

COMPLIANCE POLICY

Quality will pervade Verger's entire process of conformity services, which involves all employees, officers board members, contractors, and third party representatives working with or on behalf of the organization. Our quality service culture is characterised by client focus and continuous improvement in all we do. The delivery of quality services shall be the focus of everyone at Verger as we achieve success in the long-term pursuit of quality. In accordance with maintaining quality services and TIC Council Compliance Code, Verger is deemed to commit to the following principles:

- Integrity
- Conflict of Interest
- Confidentiality and data protection
- Anti-bribery
- Fair Business Conduct
- Health and Safety
- Fair Labour

To ensure the effectiveness of these principles, Verger shall submit an annual independent examination whose results are reported to TIC council.

All Verger Directors and Employees must at all times perform their duties in accordance with the requirements of the compliance principles and every employee will sign a declaration affirming adherence to the Compliance Programme. Failure to comply will be considered a serious breach of Verger's Compliance Policy and a result in immediate disciplinary actions.

❖ **INTERGITY:**

Verger's work shall be carried out in a professional, independent and impartial manner in all of its activities.

Verger is committed to working honestly and to ensure impartiality and independent in providing third-party inspection, audit, product certification and assessment services. All data, results and other material facts shall be reported in good faith and shall not be improperly changed. Where approved processes and methods make provision for tolerances in results, Verger will not tolerate violation of Integrity, Impartiality, Confidentiality and Codes.

Verger shall report certification and inspection data, other material facts in good faith, and shall not improperly change them and shall only issue reports and certificates that correctly present the actual findings, professional opinions or results obtained.

Employees have been instructed on how to handle situations where clients may attempt to misuse tolerances in order to achieve favorable or acceptable results

Integrity is being monitored at Verger as per policy of impartiality, confidentiality and top management declaration of principle regarding Impartiality, Independence and Integrity.

Verger will ensure the implementation of the above principles through our Quality System Processes.

All employees of Verger are deemed to have signed the Code of Conduct. Verger personnel must ensure that the Verger's reputation is not compromised by dishonest, disloyal or corrupt behavior.

❖ **CONFLICT OF INTEREST:**

Verger commits itself to avoiding the risk of Conflict of Interest between:

The company and related entities in which the company has financial or commercial interests and to which it is required to provide services, and the company's division engaged in different activities, but which may be providing services to either same client or each other.

Verger shall avoid conflicts of interest between group companies and/or divisions engaged in different activities, but which may be providing services either to the same client or to each other.

Verger Employees must not, either personally or through relatives, friends, or intermediaries, hold a financial interest in a supplier, client, or competitor of the Member. The only exception is the purchase of publicly traded shares in such entities, provided the investment is minor, does not allow the employee to influence the company's decisions, and does not create a financial dependency on its performance.

Employees must not take up or hold any role, job, or official position within a competitor or a client organization.

Employees must not engage in company-related transactions with family members or with individuals or organizations connected to themselves or their families. Additionally, they must not hire a family member without obtaining prior approval from their supervisor or management.

Verger shall ensure that all employees avoid conflicts of interest with the activities of the company.

❖ **CONFIDENTIALITY AND DATA PROTECTION:**

All employees, including partners of Verger Group will treat all information received in the course of the provision of its services as confidential to the extent that such information is not already published, generally available to third parties or otherwise in the public domain.

Verger's intellectual property rights, including technical information, inventions, systems etc, developed or acquired by the company, together with information governed by non-disclosure agreements, must remain confidential.

All employees of Verger are deemed to have signed the declaration. A declaration of confidentiality and Impartiality includes that the full-time employees as well as partners of Verger shall not at any time disclose any confidential information except as may be necessary for the proper performance of their duties or as may be specifically authorized in writing to them.

After the end of the contract with Verger, all employees and partners shall, without retaining any copies or records thereof, immediately return all such documents to Verger Group.

The technical and business information of Verger is subject to confidential information and shall be treated as confidential even after the end of contract.

The employees and partners of Verger Group will not accept any assignment offered which relates to companies or individuals with whom they have financial and business interest or to whom they, or VERGER, have provided consultancy services within a period of two years prior to the assignment. Information should be given to authorized persons only, and in the case of any doubt advice should be sought from the Verger's Compliance Officer.

All intermediaries, joint venture partners, agents, subcontractors, franchisees, contractors, and suppliers are informed about the importance of confidentiality and are instructed not to share any confidential information with unauthorized parties.

❖ **ANTI-BRIBERY:**

Verger categorically prohibit the offer or acceptance of a bribe in any form, including kickbacks on any portion of a contract payment. The acceptance of any type of bribe by the employees of Verger from its partner is highly prohibited.

Verger prohibit the use of any routes or channels for provision of improper benefits to, or receipt of improper benefits from, customers, agents, contractors, suppliers, or employees of any such party, or government officials.

The above policies are not intended to prohibit normal and appropriate hospitality and gifts that are customary in a given market, providing that they are proportionate and properly recorded and documented. Intermediaries must be Compensated fairly and transparently under a signed agreement , No payments shall be made in cash, to offshore accounts, or to non-contracted entities.

In case of any doubt advice and permission must be obtained from the Compliance Officer.

All political, charitable contributions and sponsorships are recorded separately in dedicated general ledgers across all operations and consolidated centrally. A clear criteria guide such payments. Any facilitation payments identified are investigated and eliminated by the Organization.

❖ **FAIR BUSINESS CONDUCT:**

Verger's employees are committed to competing fairly. Verger shall only present itself and conduct marketing, including any comparisons with or references to competitors or their services, in a manner that is truthful and not deceptive or misleading or likely to mislead. Verger is committed to maintaining business ethics and integrity, and shall not do anything which would bring its reputation, or the reputation of TIC Council or the TIC industry, into disrepute.

Verger maintains a fair business that prohibits false statements about competitors, unfair competition practices, contract breaches, and data theft. All presentations and publications clearly and truthfully represent its affiliations, capabilities, experience, and services.

❖ **HEALTH AND SAFETY:**

All employees are required to inform management of any condition that creates a danger to the environment, poses health and safety hazards, or may be a violation of law or ethical conduct. Verger shall implement adequate training and procedures to protect the health and safety of employees, customers and third parties and shall monitor incidents with the view of minimizing risks in the course of business operations.

❖ **FAIR LABOUR:**

Verger acknowledges its social and ethical responsibility towards its employees, local communities, and the broader environment in which it operates. In accordance with TIC Council compliance principles, Verger is committed to upholding internationally recognized human rights and promoting fair labour practices throughout its operations.

This includes ensuring safe and equitable working conditions, the prohibition of forced or child labour, fair wages, reasonable working hours, and the right to freedom of association. Verger shall continually strive to create a respectful, inclusive, and non-discriminatory work environment that supports the dignity, well-being, and development of every employee and stakeholder involved in its value chain.

