

Anti-Corruption Code of Conduct Statement

Site Operative Solutions Ltd.(SOS) is committed to combating all forms of corruption on a national basis. Corruption is prohibited by international conventions and national laws. Statutory bans apply not only to dealings between companies but also contacts with politicians and public officials. Infringements are punishable by fines or penalties and may cause significant and lasting harm to the assets and reputation of SOS.

Corruption is the abuse of the power or trust given to a person by the public or by private persons through that person's willingness to make the exercising of this power and authority contingent on benefits from third parties. A public official must not, in the performance of his duties, demand or accept any consideration in the form of a benefit for himself or a third party. A representative of a company must not, in the context of a business relationship, demand or accept consideration in the form of a benefit either for himself or a third party in return for an unfair preference when purchasing goods or services. Both the granting and the accepting of benefits in order to influence decision-making processes are prohibited and prosecutable offences.

Granting and accepting benefits

When dealing with business partners and competitors as well as government/public bodies, employees may only accept or grant benefits if the acceptance or granting of such benefits in no way creates an impression of influencing the decision-making process, intended or otherwise. Business partners are, for example, customers, suppliers and service providers as well as third parties with whom SOS intends to establish business relations. Competitors are companies which compete or may compete with SOS in certain markets. Benefits are, for example, gifts, hospitality, invitations to events, the payment of travelling costs and services that go beyond what is market standard; it is irrelevant whether they are granted directly or indirectly (e.g. to an immediate family member or closely related associations, organisations or companies).

The following principles must be observed when accepting and granting benefits in dealings with business partners and competitors as well as government/public bodies. The details for implementation in everyday business life are regulated in the "Guidelines on Benefits" document.

If in doubt, the employee should seek the approval of his supervisor or the Managing Director prior to accepting or granting a benefit. Even if a benefit is in line with this Code of Conduct, there may nevertheless be tax implications for both SOS and the employee. Any questions or doubts with reference to benefits both received and granted must be clarified in advance with the relevant tax department.

Under no circumstances is it permissible for an employee to ask for a benefit.

Employees are not allowed to grant or accept monetary gifts or non-standard discounts.

Employees may only grant and accept non-monetary gifts, hospitality, invitations and other benefits as long as they do not have an unreasonably high value, do not go beyond usual business practice and are proportionate to the donor's or recipient's normal standard of living. If in doubt, the employee should seek the approval of the Managing Director prior to accepting or granting a benefit.

Particularly stringent rules apply when granting benefits to public officials. Public officials are, for example, ministry officials, secretaries of state, ministers, mayors, civil servant of financial authorities and municipal administration staff. Senior managers (e.g. managing directors) of companies that are majority-owned by the state or private persons who perform public administration tasks can also be regarded as public officials. In respect of any benefits be granted to public officials which go beyond token gifts of minimum value the employee should seek the approval of the relevant compliance officer prior to granting the benefit; advice should also be sought when there is doubt as to whether a person should be classed as a public official.

Signed:  _____

Managing Director