



Established 1979

Celebrating 30 Years in the Survey Industry

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Construction Projects Division: Engineering Surveying, Monitoring
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PROFESSIONAL CONDUCT AND INTEGRITY POLICY

What the Company does for its employees:

The Company values the fact that our employees, contractors and clients come from a wide variety of backgrounds and have a wealth of different abilities and perspectives. As a company, we seek to treat all our people with respect and fairness, allowing each individual to reach their full potential, and provide a positive and supportive work environment.

The Company will work to ensure that its employees are recruited, developed and retained on the basis of their skills, knowledge and experience. It is the Company's policy not to discriminate against its workers on the basis of their gender, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, colour, national origin, disability or age, pregnancy or trade union membership or the fact that they are a part time worker or a fixed term employee. The Company will not tolerate employees unlawfully discriminating on the aforementioned grounds.

This policy applies to the advertising of jobs and recruitment and selection to training and development, opportunities for promotion, to conditions of service, benefits and facilities and pay, to health and safety and to conduct at work, to grievance and disciplinary procedures and to termination of employment including redundancy.

The Company also aims to ensure that we provide a working environment where everyone can give their best. Harassment, bullying, victimisation, discrimination or any other behaviour or less favourable treatment which creates an intimidating, hostile, offensive or disturbing environment cannot be tolerated.

Failure to comply with this policy will lead to disciplinary action being taken may result in dismissal. Embarrassing, excluding or isolating an individual; offensive jokes; displaying pictures of a sexual nature; repeated, unwelcome social invitations or unacceptable behaviour at a Company social function may all constitute breaches of the Company policy on professional conduct and integrity. If you believe that you may have been disadvantaged or harassed on any of the aforementioned unlawful grounds, you are encouraged to raise the matter through the Company's grievance procedure.

What the Company expects from its employees:-

Corporate Code of Ethics

The Company requires that all employees be guided by and observe basic concepts of honesty and fair dealing in carrying out the duties and responsibilities of your employment. The Company's standards are intended to exceed bare legal requirements, and you are expected to act in accordance with the highest standards of business ethics. You are also expected to be aware of all laws and regulations which apply to the businesses and activities of the Company in which you are involved and are responsible to see that your actions comply strictly with the requirements of those laws and regulations. Prohibited activities are outside of the scope of employment. The following, while not intended to be all-inclusive, describes a number of areas where employees are most likely to encounter circumstances that might result in violations of the foregoing principles:-

(1) Competition Law

The company and all other companies are subject to a number of complex laws generally designed to ensure competition in free markets. Most prominent among these are laws prohibiting agreements among competitors to fix prices or terms and conditions of sale. All employees should avoid any discussion of prices (or matters which determine prices) or terms and conditions with competitors' representatives.

Those employees who have a significant role in pricing or establishment of terms and conditions should avoid social and business contacts with competitors under circumstances which might, intentionally or otherwise, involve exchanges of information relating to prices or terms of sale. Participation in artificial or complimentary bids, customer or supplier blacklists, bidding pools and unwarranted disparagement of competitors' products and services are unlawful in most jurisdictions and contrary to Company policy.

Violation of competition law can result in severe civil and criminal penalties for both the company and the individuals involved. Public policy and the Company policy do not permit indemnification of employees involved in intentional violations of competition law. In any case where doubt exists as to whether a given arrangement or transaction violates the foregoing policy, advice and prior clearance by the Company Secretary is required.

(2) Conflicts of Interest

Employees are expected to make judgements and decisions in the course of their employment based on objective standards. Judgements and decisions influenced by personal considerations or by the receipt or prospect of personal gain are totally inconsistent with that principle. Employees are to report promptly to their Director any transaction or prospective transaction, directly or indirectly involving the company in which they or any relative or business associate has a financial or other interest.

Acceptance of kickbacks or bribes in any form for any purpose is prohibited and any offer of such is to be reported immediately to the Company Secretary. Lavish entertainment, expense paid trips, expensive gifts and the like are considered to be a form of kickback, are illegal, and are not to be accepted. Normal and reasonable business entertainment and gifts of no significant value are acceptable. In general, employees should accept only those things for which they would receive expense reimbursement from the company if furnished by them under similar circumstances

(3) Inside Information

Inside information with respect to the Company is information about the Company (or any organisation with which it has or might have a relationship), its business or its plans, not generally known to the public. Such information will include information regarding clients, operations and know-how and all documents and records relating to the same. Use of inside information for personal gain or benefit is prohibited by law and by company policy.

This prohibition applies equally to information acquired in the normal course of an employee's duties and to information acquired otherwise from within or outside of the Company. Employees are not to disclose confidential, technical, personal or inside information about the Company, its employees or others having a relationship with the Company, except as specifically required by law or the proper discharge of their duties and responsibilities to the Company. In any case where a doubt exists, employees should seek guidance from the Company Secretary.

(4) Environmental, Health and Safety

It is the policy of the Company to conduct its activities in a manner that is consistent both with the law and its own Environment and Health and Safety policies such that reasonable safeguards are provided for the environment and for the health and safety of its employees. Compliance with environmental and health and safety laws, regulations, industry standards and company policies is a duty of all employees wherever the company is operating.