

Code of Ethics & Conduct



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All TELUS Digital team members:

At TELUS International (Cda) Inc. (TELUS Digital), our shared commitment to ethical conduct is the cornerstone of our world-leading culture. Our team members strive to interact with our many stakeholders and each other in a way that is authentic, transparent and fair. This includes creating a work environment where our team members feel physically and psychologically safe, and where honest feedback is both encouraged and embraced. These expectations apply not only to our team members across the globe, but also to our contractors, partners, suppliers, vendors, board members, and other groups that represent or act on behalf of TELUS Digital in any way.

Our Code of Ethics & Conduct guides our actions and serves as a resource for all members of our TELUS Digital family. The Code provides tangible examples of how each of us can ensure we are always conducting ourselves ethically and transparently, including ways to avoid conflicts of interest; the rules around accepting gifts and benefits; the many ways in which we are all responsible for protecting TELUS Digital's brand, reputation, assets, information and intellectual property; and the critical role we all play in safeguarding our customers' data, security and privacy. The Code ensures that every TELUS Digital team member is guided by the same values and understands what is expected, regardless of work location or role in our organization. Notably, this year's Code further strengthens the ethical expectations of our team members who work remotely, as we continue to evolve our Work Styles program to reflect today's society. In this regard, we ask that you familiarize yourself with our updated Code of Ethics & Conduct to make sure you are always meeting our company's expectations.

On behalf of our entire TELUS Digital leadership team, thank you for following our Code of Ethics & Conduct and for continuing to promote inclusion, authenticity and transparency across your teams, each and every day. It is our collective efforts to embrace ethical behavior that bring to life our caring culture and empower TELUS Digital to win the hearts and minds of customers around the world.

With appreciation,
The TELUS Digital Executive Leadership Team.



Jason Macdonnell

Acting Chief Executive Officer and Chief
Operating Officer of TELUS Digital, and
President, TELUS Digital Customer Experience



Michel Belec

Senior Vice-president,
and Chief Legal Officer



Gopi Chande

Senior Vice-president,
and Chief Financial Officer

TELUS Digital Values

The TELUS Digital team works together to deliver future friendly services, and our values guide the way:

- ▼ We embrace change and initiate opportunity
- ▼ We believe in spirited teamwork
- ▼ We have a passion for growth
- ▼ We have the courage to innovate

Why do we have a Code?

TELUS Digital strives to conduct its business in accordance with the highest ethical standards and in compliance with all applicable governmental laws, rules and regulations. TELUS Digital's Code of Ethics & Conduct (the “Code”) outlines the behaviors that we must exhibit in order to meet and uphold TELUS Digital's ethical and conduct standards. The Code is intended to set the tone for how we work at TELUS Digital and to help us recognize ethical and compliance issues before they arise and guide how we deal with those issues should they arise. The Code is intended to meet the requirements for a code of ethics under the Sarbanes-Oxley Act of 2002, the listing standards of the New York Stock Exchange (“NYSE”) and the Toronto Stock Exchange. Any questions about how to interpret the Code should be raised with the Ethics Office, which can be reached at:

- <https://secure.ethicspoint.eu/domain/media/en/gui/16533/index.html>,
- ethics@telus.com, or
- toll free if calling from Canada or the US at 888-265-4112 (toll free lines are available in all countries where TELUS Digital operates and can be located at the ethics point website).

The Code applies to the Board of Directors (the “Board”), the Executive Leadership Team (the “ELT”), officers (including, but not limited to the principal executive officer, financial officer, accounting officer and/or controller, or persons performing similar functions to the extent not included in the ELT) and employees (collectively referred to as “team members” or “TELUS Digital team members”) of the TELUS Digital group of companies (i.e. TELUS International (Cda) Inc. and all of its subsidiaries and affiliates, including the TELUS Digital group of companies) that are directly or indirectly controlled or managed by TELUS Digital. In this Code, we refer to all of these entities collectively as “TELUS Digital”. Team members are required to review this Code at least annually to remain familiar with its terms and to adhere to them. Suppliers and contractors are subject to the Supplier Code of Conduct. To assist team members in remaining familiar with the Code, they are required to complete the Integrity training course each year. Team members must also complete any other required compliance courses in a timely manner.

The Code cannot address every possible ethical scenario we may face. Countries in which TELUS Digital operates have differing laws with which TELUS Digital must comply, so it's up to team members to use good judgment and seek guidance from their leader or the Ethics Office when they have questions, are unsure about the right course of action, or see something that doesn't appear to be right.

The Code is reviewed every two years and revised as necessary, and we created this Code, together with our values to serve as your guide to acting with integrity.

Compliance with the Code constitutes a term of employment and/or offer of employment, where applicable. Any violation of this Code or any applicable law will be subject to disciplinary action, up to and including possible termination of employment with just cause.

TELUS Digital reserves the right to revoke or amend any term of the Code if required through the needs of the business. TELUS Digital will notify team members of any amendments to the Code before the changes come into effect.

The Code is available on the TELUS Digital intranet ("Cosmos"), and is [publicly available](#).

Responsibilities

All TELUS Digital Team members

Ethical behavior is an individual responsibility and maintaining high ethical standards is the expectation of all of us. All team members are expected to behave in an honest, ethical and professional manner with all of their dealings, comply with the laws, rules and regulations governing our businesses. All team members have an obligation to raise issues or concerns about any suspected or known misconduct with their leader or the Ethics Office. These standards require that all team members understand and apply the guidelines in this Code to everyday actions and decisions. Failing to read or attest to the standards does not excuse us from these responsibilities. Team members are accountable for adherence to this Code.

At TELUS Digital, we not only do things right, but we should strive to do the right things.

All business activities should be able to stand up to any possible public scrutiny and further investigation if required.

The guidelines in this Code are based upon generally accepted standards of ethical business conduct and applicable laws. The absence of a guideline covering a particular situation does not relieve any of us from the responsibility of acting ethically and within the law. If ever unsure, seek advice from your leader or the Ethics Office.

Leaders

As a leader, you must ensure that activities within your area of responsibility are carried out in accordance with the Code and all applicable Corporate Policies. While each of us has a duty to follow the Code, our leaders have an even greater responsibility as they serve as advocates for the Code with their team members.

In addition to the aforementioned responsibilities, TELUS Digital managers (referred to as “leaders”) have a responsibility to:

- ▼ Be familiar with the Code as well as procedures and resources available to handle ethical inquiries, complaints or violations
- ▼ Demonstrate leadership by promoting and maintaining a climate in which honest, ethical and legal business conduct is the norm
- ▼ Ensure that annual Integrity training is completed by all team members and that violations of the Code are appropriately addressed
- ▼ Identify risks of non-compliance with this Code within their area of responsibility and take appropriate steps to address such risks
- ▼ Maintain a work environment that encourages open discussion and resolution of all ethical and conduct concerns without the fear of retaliation
- ▼ Maintain, without compromise, our ethical and other conduct standards in achieving goals, objectives and Customers First priority; and

- ▼ Use our performance review process to evaluate team members not only on the business objectives achieved but also on how they are achieved
 - ▼ Recognize team members whose behavior and actions demonstrate strong ethical decision-making and adherence to conduct standards

Team members with roles relating to internal controls over financial reporting and disclosure control

In addition to the above responsibilities, team members who have roles related to internal controls over financial reporting and disclosure controls have, as outlined in the Policy on Corporate Disclosure and Confidentiality of Information, the responsibility to make full, fair, accurate, timely and understandable disclosure in reports and documents that TELUS files with, or submits to, securities commissions and in other public communications made by TELUS Digital.

Members of the TELUS Digital Board of Directors

TELUS Digital Board members have the responsibility to notify the Vice Chair of the Board of any potential or perceived conflict of interest or other Code issues that arise during the course of their Board service.

Team members and Board members who represent TELUS Digital as directors on the boards of other organizations

In addition to the above responsibilities, TELUS Digital team members who represent TELUS Digital on the boards of other organizations have the responsibility to notify the Vice Chair of the Board (if they are a Board member) or the TELUS Digital Ethics Office of any potential or perceived conflict of interest or other Code issues which arise during the course of their service on the other organization's board. In providing such notice, team members should exercise due care to ensure that they act in compliance with their fiduciary and other obligations to the other organization and, for example, by not disclosing that organization's confidential information to TELUS Digital, without the prior written approval of that organization.

Ethics Office

The Ethics Office is established to provide team members with a resource regarding ethical and conduct matters. This office oversees the Code, conducts investigations, provides advice on ethical issues and conduct matters and develops and administers training for TELUS Digital's expected standards of business conduct. The office reports on its activities, including breaches of the Code, to the Human Resources Committee and the Audit Committee of the Board on a quarterly basis.

Integrity Work Group

An Integrity Work Group supports the Ethics Office in overseeing the Code and quarterly reporting to the Human Resources Committee and the Audit Committee of the TELUS Digital Board. Members of the Integrity Work Group include representatives from Human Resources, Law & Governance, and the TELUS Digital Security Office.

Ethical Decision Making & Reporting Issues and Concerns

This Code reflects our commitment to high standards of integrity and ethical behavior in our professional and business dealings. The Code is intended to support open and frank discussion as well as the satisfactory resolution of ethical dilemmas. We encourage “asking before acting.”

Each of us is responsible for ensuring our behavior is ethical and for taking the proper steps to resolve ethical dilemmas. The guidelines in this Code are provided to assist with ethical decision-making. However, as business becomes increasingly complex, the Code cannot provide guidance for every possible situation.

In situations where the right ethical behavior is unclear, or where there may be the appearance of a contravention of these guidelines, we support each other in seeking advice and clarification. If you are unsure as to the proper course of action to take in a particular situation, you should first discuss the situation with your leader or the applicable department identified in this Code. Team members should retain all documentation and save a written record of the guidance provided by their leader or members of other departments and any decision made in the event there is a future investigation with respect to a possible violation of the Code.

If you become aware of a possible violation of the Code, you are required to report it to the Ethics Office. For more information, please refer to the TELUS Digital [EthicsLine](#) section. Board members may also advise the Vice Chair of the Board of potential violations. The Vice Chair of the Board will refer the matter to the Ethics Office for investigation, resolution and reporting. Possible violation of applicable laws will be directed to Law & Governance for review and investigation.

Failure to act in accordance with the guidelines outlined in this Code may have consequences for the individual team members, may create potential harm to TELUS Digital's reputation and brand, and may put TELUS Digital at risk for civil or criminal liability. Individual consequences may include disciplinary action, up to and including possible termination of employment, as well as civil and criminal penalties. Therefore, please regard the requirement to understand and to act in accordance with the Code as a very serious obligation.

Waivers

It is not anticipated that there be any waivers to this Code. In the unlikely event that a significant waiver is considered and granted for the ELT member or a Board member, it must be received prior with written approval by the Board or a Board committee delegated with the authority to make such approvals. In such circumstances, any waivers granted to an ELT member or Board member must be promptly disclosed as required by securities laws, regulators, and pursuant to the Corporate Disclosure and Confidentiality of Information Policy.

In the unlikely event that a waiver is considered for team members other than an ELT member or Board member, full disclosure must be given and prior written approval must be granted by the Chief Legal Officer in advance of the initiation or continuation of the conduct in question and must be promptly reported to the Audit Committee of the Board.

1. Questions to Ask Yourself

Gather information and then determine if the situation you face is an ethical issue. The questions below may help to clarify your situation and ethical action.

- ▼ What is my immediate feeling about this?
- ▼ Does this comply with all TELUS Digital policies and procedures?
- ▼ Is this legal in the country I do business in?
- ▼ Does it comply with regulatory requirements in the country I do business in?
- ▼ Is this an expected part of my job?
- ▼ How would others perceive this action?
- ▼ Would I or TELUS Digital be embarrassed if this situation were discussed in the media?
- ▼ Would I be putting TELUS Digital or myself at unnecessary risk?
- ▼ What impact would this have on my or TELUS Digital's reputation?
- ▼ Is this taking revenue or customers away from TELUS Digital or otherwise negatively affecting TELUS Digital's interests?
- ▼ Does this affect my judgment or ability to act in the best interests of TELUS Digital?
- ▼ Does this benefit me or a person somehow related to me economically?
- ▼ Does it impact TELUS Digital economically or cost TELUS Digital money?

We rely on all team members to use good judgment to guide behavior and to ask questions in situations where the proper course of action may be unclear.

2. Talk to your Leader

Often your leader is in the best position to help you work through the issue. Your leader is responsible for supporting open discussion, working through the ethical questions and other issues you have that touch on the Code, and guiding your access to further assistance as required. However, you will have multiple avenues and options for reporting any concerns to management. In situations where you are uncomfortable talking with your leader, or your leader is unable to help, you should refer to the next level of leadership or seek expert assistance as detailed in the next section from the Ethics Office.

3. Seek Expert Assistance

If you have tried the above steps but still have questions, assistance is available through designated subject matter experts in Human Resources, Law & Governance, the Data Privacy Office, the TELUS Digital Security Office, the Ethics Office, & Finance.

4. Speaking UP - Raising Questions or Concerns 1-888-265-4112

Failure to follow the Code can put our business and our stakeholders - including our customers, fellow team members and shareholders at risk. For these reasons, all team members are obligated to speak up promptly if you become aware of a potential or suspected violation of the Code.

You may also contact the TELUS Digital [EthicsLine](#) to request ethical guidance or make a good-faith report about harassment, misconduct or a perceived violation of this Code, another TELUS Digital policy or

procedure, law, questionable business practices, potential fraud, concerns or complaints with respect to any accounting, accounting controls or auditing matter. Reports may be made anonymously. Making a report in good faith means your report is honest and sincere. It involves conscientiously reporting without any ulterior motives or personal vendettas.

A good-faith report alleging misconduct must be made promptly after the occurrence of a violation or perceived violation, or after a team member becomes aware of it. Failure to file a report promptly may negatively impact TELUS Digital's ability to evaluate, investigate or resolve the alleged misconduct resulting in potential harm to TELUS Digital, our stakeholders and our reputation.

The EthicsLine is operated by an independent company and is staffed 24 hours a day, seven days a week, by live operators who are fluent in multiple languages. EthicsLine operators document and forward reports to the Ethics Office for review following each call or web contact. Where the report involves accounting, accounting controls or auditing matters, EthicsLine operators forward the report directly to the Chief Legal Officer, who will, as appropriate, review and assess the seriousness of such report with one or more of the following individuals:

- ▼ the ELT
- ▼ the Data Privacy Office
- ▼ the Audit Committee of the TELUS Digital Board

The Ethics Office forwards complaints regarding the potential violation of laws to Law & Governance for review and handling.

Phone toll-free: 1-888-265-4112 in North America. See website for other international dialing instructions

Web: www.telus.ethicspoint.com or Cosmos

How the Ethics Office handles Complaints:

a.) Assessment of complaint

The Ethics Office will assess the nature of the complaint. The complaint will be reviewed under the direction of Law & Governance in appropriate cases. The following matters for which other remedies exist will not be investigated by the Ethics Office and will be redirected as follows:

- ▼ **Employment issues and Respectful Workplace issues** such as promotions, remuneration, reprimands, suspensions, dismissals, harassment, discrimination and retaliation or labor relations issues – the immediate leader or other members of leadership, Human Resources and the Law & Governance team and
- ▼ **Privacy-related issues** – Law & Governance the Data Privacy Office is engaged where a matter involves customer or team member privacy
- ▼ **Health & Safety issues** – Facilities
- ▼ Others may be redirected on a one-off basis as determined by the Ethics Office.

b.) Investigation

All complaints to the Ethics Office are taken seriously, escalated to the appropriate management team members, and investigated, in partnership with TELUS Digital Security where appropriate, in a timely manner. If substantiated, the complaint will be resolved through appropriate corrective action and/or discipline up to and including separation of employment. If you make a complaint and choose to identify yourself, you will be notified when the Ethics Office or its designee has completed its review. Every effort will be made to maintain the privacy and confidentiality for those who contact the Ethics Office or who are accused of a breach of this Code to the extent possible (although disclosure may be necessary in some cases to effectively conduct an investigation, take corrective action or support legal proceedings or otherwise as required by law and to the extent permitted by applicable law). At times, team members may be required to assist with internal or external investigations of alleged misconduct. We each have a responsibility to cooperate with these investigations and must never interfere with an investigation by altering or destroying related documents or evidence, failing to disclose important facts, or being dishonest in the investigation. It is expected that all reports to the Ethics Office will be made in good faith. Deliberately or recklessly making false complaints may result in disciplinary action up to and including termination of employment, without notice and for just cause (where applicable).

c.) Non-Retaliation/Whistleblower Protection

We support and encourage our team members to come forward to report their concerns to management in good faith, in order for the Ethics Office and other subject matter experts to investigate and allow for a proactive response to potential areas of concern. Retaliation or retribution against a team member for making a good faith report to the Ethics Office, or for assisting or participating in good faith in an investigation of a complaint, violates our ethical principles and will not be tolerated. If you feel you have been retaliated against after making a good faith report, you should contact Human Resources or the Ethics Office immediately.

d.) Opportunity to Respond

If it has been found that a team member has breached or has likely breached this Code or any other workplace rule or expectation, the team member will be informed of the complaint in due course, at an appropriate time in the investigative process. The team member will be provided the opportunity to respond and, where appropriate, to contribute to the correction of the breach.

e.) Reporting of Breaches

Any confirmed breach of the Code will be reported to senior leadership with recommendations for action. Ethical issues reported to the Ethics Office will be summarized quarterly and reported to the Human Resources Committee as well as the Audit Committee of the Board, together with the results of investigations, recommendations and action. The Chief Legal Officer will report significant complaints regarding accounting, internal accounting controls or auditing matters directly to the Chair of the Audit Committee of the Board.

f.) File Documentation

Records of the report and investigation, including contents of meetings, interviews, results of investigations and other relevant material, will be maintained by the Ethics Office in a separate file and managed in accordance with the TELUS Digital [Privacy Policies](#). Disclosure of information internally will be strictly limited to a need-to-know basis.

5. Last Resort Resolution

If an ethical issue remains unresolved, the Integrity Work Group is available as the body of last resort to discuss the issue and guide the resolution of any ethical issue brought forward. Every ethical issue referred to the Integrity Work Group will first be reviewed by a sub-committee of the Integrity Work Group to assess its merits and relevance. If the sub-committee determines, based upon a review of the evidence submitted, that the issue has not been reported in good faith but is frivolous and/or vexatious, or that it is made in bad faith, it may recommend to the Integrity Work Group that no further action be taken. The Integrity Work Group will review the recommendation from the sub-committee and make a decision whether to assess the merits of the issue or determine that no further action be taken.

Guidelines

Privacy and Confidentiality of Information

At TELUS Digital, we build trust with our stakeholders by using data in ways that generate value, promote respect and deliver security. Our reputation relies upon our unwavering commitment to earn and maintain our stakeholders' trust. TELUS Digital will only meet its legal obligations but will assess whether our uses of data reflect ethical, cultural, and social norms related to the reasonable uses of data, particularly personal information.

In carrying out the company's business, team members often learn confidential or proprietary information about the company, its customers, suppliers, or joint venture parties. Team members must maintain the confidentiality of all information so entrusted to them, except when disclosure is authorized or legally mandated. Confidential or proprietary information of the company, and of other companies, includes any non-public information that would be harmful to the relevant company or useful or helpful to competitors if disclosed. Every team member at TELUS Digital has an obligation to put privacy first when handling personal information and to comply with the privacy commitments we make to both our customers and team members. We're proud of the reputation we've built and the work we do at TELUS Digital to protect the privacy of our customers and team members. For more information about how we meet and exceed our privacy obligations, see the [TELUS Digital Privacy Page](#).

TELUS Digital also respects and protects the security and integrity of confidential information, whether the information belongs to TELUS Digital, other team members, contractors, suppliers, community partners, customers or competitors.

For example, team members are permitted to access supplier, partner, customer or team member personal information only when they have a legitimate business need to do so and may only use that personal information for that specific business purpose. Another example is that team members are not permitted to record workplace conversations or take photographs or videos in the workplace with a recording device or camera (including, but not limited to, a smartphone) without either obtaining prior consent from all parties included in the recording, photograph or video or without prior authorization from their leader and/or other TELUS Digital management, as consistent with applicable laws. Team members should contact their leader or the Ethics Office for further information about recording workplace conversations.

We recognize the transformative potential of technology innovations, including Artificial Intelligence (AI) and team members which use and deploy AI will do so in accordance with our corporate policies and practices. Responsible innovation helps us to serve our customers and communities better and will aid in our efforts to support a friendly future.

In addition to the TELUS Digital Policies, various business areas of the company may have additional supporting management practices in place. Refer to your leader for more information.

Case Study

Problem

My friend calls me knowing I work in a TELUS Digital center of excellence and asks me to look up the address and phone number of an end-user of a TELUS Digital customer since this information is not listed in the public directory. Should I look this up and provide the information?

Action

No. Unless you have a legitimate business reason to look up the information, you must not even access this end user's account and should certainly not provide the requested information to your friend.

Problem

My next-door neighbour is a good friend of the family of one of my former team members who now works for a different leader. My neighbour asks me how this team member is doing. I explain that he no longer works on my team and is away from the office on stress leave. Should I have discussed my former team member's status with a close family friend?

Action

No. It is not appropriate for you to discuss the status of your former team member even though you know your neighbour is a close family friend. Team members are reminded that it is inappropriate to disclose personal information of our team members for non-work-related purposes. Of particular concern is sensitive personal information such as health or financial information and information about disciplinary action. This is contrary to our [TELUS Digital Privacy Policies](#).

Problem

Today I had a challenging experience with a customer and I could not make them happy. I have my own blog on Cosmos and would like to post my experience so that I can get suggestions from my team members on how to handle similar situations. Should I post this?

Action

Soliciting feedback from your team members is an excellent idea; however, you should act cautiously. Even though you are posting this internally, you must protect the privacy of your customer. Review what you intend to post to ensure you are not inappropriately identifying your customer and discuss with your leader before posting.

Problem

My sister is in a marital dispute with her spouse. I know her spouse is an end-user for the TELUS Digital customer that I support. Is it acceptable to help her by looking up the calling and account details of her spouse?

Action

No. Unless you have a business reason to look up the information, you must not access this end user's account and should certainly not provide the requested information to your sister. Doing so would constitute a breach of privacy and would be considered a conflict of interest.

Problem

I have a friend who is starting a new business and has asked me for a list of TELUS Digital customers who might be interested in her services. Is it ok to provide a list of potential customers?

Action

No. Customer name and contact information is private and should never be shared with anyone outside TELUS Digital (or with anyone inside TELUS Digital who does not need the information to do their job).

Personal Integrity

Individually and collectively, our personal integrity supports the honest use of TELUS Digital resources such as time, funds, property and assets in dealings with co-workers and others and in delivering on our Customer First priorities. Business needs must take priority in the allocation of our time at work. Company time and resources, irrespective of where we work, are to be used for business purposes unless otherwise authorized by the appropriate leadership. While we respect the privacy and autonomy of our team members in their personal lives, their actions, both in the workplace and outside it, have the potential to negatively impact TELUS Digital's reputation.

Fraud

We have a zero-tolerance stance with regard to instances of confirmed fraud.

As team members, we will not engage directly or indirectly in fraud, including customer or end-user account falsification, abusive sales practices, expense fraud, time fraud, or any other fraudulent practices or reporting. If you are approached by anyone who you feel is or may be suggesting engagement in fraudulent activities, or if you are aware of situations that may involve fraud, you must report the incident to your leader or contact the Ethics Office. Examples of fraudulent or otherwise improper activity include:

- ▼ Altering company records, submitting false information, or misappropriating account information to meet objectives/earn incentive payments
- ▼ Adding or modifying products, services or account information (including, but not limited to contact information or banking account information) on a customer's or end user's account without their knowledge, understanding or authorization
- ▼ Presenting false medical information for sick leave or disability benefits or participating in any activities, including travel, that is inconsistent with your medical restrictions and limitations

- ▼ Falsely reporting time worked or vacation used to earn more pay or to avoid discipline for being late or absent from work
- ▼ Submitting fraudulent benefits claims to TELUS Digital's service providers
- ▼ Theft or misuse of customer, team member or company data
- ▼ Misuse of Corporate credit card for personal transactions

Travel & Expenses

TELUS Digital funds may only be used for legitimate business purposes. We must follow TELUS Digital policies regarding allowable expenses, expense limits, the use of corporate credit cards, preferred travel vendors, management approvals, receipts, expense reports and other travel-related matters and we are expected to truthfully, accurately and completely record our travel expenses in a timely manner.

Compliance with Domestic and Foreign Laws

We comply with all applicable governmental laws, rules, and regulations including, but not limited to laws, rules and regulations related to securities, labor, employment and workplace safety matters. Team members should understand and comply with the laws, rules, and regulations that relate to their work. Team members should seek guidance whenever they are in doubt as to the applicability of any law, rule or regulation or regarding any contemplated course of action. It is the responsibility of leaders to ensure that the members of their team are aware of their responsibilities in this regard and to seek advice from Law & Governance, Human Resources, or Tax if they are unsure, especially for transactions that cross international borders or involve foreign laws.

Team members should be aware that many countries have laws, rules, and regulations that regulate the import and export of goods, services, software and technology for a variety of reasons, including national security and foreign policy.

Any violation of applicable laws, rules or regulations by any team member should be reported immediately to the Ethics Office.

Contributing to our Communities

We are committed to supporting the communities where our team members live and work. We encourage team members to support our communities by volunteering and participating in charitable activities, such as the TELUS Digital Days of Giving ("TDOGs").

While representing TELUS Digital and contributing to our communities, we must:

- ▼ Adhere to the TELUS Digital values and uphold the standards in this Code to ensure we always represent TELUS Digital in an ethical manner
- ▼ Ensure that these outside activities do not interfere with our job performance or create a conflict of interest

- ▼ Obtain proper approval by the ELT before donating TELUS Digital funds or making contributions in TELUS Digital's name
- ▼ Make it clear that the views expressed through our participation in community activities are our own personal views, not those of TELUS Digital.

Fair Dealing

We consciously and purposely apply high standards of courtesy, professionalism, fairness and honesty when dealing with team members, partners, suppliers, customers and competitors. None should take unfair advantage of anyone through manipulation, concealment, collusion, abuse of privileged information, misrepresentation of material facts or any other practice involving unfair dealing. If a competitor or a customer attempts to discuss subjects that raise competitive concerns, we are expected to refuse to do so. We will report unethical practices to the Ethics Office or through the TELUS Digital [Ethics Line](#).

Bribes and Facilitation Payments

We strictly prohibit any form of facilitation payments or other types of bribery, gifts and benefits that are illegal, improper or otherwise outside TELUS Digital's acceptable guidelines, including kickbacks and extortion. Team members are prohibited from participating in these types of activities in any way either directly or indirectly through an agent or third party. Local customs do not provide an exception to this requirement. Team members should be aware there are national and international laws regarding bribery and corruption that apply to TELUS Digital and have significant potential civil and criminal penalties for violations.

Further guidance on identifying and avoiding facilitation payments, bribes and other forms of improper payment or benefit activities is provided in the [Anti-Bribery and Corruption Policy](#).

Money Laundering and Terrorist Financing

TELUS Digital does not engage in money laundering or terrorist financing. TELUS Digital does not permit money laundering, the funding of terrorism and/or other criminal activities. Money laundering is attempting to conceal the true origins of funds originating from criminal activity. Everyone at TELUS Digital must obey laws prohibiting money laundering and report any suspicious activity or behavior to the Ethics Office.

Protection of Third-Party Confidential Information

We do not improperly seek corporate trade secrets or confidential information belonging to others. If we receive unsolicited information that appears to be another party's corporate trade secrets or confidential information without the owner's consent, we will immediately inform our leader and will not copy, distribute, or use it until we have obtained guidance from our leadership and/or Law & Governance. Team members or contractors who have worked for a partner, supplier, customer or competitor will not be requested to provide confidential information about that party. This does not preclude gathering information with the owner's consent or from the public domain. TELUS Digital respects and protects the security and integrity of confidential information, whether the information belongs to TELUS Digital, other team members, contractors, suppliers, community partners, customers or competitors.

Lawful Competition

We are fair in what we say about others' products and services and we are committed to lawful competition based upon the merits of our products and services and do not support any agreements or actions that restrict or impede fair competition in contravention of applicable law. Competition (antitrust) law is complex and global in reach, and its application depends on the facts of a particular case. Team members should exercise extra caution if they work in roles that have a higher risk for violating competition laws, including, sales, marketing, pricing determination, and if they are in a senior leadership position. Activities with heightened competition law risks include:

- ▼ establishing terms and conditions as well as pricing and promotional strategies for TELUS Digital products and services
- ▼ developing advertising materials for TELUS Digital products and services
- ▼ negotiating, communicating or interacting with competitors
- ▼ handling or using data about competitors
- ▼ participating in trade associations that include competitors as participants, or
- ▼ selecting or negotiating with vendors.

Team members performing these functions should consult with Law & Governance to ensure they are appropriately educated and trained with respect to competition law, and that they receive appropriate advice and specific guidelines to address relevant competition law issues that are applicable to their situation. Team members are also required to report to Law & Governance any contravention or suspected breach of competition law requirements. In addition, it is often essential to involve Law & Governance early in the process of developing new commercial initiatives or the engagement of new personnel, given the many uncertainties that can arise in the application of this area of law.

Dealing with Governments

TELUS Digital values its relationships with governments at all levels. Team members dealing with governments and government officials must be aware of legal, regulatory and policy requirements in such areas as lobbying, gifts and benefits, conflict of interest, bribery and corruption, hiring ex-government employees and procurement processes. Team members should refer to the [Anti-Bribery and Corruption Policy](#) for further details.

Case Study

Problem

We recently hired someone who held an executive position with one of our competitors. This person was deeply involved in planning the competitor's expansion strategy and has information that would be very valuable to us. Can we ask her to disclose confidential aspects of this information?

Action

No. The new team member has an obligation to protect her former company's confidential or proprietary information, just as you would be obliged to protect the confidential or proprietary information of TELUS Digital if you were to leave the company. You must respect the team member's personal integrity as well as her obligation to her former employer.

Problem

I have become aware that a team member is disclosing third party (competitors, suppliers, customers, etc.) confidential information to other TELUS Digital team members. What should I do?

Action

Report this to your leader and the [EthicsLine](#) immediately. TELUS Digital's reputation could be significantly harmed by such disclosure, and this could also expose TELUS Digital to potential legal action. Taking immediate steps to contain the confidential information is critical.

Problem

I am travelling abroad later this month for work and need to get a work visa quickly. The person processing my request at the embassy has said that they can speed up the process if I pay a small fee in cash. Is this okay?

Action

It depends. If it is an official fee that the embassy charges for published “fast-track” services, payment of this fee would be O.K. However, if it is a payment to the person processing the request, then it is a bribe and prohibited. You must ask for a receipt or other official documentation as proof that the fee is legitimate. If the person will not provide any official documentation for the payment and you are uncertain whether it is legitimate, you should first consult with your leader or the Law & Governance team.

Political Activities

It is important to separate personal and organizational political activity. Team members may, and are encouraged to, participate in the political process on their own time and at their own expense. However, without the necessary prior and express TELUS Digital approvals, TELUS Digital cannot be associated with personal political activities, including political contributions. For more information, please see the [Anti-Bribery and Corruption Policy](#) and the additional information on political contributions therein.

Charitable Donations

All charitable contributions made by or on behalf of TELUS Digital must be approved by the ELT and recorded in accordance with the established approval process and guidelines, which include compliance with all applicable laws, this policy and other related policies including the [Anti-Bribery and Corruption Policy](#).

Proprietary Rights and Assets of Others

We respect the proprietary rights and assets of others. These include both tangible properties and intangible assets such as those protected by intellectual property rights. We respect licenses and conditions of use that apply to the intellectual property of others. Copyright materials are not copied in whole or in part or used in violation of any law or agreement with vendors, licensors or any other party.

Involvement in a legal matter

If you are involved in a legal matter, whether of a civil, criminal or regulatory nature, that has the potential to affect your ability to perform your job or harm the reputation or interests of TELUS Digital, you must immediately inform your leader.

If a team member comes across a suspected illegal activity or material (e.g. child pornography) in the course of their work, they should report it immediately to the TELUS Digital Security Office, which will determine the appropriate course of action, such as reporting it to the appropriate authorities.

Improper Influence on the Conduct of Audits

Team members, or any person acting under the direction of a team member, are prohibited from directly or indirectly taking any action to improperly influence, coerce, manipulate or mislead TELUS Digital's external or internal auditors or their representatives.

Respectful Workplace / Human Rights

At TELUS Digital, all team members are expected to act professionally and respectfully and intervene or seek support to minimize and resolve unacceptable behavior impacting the workplace.

At TELUS Digital, we are committed to treating all current, potential and past team members, as well as all partners, suppliers, shareholders, and customers with dignity, respect and fairness in a non-discriminatory, harassment-free and non-retaliatory manner.

When team members experience or become aware of unacceptable behavior, including as a bystander, they have a responsibility to report it to their leader and/or Human Resources. TELUS Digital will address the behavior confidentially and in a timely manner, in accordance with applicable legislation and TELUS Digital policies, to restore a physically and psychologically safe workplace.

Because of their influence and authority, leaders are responsible for modeling the highest standards of behavior, taking action to prevent and resolve unacceptable behavior, and setting the tone for healthy workplace interactions. When a complaint is shared with a leader, the leader is responsible to notify the Human Resources for guidance on addressing the issue.

A failure to meet these expectations may result in disciplinary action up to and including dismissal for just cause. Team members are encouraged to contact their leader or Human Resources if they have any questions about their rights or responsibilities.

Discrimination

TELUS Digital is committed to a workplace that is positive, professional and inclusive. Every team member has the right to a workplace that is free of unacceptable behaviors and has the obligation to treat others in the same manner. Unacceptable behaviors include discrimination and harassment based on a prohibited characteristic (e.g., race, national or ethnic origin, color, religion, age, sex, gender identity or expression, sexual orientation, marital status, family status, genetic characteristics, or disability) bullying, retaliation and violence.

For the purpose of this section, TELUS Digital's "workplace" is not limited to TELUS Digital's business premises and is not limited to normal business hours. These terms also encompass any activities or events that happen outside of normal business hours or outside of TELUS Digital business premises but are linked to the TELUS Digital workplace and the team member's involvement with TELUS Digital.

Though the spirit of the law is the same, the human rights legislation that TELUS Digital companies are subject to may differ slightly, depending on which TELUS Digital company is involved and which jurisdiction it is operating in. For example, some of the grounds for discrimination and harassment may differ slightly from one jurisdiction to another. Details are provided in the Respectful Workplace Policy to which team members are referred for more information.

Sexual Harassment

Workplace sexual harassment is a form of discrimination and a violation of the Respectful Workplace policy. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, such as uninvited touching or sexually-related comments, when: (1) submission to the conduct is made either explicitly or implicitly a term or condition of an individual's employment; (2) submission to or rejection of such conduct is used as the basis for employment decisions affecting the person involved; or (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Although the list is not exhaustive, the following are examples of types of conduct that may constitute sexual harassment:

- ▼ Suggestive or lewd remarks, jokes or innuendoes of a sexual nature;
- ▼ Unwelcome sexual advances including, for example, requests for sexual favors or repeated offensive sexual flirtation or propositions;
- ▼ The display of sexually suggestive or explicit pictures or objects;
- ▼ Unwelcome physical contact including, for example, hugging, touching, pinching, kissing, or constant brushing against another person's body;
- ▼ Telling lies or spreading rumors about a person's sexual activity

Sexual harassment also includes harassment based on gender, sex, sexual orientation and gender expression. Sexual harassment does not need to be motivated by sexual desire to be unlawful or to violate this policy.

Harassing or sexually harassing conduct in the workplace – whether committed by supervisors, non-supervisory personnel, volunteers, or visitors – is strictly prohibited and will not be tolerated under any circumstances. Any employee who believes he or she has been a victim of harassment or sexual harassment should immediately report the matter to one or more of the following: his or her supervisor; Human Resources; or otherwise as set forth above under the EthicsLine or as described in this Code. Please note that you are not required to complain first to your supervisor if he or she is the individual whom you believe is harassing you.

Any claim of harassment or sexual harassment will be promptly investigated by TELUS Digital. The matter will be handled expeditiously with the utmost discretion, and confidentiality will be maintained to the extent reasonably possible. If TELUS Digital determines that harassment or sexual harassment has occurred, appropriate measures will be taken promptly to resolve or correct the situation. These measures may include counseling, reassignment, reprimand, suspension, demotion, or other disciplinary action up to and including immediate separation of employment without notice for cause (where applicable), of any offending personnel.

Valuing Diversity and Inclusion

We believe that our team members are our greatest asset. TELUS Digital's commitment to diversity and inclusion (D&I) is at the core of our culture, embedded in our values and central to our leadership in social capitalism. We recognize that in all areas of our business, different perspectives, experiences and backgrounds bring innovative ways of thinking that help us drive better decision-making, insights and solutions. We are all responsible for helping maintain a workplace where everyone feels valued and encouraged to contribute – an environment where all of us have an equal opportunity to succeed.

Our commitment to inclusiveness includes the provision of workplace accommodation related to protected human rights grounds in accordance with the law to permit qualified persons access to meaningful work. Examples of accommodation may include physical or technical changes to work stations and changes to work duties. Team members are also referred to the team member handbook for more information.

Health and Safety

We are committed to having healthy and safe operations in all of our locations to protect the lives and health of our team members, to protect our assets, to ensure business continuity and to engender public trust. When working on customer premises and public locations, we prioritize team member safety and take necessary steps to safeguard the rights and safety of the customer, the public and ourselves.

Team members must be fit for work at all times during working hours and when operating company vehicles or equipment.

We monitor progress towards our objective of preventing injuries, illnesses and incidents and continually assess and improve, where appropriate, our health and safety programs. We have operating standards, practices, systems and resources to implement the health and safety standards.

We are expected to report to, and to remain fit for work, without any limitation due to the effects of alcohol, cannabis or other drugs, including prescription or over-the-counter medication, or any other mood-altering substance, so that our ability to perform our job is not weakened, diminished, or adversely affected in any way. The company will engage in an interactive dialogue with any employee whose lawful prescription drug use may impede or interfere with the employee's performance of the essential functions of the job, in compliance with applicable laws. Our actions with respect to the use of drugs, alcohol, and other mood-altering substances not only reflect on us as individuals but on TELUS Digital as a whole. Team members are referred to the team member handbook for further details.

TELUS Digital is committed to providing a safe and violence-free workplace for all team members. Workplace violence may include conduct such as bullying, cyber-bullying, teasing, abuse and other aggressive behaviors. Workplace violence is not only an employee health and safety issue, but also may be considered a criminal law issue. Consequently, workplace violence will not be tolerated and every incident will be investigated promptly, and the company will take appropriate remedial measures. Team members are referred to the team member handbook for further details.

Voluntary Employment

All employees' work is voluntary. In the United States, TELUS Digital is an "at-will" employer, and absent an employment agreement to the contrary, employees may choose to terminate their employment at any time (subject to required notice where applicable). TELUS Digital does not use forced, bonded, or indentured labor practices or child labor in any part of our business operations and complies with statutory and local requirements for the minimum age of employment.

Employment Standards

Compensation paid to employees complies with all applicable employment standards, including those relating to minimum wages and overtime premium pay. Where no statutory employment standards exist, employees are paid at least the minimum local industry standard. Deductions from wages as a disciplinary measure are not permitted.

Environment & Sustainability

TELUS Digital's values are demonstrated by our compliance with applicable environmental legal requirements, our actions to continually improve our environmental performance and build a sustainability culture. Team members are encouraged to consider economic, social and environmental factors in their day-to-day strategic planning, decision-making and operations.

Case Study

Problem

A co-worker and I had a disagreement in the workplace. We are Facebook friends, as are several of our peers, and I began seeing posts where they are making negative comments about me and calling me a loser. Could this be seen as cyberbullying?

Action

Yes. Comments such as these are considered cyberbullying, and are unacceptable. Cyberbullying can be in the form of, but not limited to, offensive email, email threats, posts, comments or spreading gossip on Social Media or work chat platforms. If you are experiencing or witnessing such behavior, you should speak to Human Resources or your leader.

Problem

You receive a text from your leader after working hours complimenting you on how attractive you are and asking about the qualities you look for in a companion. You are very uncomfortable with the content of the text but you worry there may be retaliation or a negative impact on your career if you tell your leader the text is inappropriate and unwanted. What should you do?

Action

The leader's actions are unacceptable and fall within the definition of workplace sexual harassment. The Respectful Workplace Policy applies to all activities both during and outside business hours that could have an adverse impact on the TELUS Digital work environment. All team members have the right to a safe and harassment-free work environment. Regardless of the level or job title of the person engaging in harassment, you should contact the Respectful Workplace Office or the Ethics Office for guidance. Retaliation against a team member who makes a complaint or reports an alleged policy breach in good faith is strictly prohibited.

Problem

You just left a team meeting and are having an informal conversation with a co-worker about a number of action items assigned to each of you. In referring to your openly gay director, your co-worker says, "John acted like a total princess today."

Action

Your co-worker's comments are unacceptable and represent a form of sexual harassment. Sexual harassment is not just confined to sexual interest but it also covers more subtle behaviors based on gender, sexual orientation, gender identity or gender expression. The comments are unwelcome, serve no legitimate business purpose and could cause harm. Although you were not the subject of the comment, all team members have an obligation to report unacceptable behaviors. You should contact Human Resources or the Ethics Office for guidance.

Problem

We use a staffing agency to employ TELUS Digital contractors to support the business and our customers. I received a complaint and have reason to believe that the agency is not paying its employees (i.e. TELUS Digital contractors) correctly, at least not according to the law. Should I care about this? After all, it is not my company and they are not our direct employees.

Action

Yes, you should care because failing to properly pay employees is inconsistent with TELUS Digital policies and values. In addition, such practices may create liability for TELUS Digital. If team members believe someone we work with is doing something wrong they should talk with their leader, or call the [EthicsLine](#).

Company Assets and Information

We take appropriate care to protect TELUS Digital assets against undue risks, exposures and liabilities.

Company Information

As team members of TELUS Digital, we have access to information about TELUS Digital that belongs to TELUS Digital and is used by TELUS Digital for its business. Unless specifically published for external use and public dissemination has occurred, all company records, information, intellectual property, reports, data, plans, processes and methods, including information posted on internal websites, are considered TELUS Digital information and should not be disclosed without proper authorization. Access should be limited to those team members with a legitimate business reason to know the information. Team members are referred to the Global Security and Risk Policies for further details on the classification and safeguarding of TELUS Digital's information assets.

Team members and past team members must not use or disclose TELUS Digital trade secrets, competitive information or other confidential and/or proprietary information to benefit themselves or others. In situations where we would be willing to share confidential information, Law & Governance can assist in preparing a confidentiality agreement or license agreement to protect TELUS Digital.

To protect the safety and integrity of our networks, only approved software is to be used on TELUS Digital equipment. No team member should knowingly install or use a software program or code that could damage TELUS Digital's information assets. All team members are responsible for taking reasonable measures to ensure that software and data is clear of malicious code and safe for use in TELUS Digital's electronic data processing environment.

Public Disclosure

TELUS Digital is subject to strict securities rules regarding disclosure of financial and other material information to the public. Selective disclosure of confidential information by any team member can create liabilities for TELUS Digital and for that team member. All discussions about TELUS Digital in a public environment should comply with the Policy on Corporate Disclosure and Confidentiality of Information, to which team members should refer to for further details.

Examples of situations that may lead to inappropriate public disclosure include:

- ▼ Participating in an investment-related discussion forum, social networking site, chat room, blog or bulletin board on the Internet. The team member must not discuss any confidential information about TELUS Digital when participating in these activities.
- ▼ Discussion regarding TELUS Digital with a member of the investment community or the media. All inquiries from these groups must be referred to those team members specifically trained and authorized to communicate on behalf of TELUS Digital.
- ▼ Presentations to business, educational or community groups. Team members invited to make such presentations should receive approval from the Communications team prior to accepting the invitation.
- ▼ For presentations to internal TELUS Digital audiences, team members should confirm with their leader if such presentations include confidential or sensitive information.

Business Records and Internal Accounting Controls

Accurate and reliable records are essential to enable us to meet our business, legal and financial obligations. We strive to ensure all records and other data (whether for external or internal use), are factual, complete, timely and understandable. Restricted and confidential information should be properly identified and respected as outlined in our [Global Security and Risk Policies](#).

TELUS Digital has defined processes for properly handling data and records throughout their lifecycle to comply with business needs, as well as legal and regulatory requirements. Team members should refer to the [Records Retention Policy](#) for guidance on the minimum and maximum retention periods, creating, collecting, using, retaining, storing and disposing of data and records, suspension of disposal due to a potential or ongoing legal matter or investigation and where to obtain further information. It is a violation of this Code as well as other TELUS Digital policies to create false or misleading company records or documents (including, for example, contracts, orders, timesheets, benefit claims, adjustments and expense statements).

Financial Transactions

All team members are expected to understand their role and responsibility for TELUS Digital's financial transactions and records and follow approved procedures to protect, report, control and accurately reflect these transactions. Team members are referred to the Signing Authority Policy and other TELUS Digital Finance policies for further details.

It is a violation of the employee expense policy to misuse company-issued credit cards or make misrepresentations on expense statements.

We also do not tamper with the network or systems to bypass billing and we do not make unauthorized charges or credits to customer accounts.

Team members whose duties involve authentication and approval are responsible for the close scrutiny and timely verification of all documents upon which monies are paid or received in compliance with TELUS Digital policies.

Safeguarding Assets

TELUS Digital assets can take many forms and we are responsible to protect them at all times, against loss, theft, damage, vandalism, neglect, unauthorized use and unauthorized disposal. Of note, if you are required to work out of the country, you must have security and leadership approvals in advance to ensure assets are protected at all times. Assets include, but are not limited to:

- ▼ **Informational assets** include data related to our business, like a database of customer names and contact details.
- ▼ **Financial assets** include money and other financial instruments.
- ▼ **Tangible or physical assets** include material things that enable us to do our jobs, like computers, mobile phones, supplies, tools, company vehicles, TELUS Digital facilities, information, and office supplies.
- ▼ **Intangible assets** include non-physical things like ideas, trademarks, patents, time and our reputation.

Team members are the first line of defense in protecting TELUS Digital's assets and information. Team members are expected to take reasonable measures to safeguard access credentials such as passwords, identification cards, keys, cards and hand-held user authentication devices. It is also important that we not share our TELUS Digital-provided devices or their access credentials and MFA tokens, and we do not compromise site security by leaving access doors open and unattended. Any suspected incident of fraud or theft must be reported to your leader or to the Ethics Office.

Intellectual Property

We work together to protect our intellectual property just as we protect other TELUS Digital assets and information as noted above.

Intellectual property rights enable TELUS Digital to be known and recognized in the market place and help distinguish our products and services from those of our competitors. Intellectual property rights also protect the valuable intangible assets generated or acquired by the TELUS Digital team. Examples of TELUS Digital intellectual property include brands and logos (trademarks); software, artwork, and marketing material (copyright); and inventions and business innovations (patents).

TELUS Digital owns all intellectual property created by its employees and contractors and ownership of such intellectual property is documented. Unless specifically published for external use and/or public dissemination has occurred, all company records are considered TELUS Digital information and should not be disclosed without proper authorization.

Team members should contact Law & Governance for further information about intellectual property matters or the Brand Office for information on the use of our brand. Additionally, team members who are served with any TELUS Digital legal matters should contact Law & Governance.

Personal Use of Communication Devices

In our future friendly world, communication equipment and devices (TELUS Digital's or our own) are used for both business and personal purposes. Electronic communication may occur via a wide range of devices including, but not limited to, computers, telephones, smartphones, and webcams. This can take the form of emails, texting, Internet searches, photographs, videos, audio files, blogs, social networking, peer-to-peer file transfers and physical exchange of media (e.g. USB storage devices).

As we communicate in any of these ways, we may identify ourselves as TELUS Digital team members either by naming TELUS Digital or by virtue of email or IP addresses.

Use of TELUS Digital-provided communications equipment and devices should not interfere with our duties or negatively impact TELUS Digital in any way. We expect any personal use to take place on non-work devices during personal time, or during reasonable permitted breaks from work, subject to your leader's approval and the needs of the business.

Team members must comply with all TELUS Digital policies when using TELUS Digital-provided communication devices. We are responsible for all of our actions while using such devices. Team members should refer to the [Global Security and Risk Policies](#) for further information.

TELUS Digital uses automated tools to log team member use of its networks (e.g. voice, email, messaging, Intranet and Internet) and related equipment and devices and to monitor traffic (including content) on its networks in order to detect security threats and other problems. While TELUS Digital does not actively monitor employee email, messaging, telephone and Internet access, TELUS Digital does reserve the right to do so, and team members should have no expectation of privacy while operating TELUS Digital devices. Note that improper use of TELUS Digital's networks, equipment or devices may result in disciplinary action up to and including termination of employment without notice and for cause (where applicable).

Case Study

Problem

I would like to search for a new car on the Internet and compare notes with friends on a social networking site. Is this allowed from my workstation?

Action

It depends. Reasonable personal use of your TELUS Digital-provided communication equipment or device to access the Internet is allowed provided it complies with our policies, is carried out during personal time or permitted breaks, does not interfere with your work or negatively impact TELUS Digital in any way. Remember that business needs must take priority in the allocation of our time at work.

Use of Social Media

At TELUS Digital, we embrace and utilize social media channels in our business and understand that social media can be a fun and rewarding way for our team members to share life and opinions with family, friends and co-workers around the world. Additionally, use of social media carries with it certain responsibilities. Team members must comply with our Social Media Guidelines, use good judgment and be polite, respectful, and mindful of the content created, shared and posted, remembering that the Internet is a public place.

As a TELUS Digital team member, you should adhere to the following:

- ▼ Do not discuss TELUS Digital's or our customers' products or services on social media, whether you've identified yourself as a team member or not. This includes posting (anonymously or not) on an internet blog site, or on social networks. Doing so can result in legal ramifications for the business or yourself or appear as biased
- ▼ Use common sense when offering personal opinions to avoid subjecting either TELUS Digital or yourself to legal action. To help avoid confusion, and depending on the circumstances, it may be appropriate to add the following statement to your social media bio: "the views expressed are mine alone and do not necessarily reflect the views of my employer."
- ▼ Do not disclose information that is confidential to TELUS Digital or provided in confidence to TELUS Digital, including client names, internal communications, or financial information until the information has been made public by TELUS Digital
- ▼ Show respect towards other persons and organizations and avoid defamatory, discriminatory, bullying or harassing messages
- ▼ Avoid offensive content of any kind, including pornography and materials promoting violence, discrimination or hatred
- ▼ Any new social media handles that you create must be personal only and not include the TELUS Digital name or branding in the handle, bio or content. Only the Brand Marketing and Social Media team is authorized to create new, official accounts for the business
- ▼ Do not display the TELUS Digital logo or brand images in personal communications or as background images on your profile without written permission from a senior leader or the Brand Office. We do, however, encourage team members to follow, retweet, and or share approved content from the official TELUS Digital social media handles.

For additional information regarding our team member policies, you can visit the team member handbook.

Case Study

Problem

While browsing Facebook, you come across a thread where people are discussing TELUS Digital customers and services. Some comments praise the business for its service and others are criticizing it. What should you do?

Action

Unless you are an authorized TELUS Digital spokesperson in this forum, you should not be discussing TELUS Digital customers and services online. You may expose yourself and TELUS Digital to unacceptable risk since you may inadvertently disclose confidential information by defending the company or be viewed as speaking on behalf of TELUS Digital when you have not been authorized to do so. For more information, see the social media policy in the team member handbook.

Problem

Today when handling an end-user interaction, I felt like I had a connection with the end-user and would like to contact them to see if they are interested in meeting/talking. Is it ok for me to do this?

Action

No, customer and end-user information is private and for work purposes only. It should never be used for personal, non-work related matters, including sending them social media invites (including, Facebook or Instagram invitations).

Problem

Your manager asks you to open a new TELUS Digital Instagram account to highlight your team's and their customers' products and services and team culture. What do you do?

Action

Any new social media accounts for TELUS Digital must be approved by the Brand Marketing Team prior to being activated.

Conflict of Interest

WHAT it means

As team members, our first business loyalty must be to TELUS Digital. We must avoid situations or relationships that conflict with the interests of TELUS Digital and our duties to TELUS Digital. A conflict arises whenever we allow, or appear to allow, personal interests or relationships to impair our judgment and ability to make work-related decisions with integrity and honesty.

WHY it matters

By thinking of ourselves first, we may act in a way that is damaging, or potentially damaging, to TELUS Digital. We may also harm our personal reputation. In such circumstances, team members must take action to eliminate the conflict of interest or the perception of a conflict of interest.

HOW we do it

We make business decisions based on what is in the best interest of TELUS Digital and not our own. As team members, we must disclose actual or potential conflicts of interest to our leader. Each situation must be considered individually based and regularly reviewed on the parties involved, level of access to business information, decision-making authority, job duties/responsibilities, position within the organization and potential impact on others. If team members find themselves in a conflict or are unsure of whether a situation would be deemed to be a conflict of interest, they should complete a “Conflict of Interest Disclosure Form” available on Cosmos and submit it to the Ethics Office. Remember, having a conflict of interest is not necessarily a Code violation, but failing to disclose it is.

The following is intended as a guide in those areas in which conflicts of interest often arise. It is not intended to be definitive or all-inclusive, as guidelines cannot cover every situation that could give rise to a conflict of interest.

Family Members and Personal Relationships

A conflict of interest may occur when a team member has the ability to enhance or promote the interests of a family member. Conflict of interest may occur when a team member or family member gains a personal benefit from: (a) a business relationship with TELUS Digital, or (b) an outside business with which TELUS Digital has a relationship such as a partner, supplier, customer, competitor, contractor, consultant, agent, or dealer.

For the purposes of this part of the Code, “Family member” is defined as a spouse (including a common-law spouse and/or same-sex partner), child, stepchild, parent, sibling, niece, nephew, aunt, uncle, cousin, grandparent, grandchild, in-law (including mother-in-law, father-in-law, son-in-law, daughter-in-law, sister-in-law and brother-in-law). It also includes close personal friendships and any person (other than domestic employees) residing in the same household as the TELUS Digital team member.

Situations may arise where broader familial relationships, friendships and other close personal associations (e.g. persons residing in the same household as the TELUS Digital team member) cause real or perceived conflicts of interest or the possibility of real or perceived improper influence. Team members should be sensitive to these concerns and demonstrate good business judgment in the best interest of TELUS Digital and in keeping with the spirit and intent of this Code. Any uncertainty should be discussed with the appropriate Human Resources business partner or with the Ethics Office.

TELUS Digital Board members must disclose any family or personal relationship with TELUS Digital team members or with TELUS Digital job applicants to the Chair of the Corporate Governance Committee of the Board in order that the committee may determine whether the relationship impacts the Board member's independence.

Board members, the ELT and officers have a duty to disclose whether they have a relationship with TELUS Digital's external auditor.

Corporate Opportunities

All team members owe a duty to TELUS Digital to advance its interests when the opportunity arises. Team members are prohibited from taking for themselves personally or for the benefit of friends or family members opportunities that are discovered through the use of TELUS Digital's assets, property, information, or position. Team members may not use TELUS Digital's assets, property, information, or position for personal gain or benefit including for the gain or benefit of friends or family members. In addition, no team member may compete with TELUS Digital. This personal benefit may arise from an ownership interest in, or a role as a director, officer or employee of, an entity that is engaged in a business relationship with TELUS Digital.

This guideline does not prohibit team members from holding publicly traded shares of an entity with which TELUS Digital has a business relationship or a competitor. This is provided that the team member does not have a significant investment in the entity and does not acquire the shares based on material undisclosed confidential information obtained as a result of employment with TELUS Digital or by being a Board member of a TELUS Digital company.

To prevent conflicts of interest, team members may not:

- ▼ be involved in any negotiations or transactions on behalf of TELUS Digital with partners, suppliers, customers, contractors, consultants, agents, or outside parties where the team member has a personal, commercial or financial interest in the outcome of the negotiations, or transactions unrelated to their role at TELUS Digital.
- ▼ participate in a decision to hire, transfer or promote a family member, or someone with whom they have a romantic or sexual relationship, or be in a position of direct or indirect influence over a family member who is an employee or contractor of TELUS Digital. Team members recommending the hire of an employee or retainer of a contractor must disclose any current or past relationships, both professional and personal.

- ▼ supervise a family member nor have direct or indirect authority over employment or contract-related decisions that impact a family member or someone with whom they have a romantic or sexual relationship, such as pay, performance ratings, work assignments, discipline, training or termination.
- ▼ access or make adjustments to their own accounts or services of family members, friends, co-workers or acquaintances without authorization from their leader. Team members may only do so if specifically authorized by trouble ticket or customer order and authorization is gained from their leader.

Ethical Sales Practices

Team members share a commitment to delivering on our Customers First priority, which includes being consistently mindful of our professional conduct and ethical sales practices. We need to ensure when selling to a customer, that we provide the customer options that will allow them to make informed choices on the products and services that best meet their needs. We do not direct customers to sales that are not aligned with their requirements and we do not make any changes or modifications to their account without their consent, understanding and permission. Team members who are involved in selling or attempting to sell to existing and potential customers in the private or public sector, share a commitment to conduct business lawfully and with integrity,

Outside Employment and Other Non-TELUS Digital activities

As team members, we are free to engage in outside activities, including business activities, on our own time. However, these activities must not conflict, or have the potential to conflict, with TELUS Digital's best interests or with our obligations to TELUS Digital, including our ability to perform our job for TELUS Digital. As a general guideline, team members may not work for, or be engaged in activities for, enterprises that are competitors or suppliers of TELUS Digital. A conflict may arise by virtue of a role that we have with another company or organization, for example as a director, officer or employee of an entity that enters into a business relationship with TELUS Digital, even where there is no personal benefit or gain to us from the outside relationship. A conflict may also arise if, for example, we use assets such as time, our corporate phone or laptop, or tools paid for or developed by TELUS Digital, when engaged in such outside business activities. If you are considering starting your own business, accepting a second job, or joining a Board of Directors, you are required to advise your leader to ensure there is no conflict of interest. Of note, a second job cannot run simultaneously with your expected working hours at TELUS Digital.

It is a conflict of interest to have outside interests or responsibilities that demand so much time and energy that they interfere with our ability to complete our TELUS Digital work in a timely and high-quality manner.

This could include any personal, community and charitable activities that require time and effort during normal working hours, except for situations where the individual is acting in a representative capacity at the request of TELUS Digital with the explicit and written permission of their leader.

Circumstances change, and a conflict may arise even where your leader has previously approved a relationship with an outside party. It is your responsibility to be attentive to these potential conflicts and to report them to your leader as they arise. In order to fulfill your obligations under this Code, you may need to step down from the outside role or make other arrangements acceptable to TELUS Digital.

Future TELUS Digital Business

Over time, TELUS Digital may expand into new businesses or change its product lines or services. Team members are responsible for re-examining their individual situations on a regular basis to avoid becoming involved in a conflict of interest situation where no such conflict previously existed.

Information

Team members may not disclose or use for any personal reason, including personal gain, any confidential information (including competitive intelligence) obtained through employment with TELUS Digital or by being a board member of a TELUS Digital company.

Insider Trading

As detailed in the TELUS Digital Insider Trading Policy and the policy on Corporate Disclosure and Confidentiality of Information summarized here, team members may not trade in shares or other securities of TELUS Digital or any other company while in possession of undisclosed material information relative to the company whose securities are being traded. Nor may team members inform any other person, including their family, of any undisclosed material information except in very limited circumstances. Material information in respect of a company is information that could reasonably be expected to have a significant effect on the market price or value of any securities of that company. Please see the TELUS Digital Insider Trading Policy and Corporate Disclosure and Confidentiality of Information for more information. Failure to comply with these policies and with securities laws in this area will expose you personally, as well as TELUS Digital, to liability.

Case Study

Problem

I am a member of a team working on a part of the quarterly financial results. In the course of my work, I regularly see the draft package of all the results before they are approved for release. One evening, my neighbor asks me, "How is TELUS Digital doing these days?" In this casual conversation, is it acceptable if I answer, "Well, I can tell you one thing: the results are really good this quarter."

Action

No, this is not acceptable. This information is not yet public and therefore it should be regarded as confidential and/or proprietary TELUS Digital information. In addition, if this information is material (i.e. would reasonably be expected to have a significant effect on the value or price of TELUS Digital shares), you would be engaging in "tipping" in violation of securities law in the United States and Canada which may subject yourself or the company to criminal liability and is a violation of the Policy on Corporate Disclosure and Confidentiality of Information.

To prevent conflicts of interest, team members may not:

To determine if you have a conflict of interest that should be disclosed, ask yourself these questions:

- ▼ Do my outside interests influence, or appear to influence, my ability to make sound business decisions for TELUS Digital?
- ▼ Do I stand to improperly benefit from my involvement in this situation?
- ▼ Does a friend or relative of mine stand to improperly benefit?
- ▼ Could my participation in this activity interfere with my ability to do my job at TELUS Digital?
- ▼ Is the situation causing me to put my own interests ahead of TELUS Digital's interests?
- ▼ If the situation became public knowledge, could it negatively reflect on me or TELUS Digital?

If you answered “yes” to any of the above questions, discuss the situation with your leader or the Ethics Office.

Case Study**Problem**

I work in a senior marketing position at TELUS Digital and operate my own business after hours. Though I use my marketing skills, the business in no way competes with TELUS Digital business and does not affect my ability to perform my duties at TELUS Digital. I started small, working out of my basement, but my business is gradually generating more and more revenue. I am considering hiring a part-time manager, as I am not ready to leave my full-time employment. Once my own business can pay me as much as TELUS Digital does, I will devote my full attention to it. I have the best of both worlds - a salary from TELUS Digital and a blossoming business for future security. Is this a conflict of interest?

Action

No. Since TELUS Digital is not currently in the same line of business as your company, you are operating ethically, and it is not a conflict of interest as long as it remains an after-hours pursuit and does not interfere with your ability to perform your job for TELUS Digital to the best of your abilities. If, however, TELUS Digital decides in the future to enter the same line of business that your company is in, you will be in a conflict of interest position, even though you were in that business first. You must then decide which of your two interests, your own company or your employer's, will receive your full attention. Note, as team members we are expected to fulfill our TELUS Digital job responsibilities during our paid TELUS Digital time, irrespective of where we work.

Problem

I recently married the owner of a local call center offering competitive services. We have agreed not to talk about our days at work. Recently, my leader advised me that I could be in a conflict of interest position. What should I do?

Action

You are in a situation that may leave the impression of a conflict of interest. Even though you and your new

spouse have decided not to talk about your business lives, people outside the marriage—including your employer—may perceive you to be in a conflict of interest position. You should discuss your situation further with your leader and the Ethics Office as necessary and identify the extent to which your access to TELUS Digital's information could benefit your spouse's company and develop alternatives to avoid any appearance of a conflict of interest.

Problem

I support digital services for TELUS Digital's small and medium-sized business customers. With the growth of digital services, the demand for my expertise is booming. Can I take advantage of this opportunity and start up a consulting business on my own time?

Action

No. You cannot engage in any outside activity that might take business away from TELUS Digital. This would be considered a conflict of interest.

Problem

While at lunch, I overheard a conversation between two other TELUS Digital team members regarding TELUS Digital's plans to make a minority investment in a software company that develops communications software. Can I buy shares in the software company or suggest to my spouse that she do so?

Action

No. Although you found out about TELUS Digital's planned investment by accident, you are prohibited from buying shares by virtue of the fact that you are a member of the TELUS Digital team. Your spouse is also prohibited because she would be obtaining information about the proposed investment from you, a TELUS Digital team member. However, you and your spouse will be able to buy shares when TELUS Digital's investment in the software company becomes publicly disclosed.

Problem

As an account manager with TELUS Digital, I am responsible for managing several customer accounts. I have known the owner of one of my customer accounts since we were kids and have always maintained a close personal relationship. I have no personal, commercial or financial interest in my customer's business. Is there still an appearance of conflict?

Action

Yes. Although you may not have a personal, commercial or financial interest in the outcome of your customer's business, there may still be an appearance of bias or preferential treatment towards their company. You must eliminate the perception of conflict of interest by disclosing the relationship to your leader and removing yourself from managing this account. In addition, this same conflict of interest exists if you are managing an account that a family member may own/operate.

Problem

I am a customer service manager with TELUS Digital and my nephew is seeking employment as a human resources professional with TELUS Digital. Am I able to recommend him for employment?

Action

Yes. To avoid a conflict of interest, you should have no involvement in the selection decision. However, you may provide a written personal reference to the appropriate Human Resources recruiter in which you mention that you are the applicant's relative.

Gifts and Benefits

TELUS Digital team members shall not authorize, offer or accept, directly or indirectly, gifts, or benefits that are intended to influence or appear to influence to or from any organization or person having business dealings with TELUS Digital other than as described below. These guidelines and the [Anti-Bribery and Corruption Policy](#) apply at all times and do not change during traditional giving events or seasons.

Accepting or offering substantial gifts from contractors, suppliers, vendors and/or community partners could be seen as presumptively fraudulent because of the potential to create undue influence. Gifts of cash or cash equivalents (such as a gift card) should not be authorized, offered or accepted, regardless of the amount. If ever unsure of an offering, please contact your leader or the Ethics Office.

Generally, team members can offer or accept a gift or entertainment as long as it:

- ▼ Does not make the recipient feel obligated or give the appearance of an obligation
- ▼ Is a reasonable complement to the business relationship
- ▼ Does not violate local law or the recipient's company's policies
- ▼ Is not solicited
- ▼ Is infrequent

Gifts and benefits that are acceptable for TELUS Digital team members to authorize, offer or accept in the normal course of business are typically less than \$250 or the close equivalent in other currencies and include:

- ▼ Attendance at local sporting or cultural events
- ▼ Business lunches or dinners
- ▼ Transportation to or from the customer's or supplier's place of business
- ▼ Hospitality suites or
- ▼ Small seasonal holiday gifts or prizes to be used in office draws and raffles.

Authorizing, offering or accepting gifts, hospitality or entertainment is not considered a conflict of interest, as long as the offerings are reasonable, within the limits of responsible and generally accepted business practices, and are intended to engender goodwill and positive working relationships among business partners. We do not want to use improper means to obtain business or gain any special advantage in a business relationship or put ourselves or TELUS Digital in a situation that creates a sense of obligation created by accepting a gift. For additional guidance on gifts and entertainment, please see the [Anti-Bribery and Corruption Policy](#).

If you are not sure whether a gift or benefit is acceptable, ask yourself:

- ▼ Would the gift be considered customary given the nature of your role with TELUS Digital?
- ▼ If the gift or benefit was reported in the media or to the TELUS Digital President and CEO, would the perception be neutral or positive?
- ▼ For offers of hospitality or entertainment, is the person extending the offer attending with you?

If the answers to these questions are “yes,” based on your good faith assessment, you may accept the gift.

If the answers to these questions are “no”, you should politely decline the gifts or entertainment. If that would be difficult or embarrassing to the provider, you may be able to accept the gift, but should ask your leader or contact the Ethics Office who will work with you to either donate the item to an approved charity, or to distribute the item amongst your peers.

It may be appropriate to attend third-party paid seminars or conferences or vendor-hosted events on behalf of TELUS Digital if there is a clear benefit to TELUS Digital for attending and the attendance is approved in advance by the team member’s leader. To avoid a real or perceived conflict of interest, team members should consider having TELUS Digital fund incremental expenses (e.g. airfare and hotel) and remember that prizes given out at such events are considered gifts and should follow the same gifts & benefits guidelines as outlined above.

Team members with supplier selection, negotiation, purchasing or contract management roles within TELUS Digital are subject to more stringent professional purchasing requirements regarding gifts and benefits and maintaining appropriate relationships with suppliers and should therefore not accept any gifts or benefits from suppliers or potential suppliers without the explicit and written permission of their leader. Where the value of any gift or benefit is \$250 or greater, the leader must also provide a copy of their authorization of that particular gift or benefit to the Ethics Office including a description of the gift or benefit, approximate value, the name of the party conferring the gift or benefit and the reason).

Team members with supplier selection, negotiation, purchasing or contract management roles include team members within the Procurement Team as well as team members in any area of TELUS Digital that have the ability to either make or influence decisions around matters including:

- ▼ the selection of suppliers, including service providers such as law firms, accounting firms, IT professionals, consultants, and suppliers of any type of hardware, software, equipment or other tangible items;

- ▼ the negotiation of contract terms with one or more supplier(s);
- ▼ the volume of goods or services to be purchased or acquired from one or more supplier(s); or
- ▼ the ongoing management of the relationship with one or more supplier(s), including decisions whether to renew or terminate any such relationship.

Case Study

Problem

A vendor has offered me tickets to a local hockey game. Can I accept them?

Action

Possibly. If the vendor is inviting you to attend the game with a representative of the vendor, this may be acceptable business entertainment providing that it is:

- ▼ undertaken for business reasons, including engendering goodwill
- ▼ infrequent
- ▼ without intent of influencing business decisions
- ▼ consistent with our Code and values.

If the vendor is not attending, then the tickets would be considered a gift and must comply with the gifts and benefits guidelines.

Problem

Part of my job involves the selection of technology suppliers. One day, a technology supplier phoned me and offered me and my family free use of his luxury vacation condominium. He says he is not using it and it would be a shame to have it sit empty. Can I accept the offer to use the supplier's condominium?

Action

No. The supplier has made a very generous offer which could appear to be offered in exchange for future special treatment from you in your position with TELUS Digital. You should decline the offer.

Problem

I would like to invite a long-time customer to go for dinner. This would give me the opportunity to stay up-to-date on his company's current needs. Is it acceptable for TELUS Digital to pay for this?

Action

Possibly, provided you are doing this purely for business reasons, without intent of influencing any business decisions and staying within our Code and values.

Dealing with Suppliers

We value our relationship with suppliers (including contractors and consultants) and those acting on behalf of TELUS Digital because they contribute to our overall success. We strive to ensure our business dealings with them are ethical and that they understand our expectations of them as outlined in our Supplier Code of Conduct.

Selection and Use of Third Parties/Procurement

We expect our suppliers to meet or exceed the requirements set forth in the Supplier Code of Conduct and to cause their affiliates, suppliers, employees and contractors to perform obligations for TELUS Digital consistent with the standards set out in the Supplier Code of Conduct.

- ▼ We strive to award business to suppliers who are in compliance with applicable laws in their business operations, including in their relationships with their employees, their communities and TELUS Digital.
- ▼ We strive to select our suppliers based upon objective and fair criteria including, but not necessarily limited to, business need, price, service, quality, reputation for ethical conduct and health, safety and environmental business considerations.

Adherence to applicable TELUS Digital policies

- ▼ We expect the suppliers with whom we do business to demonstrate values and standards similar to those in the applicable TELUS Digital policies.
- ▼ We strive to ensure that our suppliers are made aware of TELUS Digital policies that are applicable to the work for which they are being engaged.

Every TELUS Digital team member who commits to buy services or products from a Supplier on behalf of TELUS Digital is responsible for: the prudent exercise of and adherence to internal controls; ensuring all transactions are justified and supported by business objectives; ensuring the best value for money spent; and complying with TELUS Digital policies. Consequently, at the beginning or renewal of every supply arrangement, such team members are required to protect the best interests of TELUS Digital by performing a risk assessment on our potential/continuing suppliers and performing additional mandatory due diligence commensurate with all identified risks.