

Code of Conduct Equens SE

EQUENS

Sound solutions, solid results

Code of Conduct

Who we are and how we work

Equens commits to encouraging a safe, supportive and productive work environment. The content of this code connects to our Core Values and Culture Keys, the company values we live by at Equens.

The Core Values and Culture Keys of Equens are important in helping us to remain successful, today and in the future. They reflect what we stand for and what our customers can expect from us. They will however have no meaning when we don't integrate them in our daily activities. This Code of Conduct helps us in doing so. It provides us with concrete guidelines regarding how we want to cooperate and what we can expect from our colleagues.

In essence, the Code of Conduct captures not only the Core Values or Culture Keys, but also our key and relevant company directives. It thereby assists all of us in performing our jobs in accordance with the company's standards.

As an employee of Equens you have a personal obligation to be aware of the content of this Code of Conduct and to comply with it. In doing so, you contribute to the objectives and the success of Equens.

In reading this Code of Conduct you will find that the content is not new to you and in many cases you already act accordingly. Still, I want to point out that complying to the content is binding and part of your way of working at Equens.

If you are facing a situation that gives you any doubt as to how to act regarding this Code of Conduct, please contact your manager. Your manager will also be able to help you answer any questions about interpreting or applying this code.

Furthermore, you should bring any activity which is in violation of company policy or law to our attention by using the appropriate procedures as described in the Code. We, as Board of Directors, are committed to providing the utmost protection to employees who report a breach or suspected breach of the Code.

I encourage all of you to prevent these kind of situations and trust we will all commit to and comply with this Code of Conduct.

This Code of Conduct will show our current and future clients who we are and how we work. I am therefore counting on each employee to fully embrace the content. In doing so we can ensure that we continue to build a company we can all be proud of.



Michael Steinbach, CEO
March, 2014

Content

1 Introduction	2
1.1 Objectives and scope	2
1.1.1 Objectives	2
1.1.2 Scope	3
1.1.3 Code-related questions or concerns	3
1.1.4 Individual Integrity versus Business Integrity	3
2 Business integrity	4
2.1 Free enterprise and fair competition	4
2.2 Human rights	4
2.3 Corporate Social Responsibility	4
2.4 Diversity and Equal opportunity employment	5
2.5 Health and safety	5
2.5.1 Workplace safety and environment	5
2.5.2 Discrimination and harassment	5
2.5.3 Workplace violence	5
2.6 Respect for local culture, customs and views	5
2.7 Communication & Information	5
2.8 Accounting	5
2.9 Data protection	5
3 Individual integrity	6
3.1 Compliance with the Law	6
3.2 Conflicts of interest	6
3.2.1 Secondary work	6
3.2.2 Personal gain, gifts, bribery, corruption	6
3.2.3 Gifts from third parties	6
3.2.4 Friends and relatives, co-worker relationships	7
3.3 Confidentiality	7
3.3.1 Internal and external communications	7
3.3.2 Exchange of confidential information with customers, suppliers and partners	7
3.3.3 Inside information	7
3.4 IT Code of Conduct	7
3.4.1 Use of IT resources	7
3.5 Protect Equens' assets	9
3.5.1 Intellectual property	9
3.5.2 Company property and funds	9
3.6 Substance abuse	9
3.7 Gambling	9
3.8 Misconduct off the job	9
Annex 1 Mission and Vision	10
Annex 2 Culture keys	11
Annex 3 Germany	12
Annex 4 Italy	14
Annex 5 The Netherlands	15

1 Introduction



This Code of Conduct defines standards in all business, legal and ethical matters carried out in daily business, and is meant as a tool and a guide for dealing with clients, suppliers and partners; interaction with competitors; as well as in financial areas.

1.1 Objectives and scope

This Code of Conduct clarifies the standards that we expect the company to follow and the behaviours the employees have to adopt.

1.1.1 Objectives

The Code of Conduct goes beyond pure legal requirements. Equens can only maintain its reputation as a serious, professional business partner long term by behaving fairly, ethically, and correctly in all business activities. We need to earn our central position in society by doing business in a responsible way. We want to earn our “licence to operate” from our clients and stakeholders, our employees, and our environment. Our business activities are based on our mission and vision (see annex 1). At the base of our mission are our core values. Our core values are:

- Client orientation
- Efficiency and outstanding quality

Our core values clearly define our basic strategic goals. Additionally our ‘culture keys’ describe how we expect our employees to act and interact to support our core values. The Culture Keys are:

- Teamwork
- Passion
- Clarity
- Focus

These four Culture Keys guide us in realising our ambitions. These are more than a few words, they ask for matching behaviour. For each key we have set out what behaviour is meant and what attitudes and knowledge relate to this.

This code of Conduct relates directly to these core values and culture keys as well as the legal and ethical framework within the daily business of Equens. We have defined some examples, according to the culture keys, of behaviour that match the objectives of this Code of Conduct. These examples are available in annex 2.

We set the bar this high for practical as well as ambitious reasons: our commitment to the highest standards helps us hire excellent people (see our mission), who then offer and perform great services, which in turn attract

loyal clients. Trust and mutual respect among employees and clients are the foundation of our success, and this is something that we need to earn every day. Since Equens operates in a business where compliance with legal as well as client requirements is of critical importance, the code of conduct in particular also includes critical legal and compliance requirements which need to be adhered to.

1.1.2 Scope

This Code of Conduct applies to:

- All employees and management of Equens SE, hereinafter referred to as employees of Equens, including its subsidiaries InterEGI B.V., PaySquare SE, DZ Service GmbH and BD-POS GmbH, and branches;
- Subcontractors, consultants and others that are temporarily assigned to Equens;
- Suppliers.

Equens expects all employees to endeavour to achieve the aims of Equens and the goals agreed for their work while complying with the Code of Conduct. In principle, failure to comply with this code will result in an investigation and could lead to disciplinary actions, up to and including termination of employment, as well as civil or criminal penalties.

These consequences may apply not only to employees who commit misconduct, but also to those who condone misconduct or fail to take measures to prevent, detect and address misconduct.

In addition to leading by example, all employees have the responsibility to take the necessary steps to comply with this Code of Conduct and to pass along problem situations to the Corporate Compliance Officer of Equens. Moreover, while the Code is specifically written for Equens employees, we require Equens' contractors, consultants and others who may be temporarily assigned to perform work or services for Equens to follow the Code in connection with their work for Equens. Failure of a contractor or consultant or other covered service to follow the Code can result in termination of their relationship with Equens.

1.1.3 Code-related questions or concerns

This code of conduct highlights main topics and there is no exhaustive list of situations. In case of questions or concerns, we expect employees to take action by

contacting management, a HR Advisor or the Corporate Compliance Officer of Equens.

The employee's manager is responsible for ensuring that conflicts of interests are resolved as quickly as possible.

The Corporate Compliance Officer provides guidance and advice.

Equens prohibits retaliation against any employee who reports or participates in an investigation of a possible violation of our Code of Conduct. If an Equens employee believes he or she is being retaliated against, Equens expects the employee to contact the Corporate Compliance Officer and/or HR Advisor.

This code will be annually reviewed by HRM.

1.1.4 Individual Integrity versus Business Integrity

At Equens, we have a commitment to integrity, high ethical standards and compliance with applicable laws, rules and regulations. Our future success depends on maintaining the trust and confidence of the individuals and groups of people who rely on us and with whom we do business. Equens, as a company, has a responsibility towards all its stakeholders.

In the next two chapters the business principles that guide Equens ('We') in its daily activity are clarified in more detail (chapter 2), as much as the expectations, requirements and obligations regarding the individual integrity of our employees (chapter 3).

2 Business integrity



Integrity is made up of several words, meanings and synonyms. It mostly consists of what can be described as ethical and moral values or civilised values. We all know that it's about 'doing the right thing', but what does this mean in practice?

We strive for open and transparent business practices which are based on ethical values and respect for employees, communities and the environment. By doing so we want to earn our "licence to operate" delivering sustainable value to society at large, and reducing any negative impact that might derive from our activities (business but not at any cost).

In this chapter we set out the principles that guide Equens as a company ('We') in achieving our ambitions. These principles are applicable to all activities of our company, anywhere in the world, and the individual behaviour of our employees.

Equens insists on integrity in all aspects of our business and expects the same in our relationships with all those with whom we do business.

2.1 Free enterprise and fair competition

We support the principles of free enterprise and fair competition. The company aims to meet clients' needs faster, better and more distinctively than our competitors. To this end, Equens will compete vigorously but fairly, and within the framework of applicable competition laws. Equens insists on integrity and fairness in all aspects of its business operations.

2.2 Human rights

We will conduct our activities in a socially responsible manner. In this respect, we observe the laws of the countries in which we operate; we respect the International Declaration of Human Rights in line with the legitimate role of business, and give proper regard to health and safety of our employees and our community. We will be resolute in upholding human rights in everything we do and will not tolerate discrimination in others. Ignorance and inaction do not constitute excuses for discrimination. We will make every endeavour to be fully aware of human rights issues and foster respect and equality for all.

We realise to be a link in a chain. For this reason we ask our suppliers to act according to the International Declaration of Human rights, labour rights, health and safety of their own employees and communities.

2.3 Corporate Social Responsibility

The key elements to improve our ecological footprint are:

- our support for a precautionary approach to our physical environment, consistent with our commitment to contribute to sustainable development;
- an efficient use of energy and reduction of waste.

Thus, we undertake initiatives to support greater environmental responsibility, from the company itself, from our employees, and from our suppliers.

2.4 Diversity and Equal opportunity employment

We are committed to an attractive working environment for our employees. In this respect, it is our responsibility to recruit, hire and promote employees solely on the basis of suitability for the job, to stimulate their individual and professional development, and to provide safe and healthy working conditions.

Our employees must be recruited, selected and promoted on the basis of objective and non-discriminatory criteria. No harassment or discrimination of any kind will be tolerated (for example, discrimination based on race, colour, sex or religion).

In the case of disability or chronic illness employees should be able to work for as long as they are medically fit in available, appropriate employment conditions, without facing prejudice or discrimination. In all circumstances, employees should be allowed to retain their employment insofar as they are able to fulfil the requirements of available and appropriate work.

2.5 Health and safety

2.5.1 Workplace safety and environment

We provide safe and healthy working conditions in order to prevent harm to, and promote the health of, all employees and other stakeholders. In order to do so, health and safety programs, rules and regulations apply at all sites. It is the responsibility of each employee to comply with health and safety regulations.

Equens will do what is in its power to prevent any injuries at work, both for our own employees and for our contractors

2.5.2 Discrimination and harassment

The diversity of our employees is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any discrimination or harassment based on race, colour, religion, sex, national origin or any other protected class.

2.5.3 Workplace violence

We are committed to a violence-free work environment, and we will not tolerate any level of violence, nor physical or psychological, or the threat of violence in the workplace.

2.6 Respect for local culture, customs and views

Customs vary from country to country. Therefore, in addition to understanding the laws and customs of our home territory, we also will become familiar with and respect the laws, customs and culture of other territories in which we do business.

2.7 Communication & Information

Openness, integrity and reliability foster open two-way communications between the employee and his or her manager on all aspects of the working environment. In principle, all employees are encouraged to discuss such matters with their immediate supervisor or, when communication with the immediate supervisor is constrained, with the direct supervisor's manager. Where the communication through the employee's hierarchical line is not a viable option, any employee may use the company complaints procedure to highlight the issue to senior management.

2.8 Accounting

All business transactions shall be accurately and completely recorded in accordance with the company's accounting principles and local laws and may be subject to audit.

2.9 Data protection

We collect and store information. Equens recognises the importance of protecting data. We shall only process data for specified purposes. Access to and storage of data will take place in line with local law, applicable regulations and internal policies, and it will be kept secure according to those standards.

3 Individual integrity



In this chapter we describe in more details what we expect of our employees on an individual level.

3.1 Compliance with the Law

Obedying the law, both in letter and in spirit, is the foundation on which our company's ethical standards are built. All employees and management must respect and obey the laws, rules and regulations of the cities, states and countries in which we operate. Although employees and management are not expected to know the details of each of these laws, rules and regulations, it is important to know enough to determine when to seek advice from supervisors, managers or other appropriate personnel.

3.2 Conflicts of interest

Our employees must remain loyal to Equens in their personal conduct. Specifically, this means employees:

- Must avoid situations in which their personal or financial interests conflict with those of Equens;
- Must not pursue any interests of their own within the context of doing their jobs that conflict with the interest of Equens;
- Must not directly or indirectly exploit any business opportunity available to Equens for their own benefit, or for the benefit of persons or companies outside of Equens with which they are connected.

Any appearance of a possible conflict of interest is to be avoided and upon discovery is subject to review. There is no exhaustive list of situations that could potentially raise conflicts of interests. To provide better understanding, however, a few typical examples follow below.

3.2.1 Secondary work

It is a conflict of interest for an Equens employee to work for a competitor, client or supplier. Employees are not allowed to have any direct or indirect business connection with our clients, suppliers or competitors, except as required on our behalf.

3.2.2 Personal gain, gifts, bribery, corruption

Our employees must not be influenced by bribery or corruption to do, or to refrain from doing, anything in their work. Employees of Equens must not draw any personal gain or other benefit (except their salary and any additional compensation approved by senior management) from any business they carry out for Equens and must not make any offer to any third party with the intention of inappropriately influencing a business decision by that party.

3.2.3 Gifts from third parties

Our employees cannot provide or accept extravagant, uncustomary or lavish gifts or entertainment to or from

suppliers, clients and other business partners, including gifts of money, perceived value or other factors which might influence or be perceived to influence a business decision of Equens or suppliers, clients and other business partners.

Our employees are bound by the Corporate Gifts, Entertainment and Anti-Bribery Policy of Equens.

3.2.4 Friends and relatives, co-worker relationships

Conflicts of interest may also arise when an employee, or a member of his or her immediate family, receives improper personal benefits as a result of his or her position in the company.

No objections exist to relatives, life partners, and other persons with close personal connection to Equens employees being employed at Equens so long as there is no danger of a conflict of interest.

To avoid conflict of interest of any kind, direct reporting lines are generally not favoured between relatives, life partners, or other persons with whom an employee has close personal connections. An employee may be required to switch jobs, when necessary. Exceptions are permitted with prior approval of senior management.

3.3 Confidentiality

3.3.1 Internal and external communications

The management of Equens always seeks to provide open and frank communications and discussions of the company's business activities and strategies with the employees of Equens. The dissemination of business-related information, both internally and externally, that concerns the company, its business activities, its strategy, or any other company affairs, is the responsibility of employees who are explicitly authorised to do so.

Our employees must not contact representatives from the media on their own initiative unless authorised to do so.

Equens employees who are not authorised to disseminate information must:

- Forward queries from representatives from the media to Marketing & Communications, regardless of how the employee of Equens received the request;
- Not express an opinion in the name of Equens.

3.3.2 Exchange of confidential information with customers, suppliers and partners

Our employees must not pass any information identified or identifiable as confidential to clients, suppliers or partners, nor as a rule, will they accept confidential information from clients, suppliers, or partners; unless a written nondisclosure agreement is signed.

Equens employees must not pass any clients, suppliers, or partner's confidential information to another client, vendor, partner or other person outside Equens. The same applies to current and potential clients, suppliers or partners.

3.3.3 Inside information

Our employees may become aware of information about Equens or other companies that has not been made public. The use of such non-public or 'inside' information, other than in normal performance of one's work, profession or position is considered to be unethical.

3.4 IT Code of Conduct

3.4.1 Use of IT resources

As a general rule, all IT-related resources and facilities are provided only for internal use and/or business related matters, not for personal use. IT facilities which have been provided to employees should never be used for personal gain or profit, should not be misused during work time, and remain the property of Equens.

IT-related resources and facilities should not be used in any way that is unethical or illegal, or that could embarrass, defame, misrepresent, or convey an unjust or unfavourable impression of Equens or its business affairs, employees, suppliers, clients, competitors, or stakeholders. Unauthorised access to information and information systems is prohibited; access must be authorised by the owners of the information and in line with the user's job description.

Information Security

Information systems are secured by personal passwords and/or additional authentication means like hardware tokens; users must use these in a responsible way, keeping them personal and securing them against misuse.

Use of software

Any installation, change, removal, or personal use of software provided by Equens or available on Equens information systems must be authorised and managed by the information management organisation or a delegated party.

Use of hardware

In order to prevent theft, loss, or unauthorised use of information and systems, a user has to take measures to ensure the physical security of hardware provided (such as laptops, phones, tokens or USB sticks).

Back-up and storage

To protect the availability of company data, users have to secure relevant business information in a timely manner, by making back-ups or storing data on network drives.

E-mail and internet

The e-mail and internet facilities supplied by Equens are to be used for business purposes only. The Information Security Manual Equens describes to what extent the e-mail and internet facilities can be used for personal purposes. It is, in principle, not allowed:

- to forward internal e-mail to external receivers;
- to send blasphemous, threatening, (sexually) intimidating, (child)pornographic, racist or otherwise discriminating e-mail messages;
- to intentionally visit internet sites that contain blasphemous, threatening, (sexually) intimidating, (child)pornographic, racist or otherwise discriminating material, unless this is necessary for work purposes connected to client contracts as f.i. execution of credit card contracts;
- Storage and processing of illegally acquired information or information of which possession is illegal is not allowed, not even for personal purposes.

Furthermore, the personal use of the facilities for e-mail and internet may not constitute a substantial burden for the IT-infrastructure of Equens.

Social media

Emerging platforms for online collaboration are fundamentally changing the way we work, offering new ways to engage with clients, colleagues, and the world at large. It's a new model for interaction and we believe social computing can help to build stronger, more successful business relationships. And it's a way for our employees to take part in global conversations related to the work we are doing at Equens and the things we care about.

If employees participate in social media we expect them to follow these guiding principles:

- Stick to your area of expertise and provide unique, individual perspectives on what's going on at Equens and in the world.
- Post meaningful, respectful comments – in other words, no spam and no remarks that are off-topic or offensive.
- Respect proprietary information and content, and confidentiality. In case of doubt whether the information is confidential, do not disseminate internal information.
- When disagreeing with others' opinions, keep it appropriate and polite.

Clear desk policy

We operate a Clear Desk Policy. The main reasons we have introduced the policy are:

- It shows the right image when our clients visit the company;
- It reduces the threat of security as passwords and confidential information get locked away;
- Scientific studies have shown that there is a reduction in stress with employees having a tidy desk;
- Studies have also shown a reduction in workplace accidents and spills;
- It is generally accepted that a tidy desk is a sign of efficiency and effectiveness.

Equens employees are expected to tidy away all documents when leaving their desk.



Compliance to information security principles

Information security-related incidents, or violation of information security principles, must be reported to the local IT helpdesk or information security contact. Possible evidence should not be tampered with, and to comply with the information security rules and procedures applicable to his or her specific department and office, as communicated by the local information security contact.

Review of IT activities

In case of a reasonable suspicion Equens reserves the right to review the activities performed by the user using company-provided IT facilities. In such cases, line management will be asked for authorisation, local employee representatives will be informed where applicable, and local law will be observed at all times.

3.5 Protect Equens' assets

3.5.1 Intellectual property

Intellectual property includes information protected by Equens' trademarks or copyrights, the use of which is restricted by applicable intellectual property laws. To safeguard Equens' intellectual property from illegal copying or other misuse, employees must ensure it is affixed with or identified by trademark, service mark or copyright symbols.

3.5.2 Company property and funds

Company property and funds, which include, anything that has or represents financial value, must be handled responsibly, honestly and in accordance with applicable company policies. Personal or unauthorised use of company funds is strictly prohibited. Corporate credit cards must be used solely for authorised business purposes and may not be used for personal charges.

3.6 Substance abuse

Substance abuse can have devastating consequences in general, at any work place. Therefore the use of any illegal drugs on Equens premises is strictly forbidden. Illegal drugs include all drugs except prescribed and over-the-counter drugs that have been legally obtained and used only for the purpose for which they were intended.

Equens strongly encourages a business environment free of alcohol. Therefore, in principle the use of alcoholic beverages is prohibited. Management can allow the moderate consumption of alcohol for internal or external events in accordance with local customs and practices.

3.7 Gambling

Gambling or participating in any games of chance (including raffles, sports pools or lotteries) on company premises, on company systems or while conducting company business is prohibited.

3.8 Misconduct off the job

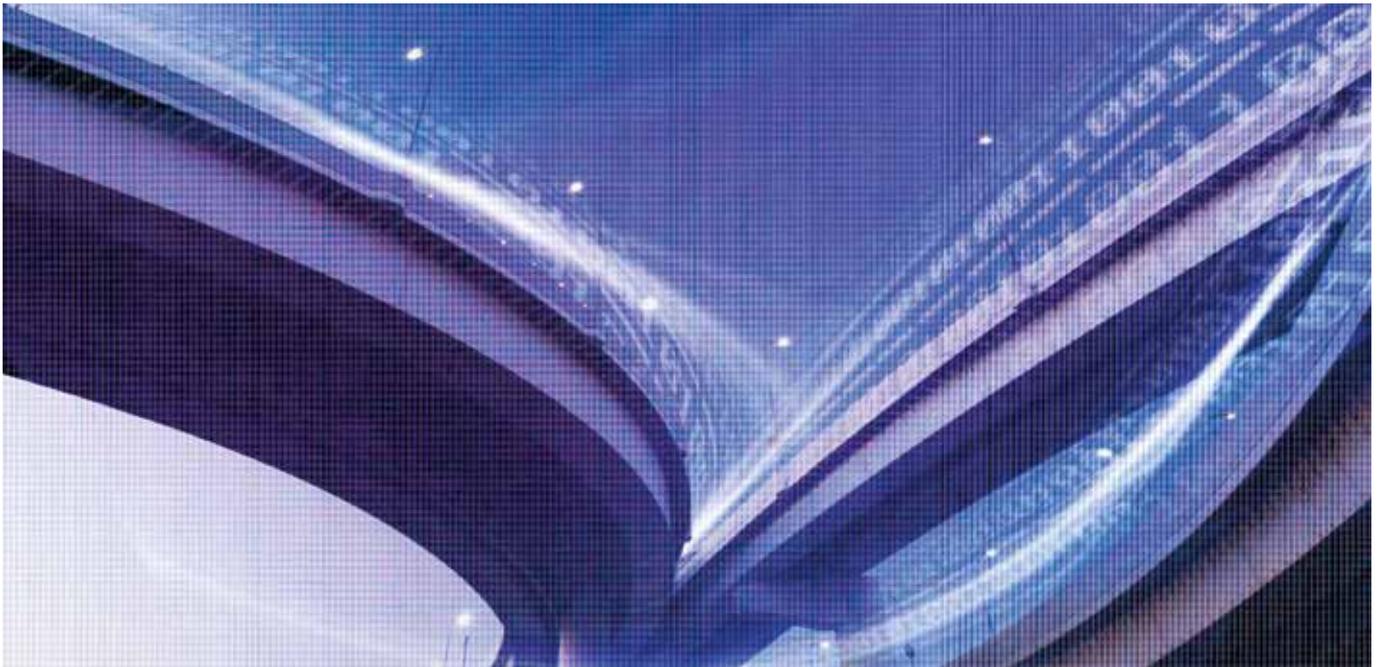
Employees must avoid conduct off the job that could impair work performance or affect the company's reputation or business interests.

In order for the company to determine whether off the job conduct could impair work performance or affect the company's reputation or business interests, you must promptly report to your manager:

- any arrest pending final resolution or conviction for any felony;
- any arrest pending final resolution or conviction for a crime involving dishonesty, assault or battery;
- any other arrest pending final resolution or conviction which may affect your ability to perform your job or otherwise affect the company's business interests.

Annex 1

Mission and Vision



Mission statement

Equens is an independent pan-European, full-service processor offering a distinctive and modular range of payment and card services as well as innovative solutions to contribute to the value proposition of our clients. We display distinct client orientation by offering a portfolio that has been developed with one goal: serving our clients needs - without affecting the typical market standards regarding lowest possible processing costs and highest standards of quality, reliability and security. Excellent people and integrated, state-of-the-art processing platforms represent the key prerequisites in achieving this ambition.

Equens' vision

Equens strives to be the top pan-European, full-service processor offering a full range of payment and card processing services as well as complementary services. By offering a superior price/performance ratio in combination with high level quality and service as well as a professional time to market, we want to become the preferred partner for payments, cards and related processing services.

Annex 2

Culture Keys

Our Culture Keys in relation to the Code of Conduct

Our core values are translated into Culture Keys: Teamwork, Passion, Clarity and Focus. These four Culture Keys guide us in realising our ambitions. These are more than a few words, they ask for matching behaviour. For each key we have set out what behaviour it is and what

attitudes and behaviour is related to this.

This code of Conduct relates directly the Core values and our culture keys.

Below, for each Culture Key we give examples of attitude and behaviour that relate to our Code of Conduct:



- You collaborate with both direct colleagues and colleagues from other centers and departments and look beyond the boundaries of your own department
- You co-operate and share best practice with other parts of the organisation in relation to client service
- You think 'outside the square' and beyond Equens for new ideas to improve and plan and prioritise for these to be met
- You seek out others involved in a situation to learn their perspectives in order to facilitate the accomplishment of work goals, while respecting personal differences



- You communicate open, transparent, clear and honest and act accordingly
- You ask for, and give, feedback in a respectful way
- You present information logically and concisely in ways that promote understanding
- You talk to clients (internal and external) to find out what their needs and wishes are and you are able to point out added value



- You know where Equens is heading for, what the client wants, what the market asks, you know your own contribution and translate all this into your work and behavior
- You give high priority to the needs and wishes of the client
- You set SMART targets for yourself and monitor them
- You commit to plans, milestones and performance indicators
- You balance urgency with a strong sense of quality and efficiency
- You question processes and challenge rules that are inefficient and stand in the way



- You are involved, you enjoy your work and are proud to work for Equens
- You go the extra mile to satisfy clients' needs and expectations
- You do things wholeheartedly, with passion and enthusiasm and set high standards
- You are keen to adopt quality improvements and procedures
- You are tactful, compassionate and sensitive, and treat others with respect

Annex 3

Germany



In this Annex are highlighted specific peculiarities related to the German regulations in relation to the Code of Conduct.

1.1 Objectives and scope

1.1.2 Scope

In Germany the clause “These consequences may apply not only to employees who commit misconduct, but also to those who condone misconduct or fail to take measures to prevent, detect and address misconduct” is fully replaced by:

Furthermore Equens wishes that all employees and management who recognise/ condone misconduct will report via the complaint procedure.

All further regulations of this paragraph are valid for Germany unaltered.

1.1.3 Code-related questions or concerns

In Germany the rights of the works council are strong in the area of individual employee rights. In that context for

Germany the following clauses are added to point 1.1.3:
In Germany all employees also can report their concerns anonymously at the local works councils in Frankfurt and Stuttgart.

The works council will be informed/ consulted in time when changes of the Code of Conduct will be conducted.

2.5 Health and Safety

2.5.2 Discrimination and Harassment

The paragraph about discrimination and harassment is supplemented for Germany with the ways of discrimination which are defined in the “Allgemeines Gleichbehandlungsgesetz”. The paragraph reads as follows:

The diversity of the company’s employees is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any discrimination or harassment based on race, colour, religion, sex, national origin, ideology, disability, sexual identity or any other protected class.

2.7 Communication & Information

The second clause of the paragraph is for Germany replaced by the following regulation:

Where the communication via the employee's hierarchical line is not a viable option, any employee can report the matter to the Senior Management via the well-known communication channels (Works Council, Representative for disabled persons, HR Department).

All further regulations of this paragraph are valid for Germany unaltered.

3.2 Conflicts of interest

3.2.4 Friends and relatives, co-worker relationships

The third clause of paragraph 3.2.4 will be replaced for Germany by the following clause:

To avoid conflicts of interest of any kind, direct reporting lines are generally not favored between relatives and life partners and should be avoided.

All other regulations of paragraph 3.2.4 are valid for Germany unaltered.

3.8 Misconduct off the job

For Germany the whole paragraph 3.8 of the Code of Conduct is replaced by the following regulations:

Employees must avoid conduct off the job that could impair work performance or affect the company's reputation or business interests. In order to determine whether off the job conduct could impair work performance or affect the company's reputation or business interests, the employee shall promptly report to the management:

- Arrest or conviction for a crime involving dishonesty, assault or battery
- Other arrest or conviction which may affect your ability to perform your job or otherwise affect the company's business interests

Annex 4

Italy



For all employees and others mentioned hereafter also the Code of Ethics is applicable. This means that adherence to both the Code of Conduct and Code of Ethics is mandatory.

1.1 Code of Ethics

Equens in Italy is subject to the Italian Legislative Decree 231/2001 that requires a Code of Ethics.

The Code of Ethics establishes the Principles, Rights and Liabilities of the company and its employees towards stakeholders, employees and partners, clients and suppliers, and public authorities. Through this Code, the company also recommends, encourages and prohibits certain types of conduct that may result in the liability of the Company or in any case that do not comply with the defined ethical principles.

1.1.1 Scope

The Code of Ethics is applicable to the employees, providers of temporary employment, consultants and partners of any kind, agents, representatives and any other parties that act in the name and on behalf of Equens in Italy.

1.1.2 Supervision

The power to monitor compliance with the rules laid down by the Code of Ethics is granted to the Supervisory Body, which is vested with independent powers of initiative and control.

1.1.3 Information

The code of Ethics is available in the public folder at Livelink “**Equens ITA wide zone > Risk Management & Compliance > Compliance**” and also all employees are required to do a mandatory training about the Legislative Decree 231/2001 and the Code of Ethics, formally notified by HR on recruitment.

For more information about the details of the Code of Ethics, please talk to the Risk & Compliance manager Italy.

Annex 5

The Netherlands



In this Annex specific peculiarities are highlighted related to the Dutch regulations in relation to the Code of Conduct.

1.1 Objectives and scope

1.1.3 Code-related questions or concerns

When in the Netherlands questions or concerns occur related to the Code of Conduct and Equens employees want to remain anonymous, the procedure for 'whistle'-blowers' can be used as published on the intranet of Equens. This procedure should be followed when dealing with a suspected abuse.

Read more
on insite

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