



COMMERCIAL & CONTRACTS POLICY

ROCKSURE INTERNATIONAL LTD

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POLICY NAME	CONTRACTOR CODE OF CONDUCT			POLICY NO.	
EFFECTIVE DATE	MARCH 2021	DATE OF LAST REVISION		VERSION NO.	
ADMINISTRATOR RESPONSIBLE	COMMERCIAL DEPARTMENT	CONTACT INFORMATION			
APPLIES TO Apply group names to define applicable areas of staff.					
GROUP 1		GROUP 2		GROUP 3	
GROUP 4		GROUP 5		GROUP 6	

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR

ITEM 1.0 APPROVAL AND REVIEW

N/A

ITEM 2.0 ADDITIONAL NOTES

ITEM 3.0 SCOPE

Describe to what and to whom this policy applies.

This is a Code of Conduct for Contractors and suppliers who are doing business with Rocksurre International Limited and the objective is to deter wrongdoing and to promote, among other things, honest and ethical conduct.

ITEM 4.0 POLICY STATEMENT

Describe the policy and the reason for the policy.

Rocksurre International is committed to transacting business in accordance with relevant laws and in a way that meets the highest level of integrity and ethical standards. Contractors engaged by Rocksurre are therefore required to share the same commitment.

ITEM 5.0 TERMS AND DEFINITIONS

Define any acronyms, jargon, or terms that might have multiple meanings.

TERM	DEFINITION
Contractor	Any business partner, company, consultants, suppliers, among others with whom Rocksurre is conducting business with or is pursuing a business relationship

ITEM 6.0 POLICY SECTIONS

ITEM 6.1 INTRODUCTION

6.1.1. The Code of Conduct presents the standards of conduct to which Contractors and their employees must observe while conducting business with or on behalf of Rocksurre.

6.1.2. Contractors must take necessary actions to ensure that this is communicated to and understood and followed by their employees while doing business with or on behalf of Rocksurre, as their actions or inactions may reflect on Rocksurre's reputation or affect the work environment in which they operate.

6.1.3. Consequently, any omission in complying with the standards presented in the Code of Conduct and all applicable local and state laws could result in termination of contract with Rocksurre.

6.1.4. Rocksurre will not hesitate to remove employees of Contractor who present themselves in a manner that is not consistent with this Code of Conduct from Rocksurre's property.

6.1.5. Rocksurre will audit the activities of Contractors to ensure compliance with this Code of Conduct.

Rocksurre recognises the important role Contractors and agents play in Rocksurre's ability to deliver quality services to its Clients while observing the highest standards of ethical conduct and therefore appreciates the commitment of contractors in ensuring that compliance of this Code of Conduct becomes a priority as they work with Rocksurre.

6.2 PRINCIPLES OF CONDUCT

6.2.1 Conflicts of Interest

Rocksure employees are expected to act in the best interest of the company to prevent situations that could result in a conflict with the company's interests. Equally, Contractors and agents will restrain themselves in a manner to avert even the presence of a conflict of interest with Rocksure. Contractors may submit concerns or complaints regarding conflict of interest on confidential basis via company's website at www.rocksureintl.com.

6.2.2 Quality of Products and Services

Rocksure requires Contractors engaged to deliver quality products and services at fairly and reasonable price. Additionally, any specific requirements as stated in the contract must meet or exceed acceptable standards, including that of safety and environmental standards.

6.2.3 Workplace Health, Safety and Environment

Safety is core to Rocksure's operations and the company is dedicated to providing safety culture with strong programs of personal safety, accident and injury prevention, wellness promotion, and compliance with applicable environmental, health and safety laws and regulations.

Adherence to good health and safety practices and compliance with applicable health and safety regulations are a responsibility of all contractors and staff. Compliance with this commitment is a condition of your engagement with Rocksure. Refer to Rocksure's policy on Health, Safety and Environment.

6.2.4 Reporting Injuries, Damages and Unsafe Conditions

Besides any other legal reporting requirements, Contractors must report any occupational injuries, unsafe conditions or practices and damage to property occurring as a result of the Contractor's or its agent's activities for or on behalf of Rocksure to the company's contact person.

6.2.5 Alcohol and Drug Use

Rocksure is concerned and recognizes a responsibility to providing a safe, healthy and productive work environment for all employees including its contractors. The use of illegal drugs or abuse of alcohol tend to make employees less productive, less reliable and prone to accidents and absenteeism resulting in potential increased cost, delay and risk to the Company's business.

As part of the effort to ensure Alcohol and Drug-Free Workplace, Contractors are expected to notify their employees to abstain from use of alcohol or illegal drugs or be under the influence of prescription drugs that impair a person's ability to perform work in a safe and efficient manner.

6.2.6 Workplace Violence

Rocksure abhors any act or threat of physical violence, intimidation and harassment at the work place or work-related incidents that may occur off-site. will not be tolerated. Matters of such nature may result in termination of employment contract or removal from the company property.

6.2.7 Employment and Human Rights

Rocksure complies with all applicable human rights and labour laws and expects its business partners to share the same commitments such as,

- a. Equal Employment Opportunity and No Harassment – Contractors shall not discriminate during employment and shall create and maintain a work environment free of discriminatory acts.
- b. Labour Conditions – No child and or forced labour will be used in any Contract engagement with Rocksure. Contractors shall not use workers under the legal minimum working age as required by law.

6.2.8 Business Records

Rocksure accords importance to accurate records in meeting its legal, regulatory and financial obligations. Contractors and their employees must ensure that all communications, proposals, deliverables, time sheets, invoices, records and accounts are truthful, accurate, complete, and understandable and provided in a timely manner to Rocksure. Contractors and their staff are encouraged not to falsify or provide inaccurate information to Rocksure.

6.2.9 Anti-Corruption

As part of measures to avert corruption, policies have been put in place by Rocksure to discourage employees from engaging in any act of corruption. Contractors and their employees shall comply with the provisions of these policies and must not engage in any form of bribery, extortion, embezzlement or other corrupt practices.

6.2.10 Fair Competition

Contractors transacting business for or on behalf of Rocksure must uphold fair business standards in their dealings.

6.2.11 Use of Assets

It is essential that Contractor and its staff must take good care of Rocksure's tangible and intangible property and ensure that use of such assets is for ROCKSURE business-related purposes only.

6.2.12 Confidentiality

This is considered as any or all information related to Rocksure and its Affiliates that is not generally known by the public and that may be detrimental to ROCKSURE, its employees or its Affiliates if disclosed. Such classified information if obtained by Contractor or its employees in the course of performing services for Rocksure should be considered confidential. The responsibility to safeguard Rocksure's confidential information continues even after the closure of business dealings with Rocksure.

6.2.13 Premises Security

This Code of Conduct enjoins that Contractors and staff must comply with all applicable rules and regulations in respect to Rocksure's physical security procedures at all times while on company's premises.

6.2.14 Customer Relations

Rocksure encourages Contractors working in direct contact with Rocksure's clients to:

- a) Be accurate and truthful when providing information.
- b) Bear in mind that their actions and conduct may affect the reputation of Rocksure.

6.2.15 Reporting Violations

This Code of Conduct does not envisage or specifically address all potential ethical issues that may arise as part of contractual relationship with Rocksure. Therefore, Contractors are advised to contact Rocksure with questions or for guidance on how to proceed in a given situation.

6.2.16 Code of Conduct Revision

The company may amend and modify this Contractor Code of Conduct as and when the company deems it right. The provisions of this Code of Conduct not intended to change any obligations presented in any of the Contractor's agreement with Rocksure and in case of any conflict, the terms in the contract agreement with Rocksure will be considered.

ITEM 7.0 EXCEPTIONS

Describe exceptions here.

ITEM 8.0 RELATED POLICIES AND OTHER REFERENCES

CODE OF CONDUCT, BRIBERY & CORRUPTION POLICY, HUMAN RIGHT POLICY, CONFLICT OF INTEREST POLICY,

ITEM 9.0 ROLES AND RESPONSIBILITIES

List the job titles and business offices directly responsible for the policy.

ROLE	RESPONSIBILITY
9.1 COMMERCIAL MANAGER	9.1.1 The Commercial Manager will ensure that the contractor code of conduct is included as a contractual requirement in agreements with external contractors. 9.1.2 Will work with contractors to ensure that they understand and agree to the code of conduct's provisions before entering into contracts. 9.1.3 The Commercial Manager will oversees contractors' performance and compliance with the code of conduct throughout the duration of the project or contract.
9.2 DIRECTORS	9.2.1 Directors will provide the necessary oversight and support to ensure that the contractor code of conduct aligns with the organization's values and objectives.

	9.2.2	Will allocate resources to ensure that the code of conduct's requirements are effectively communicated, monitored, and enforced.
9.3 Safety Manager/Representative	9.3.1	The Safety Manager will ensure that safety standards are aligned with ethical principles outlined in the code of conduct, emphasizing the importance of safe and ethical work practices.
	9.3.2	Will communicate and collaborate with the Compliance Manager to report any violations of the contractor code of conduct that relate to safety issues.
9.4 Project Manager	9.4.1	The Project Manager will integrate the contractor code of conduct into project planning and execution, ensuring that ethical considerations are woven into project deliverables.
	9.4.2	Will oversee contractors' work to ensure it adheres to the code of conduct and relevant ethical guidelines.
9.5 Human Resources Manager/Representative	9.5.1	The HR Manager will ensure that contractors are familiar with the code of conduct during the onboarding process, emphasizing its significance to the organization's culture.
	9.5.2	Will provide training or resources to contractors to ensure they understand the expectations set forth in the code of conduct.
	9.5.3	The HR Manager will address any employee or contractor complaints related to ethical violations and ensures proper channels for reporting are available.
9.6 PIU Manager	9.6.1	The PIU Manager will collaborate with relevant stakeholders to develop, update, and communicate the contractor code of conduct, outlining expectations for ethical behavior.
	9.6.2	Will organize training sessions and communication efforts to ensure contractors understand and are aware of the code of conduct's requirements.
	9.6.3	The PIU Manager will monitor contractors' compliance with the code of conduct, conducts audits, and reports any non-compliance to senior management.
	9.6.4	Will investigate reported violations, collaborate with other roles (such as Safety Managers), and take appropriate actions to address violations.
	9.6.5	The PIU Manager will continuously improve the code of conduct based on feedback, changes in regulations, and lessons learned.

ITEM 10.0 CONTACTS

List contacts in the table.

SUBJECT	CONTACT	PHONE	EMAIL
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