

Code of Conduct

The following Code of Conduct shall be binding upon the members of the Debt Buyers & Sellers Group ("the Group") in the conduct of the business of buying or selling debts for the purpose of determining the rights and responsibilities of the members of this Group.

The Governing Committee shall have full power to investigate any complaint against a member of this Group for breach of this Code of Conduct. Any member of the Group who, in the reasonable opinion of the Governing Committee, is found to be in material breach of this Code of Conduct may, at the discretion of the Committee, be expelled, suspended, placed on probation or otherwise reprimanded. Any member of the Group who enters into any arrangement with its creditors, becomes bankrupt or insolvent, or takes or suffers any similar actions in consequence of a debt shall be liable to immediate expulsion from the Group.

The Code of Conduct

Each member of the Group shall:

- 1 Conduct its business lawfully, comply in all material respects with all relevant legislation (including the Consumer Credit Act 1974, the Data Protection Act 1998 and the Administration of Justice Act 1970), current UK best practice and the guidelines and codes of practice issued from time to time by the Credit Services Association Limited and the Office of Fair Trading and abide by all relevant rules, regulations, codes, guidelines or other policies as may be adopted by the Group.
- 2 Ensure that it conducts its dealings with debtors in a fair and reasonable manner and, without prejudice to the generality of the foregoing, that such dealings are conducted so as not to contravene the general principles set out in the UK Banking Code of Practice (in so far as capable of being applied to the relevant member).
- 3 Maintain a high standard of business practice, trade fairly and responsibly and act at all times with integrity.
- 4 Abide where appropriate by the 'Principles of Reciprocity' and Credit Reference Agency (CRA) contracts and agree to provide to the CRAs positive, delinquent and default data on a regular (usually at a minimum monthly, depending on the nature of the product) basis on all accounts within a particular product/portfolio where the necessary legal consents/notifications have been obtained. Access to full data will be granted on those consumer files which include purchased default level portfolios previously reported by an originator at full level on the principle that the purchaser continues to report the required updates to default level data. For the avoidance of doubt, full data may not be used prior to purchase for purposes of pricing or due diligence.
- 5 Avoid practices, advertising or other representations which are likely to bring the Group into disrepute.
- 6 Compete in a fair and reasonable manner, never publicly attacking the reputation of a competitor.
- 7 Ensure that all staff are provided with adequate training and are familiar with, and required to carry out their duties in accordance with, the laws and guidelines under which the business of buying or selling debts is conducted, including this Code of Conduct.
- 8 Not discriminate on grounds of domicile, race, sex, disability or religion against competitors to prevent them becoming members of and participating in the affairs of this Group.
- 9 Limit the use of the name and emblem of the Group to the company or entity for which membership is in effect.
- 10 Take all reasonable steps to protect the reputation of its clients and respond promptly and diligently to all enquiries received.
- 11 Adhere to the terms of any contract or agreement entered into in the course of buying or selling debts.
- 12 Not knowingly misrepresent qualifications, capacity, financial standing, experience and abilities.
- 13 All transactions open to a number of parties should be handled in a fair and transparent manner.

Approved at DBSG Meeting, 20th September 2007