

Policy:	Corporate Compliance	Reference:	CCSES0082
		Review Date:	10/2022

What is Corporate Compliance?

'Simply put, corporate compliance means having internal policies and procedures designed to prevent and detect violations of applicable law, regulations rules and ethical standards by employees, agents and others. It involves legal risk management and internal controls."

- SES Engineering (Newark) Ltd Corporate Compliance Program and Policies and Procedures Manual apply to SES Engineering (Newark) Ltd and all its affiliates. The word SES Engineering (Newark) Ltd when used in this Manual includes all affiliates.
- > The policies and procedures apply to all employees of SES Engineering (Newark) Ltd and all its affiliates. The word "personnel" when used in this Manual includes all SES Engineering (Newark) Ltd (and affiliates) employees, unless the context clearly means otherwise.
- > Whether or not specifically stated in these procedures the Compliance Officer and all other designated officials may delegate responsibilities to any appropriate person.
- > Whether or not specifically stated in these procedures, any disciplinary action may include, in addition to any other appropriate recourse: against an employee, suspension and/or termination of employment; against a vendor, termination of contract(s) and/or barring from future contracts.
- Nothing in the policies and procedures shall (i) constitute a contract of or agreement for employment or (ii) modify or alter in any manner any employee's at-will employment status.
- > Any part of the policies and procedures may be changed or amended at any time without notice.

What does this mean to you as an SES Engineering (Newark) Ltd Employee?

As SES Engineering (Newark) Ltd personnel, you are responsible for carrying out your job responsibilities in a professional, conscientious, and ethical manner, and in accordance with all applicable laws, regulations, rules, and policies. You are also responsible for reporting to management any actions or behaviours you believe, in good faith, violate ethical practices, law, or regulation. You may report such actions without fear of reprisal or retaliation. However, if you fail to report these violations, you may be subject to disciplinary procedures. You must cooperate in the investigation of any unethical action or illegal activity. You are responsible for seeking supervisory advice if you have doubts or are unclear about what the right action is to stay compliant. You may also request advice from the Compliance Officer.

SES Engineering (Newark) Ltd promotes professional excellence and encourages open and honest communication among all personnel. As such, you shall:

- > Be truthful and avoid misrepresentation.
- Ensure fairness and objectivity in all activities.
- Respect and protect the right of privacy of all people, including colleagues & clients.
- Promote public confidence in SES Engineering (Newark) Ltd.
- > Strive to meet performance standards at the highest possible level.
- Refuse to engage in or tolerate any fraud, misuse, abuse, or waste of SES Engineering (Newark) Ltd resources and report such violations to management.
- Encourage growth and self-improvement in yourself and your colleagues.
- > Exhibit respect for colleagues, clients, and any other contacts.
- > Treat vendors, suppliers with objectivity and fairness, avoiding even the appearance of favouritism.

Scope

SES Engineering (Newark) Ltd subscribes to the following code of conduct which is expected to be adhered to by all employees and affiliates.



Purpose.

SES Engineering (Newark) Ltd and affiliates Code of Ethical and Legal Behaviour (Code of Conduct) guides us in all that we do. It does not replace any of the more specific policies, procedures, or practices of the agency. Rather, it is intended to support our mission to provide the highest quality services to all we serve and to promote a culture of honesty and integrity. Maintaining integrity and high ethical and legal standards requires hard work, courage, and difficult choices. Each employee must accept responsibility for compliance with this code. Commitment to these standards should never be compromised for personal, financial, professional, or other business purposes. Each and every employee, intern, volunteer and appointee is expected to carry out their daily tasks in a legal and ethical manner that can withstand the scrutiny of others, including outside regulatory agencies. All employees are expected to abide by the rules, regulations, and policies that govern their job. There are core standards and values that must be upheld for every employee in all interactions with the individuals we serve, vendors, and colleagues. In addition, there are job-based functions that require strict adherence to specific laws, rules, and regulations based on the task performed. Please note that in addition to carrying out their work duties in a compliant and ethical manner, employees are also expected to bring forth any suspected compliance issues to their supervisor or to the SES Engineering (Newark) Ltd Compliance Officer or utilise the complaint mechanism.

Standards

- > Disclose Potential Conflicts of Interest Conflict of interest occurs in situations where a person has the potential to direct or influence a decision to his/her own gain.
- Adhere to all Policies and Procedures SES Engineering (Newark) Ltd policies and procedures were developed to ensure quality, fairness, and safety for all employees.
- ➤ Maintain Accurate Documentation and Reporting Procedures and Practices, both operational and financial Data integrity and accuracy, as well as retention, are critical for support of regulatory compliance. SES Engineering (Newark) Ltd and affiliates will only bill for services and accept revenues for which it is entitled.
- > Safeguard SES Engineering (Newark) Ltd companies Assets. Resources are to be used for job-related purposes and not for personal gain.
- Comply with all applicable Laws, regulations, codes, and policies.

This policy reflects SES Engineering (Newark) Ltd commitment to operating in accordance not only with the strict requirements of the law, but also in a manner that is consistent with high ethical and professional standards. The policy applies to the full range of SES Engineering (Newark) Ltd activities. All personnel have a personal obligation to assist in making the policy successful. Personnel are expected to:

- (1) familiarize themselves with these policies and procedures.
- (2) review and understand the key policies governing their particular job functions.
- (3) attend required compliance training.
- (4) identify and disclose any potential conflicts of interest.
- (5) report any fraud, waste, abuse, or other improper activity through the mechanisms.
- (6) carry out their jobs in a manner that demonstrates a commitment to honesty, integrity, and compliance with internal policies and procedures and the law. Personnel are required to familiarize themselves with the policies and procedures, and to adhere to their terms. Of course, no set of policies and procedures is able or intended to cover every situation that may occur, and personnel are expected to perform their duties in good faith and in a manner that they reasonably believe to be in the best interests of SES Engineering (Newark) Ltd and its clients.

Questions about the existence, interpretation, or application of any law, regulation, policy, or standard should be directed, without hesitation, to a supervisor, the Compliance Officer, or a company director. The policies are regularly reassessed and is constantly evolving to address new compliance challenges and maximize the use of SES Engineering (Newark) Ltd resources. Personnel are encouraged to provide input on how they might be expanded or improved.