

CODE OF CONDUCT

Date: March, 3th 2014

- A. THE CODE OF CONDUCT** is an express statement of its values, principles and standards of conduct which are to guide behaviour of all officers and employees of the SYSCOM 18 in the performance of their work.
- B.** The CODE guarantees the application of the Company's commitments, its compliance with human and labour right, and integration of the people in the Company.
- C.** The purpose of the CODE, which aims to share with all stakeholders the Company's values and principles, is:
- To develop the models and standards of professional, ethical and responsible behaviour which are to guide all of the members of the boards, the management stuff and the all employees of the SYSCOM 18 in the discharge of their duties.
 - To prevent criminal behaviour and other illicit conduct by the individuals bound by this CODE in the performance of their work.
 - To establish the monitoring and control mechanism necessary in order to guarantee compliance

BASIC PRINCIPLES OF BEHAVIOUR

1. RESPECT FOR THE LAW

All the people who work in the SYSCOM 18 Company shall maintain during the performance of their duties strict respect for the legal provisions in force in all of the areas in which the Company operates.

The actions of an officer in breach of the law or any indications or orders of this nature given by an officer do not relieve the employees who follow such indications or orders from their responsibility.

No order involving an infringement of a legal provision should be obeyed. Employees can report the existence of orders of this kind, through the cannels established, in a confidential manner.

Any person bound by this CODE who is charged or indicted in a criminal proceeding on account of an activity associated with his or her work must inform the Prevention Committee Coordinator as quickly as possible.

2. ETHICAL INTEGRITY

Personal integrity and professional ethics are invaluable assets for the SYSCOM 18.

For the reason, all of the officers and employees of the Company must perform their tasks with objectivity and professionalism.

3. RESPECT FOR HUMAN RIGHT

All actions by the Company and by the individuals belonging to it shall be governed by scrupulous respect for the Human Rights and Civil Liberties included in the Universal Declaration of Human Rights.

GENERAL STANDARDS OF CONDUCT

1. FURTHERING THE REPUTATION OF THE COMPANY

SYSCOM 18 has a solid reputation thanks to its extensive experience and its technical team, trustworthy and loyal to the Company, committed to the values and norms which embody the culture of SYSCOM 18.

2. OPTIMUM WORKING ENVIRONMENT

SYSCOM 18 strives to create working environments where trust and respect for the dignity of individuals, cordiality and the effort of teamwork prevail. The company expressly prohibits any and all abuse of authority, as well as any other conduct capable of generating an intimidating, offensive or hostile working environment.

All officers and employees of the SYSCOM 18 shall contribute towards maintaining a pleasant, gratifying and secure working environment that will encourage people to give the very best they have to offer.

3. EQUAL OPPORTUNITIES AND NONDISCRIMINATION

SYSCOM 18 guarantees equal opportunities and is committed to providing the means to help all of its employees in their professional and personal development. Likewise, it undertakes not to allow any kind of discrimination for reason of nationality, gender, race, religious beliefs, sexual orientation, political opinions, social origin, disability or any other circumstance capable of being a source of discrimination. All officers and employees shall contribute to generating a diverse and integrating working environment and adopt an active attitude in favour of integration, and further a solid corporate identity.



4. PROFESSIONAL DEVELOPMENT AND TRAINING

SYSCOM 18 undertakes to provide the means for contributing to the education, training and updating of the knowledge and skills of the employees for the purpose of facilitating their professional advancement and of adding the value for the customers, shareholders and society.

5. ERADICATION OF CHILD AND FORCED LABOR

SYSCOM 18 subscribes to and promote the observance of Human Rights and avoids working with organizations that violate such rights. For this reason, the Company is committed to observing all the provisions and recommendations in this area as may be issued by the International Labor Organization and the World Compact.

6. OCCUPATIONAL HEALTH AND SAFETY

Health and Safety in the workplace are fundamental aspects to the SYSCOM 18, which is committed to providing the means necessary in order to minimize occupational hazards, both for Company' own personnel as for the personnel of subcontractors. All officers and employees shall actively strive to create and maintain a safe working environment, complying with the legislation in force wherever they carry out their activities and anticipating the preventive measures necessary in order to generate the best possible conditions of occupational health and safety.

7. USE AND PROTECTION THE COMPANY'S INFORMATIONS AND RESOURCES

Information of a non-public nature is considered confidential and classified, whereby the mechanisms necessary for the preserving the integrity , availability and confidentiality of such information is applied. Company staff members who have access to this information shall protect the confidentiality thereof and shall refrain from disclosing or misusing it.

All employees of SYSCOM 18 are responsible for the proper use and protection of the information and resources provided by the company. These include the intellectual property, facilities, the equipment and the financial and material resources.

RELATIONS WITH THE MARKETPLACE

- 1. TRANSPARENCY AND ACCURACY OF NFORMATION.** SYSCOM 18 to conveying information on the Company in a full and truthful manner that will enable shareholders, analysts and other stakeholders to form an objective opinion on the Company.

2. **QUALITY AND INNOVATION.** SYSCOM 18 is committed to attaining the highest levels of quality in its products and services. The Company makes available to its employees its best technical know-how, as well as the best technologies and material resources, and encourages the involvement of its employees in the dynamics of innovation.
3. **RESPECT FOR FREE COMPETITION IN THE MARKETPLACE.** SYSCOM 18 is committed to competing in the marketplace, encouraging free competition to the benefit of the community and consumers, and to complying with the law established in this regard in the countries where it operates, avoiding any actions that may involve an abuse of free competition.
4. **MANAGEMENT OF TRANSACTIONS FOR PREVENTING ILLICIT PAYMENTS.** In order to prevent illicit payments, any and all transactions made with SYSCOM 18 funds:
 - must be connected with the purposes of the Company or with an activity framed within the activities of social responsibility,
 - must be duly authorized,
 - must be properly documented and registered
 - must be a reasonable proportion between the amount disbursed and the service received or the product purchased.
5. **PREVENTION OF MONEY LAUNDERING.** SYSCOM 18 shall only establish business relations with customers and partners on the basis of their professional competence. This measure is intended to prevent money laundering. In those transactions or activities where a risk of money laundering is detected, the Company shall adopt compliance measures based on the identification of the customer and on cooperation with the competent authorities.
6. **RELATIONSHIPS WITH SUPPLIERS AND CONTRACTORS.** The processes for the selection of suppliers and contractors of the SYSCOM 18 are undertaken in terms of impartiality and objectivity. In these processes, all officers and employees of the Company must apply necessary criteria of quality, opportunity and cost, acting at all times in defense of interests of the Company.

In this scope, all officers and employees of the Company are prohibited from offering any kind of illicit advantage to individuals in other companies who are responsible for the procurement or contracting of good or services.



RELATIONS WITH THE COMMUNITY

- 1. PROTECTION OF THE ENVIRONMENT.** SYSCOM 18 is committed to the protection of and respect for the environment and, to this end, carries out its activity under the premise of minimizing negative environmental impacts and of preventing pollution by the improvement of its processes and insuring the appropriate training of its employees and collaborators in the environmental management of the different activities and associated hazards in order to work with maximum efficiency with respect to the use of energy and natural resources and respect the conservation of biodiversity.
- 2. COMMITMENT TO SOCIETY AND SPONSORSHIP.** The SYSCOM 18's commitment to society materializes through the development and promotion of initiatives focused on improving the quality of life of people in the communities where it operates and in the environment of its activity. This commitment is put into practice through social actions and sponsorship actions for each specific case approved in accordance with the Company's internal regulations and in an transparent manner.
- 3. CORRUPTION.** The officers and employees, as well as any other outside individuals who provide their service to SYSCOM 18, in their relations with government administrations, the administration of third countries and of international organizations, must conduct themselves in such a way that they will not lead a public official to violate his/her duties of impartiality or any other legal requirement.

The following prohibitions are derived from this obligation:

- the absolute prohibition of offering any public official, directly and indirectly, any kind of undue advantage for the purpose of leading such official to violate his/her obligations in order to favour our Company.
- the prohibition of any kind of conduct or activity, other than the foregoing, which is intended to illicitly influence the conduct of a public official, leading such official to make or not make a decision that would favour our Company.

Our Company does not approve of the giving of gifts, invitations or business courtesies to public officials that would exceed, in annual terms, a value equivalent to 100 euros. This prohibition also extends to individuals closely related to the public official by family ties or friendship.

CONDUCT CONSULTATION, REPORTING AND DISCIPLINARY PENALTIES

SYSCOM 18 values the reporting of illicit behaviour by its officers and employees very positively. In addition to assisting in the discovery of possible irregularities, such reports are an indispensable tool both for ensuring that code of Conduct becomes fully effective as well as for continuously improving our prevention policy and quality standards.

The officers and employees bound this Code have the obligation of knowing and understanding its content and the values on which it is based. They have the obligation of complying with it and of helping the rest of team to do so as well.

Specific supplementary regulations or regulations implementing this Code of Conduct may be issued, introducing corrective measures for cases of noncompliance.

SYSCOM 18 shall take the legal or disciplinary measures as deemed appropriate, in accordance with the legislation in force, in order to avoid noncompliance with this Code of Conduct and shall be alert to ensure that those who reports breaches of the Code will not be exposed to retaliation.

The conduct consultation and reporting ways are accessible through the website or the email:

- www.syscom.ro / Corporate Social Responsibility/ Code of Conduct
- syscom@syscom18.com

This CODE OF CONDUCT shall enter into effect as from the seventh day following the date of its approval by the General Manager of SYSCOM 18 and shall remains in force until such time as the Board approves its updating, revision or revocation.

GENERAL MANAGER of SYSCOM 18 S.R.L.
ION ANDRONACHE

