



ETHICS POLICY AND ETHICAL BUSINESS CONDUCT

SUMMARY

The Ethics Policy and Ethical Business Conduct (the “Policy”) sets the standards of ethical business conduct which shall apply to all our subsidiary companies, associated companies and joint venture companies under the Dscuff Group of Companies (hereinafter referred to as “Dscuff” or the “Group”), including all employees¹ and vendors, including sub-contractors.

Dscuff shall conduct its business in an ethical and proper manner, in accordance with the Group’s values and code of conduct, and in full compliance with local and international laws where we conduct business. In the course of conducting business, integrity must underlie all company relationships with customers, suppliers or other parties who have an interest.

Dscuff’s employees shall not directly or indirectly engage in conduct or activity that may raise questions as to the Group’s honesty, impartiality or reputation or otherwise cause embarrassment to the Group.

All employees are encouraged to ask questions and seek guidance, report suspected violations and express concerns regarding compliance with this Policy.

REQUIREMENTS

1. Leadership

We aim to become a world class leader in every aspect of our business, in developing our team leadership skills at every level, in our management performance, in the way we design, build, support our products, projects execution and in our financial results.

2. Integrity

We shall always take the high road by practicing the highest ethical standards, and by honouring our commitments. We will take personal responsibility for our actions, and treat everyone fairly and with trust and respect

3. Quality

We shall strive for continuous quality improvement in all that we do, so that we can hold our heads up high and work with the world’s premier firms.

4. Customer satisfaction

Satisfied customers are essential to our success. We will achieve total customer satisfaction by understanding what the customer requires and delivering it to them.

¹ **Employee(s)** means all employees and individuals working for subsidiary companies, associated companies and/or joint venture companies under the Group whether full time, part-time, contract, temporary and including individuals engaged by the Group as consultant and/or marketing agent.



5. Working together

We recognise our strength and our competitive advantage is and always will be people. We shall continue to learn, and share ideas and knowledge and encourage cooperative efforts at every level of our business.

6. A Diverse team

We value skills, strengths and perspectives of a diverse team. We shall foster a participatory workplace that enables people to be involved in making decisions about their work.

7. Good Corporate Citizenship

We shall provide a safe workplace and protect the environment along with the health and wellbeing of our staff and their families. We shall encourage our employees to volunteer their time and talent by supporting worthy causes in the community

In order for us to fulfil all of the above requirements we expect all Employees to observe the Company's Code of Conduct and the proper marketing practices as outlined herewith:

CODE OF CONDUCT

The code of conduct outlines expected behaviour for all our employees. Dscuff shall conduct its business fairly, impartially, and in an ethical and proper manner as well as in full compliance with all applicable laws and regulations, and consistent with the Group's values.

In conducting its business, integrity must underlie all Company's relationships, including those with customers, suppliers, communities, and among employees. The highest standards of ethical business conduct are required of all employees in the performance of their responsibilities for the Company.

Employees shall not engage in conduct or activity that may raise questions as to the Company's honesty, impartiality, reputation, or otherwise cause embarrassment to the Company.

Employees shall ensure that they: -

- do not engage in activity that might create conflict of interest for them or Dscuff;
- do not take advantage of their position to seek personal gain through the inappropriate use of the Group's information;
- do not submit fictitious claims (all claims to clients shall be according to actual work done);
- observe fair dealing in all transactions and interactions;
- comply with the Group's Anti-Bribery and Anti-Corruption Policy;
- promptly report any illegal or unethical conduct to the Management Board;
- protect Dscuff, Dscuff's customers, and suppliers' assets and use them only for appropriate approved activities; and
- without exception, comply with all applicable laws, rules and regulations.



PROPER MARKETING PRACTICES

Improper and unethical marketing practices or activities could harm the Group's reputation. It is therefore essential that no prohibited activities regardless of the justification are carried out.

Such prohibited activities include the following: -

- Using deceptive or misleading statements
- Attempting to induce individuals to place their personal interests above those of their companies or organisations they represent. This includes improper entertainment, greasing, or any form of facilitating payments.
- Obtaining unauthorised access to classified or proprietary information or documents
- Securing an unfair competitive advantage
- Violating any law or regulation
- Engaging in activity that could damage the companied reputation

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