



eServGlobal Code of Ethics

Paris Headquarters
eServGlobal SAS
244, avenue Pierre Brossolette
92245 MALAKOFF Cedex
France

T: +33 1 46 12 58 85
F: +33 1 47 35 07 88

www.eservglobal.com



eServGlobal Code of Ethics

eServGlobal is a worldwide supplier of independent and flexible telecommunications Value Added Services for Charging, Payment and Retention solutions for over 60 customers in more than 45 countries. We operate with 14 offices around the world and staff from 30 different countries.

eServGlobal's ethical commitment is based on the following values:

- » loyalty & transparency
- » positive relationships
- » respect for the law
- » respect for health & security
- » respect for the environment
- » confidentiality
- » prevention of conflicts of interest

In every eServGlobal entity, management is responsible for instilling these ethical values and ensuring that the corresponding principles are applied.

Every employee has the responsibility to ask questions, seek guidance and report suspected violations of this Code of Ethics.

The Code of Ethics is applicable to all eServGlobal operations and to any party that contributes to eServGlobal products, services and other business activities.

eServGlobal November 2010

eServGlobal Code of Ethics

1 Loyalty and Transparency

eServGlobal provides its shareholders with transparent and comprehensive information and accurately records its activities in its accounts. This information is available on the eServGlobal website (www.eservglobal.com)

eServGlobal endeavours to show in all situations complete fairness towards our customers, who honour us with their confidence and to carry out required actions to ensure legitimate interests.

2 Positive Relationships

eServGlobal respects each party's interests, with transparent and fairly negotiated contract terms and, in return, expects them to adhere to principles equivalent to those in its Code of Ethics.

Each employee of eServGlobal follows the principles of honesty and loyalty in their interactions with customers and suppliers, and is prohibited from soliciting (directly or indirectly) any gifts and from accepting gifts of a significant economic value.

Each employee is expected to be loyal and attentive to the quality of his or her relationships with colleagues, and to refrain from any act of discrimination.

Every employee is expected to work as part of a team.

3 Respect for Laws

As a global principle, eServGlobal complies with all applicable laws and regulations that apply in the country where it does business, as well as international laws between countries. This includes without limitation:

- » the universal declaration of human rights
- » the International Labour Organization's Core Conventions (ILO) (esp. forbidding practices such as discrimination, child labour and bonded labour)
- » environmental regulations

4 Respect for Health and Security

eServGlobal endeavours to implement an active policy of prevention in relation to health and safety at work and to ensure that it is continuously applied.

Specific strategies are implemented to mitigate risks related to health and safety with regards to the countries where the projects take place.

Employees are responsible for ensuring that their involvement in eServGlobal's activities is carried out in full compliance with the company's health and safety rules and regulations.

Suppliers and partners operating on eServGlobal's premises are asked to exercise the same vigilance.

6 Confidentiality

Each employee of eServGlobal endeavours not to disclose to third parties or to other employees within the company who are not entitled to receive it, confidential business information to which s/he has access.

Each employee commits to not using directly or indirectly, for their own purposes, privileged information held by them in connection with, or for the purpose of, their duties.

eServGlobal has established nondisclosure agreements with its partners and subcontractors. Additionally, an individual deed of confidence is signed by each external person involved in an eServGlobal project.

5 Respect for the Environment

eServGlobal respects the natural and cultural environments of the countries in which it operates. This environmentally-aware approach includes in particular:

- » Eco-design of solutions delivered to our customers
- » Transportation policy
- » Energy efficiency
- » Reduction of hazardous substances
- » Waste recycling
- » Limiting consumption of paper

7 Conflicts of Interest

Employees may encounter situations where their own personal interest or that of persons or companies with which they have ties or links, may conflict with eServGlobal's interests.

In such cases, they shall bear in mind eServGlobal's interests and the loyalty they owe to the company.