

# Teleplan Sustainability Report 2018

## UN Global Compact Communication of Progress

### *Driving Circularity into Supply Chain Solutions*

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#### 1. CEO Message

*We are accelerating the transition to a circular economy. Through various pilot projects and trials we are working together with key industry stakeholders understanding that Circular Economy is restorative and regenerative by design.*

*In 2018 we have made great progress in developing and enabling circularity by re-using parts and limited raw materials and rare metals for new products. Two major pilot programs for Google and Dell Technologies have been accomplished: a new closed-loop process to recover the rare earth magnets from recovered enterprise equipment. The harvested magnets have been reformed for reuse in new hard-disk drives. In the initial pilot program, Dell Technologies are using the reformed magnets in Seagate hard drives for their Latitude 5000 series laptop that began shipping in May 2019.*

*Plastics are fundamental to our everyday life. Yet they are one of the most wasteful examples of our existing linear, take-make-dispose economy. With 8 million tonnes of plastic entering the ocean each year, we urgently need to rethink the way we make, use, and reuse plastics.*

*In partnership with a leading international industrial company involved in the manufacturing and sale of machines and films for food packaging, a first trial of replacing plastic shrink wrap with compostable material to wrap pallets has been concluded. Based on the positive outcome of the trial we are piloting this alternative packaging material with a selected number of existing customers in Europe.*

*Anticipating the European ban on single-use plastics, Teleplan has started to eliminate single-use plastics in our European service center locations. Together with some of our European client base we*

are looking into the elimination of single-use plastics in their supply chains which impact inbound and outbound processes at our service centers starting with packaging material. We have identified alternative packaging and wrapping solutions and have implemented these in our operations.

Our engagement with the charity Lessons for Life in support of their education projects has had a positive impact on a number of children. Teleplan contributed to the funding of the school education programme implemented by Child Aid Uganda (CAU) in Lyantonde, Uganda by supporting the payment of school fees, scholastic materials (stationery) and living costs. Teleplan's donations have mainly been used for school fees and hygiene packs for girls. Additional fund raising activities were initiated such as our participation in the Big Ride for Africa, and the annual gala dinner in London which is a highlight of Lessons for Life annual activity calendar. A large number of Teleplan employees have sponsored these activities through their individual contributions.

We continually strive to improve the environmental impact of our own operations. Our focus in the coming year will be on energy consumption and GHG emissions. Teleplan's Scope 1 and 2 GHG emissions reduction strategy will be developed and short-, mid-, and longer term carbon emissions reduction targets will be set, measured and verified by an external third party verification company. Our primary aim is to help drive de-carbonization through our reverse supply chain business.

We are fully committed to the 2015 Paris Climate Agreement's target to limit global warming to well below 2°C and we understand that reaching this goal will require a full de-carbonization of the global economy.

François Lacombe

Chief Executive Officer

## 2. About Us

As of 31<sup>st</sup> December, 2018:

|                  |              |
|------------------|--------------|
| Revenue 2018     | 236 Mio euro |
| No. of Employees | 4.435        |
| Indirect labour  | 3.911        |
| Direct labour    | 524          |

Teleplan plays a vital role in mitigating the social and environmental impacts of the global consumer electronics industry. Circularity and sustainability are at the core of the business in the development and provision of services which keep products in use for as long as possible and maximise the value of parts and materials at end of life. The company's expertise is in extending the lifecycle of electronic devices through the provision of a range of innovative services:

- Customer Care
- Reverse Logistics
- Parts Management
- Screening & Testing
- Repair & Refurbishment
- Resell & Recycle

Our supply chain solutions are supporting:

- Manufacturers
- Telecommunication and Television Operators
- Insurance Companies
- Retailers and online shopping platforms

- Resellers

#### **Our networks:**

We are an active member of the

CE 100 Network (since 2016)

United Nations Global Compact (since 2015)

European Remanufacturing Council (since 2019)

### **3. Managing Sustainability**

Teleplan's commitment to sustainability is underpinned by the management of the ethical, social and environmental impacts of our business. Principally these are:

- innovation of services and solutions to extend product life and maximise recovered value
- meeting the highest ethical standards in the conduct of the business
- creation of an equal opportunity, diverse and inclusive workplace in which employees are treated fairly and with respect and have the opportunity to develop and prosper
- ensuring the health, safety and well being of employees and facilities
- the efficient use of energy
- the responsible management of waste
- championing and supporting good causes relevant to the business locally and globally

Teleplan manages these impacts through systems and procedures which are integral to our operations. Our social and environmental management system is consistent with the requirements of Responsible Business Alliance (RBA) and in alignment with environment and health and safety standards ISO 14001:2015 and OHSAS 18001. The company maintains certification to these internationally recognized standards and is also assessing the certification requirements of new standards such as ISO 27001 for information security.

Teleplan maintained its EcoVadis gold rating for the third year in a row in 2018 with a score of 70%. This reflects a comprehensive and ongoing social and environmental improvement program and places Teleplan in the top 5% of organizations assessed by EcoVadis.

We participate as a signatory to the United Nations Global Compact (UNGC) and align our sustainability efforts to the Sustainable Development Goals (SDGs) as shown below:

SDG 9: Think of innovative new ways to repurpose old material

SDG 12 Recycle paper, plastic, glass and aluminium

SDG 13: Climate action to combat climate change and its impact

SDG 14: Avoid plastic bags to keep the oceans safe and clean

SDG 17: Partnerships to achieve SDG achievements

We will make reference to those goals where applicable in other sections of this report.

Under the pledge of UNGC signatory companies to do business responsibly we follow the ten UNGC principles in the areas of human rights, labor, the environment, anti-corruption and sustainable business practices and report on our progress in our annual Communication of Progress which is published on the UNGC website.

## **4. People**

### **Creation of an equal opportunity, diverse and inclusive workplace**

Teleplan employs 4,435 people across multiple service centers and geographies. The recruitment, employment, training and development, health, safety and well-being of these employees are integral to the prosperity and success of the business.

Teleplan is committed to developing and maintaining a workplace and working environment in which employees are treated fairly and with respect and have the opportunity to develop and prosper.

Teleplan has established management systems which ensure that the business:

- Complies with all non-discrimination requirements and provides equal opportunities in employment at every level.
- Maintains an environment which promotes inclusion and diversity where individuals are free from any physical, sexual, psychological, verbal or visual harassment or abuse
- Observes all applicable restrictions on the maximum hours employees are legally permitted to work
- Pays employees at least the minimum wage required by local law and provides all legally mandated benefits
- Upholds the right to freely chosen employment and does not use forced, indentured or bonded labor
- Requires a minimum age requirement for employment consistent with local law
- Upholds the right to freedom of association and the right to engage in collective bargaining in accordance with applicable laws and regulations

These policies and procedures apply equally to permanent and temporary contract employees.

Employee training and development programs are developed and managed by the service center management working with the locally based human resources specialists thus facilitating learning which is tailored to local employee and business requirements.

### **Ethical Conduct of the business**

#### **Teleplan Code of Conduct**

The Teleplan Code of Conduct prescribes the important legal and ethical principles that all Teleplan employees, managers and directors must observe in conducting the company's business. It provides

a standing guide for handling business situations and determining key business decisions and actions in an honest, ethical and professional manner.

Teleplan's Code of Conduct is published on the corporate website and communicated to employees when they join the Company. It is translated into the seven principal languages used across the company and includes information on how to raise concerns, issues or suspected violations of the Code. Employees confirm their understanding of the Code and compliance to it through a written sign-off process.

Teleplan has an established whistle blowing policy and procedure which ensures that any individual can report in confidence and without fear of reprisal, actual or alleged breaches of the Teleplan Code of Conduct. Reports are managed by the General Counsel. There were no unresolved issues in 2018.

## **Health and Safety of employees and facilities**

### **Health and safety performance**

Teleplan began collecting health and safety data in 2014.

In 2018 the number of recordable incidents was 31 (2017:59). The absolute number of days lost as a result of these incidents was 782 (2017:458). The incident rate (as defined by OSHA) was 0.73 (2017:1.2).

The Severity Rate was 25 days (2017:8 days). This means that for every recordable incident in 2018 an average of 25 days was lost due to work related injuries and illnesses.

## **5. Environment**

### **Helping to shape low carbon future economy**

We continually strive to improve the environmental impact of our operations.

#### **Carbon Disclosure Project (CDP)**

We continue to support the Carbon Disclosure Project (CDP) as a responding company. Since 2016 we have completed, submitted and made publicly available on the CDP online platform our annual response to the Supply Chain Climate Change questionnaire and audit. In 2018 we achieved a "D" scoring reflecting our company's level of environmental stewardship, and our actions and approaches in managing climate change.

We have established a number of local initiatives to manage CO2 emissions from our operations through:

- Sourcing green or renewable energy
- Introduction of LED lighting
- Introduction of sensor light switches in restrooms
- Improving insulation of heating and cooling piping, valves and pumps
- Continuing local employee engagement campaigns to promote, educate, and incentivise employees to conserve energy.

To date our approach to reducing CO2 emissions resulting from our own operations has been to focus on the efficient use of space and judicious consumption of energy. Our supplier base is

principally determined by our customers and consequently we have limited influence on our suppliers' impacts on climate change.

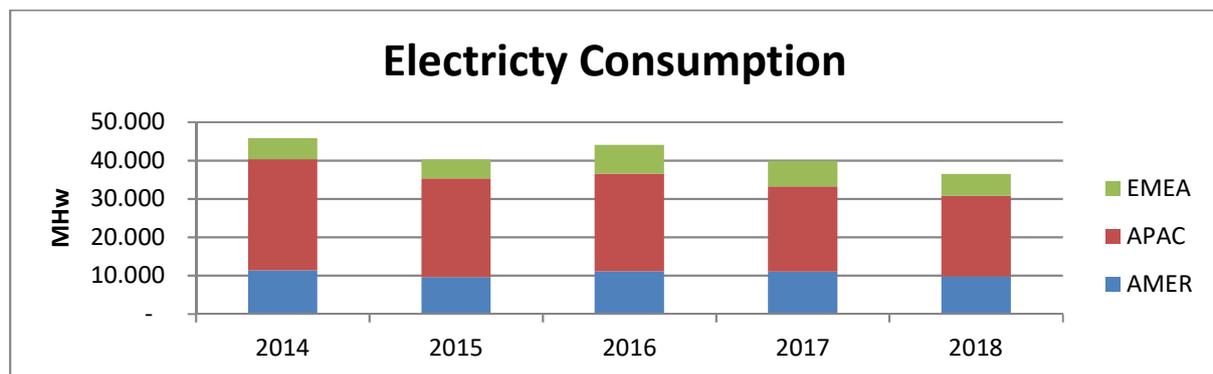
In April this year we engaged the Carbon Trust to work with us on the development and implementation of smart, measurable and verifiable carbon emissions reduction targets for the short term (2019) and mid-term (5 years) These targets will be published on our website in the second half of 2019 and our progress to achieving them will be audited and verified by a third party on an annual basis.

### Energy efficiency of our operations

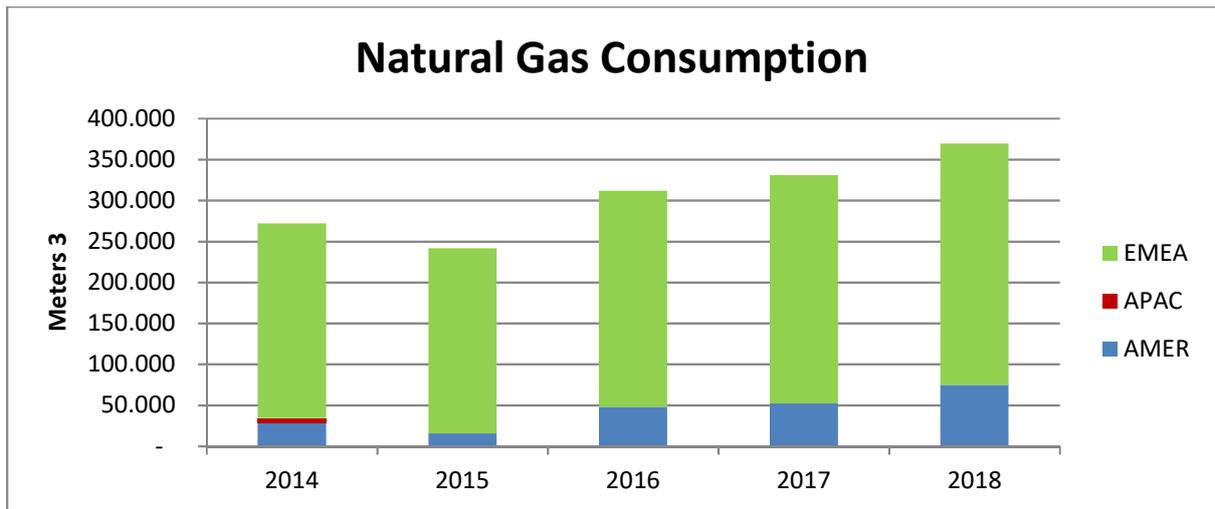
Teleplan began collecting energy consumption data from our service centers in 2014.

We are working to reduce the carbon intensity of the electricity we use by sourcing electricity from renewable sources where it is available and economic, principally in Europe.

The decrease in electricity consumption in 2018 is the result of consolidating our footprint and reducing our square footage in Teleplan service centers as space and facilities are used more efficiently and effectively. Levels of energy consumption are also impacted by the type of activity undertaken and this varies in line with customer service programs and their specific requirements.



The overall trend in the period 2014 to 2018, is a decrease in the consumption of electricity. Electricity consumption decreased by 8.5% in 2018 to 36,498 MW/h (2017:39,907 MW/h).



The consumption of natural gas which is used in a small number of service centers in Europe and North America for heating increased by 11.7% to 369,521 m<sup>3</sup> (2017: 330,946 m<sup>3</sup>), in part as a result of severe winter weather conditions.

#### **Waste management to international standards**

Teleplan has a vital role in mitigating the environmental impacts of electronic devices through the provision of repair and refurbishment services. When a repair cannot be made, the recovery, reuse, recycling or safe disposal of components and materials is integral to Teleplan’s customer proposition. Teleplan has well established programs to recover, reuse and recycle electronic waste at all its service centers. Other types of waste handled include cardboard and paper, metals and plastics, hazardous spare parts and substances such as batteries and florescent bulbs all of which are managed through recycling programs together with a network of recycling partners.

We work to internationally recognised standards and certifications in relation to electronic and hazardous waste.

## **6. Communities**

### **Championing and supporting good causes locally and globally**

In 2018 we started to support Lessons for Life, a children’s charity that funds educational projects in Africa. The charity’s ethos is that education changes everything and that every child, no matter where they are born, has the right to a quality education that equips them for life. Our monetary contribution is assigned to Child Aid in Uganda and directly supports children to attend and stay in school and benefit from school and classroom improvements.

CEO Francois Lacombe participated in the Big Ride for Africa, one of Lessons for Life’s biggest events, and Teleplan employees raised in excess of 4.600 euro. Teleplan corporate matching generated an additional 1800 euro.

#### **Big Ride for Africa – François Lacombe:**

“It is my passion to exercise, so I never need a reason to run or ride. With my participation in the Big Ride for Africa in Ireland I found out that doing it for a cause, Lessons for Life, which helps children across Africa have access to education, is much more rewarding.”

In recognition of Teleplan employees' enthusiastic involvement both individually and together in fundraising activities and volunteering initiatives in support of the good causes important to them and to the community in which they work, Teleplan operates a matched funding program which reinforces the company's commitment to living its values and reaching out beyond its usual business boundaries.

#### **Examples of local fundraising and donation activities:**

- Our Harrisburg team in the US participated in the Annual Big Brothers/Big Sisters Bowl for Kid's Sake campaign and raised \$2,400.
- Our Mexican based teams donated to an educational institute.

## **7. Innovation**

### **Extending product life through refurbishment**

Innovation is at the core of Teleplan's focus on extending product lifecycle. The continuous development of testers and solutions are supporting the reuse of old/used electronic devices. Certified data erasure is key in this process to guarantee data security and data privacy. This promotes consumer confidence in buying good quality second hand products.

The high quality, objective, flexible, repeatable, full functional testing enables the diagnosis of a fault and the correct disposition decision in respect of repair, refurbishment, same unit return, swap, resell or recycle.

Early in 2019 Teleplan unveiled its next generation of Optiline, an objective grading tester, which determines the physical and optical condition of any mobile phone or set-top box surface. A criteria which is key to determine the success of any resell partner in the value chain.

It is forecast that the used and refurbished mobile phone market will continue to grow at a year-on-year rate of 10% to 2022. By 2022 it is estimated that the value of the used smartphone market will be in the region of \$52.7 billion.

The production of new products continues to be linear. However Teleplan is supporting a closed loop supply chain where new products are made using recycled or renewable materials. In a revolutionary and ground breaking development rare metals have successfully been recovered from hard disc drives. Since Teleplan processes over 65% of the worldwide returns of Hard Disc Drives (HDD) for Western Digital, Seagate, Toshiba and HGST this accomplishment has a significant impact on the opportunities for extending product life and value recovery in this niche segment.

### **Mining less from earth and more from old devices**

**Case:** (published in GreenBiz in April 2019)

"One very specific, pragmatic program to watch is an initiative Dell developed in collaboration with hard-drive and information storage equipment manufacturers Seagate and Teleplan, which manage repair and maintenance services for technology.

Seagate and Teleplan together have created a process to recover rare earth-element magnets from old enterprise IT equipment that has reached its end-of-life — in the eyes of the original owners, at least. Starting in May 2019, those re-born magnets will be used in hard drives for the Dell Latitude 5000 notebook series. The goal is to produce about 25,000 drives initially, but Dell figures that its

take-back programs could quickly help Seagate manufacture roughly 300,000 of them on an annual basis. “

## **8. Supply Chain**

### **Accelerate the transition to a circular economy**

The Circular Economy 100 network is a global platform bringing together leading companies, emerging innovators and regions to accelerate the transition to a circular economy. A circular economy is an economic model in which resources are kept in use for as long as possible, the maximum value is extracted from them whilst in use, and products and materials are recovered and regenerated at the end of life.

Teleplan is an active member of the CE 100 network and is supporting a number of co-projects with other member companies. Teleplan joined CE 100 in 2016 and is still the only member company which operates in after-market services.

“By 2050, the plastic in our oceans could weigh more than all the fish.” (Source: EllenMacArthur Foundation”).

40% of all plastic in Europe is only used once. This is what is referred to as single-use plastic (SUP), created by the throw away culture that many of us live in. In January 2019, China enforced a ban on the import of plastic waste for recycling. In March 2019 the European Parliament approved a law to ban the use of a wide-range of single-use plastic items, such as straws, cotton buds and cutlery, by 2021.

We have started to eliminate SUP in our own supply chain and also in the supply chain of our European customer base by replacing plastic packaging material. This has resulted in a reduction of 30% of the total volume of plastic bags used.

#### **Case:**

#### **Replacement of plastic shrink wrap for pallets by compostable wrap**

Teleplan has engaged with the Italian based company Fabbri Gruppo and concluded a successful trial in which traditional plastic shrink wrap for pallets was replaced by Fabbri's compostable wrap for industrial purposes. The results were sufficiently promising for Fabbri to plan to start industrial production in the fourth quarter of 2019. The biopolymer used to make the film has been developed in collaboration with BASF. BASF is also a CE100 member and this is an excellent example of the results being achieved through collaboration, consultancy and advisory roles within the network. Going forward Teleplan will introduce compostable pallet wrap to an increasing customer base with a target of eliminating this particular single-use plastic from the supply chain.

#### **Shifting away from single-use plastics in our own operations**

#### **Examples:**

- Single-use plastics have been eliminated in our gastronomy in Prague, Czech Republic
- Multi waste containers are replacing general waste bins
- Prague service center achieved zero-waste to landfill certification in 2018

#### **Ethical supply chain**

Teleplan expects its major local and regional suppliers to be aligned with and meet the social, environmental and ethical standards of the RBA Code of Conduct. This is the standard to which the company works and which has been adopted by many of its customers.

Teleplan provides its customers with service solutions which range from simple repairs to highly sophisticated technological and electronic solutions. The units and components required to undertake these service solutions are purchased primarily from the Original Equipment Manufacturer (OEM) or from a supplier designated by the OEM. In these instances, which are the bulk of Teleplan's activity, Teleplan does not determine the supplier or source of the component. In other instances Teleplan purchases industry standard parts. Teleplan does not subcontract the manufacturing of any units or components.

Whilst a material part of the supply chain is determined by the customer, Teleplan recognises the importance of its role in driving ethical practices in the supply chain.

## 9. Teleplan's CSR journey and achievements

|  |  |   |  |   |   |  |  |
|--|--|---|--|---|---|--|--|
| 2013 CSR charter defined and published, EICC Code of Conduct adopted | 2014 CSR KPIs agreed and reported                          | 2014 Teleplan Code of Conduct translated into 7 languages                                       | 2014 EcoVadis Bronze rating                                  | 2014 EICC Labor and Ethics Lead Auditors trained and qualified          | 2014 First annual CSR report published                          | 2015 EcoVadis Silver rating                    | 2015 Participate in CDP (Carbon Disclosure Project) Supply Chain                                     |
| 2015 Signatory to UN Global Compact                                  | 2016 Join Circular Economy 100 Network                     | 2016 EcoVadis Gold rating   | 2016 UN Global Compact report published                      | 2016 Circular Economy customer experience center opened                 | 2016 Circular Economy White Paper published                     | 2016 Circular Economy Product Passport piloted | 2016 Authorised Treatment Facility (AATF) achieved at UK service center for the treatment of e-waste |
| 2017 Ecovadis Gold rating  | 2017 CE 100 network 3D printing of parts project led by HP | 2017 Kicked off process of eliminating single use plastics in Teleplan's supply chain ecosystem | 2017 Teleplan awarded Cisco Sustainability Award             | 2017 R2 electronics recycling standard achieved at four service centers | 2017 Matched funding for employee charity fund raising launched | 2017 UN Global Compact report published        | 2017 94% of Teleplan and customer-owned materials, parts and equipment recycled                      |
| 2018 EcoVadis Gold rating  | 2018 Partnership with charity Lessons for Life             | 2018 Prague Service center Zero Waste to Landfill certified                                     | 2018 Starting to eliminate single use plastics in operations |   |   |  |  |

## 10. Sustainability Performance Data

### Our targets and achievements

| Objective  | Achievement 2018  | Target 2019   | Target 2020   |
|--|---|---|---|
| <b><i>Innovation of circular services and solutions to extend product life</i></b>                           |   |   |   |
| Teleplan to be a leader and driver in the transformation to a circular economy, providing circular solutions | <ul style="list-style-type: none"> <li>Advised and supported key customers on their CE journey</li> <li>Contributed to a two phase academic research with iNEMI</li> <li>Collaborated with leading data storage manufacturers and users on harvesting and re-using rare metal parts for new products</li> </ul> | Develop and implement circular solutions tailored to specific technologies and customer requirements  | Develop and implement circular solutions tailored to specific technologies and customer requirements                      |
| Teleplan to demonstrate its commitment to circular economy through its own practices                         | Approx. 50% of new eligible employees have been equipped with refurbished rather than new mobile devices  | Continue program to equip new Teleplan employees with refurbished devices and replace outdated phones of existing employees with refurbished mobile phones sourced from one of Teleplan's mobile centers of excellence        | Establish a program to equip <b>all</b> Teleplan employees with refurbished mobile devices when a replacement is required |
| <b><i>Energy and Greenhouse Gas (GHG) emissions</i></b>  |   |   |   |
| Manage use of energy efficiently   | Energy consumption decreased as a result of local energy reduction programs   | Work with the Carbon Trust to develop and implement smart, measurable and verifiable carbon emissions reduction targets for the short term (2019) and mid-term (5 years)<br><br>Publish targets on the Teleplan website in H2 | Achieve the 2019 carbon reduction targets and third party verification  |
| Reduce CO2 emissions   | Sourcing of alternative energy at various service centers in Europe and APAC  |   |   |
| <b><i>Management of waste and recycling</i></b>  |   |   |   |
|  |   |   |   |

|  |   |   |   |
|--|---|---|---|
| Optimise the recovery, reuse and recycling of operational and customer waste | 80% of Teleplan and customer-owned materials, parts and equipment recycled  | Standardize downstream waste processes at service center level as a key milestone in the development and implementation of the Zero Waste to Landfill program | Zero Waste to Landfill program implemented at major service centers |
| <b>Engagement with the community</b>   |   |   |   |
| Facilitate employee charity fund raising and volunteering                    | Undertaken a successful partnership with charity Lessons for Life<br><br>Fundraising activities enhanced by matched funding program | Continue to promote matched funding to encourage employee fund raising activities   |   |

### Teleplan Service Centers ISO Certifications and Recycling Standards and Licenses

| Site               | Square meterage | ISO 9001 | ISO 14001 | OHSAS 18001 | Recycling standards/licenses |
|--------------------|-----------------|----------|-----------|-------------|------------------------------|
| Bydgoszcz          | 10,264          | ✓        | ✓         | ✓           | x                            |
| Prague             | 13,200          | ✓        | ✓         | ✓           | x                            |
| Zoetermeer         | 15,713          | ✓        | ✓         | ✓           | WEEELABEX                    |
| Tallinn            | 916             | ✓        | x         | x           | x                            |
| Genk               | 1,250           | x        | x         | x           | x                            |
| Mexicali           | 23,227          | ✓        | ✓         | ✓           | R2                           |
| Roseville          | 39,874          | ✓        | ✓         | ✓           | R2                           |
| Dallas             | 6,596           | ✓        | ✓         | ✓           | R2                           |
| Reynosa*           | 13,178          | ✓        | ✓         | ✓           | R2                           |
| Harrisburg         | 10,405          | ✓        | x         | x           | x                            |
| Puerto Rico (2018) | 300             | x        | x         | x           | x                            |
| Chile (2018)       | 1,100           | x        | x         | x           | x                            |
| Penang             | 13,200          | ✓        | ✓         | ✓           | R2                           |
| Hong Kong          | 3,172           | ✓        | x         | x           | x                            |
| Singapore          | 1,552           | ✓        | ✓         | x           | x                            |
| Suzhou             | 5,880           | ✓        | ✓         | ✓           | x                            |
| Jakarta            | 455             | ✓        | x         | x           | x                            |

\*Reynosa achieved ISO14001, OHSAS 18001 and R2 in February 2019.

## 11. UN Global Compact Statement of Continued Support

Period covered by COP: January to December 2018

Statement of continued support from François Lacombe, CEO at Teleplan

I am pleased to confirm that Teleplan reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to sharing this information with our stakeholders by publishing this communication on our website.

The table below summarises our actions and provides a reference for further information.

Francois Lacombe  
CEO Teleplan

8th November 2019

## 12. Index of UNGC Principles supported in financial year 2018

| Principle   | Action   | Further information/reference  |
|---|--|--|
| <b>Human Rights</b>   |  |  |
| Principle 1<br>Businesses should support and respect the protection of internationally proclaimed human rights; and   | The Teleplan Code of Conduct is published on the Teleplan website and is integral to the new employee onboarding process.  | Pages 4, 5 of this report<br><br>eleplan Code of Conduct:<br><br><a href="https://www.teleplan.com/manage/wp-content/uploads/1906_Teleplan_CoC.pdf">https://www.teleplan.com/manage/wp-content/uploads/1906_Teleplan_CoC.pdf</a> |
| Principle 2<br>make sure that they are not complicit in human rights abuses.  | Teleplan works to the social, environmental and ethical standards of the RBA Code of Conduct. This is the standard adopted by many of its customers. Teleplan expects its major suppliers to be aligned with and meet the RBA Code of Conduct.   | Page 3 of this report  |
| <b>Labor</b>  |  |  |
| Principle 3<br>Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;<br><br>Principle 4<br>the elimination of all forms of forced and compulsory labour; | The Teleplan Code of Conduct sets the company labor standards. It is translated into the seven principal languages used across Teleplan's operations. Awareness and understanding of the Code and its importance to the business are promoted through a program of employee training and communications and form an integral part of the | Page 5 of this report  |

|  |  |  |
|--|--|--|
| <p>Principle 5</p> <p>the effective abolition of child labour; and</p> <p>Principle 6</p> <p>the elimination of discrimination in respect of employment and occupation</p>                                       | <p>induction of new employees.</p> <p>Teleplan has an established whistle blowing policy and procedure.</p> <p>Three members of the Quality Management team are trained and qualified as RBA Labor and Ethics Lead Auditors and lead a program of assessment and audit to the RBA Code.</p>  |  |
| <p><b>Environment</b></p>  |  |  |
| <p>Principle 7</p> <p>Businesses should support a precautionary approach to environmental challenges;</p>  | <p>Teleplan plays a vital role in mitigating the environmental impacts of electronic devices through the provision of repair and refurbishment services and the recovery, reuse, recycling or safe disposal of components and materials.</p> <p>Teleplan enables its customers to manage faulty, damaged and end-of-life products thereby prolonging the life of the product, supporting circularity and reducing e-waste.</p>   | <p>Pages 8,9 and 10 of this report</p> <p><a href="#">Teleplan website</a></p>   |
| <p>Principle 8</p> <p>undertake initiatives to promote greater environmental responsibility; and</p> <p>Principle 9</p> <p>encourage the development and diffusion of environmentally friendly technologies.</p> | <p>Teleplan, is a member of the Circular Economy 100 (CE100) network. CE100 is a global platform bringing together leading companies, emerging innovators and regions to accelerate the transition to a circular economy.</p> <p>Teleplan has been involved in a number of relevant co-projects together with leading electronic brands with industry breaking results being covered in the international media landscape and fully supporting circularity of rare earth materials and metals.</p> | <p>Pages 8 “Case”and 9 of this report;</p> <p>Press Clipping:</p> <p><a href="https://www.greenbiz.com/article/dells-discovery-closed-loops-require-open-mind">https://www.greenbiz.com/article/dells-discovery-closed-loops-require-open-mind</a></p> |
| <p><b>Anti-Corruption</b></p>  |  |  |

|   |  |   |
|---|--|---|
| <p>Principle 10</p> <p>Businesses should work against corruption in all its forms, including extortion and bribery.</p> | <p>The Teleplan Code of Conduct prescribes the legal and ethical principles that all Teleplan’s employees, officers and directors must observe in conducting Teleplan’s business.</p> <p>Teleplan has set the Responsible Business Alliance (RBA) Code of Conduct as the standard it works to and has appropriately trained people to lead the process of assessment and audit to the RBA Code.</p> <p>Teleplan participates in the social and environmental assessment survey operated by EcoVadis, the leading organization in this field.</p> <p>Since 2016 Teleplan is a responding Company to the Carbon Disclosure Project (CDP) and have completed, submitted and made publicly available on the CDP online platform Teleplan’s annual response to the Supply Chain Climate Change questionnaire and audit.</p> | <p>Pages 3, 4, 5 of this report</p> <p>Teleplan Code of Conduct:</p> <p><a href="https://www.teleplan.com/manage/wp-content/uploads/1906_Teleplan_CoC.pdf">https://www.teleplan.com/manage/wp-content/uploads/1906_Teleplan_CoC.pdf</a></p> |
|---|--|---|