

United Nations Global Compact COMMUNICATION ON PROGRESS 2012

infeurope S.A.

Period from May 2011 to May 2012

Statement of continued support

infeurope reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

As a professional services company, we are not confronted with many of the issues covered by these Principles, but we endeavour to observe them wherever applicable and to make them part of our company culture and operations.

Stefan Geier and Stefan Zündorf Co-directors, infeurope S.A.





Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights

Principle 2: make sure that they are not complicit in human rights abuses

Assessment, Policy and Goals

As a services company, our people and our policies are fundamental to our success, and we continually seek to ensure that we honour the fundamental rights of our employees, both as individuals and as employees.

Implementation

infeurope has an established code of conduct to which all employees must comply which addresses, among other principles, those of integrity and ethics.

Moreover, the Grand Duchy of Luxembourg has traditionally adopted a legislative strategy which is strongly supportive of human rights and the rights of employees, and we conform fully and willingly to all applicable legislation.

Measurement of outcomes

By virtue of the small size of the company, the predominantly qualified and professional staff working at a senior level, and the nature of our business activity in which human rights issue are uncommon, we have not yet encountered any such issues.

However, we envisage that all such incidents would be formally addressed and recorded.



Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining

Principle 4: the elimination of all forms of forced and compulsory labour

Principle 5: the effective abolition of child labour

Principle 6: the elimination of discrimination in respect of employment and occupation

Assessment, Policy and Goals

Our code of conduct addresses the respect for the privacy of the employee, and prohibits any form of discrimination and harassment.

Equally, we of course conform to all applicable legislation, as noted earlier.

Implementation

A Staff Committee, elected regularly by the employees, exists to offer a platform for dialogue between management and employees. It is through this platform that any issues concerned with labour rights would be formally addressed.

In addition, there are regular meetings between management and staff in which labour-related problems, if any, may be addressed.

Measurement of outcomes

Once again, the nature of our business activity and the predominantly senior and professional staff profile mean that labour rights issues are extremely rare.

Where a labour issue arises, it would be addressed by the senior management of the company in consultation with the staff committee, and the outcome formally recorded.



Principle 7: Businesses should support a precautionary approach to environmental challenges

Principle 8: undertake initiatives to promote greater environmental responsibility; and Principle 9: encourage the development and diffusion of environmentally friendly technologies

Assessment, Policy and Goals

Reflecting the type of work that the company undertakes, ours is an office-based environment heavily dependent on IT services, and consequently we focus our attention with regard to environmental issues on optimising our use of IT and energy. We are also consumers of office products and supplies, and we seek to ensure environmentally acceptable solutions in these areas.

Implementation

To evaluate our energy usage and efficiency, we conducted an energy measurement project in order to understand better our use of energy and how this might be improved. This essentially confirmed that the measures that we had already implemented were more than adequate.

For example, our existing server management policy ensures that idle servers are automatically mounted and shut down according to activity and data traffic. Similarly, all PCs use a standard power management plan. As far as possible, we also buy PCs and other hardware with low energy consumption.

We discourage unnecessary printing of documents and, where printing is necessary, encourage double-sided printing. Also in this regard, we have invested in new printing equipment which, as well as providing higher functionality, is more energy-efficient.

Moreover, we are increasingly using stationery products with less environmental impact. Already, all of our copy/print paper is certified with the European Ecolabel, and is PEFC-certified that it is produced from sustainable forests. We are also progressively moving wherever possible to similarly eco-friendly sources for other items such as binders and folders - of which we have a high consumption.



Transport usage is minimised, where possible, by the use of teleconferencing and videoconferencing, and of virtual classrooms for training classrooms for training.

> With regard to recycling, empty toner and ink cartridges as well as electronic waste are given to a licensed local disposal agent, and empty bottles are returned to the vendor and recycled.

Measurement of outcomes

The energy measurement project has resulted in a detailed audit of energy usage, which will serve as a benchmark for monitoring future usage and the benefits gained from improvements.

In addition, we plan to establish targets for transition to environmentally-friendly products.



Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery

Assessment, Policy and Goals

The majority of our service activities are provided to the European public sector - predominantly the EU institutions and agencies - and to UN agencies, where anti-corruption policy is firmly established, so a commitment to honesty, fair practice and avoidance of conflicts of interests is fundamental to our business.

Implementation

Our standard employment contract forbids our personnel from accepting or offering any gift (monetary or otherwise), to or from our clients and suppliers and, along with the code of conduct, prohibits the divulgence or acquisition of confidential information of infeurope, its clients and its suppliers.

Thus any such action construed as an enticement or a means to obtain an unfair commercial advantage would be considered as a breach of contract and would result in disciplinary action or, in the worst case, dismissal.

Measurement of outcomes

Although the anti-corruption measures described above are well established, corruption is not a significant issue for the company, given the nature of our business and our client base.

Even so, should it arise, it would be treated as a contractual breach, as noted, and formal procedures conformant with Luxembourg law would be invoked and the outcome formally recorded.