

External Whistleblower Policy of TM Forum

Purpose and Scope

At TM Forum, we expect everyone to do the right thing, and we call it the TM Forum Way. We want our Members and anyone else working with us, we call them “Partners,” to feel comfortable reporting anything that seems improper without fearing any backlash. So, we adopted this External Whistleblower Policy to ensure our Members and Partners can speak up about any suspected illegal or unethical activity. TM Forum staff and Board members with concerns should refer to our Internal Whistleblower Policy.

Principles

You can speak up without any fear of retaliation if you see something that appears unlawful, violates policies, or just doesn’t seem right, such as:

- a violation of or noncompliance with any applicable law;
- a crime or breach of rules or laws including, but not limited to, antitrust, fraud, bribery, and corruption;
- a breach of any policy adopted by the TM Forum, including the TM Forum’s Antitrust Policy;
- a breach of or failure to comply with the TM Forum’s governing documents;
- questionable accounting or auditing practices;
- the endangering of an individual’s health and safety;
- damage to the environment;
- misuse of information to further private interests or gain an unfair advantage;
- improper or unethical conduct, including discrimination;
- deliberate concealment of information relating to any of the above.

When you’re reporting something, make sure you’re sincere and acting in good faith. We won’t retaliate against anyone honestly making a good-faith report, but we also won’t tolerate malicious or intentionally false reports.

Reporting Procedure and Investigation

Need to report a concern? You can talk to a Senior Leadership Team member or TM Forum’s Legal Counsel. You can also write to the Chair of the Appointments and Governance Committee. When reporting, give as many details as you can about who’s involved and what’s going on.

Senior Leadership Team members and our Legal Counsel will pass along any reports to the Chief Financial Officer or the Chair of the Appointments and Governance Committee. The CFO and Chair are responsible for looking into all reports and taking further action as needed. The Appointments & Governance Committee will oversee any investigation, if necessary.

You may want to submit your report confidentially. We'll do our best to keep your identity confidential as long as we can do so legally.

The Finance & Commerce Committee will handle any reports about accounting, internal controls, or auditing, and the CFO will inform the Committee if your report concerns anything financial.

Other Reporting Procedures

This Policy doesn't replace any other reporting procedures. If the issue is about your own organization or involves criminal law, use the appropriate channels, like your organization's whistleblowing procedure, or contact the proper law enforcement agency. For suspected antitrust law breaches, you should contact the appropriate governmental competition authority.

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