

ROCHEM'S INTEGRATED POLICY STATEMENT

Rochem Petroleum Testing Services is a Private Shareholding Company, established as per the Egyptian Investment Law no. 8 for the year 1997 (Commercial Register Number 771). The company is a leader in independent petroleum inspection, specialized in Quantity and Quality control on crude oil and its derivative services.

It is the policy of Rochem Inspectors to provide exclusive services that meet or exceed the requirements of our customers, our contracts and industry standards. We seek to engage efficiently, responsibly and profitably in the petroleum inspection and testing services industry through a high standard of performance and aims to maintain a long-term position in the market through a set of conducts accepted and followed by each personnel in the company. Those principles are adopted from IFIA/TIC COUNCIL 2018 Compliance Code, along with the ISO international standards ISO 9001: 2015, ISO 14001:2015, ISO 45001:2018, ISO/IEC 17020:2012 and ISO/IEC 17025:2017.

We strive to surpass our customers' expectations by careful attention to quality details and by developing our processes through continual improvement. The quality of our services and their conformance with both the specified and expected requirements of customers is the concern of every person in our organization. In consistency with the implementation of this policy, the company establishes, operates and maintains a reliable integrated management system associated with its integrated objectives in accordance with the requirements of the previously mentioned ISO standards and compliance code, in addition to our code of ethics.

1- As for Quality Management System (ISO 9001) along with the other ISO standards:

In general, Rochem alongside with its top management is fully committed to:

- Ensure that the company policy and objectives are communicated and understood at all levels within Rochem.
- Provide the framework for setting, documenting, implementing and maintaining Rochem's integrated objectives.
- Continually review its integrated management system to ensure that it remains relevant, appropriate and up-to-date with Rochem activities and services.
- Continually review and assess all external and internal factors that are relevant to its strategic direction and might affect its ability to achieve the intended results of its integrated management system.
- Fulfill its compliance obligations and comply with all legal requirements and other international regulatory requirements that relate to the previously mentioned international management systems requirements. Those regulations are available to the public and all interested parties.
- Ensure that all Rochem personnel are taught, trained and familiarized with Rochem integrated management system, its documented information, its compliance obligations and their own individual responsibilities; and implement its policy and procedures at all times.
- Continually improve its integrated management system and business performance.

2- As for Inspection / Testing Laboratory Management Systems (ISO 17020 / ISO 17025):

Rochem alongside with its top management is fully committed to:

- Provide an excellent, professional and independent petroleum inspection / testing services as our inspectors / laboratory analysts is focused to meet the needs of our customers, statutory and regulatory requirements, as well as the requirements of ISO/IEC 17025; with the aim to improve the effectiveness of the management system and to maintain good and ethical professional practice.
- Assure the accuracy and precision of laboratory results in order to be reliable, interpretable, repeatable and defensible.
- Ensure that all lab personnel are well trained and competent enough to run the lab tests offered within the scope of our services.

3- As for Occupational Health and Safety / Environmental Management Systems (HSE) (ISO 45001 / ISO 14001)

Occupational Health and Safety / Environmental Management System (HSE) responsibilities are also an essential component of Rochem's business strategy. As a result, Rochem alongside with its top management is fully committed to:

- Protect the environment and the overall well-being of its stakeholders, its employees, clients, contractors and communities through observance and encouragement of this policy.
- Prevent injury and ill health by provision of safety and healthy working conditions.
- Prevent pollutions and reduce waste, emissions and discharges by using energy efficiently.
- Eliminate the OHS hazards/environmental aspects and reduce their risks/impacts to protect its workers, visitors, contractors as well as vicinity facilities and their working personnel. This is performed through consultation and participation of all workers.

- Provide the mechanisms, time, training and resources for consultation and participation of workers. This includes removing any obstacles or barriers such as language, literacy or fear of reprisals.

4- Code of Conduct and Core Values (IFIA / TIC Council's 2018 Compliance Code):

Rochem has dedicated itself to maintain a compliance programme, which is adopted from IFIA / TIC Council's 2018 Compliance Code, that ensures all technical and business conducts are carried out in a professional, independent, and impartial manner, avoiding any conflict of interest and guaranteeing business confidentiality, anti-bribery, fair marketing, health & safety and fair labor.

4.1. Rochem's commitment towards:

A) Customers:

To win and maintain customers by providing services which offer value in terms of price, quality, safety and environmental impact, and which are supported by the requisite technological, environmental and commercial expertise.

B) Employees (ie. Fair Labor)

To respect the human rights of its employees, to provide its employees with good and safe conditions of work, and competitive terms and conditions of service, to promote the development and best use of human talent and equal opportunity employment in the planning and direction of their work, and in the application of these principles within Rochem. It is recognized that commercial success depends on the full commitment of all employees.

Moreover, Management applies restrict arrangements to ensure that the inspection / laboratory personnel are free from any undue internal and external pressure. Therefore, the inspectors / laboratory personnel pursues an effective communication system between the inspection / laboratory management and the staff giving sufficient attention to internal complaints or concerns from employees aiming at avoiding any internal undue pressure.

C) Business Suppliers

To seek mutually beneficial relationships with suppliers as well as promote the application of these principles. The ability to promote these principles effectively will be an important factor in the decision to enter into or remain in such relationships.

D) Society

To conduct business as responsible corporate members of society, to observe the laws of the countries we operate in, to express support for fundamental human rights in line with the legitimate role of business and to give proper regard to health, safety and the environment consistent with our commitment to contribute to sustainable development.

4.2. Impartiality, Business Integrity and Conflicts of Interests

Rochem insists on honesty, integrity, and impartiality in all aspects of their business and expect the same in their relationships with all those with whom they do business.

In the case of business partners (if any), Rochem mandates that all signed contracts with other parties must confirm the latter's compliance with Rochem's Compliance Programme.

Rochem shall carry out its services honestly and shall not tolerate any deviation from its approved methods, procedures and policies. Where approved test methods make provision for tolerances in results, Rochem shall ensure that such tolerances are not abused to alter the actual test findings. Rochem shall report data, test results, and reports 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.

Employees must not be involved in any activities that would diminish confidence in the lab and inspection competence, impartiality, judgment or operational integrity. Employees shall not use public office for private gain, and must act impartially without giving preferential treatment to any private organization or individual.

Rochem avoids any conflict of interest with any related entity in which it has a financial or commercial interest and to which it is required to provide services. Employees must avoid conflicts of interest between their private financial activities and their part in the conduct of company business.

Employees are prohibited from the following activities:

- A) To directly or through relatives, friends or intermediaries, acquire an interest in a supplier, a client or a competitor of Rochem.
- B) Hold any position with a competitor or client.
- C) Conduct any company business with any member of their family or with an individual or organization with which they or their family is associated.
- D) Employ a member of their family without approval of Rochem's management.

4.3. Anti-Bribery

Rochem shall maintain accurate books and records which properly and fairly document all financial and business transactions in accordance with established procedures and is subject to audit.

The direct or indirect offer, payment, soliciting and acceptance of bribes in any form are unacceptable practices. This includes kickbacks on any portion of a contract payment. Rochem prohibits 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 any government officials.

A) Business Principles for Countering Bribery

Rochem employs good business practices and risk management strategies in accordance with the Business Principles for Countering Bribery as published by Transparency International and Social Accountability International (see www.transparency.org). These should address at least the following areas:

B) Political and Charitable Contributions / Sponsorships

Rochem acts in a socially responsible manner within the laws of the countries in which we operate. Rochem, all employees or agents do not make direct or indirect payments to political parties, organizations or their representatives or take any part in party politics, as a way of obtaining advantage in business transactions. All charitable contributions and sponsorships are not used as a subterfuge for bribery.

Rochem will account all its political and charitable contributions in a separate ledger and consolidate all such payments made by any of the operations that form part of the company.

C) 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.

Under Rochem policy, facilitation payments are considered a form of bribery. The compliance committee works on identifying and eliminating those payments through means of control.

D) Gifts, hospitality and expenses

Rochem prohibits the offer or receipt of gifts, hospitality or expenses whenever such arrangements could affect the outcome of business transactions and are not reasonable and bona fide expenditures.

4.4. Fair Marketing

Rochem 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.

4.5. Confidentiality

Openness and transparency are essential values in Rochem Inspectors. However, there is a duty of discretion that must be followed by all Rochem personnel because some information must be protected to safeguard the rights of our clients, partners or staff or our own business interests.

This includes any information which is not available to the general public and which there is an interest to keep confidential, such as: Information relating to the business which includes details of clients, inspection results, information provided by third parties under obligations of confidentiality, and financial/corporate data pertaining to Rochem activities.

This confidential information must not be disclosed to others and may not be used for personal benefit. To ensure the confidentiality policy is effectively implemented, understood and communicated, all Rochem employees must sign a Non-disclosure Agreement which prohibits the disclosure of any confidential business information obtained during the course of his/her employment, to other parties.

When confidential information relating to the business of Rochem must be disclosed in the course of business, all measures must be taken to protect its confidentiality. Confidential information relating to others may only be disclosed with the approval of the person or entity involved.

In the case of intermediaries, agents, subcontractors, contractors and suppliers, Rochem ensures they are made aware of the confidential nature of business information that they may handle through business dealings, and that they should not disclose confidential information to other parties

4.6. Competition

Rochem supports free enterprise. The company seeks to compete fairly and ethically and within the framework of applicable competition laws; they will not prevent others from competing freely with them.

4.7. Drugs, alcohol and Firearms

The use, possession, transportation, promotion, or sale of illegal drugs or drug paraphernalia, and /or otherwise legal but illicitly used substances by anyone while on Rochem premises is absolutely prohibited. The use, possession, or transportation of alcoholic beverages, firearms, live ammunition, explosives, or weapons is also prohibited.

Rochem's personnel who are found in violation of these prohibitions will not be allowed on premises or work sites and may be referred to law enforcement agencies for their action.

* All the above principles are the cornerstone of Rochem's culture and address issues such as accountability, training, communication, resources, performance measurement and sustainable development as we strive to be good citizens in every community in which we operate.

Manager Director,

Taysir Bahig