CORPORATE POLICY AND PROCEDURE

Anti-Bribery and Corruption Policy

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Important notice:

- This procedure is a controlled document and must not be amended without the authority of the Director.
- Any questions or feedback about this procedure should be addressed to the Quality Manager.
- This procedure is reviewed annually, or whenever business practices change.
- This document is retained indefinitely and removed only if the procedure becomes obsolete.

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1.0 Scope and purpose

The procedures set out here describe the anti-bribery and corruption programme for the whole of FSC ENGINEERING. They are designed to comply with the Law of the Republic of Azerbaijan "On Combating Corruption" and the Criminal Code of the Republic of Azerbaijan, and they follow internationally recognised good practice, including the guidance on "adequate procedures" under the UK Bribery Act 2010, which our international clients expect.

2.0 Responsibilities

The FSC ENGINEERING Business Ethics Officer (BEO) is responsible for:

- reporting all matters related to their work to the Chairman;
- making sure that anti-bribery and corruption matters are also made known and available to the Quality Manager;
- raising matters with the Chairman at their discretion;
- making sure that the Company is aware of corruption issues and puts in place and maintains measures to prevent corruption by FSC ENGINEERING, its employees or those associated with it (including advisers, customers and suppliers), including the education and training of staff;
- making sure that the Company's procedures and practices are adequate to prevent persons associated with FSC ENGINEERING from bribing or being bribed, and that they are kept up to date;
- auditing FSC ENGINEERING's actions in this area and carrying out investigations;
- liaising with external bodies and advisers on bribery and corruption matters;
- keeping up to date with developments in bribery and corruption law and practice.

Country and Department Managers are responsible for:

- identifying bribery and corruption risks in their countries;
- conducting due diligence as part of good corporate governance;
- communicating, raising awareness of and enforcing the policies and procedures in their countries;
- ensuring clear financial controls, such as adequate bookkeeping, auditing and approval of expenditure;
- ensuring transparency of transactions and disclosure of information;
- reporting all bribery and corruption matters to the BEO.

All employees are responsible for:

- preventing bribery and corruption within FSC ENGINEERING and respecting the principles of the Code of Business Ethics in their roles;
- making sure that others respect the principles of the Code of Business Ethics;
- reporting all bribery and corruption matters to the BEO.

3.0 Proportionate procedures

The procedures to prevent bribery by persons associated with FSC ENGINEERING are proportionate to the risks FSC ENGINEERING faces and to the nature, scale and complexity of its activities. The term "procedures" here covers both the bribery and corruption prevention policies and the procedures that implement them. Policies set out our anti-bribery and corruption stance and help create an anti-bribery culture. They are therefore necessary, but they will not achieve their objective unless they are properly implemented. These procedures should be read together with the other procedures and documents referred to throughout; together they form the basis of the Company's anti-bribery and corruption programme. The BEO reviews them annually to make sure they continue to meet the risks of FSC ENGINEERING's business, and whenever the structure of the business or the legislation changes in a way that may affect the programme.

3.1 Top-level involvement

Top-level management is committed to preventing bribery by persons associated with FSC ENGINEERING, and to fostering a culture of integrity in which bribery and corruption are unacceptable.

FSC ENGINEERING management's commitment to bribery and corruption prevention includes:

- communicating our anti-bribery and corruption stance annually;
- developing and approving bribery and corruption prevention procedures;
- appointing a Business Ethics Officer with a direct reporting line to the board;
- regularly renewing board statements on this issue;
- regularly considering anti-bribery and corruption issues.

3.2 Risk assessment process

FSC ENGINEERING is committed to mitigating the risk of bribery in all its business relationships, wherever in the world they are.

To mitigate the risk, the business and its leadership must understand where the risks lie.

For this purpose, the Board, together with its legal and external specialist advisers, has developed a risk matrix covering:

- Country risk: the country's corruption rating.
- Business opportunity risk: tendering by FSC ENGINEERING for contracts to provide services.
- Business partnership risk: joint tenders, joint ventures, mergers and acquisitions.
- Transactional risk: the performance of the service by FSC ENGINEERING and its reliance on third parties to deliver it, including interactions with government agencies.
- Contract value: the revenue generated, to help evaluate the extent of the risk.

Country Managers must complete a risk matrix (Exhibits 1.0 and 2.0, Section A) before any new contract is entered into, for both permanent and contract business. A risk matrix is not required at tender stage, but it must be completed if the bid is successful.

For contracts secured outside a formal tendering process, for example through a recommendation or referral, Section B of the risk matrix must also be completed.

3.2.1 Risk assessment methodology

When completing the matrix, Country Managers consider the following.

Business opportunity risk:

- The contract was secured through a transparent tendering process: low risk.
- The contract was secured through connections: medium/high risk.
- The contract is with a large multinational with a stringent business ethics policy: low risk.
- The contract is with a state-owned or partly state-owned company: medium/high risk.

Business partnership risk:

- The business was secured solely by FSC ENGINEERING: low risk.
- The business was secured through a joint venture in which FSC ENGINEERING did not have full control of the negotiation, bidding or tendering process: medium/high risk.

Transactional risk:

- The services are provided under a contract managed by FSC ENGINEERING staff who are familiar with FSC ENGINEERING's ethical standards: low risk.
- Part or all of the services under the contract are managed by intermediaries or consultants: medium/high risk.

This assessment must cover all services provided, including but not limited to: recruitment; meet and greet; travel, visas and work permits; taxation; accommodation.

Risk definitions:

- Low risk: a low probability of an act of bribery.
- Medium risk: a medium probability of an act of bribery.
- High risk: a high probability of an act of bribery.

3.2.2 Low-risk contracts

All matrices for low-risk contracts are kept on file for review and audit. The BEO reviews a sample of low-risk scores from different Country Managers every year to ensure consistency across the Company, and to confirm that the risk assessment is still relevant. Changes to business practices in a location may also affect the risk assessment, so a review should also take place when new working practices are introduced as a result of changes in legislation, visa acquisition or taxation that could affect the potential for bribery and corruption.

3.2.3 Medium/high-risk contracts

If completing the matrix identifies a medium or high bribery risk, the Director must report it immediately to the Business Ethics Officer (BEO) for further action.

For medium- and high-risk contracts, the BEO ensures that additional risk mitigation measures are implemented and reports to the CEO and the Chairman if any issues arise during the contract.

Every joint tender must be signed and approved by the BEO.

Every joint venture, merger or acquisition must be signed and approved by both the CEO and the Chairman.

3.2.4 Measuring risk mitigation controls

Risk mitigation involves ongoing monitoring of the business and regular audits of its activities and financial controls.

The effectiveness of the controls is reviewed at formal annual review meetings.

Controls include:

- training and induction;
- communication and awareness, internally and externally;
- staff acknowledgement and sign-off;
- the Code of Business Ethics, issued to all new clients, partners, contractors, suppliers and staff;
- internal and external audits of operational and financial processes;
- expense and expenditure reports;
- the financial controls framework;
- disciplinary action;
- whistle-blowing: the Confidential Reporting Policy and Procedure;
- the hospitality and gifts register;
- monthly reconciliation of expenses with the gifts and hospitality register;
- conflict of interest reporting;
- quarterly operations board meetings to review contracts;
- contractual protection;
- engagement of external service providers;
- support from accredited or industry-recognised advisory bodies on bribery legislation;
- the commercial contracts review and sign-off process;
- adequate resources, such as personnel and accounting software;
- repeated reviews of risk assessments;
- the due diligence process (see 3.3 and Exhibit 4.0);
- the New Supplier Process and New Supplier Questionnaire;
- the New Partner Evaluation Questionnaire (Exhibit 5.0);
- quarterly reconciliation of purchases with the approved supplier lists.

3.3 Due diligence of existing or prospective associated persons

Due diligence is designed to identify any red flags associated with the contracting party, so that decisions can be made on the controls needed to mitigate or remove the risk. Sometimes the risk is too great and cannot be reduced to an acceptable level, and the activity or association is avoided altogether.

Red flags:

- Is the contracting party a government official?
- If the third party is a company, is any owner, director or officer a government official?
- Is the third party (or an owner, director or officer) related to a government official?
- Does a government official have a beneficial interest in the third party?
- Has the third party made an improper payment to a government official in specific instances?
- Does the third party have a reputation for integrity? If not, what facts show a lapse of integrity?
- Has the third party (or its owners, directors or officers) been the subject of civil, criminal or regulatory action?
- Requests for offshore payment.
- Failure to disclose information about shareholders, or non-transparent shareholder information, for example offshore entities.
- Failure to have a compliance programme.
- Refusal to sign appropriate representations and warranties regarding conduct.

3.3.1 Due diligence process

Low-risk contracts

A New Client Evaluation Questionnaire (Exhibit 4.0) is sent to all new clients for completion, except "blue chip" clients. "Blue chip" clients are companies listed on a national stock exchange or on secondary markets such as NASDAQ or AIM; this can be checked online at local level. The completed questionnaire is submitted to the Contracts Manager, together with the completed risk matrix, as part of the commercial contracts review process. Completed risk matrices and questionnaires are then reviewed by the BEO.

Where a new contract is low-risk but further checks seem necessary, they can be carried out in-house, combining information provided by the company with research on the internet and in subscription databases.

Medium risk

A New Client Evaluation Questionnaire is completed as above. If medium or high risk is identified, further enquiries and due diligence will probably be needed on some or all of the parties to the transaction, including associated parties supporting FSC ENGINEERING in delivering the service to its client(s). These may be carried out in-house or by an independent consultant with access to a wider range of sources (media databases, corporate records, litigation records, credit and bankruptcy information, official watch-lists, in-country records) and languages. Checks should include:

- review and summary of all media and internet references;

- review and summary of relevant corporate records, including local archives;
- company registration and status;
- registered address;
- regulators' watch-lists;
- bankruptcy, liquidation or other credit problems;
- accounts and auditors' comments;
- litigation records;
- analysis and cross-referencing of all findings.

Due diligence can take 5–25 days. Country Managers must take this into account when a contract is in prospect and allow the BEO enough time to review the case and take appropriate action.

High risk

As for medium risk, plus:

- enquiries through local sources;
- enquiries through industry experts;
- enquiries through foreign agencies (for example, embassies or trade promotion bodies) focused on the country concerned;
- enquiries through sources close to local regulatory agencies.

If due diligence confirms a medium risk, the BEO must approve entering into the contract(s).

If due diligence confirms a high risk of bribery, the CEO and the Chairman must approve entering into the contract(s) and must identify the specific additional mitigation measures that will reduce the risk.

If the CEO and/or the Chairman are not satisfied that the high bribery risk can be materially reduced, they will not authorise the contract.

Each risk assessment matrix contains prescribed mitigation measures and controls, but not every risk can be mitigated. Where medium or high risk exists, the CEO is consulted on whether to proceed and decides to:

- avoid the association or relationship where the risk exists;
- proceed but implement further controls to reduce the risk; or
- accept the risk, with no further controls, but monitor and scrutinise the relationship closely.

Ongoing due diligence takes place through the internal audit programme and periodic review meetings with top management.

3.4 Reporting

In every quarterly operations board report, the Managing Directors report on all new contracts and their risk rating (low, medium or high). For high-risk contracts, they identify the additional mitigation steps taken.

Details of all high-risk contracts that FSC ENGINEERING declined must also be reported, with the reasons for declining.

The BEO reports to the Board quarterly on new contracts secured in the previous quarter.

On the anniversary of every high-risk contract, the BEO reports to the Board on the contract, any issues that have arisen and how they were resolved.

3.5 Gifts, hospitality and promotional expenditure, charitable and political donations, and demands for facilitation payments

The policy on gifts, hospitality and promotional expenditure, charitable and political donations, and demands for facilitation payments is set out in the Company's Code of Business Ethics.

FSC ENGINEERING's terms and conditions of employment also prohibit employees from accepting or offering gifts or hospitality to customers, suppliers or any other person connected with the Company's business with the intention of gaining a business advantage. The Code sets out the approval process and the financial limits for accepting and offering gifts.

All employees must familiarise themselves with the Code and confirm annually that they have read and understood it.

The Code forms part of the employee handbook and is published on the Company's website. It is reviewed annually and updated as appropriate, and the Business Ethics Officer communicates any changes throughout the organisation.

3.6 Candidate referral schemes

Candidate referral schemes are not prohibited by the anti-corruption legislation of the Republic of Azerbaijan, but care is needed because the risks are obvious. The justification for referral payments must be carefully considered and recorded to ensure that a payment is not a bribe. Referral payments can raise the following bribery issues:

- payments to government employees or their direct contacts or families;
- payments to people associated with FSC ENGINEERING's contractors, whether FSC ENGINEERING supplies services to or procures services for the contractor, especially contractors' employees and their families;
- the absence of evidence that there was a real referral and that real work was done;
- lack of knowledge or assurance that the money is not being passed on by the party that made the referral;
- any suggestion that the payments were disproportionate and not a proper fee for the value of the business and the work done.

Therefore, anyone receiving a referral payment from FSC ENGINEERING is paid only once the service has been provided. All payments must be approved by the relevant manager and records must be kept. Before receiving any payment, the person making the referral signs the following declaration:

"This fee is paid for the referral of the person(s) named below. Payment of this referral fee is not intended in any way to allow a breach of any obligation the referring party may have to third parties.

This fee is paid on the mutual understanding and agreement of both parties that the referring party is the sole beneficiary of this payment."

Name of referred person(s)	
Position(s) referred for	
Name of referee	
Signature / Date	

3.7 Direct and indirect employment, including recruitment, terms and conditions, disciplinary action and remuneration

Employees at every level, including those working on a consultancy or temporary basis, must comply with the Company's Anti-Bribery and Corruption Policy and procedures as part of their contract of employment. Failure to do so may lead to disciplinary action under the disciplinary procedures, up to and including dismissal without notice, in accordance with FSC ENGINEERING's HR policies.

The Internal Recruitment and Induction Procedure mitigates bribery and corruption during hiring through questions in the screening process. The application form asks applicants to state whether they have any unspent criminal convictions and, if so, to give details.

Salaries are paid in line with the Company's salary scale, which is regularly reviewed against market rates.

The Internal Recruitment and Induction Procedure is part of the HR policies and procedures. It is reviewed annually and updated as appropriate, and may also be reviewed whenever employment legislation changes. FSC ENGINEERING's HR Manager communicates any changes throughout the organisation.

3.8 Governance of business relationships with all other associated persons, including pre- and post-contractual agreements

Business relationships include:

- supplier agreements: where goods or services are provided directly to FSC ENGINEERING;
- partnering agreements: where a third-party company is needed to help provide services to the end client.

All associated third-party companies must receive a copy of FSC ENGINEERING's Code of Business Ethics, so that they understand FSC ENGINEERING's stance on bribery and corruption and that FSC ENGINEERING will test their suitability as business partners through risk assessment as a normal part of doing business. Depending on the services provided, further controls may be needed if a supplier or partner has no anti-bribery and corruption policies or procedures.

Supplier agreements

In line with the Company's Quality Manual and the New Supplier Process, every new supplier must complete a Supplier Evaluation Questionnaire if our annual spend with them reaches, or is expected to

reach, more than 6,000 AZN, or if we expect repeated supply. The questionnaire includes a section on bribery and corruption:

- the name and position of the person responsible for governance and ethics;
- whether the supplier has a business policy or code of conduct (yes/no);
- whether the business or its affiliates have been cited or investigated by a government agency for material non-compliance with any government rule or regulation in the past five years.

A copy of FSC ENGINEERING's Code of Business Ethics must also be provided to all new suppliers.

All suppliers, whether for single or repeated supply, are entered on the local Approved Suppliers List.

The questionnaires are reviewed and repeated periodically. An annual supplier review is also carried out, in accordance with the New Supplier Process and FSC ENGINEERING's Quality Manual, initiated by the Quality Manager.

Partnering agreements

Before entering into any such agreement, including sub-vendor relationships, a New Partner Evaluation Form (Exhibit 5.0) must be completed for every new partner and approved by the relevant Managing Director. The completed form is then submitted to the BEO for review. Further due diligence, as set out in section 3.3, is carried out when required. All potential partners are given a copy of the Code of Business Ethics.

As set out in the Company's Commercial Contracts Procedure, all contracts for services must include a clause covering breaches of the Code of Business Ethics as it applies to the other party.

3.9 Financial and commercial controls, such as adequate bookkeeping, auditing and approval of expenditure

FSC ENGINEERING keeps its accounting records in accordance with the legislation of the Republic of Azerbaijan. The accounts are audited as required by law, to confirm that the accounting records are adequate and that the accounts give a true and fair view of the Company's performance.

Approval of expenditure is governed by the Company's authorisation protocol and by the procedures set out in the Financial Procedures and Controls Manual.

3.10 Transparency of transactions and disclosure of information

Transactions are controlled according to their nature.

Revenue and cost of sales:

- Contracts with contractors disclose the rates and remuneration they will receive, based on the rates agreed with our end clients through a works order or purchase order. Contractors complete time sheets, which are approved by the client's delegated staff, and invoices are raised accordingly at the agreed rates. Incorrect invoices are rejected by the customer.
- Staff are paid through local or expatriate payrolls, with the appropriate tax deducted.
- Monthly margins are reviewed analytically, and movements are checked and explained.

Purchase ledger:

- Because of the nature of the business, the purchase ledger is not large (around 250 transactions a month) and covers items such as rent, office expenses, contractor flights and hotels (controlled and booked by the Operations team), sub-vendors and consultancy.
- Supplier accounts are opened in accordance with the Company's Financial Controls and Procedures Manual, which ensures that suppliers are approved by FSC ENGINEERING. Any interest in, or pre-existing relationship with, a supplier must be declared; if one exists, the supplier can be used only with the approval of an unconnected Board Director, who approves each transaction.
- Purchase orders issued under the authorisation protocol ensure that orders and invoice payments are carried out correctly.
- Payments are occasionally made without a purchase order; in these cases, invoices or appropriate supporting documents are supplied and authorised under the authorisation protocol.
- Invoices are not processed unless properly authorised. Accounts payable staff flag any unusual expenses; these normally relate to staff or contractor expenses.

Expenses:

- The Company has a detailed expenses procedure for staff, set out in the Company's Expenses Policy.
- Contractor expenses must be in line with the terms agreed with the client and are authorised by the client's representatives.
- The Company is reviewing an automated expenses system with built-in controls and limits.

Hospitality and acceptance of gifts:

FSC ENGINEERING has a declaration procedure for hospitality and gifts. Attendance at hospitality events hosted by customers or potential customers must be made known to line management. Attendance is permitted if the invitation is open to all customers, or to all suppliers of the client, and is not conditional.

Attendance at hospitality events to which only selected individuals or companies are invited requires the approval of the BEO. The BEO keeps a register of gifts received with a value above 150 AZN. Details of the sender, the gift and the reason for it must be e-mailed to the BEO. Any intention to send a gift to a customer, or to invite a customer to a hospitality event, must be made known to line management for approval, and the details e-mailed to the BEO to be recorded in the register.

3.11 Decision making, such as delegation of authority, separation of functions and avoidance of conflicts of interest

Delegation of authority is managed under the delegated authority protocol, which sets out the authorisation required for each category of spending and is maintained by the CFO and the Financial Controller.

Functions are separated where possible, although in some offices this is limited by the number of staff.

FSC ENGINEERING personnel must avoid any situation or activity in which a conflict of interest may arise, or which could interfere with their ability to make impartial decisions in the best interest of FSC ENGINEERING and in full accordance with the Code of Business Ethics.

Any such interest that relates directly to a matter or project a staff member is working on must be made known to the Business Ethics Officer. If the staff member should not continue to work on the matter, the Business Ethics Officer will tell them.

Failure to comply with this section will lead to disciplinary measures, up to and including dismissal without notice, in accordance with FSC ENGINEERING's HR policies.

3.12 Reporting of bribery, including "speak up" or whistle-blowing procedures

Under FSC ENGINEERING's Confidential Reporting Policy, employees can bring to management's attention any concerns about unacceptable business conduct or unscrupulous activities, discreetly and without fear of the consequences.

The policy has been explained to all staff and is covered in the Staff Handbook, which all existing employees have received.

New employees receive a copy of the Staff Handbook as part of their HR induction, which covers company policies and procedures.

Under this policy, employees may first discuss their concerns with a Director before reporting the situation formally, or approach the BEO or the HR Manager directly if they prefer. The matter is treated in confidence, subject to the requirements of the law.

The BEO conducts a thorough investigation and reports the findings to the HR Manager and, where appropriate, to the Chairman or the Chief Executive. The BEO and the relevant senior managers then decide on the appropriate action. While human error and misconduct are significant factors in bribery and corruption, FSC ENGINEERING's procedures are also examined for effectiveness during an investigation. The investigation also aims to identify where controls failed and the root cause, to decide the corrective action needed to prevent a recurrence. Where there is evidence of criminal behaviour, FSC ENGINEERING reports it to the proper authorities.

The BEO keeps a record of all bribery and corruption issues raised under the Confidential Reporting Policy, whether or not the claims are substantiated, to have an overall view of all issues across the business. Periodic analysis gives the BEO an early warning of individuals or companies whose activities or behaviour may breach the Code of Business Ethics and this Anti-Bribery and Corruption Procedure.

3.13 Implementation of bribery prevention procedures

Implementation of the policies and procedures includes communication, briefings and training for staff, as well as external communication with clients, contractors and suppliers. FSC ENGINEERING has put in place:

- an Anti-Bribery and Corruption Statement from the Chairman and the CEO, issued to all employees, clients and contractors;
- the appointment of a BEO with overall responsibility and a direct reporting line to the Chief Executive and the Chairman;
- an anti-bribery and corruption clause in employment contracts and/or a signed acknowledgement of understanding by employees, with signed copies kept on HR files;

- an application form in the Recruitment Procedure asking applicants to declare any previous criminal convictions;
- the Confidential Reporting Policy and Procedure;
- an expenses approval process at senior level, requiring the CEO's sign-off;
- a Hospitality Register;
- a Gift Register;
- a Conflict of Interest Register;
- quarterly operations board meetings to review new contracts;
- a formal annual management review meeting with a specific focus on the Anti-Bribery and Corruption Policy and Procedures;
- training on the Anti-Bribery and Corruption Procedure for FSC ENGINEERING employees, as appropriate, with attendees completing a sign-off form kept on their personnel files to show the procedure was received and understood;
- a controls framework for finance (the Finance Procedure);
- weekly review of consolidated reports, with closer scrutiny of figures and transactions;
- a mechanism to capture any red flags and to take corrective action or further due diligence as required;
- an internal audit schedule for operational and financial processes under the Anti-Bribery and Corruption policies and procedures, with each process audited at least annually;
- client and contractor service reviews and feedback, with specific questions on business ethics included in customer service questionnaires.

3.14 Communication of the organisation's policies and procedures and training in their application

Policies and procedures are communicated by e-mail memo, briefing, presentation or training, depending on the scale and detail of the information. Records of training and briefings delivered to employees are kept on HR files and/or training registers.

The communication process is as follows:

- Implementation of policies and procedures is supported by briefing presentations to senior management and to staff who deal with clients and contractors regularly.
- Where necessary, implementation is supported by briefing presentations to clients and third-party companies.
- Changes to company policies and procedures are communicated to employees by e-mail memo, presentation or training.
- The HR induction covers the anti-bribery and corruption policy and procedures, including confidential reporting (whistle-blowing) and the Code of Business Ethics.
- The Anti-Bribery and Corruption Statement from the Chairman and the CEO is issued to all employees, clients and contractors.
- The Confidential Reporting Policy is communicated to staff regularly.

- A Disciplinary Policy and Procedure is in place and is communicated during induction.
- The Code of Business Ethics is communicated to staff regularly and is available to customers on the FSC ENGINEERING website.

3.15 Monitoring, review and evaluation of bribery prevention

Continuous monitoring, review and evaluation are essential to make sure the controls work effectively and that opportunities for improvement are identified and acted on. This also supports ongoing due diligence and attention to areas of concern. A continued focus on anti-bribery and corruption helps build a culture of ethical practice and a zero-tolerance ethos.

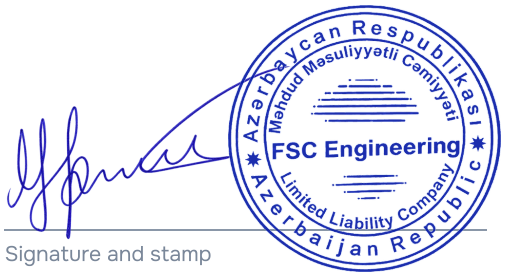
Ongoing monitoring and review include:

- review of confidential reporting (whistle-blowing) cases: the BEO records the number and nature of the situations reported, including locations, customers and partners involved;
- review of the registers, for example looking for consistent or regular spending and activities with individuals or companies that may be a warning sign;
- review and repetition of risk assessments to make sure they are still relevant, checking for changes in risk levels due to changes in practice or external factors (legislation, taxation, etc.), and whether the controls remain effective and relevant;
- a quarterly board report by the BEO on new contracts and their risk assessment results (low, medium or high);
- a formal annual management review meeting attended by the BEO, the Quality Manager and the Chairman, reviewing the hospitality and gift registers, issues raised through the Confidential Reporting Procedure, the risk assessment review, internal audit results and the audit schedule for the year ahead;
- questions on FSC ENGINEERING's commitment to anti-bribery and corruption in the bi-annual customer service review, through which FSC ENGINEERING actively seeks feedback on and endorsement of its practices;
- annual review of policies and procedures;
- internal audits in line with the agreed schedule;
- annual external audits, such as tax, statutory and quality audits;
- reissue of the Code of Business Ethics to staff, clients, partners, contractors and suppliers annually, or whenever business practices or operating procedures change significantly (for example, because of changes in legislation or taxation).

APPROVED BY

Chief Executive Officer

Ilyas Afandiyev



Signature and stamp

27.10.2026

Date