

SIMalliance Code of Ethics

Ethical behaviour underpins the way in which members of the SIMalliance (“Members”) should behave, do business and treat one another. This code of ethics (the “Code”) aims to guide Members’ actions, encouraging a way of working which is honest, responsible and respectful and fair. Any Member who fails to behave in a way which is consistent with this Code may be subject to termination as a SIMalliance member.

1. Employment Practices

Rights of Employees

Members should be committed to treating employees with fairness, respect and integrity and its actions should be guided by the following principles. Members will:

- abide by all relevant laws in the countries in which it operates;
- accept the principles of the Universal Declaration of Human Rights and will respect and support the protection of internationally-proclaimed human rights within their sphere of influence;
- operate free of any unacceptable treatment of employees, such as physical punishment, abuse of female employees, slavery. Or other forms of abuse such as the exploitation of children;
- pay employees at the very least sufficient to cover their basic needs and provide them with the opportunity to improve their skills and capabilities;
- provide a safe and healthy working environment; and
- have clear grievance and appeal procedures which are justly applied and clearly communicated.

Equal Opportunities

SIMalliance believes that a positive attitude towards equality and diversity is right for our Members and their employees, customers and business partners/suppliers. This means that Members must encourage all their employees to welcome diversity and respect each person's individuality.

Members should be committed to equal opportunities and have policies and procedures in place that seek to minimise any form of direct or indirect discrimination, harassment or bullying of employees or job applicants on the grounds of sex; ethnic or national origin, race, nationality, class, colour, sexual orientation, transsexuals, disability, marital or family status, religious beliefs, employment status; membership or non-membership of a trade union; HIV status or any other unjustifiable condition.

Members will aim to recruit, employ and promote employees on the sole basis of their ability to fulfil the requirements of the job.

These principles apply to all aspects of employment including: recruitment and selection, promotion, training, placement, reward and recognition, transfer, redundancy, dismissal, grievance and disciplinary procedures.

Employment of Young Persons

Members shall abide by the following policy on the employment of persons under the age of 18 (“**young persons**”).

No person under the age of 14 shall be employed and the SIMalliance recommends that no person under the age of 16 shall be employed. No person between the ages of 14 and 18 shall be employed unless such employment is in compliance with the health, safety and morals provisions of the International Labour Organization Convention 138 Concerning Minimum Age, a summary of which is as follows:

- for work likely to jeopardize the health, safety or morals of the worker, the minimum age is 18; if there is adequate protection and training of the worker, then the minimum age for such work is 16;
- for work which is (a) not likely to jeopardize the health, safety or morals of the worker, and (b) not such as to prejudice the worker's normal development, attendance at school or participation in vocational training, the minimum age is 14.

No young person shall be required to work more than 48 hours of regularly scheduled time and 12 hours of overtime per week nor more than six days per week.

No young person shall receive less remuneration or benefits than an equivalently skilled person of 18 years or over receives for an equivalent job.

No young person shall be employed unless such employment is in compliance with all applicable laws and regulations concerning age, hours, compensation, health and safety.

Members will not knowingly do business with any supplier which employs young persons in contravention of this policy.

2. Competition and Intellectual Property Rights

The following principles support the basic goal of the SIMalliance to promote interoperability and the rapid development of widely available specifications that will foster openness and competition in the SIM-card market to the benefit of consumers.

Competition

Members are committed to competing vigorously yet fairly. In particular, Members shall comply with the rules set out in the SIMalliance Competition Law Compliance Programme.

Intellectual Property Rights

Members should aim to protect their intellectual property and respect the intellectual property of others. Violation of copyrights, patents, trade secrets and the terms of license agreements is prohibited by law in most circumstances. Even when intellectual property is not so protected, such violations are contrary to professional behaviour. Copies of software and other materials should be made only with proper authorisation.

Members are obligated to protect the integrity of intellectual property. Specifically, Members must not take credit for other's ideas or work, even in cases where the work has not been explicitly protected, for example by copyright or patent.

In particular, Members shall comply with the SIMalliance Intellectual Property Rights Policy, which sets out provisions concerning the ownership, exploitation, licensing and restrictions of use of the intellectual property of the SIMalliance and its Members.

3. Health and Safety

Members will give safety and security their highest priority at all times and will provide a safe, healthy and secure working environment.

Members will never knowingly compromise the safety of their employees or customers or the public. Members will be fully compliant with applicable international, national and local health and safety standards in all countries in which they operate.

4. Environment

Members will support the conservation of the environment in its broadest sense and recognise that certain resources are finite and must be used responsibly. Members will therefore maintain an appropriate environmental policy will seek to reduce and mitigate our environmental impacts.

Members will be committed to making continuous improvements in the management of their environmental impact as part of an overall goal of developing a sustainable business. Members will work to promote environmental care and awareness with emphasis on the need to reduce energy consumption and waste production. Members will monitor and report on environmental management. Specifically, Members will:

- comply with all relevant environmental laws and regulations;
- reduce waste by re-using or recycling materials where appropriate;
- reduce consumption of energy by sensible energy management of buildings equipment and vehicles;
- reduce, or avoid where possible, the use of hazardous substances in the course of their business;
- reduce, or avoid where possible, pollution of the air, land or water;
- where possible, liaise with their customers and suppliers to promote sound environment practice in the selection, use and disposal of all materials used in the course of their business; and
- encourage the development of good environmental practice by all their employees.

5. Other standards of behaviour

Obeying the law

Members must comply with the laws and regulations of the countries in which they operate. Members should operate both within the letter and the spirit of law.

Business Integrity

Members will not engage in any corrupt or fraudulent activity. In particular, Members will put in place policies and procedures designed to ensure that its employees avoid business, financial or other interests or relationships which conflict with the interests of the Members. Such a conflict may arise in the following circumstances:

- ownership of or an interest in a competitor or in a business with which the Member has or is contemplating a relationship (such as a supplier, customer, landlord, distributor, licensee/ licensor, etc.);

- providing service to a competitor or a proposed or present supplier or customer as an employee, director, officer, partner, agent or consultant;
- soliciting or accepting gifts, payments, loans, services or any form of compensation from suppliers, customers, competitors or others seeking to do business with the Member. Social amenities customarily associated with legitimate business relationships (such as lunches or gifts of a modest value) are permissible. All of the Member's business dealings must be on arm's-length terms and free of any favorable treatment resulting from the personal interest of its employees;
- influencing or attempting to influence any business transaction between the Member and another entity in which an employee has a direct or indirect financial interest or acts as a director, officer, employee, partner, agent or consultant; and
- buying or selling securities of any other company using non-public information obtained in the performance of an employee's duties, or providing such information so obtained to others.

No funds, assets or information of the Members shall be used for any unlawful purpose. No undisclosed or unrecorded fund or asset shall be established for any purpose. No false or artificial entries shall be made in the books and records of Members for any reason. No payment shall be approved or made with the agreement or understanding that any part of such payment is to be used for any purpose other than that described by documents supporting the payment.

Data Privacy

It is the responsibility of Members to maintain the privacy and integrity of data describing individuals. This includes taking precautions to ensure the accuracy of data, as well as protecting it from unauthorised access or accidental disclosure to inappropriate individuals. Furthermore, procedures must be established to allow individuals to review their records and correct inaccuracies.

This imperative implies that only the necessary amount of personal information be collected in a system, that retention and disposal periods for that information be clearly defined and enforced, and that personal information gathered for a specific purpose not be used for other purposes without consent of the individual.