



Corporate Code of Conduct



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1. INTRODUCTION

1.1. The Corporate Code of Conduct for the employees of **MBA DEBT COLLECTION SERVICES S. DE R.L. DE C.V.** and all its subsidiaries, owned directly or indirectly the **MBA DEBT COLLECTION SERVICES S. DE R.L. DE C.V.** (hereinafter - the Company) establishes the basic moral and ethical, business principles and rules of conduct, formed on the basis of corporate values and contributing to the execution of the Company's mission.

1.2. Company's mission:

We help to restore the balance of interests of financial system members, by relieving the society of debt problems. Therefore, we contribute to the evolution of the global financial system.

1.3. Corporate values:

1) Person

First and foremost, we see a person behind every debt, every employee or every partner. A person who strives to be happy.

2) Efficiency

Our historical market advantage is to show the best results within the shortest possible time. Our ultimate efficiency and performance ensure long-term cooperation with the world's largest clients and investors, expanding our planning horizons for long decades.

3) Innovations

We are continuously working on new technologies, which tomorrow will completely change people's beliefs about our world. We integrate our unique solutions and apply the best global practices to achieve unrivaled results for all our partners.

4) Trust

Building open and trust relationships with clients, employees, investors and debtors is a major component of our philosophy and one of the key elements of the company's financial success.

1.4. The main corporate values should:

- be realized in the daily life of the Company,
- promote the development of the organization and the achievement of the set goals,
- form standards for professional behavior of employees of the Company.

1.5. Uniform understanding and implementation of the norms of business ethics adopted by the Company is mandatory for all employees, regardless of their position.

1.6. The Top Management and employees of the Company should familiarize themselves with the provisions of this Code and must obey them during the course of their



labor activity, being responsible for their actions or inactions.

1.7. The Corporate Code of Conduct of the Company is designed to introduce high standards of behavior of its employees in any interaction with debtors, borrowers, customers, partners and during internal corporate interaction, and to monitor compliance with these standards.

2. GENERAL PROVISIONS

2.1. This document is a set of principles of conduct that rely on general moral and ethical standards of conduct and the current legislation of the countries of presence.

2.2. Employees of the Company in the performance of professional actions undertake to adhere to the current legal provisions and provisions of this Code.

2.3. The Company makes every effort to ensure that all its employees are properly trained and informed about the Code of Conduct. Compliance with the provisions of this Code is taken into account when assessing the performance of each employee.

2.4. The company provides a high level of professionalism of its employees, which prevents actions that may harm the Company's reputation.

2.5. Employees of the Company follow the principle of information confidentiality that contains commercial secrets, personal data, as well as ensure the confidentiality of any other information that is protected by applicable laws.

2.6. Employees of the Company are responsible for ensuring the confidentiality of information at their disposal through the definition of terms in confidentiality agreements.

2.7. Relations between the Company's employees, customers, government officials, representatives of the media and debtors are based on the principles of integrity, honesty, professionalism, respect, priority of the client's interests, inviolability of obligations, sufficiency of disclosure of necessary information.

2.8. We timely and objectively consider appeals of clients and debtors - the answer is essentially given within 1 to 30 days from the date of application, unless otherwise provided by the legislation of the country in which the Company is registered or other obligations of the Company. The Company's response should be reasoned and, in fact, answer questions and comments on the work of the Company contained in the appeal.

2.9. Only trained individuals/ or ones who have sufficient experience in the field of collection or related areas, such as financial, legal services, are allowed to work with debtors.

3. INTERACTION WITH CUSTOMERS

3.1. Employees of the Company in the interaction with customers are guided by the



principles of trust, respect, reliability and maximum efficiency in their work.

3.2. Cooperation with the client of the Company assumes interaction of the Company's and client's specialists at all stages of the work on provision of services in the field of collection of overdue debts.

3.3. While interacting with customers, we apply an individual approach, in accordance with the needs and goals of the customers.

3.4. Employees of the Company in cooperation with borrowers (debtors) and other individuals are required to act, protecting the interests of customers, as well as in accordance with applicable law.

4. INTERACTION WITH BORROWERS / DEBTORS

4.1. The company operates exclusively in the legal field. Any interaction (communication) of the Company's employees with debtors, their representatives and third parties is carried out exclusively within the laws of the country in which the Company is registered, subject to the rules of morality and the provisions of the sectoral code of ethics.

4.2. The first notification of the assignment of debt / the commencement of work with the Debtor and the requirement to pay the debt must contain a description of such debt. Subsequent requirements for payment of debt must contain the information necessary to identify (credit) the case and the stage it is at, as well as the obligations of the debtor. All correspondence addressed to the debtor must be sent in a closed envelope to the address of his actual residence or to the registration address or to another address specified by the debtor himself.

4.3. During a telephone conversation with debtors, the Company's employees must explain the purpose of the call, as well as identify and clarify the main legal and other issues relating to debt.

4.4. Telephone calls to debtors are made only in the time period established by the legislation of the country in which the Company is registered or by the Customer's requirements on the basis of the Agreement, in fulfillment of which the Company interacts with the Debtor. Deliberate calls at other times (night) are strictly prohibited.

4.5. In a telephone conversation with the debtor, employees of the Company should introduce themselves, provide the name of the organization and explain the purpose of the call; Negotiations should be conducted on the principle of transparency, i.e., full disclosure of information.

4.6. It is strictly forbidden for employees of our Company to introduce themselves as employees of the state or local authorities and / or their representatives, it is prohibited to mislead debtors regarding the amount, nature and grounds of the debt, the consequences



of refusal to pay, and also demand payment of debt, the existence of which is not documented accordingly.

4.7. Employees of the Company are obliged to stop cooperation in the event that it is established that the interaction is carried out with:

- an underage person,
- the organization of healthcare, education, strategically important infrastructures, etc., if there is a risk of violation of operations of such organizations (objects) and the occurrence of adverse consequences that may cause damage to health to an undefined number of individuals, as well as property damage.

4.8. The Company performs audio recording of all cases of direct interaction with debtors - individuals and other individuals in the form of telephone conversations. Storage of such records is carried out within the time limits established by the legislation of the country in which the Company is registered or the Client's requirements on the basis of the Agreement, in fulfillment of which the Company interacts with the Debtor.

4.9. Employees of the Company are obliged to fulfill their obligations in good faith, using reliable information.

The company does not use or support physical and psychological pressure, does not allow insulting or humiliating statements against any individual. Employees of the Company do not have the right to humiliate the dishonor, insult the debtor or use profanity. When interacting with the debtor, the Company employee is obliged to negotiate exclusively with a respectful tone and to avoid familiarity.

- 1.. When hired, all employees of the Company sign an agreement of non-disclosure of personal data. According to this agreement, employees strictly adhere to the confidentiality of personal data, as well as any other information received from the debtor or his representative and disclose it only in exceptional cases provided for by the current legislation of the country in which the Company is registered.
- 2.. In the process of debt collection, we help debtors in finding the best solution to the debt problem and the best way out of the situation.
- 3.. When executing actions via collecting debt, the Company's employees do not apply methods that influence debtors, their representatives, relatives and third parties, which contradict the established legal norms and professional standards of collection activities.

5. BEHAVIOR WITH RESPECT TO COMPETITORS

5.1. The Company undertakes to carry out its activities, adhering to the principles of free, fair competition.

5.2. The company respects the intellectual property rights of competitors, does not



use illegal methods of work, including obtaining information about competitors by dishonest, illegal or unethical methods.

5.3. The dissemination of distorted, incorrect information about the Company or the activities of other collection companies does not correspond to the moral and ethical standards of this Code and positive business practices.

6. THE ORDER OF MUTUAL RELATIONS OF TOP MANAGEMENT AND SUBORDINATES

6.1. The Company's management pays special attention to the conscientious fulfillment of the employer's duties established by the labor legislation.

6.2. The company, within its own capabilities, creates conditions for its employees for professional growth and development, according to the skills and capabilities of the employee.

6.3. The Company takes all necessary steps to familiarize its employees with the provisions of this Code, as well as for their compliance by employees during their employment and after its completion in the Company.

6.4. The Company's management provides employees with equipped workplaces, as well as the necessary materials. The Company's management creates satisfactory conditions for the employee, necessary for the successful fulfillment of his/her obligations.

6.5. The compensation system is based on taking into account the achieved results of each employee's work and their contribution to the overall results of the Company's success as a whole.

6.6. If the employee has not complied with the instructions of the manager, the manager is obliged to take appropriate measures to the employee with a view to ensuring the fulfillment of all orders and tasks thereafter.

6.7. The company creates all conditions for constructive professional relations between the company's managers and employees - this is necessary for the Company's daily effective operation and for ensuring its future development.

7. STANDARDS OF EMPLOYEE RELATIONS

7.1. The ethical behavior of each employee of the Company is a part of their life position and therefore influences their professional and personal successes both during and after the employment relationship.

7.2. Every employee of the Company must:

- Take an active part in the realization of the Company's goals, diligently



fulfilling its professional duties;

- adhere to generally accepted forms of courtesy in communication;
- try to improve their level of knowledge and qualifications;
- be responsible for their own words and actions.

7.3. Communication between employees of the Company should be based on a benevolent basis, respectful of others and observance of generally accepted norms of business etiquette. Profanity, laud/disrespectful tone or gestures are not allowed.

7.4. In the event of conflict situations, employees must take comprehensive measures to eliminate them, if necessary, involve a direct and / or superior leader in resolving the conflict. Participants in a conflict situation should be prepared that, if they fail to find mutual understanding, including engaging colleagues and / or leaders, both sides will bear the consequences.

7.5. Employees of the Company are obliged to behave diligently and correctly in office and out-of-office hours, both in the workplace and in other public places, preventing misconduct that may damage the Company's image.

7.6. Employees of the company should take measures to immediately eliminate the causes and conditions that complicate or impede the normal performance of the work and immediately report such cases to the management of the Company, as well as not perform actions that cause damage to the Company's reputation.

8. FINAL PROVISIONS AND RESPONSIBILITY FOR NON-COMPLIANCE WITH THE CODE

8.1. Employees of the company, regardless of the position held, should treat their duties in an engaged and responsible manner, since a formal attitude towards the performance of their functions prevents the receipt of a meaningful factual result.

8.2. The provision of the Corporate Code of Conduct applies to all employees of the Company, regardless of position and status.

8.3. When recruited, all newly admitted employees must become familiar with the provisions of the Code.

8.4. Each employee is responsible for implementing the provisions of this Code.

8.5. For violations of the provisions of this Code, each employee is responsible, according to the committed violation.

8.6. Violation of the provisions of this Code can be regarded as an action incompatible with the status of an employee of the Company and serve as the basis for applying disciplinary sanctions up to suspension from work.