

Employee Code of Conduct

March 2017

Preamble

Through these rules, employees will know the standard of behaviour and performance which is expected of them, and also that a breach of such rules would render the individual liable to disciplinary action.

It is not the intention of these rules to limit in any way the freedom of the individual, but rather to guarantee harmonious relations of all employees working with the ROCSGroup .

All employees are, therefore, expected to make themselves aware of the rules which follow and, to this end, management will issue or make a copy available to them and to all new recruits.

Many of the rules are based on obligations regarded under normal practice as inherent in the individual contract of employment, such as the obligations to give faithful and honest service, to use reasonable skill and care in the work performed, to obey lawful instructions, and not commit misconduct.

Although these rules have evolved due to the particular needs of the companies forming part of the ROCS Group, it must be emphatically pointed out that it is unlikely that any set of disciplinary rules can cover all circumstances that may arise. Moreover the rules required will vary according to particular circumstances such as the type of work. It has been the aim throughout their formulation that these rules be specifically clear and concise. This is to ensure an efficient and safe performance of work and the maintenance of satisfactory relations within the ROCS Group. The rules detailed below should not, therefore, be regarded as either exhaustive or exclusive. In particular it must be noted that any incident which can be deemed as a breach of code or practice, even though it may not be specifically listed below, will render the employee liable to disciplinary measures.

It is not the intention of these rules to supersede, in any way, any existing or which might come into existence, laws prevailing at the moment of application of these rules.

Contents

| Section 1 | Attendance | 3 |
|-----------|--|----|
| Section 2 | Relationship with other employees | 3 |
| Section 3 | Relationship with Customers and/or Visitors | 4 |
| Section 4 | Health and safety | 5 |
| Section 5 | Workmanship and loyalty towards the ROCS group | 5 |
| Section 6 | Fraud and misappropriation | 6 |
| Section 7 | Miscellaneous | 7 |
| Section 8 | Corrective Action | 8 |
| Appendix | Employee statement | 10 |
| | | |

1 Attendance

Employees shall attend for work at all agreed hours, and in particular shall:

- 1.1 Observe such rules with regards to working hours as are applicable to the post requirements. Being on time for engagements is a requirement for all members of staff. If a member of staff is going to be late, management must be notified as soon as possible. Repeated instances of tardiness will result in lowered performance evaluations and /or possible disciplinary action. Everyone is required to be punctual for internal meetings and especially for meetings with clients.
- 1.2 Observe the terms of the sick/injury leave agreement in respect of the provisions regarding notification of absence and possibility of being visited by the company doctor.
- 1.3 Observe the terms of the vacation leave regulations. Vacation leave shall only be granted after an application is approved.
- 1.4 Observe conditions regarding the length of breaks.
- 1.5 Not hang around whilst on duty.
- 1.6 Not take short unofficial breaks during work time.
- 1.7 Not leave their place of work and/or visit any other department/site not directly connected with normal duties of work without prior permission.
- 1.8 Observe stop leave during specific periods of work.
- 1.9 Management staff is to inform in writing the CEO's office about whereabouts.
- 1.10 General staff is to inform in writing the payroll officer about whereabouts.
- 1.11 Attendance to staff meetings is mandatory.

2 Relationship with other Employees

Employees shall act in such a manner so as to maintain satisfactory relations within the workforce and between employees and management, and in particular:

- 2.1 Shall not act in an abusive, violent, or irresponsible (including harassment) way towards other employees.
- 2.2 Shall not act in an abusive, violent or insubordinate way towards a superior.

- 2.3 Shall not wilfully damage or abuse the property of other employees or of the employer or of any third party.
- 2.4 Shall obey legitimate instructions given by a superior.
- 2.5 Shall not indulge in propaganda, political or otherwise, which might disturb the harmony and good working of others.
- 2.6 Shall not direct foul language at any other employee or superior or any other person.
- 2.7 Shall have a duty to report to a senior officer any unethical behaviour or wrongdoing by any other employee during the course of duties.
- 2.8 Shall not indulge in foul or rowdy play.
- 2.9 Shall not obstruct company officials in the carrying out of their duty/duties.
- 2.10 Shall refrain from evaluating the work of others with whom they have intimated familial relationships, or from making hiring, promotional, transfer, or similar decisions concerning such persons. The same principles apply to consensual romantic relationships and require, at a minimum, that appropriated arrangements be made for objective decision making.

3 Relationship with Customers and/or Visitors

Employees who come in contact with visitors and customers will act in a manner which will maintain satisfactory relations with visitors and/or customers and in particular:

- 3.1 Shall treat all customers and/or visitors in a cordial manner at all times.
- 3.2 Shall provide customers and/or visitors with immediate attention and follow up their requests until they are satisfied with our service.
- 3.3 Shall make all customers and/or visitors aware of any promotions, discounts, or other information relevant to their purchase or prospective purchase.
- 3.4 Shall not wilfully damage or abuse the property of customers and/or visitors.
- 3.5 Shall not act in an abusive or violent way towards customers and/or visitors or any other members.
- 3.6 Shall maintain a good standard of dress and appearance at all times.

- 3.7 Shall (those entitled for) wear their full uniform, including badges, at all times whilst on duty. The employees are responsible for ensuring that the uniforms they wear are invariably clean and properly pressed.
- 3.8 Shall keep the working place and common areas clean and tidy at all times.
- 3.9 Shall respect and treat with confidentiality any information provided by the customers or visitors that the employee may come across in the process of his work.
- 3.10 Shall use canteen premises/facilities for any food consumption (only during break time).
- 3.11 Shall have the duty to report any wrongdoing committed by any customer and/or visitor whilst within a property of the ROCS Group.

4 Health and Safety

- 4.1 Employees shall not smoke within or directly outside the ROCS Group premises.
- 4.2 Employees shall observe such approved codes of practice as are applicable to his/her work, and in particular shall use company-supplied safety equipment, clothing, and footwear, where appropriate.
- 4.3 Employees shall not act in a manner likely to endanger fellow employees, or members of the public or the employer's property or the property of members of the public.
- 4.4 Employees shall not be under the influence of drink or drugs on duty.
- 4.5 Employees shall use company vehicles and mobile equipment during working hours and only for authorised purposes, and shall not use them to carry unauthorised passengers.
- 4.6 Only authorised employees are to operate equipment/vehicles and company tools.
- 4.7 Employees shall observe any safety instructions indicated through notices or warning signs pertaining to any particular department or place of work.

5 Workmanship and Loyalty towards the ROCS Group

5.1 Employees shall work in a careful, attentive, and competent manner, follow any laid-down working instructions, and meet required standards.

- 5.2 Employees shall not act in any way which may bring the ROCS Group into disrepute or be injurious to the efficiency of its operations.
- 5.3 Employees shall not work for another employer or on their own account during their working hours with a company part of the ROCS Group.
- 5.4 Employees shall not work for or as a competitor to their company part of the ROCS Group.
- 5.5 Employees shall not have private or personal interests sufficient to influence or appear to influence the objective exercise of their official duties.
- 5.6 Employees shall immediately disclose to the Chairman of the ROCS Group if a potential or actual conflict of interest arises in the course of work.
- 5.7 Employees shall not reveal confidential information, directly or indirectly, to an unauthorised party.
- 5.8 Employees shall not use their post of work to conduct unauthorised private trading.
- 5.9 Employees are expected to abstain from indulging in any activities with inherent risks of their eventually finding themselves in financial difficulties.
- 5.10 Employees are to notify the Chairman of the ROCS Group of all relevant personal, financial, business or other interest in particular:
 - a. any directorship, partnership, agency or any shareholding;
 - b. any interest in any activity or business in which or with which the organisation is engaged; or
 - c. any interest in goods or services recommended or supplied to the organisation.
- 5.11 Employees, whether on duty or on leave of absence, are not to allow themselves to be interviewed on questions of policies of the Group without prior authority to do so. Requests for such authority are to be submitted without delay to the Chairman of the ROCS Group.
- 5.12 Employees shall refrain from providing tips to or answering questions put to them by representatives of the media, irrespective of whether the information to be imparted is considered significant, trivial or already public knowledge. All inquiries should invariably be directed to the Chairman of the ROCS Group.

6 Fraud and Misappropriation

Employees shall not misappropriate or commit acts of fraud against other employees, the employer, customers or visitors in particular, but not limited only to, the following:

6.1 Shall complete such time and other work sheets as required in a manner truthfully reporting the work done.

- 6.2 Shall not misuse forms and devices of recording attendance at work.
- 6.3 Shall not submit false claims.
- 6.4 Shall not misappropriate or retain without authority the money or property of another employee, or of the employer, or of a customer, or of a visitor, or of any third party.
- 6.5 Shall not use any material belonging to a company part of the ROCS Group for anything except company business requirements.
- 6.6 Any equipment, documents, uniforms, literature and other articles supplied by the ROCS Group to the employee shall remain the property of the ROCS Group and must be returned to the managing representative of the ROCS Group and on request by the latter or if no longer required by the employee.
- 6.7 Shall not make false statements to the employer in relation to matters concerning their employment record.
- 6.8 Shall not accept any gifts, gratuities, payments or other incentives from suppliers or clients of the ROCS Group, unless this is done with the approval and knowledge of the Managing Director or his representative.
- 6.9 Shall not accept commissions from entities which do not form part of the ROCS Group. The ROCS Group employees are duty bound to disclose to the Chairman of the ROCS Group any offer made to them by such other entities.

7 Miscellaneous

- 7.1 No notices are to be exhibited by employees on company premises, except after prior authorisation has been granted by management.
- 7.2 Media related to work carried out by the ROCS Group staff are not to be posted to personal social media accounts. Instead, they are to be forwarded to the respective manager to be sent to the CEO's office who will, at their discretion, post to the company's social media accounts. These posts can then be shared on any social media platform.
- 7.3 Employees who move house shall inform the accounts department and payroll officer immediately, so that the employees' records may be updated accordingly.
- 7.4 Employees shall not allow personal mail to be addressed to them at the address of a company part of ROCS Group.

- 7.5 Employees shall not make or receive private telephone calls on company time except in emergency cases.
- 7.6 Use of mobile phones within the ROCS Group premises is strictly not permitted, unless specifically authorized by management.
- 7.7 Smoking breaks during working hours are strictly prohibited. Those smoking on their formal break must take the necessary measures to ensure that there is no evidence of this on their return to duty. No staff members are allowed to smoke within, or around the perimeter of, any ROCS Group premises.

N.B. The ROCS Group does not endorse any of its staff members' smoking habits, and would like to take the opportunity to remind everyone that smoking and second hand smoke have been found to harm nearly every bodily organ and organ system in the body, diminishes a person's overall health, and has been proven time and time again that smoking is highly carcinogenic (causes cancer).

- 7.8 Employees should report any accidents happening on duty to their immediate superior for processing. Delays in reporting injury on duty should be avoided since the Social Services Department reserves the right to reject claims for injury benefits that arrive at the Department later than the stipulated period from the date of the accident. The reporting of an accident does not in any way imply company liability. It is the employee's responsibility to ensure that a claim for state financial assistance is made.
- 7.9 When authorised to leave their property on ROCS Group premises, employees do so entirely at their own risk.
- 7.10 ROCS Group e-mail and internet facilities are intended solely to enable officers to work more efficiently for the benefit of the ROCS Group and its clients. Only official corporate software is allowed to be installed.
- 7.11 All communications through the ROCS Group electronic network, including any material downloaded from the internet, are the property of the ROCS Group and are subject to audits to ensure that the network is not misused.

8 Corrective Action

- 8.1 Representations which ROCS Group employees may wish to make regarding conditions of service, employment, prospects of promotion, or any other matter relating to their employment should be invariably addressed to or through the CEO's office.
- 8.2 Attempts to use influence by means of representations made otherwise are considered to be a breach of discipline.

- 8.3 Disciplinary warnings shall be valid on the employee's records for 12 months. The employee may be issued disciplinary warnings which imply the automatic termination of employment on achievement of a third warning in the span of a year.
- 8.4 In the case where gross misconduct is also a criminal offence, the employer is obliged to notify the appropriate authorities for the required action.
- 8.5 Enquires about salary, working conditions information and similar requests, shall be addressed to and dealt with by the CEO's office

Employee statement

1

This statement has been put into effect in order to ensure that all employees of The ROCS Group are aware of this document and the information within.

This employee statement is to be filled in and returned directly, or via internal mail, to the CEO's office within ten days of receiving this document. Failure to do so will not affect the applicability of this code of conduct or any of its provisions.

Date:

ID card number

acknowledge that I have received the ROCS Group Employee Code of Conduct and am obligated to read the code and to comply with its contents. This includes any amendments made by the CEO's office or directorship, which I will be informed of via email should any necessary changes arise.

Employee name

Employee signature