
POLICIES JOURNAL

TABLE OF CONTENTS

1. HEALTH, SAFETY AND ENVIRONMENT POLICY	3
2. HOUSEKEEPING POLICY	4
3. WORK WEAR PERSONAL PROTECTIVE EQUIPMENT (PPE) POLICY	5
4. DRUG AND ALCOHOL POLICY	8
5. INCIDENT INVESTIGATION POLICY	9
6. ANTI-BRIBERY & CORRUPTION (ABC) POLICY	13
APPENDIX 1	17
7. DRIVING POLICY	18

HEALTH, SAFETY AND ENVIRONMENT POLICY

Primary concern of North Side is the personnel safety and health of each employee. With strong HSE measures North Side believes that all accidents are preventable. The prevention of occupationally induced injuries and illness has priority over all operating productivity. North Side management is fully committed in achieving its policy objective and shall provide all necessary resources required to insure adequate safeguard and high HSE measures at workplace.

Adherence to our policies is a top priority, not only for managers and supervisors, but also for each employee. Each employee must understand that he is the manager of his own safety and the safety of his co-workers.

Awareness of personal safety, mandatory safety training and risk assessment are key elements in achieving zero accidents. North Side line manager shall keep consistent efforts to formulate and review work procedures in order to achieve our objectives.

North Side fully appreciates and recognizes the responsibility and obligation to protect and preserve the environment. All employees will be strictly directed to ensure damage to the environment is reduced to the minimum and shall restore fully if caused by unavoidable circumstances.

In order to achieve our objective, our HSE program shall include, but not limited to the following:

- Monitoring and control through HSE inspections and audit to recognize and eliminate any unsafe work conditions;
- Provision of all required safeguard to the maximum extent possible and practical. Fully following stringent code of manufacturer's recommendations with no deviation or short cuts.
- Imparting training to all employees and strictly adhering to the statutory regulations.

Dmitry Shubenok
Country Manager

A handwritten signature in blue ink, appearing to read 'Dmitry Shubenok'.

HOUSEKEEPING POLICY

North Side requires all employees that:

- Keep work areas and storage facilities clean, neat and orderly.
- Keep all aisles, stairways, passageways, always exits and access ways to buildings free from obstructions. Remove all grease and water spills from traffic areas immediately.
- It is everyone's responsibility to pick up and clean up.
- Do not place supplies on top of lockers, hampers, boxes, or other moveable containers at a height where they are not visible from the floor.
- When piling materials for storage, make sure the base is firm and level. Cross tie each layer.
- Keep piles level and do not stack piles too high. Keep aisles clear and maintain adequate space to work in them.
- When storing materials suspended from racks or hooks, secure them from falling and route walkways a safe distance from the surface beneath.
- Tools, equipment, machinery and work areas are to be maintained in a clean and safe manner.
- Defects and unsafe conditions must be reported to your supervisor.
- Return tools and equipment to their proper place when not in use.
- Clean up spills immediately to avoid hazards. In the event the removal cannot be done immediately, the area must be appropriately guarded, signed or roped off.
- Nail points, ends of loop or tie wires, etc., must not be left exposed when packing and unpacking boxes, crates, barrels, etc. Nails are to be removed as soon as lumber is disassembled.
- Store sharp or pointed articles to keep co-workers from coming in contact with the sharp edges or points.
- Dispose of all packing materials properly to reduce the chance of fires.
- Empty wastebaskets daily into approved containers.
- Maintain adequate lighting in obscure areas for the protection of both employees and the public. Keep landscaping well-manicured to minimize hiding places.
- Employees are not to handle food, tobacco, etc., with residue from any lead-based product (such as leaded gasoline) on their hands. Consumption of food and beverages is prohibited in areas where hazardous substances are stored or used.
- When fuses blow continually it is an indication of an overload or short. Report this condition to your supervisor immediately.
- Keep electrical equipment properly maintained and free of grease and dirt.
- Maintain fire inspection and other fire prevention measures.
- Observe all safety warning signs, including locks and tags on equipment.

Dmitry Shubenok
Country Manager



WORK WEAR PERSONAL PROTECTIVE EQUIPMENT POLICY

1. Policy Statement

North Side LLC acknowledges the need for the provision of personnel protective equipment for the health, safety and well-being of its employees. PPE is defined as most necessary part of work environment which is intended to be worn or held by a person at work and which protects him against one or more risks to his health, safety or welfare. Work-place hazards must be eliminated when possible. However, if hazard controls are necessary then departments must select and use engineering controls when such controls are available and feasible. All work must be evaluated to identify hazards and any necessary personal protective equipment (PPE). When personal protective equipment is needed to perform a job task in a safe manner, the evaluation and selection of personal protective equipment must be documented. Personal protective equipment must be used and maintained in accordance with this program and the equipment manufacturer's recommendations. Departments must ensure that personal protective equipment (PPE) properly fits the user.

2. Employers/Line Mangers responsibilities

North Side LLC will provide Work Wear Personal Protective Equipment (PPE) to staff when the risk presented by a work activity cannot be adequately controlled by other means. All reasonable steps will be taken to secure the health and safety of employees who work with PPE by consultation with staff and their representatives to:

- Carry out a risk assessment of duties to be undertaken whilst wearing the proposed PPE to
- determine whether the PPE is suitable, sufficient and necessary.
- Take any necessary measure to remedy any risks found as a result of the risk assessment.
- Ensure that where two (or more) items of PPE are used simultaneously, are compatible and as effective used together as separately.
- Arrange for adequate accommodation for correct storage of the PPE.
- Implement steps for the maintenance, cleaning and repair of PPE.
- Train staff in the safe use of PPE for all risks within the organization.
- Replace PPE, which has been provided to meet a statutory obligation, as necessary and at no cost to the employee.
- Inform every employee of the risks, which exist and can be eliminated by wearing appropriate PPE.
- Reassess as necessary if any substances used or work processes change.

Procedures of Dealing with Health and Safety Issues relating to PPE the North Side LLC will:

- Take all necessary steps to investigate the circumstances.

- Take corrective measures where appropriate.
- Advise the employee of action taken.

3. Employees Responsibility

Where a problem arises in the use of PPE the employee must:

- Inform their Line Manager immediately.
- In the case of an adverse health condition, advise the line manager and request referral to the Occupational Health Advisor and contact his/her own General Practitioner.

4. Information and Training

The North Side LLC will give sufficient information, instruction and training to ensure the health and safety of workers using PPE, which includes temporary staff, persons gaining work experience with the company and contractors, as well as those in direct employment.

Managers and supervisors who are responsible for use of PPE will also receive appropriate training.

Training must include of the following subjects:

- When the PPE is necessary;
- What PPE is necessary;
- How to properly put on and take off the PPE;
- The limitations of the PPE; and
- The proper care, maintenance, useful life and disposal of the PPE.

5. Record Keeping

Records will be kept by the line manager of the employee using the PPE of the following:

- The results of the PPE risk assessment.
- Actions taken as a result of PPE risk assessment.
- Inventory of PPE equipment and to whom each item has been supplied.
- The provision of training.
- Information given to employees.
- Complaints or alleged reports of discomfort or non-suitability of the PPE discovered following field tests or surveys.
- Action taken in respect of such complaints.
- Replacement of PPE (with dates).
- Maintenance and testing of PPE equipment.

6. Safe System of Work

The use of PPE is an important means of controlling risks involved in various work activities. To ensure that it is effective, it is necessary to follow the manufacturers and North Side instructions on its correct use. Safe systems of work should be devised and incorporated into the risk assessment as control measures. The wearer of the PPE should be made aware of the risk assessment and should adhere to the recommended safe system of work where applicable.

The following PPE, related to the scope of work of North Side LLC is constantly required to be used at working place:

1. Coverall for body protection;
2. Safety shoes for foot protection;
3. Goggles for eyes protection;
4. Helmet for head protection;
5. Gloves for hand and arm protection;

Dmitry Shubenok
Country Manager

A handwritten signature in blue ink, appearing to read 'Dmitry Shubenok'.

DRUG AND ALCOHOL POLICY

North Side will strictly abide by all the rules of Sultanate of Oman in relation to handling, holding & consuming of alcohol or any other intoxicating substances.

North Side strictly prohibits the use, making, sale, purchase, transfer, distribution, consumption, or possession of drugs or alcohol on company property. To this end, the Company reserves the right to conduct searches for drugs or alcohol, including, but not limited to, searches of lockers, filing cabinets, desks, packages, etc. which are on Company property or in a Company facility.

Any drugs or alcohol found as a result of such a search will be confiscated and the occupant or user of the object searched will be subject to disciplinary action, up to and including termination of employment.

In situations where an employee is taking prescribed drugs or medication as treatment for a health condition, the employee shall be responsible for informing their Supervisor of any potentially impairing side effects.

Employee must report any violation of drugs and alcohol on or off North Side premises while conducting company business.

Dmitry Shubenok
Country Manager

A handwritten signature in blue ink, appearing to read 'Dmitry Shubenok'.

INCIDENT INVESTIGATION POLICY

North Side company aims to maintain a safe and healthy environment by correcting situations that caused or could likely cause injury. To ensure a safe workplace for all employees, contractors and clients or when an incident occurs, it is important to report the occurrence so actions such as an effective and systematic investigation and reporting mechanisms can be taken to make sure that a similar or more serious incident does not happen again and further risks of workplace incidents are eliminated.

Procedure:

1.1 What is an incident?

'Incident' for the purposes of this procedure includes:

- a) Any event that results in injury or disease no matter how minor;
- b) Any dangerous occurrence - this term includes near misses - any event that endangers the health or safety of a person;
- c) Any event that results in death.

1.2 Incident Systematic Management.

Incident investigation and analysis can be seen as a systematic pro-active approach to the continuous improvement of the Occupational Health and Safety (OHS) Management System. Constructive investigations yield essential information, which will assist in:

- a) Determining injury rate;
- b) Identifying trends and problem areas;
- c) Permitting comparisons to be made, for example, between injury rates for different areas of the workplace, across different time frames and involving different types of injury;
- d) Complying with legal requirements, for example, providing data required for personal injury claims involving workers compensation payments;
- e) Identifying the basis causes that contributed directly, or indirectly, to each incident;
- f) Identifying deficiencies in the OHS Management System that permitted the incident to occur;
- g) Suggesting specific corrective action alternatives for the management system;

1.3 Reporting Process.

- a) Employee witnesses or is involved in an incident – the employee must complete Incident Reporting and Investigation Form and Injury Register (if injured) and report to management within 24 hours.
- b) The responsible manager will report injury to insurer and enforcing authority (if applicable) within the statutory reporting timeframes.
- c) Management in consultation with employees will ensure immediate interim action is taken as required to minimize risk within the workplace.
- d) Manager will investigate incident and review concerns raised. The level of investigation will be determined at this stage.

- e) The responsible manager will carry out necessary interviews and review documentation (within the investigation team – if full investigation is warranted).
- f) The responsible manager will complete the final section of the Incident Reporting and Investigation Form.
- g) The responsible manager will complete the necessary risk management documentation i.e. risk register and action plan.
- h) Corrective actions will be implemented according to the risk action plan.
- i) All documentation must be kept on file for easy access and retrieval, if required.
- j) All incidents will be reviewed by management and health and safety representatives on a regular basis.

1.4 Determining the Root Cause

All incidents, including near misses, must be reported within 24 hours of the occurrence an investigation undertaken by management. The purpose is to determine the true and accurate circumstances, which led up to and contributed to the event and to prevent the event occurring again.

Accurate, clear and complete information is needed from the investigation process. Details which should be recorded and included in the incident investigation report are:

- a) A description of the sequence of events leading to the incident
- b) Correct identification of all causal factors
- c) A description of all causal factors
- d) The corrective actions already taken
- e) Further recommendations for corrective actions; and
- f) Review and sign-off by senior management

1.5 Investigation of Incidents

Accurate, clear and complete information is needed from the investigation process.

For the incident investigation to be successful in identifying all of the causes of the incident, it will be necessary to establish:

- k) The events and circumstances leading up to the incident such as the types of events and circumstances leading up to the incident; the system of work currently in place; the instructions given for the work; variations from instructions or safe work systems; workplace conditions such as lighting, floor surfaces, stair treads and handrails, warning signs, and temperature and weather, if the incident occurred outside; the exact location of the incident; the materials in use or being handled; and the type of equipment in use.
- l) Facts of the incident – facts relevant to the incident may include the state of the work system and the actions which occurred at the moment of the incident; the people directly involved, and those involved at a distance, if any; the tools, equipment, materials and fixtures directly involved; the time the incident occurred.
- m) Facts of events immediately after the incident – relevant facts from events which occurred immediately after the incident may include the injuries or damage resulting directly from the incident; the events leading to consequential injury or damage; the people involved, including

those rendering aid; and any problems in dealing with the injuries.

2. Investigation Team

Investigation team consists for minor incidents consist of the Managing Director, Technical Director, HSE Adviser.

In the event of an incident, which is reported to the enforcing authority regarding a major incident, the investigation team may involve specialist consultants and the enforcing authority representatives.

2.1 Reporting to Statutory Authorities.

The company will comply with all the statutory reporting requirements. These arrangements oblige North Side to report the details of certain incidents to the relevant enforcing authority. The types of incidents, which must be reported, are usually:

- a) Incidents resulting in loss of life which must be reported immediately.
- b) Incidents resulting in a worker taking a number of days off work due to injury.
- c) Incidents involving damage or potential damage to dangerous items.

3. Review of Corrective Actions.

The responsible Managing Director will review the information gained from the incident investigation and carry out a risk management process.

After the investigation has been conducted, the Incident Investigation and Reporting form will be completed detailing the action needed to be carried out to eliminate or minimize the hazard using the risk management processes.

4. Risk Identification, Assessment and Control.

4.1. Identifying and assessing all hazards that have caused incidents using the following risk management methods:

- a) Defining the scope of the activity that is to be assessed.
- b) Identifying the risks.
- c) Assessing the risks.
- d) Controlling the risks.
- e) Monitoring and reviewing the process.

4.2 Implementing all controls using the following hierarchy of hazard control

- a) Eliminating the hazard.
- b) Substituting the hazard.
- c) Modifying the process.
- d) Isolating the hazard.
- e) Implementing engineering controls.
- f) Using a combination of controls.
- g) Using back up controls, such as personal protective equipment.

4.3 In addition, «Company» the organization shall:

- a) See that all corrective actions identified in an investigation are authorized with signed documentation.
- b) Allocate responsibility against each corrective action, to ensure everyone is aware of what is required of them. Any lack of response shall be tracked to the responsible person.
- c) Ensure any corrective actions have a time frame allocated to them for completion.
- d) Ensure all employees concerned have received sufficient training, or arrange for retraining, as deemed necessary by the findings of the investigation.
- e) Where a specific task or process has caused the incident, a job safety and environmental analysis will be undertaken in order to re-assess the risks associated within the area.
- f) After implementing corrective actions, ensure they are evaluated at a future time. This is to ensure that the controls have not caused any further hazards, and that they are in fact appropriate to reducing the likelihood of a recurrence of the same event.

5. Use of Incident Statistics

The company will use the information gained from incident statistics to measure trends over a period of time so that the company has an indication of whether it is improving, stable or deteriorating with regards to Health and Safety performance.

5.2 Negative Performance Indicators

The company will measure “Average Lost Time Rate” and the average time lost per occurrence of injury or disease. This rate is an indication of the severity of occurrences being experienced by employees over a period of time.

5.3 Positive Performance Indicators

Positive Performance Indicators are pro-active and show the effectiveness of training, management commitment and support, and resources given to safety, which are all part of the larger picture.

Statistics will also provide the company status with an indication of the effectiveness of the corrective or preventative actions taken to minimize or eliminate the hazard which caused the accident.

6. Privacy Considerations

The Privacy Act provides the legislative basis for protection of individuals' rights in regard to disclosure of personal information. Personal information may only be divulged in circumstances which correspond with the stated use.

Dmitry Shubenok
Country Manager



ANTI-BRIBERY & CORRUPTION (ABC) POLICY

1. Policy Statement

1.1 It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to Bribery and Corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

1.2 We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. We remain bound by local and national laws.

2. Definitions

Agent: Any individual acting as an agent, paid by the company, acting on the company's behalf in negotiating with Third Parties.

Bribery / Corruption: Bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favour, or a financial or other advantage from another to influence a business outcome improperly, to induce or reward improper conduct or to gain any commercial, contractual, regulatory or personal advantage. It can be direct or indirect through Third Parties.

Company: All subsidiaries and affiliated companies.

Conflict of Interest: Occurs when an individual or organization is involved in multiple interests, one of which could possibly corrupt, or be perceived to corrupt, the motivation for an act in another.

Donation: A Donation is a voluntary contribution in the form of monetary or non-monetary gifts to a fund or cause for which no return service or payment is expected or made. Contributions to industry associations or fees for memberships in organizations that serve business interests are not necessarily considered Donations.

Employee: For the purposes of this policy this includes all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or joint ventures or their employees, wherever they are located.

Facilitation Payments: A form of Bribery in which small payments are made with the purpose of expediting or facilitating the performance by a Public Official of a routine governmental action and not to obtain or retain business or any other undue advantage. Facilitation payments are typically demanded by low level and low-income Public Officials in exchange for providing services to which one is legally entitled without such payments.

Gifts, Invitations & Hospitality: Invitations given or received to social functions, sporting events, meals and entertainment, gifts or customary tokens of appreciation.

Intermediary: Includes but is not limited to Agents, distributors, consultants, sales representatives, implementation partners, sales partners.

Kickback: A bribe to obtain an undue advantage, where a portion of the undue advantage is 'kicked backed' to the person who gave, or is supposed to give, the undue advantage.

Public Official: Officials or employees of any government or other public body, agency or legal entity, at any level, including officers or employees of state-owned enterprises and officers or employees of enterprises which are mandated by a public body or a state-owned enterprise to administrate public functions.

Sponsorship: Sponsorship is about partnering with external organizations to deliver mutual benefits through an exchange of monies, products, services, content or other intellectual property.

Third Party: Any individual or organization you come into contact with during the course of your work for us. This includes actual and potential customers, suppliers, business contacts, Intermediaries, government and public bodies, including their advisors, representatives and officials, politicians and political parties.

3. Scope

3.1 This policy applies to all Employees and relevant Third Parties of the Company and shall be communicated to them at the outset of our business relationship and as appropriate thereafter.

3.2 This policy applies in all countries or territories where the Company operates. Where local customs, standards, laws or other local policies apply that are stricter than the provision of this policy, the stricter rules must be complied with. However, if this policy stipulates stricter rules than local customs, standards, laws or other local policies, the stricter provisions of this policy shall apply.

4. Gifts, Invitations & Hospitality

4.1 This policy does not prohibit normal and appropriate hospitality (given and received) to or from Third Parties.

4.2 You are prohibited from accepting a gift or giving a gift to a third party in the following situations:

- it is made with the intention of influencing a Third Party to obtain or retain business, to gain a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it is given in your name and not in the name of the Company;
- it includes cash or a cash equivalent (such as gift certificates or vouchers);
- it is of an inappropriate type and value and given at an inappropriate time (e.g. during a tender process); and
- it is given secretly and not openly.

4.3 We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another.

The test to be applied is whether in all the circumstances the gift or hospitality is reasonable, justifiable and is proportionate. The intention behind the gift should always be considered.

5. Facilitation Payments & Kickbacks

5.1 In many jurisdictions, making Facilitation Payments is illegal. We do not make, and will not accept, Facilitation Payments or Kickbacks of any kind anywhere in the world.

5.2 Where the facilitation payment is being extorted or you are being coerced to pay it and your safety or liberty is under threat or you feel you have no alternative but to pay for personal or family peace of mind, then pay the Facilitation Payment and report this to your line manager as soon as possible.

6. Your Responsibilities

6.1 It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a Public Official or Third Party to 'facilitate' or expedite a routine procedure;
- accept payment from a Third Party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a Third Party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- threaten or retaliate against another Employee who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy or perceived breach of this policy.

6.2 It is your responsibility to ensure that all accounts, invoices, memoranda and other documents and records relating to dealings with Third Parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept 'off-book'.

6.3 You must declare and keep a written record of all Gifts, Invitations & Hospitality according to Company practice accepted or offered, which will be subject to managerial review.

6.4 You must ensure all expense claims relating to Gifts, Invitations & Hospitality or expenses incurred to Third Parties are submitted in accordance with the Company's expenses policy and specifically record the reason for the expenditure.

6.5 The prevention, detection and reporting of any form of Bribery & Corruption are the responsibility of all Employees. You must notify (x – e.g. line manager) as soon as possible if you

are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

6.6 All Employees have the responsibility to read, understand and comply with this policy. You should at all times, avoid any activity that might lead to, or suggest, a breach of this policy.

6.7 Any Employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

6.8 This policy should be read in conjunction with the Company's Gifts, Invitations & Hospitality policy, Conflicts of Interest policy and Code of Ethics.

6.9 Employees are encouraged to raise concerns about any instance, or suspicion, of malpractice at the earliest possible stage through their line manager or other available reporting mechanisms.

Further **RED FLAGS** that may indicate bribery or corruption are set out in Appendix 1.

7. Protection

7.1 Employees who refuse to take part in bribery or corruption, or report in good faith under this policy their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future will be protected from detrimental treatment/retaliation. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

8. Governance

8.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

8.2 Line manager has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it. This training shall also be given to Intermediaries.

9. Monitoring and Review

9.1 The Company will establish and put in place appropriate performance measures and reporting systems to monitor performance against metrics and compliance with the relevant policies, procedures and controls.

9.2 Line managers will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

9.3 Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective. Managers will report to the CEO at least annually on the application of this policy.

Appendix 1

RED FLAGS

The following is a list of possible red flags that may arise during the course of your work for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly to Line Manager

- you become aware that a Third Party engages in, or has been accused of engaging in, improper business practices;
- if the Third Party refuses to divulge adequate information during due diligence procedure;
- you learn that a Third Party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a ‘special relationship’ with foreign Public Officials;
- a Third Party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- a Third Party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- a Third Party requests that payment is made to a country or geographic location different from where the Third Party resides or conducts business;
- a Third Party requests an unexpected additional fee or commission to ‘facilitate’ a service;
- a Third Party demands lavish Gifts, Invitations or Hospitality before commencing or continuing contractual negotiations or provision of services;
- a Third Party requests that a payment is made to ‘overlook’ potential legal violations;
- a Third Party requests that you provide employment or some other advantage to a friend or relative;
- a Third Party requests that you make a political contribution or donation to the party or charity of their choice before agreeing to undertake a business relationship with the Company
- you receive an invoice from a Third Party that appears to be non-standard or customized;
- a Third-Party refuses to put terms agreed in writing;
- you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- a Third Party requests or requires the use of an Agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us; or
- you are offered an unusually generous gift or offered lavish hospitality by a Third Party.

Dmitry Shubenok
Country Manager



Driving Policy

1. All vehicle occupants shall always be in a driver or passenger seat and wearing a seatbelt.
2. The driver shall not put the vehicle into motion until all occupants have fastened their seatbelts. Every person in the front seat of a vehicle shall wear a 3-point inertia reel seat belt.
3. Drivers shall wear suitable sturdy footwear whilst driving. (“Flip-flops” are not permitted).
4. Drivers shall remove ignition keys from the vehicle when it is not in use.
5. Drivers shall not use GSM phones – including “hands-free” units - while driving. It is also strongly recommended that drivers stop their vehicles in a safe position when receiving or making radio calls
6. Safety devices (including speed-limiters and safety belts) shall not be tampered with.
7. Drivers shall be rested, medically fit and not under the influence of alcohol or drugs, including those prescription medicines which can cause drowsiness.
8. Drivers shall carry out pre-trip checks on their vehicles prior to driving
9. It is not permitted to carry loose items in the passenger cabins of a vehicle.
10. Light vehicle drivers shall take 15 minutes’ rest after 2 hours of continuous driving.
11. Drivers shall not work more than a 12-hour shift period. The shift period shall include loading, unloading, any other work, compulsory rest time, waiting and driving time
12. Drivers shall drive a maximum of 10 hours within the 12-hour shift period.
13. Drivers shall take a minimum of 8 hours uninterrupted off duty rest between shifts.
14. Drivers experiencing tiredness or fatigue, when driving, shall take additional rest as required.
15. Drivers shall reduce speed according to prevailing road, traffic and environmental/weather conditions.
16. Drivers shall not exceed any signposted speed limits
17. Drivers shall not exceed the following maximum speed limits at any time:

Vehicle Type	Maximum Speed Limit (km/h)	
Light Vehicle	Graded	80
	Blacktop	100
	Govt. Blacktop	120
Heavy Goods Vehicle	Graded	80
	Blacktop	80
	Govt. Blacktop	100
Light Bus	Graded	80
	Blacktop	100
	Govt. Blacktop	120
Heavy Bus	Graded	80
	Blacktop	100
	Govt. Blacktop	100

Note: Speed limits for driving at night shall be 80 kph maximum for all blacktop roads outside the Muscat Capital Area (Government and PDO) and 60 kph maximum for all graded roads. Speed limits for driving off-road shall be 50 kph maximum.

Dmitry Shubenok
Country Manager



