



Global Surveys
STEP TO CONFIDENCE

GLOBAL SURVEYS GROUP COMPLIANCE PROGRAMME 2024-2025



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OUR MISSION

To provide best services to our clients and market with full commitments to professionalism, independence and neutrality



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OUR PRINCIPLES

- **Fair Labor**
- **Anti-corruption**
- **Anti-bribery**
- **Political Participation**
- **Charitable Contributions**
- **Conflict Of Interest**
- **Fair Business Conduct**
- **Prevention Of Sexual Exploitation And Abuse**
- **Business Partners Code Of Conduct**
- **Independence & Impartiality**
- **Health & Safety**
- **Confidentiality And Information Security**



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FAIR LABOR

Global Surveys Group prohibits discrimination in all aspects of employment, including recruitment, hiring, promotion, compensation, benefits, training, and termination, based on race, color, ethnicity, nationality, religion, gender, age, disability, sexual orientation, or any other protected characteristic.

- All employees shall have equal access to opportunities for employment, career advancement, training, and development, based on their skills, qualifications, and performance, without discrimination or favoritism.
- Global Surveys Group is committed to creating a workplace that is free from discrimination and harassment of any kind. We recognize the importance of treating all employees with dignity and respect.
- Global Surveys Group is committed to providing fair and competitive compensation to all employees, in compliance with applicable laws and industry standards.
- Compensation packages are determined based on factors such as job responsibilities, qualifications, experience, and market rates.
- At Global Surveys Group, we believe that work-life balance is essential to the well-being and productivity of our employees. We recognize that our business operations can impact our employees' personal lives and as such, Attendance and overtime policies were developed taking into consideration both work-life balance and maintaining the smooth operation.
- We maintain a healthy work environment conducive to high performance through ways of collegiate and collaborative working and a positive and inclusive work culture.
- We foster a work environment that is safe from threat and intimidation, be it physical or emotional. We do not tolerate demeaning or insulting attitudes or actions, explicit or implicit, towards another individual. We will take appropriate action against anyone inflicting awkward and uncomfortable working relationships, or any action that undermines performance levels, results and the welfare of others.
- Global Surveys Group prohibits the use of child labor and forced labor in any form, including slavery, human trafficking, debt bondage, or involuntary servitude.
- Suppliers and contractors shall be required to adhere to the same standards, and measures shall be implemented to ensure compliance throughout the supply chain.

Chief Executive Officer
Kamal Kayal



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ANTI CORRUPTION

At Global Surveys Group, We are committed to combating corruption in all its forms and maintaining a zero-tolerance policy towards bribery, extortion, and other corrupt practices. Our policy reflects a firm stance against corruption and unethical behavior in all aspects of our operations. Employees are empowered to reject unethical requests and escalate concerns.

- We adhere to all laws, regulations, and related standards that pertain to preventing bribery and corruption in every country where we operate. Upholding these principles is crucial to maintaining our personal integrity.
- Employees should conduct themselves with honesty, fairness, and professionalism in all interactions with interested parties.
- We maintain a zero-tolerance policy against bribery and corruption, ensuring our integrity remains intact. Corruption generally involves illegal, dishonest, or fraudulent actions to gain unethical advantages, either for the business or for personal benefit. It includes giving or accepting bribes, which may involve any gift, payment, or benefit intended to encourage improper performance of duties. A bribe does not need to be given; merely requesting or offering one is enough to constitute corruption.
- Global Surveys Group recognizes that addressing corruption not only mitigates legal and reputational risks but also enhances shareholder and stakeholder value.
- Employees are empowered to refuse any requests or instructions from interested parties that violate ethical standards or legal requirements.
- Employees should provide interested parties with clear and accurate information regarding being transparent and honest in all communication with products, services, pricing, and terms of engagement.
- Employees are accountable for their actions and decisions in interested parties' engagements and should be prepared to justify and document their conduct as necessary.

Chief Executive Officer
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ANTI BRIBERY

Our policy unequivocally prohibits bribery, facilitation payments, and political contributions by employees or on behalf of Global Surveys Group . We adhere strictly to anti-bribery laws and regulations, refraining from any form of bribery or political support. Employees are required to decline gifts and report any solicitation or offering of improper payments for provision of improper benefit.

- Bribes and facilitation payments in any form, including offering, promising, paying, requesting, agreeing to, or accepting them, are strictly prohibited within Global Surveys Group.
- All employees are required to comply with the anti-bribery laws and regulations of the countries and jurisdictions in which we operate.
- Employees and representatives of the company are prohibited from accepting gifts, favors, or any form of gratuities, employees and representatives should politely decline offers of gifts. If refusal is not feasible or may damage a business relationship, the gift should be returned to the sender with an explanation.
- Breaches of this policy will result in disciplinary action, including dismissal in cases where staff members are found to have paid or received bribes. Similar action will be taken against third parties performing services for Global Surveys Group who fail to comply with this policy or equivalent anti-corruption standards, including termination of their relationship with Global Surveys Group.
- Employees shall report any solicitation or offering of an improper payment or advantage coming to their knowledge.
- Deliberate failure to report suspicions of corruption or to conceal bribes by others will result in disciplinary action.
- Third parties who have offered or accepted bribes, or who are suspected of doing so, should not be engaged to work for Global Surveys Group .
- Any malicious, willful, or deliberate misreporting of a bribe or suspicion of a bribe may be treated as a disciplinary matter within Global Surveys Group .

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POLITICAL PARTICIPATION

Global Surveys Group adheres to its core values and constitution, refraining from making political donations sponsorships, or any form of support to political individuals, political parties, or any other political organizations.

- Any such contribution made by staff members on behalf of Global Surveys Group will be considered a violation of this policy.
- Company resources, including funds, assets, facilities, and personnel, shall not be used for political contributions or activities.
- Any employee who engages in political activities or makes personal contributions must ensure that they do not create the impression that they are acting on behalf of the company. Additionally, employees are encouraged to disclose their political activities to avoid potential conflicts of interest.

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CHARITABLE CONTRIBUTIONS

Our charitable contributions are exclusively with registered non-profit organizations, ensuring all activities are philanthropic and compliant with applicable laws. Contributions are not for promotional purposes or exchanged for services. We formally verify each charity's status and maintain full transparency, recording and publicly disclosing all donations as required by law.

- The charity recipient is registered as a charity or non-profit organization. We will not engage with unregistered charities.
- All charitable activities and contributions are philanthropic in nature and not set up for the primary purpose of generating a commercial return for Group companies or otherwise for the benefit of individual employees
- The charity recipient is permitted to receive such charitable contributions under all applicable laws and regulations in the relevant country or region.
- The primary purpose of any charitable activity or contribution is not to promote our Group and/or a relevant Maison, nor is the contribution in exchange for any service
- Prior to any charitable engagement, we will formally communicate with the nominated charity (via letter or other written means) to confirm the nature of the engagement and/or purpose of the donation. There will then be a verification of the recipient's status as a charitable organization.
- The donation will be open and fully transparent. There will be no use of intermediaries. All charitable contributions will be recorded and, where required by applicable laws and regulations, placed on the public record either by the recipient or by us

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CONFLICT OF INTERESTS

We recognize and mitigate conflicts of interest to ensure fair and unbiased decision-making, transparency, and accountability.

Types of conflict of interests including but not limited to:

- Financial Conflicts of Interest
 - Personal Relationships
 - Professional Opportunities
 - Secondary Employment
 - Gifts and Benefits
 - Outside Activities
 - Investments and Holdings
 - Political Affiliations
- Employees should refrain from taking on roles or responsibilities that could create conflicting loyalties.
 - Employees should respect the confidentiality of sensitive information related to the organization's operations, clients, or stakeholders. Breaching confidentiality could create conflicts of interest or undermine trust.
 - Employees should be cautious about accepting gifts, favors, or other forms of gratuities from clients, suppliers, or other parties. Such gestures could compromise objectivity and create conflicts of interest
 - Any actual, potential, or perceived conflicts of interest must be disclosed to the compliance department as soon as they are identified. Employees are responsible for recognizing and reporting any conflicts of interest, including new or changed interests, which may impact their duties at Global Surveys Group. Failure to disclose an interest, providing incomplete or inaccurate disclosures, may result in disciplinary action. All declarations will be treated with utmost confidentiality and reviewed by the compliance department to assess potential conflicts and take necessary measures to manage or mitigate them.
 - All employees of Global Surveys Group are required to declare and confirm non-engagement in other employment or external business activities upon joining and must promptly report any changes in their employment status or engagements. Upon joining, employees must complete and sign a declaration of interests' form detailing any personal or financial interests that could potentially influence their work. Candidates for appointments must also disclose any significant relationships or financial interests related to Global Surveys Group board members, employees, clients, suppliers, or stakeholders. Employees involved in inspection activities must undertake an annual declaration of interests to ensure ongoing transparency and accountability.
 - Upon identifying a conflict of interest, measures shall be taken to ensure that the integrity and impartiality of Global Surveys Group are maintained, including imposing additional oversight or restrictions, withdrawing the individual from specific discussions or decisions, reassigning tasks or duties, or requiring the individual to relinquish their involvement in the operation or project.

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INDEPENDENCE & IMPARTIALITY

Global Surveys Group places the utmost importance on integrity and impartiality in the conformity assessment processes, ensuring that any risks to impartiality are eliminated or mitigated. The management of impartiality ensures that Global Surveys Group do not allow commercial, financial, personal, or other pressures to compromise impartiality:

- All departments are committed to creating a culture of impartiality as one of the most important values that Global Surveys Group is committed to.
- Although prior or current relationships are not necessarily an impartiality risk, possible conflicts of interests should be declared by personnel regarding personal relationships, prior relationships, financial interest and all other situations which may reasonably be considered as a possible conflict of interest.
- Impartiality and conflicts of interest are covered through training and binding contractual agreements, together with oversight and controls implemented, to ensure that all conformity assessment activities are conducted in an independent and impartial manner.
- No trader, broker, insurance company, or any other entity that utilizes the services of Global Surveys Group of Companies shall own or hold a controlling share in the Group.
- A comprehensive supplier code of conduct shall be developed that outlines our All-conformity assessment - inspection services managers as technical managers indicated by ISO17020, and all other conformity assessment services managers are responsible for identifying and register impartiality risks on an ongoing basis, during all routine conformity assessment processes, in accordance with the risk management procedure.
- Conformity assessment services managers are responsible for assessing the risks of neutrality when these risks are identified according to the risk management procedure, and the assessment is reviewed when emergency changes occur and at least once a year.
- Conformity assessment service managers are responsible for defining the safeguards for impartiality risks and the necessary controls for each impartiality risk and are responsible for managing any changes required to avoid and reduce impartiality risks.
- Human Resources Department is responsible for identifying and registering personal impartiality risks through the screening process for new employees and contracted personnel, and through periodic updating of personal information for all employees.

Chief Executive Officer
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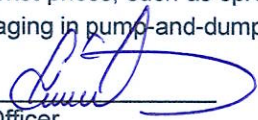
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FAIR BUSINESS CONDUCT

Global Surveys Group is in full compliance with all applicable fair-trade laws of the countries and regions in which it operates, and conducts business with partners that are in compliance with such laws. We conduct business fairly and sincerely, with the highest ethical principles, to ensure a high level of trust among the group and its various stakeholders.

- Global Surveys Group prohibits any practice that has, or could have the effect of restricting, distorting, or preventing competition. We operate in total autonomy with respect to competitors, preventing any agreed practices or exchanges of confidential information.
- Employees and representatives are prohibited from engaging in collusion, which involves conspiring with competitors to artificially manipulate market conditions, prices, or competition.
- This includes sharing sensitive business information, coordinating pricing strategies, allocating customers or territories, or any other anti-competitive practices aimed at restricting competition or gaining unfair advantage.
- Employees and representatives must respect the confidentiality of sensitive information belonging to competitors and other stakeholders. Unauthorized disclosure or misuse of confidential information is prohibited and may result in disciplinary action.
- Price-fixing, which involves agreements among competitors to set prices at a certain level, is strictly prohibited.
- Employees and representatives must refrain from discussions, agreements, or understandings with competitors regarding pricing, discounts, terms of sale, or other elements that may impact market prices.
- Employees and representatives must not engage in bid-rigging activities, such as agreeing in advance on bid prices, bid rotation schemes, or submitting intentionally noncompetitive bids to ensure a predetermined outcome.
- Employees and representatives must refrain from engaging in any activities that may manipulate market prices, such as spreading false information, creating artificial trading activity, or engaging in pump-and-dump schemes.


Chief Executive Officer
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BUSINESS PARTNERS CODE OF CONDUCT

At Global Surveys Group , we recognize that our business partners especially our supply chain has a significant impact on our business practices and sustainability. To ensure that our suppliers share our commitment to ethical and sustainable business practices, the following measures shall be applied:

- Prior to engaging in any contracting process, all potential contractors and business partners must undergo rigorous prequalification screening to assess their integrity, past conduct, and adherence to ethical standards.
- A comprehensive code of conduct shall be developed that outlines our expectations for ethical and sustainable business practices, including human rights, labor standards, environmental impact, and anti-corruption measures.
- The Code of Conduct informs business partners of the following:
 - that they may not engage in corrupt practices
 - that they must disclose information on any situation that may appear to present a conflict of interest
 - that Global Surveys Group has a zero-tolerance policy with regards to the acceptance of gifts or hospitality from external parties.
 - Post-employment restrictions may apply to Global Surveys Group staff in service and former Global Surveys Group staff members who participated in the procurement process if such persons had prior professional dealings with suppliers.
- Code of conduct shall be communicated to all our business partners and require them to sign and adhere to the code as a condition of doing business with Global Surveys Group .
- Standards of conduct for other third parties related to Global Surveys Group are set forth in their respective agreements/contracts, all agreements with implementing third parties should contain appropriate anti-fraud and corruption clauses and clauses stating that they are subject to regular monitoring activities, verifications and external (including forensic) audits and sanctions in the case of proven allegations of fraud.
- Global Surveys Group might provide training and resources to our business partners to help them understand and implement the code of conduct, including training on human rights, labor standards, environmental impact, and anti-corruption measures.
- Global Surveys Group might conduct regular audits of our business partners to assess their compliance with the code of conduct and identify areas for improvement. We will work with our suppliers to address any issues identified in the audits and provide support to help them improve their practices

Chief Executive Officer ,
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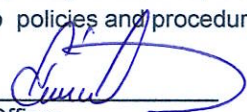


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PREVENTION OF SEXUAL EXPLOITATION AND ABUSE

Global Surveys Group has a zero tolerance for sexual exploitation and abuse. Global Surveys Group will not tolerate its staff, associates, partners or any other representatives associated with the delivery of its work to engage in any form of sexual exploitation or abuse.

- Vulnerable adults, women and children are particularly at risk of sexual exploitation and abuse. Global Surveys Group is committed to protecting all communities that the company always works with from sexual exploitation and abuse,
- Sexual exploitation and sexual abuse violate universally recognized international legal norms and standards and have always been unacceptable behavior and prohibited conduct for Global Surveys Group staff.
- To further protect the most vulnerable populations, especially women and children, the following specific standards, are promulgated:
 - (a) Sexual exploitation and sexual abuse constitute acts of serious misconduct and are therefore grounds for disciplinary measures, including summary dismissal.
 - (b) Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defense.
 - (c) Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading, or exploitative behavior, is prohibited. This includes any exchange of assistance that is due to beneficiaries of assistance.
 - (e) Where a Global Surveys Group staff member develops concerns or suspicions regarding sexual exploitation or sexual abuse, he or she must report such concerns via established reporting mechanisms please refer to D.54 – Compliance incident Handling Procedure.
 - (f) Global Surveys Group staff are obliged to create and maintain an environment that prevents sexual exploitation and sexual abuse. Managers at all levels have a particular responsibility to support and develop systems that maintain this environment.
- The standards set out above are not intended to be an exhaustive list. Other types of sexually exploitive or sexually abusive behavior may be grounds for administrative action or disciplinary measures, including summary dismissal, pursuant to Global Surveys Group policies and procedures.



Chief Executive Officer
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HEALTH AND SAFETY

Global Surveys Group is committed to providing a safe and healthy workplace for all employees, contractors, and visitors, while also minimizing our impact on the environment.

Our commitment to HSE is an integral part of our business and we strive to continuously improve our HSE performance. We are committed to:

- Providing a safe and healthy workplace and preventing work-related injuries and illnesses.
- Protecting the environment by minimizing our impact on air, water, and land resources
- Complying with all applicable legal and regulatory requirements related to HSE.
- Continuously improving our HSE performance by setting and reviewing HSE objectives and targets.
- Providing appropriate HSE training and resources to our employees and contractors
- Communicating openly and transparently with all stakeholders on matters related to HSE.

To achieve these commitments, we will

- Establish and maintain an HSE Procedures that promotes continuous improvement in HSE performance
- Identify and assess HSE hazards and risks associated with our activities and services, and implement controls to eliminate or minimize these risks
- Encourage our employees and contractors to take an active role in promoting and maintaining a safe and healthy workplace and protecting the environment.
- Monitor and measure our HSE performance and report regularly on progress and areas for improvement.
- Provide the necessary resources to support the effective implementation of our HSE policy and management system. We recognize that individual responsibility is a key factor in achieving our HSE objectives, and we encourage everyone to take an active role in promoting safety, health, and environmental responsibility

Chief Executive Officer
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CONFIDENTIALITY & INFORMATION SECURITY

We are obligated to protect and uphold the confidentiality, integrity, and availability of all sensitive information, client's information, and other confidential data related to the company and its business operations. Confidential information includes any data or knowledge that, if disclosed outside the Group, could harm the interests of any Group company.

- Where in doubt, we will consider any information that we handle as confidential and therefore requiring secure handling, information security controls are applied within Global Surveys according to our information security management system
- Any unauthorized disclosure, loss or corruption of such information must be declared as a security incident according to our information Security incident handling procedure.
- Any willful unauthorized disclosure of company confidential information, either internally or externally, will be treated as a disciplinary offence and will be addressed following HR procedures.
- Access to confidential information relating to the company or its business operations will only be provided to those individuals who require it for the exercise of their duties.
- All data that are created, stored, transferred, or received through the information system or other communication systems owned by the group, including various applications, e-mail, Internet, fax, etc., and in any form (electronic or paper), is considered the ownership of Global Surveys Group, the security measures required by the company must be applied.
- All Global Surveys Group employees must sign Non-Disclosure agreement which prohibits the disclosure of any confidential business information, obtained during the course of his/her employment, to other parties even after the end of the employment relationship.
- All intermediaries, joint venture partners, agents, subcontractors, franchisees, contractors, and suppliers must be made aware of the confidential nature of any business information they handle in their dealings with us. They are also obligated not to disclose this confidential information to other parties, even after the end of the contractual relationship.

Chief Executive Officer
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