

# CODE OF CONDUCT

Version dated August 2006

## INTRODUCTION

The Board of Directors of [infeurope S.A.](#) has adopted the following Code of Conduct (this "Code") which applies worldwide to all directors, executive officers and employees of our Company and its subsidiaries.

Associates, as well as temporary employees and consultants, are expected to comply with this Code.

## AIMS

We aim to ensure the continuing integrity of our core business and services. Improper activities, or even the appearance of impropriety, could result in serious consequences for [infeurope S.A.](#) and the personnel involved in such activities.

Therefore, this Code sets forth the core values, fundamental principles and key policies that govern the conduct of all of the Company's directors, officers and employees.

## CORE VALUES

Our customers' interests come first. Our assets are our people, know-how, information and reputation.

### Our Customers

Serving in a professional manner and respecting our customers has been the source of our own success. Providing them with high quality product and services delivery is our leading value.

### Our People

We believe in equal chances and opportunities given to employees. We are committed to a highly skilled, diverse, and compassionate workforce. And we encourage a culture of respect, equal opportunity, innovation, and accountability.

## Integrity and Ethic

We commit to a strong moral and ethical conduct, striving to continuously build trust with our employees, customers, business partners, shareholders and consultants.

## Quality and Safety

We aim to maintain and improve the quality and safety of our people, products and services by making the best use of technology and methods and by respecting the highest safety requirements.

## Continuous Training

The technical and social competencies, as well as the know-how of our staff, count among the Company's core assets. For this reason, we foster continuous personal training to ensure the skills and knowledge development of our personnel in technology, project and service management.

## CODE PROVISIONS

### Compliance with Laws, Rules and Regulations

It is the Company's policy to comply with all applicable laws, rules and regulations in Luxembourg or any country in which [infeurope S.A.](#) operates. It is also the personal responsibility of each employee and director to adhere to the standards and restrictions imposed by those laws, rules and regulations.

### Conduct and Behavior Standards

All employees are expected to contribute to the success of [infeurope S.A.](#) by performing their jobs as required and conducting themselves in a professional manner compatible with the

Company's business philosophy, values and standards of business conduct.

Honesty and integrity are fundamental to ethical business practices. It is also essential to avoid making misrepresentations or dishonest statements to anyone inside or outside the Company.

### **Protecting Company Information**

Technology, ideas, customer lists, undisclosed financial data and reporting, confidential technical data, marketing, pricing or service strategies, business negotiations, costs and volumes, supplier and subcontractor information are, among others, our most valuable business assets.

Protecting their confidential and proprietary nature is the ethical duty of every infeurope employee. He or she must consider whether information they handle or share might give infeurope S.A. a competitive advantage or could damage the Company if its disclosure were out of its control. If so, it would be considered as confidential.

All our employees share a responsibility to our customers, shareholders, and each other to protect the Company's information assets from unauthorized access, use, modification, destruction, theft, or disclosure.

### **Conflicts of Interest**

A personal conflict of interest occurs when an individual's private interest improperly interferes with the interests of the Company.

Personal conflicts of interest are prohibited as a matter of corporate policy, unless they have been approved by the Company.

In particular, an employee or director must never use or attempt to use his or her position in the Company to obtain any improper personal benefit for himself or herself, for his or her family members, or for any other person, including loans or guarantees of obligations, from any person or entity.

Service to the Company should never be subordinated to personal gain and advantage. Conflicts of interest should, to the extent possible, be avoided.

Any employee or director who is aware of a material transaction or relationship that could reasonably be expected to give rise to a conflict of interest should discuss the matter promptly with an appropriate ethics contact.

### **Protecting Privacy and Personal Data**

infeurope S.A. respects the privacy of its customers, business partners, directors, employees, shareholders, consultants, applicants and other individuals. The collection, use, storage, disclosure, destruction and other disposal of personal data, shall comply with all applicable laws and regulations as well as internal and other rules.

infeurope S.A. will handle all personal data in an appropriate manner and will not use or disclose such data to any person outside the Company or to any employee who has no need to know them, both during office and after retirement.

### **Work Environment**

We respect and highly value our diverse employee population. Accordingly, the Company has an uncompromising ethical engagement toward promoting a workplace that recognizes personal differences and is free of discrimination and harassment. This principle applies in our hiring and interviewing process as well as in all aspects of our work environment. infeurope S.A. is also committed to providing a respectful, creative, and positive atmosphere to their employees.