

QIMA Compliance Code

Contents

QIMA Compliance Principles

1. Integrity.....	2
2. Conflicts of Interest.....	2
3. Confidentiality and Data Protection	2
4. Anti-bribery.....	2
5. Fair Business Conduct	2
6. Health and Safety.....	2
7. Fair Labour	2

QIMA Compliance Program

I. QIMA Compliance Committee	3
A) Compliance Committee members	3
B) Compliance Officer.....	3
II. Employee Recruitment, Commitment and Training.....	4
A) Recruitment	4
B) Training	5
C) Employee Rights, Commitments and Sanctions.....	5
III. QIMA’s Control System.....	6
A) Business Relationships	6
B) Complaints and Disciplinary Procedures.....	6
C) Accounting and book keeping.....	6
D) Security Measures.....	6
E) External Communications	7
F) Health and Safety.....	7
G) Compliance summary report	7
IV. Verification	8
A) Management Declaration	8
B) Internal Audit	8
C) External Examination	8
V. Appendix List	9

QIMA Compliance Principles

1. Integrity

- QIMA shall operate in a professional, independent and impartial manner in its all activities.
- QIMA shall carry out its work honestly and shall not tolerate any deviation from its approved methods and procedures. Where approved test methods make provision for tolerances in results, QIMA shall ensure that such tolerances are not abused to alter the actual test findings.
- QIMA shall report data, test results and 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.

2. Conflicts of Interest

- QIMA shall avoid conflicts of interest with any related entity in which it has a financial or commercial interest and to which it is required to provide services.
- QIMA shall avoid conflicts of interest between QIMA and/or divisions engaged in different activities but which may be providing services to either the same client or each other.
- QIMA shall ensure that its employees avoid conflicts of interest with the activities of QIMA.

3. Confidentiality and Data Protection

- QIMA shall respect the confidentiality and privacy of client's information and ensure processes are in place to adequately protect such information.

4. Anti-bribery

- QIMA shall prohibit the offer or acceptance of a bribe in any form, including kickbacks on any portion of a contract payment.
- QIMA shall prohibit the use of any routes or channels for provision of improper benefits to, or receipt of improper benefits from, customers, agents, contractors, suppliers, employees of any such party, or government officials.

5. Fair Business Conduct

- QIMA shall conduct itself with the highest standards of 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.

6. Health and Safety

- QIMA 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 minimising risks in the course of business operations.

7. Fair Labour

- QIMA is aware of its social responsibility for its employees and the people, communities and environments in which it works and shall respect human rights.

QIMA Compliance Programme

Implementation

QIMA is committed to adhering to and implementing the Compliance Programme throughout its organisation:

I. QIMA Compliance Committee

A) Compliance Committee members

Following persons are nominated as part of QIMA Compliance Committee:

- QIMA Chief Executive Officer
- QIMA Chief Operating Officer
- QIMA Global Operations Director and Compliance Officer
- QIMA Human Resources Director
- QIMA Group Legal Counsel
- Sustainability Solutions Director
- QIMA Compliance Manager

QIMA Compliance Committee members must confirm and acknowledge their nomination through the signature of their appointment letter. (Appendix A)

QIMA Compliance Committee members signed appointment letters will be filed and kept by QIMA's Compliance Officer.

QIMA Compliance Committee will hold meetings annually, or at any time in case of an unusual situation to oversee the Compliance Programme, discuss the progress and provide policy guidance.

QIMA Compliance Committee affirm their commitment to carrying out this Code by adopting and publishing QIMA's own Principles and the key elements of implementation, in accordance with TIC Council Compliance Principles and Requirements for Implementation, TIC Council Compliance Programme Guideline and by putting it into effect throughout the whole organisation.

B) Compliance Officer

QIMA's Global Operations Director is nominated as QIMA's Compliance Officer:

The Compliance Officer may nominate delegates to perform some or all of his/her functions within specified parts of the organisation.

Additionally, QIMA senior managers are accountable for implementing the Programme in their areas of responsibility.

QIMA Compliance Officer must confirm and acknowledge his/her nomination through the signature of the appointment letter. (Appendix C)

The Compliance Officer has the responsibility and authority under the Compliance Committee for coordinating the execution of the Compliance Programme throughout QIMA's organisation.

The Compliance Officer should initiate an investigation into any violation of the following Programme reported to him/her or coming to his/her knowledge.

QIMA's procedure for the handling of such investigations and sanctions includes the creation of 4 kinds of documents:

1. A record maintenance of all reported violations and subsequent actions taken. Maintenance record of all reported violations and subsequent actions taken follow TIC Council Compliance Code. This record is only accessible by the Compliance officer; he is the only one in charge of the procedure although he may delegate a part of the procedure. Maintenance record of all reported violations is part of QIMA Enterprise Resource planning system and includes (without being limited to):
 - Date of the violation
 - Date violation was reported to the Compliance officer or came to his knowledge
 - Alleged perpetrator's name(s)
 - Description of the violation
 - Date of the interview with the alleged perpetrator
 - Description of the investigation
 - Annex document: signed testimonials, audio recording, video recording, etc.
 - Disciplinary measures taken
2. A record of the alleged perpetrator interview. Alleged perpetrator of such violation has the right to be heard. Before presenting ongoing investigations to the Compliance Committee, the Compliance Officer should have heard the alleged perpetrator or at least contacted him and informed him that he has the right to be heard.
3. A periodic summary reports for the Compliance Committee. This document is prepared before every Compliance Committee meeting. It sums up investigations, violations established and the implementation of corrective actions and disciplinary measures. This periodic report is based on violations reported to the Compliance Officer and Progress reports received by the Compliance officer from his/her nominated delegates and/or the management in the locations concerned. (Appendix D)
4. A record of decision taken by the Compliance Committee members. If a violation has been established, corrective and disciplinary measures will be implemented. These measures may include a reprimand, demotion, suspension or dismissal. (Appendix D)

II. Employee Recruitment, Commitment and Training

A) Recruitment

QIMA informs all prospective employees of the Compliance Programme prior to hiring. Each QIMA employee is provided with a copy of the Compliance Programme.

During their compliance training course, employees are mandatory to pass the course stating that the following Compliance Code has been received, read and understood. A training course record is kept and tracked in the employee E-learning training course record.

All QIMA employees have the right and the opportunity to provide input on the development of the following programme. Employees will be made aware of this during the compliance training.

Adhering to the guidelines set forth by the Compliance Programme, even if the outcome is a loss of business, will not result in QIMA's employees being demoted, punished or any other consequences.

Each Senior Manager is required to sign an annual declaration that the Compliance Programme has been implemented in his/her area of responsibility. (Appendix E)

B) Training

All QIMA employees are required to complete a Compliance Training Course.

QIMA's Compliance Training Course will be administered through E-Learning. All QIMA's employees have E-Learning accounts and have access to the live Compliance Training Course.

A Compliance Training Course record is available through the E-Learning system, which contains the new employee's evaluation score and their acknowledgment of the following Compliance Code. The Compliance record is in the possession of the Compliance Officer.

The Compliance Training Course will be based on the latest available version of "TIC Council Compliance Training Principles".

C) Employee Rights, Commitments and Sanctions

QIMA ensures that each of its employees has an ongoing understanding of the Compliance Programme. The QIMA system keeps records of its inspectors, integrity suspicions and integrity investigations, which can only be accessed by authorized employees.

QIMA employees wishing to gather further information regarding the Compliance Programme, be it questions or concerns, will need to contact the Compliance Officer. QIMA create training course for "Help lines" where employees may obtain guidance on any question or matter of concern relating to the implementation or interpretation of the Programme. At the employee's request, any such question will be dealt with confidentially and the anonymity of the employee will be protected to the extent reasonably practicable.

QIMA employees are required to report details of violations or suspected violations to our Compliance Officer, to their superior, to a member of senior management or to an internal auditor.

QIMA employees have been reminded of this right:

- During their hiring process
- During their Compliance Programme training session

When exercising this right, QIMA employees are fully protected against any form of reprisal unless he/she has acted maliciously or in bad faith. The QIMA Compliance Officer guarantees this right. All employees facing any form of reprisal should refer it to QIMA Compliance Officer.

QIMA Compliance Officer guarantees employee's anonymity; he/she is in charge of internal claims and will anonymously manage it.

QIMA employees allegedly in violation of the following Programme have the right to be heard during the investigation process. All interviews and alleged professions from the perpetrator will be filed by the Compliance Officer.

QIMA employees must report any solicitation or offer of an improper payment or advantage coming to their knowledge.

By not reporting such situations, the QIMA employee infringes on QIMA's core values and exposes him/herself to an internal investigation.

III. QIMA's Control System

A) Business Relationships

Prior to initiating a new business relationship, QIMA will require information about the business partner and run an investigation. These business partners include intermediaries, joint ventures, agents, subcontractors and franchisees.

QIMA requires the following information from business partners:

- Business License
- Capital owner information
- Due diligence report
- Commitment to comply with QIMA's compliance code and allow QIMA to verify this periodically

QIMA keeps records of all accounting documents in a general ledger, which include all payments made by any of its operations and intermediary wages. This is annually prepared as a consolidated management statement.

B) Complaints and Disciplinary Procedures

If QIMA decides to lodge a complaint concerning alleged non-compliance with TIC Compliance Code by other Members, it will be lodged with TIC Council in accordance with the TIC Council Complaints Handling Procedures.

QIMA must refrain from submitting such complaints to other parties unless it is necessary to do so to protect the reputation.

C) Accounting and book keeping

The QIMA accounting team maintains accurate books and records of all financial transactions and documents. Off-the-books accounts are prohibited. QIMA accounts are certified yearly by 3rd party sources.

D) Security Measures

QIMA protects any information in regard to clients, their orders and their products. Access rights to this information are strictly personal, with a requirement that passwords be changed every three months. Additionally, QIMA servers are secured using several different types of security services to safeguard that only authorized personnel will have access to it.

E) External Communications

QIMA has made public its Compliance Principles and provides facilities to receive inquiries, complaints or feedback from interested parties.

The QIMA Compliance Code is available at the following address:

The following email address can be found on our website, on compliance@QIMA.com. <http://www.QIMA.com/accreditations>. Next to TIC logo, click on the following button: “Ask us about our Compliance Code and send us inquiries, complaints or feedback.”

F) Health and Safety

QIMA will record and investigate all reported Health & Safety incidents and undertake corrective measures where appropriate.

G) Compliance summary report

The QIMA Compliance Officer should prepare on an annual basis, a summary report covering statistics or confirmations to show compliance with the QIMA’s procedures and policies for the following areas:

- a) Violations - number of violations / suspected violations reported; number of violations substantiated; and confirmation that remedial actions have been determined and action undertaken / being undertaken for each substantiated violation / non-compliance.
- b) New or renewed intermediaries, joint ventures partners and franchisees
 - i. number of new or renewed intermediaries, joint ventures partners and franchisees in the financial year;
 - ii. confirmation that each has gone through the QIMA's due diligence procedures as required;
 - iii. confirmation that an appropriate contract / terms of business has been put in place with each.
- c) Expenses - confirmation the expenses are in line with the QIMA’s Compliance Programme and related policies for:
 - Political contributions
 - Charitable contributions and sponsorships
 - Expenditures relating to gifts, hospitality and expenses
 - Intermediaries' remuneration
- d) Health & Safety - number of Health & Safety incidents reported; and confirmation that remedial actions have been determined and action undertaken / being undertaken for each incident.

IV. Verification

A) Management Declaration

QIMA require its Senior Managers throughout its organisation to prepare and sign, on an annual basis, a Compliance Declaration (Appendix E) which is based on the template provided by TIC.

These Compliance Declarations will be sent to the Compliance Officer who should submit an annual summary report to the Compliance Committee.

B) Internal Audit

Verification that Compliance Programme has been implemented within QIMA is included as part of QIMA internal audit plan, which is under the responsibility of QIMA nominated Internal auditors (compliance officer and QA team).

It includes verifying that Management Declarations have been completed, and reflect the Programme and, in respect of those locations selected for site audits, correctly reflect the actual situation. Such site audits should review the processes in place and include assessment, on a sampling basis, to ensure the effective application and implementation of the Programme.

The TIC **Guidance Check List for Members' Internal Compliance Audits** is to be used for reference.

The compliance findings resulting from such audits will be reported to the Compliance Officer who should submit a summary report to the Compliance Committee. The Compliance Officer and/or Compliance Committee should take follow-up actions where appropriate.

C) External Examination

1. QIMA will appoint an independent external audit firm at least annually to verify the effectiveness of the implementation of the Programme.
2. QIMA independent external audit firm appointed to carry out this verification should normally be the firm engaged for the audit of QIMA (consolidated) financial statements (which should be a reputable organisation that is a member of a recognised national professional accountancy organisation).
3. Prior to the appointment of the external audit firm, or if any subsequent proposed changes thereof, QIMA will submit details to the Director General for confirmation of compliance with TIC Council requirements.
4. QIMA will carry out the TIC Council Compliance Code by following:
 - 4.1 Submit mandatory documents for verification to TIC Council which were minutely listed in Appendix B Detailed documents for evidence to be submitted.

When submitting the documents, QIMA will self-assess whether the evidence being submitted meets all the evidence requirements. QIMA will explain the reasons for any deviations to the evidence requirements.

Unless otherwise stated, documents are required to be re-submitted only if they have been updated. All documents will be reviewed and updated at least every three years or whenever there is an updated version of the Compliance Code and/or guidelines issued by TIC Council.

4.2 Request audit firm to carry out agreed upon procedures

Annually, QIMA will require an independent audit firm to carry out agreed upon procedures for the following areas:

- I) Understanding of compliance code by each new employee
- II) Attendance of Compliance Programme training course(s) by employees
- III) Employee Help Line (or equivalent - e.g. designated email) to raise queries and / or issues relating to the Compliance Programme
- IV) Reviewing and taking actions on enquiries, complaints and feedback from interested parties
- V) Understanding of the confidentiality requirements by each new employee
- VI) Schedules prepared for political contributions; charitable contributions and sponsorships; expenditures relating to gifts, hospitality and expenses; and Intermediaries' remuneration
- VII) Monitoring of annual compliance declaration submissions by Senior Managers

5. QIMA require the external audit firm to issue a Report showing the results of the agreed upon procedures using the TIC template contained in Annex C of Guidelines to TIC Council Compliance Code. QIMA is required to send a copy of its external audit firm's Report to the TIC Council within 6 months of the end of QIMA's financial year.

V. Appendix List

Appendix A: Compliance Committee Appointment Letter

Appendix B: Detailed documents to be submitted as evidence

Appendix C: Compliance Officer Appointment Letter

Appendix D: Periodic Summary Report

Appendix E: Senior Manager's Declaration

Appendix A

Compliance Committee Appointment Letter

In Hong Kong, on the _____ [DD MM YY],

Dear _____,

As the _____ of QIMA you have been nominated as a member of QIMA Compliance Committee.

As a member of QIMA Committee you will:

- review the progress of our Compliance Programme.
- provide policy guidance.

QIMA Compliance Committee is made up of QIMA Chief Executive Officer, QIMA Chief Operations Officer, QIMA Global Operations Director and QIMA Human Resources Director, Group Legal Counsel, Sustainability Solutions Director, and QIMA Compliance Manager.

QIMA Compliance Committee will gather annually, or at any time in case of an unusual situation to discuss the progress of the Compliance Programme and provide policy guidance. Place and time of the meeting will further be noticed to you.

Signature:

Appendix B

Detailed documents to be submitted as evidence

Documents to be submitted	Detailed requirements for evidence to be submitted
1) QIMA Compliance Programme as well as policies in relation to each principle (if separate)	<p>The programme should cover the compliance code principles:</p> <ul style="list-style-type: none"> - Integrity - Conflicts of interest - Confidentiality and Data Protection - Anti-bribery - Fair business conduct - Fair labour - Health & Safety <p>The programme and policies require to be in line with the details provided in the 'Application of Compliance principles' in the Compliance Code guidelines.</p> <p>The programme should include:</p> <ul style="list-style-type: none"> - reference to the Help Line. - provisions for protection of confidentiality for reporting violations. - a provision where employees can report known or suspected violations to the Compliance Officer, the employee's superior, a member of senior management, or an internal auditor. - requirement for employees to report any solicitation of, or offer of, an improper payment or advantage coming to their attention. - provision that it be made clear that employees will not suffer demotion, penalty or any other adverse consequences arising from strict implementation of the Programme even if it may result in a loss of business.
2) The Terms of Reference for the Compliance Committee (or equivalent) including the specification that the Compliance Committee (or equivalent) is responsible for overseeing the Compliance Programme	<p>The Terms of Reference should specify that the Committee is responsible for overseeing the Compliance Programme.</p> <p>The Terms of Reference should specify the frequency of the Compliance Committee meetings. The Compliance Committee should meet regularly (at least on an annual basis).</p>
3) List of members of the Compliance Committee (including job title)	<p>There should be at least 3 members in the Compliance Committee.</p> <p>The members of the Committee should include:</p> <ul style="list-style-type: none"> - CEO - COO - Global Operations Director (Compliance Officer) - HR Director
4) Compliance Programme training course material	<p>The material should include sections on:</p> <ul style="list-style-type: none"> - Integrity - Conflicts of interest - Confidentiality and data protection - Anti-bribery - Fair business conduct - Fair labour - Health & Safety

	Any training relevant to the financial year should be submitted.
5) Material helping the awareness of the Employee Help Line (or equivalent - e.g. designated email)	The material should explain: <ul style="list-style-type: none"> - that employee can obtain guidance on any question or matter of concern relating to the implementation or interpretation of the Compliance Programme. - at the employee's request, any such question should be dealt with confidentially and the anonymity of the employee should be protected to the extent reasonably practicable.
6) Material encouraging employees to report details of violations or suspected violations and to whom they can report	The material should explain that the: <ul style="list-style-type: none"> - employee is fully protected against any form of reprisal unless he/she acted maliciously or in bad faith. - employee is required to report any solicitation for, or offer of, an improper payment or advantage coming to their knowledge. May be the same as submission 5.
7) Screen print of QIMA website where: <ul style="list-style-type: none"> - the Compliance Principles are explained. - an interested party can make inquiries, complaints or feedback. 	N/A
8) Documented procedure for the handling of investigations and sanctions	The procedures should include requirements for: <ol style="list-style-type: none"> (a) the maintenance of records of all reported violations and subsequent actions taken; (b) the alleged perpetrator of such violation to have the right to be heard; (c) the QIMA management or Compliance Committee to decide on the appropriate corrective and disciplinary measures to be implemented if a violation has been established. These measures may include a reprimand, demotion, suspension or dismissal; and (d) the Compliance Officer to receive progress reports from his/her nominated delegates and/or the management in the locations concerned and prepare periodic summary reports for the Compliance Committee on investigations, violations established and the implementation of corrective actions and disciplinary measures.
9) Policies relating to confidential business information (information security policy, confidentiality policy)	The policy should cover the need for the business to implement adequate security measures to ensure that access is restricted to authorised personnel only and that documents/data are stored in designated secure areas and disposed of in a secure manner.
10) Procedures for health & safety incident reporting and investigations	The procedures should: <ul style="list-style-type: none"> - define what a health & safety incident is. - explain how the employee can report health & safety incidents. - encourage employees to report health & safety incidents. - explain how health & safety incidents will be investigated and remedial actions will be determined.
11) Procedures for due diligence for initiating or renewing the relationships with intermediaries, joint venture partners and franchisees	For intermediaries, joint venture partners and franchisees, QIMA requires to have a written procedure in terms of what due diligence steps they require to carry out and what approval is required for initiating or renewing the intermediary, joint venture partner or

	franchisee.
12) Procedure for contracting with intermediaries, joint venture partners and franchisees and related template(s) of contract / terms & conditions with a new / re-newed intermediary, joint venture partner or franchisee	<p>The contract / terms of business should include:</p> <ul style="list-style-type: none"> - A requirement that the Business Partner complies with the Compliance Programme - A provision allowing QIMA to verify the Business Partner's compliance with the Compliance Programme. <p>For intermediary, joint venture partner and franchisee, QIMA requires to have written procedures in terms of what contracts / terms of business requires to be put in place covering the intermediary, joint venture partner or franchisee's acknowledgement of compliance with QIMA compliance programme.</p> <p>Where QIMA does not have a standard template, QIMA should submit examples of contracts which includes above.</p>
13) Template of the annual management declaration	Compliance declaration should include the attributes in Annex A including locations and/or activities covered by the declaration as well as declaration of implementation of the Compliance Programme
14) Scope of Internal Audit plan that includes the review of the implementation of the Compliance Code	The Scope of the Internal Audit plan should cover the QIMA's organisation.

<p>15) Annual summary reports prepared by the Compliance Officer covering statistics or confirmations to show compliance with QIMA procedures and policies and policies</p>	<p>On an annual basis (in line with financial year-end), QIMA should prepare an annual summary reports detailing:</p> <p>1) Violations:</p> <ul style="list-style-type: none"> - Number of violations / suspected violations reported - Number of violations substantiated - Confirmation that remedial actions have been determined and action undertaken / being undertaken for each substantiated violation / non-compliance. <p>(The above statistics are required to cover those violations / suspected violations reported through Help Line as well as found during Internal Audits.)</p> <p>2) For new or re-newed intermediaries, joint venture partners and franchisees:</p> <ul style="list-style-type: none"> - Number of new or re-newed intermediaries, joint venture partners and franchisees in the financial year. - Confirmation that each has gone through QIMA’s due diligence procedures as required. - Confirmation that an appropriate contract / terms of business has been put in place with each. <p>3) Confirmation the expenses are in line with the QIMA’s Compliance Programme and related policies for:</p> <ul style="list-style-type: none"> - Political contributions. - Charitable contributions and sponsorships. - Expenditures relating to gifts, hospitality and expenses. - Intermediaries' remuneration. <p>4) Health & Safety:</p> <ul style="list-style-type: none"> - Number of health & safety incidents reported - Confirmation that remedial actions have been determined and action undertaken / being undertaken for each incident.
<p>16) Annual report of the results of the agreed upon procedures</p>	<p>N/A</p>

Appendix C

Compliance Officer Appointment Letter

In Hong Kong, on the _____ [DD MM YY],

Dear _____,

As the _____ of QIMA Compliance Committee you have been nominated as our Compliance Officer.

As a Compliance Officer you have responsibility and authority under the Board for the coordination of the implementation of the Compliance Programme throughout QIMA's organisation.

To implement QIMA Compliance Programme you may nominate delegates to perform some or all of his/her functions within specified parts of the organisation.

As the QIMA Compliance officer you should initiate an investigation if any violation of the Programme reported to you or your coming to knowledge.

To do so, you should maintain a documented procedure for the handling of investigations and sanctions. This documented procedure should include:

- a) The maintenance of records of all reported violations and subsequent actions taken;
- b) The alleged perpetrator of such violation to have the right to be heard;
- c) The Member's management or Compliance Committee to decide on the appropriate corrective and disciplinary measures to be implemented if a violation has been established. These measures may include a reprimand, demotion, suspension or dismissal;
- d) The Compliance Officer to receive progress reports from his/her nominated delegates and/or the management in the locations concerned and prepare periodic summary reports for the Compliance Committee on investigations, violations established and the implementation of corrective actions and disciplinary measures. This summary reports will be shown to the Compliance Committee, held annually.

Signature:

Appendix D

Periodic Summary Report

Objective: summing up investigations, violations established and the implementation of corrective actions and disciplinary measures.

Date of the next Compliance Committee meeting:

Violation established:

- A) Description, name of the perpetrator, annex documents
- B) Disciplinary measures taken
- C) Corrective actions taken and progress reports received

Violation established:

- A) Description, name of the perpetrator, annex documents
- B) Disciplinary measures taken
- C) Corrective actions taken and progress reports received

Violation established:

- A) Description, name of the perpetrator, annex documents
- B) Disciplinary measures taken
- C) Corrective actions taken and progress reports received

Appendix E

Senior Manager's Declaration

QIMA's Compliance Programme Management Declaration for the year ending [year]

Name of Manager:

Job Title:

Locations and/or activities covered by this Declaration:

I(name of Manager) do hereby declare that in implementation of QIMA's Compliance Programme for the year ending [year] in each of the locations and/or activities, as listed above, falling under my area of responsibility :

1. To the best of my knowledge I, and the members of staff reporting to me, have complied in all respects with the Compliance Programme;
2. I have verified that the Compliance Programme has been distributed to each Employee who had not previously received them;
3. I have fully and completely reported to the Compliance Officer any violation or suspected violation of the Programme, including any solicitation or offer of any improper payment or advantage, which has come to my knowledge;
4. I have fully and completely implemented all corrective and disciplinary actions required by the Compliance Committee in respect of any violation of the Programme.

Place:

Date:

Signature: