




TECHNOMETER MIDDLE EAST WORK MEASUREMENT AND SPACE L.L.C.

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0. Revision Sheet

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1. Foreword

TECHNOMETER MIDDLE EAST WORK MEASUREMENT AND SPACE L.L.C. (herein after “TCM” and/or Company) is committed to ensuring the Company operates ethically and with integrity and its leadership has designed TCM’s Anti-Corruption Compliance Program to ensure compliance with the general anti-corruption practices and other applicable anti-corruption laws. TCM’s Anti-Corruption Compliance Program consists of three primary components: (1) preventing corruption; (2) detecting corruption; and (3) responding to allegations of corruption.

2. Responsibilities

The Board of Directors oversees the Company’s compliance system and controls, including its Anti-Corruption Compliance program.

3. The Program

3.1 Third-Party Intermediaries

Any intermediary that may have dealings with non-government officials or state-owned or controlled companies on TCM’s behalf, such as sales agents, consultants, sponsors, customs brokers and freight forwarders, lobbyists, regulatory license and permit providers, and certain other third parties, must be subject to rigorous risk-based due diligence before the business relationship can commence, focused on detecting and mitigating corruption risks associated with the use of intermediaries, including verifying the business rationale for engaging the intermediary and the reasonableness of the proposed compensation.

TCM conducts extensive searches on all legal entities and individuals in the chain of ownership. High-risk agents and intermediaries are subject to enhanced due diligence. The intermediary will not be approved unless TCM has determined that the proposed relationship complies with all applicable law, and that the review conducted has provided the Company with a reasonable level of assurance that its dealings with the proposed intermediary will not violate the applicable anti-corruption law. TCM may include specific anti-corruption compliance provisions in all intermediary agreements, including the right to conduct audits and terminate the

agreement for compliance breaches. The due diligence is refreshed every time the third-party agreement comes up for renewal.

3.2 Joint Ventures and Partnerships

Any individual or entity with a financial or beneficial interest in a project-specific or permanent Joint Venture or other equity investment with TCM, as well as partners in consortia, teaming and joint bidding agreements, or strategic alliances that will engage in any activities, are subject to mandatory risk-based anti-corruption due diligence. TCM applies the same rigorous standards of review to both majority- and minority-controlled JVs. High-risk partnership arrangements are subject to enhanced due diligence and, depending on circumstances, may include external legal counsel review. Any identified due diligence concerns for such high risk partnerships are addressed in a memorandum that may contain recommendations for conditions of approval. TCM standard anti-corruption provisions for joint-venture agreements prohibit foreign and domestic bribery and facilitation payments and incorporate audit and termination rights. Prior to the formation of the JV, the parties must agree on the corporate governance procedures that include the adoption of anti-corruption policies and establish a system of appropriate internal controls. Both JVs and non-JV partnership arrangements require compliance with TCM's Code of Business Conduct. JV board members and key personnel receive periodic anti-corruption training and TCM internal audit conducts regular audits of certain JVs selected through a careful risk-based analysis.

3.3 Supplier Due Diligence

The procurement team oversees the selection and onboarding of suppliers and subcontractors. The onboarding process involves, among other things, screening new suppliers and subcontractors on their compliance with ethical practices through our pre-qualification questionnaire. The suppliers and subcontractors are required to comply with TCM's Code of Conduct. As a primary contact point with a supplier during the onboarding stage, procurement plays a key role in collecting anti-corruption due diligence information from vendors and suppliers that interact with non-government officials on TCM's behalf and are subject to mandatory anti-corruption review and approval for third-party intermediaries. If a third-party intermediary vendor or supplier uses a sub-agent or additional party to perform part of the

proposed services, the sub-agent or additional party must undergo the same due diligence as the vendor or supplier. Alternatively, the Company CEO, after determining that the supplier's due diligence procedures are satisfactory, will seek a certification from the candidate supplier or subcontractor that it has conducted a due diligence review of the sub-entity and has found no unresolved due diligence concerns.

3.4 Business Courtesies

Our procedures allow normal and customary business meals and entertainment or the giving of business mementos of nominal value provided that such activities are reasonable in the circumstances in which they are given and do not violate any applicable laws. To ensure strict compliance with the applicable local laws and regulations, payments for all Business Courtesies must be limited by whichever framework is most restrictive. Business Courtesies that do not meet these criteria may be provided but must be pre-approved in accordance with the established procedure. Each business unit, project or office that provides business courtesies is responsible for maintaining a business courtesy register.

3.5 Charitable and Community Contributions

The Company may establish standards, guidelines and documentation requirements for charitable contributions. TCM will only consider making contributions to an organization, a program or an activity that is either a school or educational institution; or a Vetted Foreign Charitable Organization, school or educational institution. To prevent against the risk that a charitable or community contribution could be deemed to be an improper payment, contributions to organizations must be reviewed and approved by the Board of Directors, which considers a number of factors to ensure the proposed contribution will pose no risk of liability under applicable anti-corruption laws.

3.6 Anti-Corruption Training

All TCM members of the Board of Directors must take the annual ethics training, which includes an anti-corruption compliance module. TCM also requires that the Board of Directors,

appropriate employees of the Company, high-risk intermediaries and partners receive periodic training.

3.7 Risk Assessment

TCM's Anti-Corruption Program is risk-based and tailored to the Company based on an assessment of the corruption and bribery risks it faces. The Company periodically conducts a risk assessment to measure the effectiveness of the program and ensure the program is attuned to its current risk.

In addition, corruption risk is assessed for each new project, permanent joint venture or office as part of an overall process of reviewing all risks associated with such projects, joint ventures or offices.

3.8 Hiring of Government Officials or Their Relatives

All applicants complete a questionnaire identifying whether the candidate is a current or former government employee or whether he/she has any close family relative who is a current government official. If the candidate is selected, any positive responses are forwarded to the Board of Directors for further review and vetting. In addition, the Company conducts background checks for employees being hired as or promoted to positions of substantial authority. During this process, the same information is gathered and reviewed for conflicts of interest and anti-corruption concerns.

The Company does not employ any currently serving politicians or engage any currently serving politicians on a contractual basis.

3.9 Political Contributions and Lobbyists

TCM complies with all applicable laws regulating political influence and campaign contributions. No contribution of the Company funds, property or services can be made in support of any political candidate for elective office or any political party or party official (either at the state or federal level) without the appropriate review and approval.