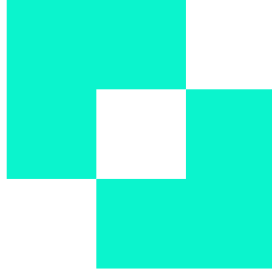
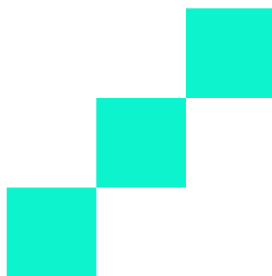
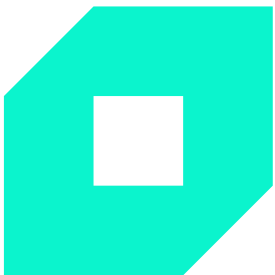


syniverse[®]



Supplier Code of Conduct





1) Our beliefs

Syniverse is *The world's most connected company.*TM We believe in conducting business in a safe, responsible, and sustainable manner. In selecting its suppliers, Syniverse strives to choose reputable business partners who conduct their business in a manner consistent with our commitment to high ethical standards, safe and healthy working environments, the safeguarding of human rights and dignity, the protection of the environment, and compliance with applicable regulations and laws.

2) Our expectations

This Supplier Code of Conduct (“Code”) outlines our expectations regarding workplace standards and business practices of our direct and indirect suppliers in all categories. The standards outlined in this Code are essential factors to our decision regarding new or existing business relationships. Each supplier is responsible for ensuring its employees, representatives and subcontractors understand and comply with this Code.

3) Know your employees

Supplier must conduct pre-placement employment checks consistent with this policy and must ensure any legal/criminal convictions, material delinquencies or substantial debt, or any other matters disclosed in the background check which may render the individual unsuitable for placement at Syniverse have been reviewed and addressed. Supplier also attests the individual assigned to access Syniverse facilities and/or resources such as email and/or network access conforms with this Code.

4) Care about your employees

Supplier shall not engage in forced labor, human trafficking or slavery. Supplier shall not participate in the recruitment, transportation, transfer, harboring or receipt of any persons by means of threat, use of force, or any other forms of coercion, abduction, fraud, deception, abuse of power or position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation. Suppliers shall provide safe and healthy working environments to prevent accidents and injuries. Supplier shall maintain workplaces free from discrimination based on race, color, age, sex, gender, political opinion, national origin, religion, marital status, sexual orientation, disability or genetic information, maternity, membership, affiliation or any other status of the individual unrelated to the ability to perform the job.

5) Engaging third parties

Suppliers will ensure any subcontractors retained to perform services purchased by Syniverse comply with the requirements set forth in this policy.

6) Protect children

Supplier shall ensure no underage labor has been used in the production or distribution of its goods or services. Employees must not be younger than the minimum employment age codified by the respective country or local jurisdiction. In the event no minimum employment age is established, employees must not be younger than the age of compulsory education. If no minimum age for compulsory education exists, employees will not be younger than age 14.



7) Protect the environment

Supplier shall be committed to minimizing its impact on the environment (including but not limited to air emissions, water discharge, toxic substances and hazardous waste disposal) and will fully comply with or exceed all applicable environmental regulations or standards.

8) Compete fairly

Supplier shall not engage in any form of corrupt practices including and without limitation to: extortion, fraud, impersonation, false declarations, bribery, money laundering, or support of or involvement with terrorist or organized crime organizations and/or activities. Suppliers shall not offer bribes, kickbacks, illegal political contributions or other improper payments to Syniverse representatives, government officials or third parties with the intention of obtaining or retaining a business contract or providing an improper advantage.

9) Continuous commitment

In order to ensure continuous focus and commitment to this Code, Syniverse (or a designated delegate) may visit Supplier facilities, with or without notice, to assess compliance with this Code. Supplier shall establish a management system of internal controls designed to identify and mitigate risks that may impact the goods or services purchased from Supplier.

10) Supplier's certification of compliance

By accepting any Syniverse purchase order, the Supplier acknowledges its acceptance of this Supplier Code of Conduct and confirms its intention to comply with its requirements. If you have additional questions about these requirements, please contact Purchasing@Syniverse.com.