

APRIL 2026

Code of Business Ethics and Conduct

Connecting every business with every customer, everywhere in the world



A message from our CEO

Dear Sinchers,

Our vision is to connect **every business** with **every customer**, **everywhere** in the world. Fulfilling this requires us to be the **most trusted foundation for intelligent, secure, and scalable** customer communications. As we lead the shift into the new era of agentic communication, where technology acts on behalf of users, our integrity is more important than ever. This is why we have updated our Code of Business Ethics and Conduct (the “Code”).

The Code is the embodiment of our values in action. It’s our guide for how we **Dream Big** and **Make it Happen** responsibly, and a reminder that while we strive to **Keep it Simple**, we are always thoughtful and diligent behind the scenes.

Most importantly, the Code reinforces what it means to **Win Together**. The value is about our shared commitment to doing what’s right – for our customers and for each other. Making the right choice is not always easy, but you will not have to make it alone. When you choose the path of integrity, our leadership team and the entire company will stand with you.

I ask that you **take the time to read and absorb this vital document**. It is our guide to helping our customers strengthen **relationships**, deliver better **experiences**, and **grow** with confidence.

Thank you for your commitment to upholding these standards.

Laurinda Pang
CEO



Table of contents

Introduction

Message from Laurinda	2
Our mission and values	4

Acting with integrity

About the Code	6
Roles and responsibilities	7

Speaking up

Raising ethics and compliance concerns	9
--	---

Integrity at the workplace

A diverse and inclusive workplace, safe from discrimination	11
Safe and healthy working environment	12

Integrity in our business

Protect our assets and intellectual property	14
Maintain accurate books and records	15
Maintain proper financial controls and prevent fraud	16
Protect our data and systems and use artificial intelligence responsibly	17
Represent the company only when authorized	18
Avoid conflicts of interest	19
Engage only with third parties who share our ethical and sustainable standards	20

Integrity in the market

Protect and do not misuse inside information	22
Win based on our offering, never improperly influence	23
Respect international trade and anti-money laundering laws	25
Compete fairly	26
Respect the privacy of individuals	27

Integrity as a force for good

Respect the environment and limit our impact	29
Protect the human rights of others	30
Engage yourself politically but not on behalf of Sinch	31
Only allow the use of Sinch products in line with legitimate purposes	32

Our mission and values

At Sinch, we've got big dreams, and we make great things happen – for our teams, our customers, and their customers. Driven by bold ambitions and simplicity, we're connecting every business with every customer, everywhere in the world and powering the most trusted foundation for intelligent customer communications. Underlining our four values is our commitment to integrity – at the workplace, in our business, in the market, and as a force for good.



Dream big

We aim high in everything we do, making the impossible possible to solve our customers' challenges.



Win together

We know that great teams work faster and better together. Together as one global team, we embrace diversity and care about every single individual.



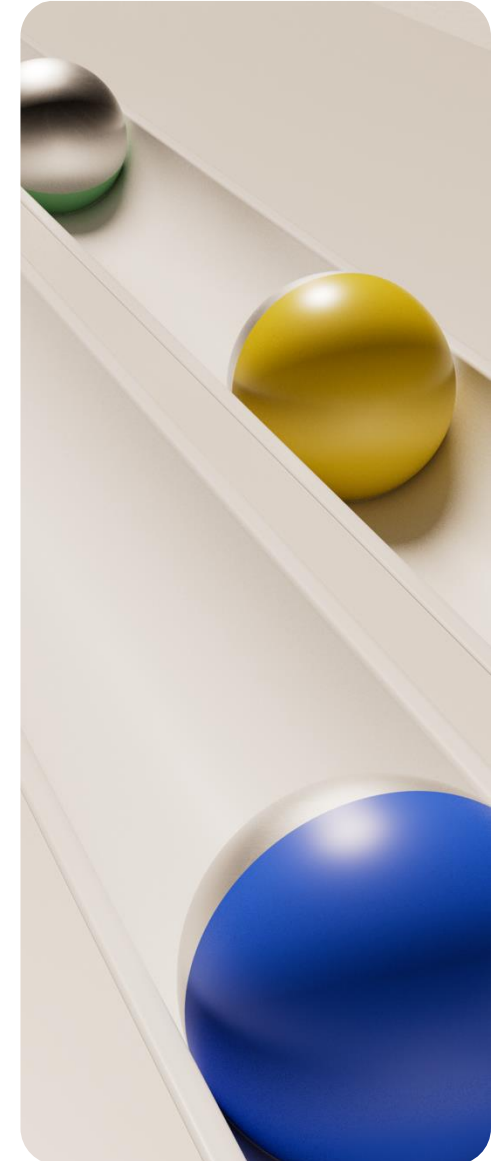
Make it happen

We make things happen and make them matter. We hold ourselves and our business accountable, applying the highest standards to everything we do.



Keep it simple

Sinch means simple and easy – and that's how we want our customers to feel about their experience working with our teams and products.



Acting with integrity

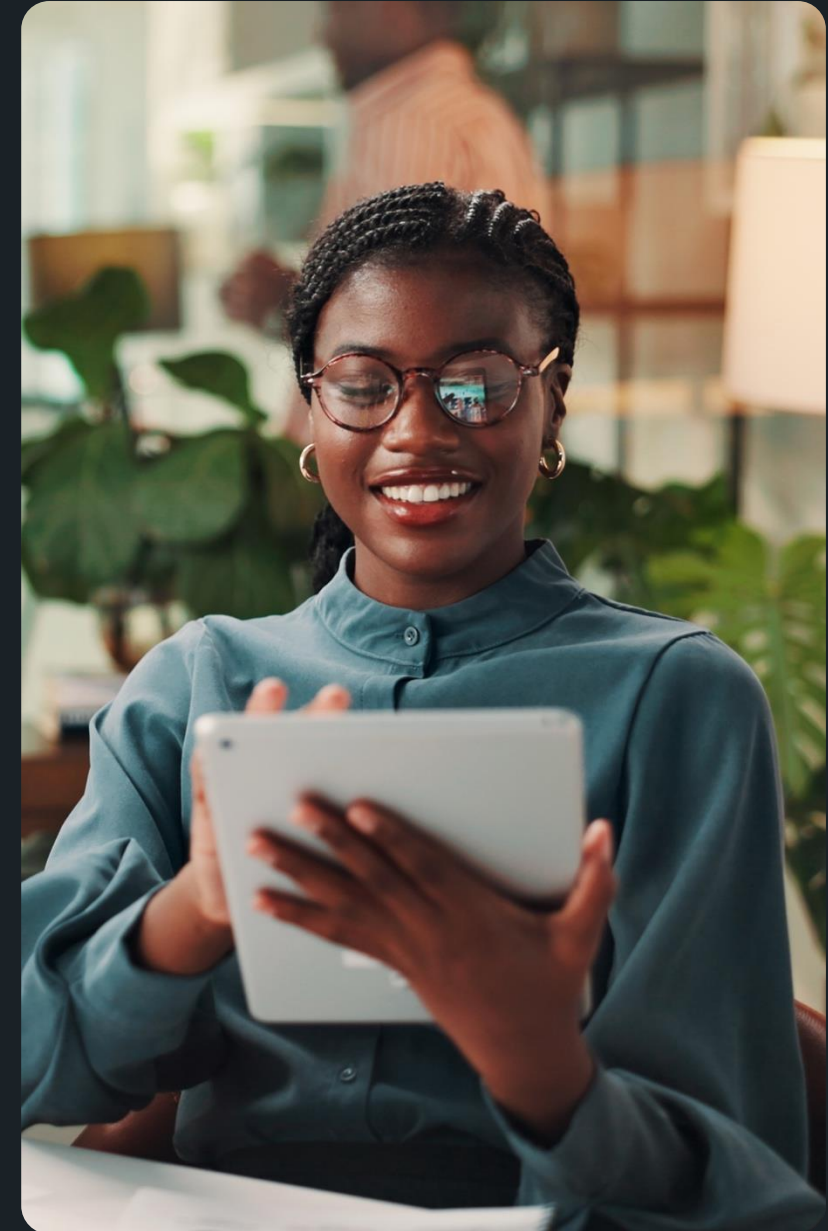


About the Code

At Sinch, doing business with integrity is the foundation for our business principles. This includes complying with all applicable laws, regulations, and governing documents. Our Code of Business Ethics and Conduct (the “Code”) applies to everyone working for or on behalf of any Sinch entity, including employees, consultants, vendors, partners, and the Board of Directors.

Our Code outlines our ethical values and provides guidance for handling ethical dilemmas or compliance concerns. We expect all Sinchers to uphold these values, follow all internal governing documents, and speak up if they have any questions or concerns.

All Sinchers are required to acknowledge they have read and understand this Code. We also encourage you to revisit the Code when you have questions, engage with others to identify areas for improvement, and live by this Code in all decisions you make.



Roles and responsibilities

Why do we have the Code

Our Code of Business Ethics and Conduct forms the foundation of our governance framework and sets the expectations for conducting business ethically and responsibly. It serves as a roadmap that connects all policies, procedures, guidelines, tools, and templates across the company. To succeed as a business, we must ensure that all individuals working for or on behalf of Sinch share our ethical values and abide by our governing documents.

Roles and responsibilities

Our CEO holds ultimate responsibility for the Code of Business Ethics and Conduct, which is adopted by the Board of Directors. Group Ethics & Compliance is responsible for implementing, promoting, monitoring, and enforcing the Code.

All policy and process owners are accountable for ensuring the Code is integrated into our policies and procedures. Leaders and people managers are responsible for communicating the Code to their teams and emphasizing the importance of living by the Code every day.



Speaking up



Raising ethics and compliance concerns

We must speak up if something doesn't seem right.

If you are aware of a violation of this Code, unethical behavior, or have a concern:

- Speak with your manager or your manager's manager
- Consult with your HR Business Partner or the Group Ethics & Compliance Function
- Or report via SpeakUp.

SpeakUp is Sinch's ethics and compliance reporting line, available 24/7, 365 days per year, and hosted by an independent third party. Reports may be submitted in local language, either in writing or orally, and are sent directly to Group Ethics & Compliance. Reporters can report anonymously, where permitted by local law.

All Sinchers are expected to speak up if they know of or suspect a breach of this Code and to cooperate in any internal investigations. Failure to do so may result in disciplinary action. All reports will be reviewed by Group Ethics & Compliance and, if warranted, investigated or referred to another function for review and assessment. Anyone who reports a concern in good faith will be protected from retaliation.

Managers or leaders who receive an ethics and compliance concern must report it to Group Ethics & Compliance or via SpeakUp. While they may need to gather information from the reporter, they should not conduct their own investigation due to potential legal complexities. Managers should resolve performance issues and process non-adherence but must escalate matters relating to misconduct or business ethics.



[Ethics & Compliance Reporting Line](#)

For further information, see:

1. [Reporting Compliance Concerns Policy](#)
2. [Allegation Management Procedure](#)

Integrity at the workplace



A diverse and inclusive workplace safe from discrimination

We cultivate a respectful, inclusive, diverse, and safe working environment where everyone can be their most authentic selves without fear of discrimination or harassment.

We recognize that true excellence can only be achieved by embracing the full diversity of our global community. We are committed to fostering an environment where everyone is respected, valued, and empowered to contribute their unique strengths. We believe that the best ideas come from diverse points of view and experiences. Sinch's commitment to diversity, equity, and inclusion strengthens our capacity to innovate and grow and reinforces our duty as a global organization to promote dignity, understanding, and opportunities regardless of protected status. Protected status could include, for example, race, color, genetic information, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, veteran status, marital status, neurodivergence, or any other aspect of identity protected by applicable

laws and regulations. We strictly prohibit discrimination, harassment, bullying, and any form of abusive behavior.

You must

- Never engage in discrimination, harassment, and any other form of abusive behavior throughout Sinch's operations, workforce, supply chains, and partnerships.
- Ensure all Sinchers feel equally welcome, valued, and included as team members.
- Ensure merit and qualifications are the only considerations in hiring and promotion decisions.



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For further information, see:

1. [Recruitment Procedure](#)

Safe and healthy working environment

We are committed to providing a safe working environment for all Sinchers.

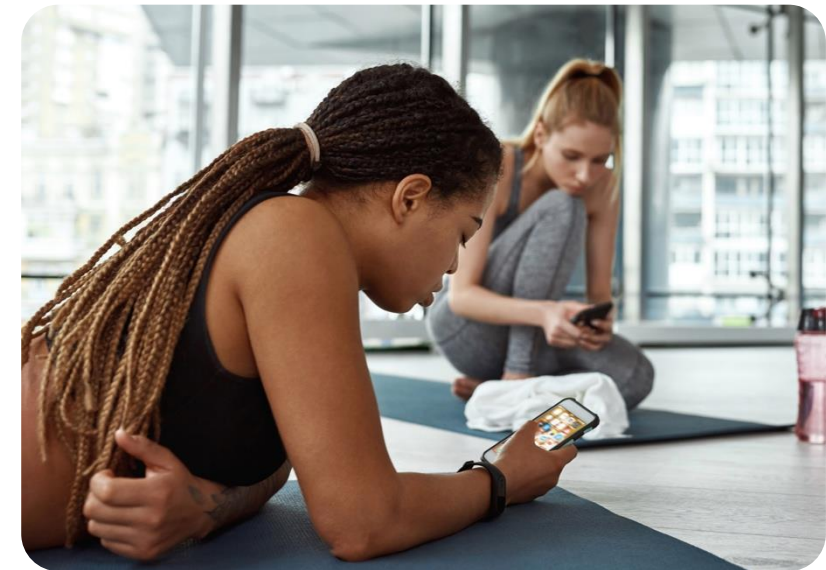
Sinch will take all necessary steps to control hazards and implement precautionary measures to prevent accidents and occupational diseases. Whenever necessary, Sinchers will be provided with, and instructed to use, appropriate personal protective equipment. We must take reasonable care of our own health while at work, adhere to safety rules and work procedures, use safety equipment provided, and actively contribute to maintaining safe and healthy conditions in the workplace, a sustainable work-life balance, and preserving a sound environment.

Alcohol and substance abuse are serious issues that require attention. Employees who take or are under the influence of alcohol or drugs in the workplace negatively impact the working environment and introduce risks at work both for themselves and their colleagues. Sinch workplaces are alcohol and drug-free. Under no circumstances are Sinch employees permitted to be under the influence of alcohol or drugs during working hours.

The consumption of alcohol during training courses, conferences, and events should be carefully managed. Wine and beer may be served with meals after working hours.

You must

- Comply with governing documents, safety rules, instructions, and working procedures and use appropriate personal protective equipment when required.
- Participate in maintaining safe and healthy working conditions and report any workplace hazards.
- Abstain from the use or influence of alcohol and drugs during working hours.
- Managers should, where possible, avoid causing an unhealthy work-life balance for their employees.



For further information, see:

1. [Travel & Expense Policy](#)

Integrity in our business



Protect our assets and intellectual property

We protect our assets, confidential information, and intellectual property.

Sinch employees must protect the company's assets. Employees must not misuse or misappropriate the company's assets for personal gain or for purposes unrelated to their duties. This includes, but is not limited to, company funds, equipment, materials, intellectual property, and data.

Sinch's intellectual property, including trade secrets, business plans, databases and customer lists are valuable assets and must be protected by us. This includes not copying, using, or sharing copyrighted materials unless they obtain the specific, written, prior consent of the owner. We should always respect and comply with open-source software licenses.

Company funds should not be used for any unlawful or unauthorized purpose.

You must:

- Use company assets appropriately and in line with our governing documents.
- Never discuss confidential information in public places or via the internet.
- Not engage in theft or fraudulent activities, including asset misappropriation (stealing company property), falsifying records, or diverting company funds for personal use.
- Only share confidential information if you are authorized and have a legitimate business reason.
- Return all company information and assets upon leaving the company.



For further information, see:

1. [Expenditure Approval Policy](#)

Maintain accurate books and records

All financial transactions and records must be accurately documented and reflect the true nature of the transaction. Books and records must be complete and timely, with no omissions or misrepresentations.

All books and records must comply with applicable financial reporting standards and governing documents. We adhere to tax laws, financial reporting requirements, and other industry-specific regulations.

You must

- Act with integrity and honesty when maintaining and reporting financial information.
- Not intentionally misstate, conceal, or falsify any financial data or supporting documents.
- Ensure proper authorization for transactions by individuals designated with the authority to approve such transactions.
- Securely store books and records for the legally-required retention period.
- Provide access to financial records only to those with legitimate business needs and in accordance with our governing documents.
- Maintain adequate documentation and record-keeping for financial transactions, including invoices, receipts, contracts, or other relevant documents.



For further information, see:

1. [Finance Policy](#)
2. [Tax Policy](#)
3. [Travel & Expense Policy](#)

Maintain proper internal controls and prevent fraud

We are committed to maintaining a system of internal controls that ensures the accuracy of financial and sustainability reporting and protects organizational assets.

We must act with integrity to ensure that internal control procedures are followed without compromise. Sinch employees are accountable for their actions related to internal controls, including promptly reporting any weaknesses or failures.

Sinch will comply with laws and regulations by making sure internal control procedures are aligned with applicable laws, regulations, and accounting standards, including but not limited to IFRS, and other regulatory frameworks specific to our industry. Segregation of duties is a critical component of our control framework and is necessary in preventing errors and fraud.

Responsibilities for authorization, record-keeping, and asset custody should be divided among different employees to ensure checks and balances. Sinch must ensure that internal controls are regularly monitored to ensure they are functioning as intended.

Sinch will perform risk management assessments to identify risks related to strategic, operational, legal & compliance, and financial areas, and appropriate controls will be put in place to mitigate these risks. The organization will maintain a proactive approach to identifying emerging risks and adjusting controls accordingly.

You must

- Never seek to circumvent internal controls.
- Cooperate with auditors and provide necessary information and access to records.

For further information, see:

1. [Finance Policy](#)

Protect our data and systems and use artificial intelligence responsibly

We are diligent in safeguarding our assets from threats and only use artificial intelligence which aligns to our principles.

We secure Sinch data when in storage, being sent across Sinch networks, or used by third-parties. Employees and third parties who process data which directly identifies an individual must adhere to privacy laws of the jurisdiction where the individual resides.

We utilize artificial intelligence, whether developed internally or externally when it adheres to the principles of: (1) purpose driven, (2) ethical and responsible, (3) lawful, and (4) safe secure and trustworthy. All artificial intelligence applications must be registered, evaluated, and fully compliant with relevant governing documents.

You must

- Never share authentication details, including passwords and regularly update passwords as required.
- Ensure information technology assets, including computers and mobile devices, are updated with the most recent approved software version.
- Where appropriate, engage with the AI Board to assess the risks associated with the use of new artificial intelligence tools.



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For further information, see:

1. [Information Security Policy](#)
2. [AI Governance Procedure](#)

Represent the company only when authorized

We do not enter into verbal agreements or represent the company without proper authorization and authority.

When Sinch enters into a business transaction, the transaction must be documented in writing – we call this a contract. Before entering into any contract, you need to make sure that you understand the terms of such contract and that the terms are in the best interest of Sinch. You must also make sure that you are authorized to approve and sign the contract in accordance with applicable policies. We only represent Sinch externally when we are authorized to do so – this includes with authorities, regulators, investors, or in any other capacity.

You must:

- Enter into written contracts (not verbal) that follow our approved contract templates (or approved deviations) with customers, vendors, partners, or other third parties.
- Ensure the substance of the transaction is accurately reflected in the written contract.
- Ensure you have proper delegation of authority to sign on behalf of the company, including limits on spending authority and the provision of services.
- Ensure signed contracts are shared and stored appropriately, including with the relevant Business team, Procurement, and Partnering.

- Report to your manager if you are approached by external parties, including but not limited to investors, authorities, and regulators.
- When posting on social media, clearly state that your opinions are your own and not those of Sinch, unless you have authorization to do so.

For further information, see:

1. [Authorization and Signing Policy](#)

Avoid conflicts of interest

We act in the best interest of Sinch and avoid actual or perceived conflicts of interest.

At Sinch, we work diligently to help our more than 175,000 customers to connect globally via our best-in-class customer communications cloud. Doing business on a global scale with a diverse workforce brings with it potential conflicts of interest. A conflict of interest is any situation where your interests are, or could be perceived as being, impaired due to your personal interests outside your employment. We must ensure that we actively avoid these situations, promptly disclose them, and follow guidance received.

Examples of conflicts of interest could include:

- Performing work outside of your responsibilities at Sinch which could interfere with your job responsibilities, including employment, directorships, consulting engagements, whether paid or unpaid.

- Having a direct financial interest, indirect interest via family or close friends, or complete work for any third party that is currently or could in the future have a relationship with Sinch, including suppliers, customers, partners, or competitors.
- Having a personal or romantic relationship with anyone whom you supervise, whether they report to you directly or you provide indirect oversight of their responsibilities or performance.

You must

- Promptly disclose any actual or potential conflict of interest to your manager, Human Resources, or Group Ethics & Compliance.
- Follow all guidance and conditions attached to the approvals to avoid any conflict of interest.
- Follow all terms of your respective employment or consultant agreement, including prohibitions on other employment, where applicable.



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For further information, see:

1. [Anticorruption Policy](#)
2. [Related Party Transaction Procedure](#)

Engage only with third parties who share our ethical and sustainable standards

We only work with third parties who share our ethical values and demand the same standards of integrity that we demand of ourselves.

All personnel involved with purchasing should interact with suppliers in a fair, ethical, and responsible manner. Sinch purchases products and services from many different suppliers. Many of them are small companies, others are multinational companies. Not all of these suppliers are aware of our expectations concerning our business relationship with them. It is therefore crucial that we act in accordance with our governing documents.

It is necessary that all employees understand the importance of protecting Sinch's reputation of honesty and integrity in all our relations. If you are responsible for selecting a supplier, you should base your decision on merit, quality of service, reputation, and act in Sinch's best interests.

When selecting and renewing suppliers, you must follow our governing documents, processes, and ethical business practices.

You must

- Follow our applicable bidding, negotiating, and contracting processes as defined in the Procurement Group Policy.
- Perform, if applicable, appropriate due diligence in accordance with Sinch standards.
- Avoid potential or actual conflicts of interest with suppliers.



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For further information, see:

1. [Business Partner Code of Conduct](#)
2. [Procurement Policy](#)

Integrity in the market



Protect and do not misuse inside information

We never utilize confidential inside information for personal gain.

Sinch is a publicly listed company. This means that it is possible to buy or sell Sinch stock on a regulated market. To use "inside information" when doing so or to share such information with others for a similar purpose could constitute insider trading and is illegal. "Inside information" is defined as information that is precise, non-public and likely to affect the share price. Examples include financial results, mergers and acquisitions activity, major product launches, large customers won or lost, material legal matters, and changes in executive leadership. Employees involved in activities dealing with inside information are often, but not always, added to insider lists according to our processes and provided further guidance. When in doubt, you should always seek guidance from Legal & Compliance.

You must

- Never buy or sell stock and other securities when holding inside information or provide this information to others such that they may do so.
- Never share inside information with others, internally as well as externally, without obtaining approval in accordance with our governing documents. When storing and sharing insider information, follow applicable procedures and guidance.
- Remember that we all are bound by non-disclosure agreements regardless if information is classified as insider information or not.
- Engage with Legal & Compliance to obtain additional guidance, if needed.



For further information, see:

1. [Insider Policy](#)

Win based on our offering, never improperly influence

We compete fairly and never use an improper influence to win business.

Sinch prohibits all form of corruption in our business dealings. By conducting business responsibly, you help to reinforce our reputation for acting with integrity. You are responsible for understanding how to identify and avoid all forms of corruption, as outlined in this Code and our Anticorruption Policy.

Subject to several narrowly tailored exemptions identified in the Anticorruption Policy, you must obtain pre-approval from your respective Regional General Counsel before providing any benefit to a customer representative or government official.

Any such payments or other value provided to a customer or government officials, directly or indirectly through a third party, must be accurately and transparently recorded in our books and records.

You must

- Never offer, directly or indirectly through a third party, anything of value to improperly obtain or retain business, influence business decisions, or secure an unfair business advantage.
- Never make facilitating payments to government officials.
- Request pre-approval from your Regional General Counsel if you wish to provide anything of value to a customer representative or government official.
- Promptly report any suspected bribery, demands for a bribe, or the actual payment of a bribe made under coercion in accordance with the reporting guidelines provided in the Code.

For further information, see:

1. [Anticorruption Policy](#)
2. [Travel & Expense Policy](#)

Public officials and anything of value

Anti-corruption laws vary by country. While Sinchers may not offer anything of value to influence a business decision, you should be aware some cases carry a significantly enhanced legal risk and could result in personal legal liability to themselves as well as to the Company. The descriptions provided here are for illustrative and educational purposes only. Should you need legal guidance, please contact your manager or Regional General Counsel.

What is a public official?

The terms public official and government official are often used interchangeably. Providing a benefit to any of these persons could, depending on the circumstances, bring increased scrutiny. Accordingly, any such benefit should be pre-approved by your Regional General Counsel.

Public officials could include:

1. Government employees, such as government administrators, judges, or regulators;
2. Employees of state-owned or controlled companies, such as several mobile network operators; and
3. Employees of companies that perform a critical role in society, such as financial institutions.

What is “anything of value”?

Anything of value includes not only cash, but also:

- Gifts
- Hospitality (travel, meals, and entertainment)
- Donations and sponsorships
- Employment of family members or friends (paid or unpaid), or anything else that could be perceived as valuable to a recipient.



For further information, see:

1. [Anticorruption Policy](#)
2. [Travel & Expense Policy](#)

Respect international trade and anti-money laundering laws

We adhere to all applicable laws and regulations governing international trade and anti-money laundering.

Sinch, as a global company, must comply with various laws related to the enforcement of trade sanctions, including export controls, embargoes, and sanctions. These laws limit where and with whom we may conduct business as well as what products may be exported to certain jurisdictions.

You must

- Be aware of restrictions due to sanctions or export controls that might apply to your business in advance and obtain any required export control licenses, where required.
- Ensure our sanctions screening process is completed prior to onboarding any new third party and act quickly if this changes.

We do not support any activity that could be seen as a violation of applicable anti-money laundering or terrorism financing laws. Money laundering is where someone tries to hide the true origins of funds obtained through crime and is illegal. Terrorism financing is when funds are used to support terrorist activities. Extra caution should be taken when working in any area where there is known terrorist activity.

You must

- Never engage with or accept funds from a third party if you suspect the funds could relate to criminal activity.
- Exercise caution when working with or in a geography where there is known terrorist activity.



For further information, see:

1. [Trade Compliance Policy](#)
2. [Anticorruption Policy](#)

Compete fairly

We never engage in anti-competitive behavior.

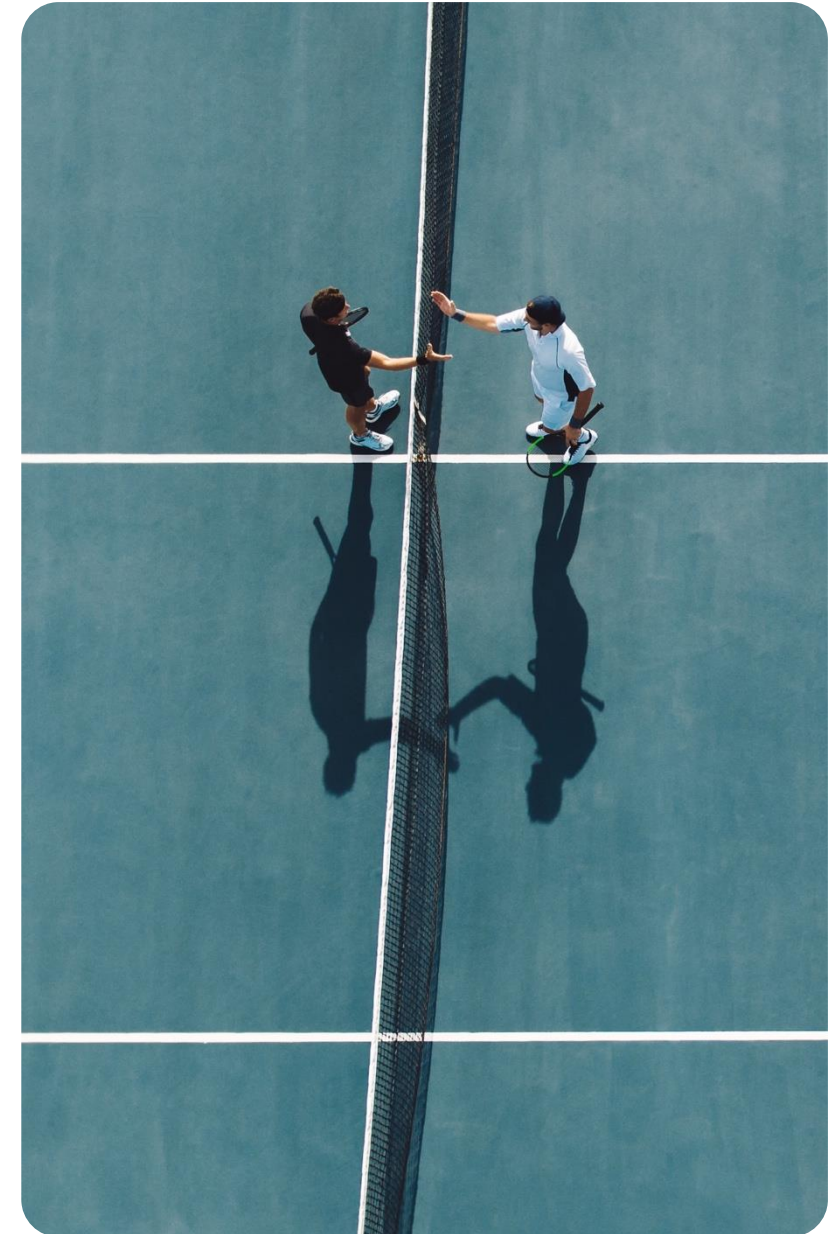
At Sinch, our offering is our strength. We compete aggressively but always in a fair manner and never deceive, misrepresent, or resort to unfair practices. We will never enter into an improper agreement, regardless of form, with a competitor or seek to obtain sensitive data from competitors, including pricing, market information, or strategy.

For further information, see:

1. [Competition and Anti-trust Policy](#)

You must

- Follow all applicable governing documents related to competition and anti-trust in your dealings with customers, suppliers, competitors, or other third parties.
- Never engage in an agreement with a competitor whether written, oral, or implied related to pricing, markets, or strategy.
- Only collect competitive intelligence from open sources and never utilize inside information, regardless of the source.
- Never enter into an agreement with customers, suppliers or other third parties that would prevent the rights and movements of employees or effectively limit or fix wages.
- Engage with your Regional General Counsel related to exclusivity or non-compete agreements.



Respect the privacy of individuals

We respect the privacy of others and protect their personal data.

Sinch recognizes that privacy is important to our customers and our business partners, as well as to our employees. Sinch is committed to respecting and protecting the privacy of any individual and acting in accordance with local laws and regulations.

Personal data includes any data that would identify a specific individual, in itself, or combined with other data e.g., name, address, phone number, email address, IP address, employee number, bank details, etc. Processing of personal data should be limited to what is needed for business and operational purposes, including, but not limited to relevant commercial activities, efficient customer care and proper administration of our human resources and third parties.

You must

- Only collect, process, and store personal data for relevant business and operational purposes.
- Not keep personal data longer than is necessary for the purposes for which the data was collected.
- Ensure data is up-to-date and accurate.
- Keep personal data secure and immediately report any potential breach in accordance with the reporting guidelines provided in the Code.
- Consult with Group Privacy if you are considering new personal data usage.



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For further information, see:

1. [Privacy Policy](#)

Integrity as a force for good



Respect the environment and limit our impact

We commit to limiting our impact on the environment.

Sinch has committed to Science Based Targets to decrease emissions to net zero by 2050. This is in alignment with the Paris Agreement to keep global warming to 1.5°C above pre-industrial levels. Particular care is required for any products or processes with an environmental effect.

Sinch promotes sustainability and cost efficiency by proactively reducing resource consumption in general, and energy in particular, and thus the impact of the environment.

You must

- Optimize resources and prioritize renewable or low-carbon energy options in the operation of Sinch processes.
- All things equal, select and engage with partners and suppliers who adhere to a low-carbon policy or demonstrate an ambition to implement such practices.
- Seek to limit business travel and where necessary, consider options with a lower climate impact, for example rail vs. air.
- Comply with related governing documents and contribute to achieving our climate goals.
- Ensure data related to activities measurable under sustainability reporting are truthful and provided in a timely manner.



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For further information, see:

1. [Business Partner Code of Conduct](#)
2. [Travel & Expense Policy](#)
3. [Procurement Policy](#)

Protect the human rights of others

We respect and protect human rights as the foundation of conducting responsible and sustainable business.

Across all our operations worldwide, we work diligently to avoid causing or contributing to human rights abuses including slavery and human trafficking and to address such issues promptly and transparently.

Through continuous engagement with our employees, partners, customers, and communities, we strive to uphold and advance these principles, confident that respecting human rights underpins our long-term success and societal impact.

We are committed to respecting human rights, employee rights, and international labor standards in accordance with:

- UN Universal Declaration of Human Rights,
- The core conventions of the International Labour Organization (ILO),
- OECD Guidelines for Multinational Enterprises, and
- The Ten Principles of the UN Global Compact

You must

- Respect and uphold the human rights of all individuals, including colleagues, customers, and third parties in all areas of your work.
- Comply with related governing documents and contribute to the respect of human rights.



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For further information, see:

1. [Business Partner Code of Conduct](#)
2. [Procurement Policy](#)

Engage yourself politically but not on behalf of Sinch

We act in the best interest of Sinch and do not represent our personal political views as those of the company.

Sinch respects every individual's right to express their political views and participate in civic discourse in their personal capacity. We fully support freedom of speech, but we expect employees to do so without implying or suggesting any endorsement, affiliation, or representation of the company. Therefore, no company logos, tags, or official references should be included in personal posts or profiles when engaging in political activity.

In keeping with our core values, we maintain a zero-tolerance policy for discrimination, and harassment, including hate speech, and the promotion of misinformation in any forum or format. Violations of this policy will be taken seriously and may result in disciplinary action, up to and including termination.

You must

- Exercise judgment when choosing to engage yourself politically.
- Should you wish to be politically engaged, ensure that you are representing yourself only in your personal capacity and not Sinch.
- Ensure your personal profile is free of Sinch logos, tags, reference, etc. to ensure personal political views are not misconstrued as those of Sinch.
- Never engage in hate speech, promote misinformation, discriminate or harass others.



Only allow the use of Sinch products in line with legitimate purposes

Being a trusted partner to our customers, suppliers, and employees is paramount. As such, Sinch is diligent in protecting its services, network, users and the internet community from improper and/or illegal activity.

Sinch believes external fraud is detrimental to communities and society-at-large and presents significant risks to Sinch's business. As such, Sinch maintains Acceptable Use Policies depending on product and geography. Customer onboarding and verification as well as related approvals and ongoing monitoring are designed to prevent, detect and remediate any instances of violations of our Acceptable Use Policies and/or external fraud.

You must

- Ensure all customer onboarding and monitoring procedures are followed in line with applicable governing documents.
- Never hide or misrepresent the intended purpose of any customer's use of Sinch services.
- Promptly report any red flags related to a customer's use of Sinch services.
- Require partners and distributors to agree to our conditions to prevent the misuse of Sinch products in any illegal or harmful activities



For further information, see:

1. [Know Your Customer Policy](#)

Thank you

