

A sustainable approach to achieving our goals

Corporate Responsibility at Transcom means:

- Taking a sustainable and ethical approach to carrying out our company's mission to provide high-quality service to our clients and customers.
- Creating honest, safe and comfortable working environments where Transcom people can develop their careers and enjoy their working lives.
- Encouraging our people's goodwill, energy and enthusiasm to put Transcom's 5 Corporate Values into action by participating in community-based and international charitable and voluntary activities.
- Proactively sharing our policies and guidelines on ethical business conduct with employees and supplier partners.

Transcom and the United Nations Global Compact

In 2011, we continued our commitment to the Ten Principles of the United Nations Global Compact, which covers aspects of corporate conduct related to Human Rights, Labor Conditions, Environment, and Anti-corruption.

Further details on the Ten Principles can be viewed online at www.unglobalcompact.org.

We are proud and happy to continue our support of the UN Global Compact and we will ensure that its basic principles of good corporate behavior are followed in our operations across the world.

Corporate Responsibility Codes, Guidelines and Policies

A clear message on Responsible Business Conduct:

Transcom's Corporate Responsibility codes, guidelines and policies place ethically responsible conduct at the heart of our organization's culture.

Code of Business Conduct for Employees

The Code of Business Conduct (CBC) for Employees explains our expectations of employee behavior on a range of issues

relating to compliance with the law, respect and equality in the workplace, and ethical questions such as bribery, fraud and conflicts of interest. It is received and validated by every member of our organization. The CBC also gives guidance to employees on the communication channels available for reporting concerns on ethical issues, which include our designated CBC email address.

Reinforcing Ethical Awareness

More than 2,600 Transcom managers from Supervisor-level to the Executive team completed our CBC Awareness Refresh Program during Q311.

Using an e-learning model, managers reviewed ethical training material and certified their understanding and participation through an online comprehension test. This ethical awareness refresh will be an annual procedure going forward.

CBC Leaflet: The Code of Business Conduct and You

This leaflet, which is available in 17 Transcom languages, summarizes the key principles of the CBC with the aim of helping employees across the business to better understand and apply the CBC's recommendations in their daily work. It also includes guidance on how employees may raise concerns and how we as a company will treat any reports of unethical conduct we receive.

Supplier Code of Conduct

The Supplier Code asks our community of supplier partners to commit to the same values on corporate responsibility, business conduct and environmental protection as expressed in our own policies and codes.

Distribution of the Supplier Code to our key technology suppliers is administered through our own procurement software tool, meaning that all new supplier partners are asked to acknowledge and agree to the document's principles as part of an automated, trackable process.

Environmental Policy and Workplace Guidelines

Transcom's Environmental Policy clearly expresses our dual commitment to minimizing the environmental impact of our operations and to encouraging environmentally responsible behavior among our 24,897-strong workforce.

This commitment is further supported by our New Leaf Sustainable Best Practices Guidelines, which makes recycling and energy-efficient behavior standard practice in all our operational centers. The New Leaf logo and poster campaign provide further encouragement for our employee community to incorporate environmentally friendly practices into their daily routine, whether in the workplace or at home.



Corporate Citizenship

Transcom encourages employees to participate in charitable and voluntary activities as a means of

- making a positive social contribution and strengthening ties between our company and the communities near our sites
- harnessing the positive energy and goodwill of Transcom employees to live out our 5 Corporate Values
- enabling team-building and an enhanced sense of belonging through voluntary participation in community/charity projects

In 2011, Transcom people took part in wide variety community volunteering and fundraising activities, raising a cumulative total of more than €49,000 for charitable causes. We are proud to share just a few examples of our employees' corporate citizenship activities from 2011:

Transcom Cares in the Philippines

Teammates from our sites in the Philippines devoted a cumulative total of more than 3,500 hours of their free time in 2011 to join the Transcom Cares community volunteering program.

Transcom Cares offers employees the opportunity to take part in monthly community-based assignments in collaboration with local schools, religious groups, children's homes, retirement residences, homeless shelters and charitable foundations.

North America

Our operations teams the USA and Canada took part in more than 60 different community and fundraising initiatives in 2011. These included sponsored sports events, onsite charity collections, and homemade food sales, raising more than €34,000 on behalf of a variety of charitable organizations such as the Children's Wish Foundation of Canada, the Canadian Cancer Society and the Canadian Red Cross.

In addition to this, in Sault Ste Marie, Canada, Transcom's long-term commitment to support a healthcare building project culminated with the opening of the Sault Area Hospital. Through company and employee donations, Transcom contributed approximately CAD 100,000 to this community project over five years.

Italy

In April 2009, the Italian town of L'Aquila, which is home to a Transcom call center, was hit by a devastating 6.3 magnitude earthquake. Two years later, Transcom L'Aquila employees, Antonella Foresta and Giulia Cianini, compiled their colleagues' reflections and reminiscences on that fateful event in a Transcom-sponsored book, entitled "il Giglio dell'Aquila" (The Lily of L'Aquila).

The book describes the teammates' memories of the natural disaster and the difficult journey back to normality in the months that followed it. This work is dedicated to the memory of Transcom employee Simona D'Ercole, who died in the earthquake. Proceeds from sales of the book will go to support a children's project in L'Aquila, coordinated by the Italian Red Cross.

Transcom European Communication Forum

The Transcom European Communication Forum (TECF), organized by our Corporate HR Department in accordance with the EU directive on European Works Councils (EWC), was held over two days in late May 2011 in Barcelona, Spain.

This annual meeting aims to foster constructive dialogue between EWC members and Transcom's top management and gives worker representatives from across Europe the chance to share perspectives on transnational company issues.

Members of our senior leadership team addressed this year's TECF, each explaining their respective strategic priorities to the group and participating in lively Q&A sessions.