources from legitimate sources. Truecaller's Employees and Truecaller itself must ensure that we do not receive the proceeds of criminal activities and carefully check the identity of our Business Partners and other third parties with whom we wish to do business.

8. Reporting compliance concerns

All Truecaller's Employees may, and are always encouraged to, report suspected violations of laws or this Code of Conduct to the local head of HR in India or Sweden depending on where the violation took place, or to the Compliance function at the Legal.

Truecaller makes available appropriate grievance mechanisms that are available to Employees and other stakeholders, including affected communities, to make comments, recommendations, or complaints concerning the workplace, the environment or business practices. You can file a report through emailing whistleblowing@truecaller.com.

This email will go to the Group Chief Legal Officer and Chief People Officer. Truecaller's whistleblower system is committed to protecting the whistleblower and the individual affected. We do not tolerate retaliation or pressure on whistleblowers.

Truecaller will treat all reports on potential misconduct seriously. You do not need proof of your suspicions, but all reports must be made in good faith. Reports in bad faith containing knowingly false and untrue allegations will not be handled. Such reports themselves constitute potential misconduct, which can be subject to internal investigations and potential sanctions against the person making such reports.



9. Consequences in case of violations



A fundamental principle within Truecaller is to conduct business in a manner compliant with this Code of Conduct.

Failures to comply with this Code of Conduct are taken very seriously by Truecaller and may result in disciplinary action, including termination of employment and legal action.