



CODE OF CONDUCT

DOCDATA

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DOCDATA NV is an international group of companies with two 'lines of business' consisting of the e-commerce service company Docdata and the technology company IAI industrial systems. Entrepreneurship is encouraged within the Docdata group and should add value to the entire line of business. Our quality is to provide reliable services and high tech products. Docdata wants to create a challenging and inspiring working environment for its employees, where integrity, reliability and entrepreneurship are important.

The rules and principles which Docdata and individual companies have to apply in their business, have been stated in this Code of Conduct. This Code of Conduct applies to the Docdata group and all of its group companies and employees (the Group). The Management Board of DOCDATA N.V. is responsible for propagating and raising the Code of Conduct to all employees within the Group and supervise the compliance with this Code. The daily responsibility is delegated to local management and employees are tackled about his or her conduct in case of violations. For serious violations, disciplinary measures are taken, ranging from a discussion to a summary dismissal and / or reporting to the competent authorities. This Code of Conduct contains a general statement and can not possibly provide for every situation. Every employee has a responsibility to determine whether his actions comply with this Code of Conduct and in doubt, consult with his supervisor.

The Code of Conduct was adopted by the Management Board of DOCDATA N.V. and approved by the Supervisory Board on 3 December 2009. This Code of Conduct shall enter into force on 1 January 2010.

Core values

The core values of the Group are the pillars for this Code of Conduct and are the basis for the actions of the whole Group.

Customer orientation

The customer requirements are key. We deliver our clients technically advanced products, services and solutions for successful business. The success and satisfaction of our clients contribute to our success and long-term growth and profitability.

Service commitment

The quality of our products, services and solutions should be focused on the customer requirements. The quality must be secured in all aspects of our business.

Flexibility

We see flexibility as a requirement for rapid response to customer requirements, market developments and new technologies. Therefore we ensure a healthy flexibility of our organization and also expect a flexible attitude of our employees.

Innovation

The development of new or improved products and services is essential for the continuity of our company. We always try to be a step ahead with our competitors. We would like to encourage and utilize the creativity of our employees as optimal as possible.

Entrepreneurship

Good entrepreneurship is characterized by a focus on people, customers and results. We encourage good corporate citizenship within the Group so that the desired objectives for the entire Group can be realized.

Professionalism

Our professionalism creates confidence for customers and relationships. All employees should be aware of the consequences of their actions with each other and towards customers and relationships.

Rules of Conduct

Integrity and justice

Integrity and justice are the principles for all business contacts of employees, both inside as outside the Group. Employees are not permitted to provide or accept gifts or presents as a result the business and/or objectivity of decision making can be suspect to stand. Providing or receiving (free) services or products that can be considered as bribery, bribes or redemption is prohibited. Gifts of money or gifts that can be converted into cash are always unacceptable. In case of doubt an employee should consult with his supervisor.

Contacts that could lead to, or could create the appearance of conflict of interests or conflicts between business and private interests, should be avoided.

Employees

The Group strives for a safe and professional working environment for all employees. All employees of the Group should feel comfortable in their working environment which supports teamwork and creativity. We focus on a working environment where everyone treats each other with dignity and respect. Employees are recruited and assessed on their merits regardless of race, colour, religion, sex, age, national origin, sexual inclination, marital status or disability. The Group tolerates no form of intimidation, discrimination, abuse of power or harassment. Personal information of employees is kept secure and confidential and treated in accordance with the requirements under the law.

Subject to prior written permission of a supervisor, the employee is not allowed to carry any form of extra duties, paid or unpaid, in parallel to their employment. This prohibition also includes commissionerships and executive functions.

Health, safety and environment

No accidents, no injuries and no damage to the environment are the crucial targets within the Group, both in own locations as at locations of customer and relations where our staff is active. All employees should be familiar with the safety regulations and the exposure to risks should be avoided.

Business and government relations

Employees must treat fairly and lawful and avoid conflicts of interest or avoid even the semblance of conflicts of interest. The conduct of employees should be focused on the long term interest of the Group. It is open to our employees to develop personal, social or political activities as long as this does not harm the loyalty and objectivity towards the Group. Potential (semblance) of conflicts of interest need to be announced to the supervisor who is responsible for approval.

Employees are not allowed to make private appointments with individuals or companies outside the Group with whom they have a business related working relationship as well.

Employees who (partly) work abroad (or work with business partners abroad), must be aware of and comply with all relevant national and international laws and regulations. In the event that legal advice is required, a reputable law firm will be called in after approval of the Management Board of DOCDATA N.V. The Group operates in many different countries and often works together with local authorities. We do not participate in political partisan activities and make no political contributions without prejudice to the right of our employees to develop personal political activities. We stay away from bribery or corruption.

Information and confidentiality

All employees have the responsibility and the (legal) duty to preserve and protect physical, intellectual and financial property of the Group in the working environment at the premises of the Group. Data, records, reports, books and digital data carriers should be used only in the interest of the Group. Without explicit prior permission from a supervisor, an employee is not allowed to provide any of such, in any form, to another party.

Our digital systems are critical for our operations. Employees and if applicable third parties with (temporary) access, must be careful that the digital systems are used in the interest of the Group taking into account confidentiality and privacy laws. All computer hardware and software purchased by the Group or allowed to use by the Group, should be used primarily for business purposes. After working hours laptops and external data carriers should be switched off and stored in a lockable space.

Limited and occasional personal (private) use of digital systems is permitted but should not hamper the business or damage the reputation of the Group, or lead to a disproportionate burden of the IT infrastructure. The digital systems allowed for personal use are not allowed to be used for paid (online) services or activities which could be offensive to others. It is not allowed to consciously visit websites with pornographic, racist or otherwise discriminating content and websites with unlawful transactions like FTP-sites, peer-to-peer networks, usenet and hackerforums unless the Management Board of DOCDATA N.V. decided this is necessarily for the exercise of the function.

The Group underlines an open and clear communication with employees, customers, suppliers and shareholders. Therefore, regular information on relevant activities, developments and financial results are published.

Compliance

Everyone in the Group has his own responsibility for complying with this Code of Conduct and all other internal regulations and relevant laws and regulations even though not explicitly mentioned in this Code of Conduct. If in doubt, the supervisor needs to be contacted immediately and where appropriate permission needs to be obtained for certain transactions.