

CODE OF BUSINESS ETHICS



As a signatory of the United Nations Global Compact, MCI is committed to acting ethically in all aspects of our business, maintaining the highest standards of honesty and integrity. This Code of Business Ethics builds upon MCI's Core Values, and sets the minimum expectations for employee behaviour and actions taken on behalf of the company and its clients.

MCI requires all staff members to read, understand and comply with this code.

1. We respect the law; complying with international and national laws, client Codes of Conduct and customs and traditions of the countries in which we operate.

2. We work fairly; in an open and transparent manner with our colleagues, clients and suppliers. We compete vigorously but honestly observing all competition and anti-trust laws.

3. We act responsibly; giving appropriate consideration to the impact of our work and will not undertake work which is intended or designed to mislead, including in relation to social, environmental and human rights issues.

4. We show respect; treating our colleagues, clients and partners with dignity and courtesy. We do not tolerate sexual harassment, discrimination or offensive behaviour of any kind, which includes the demeaning of individuals through words or actions, or the display or distribution of offensive material.

5. We believe in people and thrive on diversity; selecting and promoting our staff on the basis of their merit and qualifications, without discrimination or concern for race, religion, national origin, colour, sex, sexual orientation, gender identity or expression, age or disability.

6. We work ethically; MCI does not tolerate bribery or corruption. We promote and support international and local efforts to eliminate corruption and financial crime. We only offer and accept gifts, entertainment or personal favours if their value and frequency is consistent with MCI's policy and the local business culture.

7. We avoid conflict of interest; by always acting in the best interests of MCI and avoiding any personal preference or advantage. This includes situations where personal, family or financial interests conflict with those of MCI, or where an employee holds an interest in an organisation seeking to do business with the Group. When working with organisations who compete we apply the "Chinese Wall" concept ensuring that we deploy different teams per client, and ensure client data is protected and only accessible by authorised sections.

8. We protect assets; by handling and protecting client, delegate and employee data, intellectual property and assets with care and in accordance with national laws and industry codes.

9. We support human rights; and shall purchase no products, or support in any way, business that harms children, benefits from child labour or allows for human trafficking.

10. We work safely; understanding that it our responsibility to follow procedures and take adequate steps to prevent accidents or injuries occurring in the course of work.

11. We care about health; and promote the wellbeing of each other, our partners and clients. We do not use, possess or operate under the influence of alcohol, drugs, medications or any other substance, in a way that could interfere with a safe and effective work environment while performing MCI business.

12. We take care of the earth; aggressively supporting MCI's Sustainability Policy of conducting our business in order to conserve natural resources, manage waste, protect and restore the natural environment and improve efficiency.

13. We take care of the community; supporting the social and economic development of the communities in which we operate.

While this Code provides a broad range of guidance, it cannot address every situation that we are likely to encounter. As a result, this code is not a substitute for our responsibility and accountability to exercise good judgement and ethical behaviour.

When in doubt about a violation of this policy or the best course of action in a particular situation, employees should speak up and communicate directly with the MCI Ethics Committee: ethics@mci-group.com. All conversations will be treated confidentially.