



Code of Ethics Policy

Policy Objective

This Policy defines the structure of the South Seas Inspection Code of Ethics policy, and associated obligations of management and employees.

Principles

South Seas Inspection is committed to conducting our business lawfully and ethically. It is critically important that all employees meet the highest standards of legal and ethical conduct.

Applicability

This Policy applies to all employees and contractors in all aspects of their association with South Seas Inspection.

Considerations

Respect for the Individual

Treat each other with respect and honesty regardless of role or individual differences. Discuss issues and solicit suggestions from people who may be affected by decisions or procedures being made or implemented. As the saying goes, "Do unto others that which you would have done to you".

Relationships with Clients, Suppliers, Contractors and Consultants

Employees are required to deal with clients in a professional and business like manner, remembering always that how they deal with clients, suppliers, contractors and consultants can have an important bearing on the company's future.

Contract Negotiations

In negotiating contracts, we must be accurate and complete in all representations made on behalf of the Company. The submission to any client of a proposal, quotation or other documents, or document that is deliberately false, incomplete or misleading can result in a civil and/or criminal liability for the employee, for the managers who condoned such practice and for the company. We adhere to these practices not just because the law requires them, but because they reflect the fair manner in which we deal with clients, suppliers, contractors and consultants.

There are specific areas within the Company Quality System that specify the way proposals, quotations and other documents are prepared, and the levels of authority required to make various representations to clients on behalf of the Company. Managers and employees are responsible for making themselves aware of these methods and authorities.



Charging of Costs / Timesheet Reporting

Employees and contractors who submit timesheets must do so in a complete, accurate and timely manner. The timesheet must accurately reflect the number of hours worked on the specified project or account. The manager's approval is a representation that the timesheet has been reviewed with respect to the validity and accuracy of the hours as reported and allocated.

Managers and employees have a continual responsibility to ensure that clients are only charged for the services, materials and expenses are applicable under the scope of work as specified in the contract. Any discrepancies or changes to any terms must be discussed with the client prior to any charges being invoiced.

Contractors/Consultants

Engagement of contractors and consultants must receive prior approval under applicable Company policy. Contractors and consultants are required to abide by the standards of this Code of Business Ethics.

Bribery and Corruption

The offering and receiving of bribes by employees in the course of business is prohibited; this extends to the giving and receiving of lavish entertainment or gifts. This is considered to be Gross Misconduct and consequently leads to immediate dismissal.

It is recognized however, that in certain overseas environments it can be difficult to operate without making small payments. Such payments should be in line with local custom and practice, and should be authorized by a Director of the Company.

When outside Singapore and in a situation where the Code would not ordinarily permit the making of such payments, but to refuse to do so would be considered awkward or insulting, the payment may be made, if lawful, and the immediate manager must be informed.

Conflict of Interest

Employees are required to make prompt disclosure to their immediate manager of any situation that may involve conflict of interest. Additionally, the involvement of family members with Company competitors, clients or suppliers may, under certain circumstances, result in a conflict of interest. If in any doubt as to whether a situation involves a perceived or present conflict of interest, the employee or their immediate manager should escalate the query.

An employee may not have any employment, consulting or other business relationship with, or accept any remuneration from, a competitor, client or supplier of the Company unless written approval by a Director of the Company is provided, in advance.

Outside employment may also constitute a conflict of interest if it places an employee in the position of appearing to be representing the Company in that employment, or it involves providing goods and



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services substantially similar to those the Company provides or is considering making available.

A conflict would also exist if the outside employment lessens the efficiency, alertness or productivity normally expected of employees on their jobs.

Employees are prohibited from using the Company time, equipment and other resources, or those of any client, in pursuing outside business activities.

Proprietary and Confidential Information

South Seas Inspection Proprietary and Confidential Information Employees must not disclose any Company proprietary or confidential information to any outside party, except as specifically authorized by management pursuant to established policies and procedures, This includes non-public business, financial, personnel or technological information, plans or data that learned, generated or acquired during employment with the Company. Upon termination of employment, employees may not copy or retain documents containing proprietary or confidential information.

Proprietary Information of Others

Employees shall not solicit, receive or use any proprietary or confidential information belonging or relating to any customer, supplier, competitor, consultant or other person or entity, except as may be lawfully received from the owner or a third party. Information that is published or otherwise in the public domain or is independently developed is not considered proprietary.

Notification Process

In situations where an employee becomes aware of a breach of any component of this code by a colleague, they should alert management via the Human Resources Manager.

The focus on open communication as part of the company culture will discourage anonymous notification.

Once a report is made, then appropriate disciplinary processes will be followed as outlined in the Disciplinary Policy, where the Managing Director will be the final arbiter in any review of a disciplinary or grievance issue.

Best Regards,

George Slorach
Managing Director

Date: July 2003