



Code of Ethical Business Conduct

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Core Values

Six Core Values provide the foundation for our success and growth at Translations.com:

Integrity

Sense of Urgency

Teamwork

Respect for the Individual

Diversity

Fiscal Responsibility

We are proud that these six core values have helped define us as an organization and provide a framework for our professional conduct. At Translations.com, it's not just about doing a great a job, it's also about doing the right thing.

Translations.com

Business Ethics

Translations.com employees understand innately that it is their obligation to conduct business within the guidelines of all applicable laws and regulations that govern the jurisdiction in which they are operating. However, we also understand that applicable laws do not adequately govern all areas of behavior. Further, as a global corporate citizen, we also recognize that laws and regulations vary internationally on a territory-by-territory basis. Therefore, Translations.com has adopted its own Code of Ethical Business Conduct to govern its conduct around the world.

Recognizing that our Code of Ethical Business Conduct cannot specifically address every possible scenario, we also place an emphasis on understanding and embracing the values upon which the Code is based. Further, our environment is one that fosters communication and encourages individuals within the organization to communicate any question, issue, or matter that causes concern.

Add Business Value to Clients

Translations.com employees understand that our clients are engaging us to assist them in creating business value by delivering a range of business communication services on time, on budget, and with outstanding quality. To that end, we are committed to creating business value for all those customers who turn to us for assistance.

Communications

In utilizing any company-provided means of communication (email, phone, etc.), all Translations.com professionals commit to acting responsibly, professionally, and lawfully at all times.

Company Property and Equipment

Translations.com has security procedures outlined for the treatment of valuable company property such as laptop computers. It is required that all security procedures are followed in the handling of such equipment.

Confidentiality

The nature of our business dictates that Translations.com will take any and all necessary measures to protect confidential information of our clients and other third parties. All employees and contractors execute non-disclosure agreements prior to being permitted access to client information; these agreements prohibit the use of any copyrighted, licensed, or confidential material for any reason other than furthering our clients' interests in the manner in which we were engaged.

Conflicts of Interest

Translations.com professionals understand that there are a myriad of activities, both in the workplace and our personal lives, which could lead to a conflict of interest. It is our obligation to avoid such situations. In the event that a conflict of interest or a situation in which an appearance of impropriety does develop, disclosure to the appropriate managerial authorities is mandatory.

Contracts with Former Employers

Translations.com recognizes that some individuals will start working at the company while they still owe duties such as non-disclosure, non-solicitation, and non-recruitment to their former employers. Translations.com expects and demands that all employees honor their legal obligations.



Equitable Treatment

Each Translations.com employee has the right to be treated fairly and the obligation to treat others fairly. The environment at Translations.com will not tolerate any form of discrimination.

Ethical Professional Conduct

Translations.com is committed to maintaining the highest level of ethical standards in all work-related activities.

Fair Competition

Translations.com believes in fair and free competition. No action will be engaged in that has the consequence of limiting free competition (such as agreements to fix prices). Deceptive, unfair, or unlawful forms of competition or business practice in general will not be tolerated.

GAAP and Financial Reporting

Translations.com demands the utmost in integrity and accuracy with respect to financial reporting, information, and records of any type for any purpose. All accounting procedures must be compliant with Generally Accepted Accounting Principles.

Gift Policy

Good business judgment should be the primary framework for giving or receiving gifts. Translations.com recognizes that there may be occasions in which giving or receiving a gift of nominal value is appropriate, and can create business goodwill. No gifts should be bestowed or received in the expectation of a return act; or in violation of the company policy of either party; and/or applicable laws. Full disclosure of any exchange of property that raises ethical concerns is mandatory.

Harassment

Any verbal or physical harassment will not be tolerated at Translations.com. Harassment based on sex, race, national origin, religion, age, sexual orientation, or disability is illegal and grounds for immediate disciplinary action, including dismissal.

Insider Trading

Translations.com acknowledges that due to the nature of our business, we are likely to be in a position to be exposed to information that is not in the public domain. All Translations.com professionals are obligated not to buy or sell any security based on information they come in contact with in the course of conducting business.

Meritocracy

Business decisions involving personnel at Translations.com will be influenced solely by the skills, ability, attitude, and performance level of the individual employee.

Personal Relationships

Translations.com employees understand that it is inappropriate to engage in any non-platonic personal relationship with any individual in which they have a direct supervisory relationship. Good business judgment should be applied in avoiding any relationship which has the potential to compromise professional objectivity.

Professional Reputation

Translations.com enjoys an excellent reputation and brand name in the business community. Translations.com professionals all have a fiduciary obligation to protect, support, and promote our reputation and brand positioning.

Open Communication

If an ethical question ever arises in the work life of a Translations.com professional, open communication of the issue is not only required, but also the fastest method of resolution. The appropriate individuals to contact include Roy Trujillo, our executive sponsor of diversity and ethics programs; as well as Liam Mahoney, our senior human resources executive.

Sense of Urgency

All employees understand the time-and-materials nature of Translations.com's business. When billing clients for any services by the hour, Translations.com recognizes that it is our ethical obligation to work as quickly and efficiently as possible, without sacrificing quality.

Violence in the Workplace

Translations.com has a zero-tolerance policy for violence or threats of violence in the workplace. Further, it is each professional's obligation to report any incident of workplace violence of which he or she becomes aware.



Corporate Executive Sponsors:

Roy Trujillo 212-689-5555

Liam Mahoney 212-689-1616

Notes



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