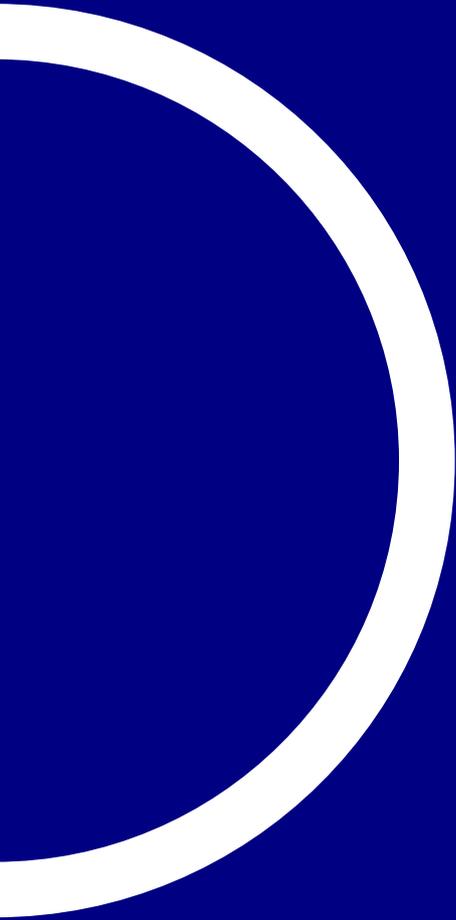


Sustainability Report 2020



Transcom

Contents

1. Transcom 2020	3
1.1 Transcom at a glance	4
1.2 CEO comment	7
1.3 COVID	8
1.4 Our sustainability approach	10
1.5 Transcom focus on what matters most	15
1.6 Stakeholder engagement	16
2. Transcom Cares	19
2.1 People development	20
2.2 Inclusion & Diversity	23
2.3 Community engagement	27
2.4 Environment	29
2.5 Business ethics	32
2.6 Security & privacy	34
2.7 How Transcom supports the Sustainable Development Goals	37
3. Report details	39
3.1 About the report	40
3.2 Workforce data	41
3.3 GRI Content index	43
4. Auditor's report on the statutory sustainability statement	48



1. Transcom 2020

1.1 Transcom at a glance

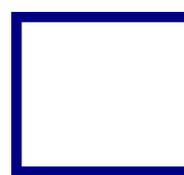
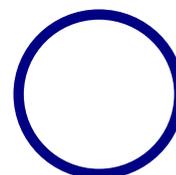
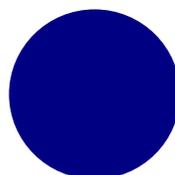
At Transcom Holding AB and its subsidiaries (hereafter Transcom) we are passionate about creating smarter people experiences. Every day, our customer experience specialists support our clients' customers with outstanding service. This sustainability report presents Transcom's sustainability efforts during 2020 and also outlines future plans of how Transcom will keep on supporting and enhancing the positive impact we can have on people and the planet.

Transcom is a global company with 28,480 customer experience specialists in 22 countries. This report also includes data from Awesome OS, located in the Philippines and the United States, and Xzakt Kundrelation AB, located in Sweden, both whom are part of the Transcom group. We offer outsourced customer relationship management through a wide variety of services like CX advisory, customer service, technical support, customer retention, customer acquisition, cross-selling and upselling as well as collections. In our daily work, our local customer experience experts serve our clients' customers over the phone, via chat, email, social media, and messaging services. We support our clients' digital agenda by combining our core services with leading digital capabilities and tools.

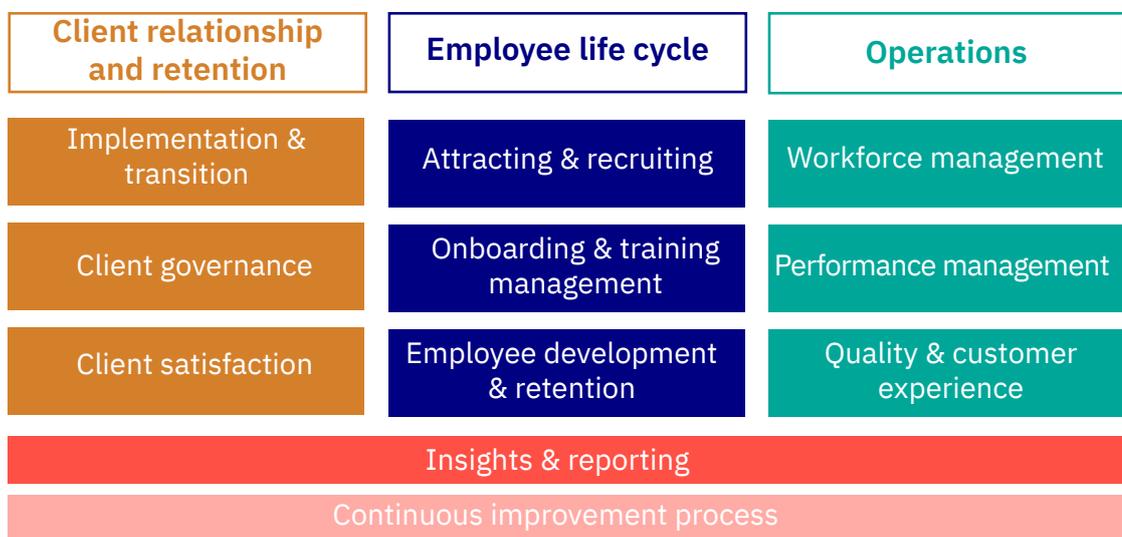
We deliver service to international brands within the Commerce & Tech, Services & Utilities and Cable & Telecom sectors.

The report also includes data from Transvoice, located in Sweden, and part of the corporate group. Transvoice is an interpretation and language services company.

Transcom's global headquarter is located in Stockholm, Sweden. Transcom is a privately-owned company where the majority owner is Altor Fund IV, together with significant minority investor Gunilla von Platen (founder and former owner of Xzakt Kundrelation), as well as key people from Transcom's management team.



Transcom's value chain and sustainability:



Value chain and its connection to sustainability:





Transcom at a glance 2020



28,480*
customer experience specialists
with

>33
languages

1.5 million
customer service
interactions per day

557.8m EUR
Revenue 2020

91.6m EUR
Total equity

243.9m EUR
Current debt**

* Albania, Bosnia Herzegovina, Canada, Croatia, Egypt, Estonia, Germany, Hungary, Italy, Latvia, Lithuania, Netherlands, Norway, Philippines, Poland, Portugal, Serbia, Spain, Sweden, Tunisia, United Kingdom, USA

** Includes IFR 16 (lease liabilities)

1.2 CEO comment

For 25 years, Transcom has been creating outstanding experiences for our clients and their customers around the world. 2020 was marked by the global pandemic, where we focused all our efforts on keeping our people safe and continuing to serve our clients. Thanks to the efforts of our amazing employees and the solid platform we built over the past years, we kept a steady course through the pandemic, not only continuing to be a sustainable employer to our employees and supplier to our clients, but also growing and hiring in an otherwise volatile market.

Our priority to create a better workplace for our employees became more relevant than ever, both for physical and virtual workspaces. Having the advantage of 15 years' experience in virtual work made a huge difference when shifting a large portion of our employees from brick and mortar sites to working from home – both from an employee and from a security and business continuity perspective. Our employee and client satisfaction rates from handling the pandemic are a testament to our efforts. The increased satisfaction scores for our employees, that went from 67% in the first quarter to 73% in the fourth quarter of the year, and clients, where 99% reported that they were satisfied with our responsiveness during the outbreak (NPS from 47 in H2 2019 to 49 in H2 2020) are a testament to our efforts.

Our past years' efforts to implement digital tools and processes for the entire employee lifecycle, made it possible not only to onboard new employees but continue to allow our employees to develop their skills.



During the past year, there was a continued increased focus on equality, diversity and inclusion, both at Transcom and in society as a whole. Being present in 22 countries, and with a long history of being an equal opportunity employer, we want to be a positive force for inclusion and diversity and are committed to stand up to our global company values.

In 2020, we made a major revision of our sustainability framework. Most importantly, we have rewritten our Code of Business Conduct, intensified training efforts and intensified our compliance efforts. Moreover, we have initiated a new materiality analysis to ensure that we are focusing on the relevant sustainability areas.

In this report, I'm pleased to present our sustainability performance during 2020 and our actions going forward.

Stockholm
Jonas Dahlberg

1.3 COVID

Responding to the global Covid-19 pandemic has meant a myriad of actions on different levels of the organizations, global and local. This is an overview of Transcom's actions related to our work to respond, recover, and evolve from a sustainability perspective. The overview is complemented with more detailed information related to separate sustainability topics throughout the report.

Global framework and local responsibility

With operations in 22 countries, all in different phases of the pandemic and with different levels of restrictions, Transcom formed a global crisis management team in early February to ensure a global governance structure and response, communications framework, and issue recommendations, complemented by local emergency response teams with clear responsibilities.

Our efforts have been guided by two critical missions. First and foremost, to keep Transcom's employees safe and avoid further transmission of the virus. Secondly, to contribute to keep society up and running, by ensuring continuity of service to our clients.

Modifying on-site operations: Strict hygiene measurements were enforced at all sites, including a higher frequency of disinfection and cleaning, offering protective equipment and alcohol-based rubs, or other measures deemed necessary in the specific location/site. A global process framework for how to deal with suspected or confirmed cases at site was rolled out. Apart from the global guidelines, each site followed the appropriate advice from local authorities to be compliant with new health and safety guidelines. Personal distance was enforced and a large number of agents moved to work from home.



This meant that we could safely continue to operate from the sites where it was not possible to shift to a work at home model from a security or infrastructure perspective.

Transitioning to remote work: More than half of Transcom's employees were moved to a work at home (WAH) model, from only 6% of the global workforce on March 16, to over 50% by March 31. On December 31, 2020, over 60% of the global workforce were working from home.

To support this, for many countries, new way of working, a comprehensive operational handbook was created and implemented across the organization. It builds on the experience of our North American organization, where we have 15 years' experience of providing WAH services and are a COPC certified WAH provider. It provides structured guidelines for the implementation of WAH, and an overview of technology, security, and tooling.

More than a technical manual, the handbook is also a comprehensive guide for key considerations when it comes to remote management of the workforce; from new ways of working and structured interactions between agents and supervisors, to how to create a great culture and engaging with a remote workforce.

Recruitment and onboarding: With an increase in demand from current clients and an inflow of new contracts, Transcom digitalized the entire recruitment and onboarding process.

Keeping stakeholders close: Consistent, clear, and timely communication with all key stakeholders – employees, clients, authorities, and unions.

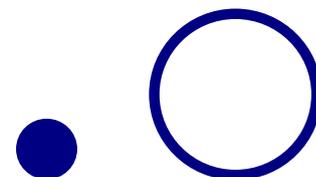
“ Transcom continues to step up during this crisis and we are certainly thankful for that and we will not forget how well you guys have supported all of this. Thanks!

Vice President for Operations

“ Our Transcom team has worked feverishly to manage through the impacts of Covid 19, navigating through a shifting landscape of quarantine, lodging, and the blitz of getting as many team members as possible to work from home has been a daunting task.

Please accept a big thank you from our team and most importantly our customers for your continued commitment. This is a partnership in working through this together.

*VP of Contact Center,
Global Electronics Retailer*



1.4 Our sustainability approach

Sustainability has always been an integral part of our corporate strategy, business culture, and day-to-day operations. During 2020, we increased our efforts in becoming a more sustainable business.

We reviewed our sustainability program Transcom Cares to focus our efforts in six core areas that we consider the most material to our operations. Each area has an executive sponsor leading the efforts, setting and following up on targets.

People development: Actively empower and support our people in their current role and future career. Executive sponsor: Chief People Officer, Eva Wikmark Walin

Inclusion & diversity: Create an inclusive and diverse workplace. Executive sponsor: Chief Executive Officer Global English Region, Mark Lyndsell

Community engagement: Unlock the power of local communities by actively contributing to the overall equality, opportunity, and sustainability. Executive sponsors: Cluster Managing Directors

Environment: Reduce and mitigate our negative environmental impact through the way we think, act, and procure. Executive sponsor: Chief Financial Officer, Snejana Koleva

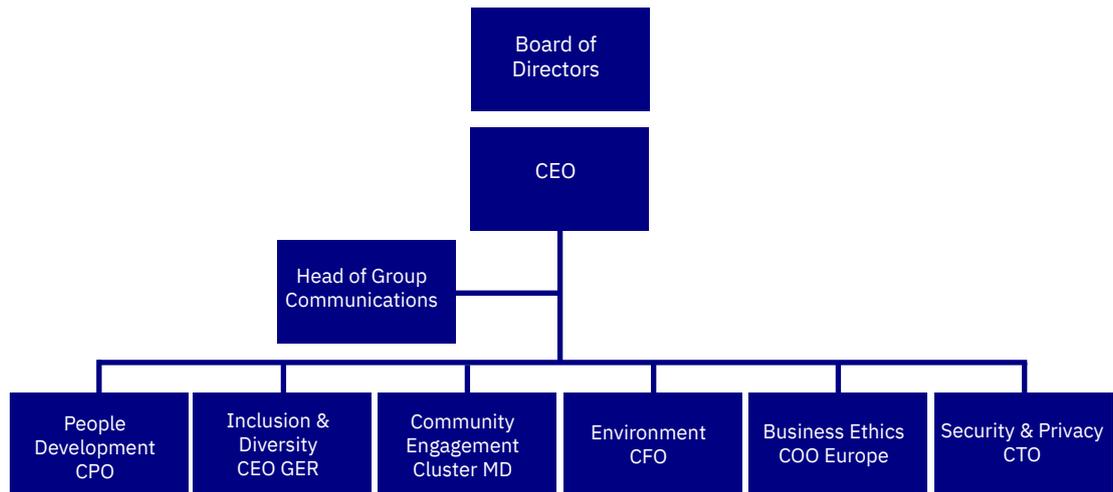
Business ethics: Ensure that our actions, interactions, activities, and decisions are rooted in a core sense of ethics and responsibility. Executive sponsor: Chief Operating Officer Europe, Steffen Bagge

Security & privacy: Be trusted by employees, clients, and clients' customers to handle their data and safeguard integrity and privacy. Executive sponsor: Chief Technology Officer, Stefan Berg



To ensure that we progress within each area of sustainability, the audit committee and the Board of Directors conduct regular follow-ups on each sustainability topic. The CEO has overall responsibility

for sustainability, supported by The Head of Group Communications who leads the development of our sustainability framework, reporting, and communication.



We also intensified our stakeholder dialogues for a new materiality analysis, to ensure that we are focusing our efforts where we have the greatest potential social, environmental, and economic impact.

Risk management and governance

Transcom’s risk management and control framework is designed to support the identification, assessment, monitoring, and management of risks that are significant to the achievement of Transcom’s business objectives.

Risk	How it may impact Transcom	Transcom's management of risk
Talent attraction and retention risks	If Transcom is unable to attract and retain skilled staff, this may adversely impact the Company's business. The customer care outsourcing industry is prone to high staff attrition.	Transcom has deployed robust talent management and career development programs that help us in talent retention. Furthermore, the Company carries out periodic employee satisfaction surveys and other benchmarking exercises to identify improvement areas and further strengthen our position as an employer of choice in our industry.
Risks of breach of data privacy	<p>Today's business environment is faced with the risk of data theft or data leakage (client, customer, and employee data). The challenge is to ensure that security controls and practices are sufficient to mitigate those risks.</p> <p>Data privacy is also subject to frequently changing rules and regulations, which sometimes conflict among the various jurisdictions and countries.</p>	<p>Transcom has reviewed the entire Data Privacy framework and taken necessary measures in order to fully comply with the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679). An external Data Processing Officer (DPO) supports the organization in the implementation process of the regulation, as well as continuously give guidance and solid advice in GDPR related matters.</p> <p>We continue to monitor developments and new requirements to ensure that we have a strong and consistent data protection framework.</p>
Employee misconducts	Our employees owing to the inherent nature of the industry and service offerings may be able to perpetrate frauds or other misconducts which may not only affect Transcom, but also its clients. Most of the client contracts hold Transcom liable for damages and/or liabilities arising due to fraud.	We collaborate with our clients continuously to identify and address fraud risks in a structured manner. We have secured insurance against such misconduct.
Fraud, corruption and other unethical practices	We have operations in countries that have been assessed as riskier for corrupt practices. Any corrupt practices engaged in by our employee(s) may affect our goal to be a responsible corporate citizen.	We have zero tolerance towards any corrupt and unethical practices. Our Code of Business Conduct is available in 17 languages. All our employees sign this document when they start their employment, and undergo a refresh training every second year thereafter. They are given suitable training on the key values of the Code. All managers receive relevant training on this topic regularly.

Governance

A well-defined sustainability governance structure is the foundation for successful management of sustainability. Transcom has policies within all relevant sustainability areas, including the fundamental principles of how everyone at Transcom should act. The policies are owned by the Board of Directors and revised on an annual basis.

In 2020, we initiated a major revision to our policy framework, reviewing the content in the policies to ensure that they are relevant and easily understood, and the governance framework, from securing the communication, signing, and training processes, to streamlining a global compliance process including monitoring, risk assessments, and internal audits. The new policy framework will be rolled out in the first half of 2021.

Our Code of Business Conduct sets expectations and guidance for how we conduct business. It helps us make sound, legal, and ethical decisions, and provides us with guidance to further information. It covers human rights, labor rights, environmental protection, and anti-corruption practices and ensures that we act with integrity towards all our stakeholders. Transcom is dedicated to doing business in line with international initiatives and sustainability standards, such as the OECD Guidelines for Multinational Enterprises, the UN Global Compact, the Fundamental Conventions of the International Labour Organization, the UN Universal Declaration of Human Rights, and the UN Guiding Principles on Business and Human Rights. The Code applies to all Transcom employees,

consultants, contractual partners, and board members, and we require all employees to certify their acceptance of adherence upon hire, and every second year thereafter. In 2020, we did a global Code of Business Conduct refresh training for all employees with more than two years of service, with a completion rate of 90%. The Group management is responsible for ensuring compliance with the Code of Business Conduct, followed up continuously within the day-to-day operations. Through our onboarding and regular training program, the awareness of our code is high.

Our Supplier Code of Business Conduct sets out the standards which all suppliers providing products and/or services to Transcom as well as the suppliers' employees, consultants, and sub-contractors, are expected to comply with. The code embodies requirements within human rights, labor rights, environmental protection, and anti-corruption practices. We take effort to include the Supplier Code of Business Conduct in all significant procurement processes. During 2020, we did not have any complaints related to our Supplier Code of Business Conduct policy.

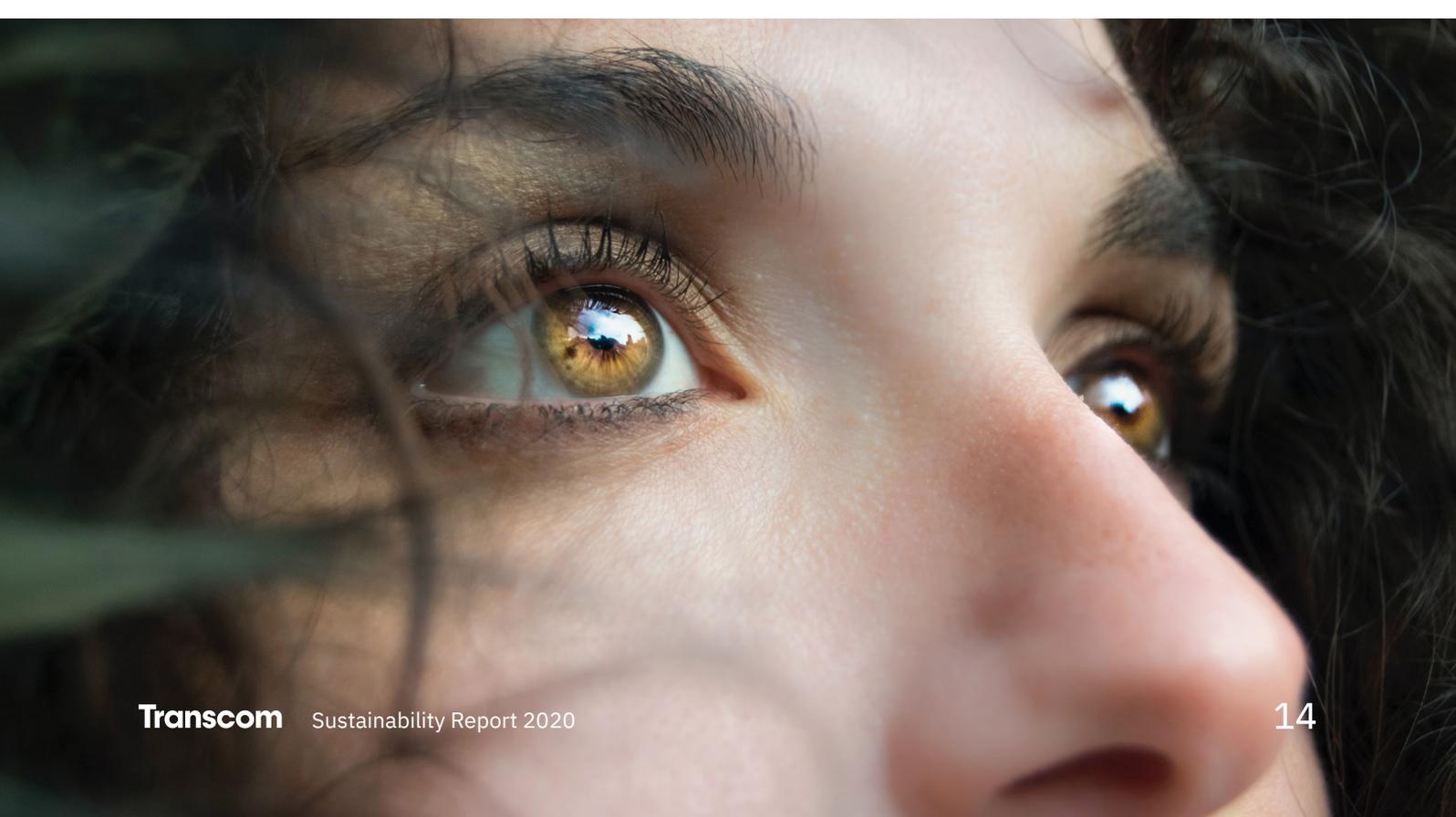
We are committed to the highest possible standards of openness, honesty, integrity, ethics, and accountability, and have a zero-tolerance for wrongdoings. Through our Code of Business Conduct, we vow to take appropriate action when wrongdoing happens, and we promote a culture where anyone at Transcom feels safe and is encouraged to act and report any wrongdoings related to our operations.

Our **Whistleblower policy** is an essential part of this commitment. Transcom encourages our employees and suppliers to report any suspected non-compliance with the Code of Business Conduct and Supplier Code of Business Conduct. Anonymous complaints can be sent in through email, mail or in a form that can be accessed via our intranet for employees. Once a complaint or malpractice is received they will go through a confidential assessment process. It is of great importance to Transcom that the reporter has the option to stay anonymous.

The investigation process depends on the subject matter of concern. Depending on the situation it could be escalated to the Chairman of Transcom's Board of Audit Committee, an independent auditor, or the police or other law en-

forcement authority. The reporter will be notified about the progress and what actions have been decided unless circumstances do not permit it. During 2020, we had 17 reports via the whistleblower function and 2 additional through other ways of reporting. The reports have been concerning work environment, fraud, threat, harassment, and corruption. All reports were investigated, and one case, regarding harassment, led to a disciplinary action.

Transcom's slavery and human trafficking statement (in accordance with the UK Modern Slavery Act) is a step taken in our measures to strengthen human rights protection throughout our value chain. All forms of modern slavery, forced or child labor, exploitation and servitude are prohibited at Transcom.



1.5 Transcom focus on what matters most

At Transcom, we have continuously developed our materiality analysis since 2012. The materiality analysis allows us to identify our most material sustainability issues within human rights, labor rights, environmental protection, and anti-corruption. It forms the basis for our sustainability framework, targets and daily operations. During 2020 we have done major updates in our materiality analysis process through updating our sustainability topics (see updated topics on page 17) to ensure alignment with today’s most critical topics and developed a more continuous and closer stakeholder engagement. The results of these engagements will be worked on during 2021 and presented in the sustainability report for 2021. Furthermore, the selection of topics was guided by frameworks such as the Global Reporting Initiative, UN Global Compact, the Sustainable Development Goals and our updated sustainability framework.

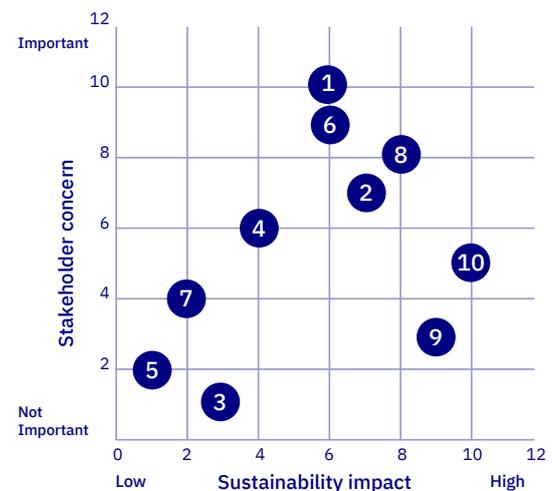
In the materiality analysis, we have prioritized the sustainability topics through two common methods; stakeholder dialogues and impact analysis. The impact analysis was conducted to understand how the sustainability issues impact our business’ value chain and its stakeholders. In the impact analysis, we analyzed how the sustainability topics impact Transcom and our operations as well as how Transcom impacts the topics throughout our value chain.

All topics shown in the top right corner of the matrix are considered the most material and these are the topics that Transcom focuses on the most.

The materiality matrix is from 2019 and is under revision. The updated materiality matrix will be presented during 2021.

Materiality matrix

In 2019, we began the process of conducting a new materiality analysis, starting with updating our topics. We are currently conducting stakeholder dialogues to finalize the materiality analysis with new input from our different stakeholders.



- 1 Endorse training and talent management
- 2 Ensure customer data protection and security
- 3 Have ethical and environment friendly suppliers
- 4 Safeguard non-discriminatory and ethical conduct towards end-customers
- 5 Initiate energy reduction at offices
- 6 Promote equal opportunity and diversity among employees
- 7 Reduce and have proper disposal of e-waste
- 8 Support community engagement
- 9 Take proactive anti-corruption measures
- 10 Take proactive measures against fraud

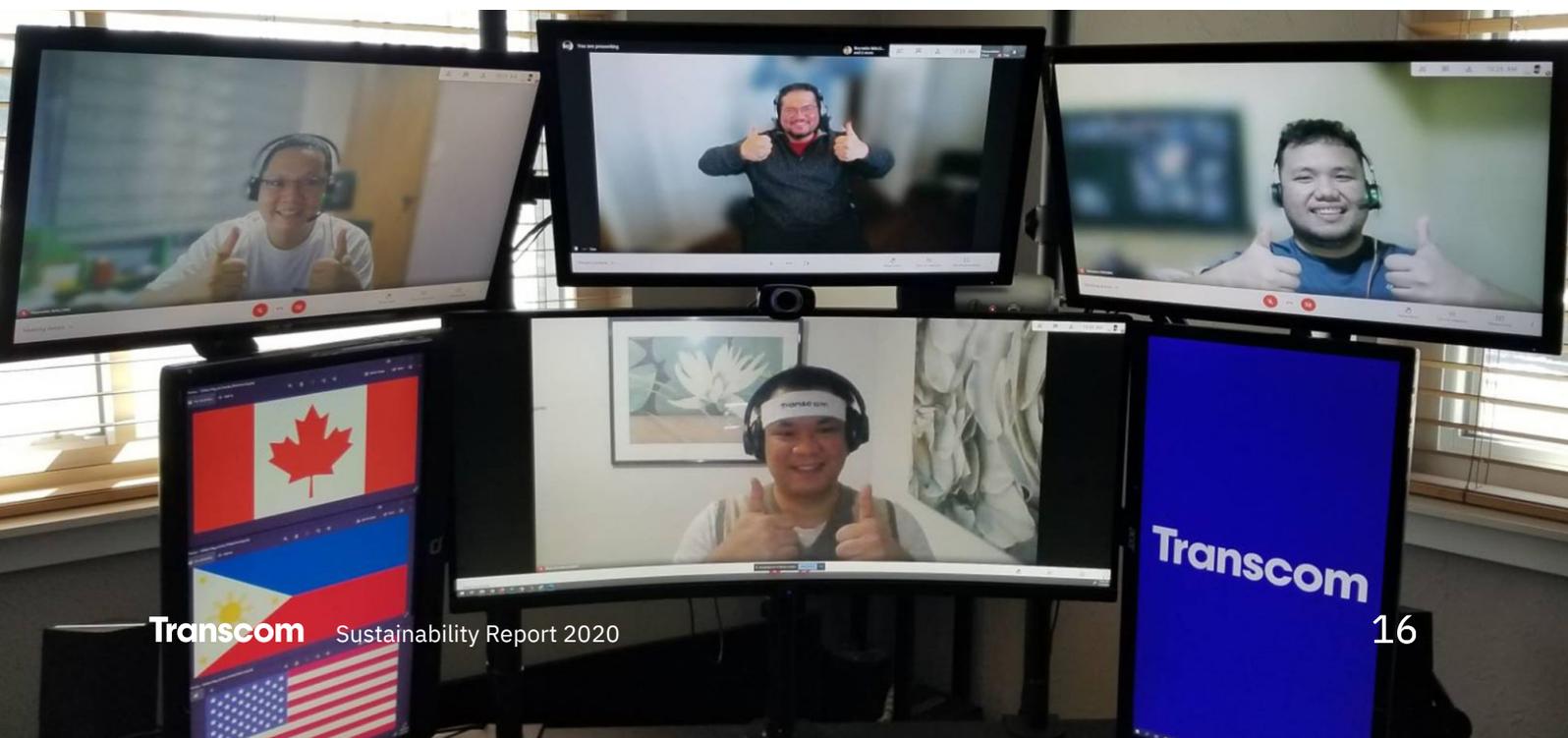
1.6 Stakeholder engagement

At Transcom, we believe it is of great importance to ensure that our sustainability strategy is in line with what stakeholders think is important. With operations in 22 countries and a great number of stakeholders, there are many expectations to consider. To ensure that our stakeholders are being heard, we have initiated an internal structure that ensures close, integrated and continuous dialogues with our most relevant stakeholders which are stakeholders that have an interest in Transcom and sustainability as well as the ones we may impact. The stakeholders we have identified as most relevant are our employees, owners, investors, and clients.

This year we have initiated a process for biannual dialogues with our key stakeholders through surveys and interviews. All of our employees are invited to submit their feedback on our sustainability strategy through a survey available in 17 languages. We are also conducting interviews with clients, selected to form

a representation of our global client base, owners, and investors. We are using a decentralized approach for the stakeholder interviews, where individual functions are engaging with their key audience, to encourage continuous dialogues around sustainability in the day to day operations apart from the formal biannual dialogues. These dialogues help us prioritize critical issues, and provide insight on emerging opportunities and trends. The results from the survey and interviews will be analyzed and presented in the coming year and is highly prioritized.

The input received from our previous stakeholder engagements is summarized into our materiality analysis presented below. The most important sustainability topics per stakeholder group are also presented. Thanks to our stakeholders who help us lay the foundation for our sustainability framework, we continuously improve as an organization.



Topic	Definition
Attract and retain a talented and engaged workforce Training and development	Ensure that employees want to work and keep working at Transcom. This could e.g. be done through, a high standard of working conditions, skills development and talent management.
Health and well-being at work	Transcom should ensure that all employees are healthy and easily can attain a healthy lifestyle. This can e.g. be done through wellness programs, focusing on ergonomics, ensuring work-life balance or having an available therapist at the offices.
Ensure equal opportunities and diversity among employees and management	Ensure an equal and diversified workplace and actively counteract discrimination in Transcom's operations. E.g. through active measures, policy documents, risk assessments, training and internal routines.
Support community engagement	Transcom should facilitate and encourage community engagement, especially when the initiatives have a strong connection to Transcom's core business.
Reduce energy consumption and greenhouse gas emissions in own operations	Ensure that energy and greenhouse gas emissions are continually decreasing in Transcom's operations and when travelling.
Reduce and have proper disposal of e-waste	Minimize e-waste in Transcom's operations as well as ensure sustainable and safe e-waste management. Transcom also extends the life of electronics for as long as possible and consider buying refurbished electronics if possible.
Safeguard non-discriminatory and ethical conduct towards end-customers and clients	Ensure that clients and customers are treated in a non-discriminatory way and that customer experience specialists actively counteract discrimination. This can be done through policy documents, training and internal routines.
Counteract fraud, bribery, and other corrupt practices in customer, client, and supplier interactions	Transcom should proactively work against bribery, nepotism, facilitation payments, embezzlement and other corrupt practices through implementing a robust governance system. The governance system should ensure compliance with national and international legislation on corruption issues like Foreign Corrupt Practices Act (FCPA) and UK Bribery Act. Counteract and proactively work against fraud, bribery and other corrupt practices while handling customer and client interactions through e.g. policy documents, risk assessment and internal routines.
Sustainable supply chain	Ensure compliance with human rights, labor rights, environmental and anti-corruption requirements in Transcom's supply chain. This includes compliance with international sustainability guidelines like the UN Global Compact as well as national legislation like the Modern Slavery Act in the UK.
Ensure customer and client data security and privacy	Ensure customer data privacy and security through e.g. safe handling of personal information as well as GDPR and California Consumer Privacy Act compliance

Most important topics per stakeholder group

Most important aspects per stakeholder group from 2019:

Employees

- Be an equal opportunity employer
- Be transparent with financial reporting
- Work proactively with anticorruption

Owners

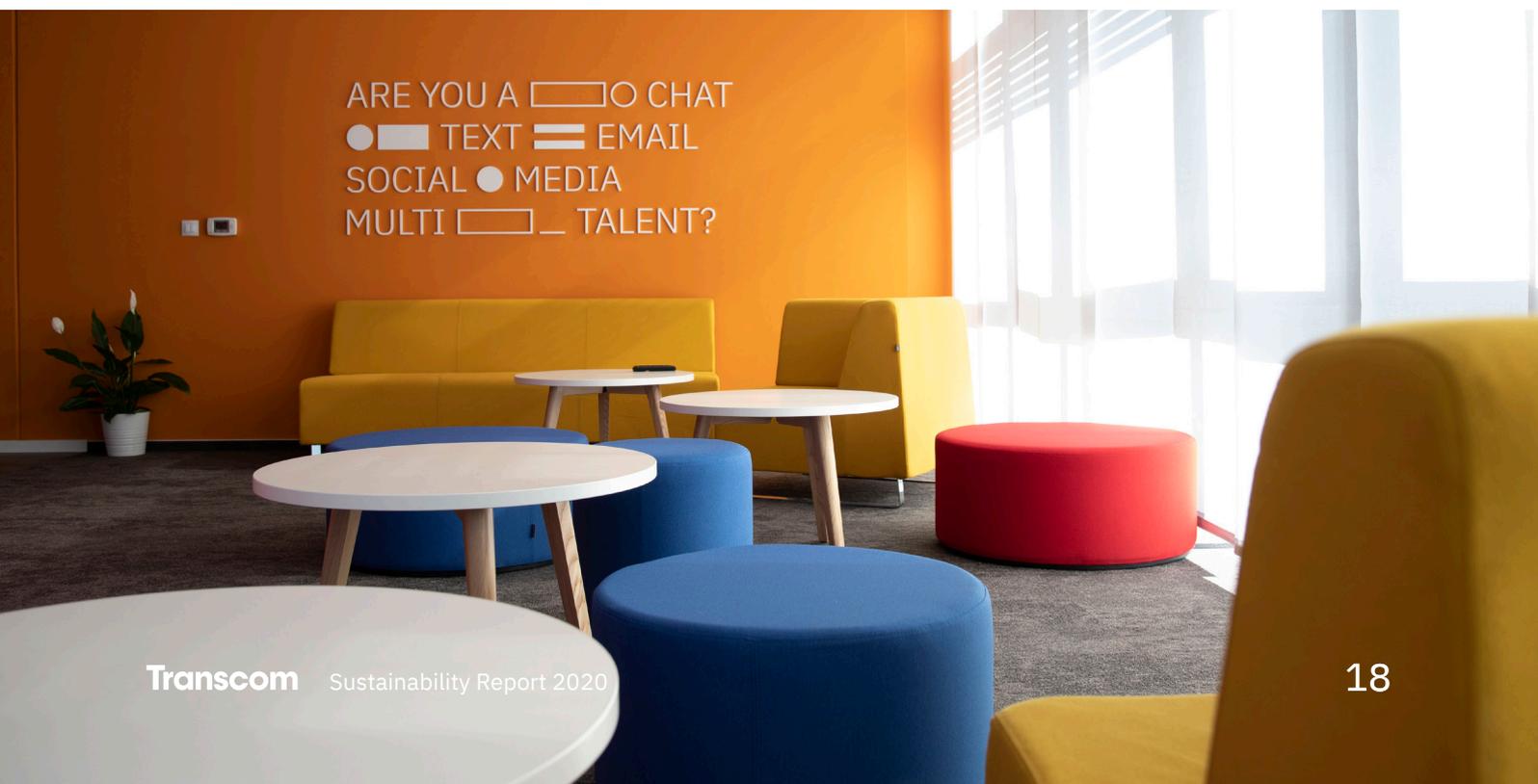
- Provide continuous training for employees
- Be transparent with financial reporting
- Have fair and transparent recruitment practices

Investors

- Provide continuous training for employees
- Be transparent with financial reporting

Clients

- Have fair and transparent recruitment practices
- Be an equal opportunity employer
- Focus on fair working conditions for employees





Transco

2. Transcom Cares

2.1 People development

We are proud of the role we play in the lives of our current and former employees. Our agents learn about direct client interaction in a dynamic environment, strengthening their communication and technology skills, and helping them grow in their future careers.

Training

In 2020, we finished the global rollout of our new internal learning experience platform, T:University. It uses a single sign on and cloud based solution that enables learners to access it anywhere around the globe, and from any device. T:University features a digital course catalog with over 200 courses, of which over 40 are focused on career development, providing the learner an overview of content focused on competency development and corporate compliance. T:University continues to shape the employee experience by empowering the employees to chart their career roadmap through the **T:Learning Path**,

which promotes self-paced learning by giving access to curated content in the course catalog. The T:Learning Path also identifies experiential learning methodologies based on the employee's profile and developmental needs. Transcom recognizes the need for continuous learning, and is constantly improving and expanding the courses offered.

Career development

To ensure that our employees constantly learn and are given an opportunity to grow and flourish, we have a clearly defined process for career progression, either as a line manager or in a specialist role. Transcom Discover, our program for professional development, uses a phased approach in career development to build the internal talent bench. It is enabled by T:University and the T:Learning Path, and supported by The Coach, an online performance review tool which includes performance reviews every 30, 60, and 90 days.

“ Our long-term success depends on our ability to attract, develop, and retain the right people. Our mission is to actively empower and support our people in their current role and future careers.

*Eva Wikmark Walin,
Chief People Officer,
executive sponsor*



In 2020, we started rolling out a new program for our frontline leaders, the Team Leaders (TL). The program gives our over 1,300 TL's a solid basis for their work, developing their leadership skills, and helping them to develop the agents they work with. By setting clear targets for each employee, performing regular performance reviews, and establishing career development plans, we are supporting each employee's opportunity to grow.

We recognize the importance of our employees receiving regular performance reviews and career development plans, and are happy to see that our employees' perception of career development opportunities was on a steady rise throughout the year's three Pulse surveys, from 52% in the first quarter to 76.5% in the fourth quarter, with a yearly average of 57.2%.

Manager feedback for skills development also had a steep rise, from 79%

in the first quarter to 87.1% in the fourth quarter, with a yearly average of 81.3%. We will continue to monitor and report on these parameters, aiming to constantly improve the rates.

Employee satisfaction

During 2020, we went from an annual employee satisfaction survey to Transcom Pulse, a faster, shorter survey performed three times during 2020, covering leadership and engagement, organization and working conditions, personal satisfaction and communication.

In the three surveys performed over the year, we saw the global satisfaction score go up from 67 in the first quarter to 73% in the fourth quarter, with a yearly average of 71.6%. We improved the process for putting the feedback from our employees into concrete actions, driving improvement in the day to day life for our employees. This is done both on a local and a global level.



Our target is to constantly improve the global satisfaction scores, measured quarterly in our employee Pulse survey. During 2021, we are also adding a new metric, employee engagement scores, that we will measure and report going forward.

Creating jobs in emerging markets and developing countries

As a big employer in many of our geographies, and the first employer for many of our employees, we have an extremely important role to play.

Providing job and career opportunities, being an equal opportunity employer, ensuring good working conditions, and continuing to develop our employees, also contribute to the overall sustainability of local communities.

During 2020, we created 453 new job opportunities in emerging markets and developing economies* by expanding our presence and opening up new offices, making our total number of employees in these countries account to over 16,500.

Through our strong focus on training and employee development, we impact the Sustainable Development Goal 4. Quality Education since we increase the number of employees with relevant skills for employment and to promote sustainable development.

Topic	Targets 2021-2023
Attract and retain a talented and engaged workforce	Measure and constantly improve global employee satisfaction score and employee engagement score (new metric from 2021) through our quarterly employee surveys
Health and well-being at work	
	Create job opportunities in emerging markets and developing economies*

** As defined by the International Monetary Fund: Albania, Bosnia and Herzegovina, Croatia, Egypt, Hungary, Philippines, Poland, Serbia, Tunisia, increase of employees per 31 Dec 2020 compared to last year*

2.2 Inclusion and diversity

Transcom respects and encourages the value of diversity reflected in our various backgrounds, experiences, and ideas, and we have a zero tolerance for discrimination. We are dedicated to providing an inclusive work environment that fosters respect for all our coworkers, clients, clients' customers, and business partners, treating each other fairly and with respect. We provide equal opportunities to all qualified candidates and employees – Transcom is a meritocracy where all evaluations are based on competence, qualifications and performance. Diversity and inclusion broaden our perspectives, helps us drive innovation, make better decisions, and understand our different clients and their customers better.

In 2020, A global HR task force for inclusion and diversity was formed, to ensure that a solid foundation is in place to drive and support local and global initiatives. The project team has representatives from all Transcom geographies and aims to transform the collected internal best practices and external input to a Diversity, Equity and Inclusion framework, including updating HR policies and processes as well as culture and leadership strategies.

Another way that we are scaling our diversity, inclusion, and belonging initiatives is through the formation of a local Diversity Council that was recently implemented in North America.

“ To win in a competitive market we need to think new. To think new, we need all perspectives. Inclusion and diversity for a company like Transcom are as natural as necessary. Our mission, simply put, is to create an inclusive and diverse workplace.

*Mark Lyndsell, CEO
Global English Region,
executive sponsor*



Our goal is to continue evolving our company culture so our diverse workforce feels comfortable bringing their authentic self to work, allowing everyone to contribute to their best ability. The council promotes a different focus each month, aiming to increase knowledge, awareness, and belonging. This is achieved through learning resources and events, employee spotlights, celebration of diversity holidays, and activities encouraging employee self-expression. Information is shared through the intranet, employee newsletters, and the external social media channels. The feedback from our employees has been very positive, and we are encouraging all other countries to follow their good example.

Recruitment

Our digital recruitment practices minimize hiring biases through the validated screening algorithm used at the beginning of the process. By combining technology and human intelligence, we can find the best candidates with the correct skills for the position. We are aware of the potential issue with biased AI and actively work with our suppliers and internal innovation teams to ensure that the ethical concerns of AI and robotics are minimized.

Training

We believe that increased awareness is the first step towards becoming a truly inclusive and diverse company. In 2021, we will introduce mandatory training for managers on diversity, unconscious bias, and how to build an inclusive culture. Our target is to have a course completion rate of 100% for this program from 2022, to support an increase of inclusion of underrepresented talent. Our global e-learning platform T:University and the courses it offers is available to all employees in all locations.

Work environment

We acknowledge that the work environment, both physical and virtual, can be a hinder for inclusion. This is one of the aspects we consider in our ongoing project to renovate and revitalize our sites to provide our employees with a workplace that supports their physical health and mental wellbeing.

In 2020, due to the pandemic, over 50% of our staff started working from home. We adapted recruitment and operational practices to ensure that also the virtual workplace would support employee wellbeing. Acknowledging that providing work-at-home opportunities can also increase the inclusion of people with disabilities, we will continue to offer work-at-home opportunities for all job levels in all countries also after the pandemic, making it easier to join, and grow with Transcom without the need to commute to a physical location.



Gender equality

Transcom has a history of working with equal pay for equal work and having a sound gender balance for managers, which is visible in the numbers. On a global level, we have 60% women in the group, and 42% female managers globally. However, we have room for improvement, and a number of initiatives to improve the representation of women in management are under way. We have an equality and diversity policy for our Board of Directors, which is annually monitored. Our goal is to have a sound 50/50 gender balance on all levels of management.

Open and transparent dialogue

We value the opportunity to engage in open dialogue with our employees across the company and we respect our employees' right to freedom of association. At Transcom, 27% of employees are covered by collective bargaining agreements. The percentage represents employees from Italy, Norway, Spain, Sweden, and Tunisia.

Gender distribution of employees



Executive management



Managers



Topic	Targets 2021-2023
Ensure equal opportunities and diversity among employees and management	Improve the representation of women in management, with a goal of gender balance (50/50) on all levels
	Training 100% of managers on diversity, unconscious bias and how to build an inclusive culture to increase inclusion of underrepresented talent

GRI	Gender distribution of employees		
405-1	Global	Male	Female
	Executive managers	67%	33%
	Managers	58%	42%
	Employees	40%	60%
	Europe	Male	Female
	Managers	58%	42%
	Employees	36%	64%
	Global English Region	Male	Female
	Managers	58%	42%
Employees	45%	55%	

GRI	Age distribution of employees			
405-1	Global	Age <30	Age 30-50	Age >50
	Executive Management	0%	73%	27%
	Managers	19%	71%	10%
	Employees	48%	45%	7%
	Europe			
	Managers	12%	80%	8%
	Employees	38%	52%	10%
	Global English Region			
	Managers	22%	67%	11%
Employees	60%	37%	3%	

GRI	Diversity of the Board			
405-1	Gender	Male	Female	Other
		100%	0%	0%
	Age	Age <30	Age 30-50	Age >50
		0%	50%	50%

GRI	Executive salary & remuneration – ratio women to men*		
405-2	Global	Basic salary	Remuneration
	Executive Management	42%	49%
	Managers	89%	99%
	Employees	96%	95%
	Europe		
	Managers	88%	103%
	Employees	97%	97%
	Global English Region		
	Managers	95%	92%
Employees	91%	91%	

*Managers excluded in Global English Region: UK, USA
 Managers excluded in Europe Albania, Bosnia-Herzegovina, Croatia, Egypt, Estonia, Germany, Hungary, Latvia, Lithuania, Norway, Poland, Portugal, Transvoice

2.3 Community engagement

Our mission: Unlock the power of local communities by actively contributing to the overall equality, opportunity, and sustainability.

Transcom has a history of having a strong focus on local community engagement driven by our passionate employees. In 2020, many activities were related to the ongoing pandemic, both to help our colleagues in need and the societies around us.

Transcom has two critical missions in the ongoing Covid-19 pandemic. First and foremost, to keep Transcom's employees safe and avoid further transmission of the virus. Secondly, to contribute to keep society up and running, by ensuring continuity of service to our clients. By doing so, we assist people all over the globe who need to order and pay for supplies and groceries online, and the delivery of those goods. We support people's need to communicate. We solve technical issues so that people can work from home. But many of our local offices had the opportunity to do even more.

In Italy, Transcom supported Lecce municipality by activating a free service via WhatsApp to facilitate the distribution of shopping vouchers to families in need. Seven agents monitored the channel answering questions for two months. What is more – this public service went from idea to go live in less than a week!

In Lithuania, eleven employees volunteered at the National Public Health Center to call and communicate with quarantined residents, and those who had contact with potentially infected people.

In Spain, our employees' children drew Christmas cards that were sent to elderly homes severely affected by Covid-19, wishing them a merry Christmas, since they could not receive visitors.

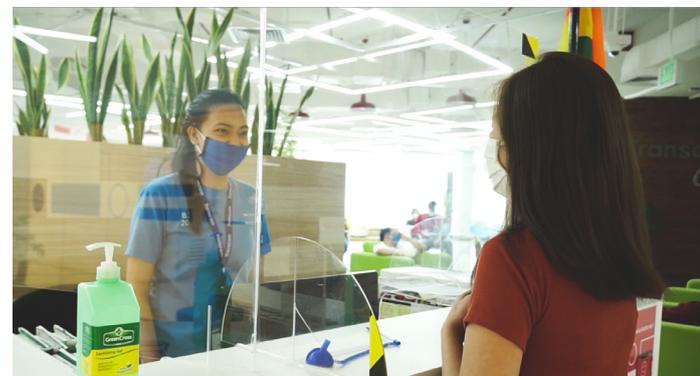
Our Italian and Polish organizations donated a total of 3,000 facemasks, and in Serbia, the local organization donated 12 transportation beds for ambulances.



The Philippines faced one of the hardest lockdown in the world. On March 16, an enhanced community quarantine was instated, meaning no public transport, no school at any level, all non-essential businesses closed, checkpoints with uniformed personnel placed at borders in all cities, a curfew from 8 pm to 5 am daily, and no air travel. PBOs were only allowed to operate onsite provided that a skeletal workforce was maintained, that temporary accommodation on the site or in the near proximity was provided for this workforce, and that social distancing was strictly observed.

Transcom responded by transferring as many employees as possible to work from home, but border restrictions between localities and limitations in work at home setup contributed to employees in need of financial support, among them solo parents, senior citizens, heads of families and breadwinners. Through cash donations from employees and clients, as well as PTO credit donations from our employees, Transcom raised enough funds to provide for them through the Kaagapay fund.

These are just a few of the many activities our people have engaged in during the past year, making us all proud to be Transcom – we are stronger together!



Topic	Targets 2021-2023
Support community engagement	All countries have a defined community engagement plan that they actively work with

2.4 Environment

Transcom is taking a proactive approach to ensure environmental protection and mitigate our negative environmental footprint. Our environmental impact is identified within three main areas; e-waste, business travel, and energy consumption within our office facilities. To minimize our impact, our environmental policy helps steer our employees in the right direction and in our operations we always follow the precautionary principle.

E-waste

Information technology plays a fundamental role in our business. We continuously seek to prolong the lifecycle of our IT products to lower the amount of e-waste, and to be part of a more circular economy. We recognize the importance of the Waste Electrical

and Electronic Equipment Directive (WEEE Directive) and the local waste regulations in the countries where we are present.

Refurbished equipment is purchased if possible, and if new electronics need to be procured, we select retailers with a high standard of environmental certifications, such as Energy-star, to reduce greenhouse gas emissions and other pollutants.

When the equipment needs to be disposed of, it is taken care of by local facilities or third parties with adequate knowledge of sustainable end of life solutions. The disposal of e-waste is under the responsibility of local management, however, during 2021, we are developing a global governance program to ensure a holistic approach to our e-waste footprint.

“ Climate change is a major threat to our planet. We are far from powerless to fight the crisis, but we need to act. For Transcom, this means to reduce and mitigate our negative environmental impact through the way we think, act, and procure.

*Snejana Koleva,
CFO Transcom,
executive sponsor*



Business travel

Transcom has a strict travel policy, and a rigorous approval process to book business trips to avoid unnecessary travel. Our global workforce is encouraged to use technological solutions instead of traveling. For 2020, due to minimized travel because of the pandemic, we see a dramatic decrease of our scope 3 emissions, -78%. The emissions from scope 1, company cars, was reduced from 628 tonnes co2e 2019 to 145 tonnes co2e 2020, or 77%.

In 2020, we transformed larger company gatherings from physical events to an electronic format, also allowing us to meet more often and include more people. The positive effects and employee reception of these events will lead to a lasting change in the way we work with events and internal communication.

Office energy consumption

When we are looking for new office facilities, energy-efficient solutions are preferred. At all our offices, sound environmental practices are in place such as waste separation, recycling and energy-efficient behavior. From March 2020, approximately 50% of our global workforce were working from home. This is clearly visible in the scope 2 emissions, where we see a 24.4% reduction compared to 2019. Recognizing that the data for 2020 reflect an extraordinary year, will continue to actively seek to reduce scope 2 emissions, and increase the share of renewable energy, through choosing environmentally certified buildings when selecting new office locations.

Through our environmental actions, we contribute to the Sustainable Development Goals 7. Affordable and clean energy and 13. Climate action on a target level through increasing the share of renewable energy as well as improve awareness-raising on climate change mitigation.

Topic	Targets 2021-2023
Reduce energy consumption and greenhouse gas emissions in own operations	Actively seek to reduce our energy consumption year over year: <ul style="list-style-type: none"> Reducing scope 2 emissions through choosing environmentally certified buildings when selecting new office locations Reducing Scope 3 emissions through smarter traveling and investing in technical solutions for meetings
Reduce and have proper disposal of e-waste	Ensure global governance for proper handling of e-waste

GRI 302-03

Energy intensity (Mwh/employee)		
	2020	2019
	0.892	1.281
Co2e intensity (Mwh/employee)		
	2020	2019
	0.233	0.382

GRI 305-1, GRI 305-2, GRI 305-3

Total CO2e emissions (tons)		
	2020	2019
Scope 1	145	628
Diesel	141	606
Gasoline	4	22
Scope 2	6,267	8,289
Electricity	5,363	7,984
District heating	834	214
District cooling	69	91
Scope 3	219	996

Scope 1 emissions occur from sources that are owned or controlled by Transcom. This includes emissions from company cars.

Scope 2 emissions accounts for emissions from purchased electricity, heating and cooling consumed by Transcom.

Scope 3 emissions accounts for emissions that are not owned or controlled by Transcom but occur due to Transcom activities. The disclosed data includes emissions from business travel.

GRI 305-1

Energy & fuel					
	2020		2019		
Diesel	54,200.9		234,260.2		Liter
Gasoline	1,895.2		10,077.8		Liter
	Renewable	Non-renewable	Renewable	Non-renewable	
Diesel	155.5	371.5	671.9	1,605.7	MWh
Gasoline	0.9	16	5.0	85.2	MWh
Electricity	3,019.7	16,642.9	3,497.0	23,487.5	MWh
District heating	40.3	4,742.7	44.9	1,215.9	MWh
District cooling	16.9	393.0	20.8	517.1	MWh
Total energy in Mwh	25,399		31,151		

2.5 Business ethics

Anti-corruption

Transcom does not tolerate any form of corruption, whether direct or indirect, by employees or business partners who act on our behalf. We have reduced the likelihood of corruption in our day-to-day operations by implementing a zero-tolerance to all types of corrupt practices with the help of steering and policy documents. Anti-corruption is part of our Code of Business Conduct and Supplier Code of Business Conduct that require our employees, partners, and suppliers to comply with all applicable national laws and regulations.

To ensure that all employees are aware of our core values within anti-corruption all new employees need to sign that they have conducted our Code of Business Conduct training, where anti-corruption is one of the topics covered. We reinforce this by regular re-trainings every second year. This year, we had a 90% completion rate on our Code of Business Conduct refresh training.

Being a global company means Transcom needs to be aware of different country-specific risks. We conduct risk assessments on all parts of our business looking at Transparency International's Corruption Perception Index to know where Transcom needs to put extra focus on measures to prevent corruption. Each country's risk register includes the risks of corruption in the respective country through the scope of the internal audit and, when strategically necessary, in risk assessments for business development.

In our efforts to combat corruption, employees, clients, and partners are encouraged to raise concerns they have about potential corruption violations through our whistleblower system, in line with our Whistleblower policy. These policies are described in more detail in the chapter "Our sustainability approach".

During 2020, we did not have any confirmed incidents of corruption.

“ Trust is the ultimate currency. It can't be bought and, once attained, can be lost in an instant. Therefore, every day, we need to ensure that our actions, interactions, activities, and decisions are rooted in a core sense of ethics and responsibility.

*Steffen Bagge,
COO Europe, Transcom,
executive sponsor*



Sustainable supply chain

The majority of our suppliers are within IT and network, temporary staff and recruitment agencies, followed by facility-related suppliers. Two-thirds of our suppliers are situated in Europe and the remainder in North America and the Asia-Pacific region.

Transcom has a clear process to evaluate our new suppliers and take effort to include the Supplier Code of Business Conduct in all significant procurement processes. If a supplier hasn't signed our Code it is because they have an even more comprehensive Code of Business Conduct in place.

By signing the Supplier Code of Business Conduct the supplier as well as their subsidiaries, including employees, agents and subcontractors, need to commit to the provisions in the code. The code is based on the UN Global

Compact's ten principles. If Transcom detects breaches towards the code, corrective measures can be demanded. If the supplier does not commit to the corrective measures, contracts with the supplier may be terminated. However, Transcom always believes that cooperation and dialogue are the best ways to improve our own as well as our suppliers' sustainability performance. Transcom is always open to support our suppliers and safeguard that no breaches towards human rights, labor rights, environmental protection, or corruption emerge in our supply chain.

As noted in the risk assessment chapter (page 11-12), the most prominent risk in our supply chain are social risks with temp agencies/staffing and sub-contractors, why we in 2021 will focus our efforts when it comes to the Supplier Code of Business Conduct on these vendor categories, ensuring that all new vendors have signed the Code.

Topic	Targets 2021-2023
Safeguard non-discriminatory and ethical conduct towards end-customers and clients	100% of employees trained in Code of Business Conduct, at hiring and every 2 years after
Counteract fraud, bribery, and other corrupt practices in customer, client, and supplier interactions	100% of employees trained in anti-corruption as part of the Code of Business Conduct, at hiring and every 2 years after 100% of new temp agencies and sub-contractors signed Supplier Code of Business Conduct

2.6 Security and privacy

Every day, our over 28,000 customer experience specialists handle over 1.5 million interactions with our clients' customers. Ensuring protection of the data and privacy is a big focus for us, and we understand that technology alone is not enough. We need to ensure that safety and security measures go hand in hand with the latest technology and human knowledge.

GDPR

Transcom has a well-established governance structure to ensure compliance with applicable data protection laws, monitored by a steering committee including the Global Data Protection

Officer, Global Head of Legal, Global Chief People Officer, Global Chief Information Security Officer and Global IT Operations. All GDPR related policies are available to all employees via the intranet. All employees located within the EU or handling clients based in the EU undergo mandatory digital GDPR training during the onboarding process, and every second year thereafter.

In 2020, 100% of new employees located within the EU or handling clients based in the EU completed our GDPR training, and the GDPR refresh training had a 96% completion rate among employees with more than two years' tenure.

“ We are trusted to handle our clients' core asset, their customers, and Transcom's biggest asset, our employees. This is a huge responsibility. We need to prove that we earn this trust by safeguarding the integrity and privacy of our employees, clients, and clients' customers' data.

*Stefan Berg,
Chief Technology Officer,
executive sponsor*



Information security

To establish and reinforce the knowledge about security and data protection, all employees handling production or personal data, or supporting the management of them, go through security awareness training within 30 days of hire, and every year thereafter. During 2021, a new mandatory online training is being created and rolled out for all employees to raise the security awareness even further. Our target starting from 2022 is to have all active employees complete this training upon hire and every year thereafter.

We are employing several frameworks to improve our concept of layered security and defense in depth, i.e. the PCI DSS, ISO/IEC 27001:2013, COBIT 5, NIST SP 800-53 R4, NIST CSF

and similar security frameworks. This means that we can reach the control level maturity we consider appropriate for our business environment and risk exposure in a comprehensive way. We continuously follow alerts and event related information from our production IT environment to be able to respond timely to any incident.

In 2020, a mature and solid information security organization became even more important when Covid forced us to rapidly work-at-home enable our traditional brick and mortar operations. Having 15 years' experience in the space and following the framework developed for our COPC certified North American work-from-home operations, we could continue to offer safe and continuous operations despite the pandemic.

“ We are trusted to handle our clients' core asset, their customers, and Transcom's biggest asset, our employees. This is a huge responsibility. We need to prove that we earn this trust by safeguarding the integrity and privacy of our employees, clients, and clients' customers' data.

Meet Andrea Szeiler, named one of the Top 50 European Women in Cyber-security for 2019 by the SC Magazine UK, and Chief Information Security Officer at Transcom.



Compliance

Transcom operates in 22 countries. To ensure that all applicable laws and regulations are followed, our legal team continuously reviews and adopts new legislative requirements from the countries where we provide services for clients. Our efforts when it comes to compliance; external audits, internal

control assessments, and the annual risk assessment process provides assurance that the implemented countermeasures are working appropriately, protecting our and our clients' data.

During 2020, Transcom did not have any substantiated complaints concerning breaches of customer privacy.

Topic	Targets 2021-2023
Ensure customer and client data security and privacy	100% of active employees within the EU and/or working with European clients are GDPR compliant, and equivalent regulations if/where applicable 100% of active employees trained in basic security awareness and behavior upon hire and every year thereafter

2.7 How Transcom supports the Sustainable Development Goals



4 QUALITY EDUCATION



Quality education

4.4 We offer equally available training programs to promote productivity and diversification, supporting the increase of youth and adults with relevant skills.

4.7 Our Code of Business Conduct, signed by all employees, includes information on human rights, labor rights, environmental issues, and anti-corruption, global citizenship and appreciation of cultural diversity.

5 GENDER EQUALITY



Gender equality

5.1 & 5.5 We ensure non-discrimination in employment through e.g. policies, training, anonymized hiring processes and gender-sensitive recruitment. We pay equal remuneration, including benefits, for work of equal value. We ensure equal access to training programs and have a zero-tolerance for any form of discrimination.

7 AFFORDABLE AND CLEAN ENERGY



Affordable and clean energy

7.2 We monitor and report on the amount of energy consumed, according to source.

7.3 We are actively seeking to reduce energy consumption in our own operations through choosing energy-efficient buildings when selecting new office locations.

8 DECENT WORK AND ECONOMIC GROWTH



Decent work and economic growth

8.2 We have implemented appropriate training programs to support technological learning and innovation and address eventual negative impacts on the workforce.

8.7 We have strict and explicit statements on human rights, labor rights, environmental issues and anti-corruption in our Supplier Code of Business Conduct to increase awareness, promote sustainable development and sustainable practices.

10 REDUCED INEQUALITIES



Reduced inequalities

10.2 & 10.3 We always ensure equal respect and support to women and men in our organization and when performing customer service activities. We consider the diversity of language and culture, and have a zero-tolerance policy on any form of discrimination.



Responsible consumption and production

12.5 We promote sustainable consumption and minimizing the use of natural resources through recycling, reuse, and through our procurement processes.



Climate action

13.3 Transcom monitors and reports on the amount of energy consumed, according to source. Awareness on environmental protection is raised through our environmental policy.



Peace, justice and strong institutions

16.3 We develop and implement policies, training, and programs to effectively address customer data protection and security.
16.5 We develop and implement policies, training and programs to effectively address and mitigate all forms of corruption regardless of region or situation. We have a zero tolerance policy on corrupt practices on all levels. Our whistleblower policy applies to Transcom employees, agency workers, contractors, and home agents.

3. Report details

3.1 About the report

Reporting period: January – December 2020

Reporting standard: Global Reporting Initiatives Standards

Publication of previous report: April 2020

Contact in charge of the report: Helene Ruda, Head of Group Communications, helene.ruda@transcom.com

This report has been prepared in accordance with the GRI Standards: Core option, the EU Non-Financial Reporting Directive (Directive 2004/95/EU) and the Swedish Legislative Annual Accounts Act (ÅRL), hence this report acts as Transcom's Statutory Sustainability Report.

Scope and Boundaries

This sustainability report covers the business of Transcom Holding AB. The full list of legal entities can be seen in Transcom Annual Report 2020.

Our employee data is collected from our internal HR systems. The HR data is stated in Headcount and is per the 31st of December 2020. There is a possibility of a 1% discrepancy in the HR data due to different dates of closing the HR-data among the countries.

The HR-data disclosed regarding employment and diversity include both employees and consultants whereas consultants are excluded from data related to salary, remuneration and diversity. Salary and remuneration data have been collected in local currencies and converted through currency exchange rates from Swedish "Riksbanken" and Canadian currency authority "XE". Scope 1 and 2 emissions are calculated based on the Greenhouse Gas Protocol standard and IES. Emission factors used

has been taken from DEFRA and Association of Issuing Bodies (AIB). Scope 3 emissions include business travel and are provided by third party. Emissions for all energy sources being renewable has been manually standard calculated to 0. 2018 is set as the base year for our environmental data.

In comparison to last year Transcom has expanded its operations to include Egypt and Bosnia and Herzegovina. Both countries are included in this year's report.

Our material topics "Reduce and have proper disposal of e-waste", and "Sustainable supply chain", "Safeguard non-discriminatory and ethical conduct towards end-customers and clients" and "Support community engagement" do not have quantifiable data presented in this report. Instead, they are thoroughly described in the management approach disclosure in the sections 2.3 Community Engagement on page 27, 2.4 Environment on page 29, and 2.5 Business ethics on page 32.

External assurance

No independent third-party assurance has been conducted on the GRI-data. However, EY Sweden AB has conducted an assurance in accordance with FAR's auditing standard RevR12.

3.2 Workforce data

GRI	Total number of employees by contract type		
102-08	Europe	Male	Female
	Permanent	3,769	6,459
	Temporary	1,502	3,003
	Consultants	47	56
	Global English Region	Male	Female
	Permanent	5,648	6,774
	Temporary	484	728
	Consultants	4	6
	GRI	Total number of employees by employment type	
102-08	Europe	Male	Female
	Full time	3,423	5,007
	Part time	1,895	4,511
	Global English Region	Male	Female
	Full time	6,017	7,329
	Part time	131	167
GRI	Total employee count		
102-08	Male		11,466
	Female		17,014
	Total		28,480
GRI	Gender distribution of employees		
405-1	Global	Male	Female
	Executive managers	67%	33%
	Managers	58%	42%
	Employees	40%	60%
	Europe	Male	Female
	Managers	58%	42%
	Employees	36%	64%
	Global English Region	Male	Female
	Managers	58%	42%
Employees	45%	55%	

GRI	Age distribution of employees			
405-1	Global	Age <30	Age 30-50	Age >50
	Executive Management	0%	73%	27%
	Managers	19%	71%	10%
	Employees	48%	45%	7%
	Europe			
	Managers	12%	80%	8%
	Employees	38%	52%	10%
	Global English Region			
	Managers	22%	67%	11%
Employees	60%	37%	3%	
GRI	Diversity of the Board			
405-1	Gender	Male	Female	Other
		100%	0%	0%
	Age	Age <30	Age 30-50	Age >50
	0%	50%	50%	
GRI	Executive salary & remuneration – ratio women to men*			
405-2	Global	Basic salary	Remuneration	
	Executive Management		42%	49%
	Managers		89%	99%
	Employees		96%	95%
	Europe			
	Managers		88%	103%
	Employees		97%	97%
	Global English Region			
	Managers		95%	92%
Employees		91%	91%	

Europe includes our operations in Albania, Bosnia Herzegovina, Croatia, Egypt, Estonia, Germany, Hungary, Italy, Latvia, Lithuania, Netherlands, Norway, Poland, Portugal, Serbia, Spain, Sweden, and Tunisia.

Global English Region includes our operations in Canada, Philippines, United Kingdom, and USA.

*The following countries has been excluded from the manager category since they do not have enough representatives of each gender to make an accurate and representative calculation: Albania, Bosnia-Herzegovina, Croatia, Egypt, Estonia, Germany, Hungary, Latvia, Lithuania, Norway, Poland, Portugal, USA. Transvoice has also been excluded for the same reason.

3.3 GRI Content Index

GRI standard	Disclosure	Chapter	Fulfillment	Comments
Organizational profile				
GRI 102: General Disclosures	102-1 Name of the organization	1.1 Transcom at a glance	Fulfilled	
	102-2 Activities, brands, products, and services	1.1 Transcom at a glance	Fulfilled	
	102-3 Location of headquarters	1.1 Transcom at a glance	Fulfilled	
	102-4 Location of operations	1.1 Transcom at a glance	Fulfilled	
	102-5 Ownership and legal form	1.1 Transcom at a glance	Fulfilled	
	102-6 Markets served	1.1 Transcom at a glance	Fulfilled	
	102-7 Scale of the organization	1.1 Transcom at a glance	Fulfilled	
	102-8 Information on employees and other workers	3.2 Workforce data	Fulfilled	
	102-9 Supply chain	2.5 Business ethics	Fulfilled	
	102-10 Significant changes to the organization and its supply chain	2.5 Business ethics, 3.1 About the report	Fulfilled	
	102-11 Precautionary Principle or approach	2.4 Environment	Fulfilled	
	102-12 External initiatives	2.3 Community engagement, 2.7 How Transcom supports the Sustainable Development Goals	Fulfilled	
	102-13 Membership of associations		Fulfilled	Transcom is not active member in any sustainability associations.
Strategy				
	102-14 Statement from senior decision-maker	1.2 CEO comment	Fulfilled	
Ethics and integrity				
	102-16 Values, principles, standards, and norms of behavior	1.4 Our sustainability approach, 1.5 Risk management and governance	Fulfilled	

Governance			
	102-18 Governance structure	1.4 Our sustainability approach	Fulfilled
Stakeholder engagement			
	102-40 List of stakeholder groups	1.6 Stakeholder engagement	Fulfilled
	102-41 Collective bargaining agreements	2.2 Inclusion & diversity	Fulfilled
	102-42 Identifying and selecting stakeholders	1.6 Stakeholder engagement	Fulfilled
	102-43 Approach to stakeholder engagement	1.6 Stakeholder engagement	Fulfilled
	102-44 Key topics and concerns raised	1.6 Stakeholder engagement, 1.5 Transcom focus on what matters most	Fulfilled
Reporting practice			
	102-45 Entities included in the consolidated financial statements	1.1 Transcom at a glance	Fulfilled
	102-46 Defining report content and topic Boundaries	1.6 Stakeholder engagement, 1.5 Transcom focus on what matters most	Fulfilled
	102-47 List of material topics	1.6 Stakeholder engagement, 1.5 Transcom focus on what matters most	Fulfilled
	102-48 Restatements of information	3.1 About the report	Fulfilled
	102-49 Changes in reporting	3.1 About the report	Fulfilled
	102-50 Reporting period	3.1 About the report	Fulfilled
	102-51 Date of most recent report	3.1 About the report	Fulfilled
	102-52 Reporting cycle	3.1 About the report	Fulfilled
	102-53 Contact point for questions regarding the report	3.1 About the report	Fulfilled
	102-54 Claims of reporting in accordance with the GRI Standards	3.1 About the report	Fulfilled
	102-55 GRI content index	3.2 GRI content index	Fulfilled
	102-56 External assurance	3.1 About the report	Fulfilled
Material topics			
GRI 200 Economic Standard Series			
Counteract fraud, bribery, and other corrupt practices in customer, client, and supplier interactions			
GRI 103: Management approach (2016)	103-1 Explanation of the material topic and its Boundary	2.5 Business ethics	Fulfilled
	103-2 The management approach and its components	2.5 Business ethics	Fulfilled
	103-3 Evaluation of the management approach	2.5 Business ethics	Fulfilled
GRI 205: Anti-corruption (2016)	205-1 Operations assessed for risks related to corruption	1.6 Risk management, 2.5 Business ethics	Fulfilled
	205-3 Confirmed incidents of corruption and actions taken	2.5 Business ethics	Fulfilled

GRI 300 Environmental standards

Reduce energy consumption and greenhouse gas emissions in own operations

GRI 103: Management approach (2016)	103-1 Explanation of the material topic and its Boundary	2.4 Environment	Fulfilled
	103-2 The management approach and its components	2.4 Environment	Fulfilled
	103-3 Evaluation of the management approach	2.4 Environment	Fulfilled
GRI 302: Energy (2016)	302-1 Energy consumption within the organization	2.4 Environment	Fulfilled
	302-3 Energy intensity	2.4 Environment	Fulfilled
GRI 305: Emissions (2016)	305-1 Direct (Scope 1) GHG emissions	2.4 Environment	Fulfilled
	305-2 Energy indirect (Scope 2) GHG emissions	2.4 Environment	Fulfilled
	305-3 Other indirect (Scope 3) GHG emissions	2.4 Environment	Fulfilled

Reduce and have proper disposal of e-waste

GRI 103: Management approach (2016)	103-1 Explanation of the material topic and its Boundary	2.4 Environment	Fulfilled
	103-2 The management approach and its components	2.4 Environment	Fulfilled
	103-3 Evaluation of the management approach	2.4 Environment	Fulfilled

GRI 400 Social Standards

Attract and retain a talented and engaged workforce

Health and wellbeing at work

Training and development

GRI 103: Management approach	103-1 Explanation of the material topic and its Boundary	2.1 People development	Fulfilled
	103-2 The management approach and its components	2.1 People development	Fulfilled
	103-3 Evaluation of the management approach	2.1 People development	Fulfilled
GRI 404: Training and education (2016)	404-2 Programs for upgrading employee skills and transition assistance programs	2.1 People development	Fulfilled

Ensure equal opportunities and diversity among employees and management

GRI 103: Management approach	103-1 Explanation of the material topic and its Boundary	2.2 Inclusion & diversity	Fulfilled
	103-2 The management approach and its components	2.2 Inclusion & diversity	Fulfilled
	103-3 Evaluation of the management approach	2.2 Inclusion & diversity	Fulfilled

GRI 405: Diversity and equal opportunity (2016)	405-1 Diversity of governance bodies and employees	2.2 Inclusion & diversity	Partial	Excluding information divided per region because of significant currency variance and respect for personal integrity
	405-2 Ratio of basic salary and remuneration of women to men	2.2 Inclusion & diversity	Fulfilled	
Ensure customer and client data security and privacy				
GRI 103: Management approach	103-1 Explanation of the material topic and its Boundary	2.6 Security and privacy	Fulfilled	
	103-2 The management approach and its components	2.6 Security and privacy	Fulfilled	
	103-3 Evaluation of the management approach	2.6 Security and privacy	Fulfilled	
GRI 418: Customer privacy (2016)	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	2.6 Security and privacy	Fulfilled	
Sustainable supply chain				
GRI 103: Management approach	103-1 Explanation of the material topic and its Boundary	2.5 Business ethics	Fulfilled	
	103-2 The management approach and its components	2.5 Business ethics	Fulfilled	
	103-3 Evaluation of the management approach	2.5 Business ethics	Fulfilled	
Support community engagement				
GRI 103: Management approach	103-1 Explanation of the material topic and its Boundary	2.3 Community engagement	Fulfilled	
	103-2 The management approach and its components	2.3 Community engagement	Fulfilled	
	103-3 Evaluation of the management approach	2.3 Community engagement	Fulfilled	
Safeguard non-discriminatory and ethical conduct towards end-customers and clients				
GRI 103: Management approach	103-1 Explanation of the material topic and its Boundary	1.5 Risk management & governance, 2.5 Business ethics	Fulfilled	
	103-2 The management approach and its components	1.5 Risk management & governance, 2.5 Business ethics	Fulfilled	
	103-3 Evaluation of the management approach	2.5 Business ethics	Fulfilled	

Stockholm

The Board of Directors in Transcom Holding AB (publ)

Fredrik Cappelen
Chairman of the Board

Klas Johansson
Member of the Board

Mattias Holmström
Member of the Board

Alfred von Platen
Member of the Board

Eivind Roald
Member of the Board

Brent J. Welch
Member of the Board

Jonas Dahlberg
President & CEO

Our auditors' report was submitted on the date as evidenced by our electronic signature

Ernst & Young AB
Johan Holmberg

4. Auditor's report on the statutory sustainability statement

To the general meeting of the shareholders in Transcom Holding AB, corporate identity number 556962-4108

Engagement and responsibility

It is the board of directors who is responsible for the corporate governance statement for the year 2020 and that it has been prepared in accordance with the Annual Accounts Act.

The scope of the audit

Our examination has been conducted in accordance with FAR's auditing standard RevU 16 The auditor's opinion regarding the statutory

sustainability statement. This means that our examination of the sustainability statement is different and substantially less in scope than an audit conducted in accordance with International Standards on Auditing and generally accepted auditing standards in Sweden. We believe that the examination has provided us with sufficient basis for our opinions.

Opinions

A statutory sustainability statement has been prepared.

Stockholm the day as evidenced by our electronic signature

Ernst & Young AB

Johan Holmberg

Sustainability Report

2020

