



Code of Business Conduct: Janssens Field Services



We at Janssens Field Services all are responsible for the success of our company and therefore need to take our responsibility in a fair and honest way, always treating others like we would like to be treated ourselves. We are all human, and therefore imperfect, but we can never abdicate our responsibilities in achieving the goals that we have set. Should we fail ourselves, we fail our company and vice versa. We can create or destroy value for our stakeholders. This is the responsibility that belongs to us all, this includes you. Treat others as you would like to be treated yourself.

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The following are the basic values of Janssens Field Services BVBA.

We will always be **honest, transparent and create value for our shareholders, customers and staff.**

We live by these values both internally and externally and consistently strive to prove our commitment towards anyone. We regard our shareholders, our employees and our customers as our core-stakeholders and will create value for them in an honest and transparent way. In this way we will strive to **realize** our goals, which we constantly set in a changing business, regulatory and economic environment. We at Janssens Field Services will behave in a **trustworthy, transparent and honest** way. We will focus on delivering products and services which deliver value to all our stakeholders. We will not pursue ventures that do not create value.

We at Janssens Field Services, can only accomplish this if every Janssens Field Services employee, executive, contractor and/or any other person acting on behalf of Janssens Field Services, reflects these values in his/her daily business behavior, not only towards our customers, but to all people, companies or authorities with whom we have dealings. Therefore, every person acting on behalf of Janssens Field Services should always observe the following principles:

A. COMPLIANCE WITH LAWS

Janssens Field Services will transact its business in strict compliance with the UN Universal Declaration of Human Rights and with the laws and legal systems of the country and society in which it conducts its business.

B. COMPLIANCE WITH CONTRACTUAL OBLIGATIONS

In addition to the law, Janssens Field Services takes its contractual obligations to the government, its suppliers, shareholders, employees and others seriously. People signing contracts on behalf of Janssens Field Services or making any other binding commitments have to make sure that they are duly authorized to do so. Janssens Field Services will adhere to its contractual requirements and, unless they are excused, will fulfill all its contractual obligations, provided that they have been contracted by people duly authorized, in an open and honest way.

C. COMPLIANCE WITH STANDARDS OF INTEGRITY AND QUALITY

Janssens Field Services recognizes that it must earn and maintain a reputation for integrity, that includes, but is not limited to, compliance with laws and regulations of the country in which it

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conducts business. Janssens Field Services also recognizes legally contracted obligations.

We at Janssens Field Services will continuously strive to maintain a record of integrity by living up to our commitments; whether they are made to shareholders, employees, suppliers, or the society within which Janssens Field Services conducts its business. These values we never compromise. Any economic or other business reason, which may impact those commitments, will be communicated as soon as possible, taking into account the responsibility we bear, always balancing the different stakeholder's interests and avoiding surprises.

Janssens Field Services, its employees, executives and shareholders, must strive at all times to maintain the highest standards of quality, honesty and integrity. Even the appearance of misconduct or impropriety can be very damaging to Janssens Field Services. Our code of conduct requires each individual to ensure that all Janssens Field Services business transactions are conducted with the utmost honesty, transparency and accuracy. All business transactions should focus on delivering value for our core-stakeholders: the Shareholder, our Employees and our Customers. We will never compromise this transparency.

No unethical practice can be resorted to on the grounds that it is "customary" outside of Janssens Field Services or that it serves other worthy goals.

D. NO DISCRIMINATION

Janssens Field Services employees, executives, contractors, subcontractors and other persons acting on behalf of Janssens Field Services will treat all people with respect and will not discriminate on the basis of race, religion, sexual orientation, intellect, living area, cultural background, mother tongue, disability or any other grounds, not excluding matters of personal perception or private behavior. We at Janssens Field Services, will judge people strictly according to our values and their performance in delivering value for our shareholders, staff and customers. We treat others as we would like to be treated ourselves.

E. NO HARASSEMENT

Employees, executives, contractors, subcontractors and other persons acting on behalf of Janssens Field Services shall not make themselves guilty of any act of sexual or moral harassment or self-enrichment, as defined in the applicable legislation, our labor code and our code of conduct. We always treat others as we would like to be treated ourselves.

F. NO MALICIOUS RUMORS

It is generally accepted that malicious rumors can have a devastating effect on both individuals and

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the company. Therefore, employees, executives, contractors, subcontractors, and other persons acting on behalf of Janssens Field Services or its shareholders, will refrain from spreading unsubstantiated rumors.

We at Janssens Field Services do not do business upon rumors. It is the task of the management to create an atmosphere of trust and transparency in which there is no need for rumors to be spread. Where individuals or others spread malicious rumors that remain unsubstantiated, we at Janssens Field Services shall ensure that action is taken to rectify this situation and to protect the individual. We treat others as we would like to be treated ourselves.

G. CONFLICT OF INTEREST

Employees, executives, contractors, subcontractors and other persons acting on behalf of Janssens Field Services have to be sensitive to situations which could raise questions of potential or apparent conflicts between personal interests and Janssens Field Services' interests. We must be particularly aware of situations where there exists a conflict between the private interests of a person and his/her official responsibilities. Such conflicts can involve government agencies, investments, private companies, present or prospective employees, etc. If any such situation arises, the person involved should immediately take the appropriate measures to resolve the situation. In any case the person involved must inform his/her management and the HR Director / General Counsel immediately in writing of the existence and the nature of the conflict. The HR Director / General Counsel will keep a written, confidential report of these notifications. A copy of such report will be communicated to the shareholders.

H. ANTI-CORRUPTION

As with competition laws, the countries in which we operate have enacted anti-corruption laws that apply to our business activities. A common theme applicable to virtually all anti-corruption laws is that individuals and entities are prohibited from offering or giving anything of value to any governmental or other public official with the intention of obtaining the official's assistance in business matters. The prohibition will apply to any type of payment or gift, regardless of amount or value, if made for the purpose of gaining a business advantage of any kind, and covers payments made indirectly, through a third party, or to a family member or friend of the public official.

Moreover, the definition of "public official" is extremely broad and includes all officials, employees, agents and representatives of any governmental department, agency or branch (including advisors to such agencies and branches), directors, officers and employees of State-owned or controlled companies (including their consultants, advisors, agents and other representatives), political parties, party officials and candidates for office, and officials and employees of public international organizations such as the European Union or the United Nations (including their consultants, advisors, agents and other representatives).

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Anti-corruption rules and regulations are comprehensive and complex. You are required to read, understand and comply with the Anti-Corruption Policy.

Allegations of corruption can do serious damage to our business and reputation. It is essential that we comply with all applicable anti-corruption laws in the conduct of our business. Any director, officer or employee who is found to be violating applicable anti-corruption laws will be subject to disciplinary action which may ultimately lead to dismissal and, if appropriate, criminal proceedings.

I. CONFIDENTIAL INFORMATION

It is your responsibility to maintain the confidentiality of all confidential information you receive or obtain access to in your capacity as an employee, officer or director of Janssens Field Services. Confidential information includes, among other things, any nonpublic information concerning Janssens Field Services, its operations, employees, financial condition or performance, prospects or information that may provide Janssens Field Services with a competitive edge.

Confidential information also includes any nonpublic information provided to us by a third party with the expectation that such information will be kept confidential and used solely for the purpose for which it was shared.

Janssens Field Services confidential information may not be disclosed to anyone unless such disclosure is properly authorized. You should use reasonable care to protect the confidentiality of all Janssens Field Services confidential information. When your employment or position with Janssens Field Services ends, you must return all confidential information to Janssens Field Services.

Confidential information of third parties is usually disclosed to Janssens Field Services pursuant to nondisclosure agreements. These agreements generally restrict our disclosure and use of the subject confidential information. You are required to comply with these contractual provisions, in addition to the Code provisions, with respect to all third party confidential information in your possession or control. You may not disclose, or induce any other employee to disclose, any former employer's confidential information.

J. PROTECTING DATA PRIVACY

We respect the general right to privacy of all individuals regarding their personal data. We adhere to all applicable laws on the use of personal data.

In carrying out our business, you may collect, use or have access to personally identifiable information belonging or relating to our customers, employees or third-party vendors. We are committed to respecting the privacy of any personal data which we process. With the objective of setting high privacy standards, we support a wide interpretation of what constitutes personal data, which we define as all data that relates to any natural person such as an employee or customer, including but not limited to names, addresses, birthdates, billing records, etc. With respect to our

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customers, personal data also includes traffic data, location data, IP addresses and other internet usage data and set-top box data.

If you are in a position which handles personal data as part of your responsibilities, you must be aware of and comply with, local regulations and all applicable Janssens Field Services policies. In general:

- Personal data may only be acquired and processed by lawful means and for lawful purposes and, where required, with the knowledge or consent of the data subject.
- Personal data may be used only for business purposes and only in accordance with applicable law and, where necessary, with appropriate consents.
- There are legal restrictions on transferring personal data to another party. There may be additional legal restrictions on transferring personal data outside its country of origin.

Personal data is to be protected by reasonable security safeguards against such risks as loss, destruction, unauthorized access, or un-authorized use, modification or disclosure. If you learn of a data security breach regarding personal data, you must immediately contact the HR Director.

K. GRATUITIES CONFLICT OF INTEREST AND "KICKBACKS"

Employees, executives, contractors, subcontractors and other persons acting on behalf of Janssens Field Services shall not give, offer or promise anything of value to any government official to enhance relations with that official or the government, regardless of whether that official is in a position to influence any government decision with respect to Janssens Field Services or its activities.

Employees, executives, contractors, subcontractors and other persons acting on behalf of Janssens Field Services shall not give, offer or promise anything of value to any contractor, subcontractor or others for the purpose of improperly obtaining or receiving favorable treatment. Nor shall any Janssens Field Services-employee solicit or accept anything of value from any contractor, subcontractor or others for such a purpose.

An exception can be made for entertainment, meals, refreshments, small gratuities or gifts to the extent that the value of these benefits is low (+/-75 Euro) and it is generally considered acceptable to offer/accept such benefits. An exception also applies if it could reasonably be considered offensive to refuse a gift (even if it is more expensive than 75 Euro). In such case, the gift may be accepted on the condition that the direct manager is promptly informed thereof. All gifts have to be forwarded to the HR Department. The HR Director will decide whether the gift becomes company property or will be distributed in a fair and objective manner among the company personnel.

L. PROPER RECORDING, ALLOCATION AND CHARGING OF COSTS & REPORTING TO SHAREHOLDERS

Care should be taken to ensure proper recording and charging of all costs to the appropriate accounts. All monies should be used solely for the purposes for which they have been budgeted. Budgeted funds may not be re-allocated to other non-budgeted purposes. Reimbursement of costs

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shall be requested only for costs that are reasonable in amount, and which are allowable under contractual provisions or company policies. All accounts, financial reports, expense reimbursements, time sheets and other documents must be accurate, clear and complete. All reporting to shareholders should be transparent and in strict accordance with generally accepted accounting standards (GAAP). Any discrepancies should be pointed out in an open and transparent way.

M. COMPLAINTS & NOTIFICATIONS

All complaints and all notifications under this Code (in particular notifications of conflicts of interests) have to be made to the HR Director or General Counsel. They provide advice on the application of this Code and other Janssens Field Services policies and report to the Chief Executive Officer on the application of the principles set forth in this Code. The HR Director together with the CEO will be responsible for the application of this Code. Should a complaint be directed against one of these individuals, an employee is entitled to address any one of the other persons; or if she or he thinks that they are colluding, approach the shareholders of the company directly, detailing the issue in an open and transparent way as well as substantiating the misconduct with a copy to the person /persons involved. Should the employee feel threatened, he/she is free to report without any copy to the persons involved. All complaints will be examined and, if necessary, action will be taken against those who have violated this Code. However any unfounded complaints Janssens Field Services on malicious and unsubstantiated rumors will also be investigated and may lead to sanctions being imposed. No employee however needs to fear expressing fair and substantiated opinions supported by facts.

N. INTERPRETATION

In any instance where the Janssens Field Services policies or the provisions of this Code of conduct appear difficult to interpret or apply, the person concerned should contact the persons above him/her in the hierarchical line in order to obtain clarification. Additional assistance can be obtained from the HR Director, CEO or other members of the direction committee.

O. INDIVIDUAL RESPONSIBILITY

Every employee, executive, contractor, subcontractor and any other person acting on behalf of Janssens Field Services is responsible for conduct consistent with this Code and with Janssens Field Services' policies. People having management or supervision positions must assume responsibility for ensuring that their conduct and the conduct of those they supervise complies with this Code.

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P. CONSEQUENCES OF VIOLATION OF JANSSENS FIELD SERVICES POLICIES

Each person is responsible for ensuring that his or her own conduct and the conduct of anyone reporting to him or her fully comply with this Code and with Janssens Field Services' policies. Violations will result in the taking of appropriate disciplinary action up to and including discharge from employment or termination of contract. Conduct representing a violation of this Code may, in some circumstances, also subject an individual to civil or criminal charges and penalties.

Q. COMPLIANCE WITH POLICIES AND PROCEDURES

Janssens Field Services has developed several policies and procedures to ascertain that its customers, suppliers and employees are being treated fairly and equally. It is the responsibility of each employee, executive and contractor to adhere to these policies and procedures.

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