



TECHNICAL SAFETY
CONSULTANTS
— SAFETY GUARANTEED —

BUSINESS ETHICS AND COMPLAINT CODE

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I. Introduction

Technical Safety Consultants Ethics & Compliance Code is applicable to all employees of Technical Safety Consultants. All employees of Technical Safety Consultants are required to read, understand and acknowledge receipt of the Code as a condition of their employment at Technical Safety Consultants.

Business Partners engaged by Technical Safety Consultants are also required to comply with the Business Ethics & Compliance Code's Principles. Business Partners are defined as subcontractors, agents, representatives, consultants, intermediaries, joint venture partners and any other party who is engaged to represent or promote Technical Safety Consultants, or provide outsourced technical inspection, testing, certification and related professional services.

All Business Partners are required to give a written commitment to comply with the Principles of the Business Ethics & Compliance Code and to allow Technical Safety Consultants to periodically monitor their compliance with these Principles.

II. Technical Safety Consultants Compliance Principles

1. Integrity

- ✓ Technical Safety Consultants shall operate in a professional, independent and impartial manner in all its activities.
- ✓ Technical Safety Consultants shall carry out its work honestly and shall not tolerate any deviation from its approved methods and procedures.
- ✓ Where approved test methods make provision for tolerances in results, Technical Safety Consultants shall ensure that such tolerances are not abused to alter the actual test findings.
- ✓ Technical Safety Consultants shall report data, test results and other material facts in good faith and shall not improperly change them and shall only issue reports and certificates that correctly present the actual findings, professional opinions or results obtained.

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2. Conflicts of interest

- ✓ Technical Safety Consultants shall avoid conflicts of interest with any related entity in which it has a financial or commercial interest and to which it is required to provide services.
- ✓ Technical Safety Consultants shall avoid conflicts of interest between Technical Safety Consultants and/or divisions engaged in different activities, but which may be providing services to either the same client or each other.
- ✓ Technical Safety Consultants shall ensure that its employees avoid conflicts of interest with the activities of Technical Safety Consultants.

3. Confidentiality and Data Protection

- ✓ Technical Safety Consultants shall treat all information received in the course of the provision of its services as business confidential to the extent that such information is not already published, generally available to third parties or otherwise in the public domain.
- ✓ Technical Safety Consultants respects the confidentiality and privacy of client's information and ensures processes are in place to adequately protect such information.
- ✓ We treat all information received in the course of the provision of our services as business confidential to the extent that such information is not already published, generally available to third parties or otherwise in the public domain.

4. Anti-bribery

Technical Safety Consultants shall prohibit the offer or acceptance of a bribe in any form, including kickbacks on any portion of a contract payment.

Technical Safety Consultants shall prohibit the use of any routes or channels for provision of improper benefits to, or receipt of improper benefits from, customers, agents, contractors, suppliers, or employees of any such party, or government officials.

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5. Fair marketing

Technical Safety Consultants shall only present itself and conduct marketing, including any comparisons with or references to competitors or their services, in a manner that is truthful and not deceptive or misleading or likely to mislead.

6. Health and Safety

Technical Safety Consultants implements adequate training and procedures to protect the health and safety of its employees, customers, and third parties and monitors incidents with the view of minimising risks in the course of business operations.

7. Fair Labour

Technical Safety Consultants is aware of our social responsibility for our employees and the people, communities, and environments in which we work and shall respect human rights as described in Technical Safety Consultants Code of Conduct.

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III. Technical Safety Consultants Compliance Programme

A. Organization Rules

1.1 Implementation

Technical Safety Consultants have implemented a Business Ethics and Compliance programme. The Code's Principles and associated rules and procedures include standards for technical and professional conduct in the following areas:

- Integrity
- Conflicts of interest
- Confidentiality and Data Protection
- Anti Bribery
- Fair Marketing
- Health and Safety
- Fair Labour

All employees and subcontractors are required to commit to the Code, and receive training to ensure compliance. We encourage transparency and foster a workplace environment where ethical issues can be raised and guidance given accordingly. Our dedicated Compliance Department supports employees and management throughout our organization to ensure a rigorous implementation of our integrity and ethical standards.

Most importantly, we place business ethics and compliance above all commercial considerations. To ensure the effectiveness of the implementation of our Code, we subject our Business Ethics and Compliance programme to an annual independent assessment conducted by the company's external auditors.



1.2 Appointment of Compliance Officer and Committee

Technical Safety Consultants Board of Directors consisting of:

- **A.K. Manaseer – Director of Technical Safety Consultants**
- **Mousa Manaseer – CEO of Technical Safety Consultants**

has approved of the Compliance Programme and have appointed a Compliance Committee consisting of:

- **Mousa Manaseer, CEO**
- **Engr. Dante, Operations Manager**
- **Vinu Jacob, Compliance Officer**
- **Hesham, Deputy Compliance Officer**
- **Sagar, Accounts Manager**
- **Bianca, HR**

and the following senior executives to ensure the upholding/ execution of the Programme throughout Technical Safety Consultants:

- **Vinu Jacob, Compliance Officer**
- **Hesham, Deputy Compliance Officer**
- **and the external auditor:**

1.3 Human Resources

- ✓ Recruitment Prior to job offer, prospective employees of Technical Safety Consultants will be informed of Technical Safety Consultants's Compliance Programme (Principles and Rules).
- ✓ Employee commitment Technical Safety Consultants shall ensure that:

(a) Each employee will be provided with a copy of the Technical Safety Consultants's Compliance Principles and Rules and requested to sign a declaration that it has been received, read and understood. A record will be kept in the file of the employee.



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(b) The following officers will be requested to sign a declaration each year that they are updated and follow these codes:

- **Vinu Jacob, Compliance Officer**
- **Hesham, Deputy Compliance Officer**

Technical Safety Consultants Rules will make it clear that employees will not suffer demotion, penalty or any other adverse consequences arising from strict implementation of the Programme even if it may result in a loss of business.

1.4 Training

All employees, including managers, of Technical Safety Consultants will be given a copy of the TIC Council Compliance Training Guide. A Record of course completion shall be kept in the file of each employee. Each employee has to undergo compliance code training.

1.5 Consultation on Code development

Technical Safety Consultants' employees will have the opportunity to provide input on the development of the Programme during performance evaluations, staff training sessions or at review meetings or directly to the Compliance Officer.

1.6 Employee performance evaluation

Technical Safety Consultants will ensure that each employee has an on-going understanding of Technical Safety Consultants Compliance Programme during employee performance evaluations.

1.7 Employee “help lines”

All employees can contact quality@technical.global

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1.8 External communications

Technical Safety Consultants will ensure effective external communications by:

- ✓ Ethics & Compliance Code is published on <https://www.technical.global/> and copies of the Code are available from any of Technical Safety Consultants offices.
- ✓ Enquiries, complaints or feedback from relevant interested parties may be made via the web site, email (info@technical.global/quality@technical.global) or to the General Manager of Technical safety Consultants.

1.9 Reporting of violations

Technical Safety Consultants's employees are encouraged to report details of violations or suspected violations to either Technical Safety Consultants's Compliance Officers or their nominated delegate(s).

The reporting employee shall be fully protected against any form of reprisal unless they acted maliciously or in bad faith. If requested, the employee's anonymity shall be protected to the extent reasonably practicable.

Technical Safety Consultants's employees will be required to report any solicitation for, or offer of, an improper payment or advantage coming to their knowledge in the same manner.

1.10 Member's investigations and sanctions

Technical Safety Consultants's Compliance Officers or their nominated delegate(s) shall initiate, where appropriate, an investigation into any violation of the Programme reported to them or coming to their knowledge.

Technical Safety Consultants will maintain a documented procedure for the handling of investigations and sanctions which shall include requirements for:

- (a) The maintenance of records of all reported violations and subsequent actions taken.
- (b) The alleged perpetrator of such violation to have the right to be heard.



(c) Technical Safety Consultants management or Compliance Committee is to decide the appropriate corrective and disciplinary measures to be implemented if a violation has been established. These measures may include a reprimand, demotion, suspension or

(d) The Compliance Officer to receive progress reports from his/her nominated delegates and/or the management in the locations concerned and prepare periodic summary reports for the Compliance Committee on investigations, violations established and the implementation of corrective actions and disciplinary measures.

1.11 Effectiveness of the Programme Implementation

Management Declarations

Technical Safety Consultants requires its Senior Managers throughout its organisation to prepare and sign, on an annual basis, a Compliance Declaration which is based on the template contained in Annex A to the TICC Compliance Guidelines on Implementation. These Compliance Declarations are to be received, in respect of all applicable locations and/or activities, by the Compliance Officer by the 31st of January of each year. The Compliance Officer submits an annual summary report to the Compliance Committee.

Internal audits

Technical Safety Consultants will require our nominated internal auditors, as part of our internal audit plan, to verify that Technical Safety Consultants Compliance Principles and Rules have been implemented within our organization and that the Management Declarations.

The Compliance Officer and/or Compliance Committee shall take follow-up actions where appropriate.

1.12 External Examinations

1.12.1 Frequency

The effectiveness of the implementation of the Programme shall be examined at least annually by Technical Safety Consultants appointed independent external audit firm.



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1.12.2 Independent External Audit Firm

Technical Safety Consultants independent external audit firm appointed to carry out this examination:

- (a) shall be (i) either the firm engaged for the audit of Technical Safety Consultants (consolidated) financial statements or another external audit firm entrusted with auditing Technical Safety Consultants Programme and, in either case, (ii) a member of a recognized national professional accountancy organization or approved by the TIC Council Director General as being appropriately qualified for the verification of Technical Safety Consultants Programme, and (b) the external auditor shall be 100% independent from Technical Safety Consultants business.

1.12.3 Notification to TIC Council of Technical Safety Consultants appointed external audit firm(s)

Prior to the appointment of the external audit firm(s), or any subsequent proposed changes thereof, Technical Safety Consultants submits details to the TICC Director General for confirmation of compliance with TICC requirements.

Scope of verification

Technical Safety Consultants carries out the following:

Submission of documents for verification to TIC

Technical Safety Consultants submits the following documents:

- 1) Technical Safety Consultants Business Ethics & Compliance Programme, as well as policies in relation to each Principle (if separate).
- 2) The Terms of Reference for the Compliance Committee including the specification that the Compliance Committee is responsible for overseeing the Compliance Programme.
- 3) List of members of the Compliance Committee (including job title)
- 4) Business Ethics & Compliance Programme training material
- 5) Material helping the awareness of the employee Help Line.

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- 6) Material encouraging employees to report details of violations or suspected violations and to whom they can report.
- 7) Screen print of Technical Safety Consultants web site where:
 - The Business Ethics & Compliance Principles are explained.
 - An interested party can make inquiries, complaints or feedback.
- 8) Documented procedure for the handling of investigations and sanctions.
- 9) Policies relating to confidential business information (information security policy, confidentiality policy).
- 10) Procedures for health & safety incident reporting and investigations.
- 11) Procedures for due diligence for initiating or renewing relationships with intermediaries and joint venture partners.
- 12) Procedure for contracting with intermediaries and joint venture partners and related template(s) of contract / terms & conditions with a new / renewed intermediary or joint venture partner.
- 13) Template of the annual management declaration based on the template in Annex A of the TICC Guidelines for Implementation.
- 14) Scope of Internal Audit Plan that includes the review of the implementation of the Business Ethics & Compliance Code.
- 15) Annual summary reports prepared by the Compliance Officer covering statistics or confirmations to show compliance with Technical Safety Consultants's procedures and policies, as specified in Annex B of the TICC Guidelines For Implementation.
- 16) Annual report of the results of the agreed upon procedures.

When submitting the documents, Technical Safety Consultants assesses whether the evidence being submitted meets all the evidence requirements, as detailed in Annex B of the TICC Guidelines for implementation, any deviation from which is explained in writing.



Unless otherwise stated, documents are re-submitted only if they have been updated. All documents are reviewed and updated at least every three years or whenever there is an update to Technical Safety Consultants Business Ethics & Compliance Code and Programme and/or guidelines issued by TICC.

Request audit firm to carry out agreed upon procedures

Annually, Technical Safety Consultants requires its independent audit firm to carry out agreed upon procedures for the following areas:

- I) Understanding of compliance code by each new employee
- II) Attendance of Business Ethics & Compliance Programme training course(s) by employees
- III) Employee Help Line (or equivalent - e.g. designated email) to raise queries and / or issues relating to the Business Ethics & Compliance Programme
- IV) Reviewing and taking actions on enquiries, complaints and feedback from interested parties
- V) Understanding of the confidentiality requirements by each new employee
- VI) Schedules prepared for political contributions; charitable contributions and sponsorships; expenditures relating to gifts, hospitality and expenses; and Intermediaries' remuneration
- VII) Monitoring of annual compliance declaration submissions by Senior Managers

The specific agreed upon procedures are detailed in **Annex C** to the **TICC Guidelines for Implementation** document.

Audit firm's Report

Technical Safety Consultants requires the audit firm to produce a Report showing the results of the agreed upon procedures using the template contained in Annex C to the TICC Guidelines for implementation.

Technical Safety Consultants submits its audit firm's Report to TICC within six months of the end of Technical Safety Consultants financial year.

1.13 Intermediaries, Joint venture partners, Supplier & Subcontractor

- ✓ Technical Safety Consultants will conduct due diligence of prospective joint venture partner(s)/Intermediaries/Subcontractors.

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- ✓ Technical Safety Consultants shall not deal with any prospective joint venture partner(s) which is known to be involved in bribery.
- ✓ Technical Safety Consultants will monitor the Subcontractors's compliance with Technical Safety Consultants Principles and Rules through monitoring of its conduct and, as appropriate, periodic verification.
- ✓ Technical Safety Consultants will use its best endeavours to require its Subcontractors, with which it entered into Agreements prior to the date on which this Code comes into force, to operate the Subcontractors in conformance with Technical Safety Consultants Principles and Rules.

1.14 Complaints and Disciplinary Procedures

Complaints concerning alleged non-compliance with this Code by other members should be lodged with TIC Council in accordance with the TIC Council Complaints and Disciplinary Procedures. Technical Safety Consultants will refrain from submitting such complaints to other parties unless it is necessary to do so to protect Technical Safety Consultants reputation.

1.15 Accounting and book keeping

Technical Safety Consultants maintains accurate books and records which properly and fairly document all financial transactions. Off-the-books accounts are prohibited.

1.16 Health & Safety

Technical Safety Consultants records and investigates all reported Health & Safety incidents and undertakes corrective measures where appropriate

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B. Integrity Rules

1.1 Non abuse of tolerances

- ✓ Technical Safety Consultants shall ensure that where approved test methods make provision for tolerances in results, such tolerances shall not be abused by employees to alter the actual test findings.
- ✓ Technical Safety Consultants shall provide guidance to their employees for dealing with clients who expect Technical Safety Consultants to abuse tolerances to obtain acceptable results.

1.2 Conflicts of interest

In order to avoid conflicts of interest, or the appearance of conflicts of interest, in Technical Safety Consultants's business transactions and services, the following requirements shall be taken into account:

2.2.1 Technical Safety Consultants will avoid conflicts of interest between:

(a) Technical Safety Consultants and any related entities in which Technical Safety Consultants has a financial or commercial interest and to which it is required to provide services.

(b) Technical Safety Consultants s companies and/or divisions engaged in different activities but which may be providing services to either (i) the same client or (ii) each other.

2.2.2 Technical Safety Consultants's employees shall not, directly or through relatives, friends or intermediaries, acquire an interest in a supplier, a client or a competitor of Technical Safety Consultants, except for the acquisition of shares of a client, supplier or competitor on a public stock exchange, and then only to an extent which does not grant significant influence over the affairs of the client, supplier or competitor and which does not make the employee unduly dependent on its financial fortunes.



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2.2.3 Technical Safety Consultants's employees shall not hold any position with a competitor or client.

2.2.4 Technical Safety Consultants's employees shall not conduct any company business with any member of their family or with an individual or organization with which they or their family is associated. Technical Safety Consultants's employees shall not employ a member of their family without approval of Technical Safety Consultants's management.

C. Anti-bribery Rules

1.1 Compliance with laws

Technical Safety Consultants's will ensure that the Principles and Rules of our Programme meet the requirements of this Code and local laws relevant to countering bribery in all the jurisdictions in which Technical Safety Consultants operates.

1.2 Analysis of risks

Technical Safety Consultants's Compliance Committee and/or senior executive, or his/her delegate, in each country of operation shall organise periodic reviews to assess bribery risks and determine appropriate control measures. Such reviews shall be systematically conducted:

- (i) Prior to the commencement of a new service or the start up of operations in a new country and
- (ii) Whenever a significant breach of Technical Safety Consultants's Principles and Rules occurs which warrant a review of the existing control measures.

1.3 Political contributions

In order to ensure that Technical Safety Consultants and its employees, agents or intermediaries shall not make direct or indirect contributions to political parties, organizations or individuals engaged in politics, as a way of obtaining advantage in business transactions.



1.4 Charitable contributions and sponsorships

Technical Safety Consultants ensure that charitable sponsorships are not being used as subterfuge for bribery.

1.5 Facilitation Payments

Facilitation Payments are defined as small payments made to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has legal or other entitlement.

Recognizing that facilitation payments are form of bribery, Technical Safety Consultants shall work to identify and eliminate them.

1.6 Gifts, hospitality, and expenses

To ensure that the offer or receipt of gifts, hospitality or expenses does not:

- (a) Influence, or be perceived to influence, a contractual or material transaction or
- (b) serve, or be perceived to serve, as an inducement to act in breach of duty, Technical Safety Consultants shall implement the following:

Technical Safety Consultants Compliance Committee shall set limits / guidelines on the value of gifts, hospitality or expenses that may be given without special authorisation from Technical Safety Consultants Compliance Committee.

Guidelines will be provided to employees on the circumstances under which (a) gifts, hospitality or expenses may be received and (b) gifts may be kept by employees or should be surrendered to Technical Safety Consultants management for disposal.

Technical Safety Consultants is to give gifts only with the approval of the Managing director, however, within the limitation set forth by the TIC Council Compliance Code.



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1.7 Accounting and bookkeeping

Technical Safety Consultants shall maintain accurate books and records which properly and fairly document all financial transactions. Off-the-books accounts shall be prohibited.

D. Fair Marketing Rules

Technical Safety Consultants shall provide guidelines to employees, agents and intermediaries to ensure that: a. they conduct marketing (including comparisons with, or references to, competitors, competitors' services or third parties) in a manner that is truthful, is not deceptive or misleading or likely to mislead, and is consistent with applicable laws; and they present Technical Safety Consultants in a fair manner; and Technical Safety Consultants presentations and publications accurately and unambiguously reflect Technical Safety Consultants network and affiliations, resources / capabilities, experience and services provided.

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IV. ANNEX A: Management Declaration Template

Confidential

.....(name of Member)'s Compliance Programme

Management Declaration for the year ending.....20....

To:.....(name of Member's Compliance Officer or

Nominated delegate)

<p>Name of Manager:.....Job Title.....</p> <p>Locations and/or activities covered by this Declaration:.....</p> <p>.....</p> <p>.....</p> <p>.....</p>
--

I.....(name of Manager) do hereby declare that in implementation of.....(name of Member)'s Compliance Programme for the year ending 20.....in each of the locations and/or activities, as listed above, falling under my area of responsibility:

1. To the best of my knowledge I, and the member of staff reporting to me, have complied in all respects with the compliance programme.
2. I have verified that the Compliance Programme has been distributed to each Employee who had not previously received them.
3. I have fully and completely reported to the Compliance Officer any violation or suspected violation of the programme, including any solicitation or offer of any improper payment or advantage, which has come to my knowledge;
4. I have fully and completely implemented all corrective and disciplinary actions required by the
5. Compliance Committee in respect of any violation of the programme.

Place.....Date.....

Signature.....





V. ANNEX B Proforma Assurance Report of External Audit Firm

“Assurance Report on Technical Safety’s Compliance Programme”

1. Purpose of assurance review

We have performed review procedures on the management and reporting processes of the Compliance Programme Technical Safety Consultants over the year.....or the period..... to..... to determine whether these incorporate the requirements of the TIC Council Compliance Code dated..... and whether this has been adequately implemented within Technical Safety Consultants’s organization.

Technical Safety Consultants is responsible for the development and maintenance of the management and internal reporting processes of the Compliance Programme. Our responsibility is to report on the management and reporting processes of the Compliance Programme based upon our review procedures.

2. Scope of assurance review

The scope of our review procedures was to:

- (i) Verify that the current Compliance Principles and Rules of Technical Safety Consultants remain identical to those submitted to, and approved by, TIC Council.
- (ii) Verify that Technical Safety Consultants has established a Programme incorporating the requirements of the Code.
- (iii) Observe the existence of internal management systems, processes and controls in respect of (a) alleged violations (b) Compliance Committee records and (c) compliance training.
- (iv) Review the following consolidated management statements:
 - Political contributions
 - Charitable contributions and sponsorships
 - Extraordinary expenditures relating to gifts, hospitality and expenses

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- Intermediaries remuneration and verify whether these statements:
- reconcile with the accounting records and supporting documentation.
- have been approved by the Compliance Committee where applicable.

(v) Verify that all Management Declarations from Senior Managers in Technical Safety Consultants of operation have been received and test the follow- up systems employed for ensuring that all matters of concern or reports have been addressed or acted upon by the Compliance Officer or, where applicable, his/her nominated delegate(s).

(vi) Any other areas and assurance review procedures as considered appropriate by us and agreed with Technical Safety Consultants.

We based our review primarily on management and other information provided to us by the company’s management and staff. We also interviewed personnel responsible for the Compliance Programme, including the Compliance Officer, Managers and other appropriate employees.

There are no generally accepted international standards for these other Assurance Engagements. In the absence of such standards, we based our approach on best practices as well as on the underlying principles of the standards of the International Federation of Accountants but adapted as necessary. We, therefore, planned and performed our procedures to obtain a reasonable basis for our conclusions. However, we have not performed an audit. Accordingly, we do not express such an opinion.

3. Results of our assurance review

During our review the following aspects were noted for follow-up action:

.....

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Based on our review procedures, with the exception of the above mentioned findings (where applicable) nothing has come to our attention to cause us to believe that:

- (i) the Compliance Programme does not meet the requirements of the TIC Council Compliance Code





- (ii) the Compliance Programme has not been adequately enforced and implemented
- (iii) the systems for collection, analysis and aggregation of Compliance Programme violations are not functioning as designed and that
- (iv) the consolidated management statements for intermediary remuneration, political contributions, charitable contributions and sponsorships, and extraordinary expenditures relating to gifts, hospitality and expenses do not properly reflect the figures as reported by the affiliates or reporting units.

4. Recommendations

From our work, we have provided the following recommendations to management which have been agreed:

Name of External Audit:

.....

Date.....Firm.....

