

TOM CHESS T GROUP OF COMPANIES LTD

Employee Handbook



2021

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STATEMENT OF EMPLOYMENT RELATIONSHIP

PLEASE READ CAREFULLY

Every employee of TOM CHESS T GROUP OF COMPANIES LTD is an Employee-at-Will. Employment may be terminated with or without cause and with or without notice at any time by you or by the Company. This is true no matter what may be stated elsewhere in this handbook or in any other writing given to you by the Company. Nothing in this Handbook or in any document or statement shall limit the right to terminate Employment at- Will. No manager, supervisor or employee of the Company other than the Executive Group Chairman/CEO has any authority to enter into an agreement for employment for any specified period of time or to make an agreement for employment other than at-will. Any such agreement must be in writing and signed by the Executive Group Chairman/CEO.

DISCLAIMER

This Employee Handbook sets forth the terms and conditions of employment of all full-time and part-time employees. This Handbook contains no promises of any kind and TOM CHESS T GROUP OF COMPANIES LTD can, on its own, change or discontinue any policy in this Handbook or other writing, or change any working condition with or without having to consult anyone and without anyone's agreement.

This Handbook contains the employment policies and practices of the Company in effect at the time of publication. All previously issued handbooks and any inconsistent policy statements or memoranda are hereby superseded and should be considered obsolete and be discarded.

Any written changes to this Handbook will be distributed via e-mail or written notification and posted to the intranet to all employees so that employees will be aware of the new policies or procedures. No oral statements or representations can in any way change or alter the provisions of this Handbook.

Nothing in this Handbook should be read to create any contractual obligation between you and the Company. This handbook contains general policies and any state laws to the contrary will control. This Handbook is for information purposes only.



THOMPSON O.S. DOUGLAS
Executive Group Chairman/CEO

...building perfection

INTRODUCTORY POLICIES

TOM CHESS T GROUP OF COMPANIES LTD. - Whether you have just joined TOM CHESS T GROUP OF COMPANIES LTD or you have been with the Company for a while, we hope you will find your employment with TOM CHESS T GROUP OF COMPANIES LTD to be both rewarding and challenging.

The quality and motivation of our employees is the key to our success. In turn, we expect employees to contribute to the success of the Company.

1. EMPLOYEE HANDBOOK

WHAT IS IT?

The Employee Handbook provides general information about TOM CHESS T GROUP OF COMPANIES LTD and the policies and procedures of the Company. As a guideline, it is not intended that the Handbook cover every situation. The Company may also decide to make changes to the content of the Handbook at any time it feels it is necessary and appropriate.

This Handbook has been written in compliance with existing federal legislation. There may be situations where various state and/or local statutes provide benefits beyond what is provided by the applicable federal legislation. Those state and/or local statutes are not specifically included and referenced in this Handbook, but the Company will comply with them if they expand on benefits provided by federal legislation. The interpretation of the affected section of the Handbook will be consistent with those state and/or local statutes.

WHAT IS IT NOT?

The Employee Handbook does **not** create a contract of employment. Only the Executive Group Chairman/CEO of TOM CHESS T GROUP OF COMPANIES LTD has the authority to enter into any agreement with any individual, for employment for any specified period of time. Any such agreement with the Executive Group Chairman/CEO must be an individual agreement in writing and signed by both the Executive Group Chairman/CEO and the individual. No one has the authority to make any oral statements of any kind, which are legally binding on TOM CHESS T GROUP OF COMPANIES LTD.

WHO IS RESPONSIBLE FOR ISSUING IT?

The Human Resources Department with the approval of the Executive Group Chairman/CEO issues and updates the Employee Handbook. This Employee Handbook supersedes any previously issued handbooks or similar summaries.

WHO DOES IT APPLY TO?

Unless otherwise stated, the provisions of this handbook apply to all full-time and part-time employees.

WHO DO I SEE IF I HAVE QUESTIONS?

You should direct any questions to your immediate supervisor or the Corporate Human Resources Department.

1.1 COMPANY BACKGROUND

TOM CHESS T GROUP OF COMPANIES LTD is a contemporary wholly owned Nigerian Company registered by the Corporate Affairs Commission. The company is into Engineering & Architectural design and construction of homes, hotels, Petrol Filling Stations, LPG Refilling Plants etc. In addition to that we also offer a range of other services which include: Sludge and Tank Cleaning, Oil & Gas Haulage and Trucking Services, Information and Communication Technology (ICT) Services and Business Registration Services.

The Company is committed to highest standards of corporate conduct towards its various stakeholders and the environment in which it operates. Towards this, the Company recognizes its responsibility to ensure safety and protection of health of its employees, contractors, visitors and neighborhood in all its operating sites, which include manufacturing, sales and distribution, research laboratories and offices.

This Policy document defines the vision, mission, aim, scope of application and required actions of the policy as well as the responsibility for its execution.

1.2 EMPLOYMENT AT WILL

As previously stated in the Statement of Employment Relationship on the first page of the Handbook, every employee of TOM CHESS T GROUP OF COMPANIES LTD is an Employee-at-Will. This section reinforces the Statement of Employment Relationship and emphasizes the fact that there is no contractual arrangement that exists between the Company and any employee. Employment-at-Will means that individual employees and the Company may enter into, or end, an employment relationship at any time and for any reason.

1.3 INTEGRATION CLAUSE AND THE RIGHT TO REVISE

This Employee Handbook sets forth the terms and conditions of employment of all full-time and part-time employees. The Handbook contains the employment policies and practices of the Company in effect at the time of publication. All previously issued handbooks and any inconsistent policy statements or memoranda are hereby superseded and should be considered obsolete and be discarded.

The Company reserves the right to unilaterally revise, modify, delete or add to any and all policies, procedures, work rules or benefits stated in this Handbook or in any other document at any time without any involvement or input from any other source.

Any written changes to this Handbook will be distributed via E-mail or written notification and posted to the intranet to all employees so that employees will be aware of the new policies or procedures. No oral statements or representations may in any way change or alter the provisions of this Handbook.

Nothing in this Handbook should be read to create any contractual obligation between you and the Company. This Handbook is for informational purposes only.

1.4 EQUAL EMPLOYMENT OPPORTUNITY

Since its inception, it has been a fundamental principal at TOM CHESS T GROUP OF COMPANIES LTD to provide equal opportunity for employment to all applicants and equal treatment to all applicants and equal treatment to all employees.

Employment is based upon personal capabilities and qualifications without discrimination because of gender identity, gender expression, race, sex, color, religion, national origin, ancestry, age, physical disability, mental disability, medical condition, veteran status, family responsibilities, marital status, family care, medical leave status, citizenship status, creed, genetic information or any other characteristic protected by law.

This policy of Equal Employment Opportunity applies to all policies and procedures relating to recruitment, hiring, compensation, benefits, training and apprenticeship, promotion, upgrading, demotion, downgrading, transfer, lay-off and termination and all other terms and conditions of employment.

Furthermore, the philosophy and goal at TOM CHESS T GROUP OF COMPANIES LTD of attaining continued growth requires that the employment policies of the Company consistently and exclusively emphasize qualification, skill, ability, and the best possible development and management of our employees.

To this end, TOM CHESS T GROUP OF COMPANIES LTD reaffirms its continuing policy to:

- Recruit, hire, and promote all job classifications without regard to gender identity, gender expression, race, sex, color, religion, national origin, ancestry, age, physical disability, mental disability, medical condition, veteran status, family responsibilities, marital status, family care, medical leave status, citizenship status, creed, genetic information or any other characteristic protected by law.
- Base decisions on employment so as to further the principle of equal employment opportunity.
- Ensure that employment and promotion decisions are in accord with principles of equal employment opportunity by imposing only valid requirements for employment and promotional opportunities.
- Ensure that all other personnel actions and policies such as compensation, benefits, transfers, Company-sponsored training, tuition assistance, leaves of absence, and educational and social events are administered without regard to gender identity, gender expression, race, sex, color, religion, national origin, ancestry, age, physical disability, mental disability, medical condition, veteran status, family responsibilities, marital status, family care, medical leave status, citizenship status, creed, genetic information or any other characteristic protected by law.

As opportunities for transfers, advancement or promotions occur, including promotions into and within management, periodic reviews and analyses of personnel records are made to ensure that all minority and female employees continue to receive equal consideration and only valid requirements are imposed for these opportunities.

1.5 AFFIRMATIVE ACTION

It also continues to be appropriate for TOM CHESS T GROUP OF COMPANIES LTD to vigorously support its Affirmative Action Program in order to continue to assure that our employee population is truly representative of the best talents and abilities of the human resources available to us. The Human Resources Manager has overall responsibility for the implementation of our Affirmative Action Program.

Your cooperation and support in effectuating TOM CHESS T GROUP OF COMPANIES LTD's Affirmative Action Program is essential in assuring equal employment opportunities throughout the Company.

1.6 EQUAL EMPLOYMENT OPPORTUNITY FOR QUALIFIED INDIVIDUALS WITH DISABILITIES AND QUALIFIED PROTECTED VETERANS

It is the policy of TOM CHESS T GROUP OF COMPANIES LTD not to discriminate against any employee or applicant for employment because he or she is a qualified individual with a disability, a disabled veteran, a newly separated veteran, a campaign veteran, or an armed forces service medal veteran (i.e., qualified protected veterans). It is also the policy of TOM CHESS T GROUP OF COMPANIES LTD to take affirmative action to employ and to advance in employment, all persons regardless of their status as qualified individuals with disabilities or qualified protected veterans, and to base all employment decisions only on valid job requirements.

This policy shall apply to all employment actions, including but not limited to recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation and selection for training, including apprenticeship, at all levels of employment.

Employees of and applicants to TOM CHESS T GROUP OF COMPANIES LTD will not be subject to harassment, intimidation, threats, coercion, or discrimination because they have engaged or may engage in filing a complaint, assisting in a review, investigation, or hearing or have otherwise sought to obtain their legal rights related to any Federal, State, or local law regarding EEO for qualified individuals with disabilities or qualified protected veterans.

It is TOM CHESS T GROUP OF COMPANIES LTD's policy that we will not discriminate against qualified individuals with disabilities with regard to any aspect of their employment. If you are currently disabled or become disabled during your employment, you are invited to contact the Human Resource Department to discuss reasonable accommodations that may enable you to perform the essential functions of your job.

1.7 NON-DISCRIMINATION

If you believe you have been subjected to any form of unlawful discrimination, notify your supervisor or the Human Resources Department. Your complaint should be specific and should include the names of the individuals involved and the names of any witnesses. The Company will immediately undertake an effective, thorough and objective investigation and attempt to resolve the situation. If the Company determines that unlawful discrimination has occurred, effective remedial action will be taken commensurate with the severity of the offense. Appropriate action also will be taken to deter any future discrimination. The Company will not retaliate against you for filing a complaint and will not knowingly permit retaliation by management employees or your coworkers.

The Human Resources Department has overall responsibility for this policy and maintains reporting and monitoring procedures. Employees' questions or concerns should be referred to the Human Resources Department.

Appropriate disciplinary action may be taken against any employee willfully violating this policy.

1.8 ANTI-HARASSMENT AND PROFESSIONAL BEHAVIOR POLICY

TOM CHESS T GROUP OF COMPANIES LTD is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Each employee will be dealt with fairly and honestly. Therefore, TOM CHESS T GROUP OF COMPANIES LTD expects that all relationships among persons will be business-like and free of bias, prejudice and harassment. This applies not only to the workplace, but to any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

It is the policy of TOM CHESS T GROUP OF COMPANIES LTD to prohibit harassment in the workplace based on gender identity, gender expression, race, sex, color, religion, national origin, ancestry, age, physical disability, mental disability, medical condition, veteran status, family responsibilities, marital status, family care, medical leave status, citizenship status, creed, genetic information or any other characteristic protected by law. Sexual harassment is a specific form of harassment that is illegal under federal, state, and local laws. Sexual harassment prohibits harassment based on gender, pregnancy and childbirth, and related medical conditions.

Sexual harassment and harassment based on protected class membership is illegal and is a form of Misconduct that undermines the integrity of the employment relationship and negatively impacts upon the morale and productivity of our employees

Sexual harassment or harassment of any employee on the basis of his or her membership in a protected class is **strictly prohibited**.

Harassment is defined as verbal, physical, or visual conduct that creates an intimidating, offensive, or hostile working environment. It is a conduct that interferes with work performance, or otherwise adversely affects an individual's employment opportunities. Harassing conduct includes, but is not limited to: epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group and that is circulated or displayed in the workplace.

For the purposes of our policy, sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature.

Sexual Advances or Favors. It is a violation of this policy for any employee to threaten or insinuate, expressly or implicitly, that a subordinate is required to submit to sexual advances or to provide sexual favors as a condition of employment, continued employment, or any term, condition or benefit of

employment, or that a subordinate's refusal to submit to sexual advances or to provide sexual favors will affect adversely the subordinate's employment, continued employment, or any term, condition or benefit of employment. Sometimes social relationships may develop at work. However, no employee ever should feel compelled to date, become romantically involved with, or continue such a relationship with another employee. Any employee who feels any unwelcome pressure from another employee in this way is urged to use the complaint procedure below.

Hostile Environment Sexual Harassment

It is a violation of this policy for any employee to engage in unwelcome sexual conduct which has the purpose or effect of interfering unreasonably with another employee's work performance or of creating an intimidating, hostile or offensive working environment.

Examples of prohibited conduct may include but are not limited to: physical assaults or other physical conduct of a sexual nature, including unwanted touching; unwanted sexual advances, propositions, or other sexual comments; sexual displays or publications anywhere in the workplace; taking retaliatory action against an employee for discussing or making a sexual harassing complaint.

Examples of unwelcome behavior may be something said, something in writing (print or E-mail), something acted out; the presence of something sexually demeaning; touching; sexual remarks, innuendoes, and jokes; graphic cartoons or graffiti of a sexual nature; persistence in asking employees for dates; lewd or suggestive comments regarding personal life or appearance; cornering or blocking a person's pathway; suggestive gestures and language; obscene language; and originating, forwarding or accessing electronic communications or data of a sexual nature via E-mail or the Internet.

All Employees. This policy applies to all TOM CHESS T GROUP OF COMPANIES LTD employees, including temporary employees, and full-time and part-time employees and prohibits unlawful harassment by any employee towards another.

Non-Company Employees

These prohibitions against harassment also apply to non-employees. Non- employees include third parties, such as vendors, clients, sub-consultants, contractors, independent consultants, external consultants and the general public who have contact with TOM CHESS T GROUP OF COMPANIES LTD employees

When non-employees are present at our workplace or interact with our employees (including through electronic communications), we expect them to apply the same standards of conduct that we expect of our employees. If any employee feels harassed, sexually or based on membership in a protected class, he or she should use the complaint procedure below. Conversely, we expect our employees to treat non-employees with the same courtesy and respect as coworkers. Harassment of non-employees by Company employees also is strictly prohibited.

Reporting and Investigation

We encourage the reporting of all perceived incidents of discrimination or harassment, regardless of the offender's identity or position, and prohibit retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports. It is our policy to investigate any and all such reports. Individuals who believe they are being subjected to harassing conduct should promptly advise the offender that his or her behavior is unwelcome and request that it be discontinued. Often this action alone will resolve the problem. If the problem is not resolved the person may then want to pursue the matter through the internal complaint procedure. We recognize, however, that some individuals may not be comfortable dealing with a situation directly with the offender, and instead may wish to begin with the internal complaint procedure.

An employee who feels he or she has been harassed in violation of this policy should immediately report that to their immediate manager, or to the Human Resources Department. Any employee not comfortable reporting to the Human Resources Department may directly contact the Corporate Legal Department.

The Human Resources Department and/or Corporate Legal Department will investigate all sexual harassment complaints. This may include, but is not limited to, interviewing the complaining party, supervisors and any other personnel, as required, to obtain sufficient, factual information upon which to make a determination. Confidentiality will be maintained throughout any investigation process to the extent consistent with adequate investigation and appropriate corrective action.

At the conclusion of the investigation, the Human Resources Department will report its findings, along with recommendations to the appropriate management.

The complaining party will be advised by the Human Resources Department as to the final disposition of the complaint. Every effort will be made to resolve each complaint within 30 days after it is received.

If a person who has made a complaint does not agree with its resolution, that person may appeal to TOM CHESS T GROUP OF COMPANIES LTD's Executive Group Chairman/CEO.

False and malicious complaints of harassment, discrimination or retaliation as opposed to complaints which, even if erroneous, are made in good faith, may be the subject of appropriate disciplinary action.

It is not TOM CHESS T GROUP OF COMPANIES LTD's intention to regulate social relationships that are freely entered into by employees. However, it is our affirmative duty to develop and maintain a workplace free of sexual harassment and intimidation. We expect the full cooperation of every employee to achieve this goal.

Non-Retaliation

Coercion, retaliation, intimidation, or harassment directed against any employee who registers a complaint or serves as a witness on behalf of another employee is illegal. If any employee feels that he or she has been retaliated against for making a complaint or participating in the investigation process, it should be reported using the procedures above.

Corrective Measures

Any employee found to have violated this policy may be subject to appropriate discipline, up to and including termination of employment.

Other Forms of Discrimination

This policy also applies to forms of discrimination other than harassment. Any employee who believes that he or she has been discriminated against in any manner based upon his or her membership in a legally protected class (gender identity, race, sex, color, religion, national origin, ancestry, age, physical disability, mental disability, medical condition, veteran status, family responsibilities, marital status, family care, medical leave status, citizenship status, creed, genetic information or any other characteristic protected by law) should follow the complaint procedure described in the provisions above.

If you should have any questions about the TOM CHESS T GROUP OF COMPANIES LTD policy against sexual harassment and/or the procedure for filing complaints, please contact the Human Resources Manager

1.9 ENVIRONMENTAL POLICY

TOM CHESS T GROUP OF COMPANIES LTD is committed to providing quality service in a manner that ensures a safe and healthy workplace and/or worksites for our employees and minimizes our potential impact on the environment. TOM CHESS T GROUP OF COMPANIES LTD will operate in compliance with all relevant environmental regulation and we will strive to use pollution prevention and integrate the consideration of environmental concerns and impacts into all of our decision making and activities.

TOM CHESS T GROUP OF COMPANIES LTD will:

- promote environmental awareness among our employees and encourage them to work in an environmentally responsible manner,
- reduce waste through re-use and recycling and by purchasing recycled, recyclable or re-furnished products and materials where these alternatives are available, economical and suitable,
- promote efficient use of materials and resources throughout our facilities including water, electricity, raw materials and other resources, particularly those that are non-renewable,
- avoid unnecessary use of hazardous materials and products, seek substitutions when feasible, and take all reasonable steps to protect human health and the environment when such materials must be used, stored and disposed of,
- purchase and use environmentally responsible products where feasible,
- where required by legislation or where significant health, safety or environmental hazards exist, develop and maintain appropriate emergency and spill response programs,
- Strive to continually improve our environmental performance and minimize the social impact and damage of activities by periodically reviewing our environmental policy in light of our current and planned future activities.

1.10 PAY TRANSPARENCY

TOM CHESS T GROUP OF COMPANIES LTD will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information.

WORKPLACE STANDARD OF CONDUCT

2. CODE OF CONDUCT

TOM CHESS T GROUP OF COMPANIES LTD employees are expected to conduct themselves at all times with the highest ethical standards. The reputation and integrity of TOM CHESS T GROUP OF COMPANIES LTD are directly related to the reputation and integrity of TOM CHESS T GROUP OF COMPANIES LTD's employees. No lapses in an employee's integrity or ethical standards will be condoned or tolerated. All employees of TOM CHESS T GROUP OF COMPANIES LTD are expected to adhere to a Code of Conduct in all actions and activities conducted by and for the Company.

THE AUTHORITY TO CONTRACTUALLY BIND TOM CHESS T GROUP OF COMPANIES LTD

Contracts: Only the Executive Group Chairman/CEO of TOM CHESS T GROUP OF COMPANIES LTD has the authority to execute a contract on behalf of TOM CHESS T GROUP OF COMPANIES LTD. No Contract may be executed by anyone unless and until it has been reviewed and approved by TOM CHESS T GROUP OF COMPANIES LTD's legal department. A copy of all contracts must be forwarded to TOM CHESS T GROUP OF COMPANIES LTD's Corporate Legal and Corporate Finance Departments immediately after execution.

Any revision of the following provisions - Anti-Corruption, Limitations of Liability, Indemnification, Insurance, Dispute Resolution, in any standard TOM CHESS T GROUP OF COMPANIES LTD Agreement previously approved for use by the Legal Department requires the approval of the Executive Group Chairman/CEO or the Corporate Legal Department.

Real Estate Leases: All real estate lease transactions must be approved by the Executive Group Chairman/CEO.

Any request for a real estate lease must be submitted to TOM CHESS T GROUP OF COMPANIES LTD's Corporate Legal Department for that territory by confirmed email six months prior to the desired start of the real estate lease or six months prior to termination of the real estate lease agreement.

Following written approval on business justification from TOM CHESS T GROUP OF COMPANIES LTD's CEO, TOM CHESS T GROUP OF COMPANIES LTD's Corporate Legal Department for that territory will commence real estate lease negotiations with the assistance of TOM CHESS T GROUP OF COMPANIES LTD's approved real estate broker. TOM CHESS T GROUP OF COMPANIES LTD's Corporate Legal Department for that territory must review, negotiate and approve any lease terms prior to execution. Once agreement on a new real estate lease or renewal is reached and the Legal Department has approved the terms, it must be submitted to TOM CHESS T GROUP OF COMPANIES LTD's CEO by the Legal Department, at least one month prior to the "Commencement Date" of the agreement for final approval.

Once written confirmation from TOM CHESS T GROUP OF COMPANIES LTD's CEO is received, the agreement may be executed by the CEO or TOM CHESS T GROUP OF COMPANIES LTD Officer provided written authority to execute the lease by the CEO.

Contingency Fees: No employee is authorized to enter into any agreement with a client and/or third party relating to Contingency Fees and/or Conditional Fees without the prior approval of TOM CHESS T GROUP OF COMPANIES LTD's Executive Group Chairman/CEO.

CODE OF CONDUCT

- Employees will be treated fairly and equitably. They will be treated with respect, and will be expected to treat others in the same manner.
- The reputation and integrity of individuals and the Company will not be compromised for any reason; all transactions, both internal and external, will be conducted at the highest ethical level.
- We will act in a manner to protect the safety and security of employees, and to protect corporate and individual assets.
- An orderly and productive work environment is the accepted norm. It is expected that all employees will act in a manner to ensure that it is achieved.
- Employees are expected to always make decisions and take actions that are in the best interests of TOM CHESS T GROUP OF COMPANIES LTD and its business objectives.
- Unacceptable behavior, which disrupts the workplace and is counter to the intent and purpose of the Code of Conduct, will not be tolerated.
- No employee may accept a gift or gratuity from any client, vendor, supplier or other person doing business with the Company as it may give the appearance of influence regarding their business decision, transaction or service, unless specifically approved by the Senior Vice President responsible for your operation.
- Bullying will not be tolerated by any employee.

EXAMPLES OF UNACCEPTABLE BEHAVIOR

The following list is provided as representative of the type of actions that would constitute unacceptable behavior, and may result in disciplinary action, up to and including termination depending on the facts and circumstances of each case and at TOM CHESS T GROUP OF COMPANIES LTD's sole discretion. The list is not intended to be all inclusive, but only to provide examples of the types of behaviors that are counter to the purpose and intent of the Code of Conduct:

- Theft of property from TOM CHESS T GROUP OF COMPANIES LTD or other employees; or from a project site.
- Any harassment, including sexual harassment, of another employee, client, or members of the general public encountered as a representative of the Company.
- Falsification of timekeeping records.
- Violations of security practices (e.g. duplicating keys for office locations)
- Reporting to work in a condition unfit to perform the duties of the job in a safe and productive manner.
- Possession, distribution, sale, or use of alcohol or illegal drugs (including the use, sale, or distribution of medications not in accordance with a valid prescription) in the workplace, while on duty, or while operating employer-owned vehicles or equipment.

- Fighting, threatening, or intimidating other employees, supervisors, clients, or other people contacted as part of the person's job.
- Intentionally misusing or damaging company property (includes equipment, facilities, data, and systems) or the property of another employee.
- Insubordination by refusing to follow a supervisor's instructions.
- Activity that disrupts the workplace and interferes with the productive efforts of others.
- Sleeping on the job.
- Unauthorized operation or use of tools, machinery, equipment, or software.
- Misappropriation or use of TOM CHESS T GROUP OF COMPANIES LTD's funds or assets.
- Disregarding safety rules.
- Excessive absenteeism or unauthorized absence.
- Failure to maintain acceptable performance levels for either the quality or quantity of work assigned.
- Failure to report workplace accidents or injuries.
- Failure to wear specified safety equipment.
- Possession of dangerous or unauthorized materials, such as explosives or firearms, in the workplace. Using any items (such as hammers, screwdrivers, etc.) to threaten other employees or clients.
- Removal of company records, release of unauthorized company information, or making unauthorized copies of company records or information.
- Failure to report to management, within five (5) days any criminal conviction.
- Failure to follow company policies and procedures.

2.1 PUNCTUALITY AND ATTENDANCE

Because TOM CHESS T GROUP OF COMPANIES LTD depends heavily upon its employees, it is important that employees attend work as scheduled. Dependability, attendance, punctuality, and a commitment to do the job right are essential at all times. As such, employees are expected at work on all scheduled work days and during all scheduled work hours and to report to work on time. Moreover, an employee must notify their supervisor as far in advance as possible, but not later than one hour before their scheduled starting time if they expect to be late or absent. This policy applies for each day of their absence. A careful record of absenteeism and lateness is kept by the employee's supervisor and becomes part of the personnel record. To the extent permitted by law, absenteeism and lateness lessen an employee's chances for advancement and may result in dismissal.

An employee who is absent for three (3) consecutive work days and has failed to contact their immediate supervisor may be considered as having voluntarily resigned.

2.2 CONFIDENTIALITY AND NON DISCLOSURE

All TOM CHESS T GROUP OF COMPANIES LTD records and information relating to TOM CHESS T GROUP OF COMPANIES LTD or its clients are confidential and employees must, therefore, treat all matters accordingly. No TOM CHESS T GROUP OF COMPANIES LTD related information, including without limitation, documents, notes, files, records, oral information, computer files or similar materials (except in the ordinary course of performing duties on behalf of TOM CHESS T GROUP OF COMPANIES LTD) may be removed from TOM CHESS T GROUP OF COMPANIES LTD's premises without permission from TOM CHESS T GROUP OF COMPANIES LTD.

Additionally, the contents of TOM CHESS T GROUP OF COMPANIES LTD's records or information otherwise obtained in regard to business may not be disclosed to anyone, except where required for a business purpose. Any confidential information obtained by an individual as a result of their employment with TOM CHESS T GROUP OF COMPANIES LTD is not to be disclosed, purposefully or inadvertently (through casual conversation), to any unauthorized person inside or outside the Company. Employees who are unsure about the confidential nature of specific information must ask their supervisor for clarification.

Employees may be subject to appropriate disciplinary action, up to and including dismissal, for knowingly or unknowingly revealing information of a confidential nature. In addition, individuals may be subject to legal action depending upon the nature of the disclosure, and the resulting implication and potential damages to TOM CHESS T GROUP OF COMPANIES LTD and/or the client. The protection of confidential business information secrets is vital to the interests and the success of TOM CHESS T GROUP OF COMPANIES LTD. Such confidential information includes, but is not limited to, the following examples:

- Client Lists and Information
- Contracts
- Data
- Financial Information and Costs
- Letters and Memos
- Manuals
- Methods
- Processes
- Proposals
- Reports of Studies
- Software
- Techniques
- Trade Secrets

Employees must not discuss internal matters or developments with anyone outside of TOM CHESS T GROUP OF COMPANIES LTD, except as required in the performance of their regular job. All communications to the press or others in the industry or financial community must be through the Executive Group Chairman/CEO, or those individuals specifically designated by TOM CHESS T GROUP OF COMPANIES LTD.

2.3 CONFLICT OF INTEREST AND OUTSIDE EMPLOYMENT

The Company expects our employees to conduct business according to the highest ethical standards of conduct. Employees are expected to devote their best efforts to the interests of the Company. Business dealings that appear to create a conflict between the interests of the Company and an employee are unacceptable.

The Company recognizes the right of employees to engage in activities outside of their employment which are of a private nature and unrelated to our business. However, the employee must disclose any possible conflicts so that the Company may assess and prevent potential conflicts of interest from arising. A potential or actual conflict of interest occurs whenever an employee is in a position to influence a decision that may result in a personal gain for the employee or an immediate family member (e.g., spouse or domestic partner, children, domestic partner children, parents, siblings, etc.) as a result of the Company's business dealings.

Although it is not possible to specify every action that might create a conflict of interest, this policy sets forth the ones which most frequently present problems. If an employee has any question whether an action or proposed course of conduct would create a conflict of interest, he or she should immediately contact the Human Resources Department to obtain advice on the issue. The purpose of this policy is to protect employees and TOM CHESS T GROUP OF COMPANIES LTD from any conflict of interest that might arise.

A violation of this policy may result in immediate and appropriate disciplinary action which may include at TOM CHESS T GROUP OF COMPANIES LTD's discretion immediate termination.

2.4 WHISTLEBLOWER POLICY

A whistleblower as defined by this policy is an employee of TOM CHESS T GROUP OF COMPANIES LTD who reports an activity that he/she reasonably believes to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee should report the activity in one of the following ways: by telephone **0803-3094-590** or report to the Human Resources Manager. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing may be subject to discipline up to and including termination.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. The Company will not retaliate against a Whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and Threats of physical harm

Any whistleblower who believes he/she is being retaliated against must contact the Human Resources Manager immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

All reports of illegal and dishonest activities will be promptly submitted to the Corporate Legal Department who is responsible for investigating and coordinating corrective action.

Employees with any questions regarding this policy should contact the Human Resources Manager.

2.5 DRUG-FREE WORKPLACE POLICY

TOM CHESS T GROUP OF COMPANIES LTD believes that employee safety, welfare, productivity and efficiency are of vital importance to our employees, clients and to the success of our Company. Illegal drug use has an adverse impact on each of us. We believe a drug abuser jeopardizes the health and safety of our employees and is unable to properly perform his / her job. To provide a safe and positive work environment, the Company has established a Drug-Free Workplace Program. In implementing this program the Company will also comply with the contractual requirements of its clients, and the requirements of federal, state, or local laws.

DRUG-FREE AWARENESS PROGRAM

TOM CHESS T GROUP OF COMPANIES LTD will provide a safe environment for its employees, clients, and visitors. In order to accomplish this, the Company will maintain a work place that is free from the effects of drug and alcohol abuse.

The policy will be implemented as follows:

- Employees are prohibited from the use, sale, dispensing, distribution, possession, or manufacture of illegal drugs and narcotics or alcoholic beverages on Company or Client premises (including Company vehicles or vehicles used for Company business), work sites, or while on company time. In addition employees are prohibited from the off-premise use of alcohol and possession, use, or sale of illegal drugs when such activities adversely affect job performance, job safety, or the Company's reputation in the community.
- If state and federal law differ, the Company typically will comply with federal law. For example, some state laws permit the use and possession of marijuana for medical and/or non-medical purposes; however, federal law does not. Unless otherwise required by a specific state law, the Company considers marijuana to be an Illegal Drug for purposes of this policy in all states – even those states that allow for medical and/or non-medical use.
- TOM CHESS T GROUP OF COMPANIES LTD will not hire, unless state or local law provides otherwise, alcoholics or drug abusers whose current use of such substances prevent them from performing their jobs or would constitute a direct threat to the property or safety of others.
- Employees may be subject to disciplinary action, up to and including termination, for violations of this policy.
- Employees who are convicted of any criminal drug violation occurring in the workplace must report such conviction to the Human Resources Department within five (5) days.
- Employees who must use prescribed drugs or narcotics during work, which may limit or interfere with their ability to safely and effectively perform their job should immediately report this fact to the Human Resources Department along with acceptable medical documentation.
- Employees who are experiencing work-related problems resulting from drug, narcotic, or alcohol abuse or dependency may seek counseling help through their healthcare program (whether provided by TOM CHESS T GROUP OF COMPANIES LTD or another organization).

In certain situations clients may require employees working on their projects and/or sites to submit to random or scheduled drug and/or alcohol testing. Employees must comply with those requirements.

PENALTIES

Any employee who violates this policy by manufacturing, distributing, dispensing, using, possessing, or being under the influence of any illegal drug and narcotics or alcoholic beverages while working for TOM CHESS T GROUP OF COMPANIES LTD or while otherwise on Company property, or who fails to report a workplace criminal drug conviction within five (5) days, may be subject to discipline, up to and including termination for cause. Depending upon the circumstances, such employee may be required to satisfactorily participate in a drug abuse or alcohol assistance or rehabilitation programs approved for such purposes by a federal, state, or local health, law enforcement, or other appropriate agency.

2.6 NO WEAPONS POLICY

The Company believes it is important to have and enforce a clear policy that specifically addresses weapons in the workplace.

The Company prohibits all persons who enter Company property from carrying a handgun, firearm, or prohibited weapon of any kind onto the property regardless of whether the person is licensed to carry the weapon or not.

This policy applies to all Company employees, contract and temporary employees, visitors on Company property and clients and contractors on Company property, regardless of whether or not they are licensed to carry a concealed weapon. The only exceptions to this policy are police officers, security guards or other persons who have been given written consent by the Company to carry a weapon on the property.

All Company employees are also prohibited from carrying a weapon while in the course and scope of performing their job for the Company, whether they are on Company property at the time or not and whether they are licensed to carry a handgun or not. Employees may not carry a weapon covered by this policy while performing any task on the Company's behalf. This policy also prohibits weapons at any Company sponsored functions such as parties, picnics, etc.

Prohibited weapons include any form of weapon or explosive restricted under local, state or federal regulation. This includes all firearms, illegal knives or other weapons covered by the law. (Chemical Dispensing devices such as pepper sprays that are sold legally and commercially for personal protection are not covered by this policy.) If you have a question about whether an item is covered by this policy, please call the Human Resources Department. You are responsible for making sure that any potentially covered item you possess is not prohibited by this policy.

"Company property" covered by this policy includes, without limitation, all Company owned or leased buildings and surrounding areas such as sidewalks, walkways, driveways and parking lots under the Company's ownership or control. Company vehicles are covered by this policy at all times regardless of whether they are on Company property at the time.

Failure to abide by all terms and conditions of the policies described above may result in discipline up to and including termination. Further, carrying a weapon onto Company property in violation of

This policy will be considered an act of criminal trespass and may be grounds for immediate removal from the Company property, and may result in prosecution.

This Policy Shall Not Be Construed To Create Any Duty Or Obligation On The Part Of The Company To Take Any Actions Beyond Those Required Of An Employer By Existing Law.

If you become aware of anyone violating this policy, you are required to notify the Human Resources Department immediately.

2.7 INTERNAL INVESTIGATIONS AND SEARCHES

From time to time, TOM CHESS T GROUP OF COMPANIES LTD may conduct internal investigations pertaining to security, auditing or work-related matters. Employees are required to operate fully with and assist in these investigations if requested to do so.

Whenever necessary, in the Company's discretion, work area (i.e., desks, file cabinets, etc.) may be subject to a search without notice. Employees are required to cooperate. The Company will generally try to obtain an employee's consent before conducting a search of work areas, but may not always be able to do so. To the extent the search is requested by Company management and the employee is present, the employee may refuse the search; provided, however, that such refusal may result in termination of employment for refusal to cooperate.

The Company reserves the right to conduct searches of any person, vehicle or object that enters onto Company property. Pursuant to this provision, the Company is authorized to search desks, purses, briefcases, baggage, lunch containers, clothing, vehicles parked on Company property, and any other item in which a weapon may be hidden. Additionally, the Company may search a vehicle owned by it and used by the employee, and a vehicle owned by an employee that is being used to conduct business on behalf of the Company, regardless of whether the vehicle is located on Company property at the time. Searches may be conducted by Company management or local authorities. The Company reserves the right to conduct searches on its property or authorize searches by law enforcement on its property without the employee being present.

2.8 VIOLENCE IN THE WORKPLACE

TOM CHESS T GROUP OF COMPANIES LTD provides a safe workplace for all employees. To ensure a safe workplace and to reduce the risk of violence, all employees should review and understand all provisions of this workplace violence policy.

PROHIBITED CONDUCT

Any type of workplace violence committed by or against employees will not be tolerated. Employees are prohibited from making threats or engaging in violent activities.

This list of behaviors, while not inclusive, provides examples of conduct that is prohibited:

- Causing physical injury to another person.
- Making threatening remarks.

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- Aggressive or hostile behavior that creates a reasonable fear of injury to another person or subjects another individual to emotional distress.
- Intentionally damaging employer property or property of another employee.
- Possession of a weapon while on TOM CHESS T GROUP OF COMPANIES LTD property, driving company vehicles, or while on company business; inappropriately discussing weapons and their use.
- Committing acts motivated by, or related to sexual harassment or domestic violence.

REPORTING PROCEDURES

Any potentially dangerous situations must be reported immediately to a supervisor or the Human Resources Department. Reports may be made anonymously and all reported incidents will be investigated. Reports or incidents warranting confidentiality will be handled appropriately and information will be disclosed to others only on a need-to-know basis. All parties involved in a situation will be counseled and the results of investigations will be discussed with them. TOM CHESS T GROUP OF COMPANIES LTD will actively intervene at any indication of a possibly hostile or violent situation.

The company does not expect employees to be skilled at identifying potentially dangerous persons. However, employees are expected to exercise good judgment and to inform the Human Resource Department if any employee exhibits behavior, which could be a sign of a potentially dangerous situation. Such behavior includes:

- Bringing weapons with them to the workplace
- Inappropriately discussing weapons and their use
- Displaying overt signs of extreme stress, resentment, hostility, or anger
- Making threatening remarks
- Sudden or significant deterioration of performance
- Displaying irrational or inappropriate behavior

ENFORCEMENT

Threats, threatening conduct, or any other acts of aggression or violence in the workplace will not be tolerated. Any employee determined to have committed such acts may be subject to disciplinary action, up to and including termination. Employees and non-employees engaged in violent acts on the employer's premises will be reported to the proper authorities and fully prosecuted.

2.9 ACCIDENTS AND EMERGENCIES

Maintaining a safe work environment requires the continuous cooperation of all employees. The Company strongly encourages employees to communicate with fellow employees and their supervisor regarding safety issues.

Employees should contact their supervisor, the nearest supervisor in the event of an accident or emergency.

If an employee is injured on the job, TOM CHESS T GROUP OF COMPANIES LTD provides coverage and protection in accordance with the Worker's Compensation Law. When an injury is sustained at work, it must be reported immediately to the employee's supervisor. In turn, the supervisor will notify Management and the Human Resources Department of the incident.

Failure to report accidents is a serious matter as it may preclude an employee's coverage under Worker's Compensation Insurance.

2.10 SMOKE-FREE WORKPLACE

TOM CHESS T GROUP OF COMPANIES LTD maintains a smoke-free workplace in all office locations. In addition, it is the policy of that the use of electronic smoking devices (also known as electronic cigarettes or "e-cigarettes") is prohibited in any place where smoking of tobacco products is prohibited by law. While we certainly respect the rights of smokers, we believe it is in the best interest of all our employees to maintain a policy which prohibits smoking in all TOM CHESS T GROUP OF COMPANIES LTD office facilities nationwide.

2.11 BUSINESS ATTIRE

As an employee of TOM CHESS T GROUP OF COMPANIES LTD, you represent our company to all of our visitors, clients, and co-workers. As a company, we seek to project an image of professionalism to all we come in contact with every day.

Employees are expected to wear appropriate, professional business attire. Clothing should be neat, clean and tasteful. Avoid clothing that may create a safety hazard. Employees should avoid extremes in attire. Unacceptable Attire includes:

- Plain or pocket t-shirt
- Shorts
- Athletic wear
- Spandex, leggings or Lycra such as biker shorts
- Sneakers
- Tank tops, tube tops, halter tops, spaghetti straps - without an over garment
- Provocative attire
- Workout clothes or shoes

Jeans also are not included as business attire unless otherwise specified by the regional manager and/ or client. Regional managers may issue more specific guidelines.

If an obvious policy violation occurs, the department supervisor/manager will hold a private discussion with the employee and ask the employee to go home and/or change his/her attire immediately.

This policy applies to all employees when on company premises or while acting on behalf of the company at any other location.

2.12 FRAGRANCE

Employees are not permitted to wear excessive perfume, cologne or aftershave products in the office.

2.13 SOLICITATIONS, DISTRIBUTIONS, AND USE OF BULLETIN BOARDS

Employees may not solicit any other employee during working time, nor may employees distribute literature in work areas at any time. Under no circumstances may an employee disturb the work of others to solicit or distribute literature to them during their working time.

Persons not employed by TOM CHESS T GROUP OF COMPANIES LTD may not solicit TOM CHESS T GROUP OF COMPANIES LTD employees for any purposes on Company premises.

Bulletin boards maintained by TOM CHESS T GROUP OF COMPANIES LTD are to be used only for posting or distributing material of the following nature:

- Notices containing matters directly concerning Company business; and
- Announcements of a business nature which are equally applicable and of interest to employees.

All posted material must have authorization from the Human Resources Department. All employees are expected to check the bulletin boards periodically for new and/or updated information and to follow the rules set forth in all posted notices. Employees are not to remove material from the bulletin boards.

2.14 INFORMATION TECHNOLOGY HARDWARE/SOFTWARE POLICY

All TOM CHESS T GROUP OF COMPANIES LTD employees will be issued a TOM CHESS T GROUP OF COMPANIES LTD laptop upon hiring. Any other technology assets required for your job function will be identified and submitted following defined processes to the Information Technology department. All TOM CHESS T GROUP OF COMPANIES LTD assets assigned and delivered to an employee are the responsibility of the employee during their entire tenure at TOM CHESS T GROUP OF COMPANIES LTD. They are responsible to follow all Technology usage policies, adhere to refresh of asset requests and per the IT equipment receipt form received at delivery, all assets are required to be returned upon termination of employment.

It is the responsibility of each employee to recognize at all times that TOM CHESS T GROUP OF COMPANIES LTD's assets are acquired for use in the conduct of TOM CHESS T GROUP OF COMPANIES LTD's business pursuits and that personal use of such assets, where permitted, is a privilege that should not be abused.

It is the policy of TOM CHESS T GROUP OF COMPANIES LTD to promote the ethical management of computer hardware and software in the business environment. Business computers and hardware/software shall be dedicated to business use.

TOM CHESS T GROUP OF COMPANIES LTD owns all corporate information resources; use of such resources constitutes consent for TOM CHESS T GROUP OF COMPANIES LTD to monitor, inspect, audit, collect, and remove any information without permission or further notice. Any infraction of corporate acceptable use policies shall constitute a security violation. Employees shall be held accountable and may be subject to disciplinary action and/or criminal prosecution for the unethical use of computer hardware/software.

AMENDMENTS AND REVISIONS

This policy may be amended or revised from time to time as the need arises. Users will be provided with copies of all amendments and revisions.

Violations of this policy will be taken seriously and may result in disciplinary action, including termination, and civil and criminal liability.

Use of the Internet via TOM CHESS T GROUP OF COMPANIES LTD's computer system and the company E-mail system constitutes consent by the users to all of the terms and conditions of this policy.

ACQUIRING HARDWARE AND SOFTWARE

To prevent the introduction of malicious code and to protect the integrity of TOM CHESS T GROUP OF COMPANIES LTD's information resources, all hardware and software shall be obtained from the IT Department. Free-ware software should not be installed on TOM CHESS T GROUP OF COMPANIES LTD assets. If free-ware is required for a TOM CHESS T GROUP OF COMPANIES LTD project, the software must be communicated to the IT Department so that it is added to the approved and supported software list.

Employees may send recommendations to the IT Department if they identify hardware or software That fulfills a departmental or corporate need not currently met by existing hardware or software. The IT Department is free to deny implementation of the suggested hardware or software if:

- The requirements gathering documentation listed in the Referenced Documents Section has been consulted, and the hardware or software does not conform to the policies listed therein
- A substantial number of hardware or software products have been suggested
- The hardware or software does not fulfill the needs of the department or the organization
- The hardware or software does not meet the security requirements of the department or organization
- A similar product has already been evaluated on the list of accepted products
- Initial and on-going cost (acquisition and maintenance)

The following set of documentation should be evaluated before any hardware or software is acquired:

- The software design, implementation and security documents (if acquiring custom developed Software)
- Hardware or software documentation (operating, user manuals, security compliance and other documentation)

Hardware or software evaluation will be performed using TOM CHESS T GROUP OF COMPANIES LTD Information Technology's first look template. The template will evaluate at a minimum the following:

- Years in business

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- Vendor Ownership
 - Features/Functionality that meets the business needs
 - Cloud or On-Premise solution
 - Total cost of ownership (Pricing model)
 - Comparison to existing TOM CHESS T GROUP OF COMPANIES LTD owned software
 - Implementation and training costs
 - System requirements, including:
 - Minimum/recommended RAM
 - Hard drive space
 - Additional software required, e.g. software libraries, databases

In depth implementation plans will be created and followed if hardware or software is acquired.

Hardware or software will not be acquired through user corporate credit cards, office supply, petty cash, or personal expense budgets. All hardware or software will be purchased through the IT department. Acquisition channels will be restricted to ensure proper registration, inventory, and support information is recorded. Purchases made outside of the acceptable processes will not be reimbursed and will be removed from company computers.

Company-owned hardware or software may not be taken home and installed on employee-owned computers, unless permission is granted through a licensing agreement where the publisher has granted home-use licenses as part of the contract. TOM CHESS T GROUP OF COMPANIES LTD commits to tracking any licenses installed for home use and monitoring the use of media and software serial numbers to ensure only approved installations are completed.

Hardware or software will be used in accordance with the publisher's license agreements as required for the employees job function at TOM CHESS T GROUP OF COMPANIES LTD. All software, media, and documentation in use within TOM CHESS T GROUP OF COMPANIES LTD belong to and are controlled by TOM CHESS T GROUP OF COMPANIES LTD.

COMPLYING WITH COPYRIGHT AND LICENSING

Business use of the Internet and E-mail system should always be consistent with the objectives of TOM CHESS T GROUP OF COMPANIES LTD and the work assigned. All software used on TOM CHESS T GROUP OF COMPANIES LTD information resources shall be procured in accordance with the official corporate policies and procedures, and shall be licensed, and registered in TOM CHESS T GROUP OF COMPANIES LTD's name. All employees shall abide by software copyright laws and shall not obtain, install, replicate, or use software except as permitted by the software licensing agreements. Employees may not agree to a license or download any material for which a registration fee is charged without first obtaining the express written permission of the IT Department and their supervisor.

USING PERSONALLY OWNED SOFTWARE

To protect the integrity of TOM CHESS T GROUP OF COMPANIES LTD's information resources, employees shall not use personally owned software on TOM CHESS T GROUP OF COMPANIES LTD information resources unless prior approval is specifically provided by the IT Department.

This includes purchased and licensed applications; shareware; freeware; downloads from bulletin boards, Internet, Intranet, FTP sites, local area networks (LANs) or wide area networks (WANs); and other personally-owned or controlled software. Individuals must also provide proof of purchase to the IT Department when requesting approval to add personally owned software.

PROCESS

All hardware and software acquisitions are processed through IT. All technology assets are tied to the IT fixed assets ledger.

2.15 E-MAIL USE AND ACCESS POLICY

Every TOM CHESS T GROUP OF COMPANIES LTD employee is responsible for using the electronic mail (E-mail) system properly and in accordance with this policy. Any questions about this policy should be addressed to the Human Resources Department.

Even if employees use a password to access the E-mail system, the confidentiality of any message stored in, created, received, or sent from the TOM CHESS T GROUP OF COMPANIES LTD E-mail system still cannot be assured. Any password used by employees must be revealed to TOM CHESS T GROUP OF COMPANIES LTD as E-mail files may need to be accessed.

Even though TOM CHESS T GROUP OF COMPANIES LTD has the right to retrieve and read any E-mail messages, those messages should still be treated as confidential by other employees and accessed only by the intended recipient. Employees are not authorized to retrieve or read any E-mail messages that are not sent to them. Any exception to this policy must receive the prior approval of TOM CHESS T GROUP OF COMPANIES LTD management.

Instant messaging (IM) is to be done with the IM service provided by a platform supported by the IT Department.

CYBER SECURITY

Every TOM CHESS T GROUP OF COMPANIES LTD employee is responsible for being diligent in preventing Cyber Security breaches. Emails are regularly sent by both the Legal Department and the IT Department regarding cyber awareness with information as to what to look out for.

ACCESS AND PRIVACY

Access

You can access your TOM CHESS T GROUP OF COMPANIES LTD email in a number of ways. Outlook on your computer or Outlook on the Web Access, (outlook.office.com) from any Internet browser, Exchange-compatible mobile phones and handhelds

To logon to the TOM CHESS T GROUP OF COMPANIES LTD email system, you must know your TOM CHESS T GROUP OF COMPANIES LTD Network Credentials. If you do not know your TOM CHESS T GROUP OF COMPANIES LTD Network Credentials, please contact the TOM CHESS T GROUP OF COMPANIES LTD IT Helpdesk.

Privacy

Regardless of the method used to access the TOM CHESS T GROUP OF COMPANIES LTD International email system, the confidentiality of any message stored in, created, received, or sent from the SLK Oil & Gas

Services Ltd email system still cannot be assured. Even though TOM CHESS T GROUP OF COMPANIES LTD has the right to retrieve and read any email messages, those messages should still be treated as confidential by other employees and accessed only by the intended recipient. Employees are not authorized to retrieve or read any email messages that are not sent to them. Any exception to this policy must receive the prior approval of TOM CHESS T GROUP OF COMPANIES LTD management, as defined by the delegation of access section of this policy.

DELEGATION OF ACCESS

Access to anyone's email box must follow the following process:

- Request must be made via email to mailbox owners and identify the business reason for the requested access.
- The email, when approved, must then be forwarded to Human Resources for approval
- Once all approvals are met, either the user is given access to a .pst, or the mailbox is added to the user's profile via delegation for 30 days.
- An employee assuming the email address of a separated employee, must follow the same process, however the SMTP alias is assigned to the employee assuming that access.

At no time is a user's network account to be reactivated for any reason other than rehire. All reactivations will happen centrally via the TOM CHESS T GROUP OF COMPANIES LTD IT Helpdesk.

PROHIBITED USE

Prohibited activities when using TOM CHESS T GROUP OF COMPANIES LTD email shall include, but not be limited to, sending or arranging to receive the following:

- Information that violates state or federal laws, or corporate regulations.
- The automatic forwarding of TOM CHESS T GROUP OF COMPANIES LTD email to any third party email system without the direct consent of the EXECUTIVE GROUP CHAIRMAN/CEO TOM CHESS T GROUP OF COMPANIES LTD.
- Using your personal email to conduct TOM CHESS T GROUP OF COMPANIES LTD business
- Unsolicited commercial announcements or advertising material, unless approved by management in advance.
- Solicitations for religious or political causes, commercial enterprises, outside organizations, or other non-job related solicitations.
- Any material that may defame, libel, abuse, embarrass, tarnish, present a bad image of, or portray in false light, the corporation, the recipient, the sender, or any other person.
- Pornographic, racist or offensive material, chain letters, unauthorized mass mailings, or malicious code.



TOM CHESS T GROUP OF COMPANIES LTD's policies against sexual or other harassment apply fully to the email system and any violation of those policies may be grounds for discipline up to and including discharge. Therefore, no email messages should be created, sent, or forwarded if they contain intimidating, hostile, or offensive material concerning race, sex, gender identity, gender expression, color, religion, national origin, ancestry, age, physical disability, mental disability, medical condition, veteran status, family responsibilities, marital status, family care, medical leave status, citizenship status, creed, genetic information, or any other characteristic protected by law.

The email system shall not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary financial information, or similar materials without prior authorization from TOM CHESS T GROUP OF COMPANIES LTD management. Employees, if uncertain about whether certain information is copyrighted, proprietary, or otherwise inappropriate for transfer, should resolve all doubts in favor of not transferring the information and consult TOM CHESS T GROUP OF COMPANIES LTD's Corporate Legal Department.

USAGE GUIDELINES

To ensure reliable operation and exceptional performance, TOM CHESS T GROUP OF COMPANIES LTD Corporate IT has established a set of operating limits and guidelines for the messaging system. With everyone's cooperation, we can ensure that our system will run great and, most importantly, obey the accepted standards for interoperability with other email systems.

MAXIMUM MESSAGE SIZE

No single message, including attachments, may exceed 25 MB (Megabytes). In addition, no message may have more than 25 file attachments (of any size).

MAXIMUM NUMBER OF RECIPIENTS

The limit is 1,500 message recipients per 24 hour period. A distribution list counts as one recipient. If you need a distribution list in order to send out to a large group and a distribution list does not already exist, please contact the TOM CHESS T GROUP OF COMPANIES LTD IT Helpdesk.

DELETED ITEMS FOLDER

Items in Deleted Items folder are there indefinitely until manually deleted. You can recover items removed in the past 3 days by selecting "Recover Deleted Items" from Outlook's "Tools" menu.

JUNK EMAIL FOLDER

Messages in the "Junk Email folder" are automatically deleted after they age 30 days. These messages cannot be recovered. If you are missing a message, be sure to check the junk email folder in your mailbox.

TOM CHESS T GROUP OF COMPANIES LTD SPAM FILTERING

Nearly 80% of all messages received by the TOM CHESS T GROUP OF COMPANIES LTD Messaging System are unsolicited bulk email (SPAM). Companies are continuously trying to improve their defense against SPAM.

Occasionally changes to these protective measures result in the inadvertent blocking of legitimate messages. If you suspect that a legitimate email was blocked, please contact the TOM CHESS T GROUP OF COMPANIES LTD IT Helpdesk. Be ready to provide the address of the person who sent you the email.

FORMATTING

Outlook can render text with full formatting, letting you add stationery, colors, fonts, borders and backgrounds to your messages. Use of these features is not advised and can be construed as unprofessional. Not all email programs handle formatted email messages well. When in doubt, stick to plain text.

TRANSMITTING EMAIL TO “ALL EMPLOYEES”

Employees of TOM CHESS T GROUP OF COMPANIES LTD and all affiliates are prohibited from sending emails to any large regional distribution lists including but not inclusive of “all country” or “all employees” unless expressly authorized by management to do so. Request for access to distribution lists must be made to the HR. Any email needed to be sent to a large population must be addressed to “BCC” to prevent mass replies to the entire distribution list.

CAPITALIZATION

Avoid typing in all capitals. In an email, using all caps is the equivalent of yelling. Save your use of caps for when you REALLY need to make a point.

ATTACHMENTS

Be judicious when sending attachments. If you send an email with an attachment larger than ten megabytes {10MB}, contact the recipient to let them know you have sent a large file. An email failure will be generated if an attachment is greater than 25MB. For those connected at slower internet speeds, large attachments may cause a frustrating system slowdown.

If you have to send very large attachments, please use TOM CHESS T GROUP OF COMPANIES LTD service. This is a web-based system that is designed specifically for the transmission of files. The system is SSL-encrypted and free to use by employees, partners, affiliate, or anyone engaged in a business relationship with of TOM CHESS T GROUP OF COMPANIES LTD

MAILBOXES OF SEPARATED EMPLOYEES

Emails of separated employees are maintained indefinitely in the TOM CHESS T GROUP OF COMPANIES LTD email archiving system. Individual email boxes from separated employees are deleted after 90 days. Access to an employee's email box after 90 days, is limited to email archive searches that must be made through the email archiving system via a request to the TOM CHESS T GROUP OF COMPANIES LTD IT Helpdesk.

EMAIL ARCHIVING SYSTEM

TOM CHESS T GROUP OF COMPANIES LTD utilizes an email archiving system. All messages sent and received in or out of the TOM CHESS T GROUP OF COMPANIES LTD email system are captured for perpetuity. Requests for archived emails must be made via the TOM CHESS T GROUP OF COMPANIES LTD IT Helpdesk, but should be limited to critical business needs and/or litigation review.

2.16 INTERNET

Most employees are being provided with access to the Internet to assist them in performing their jobs. The Internet may be a valuable source of information and research. In addition, E-mail can provide excellent means of communicating with other employees, clients, outside vendors, and other business. Use of the Internet, however, must be tempered with common sense and good judgment.

If you abuse your right to use the Internet, it will be taken away from you. In addition, you may be subject to disciplinary action, including possible termination, and civil and criminal liability.

Your use of the Internet is governed by this policy and the E-mail Policy.

PROHIBITED USE

Prohibited activities when using the Internet include, but are not limited to, the following:

- Browsing explicit pornographic or hate-based websites, hacker or cracker sites, or other sites that the corporation has determined to be off-limits.
- Posting, sending, or acquiring sexually explicit or sexually oriented material, hate-based material, hacker-related material, or other material determined to be off-limits.
- Posting or sending sensitive information outside of the corporation without management authorization.
- Using other services available on the Internet, such as FTP or Telnet, on systems for which the user does not have an account, or on systems that have no guest or anonymous account for the service being used.
- Posting commercial announcements or advertising material.
- Promoting or maintaining a personal or private business.
- Receiving news feeds and push data updates, unless the material is required for corporate business.
- Using non-work related applications or software that occupy excess workstation or network processing time (e.g., processing in conjunction with screen savers.)
- Using chat, chat room discussions, instant messaging, or web cams for a non-work related communication.
- Using the company's Internet connection to download games or other entertainment software, including wallpaper and screen savers, or to play games over the Internet.
- Blogging
- Sending Unsolicited E-mail (Spamming), without the express permission of their supervisors, to persons with whom they do not have a prior relationship.

TOM CHESS T GROUP OF COMPANIES LTD's equal opportunity policy and policies against sexual or other harassment apply fully to the Internet and any violation of those policies may be grounds for discipline up to and including discharge. Therefore, no material may be downloaded, created, sent, or forwarded if they contain intimidating, hostile, or offensive material concerning gender identity, gender expression, , race, sex, color, religion, national origin, ancestry, age, physical disability, mental disability, medical condition, veteran status, family responsibilities, marital status, family care, medical

leave status, citizenship status, creed, genetic information, or any other characteristic protected by law.

DISCLAIMER OF LIABILITY FOR USE OF INTERNET

TOM CHESS T GROUP OF COMPANIES LTD is not responsible for material viewed or downloaded by users from the Internet. The Internet is a worldwide network of computers that contains millions of pages of information. Users are cautioned that many of these pages include offensive, sexually explicit and inappropriate material. In general, it is difficult to avoid at least some contact with this material while using the Internet. Even innocuous search requests may lead to sites with highly offensive content. In addition, having an E-mail address on the Internet may lead to receipt of unsolicited E-mail containing offensive content. Users accessing the Internet do so at their own risk

NO EXPECTATION OF PRIVACY

The computers and computer accounts given to employees are to assist them in the performance of their jobs. Employees should not have an expectation of privacy in anything they create, store, send or receive on the computer system, including email, voicemail or other electronic system. The computer system belongs to the Company and may only be used for business purposes.

MONITORING COMPUTER USAGE

The Company has the right to monitor any and all of the aspects of its computer system, including, but not limited to, monitoring sites visited by employees on the Internet, monitoring chat groups and news groups, reviewing material downloaded or uploaded by users to the Internet, and reviewing E-mail sent and received by users.

BLOCKING OF INAPPROPRIATE CONTENT

The Company may use software to identify inappropriate or sexually explicit Internet sites. Such sites may be blocked from access by Company networks. In the event you nonetheless encounter inappropriate or sexually explicit material while browsing on the Internet, immediately disconnect from the site, regardless of whether the site was subject to company blocking software.

ACCESSING THE INTERNET

To ensure security and to avoid the spread of viruses, employees accessing the Internet through a computer attached to TOM CHESS T GROUP OF COMPANIES LTD's network must do so through an approved Internet firewall. Accessing the Internet directly by modem is strictly prohibited unless the computer you are using is not connected to the Company's network.

VIRUS DETECTION

Files obtained from sources outside the Company, including disks or thumb drives brought from home; files downloaded from the Internet, newsgroups, bulletin boards, or other online services; files attached to E-mail; and files provided by clients or vendors may contain dangerous computer viruses that may damage the Company's computer network. Employees should never download files from the Internet, accept E-mail attachments from outsiders, or use disks or thumb drives from non-Company sources, without first scanning the material with Company-approved virus checking software. If you suspect that a virus has been introduced into the Company's network, notify the IT Department immediately

The IT Department must scan all media from a non-TOM CHESS T GROUP OF COMPANIES LTD source before the media is used.

2.17 NEPOTISM POLICY

No immediate family members of any TOM CHESS T GROUP OF COMPANIES LTD employee shall be hired without the prior approval of the EXECUTIVE GROUP CHAIRMAN/CEO.

DEFINITIONS

"Family member" is defined as one of the following: relationships by blood –parent, child, grandparent, grandchild, brother, sister, uncle, aunt, nephew, niece, and first cousin; and relationships by marriage – husband, wife (as defined by law), step-parent, step-child, brother-in-law, sister-in-law, father-in-law, mother-in-law, son-in-law, daughter-in-law, half-brother, half-sister, uncle, aunt, nephew, niece, spouse/partner of any of the above, fiancée and co-habiting couples or significant others.

If you become an immediate family member of another TOM CHESS T GROUP OF COMPANIES LTD employee during your employment, TOM CHESS T GROUP OF COMPANIES LTD will make every effort to reassign job duties so as to minimize conflicts, if any, of supervision, safety, security, or morale. If accommodations of this nature are not feasible, TOM CHESS T GROUP OF COMPANIES LTD will decide which one of the two employees may continue their employment.

If two employees who are married become separated or divorced, TOM CHESS T GROUP OF COMPANIES LTD may take action in order to minimize or resolve conflicts of supervision, safety, security, or morale.

Violation of this policy may result in disciplinary action up to and including termination of either or both employees.

This policy applies to all current employees and candidates for employment.

2.18 PROCEDURE FOR THE RECEIPT OF SERVICES OF LEGAL PROCESS

POLICY

It is the policy of the Company to provide a procedure to be followed in the event a process server attempts to serve legal process upon the Company. The purpose of the procedure is to assure that the Corporate Legal Department is promptly notified of litigation involving the Company.

SCOPE

This general policy and procedure is applicable to all Company employees, but especially to Corporate Officers, Directors, Project Managers, Field Site Managers and all Company Receptionists.



PROCEDURES FOR CORPORATE HEADQUARTERS

The first person to encounter a legal process server will usually be the Company's main entrance lobby receptionist.

If the Company's Director & Corporate Counsel is present in the building at the time service of process is attempted, he/she should be located, and the process server should be directed to make service of process upon the Director & Corporate Counsel.

If the Director & Corporate Counsel is not present, the receptionist on duty should attempt to locate the Human Resource Manager for receipt of service of legal process

And the process server should be directed to make service of process upon such officer of the Company.

Failing to locate any of the above-mentioned officers of the Company, the receptionist may accept service of legal process.

Where service of legal process is completed upon any of the above name individuals and before the process server leaves the presence of the individual accepting such service, the following information should be recorded in writing on the reverse side of the legal process received:

- The name and title of the process server (after this information has been obtained, the process server need not be detained any longer).
- The time and date that service of process occurred.
- The location of the Company office that service of process occurred.
- The name and title of the individual accepting service of process.
- The signature of the individual accepting service.

After the above procedures have been completed, the legal document that was served should be hand delivered to the Corporate Legal Department as soon as possible.

GENERAL GUIDELINES

No Company employee should accept service of legal process for any company other than TOM CHESS T GROUP OF COMPANIES LTD

No Company employee should accept service of legal process addressed to an individual employee of the Company.

It is the policy of the Company to discourage attempts to serve legal process addressed to an individual employee of the Company on Company premises. Company receptionists who receive requests from process servers to serve legal process on an employee should advise the employee by telephone. If the employee desires to avoid service on Company premises, such employee should contact the Corporate Legal Department. The Corporate Legal Department may or may not attempt to intercede on the employee's behalf to discourage service.

2.19 RECORD RETENTION

Document retention is a costly expense for all organizations both in house and off site. In an effort to standardize our Records Retention Policy for each office, the following applies:

NUMBER OF YEARS TO RETAIN

Accounting and Financial

Invoices to Clients.....	7 years
Bank Reconciliation.....	1 year
Tax Returns and Work Papers.....	Permanent
General Ledgers & Journals.....	Permanent
Audit Reports.....	Permanent
Financial Statements.....	Permanent
Bank Statements & Deposit Slips.....	3 years
Payroll Records.....	7 years
Checks (cancelled, payroll & general).....	8 years
Checks (taxes, property & fulfillment of important contracts).....	Indefinitely
Accounts Payable Vouchers.....	7 years

Administration

Leases Expired.....	7 years
Lease (In Effect)	Indefinitely
Employee Personnel Records	3 years
Insurance Policies (Expired).....	Permanent
Insurance Policies (In Effect)	Indefinitely
Summary Annual Reports	7 years minimum
OSHA Records (job related injuries & illnesses)	5 years
OSHA Records relating to:	
• Toxic	30 years after termination
• Substance & blood.....	30 years after termination
• Pathogen expose	30 years after termination
Affirmative Action Plan	2 years from the date of making the record or personnel action whichever occurs later

Claims/Project Documents

TOM CHESST GROUP OF COMPANIES LTD/Client Contract File	TOM CHESST GROUP OF COMPANIES LTD/Client Agreement and Modifications	Permanent
TOM CHESST GROUP OF COMPANIES LTD/Client Correspondence (Post engagement).....	10 years after conclusion of project	
TOM CHESST GROUP OF COMPANIES LTD Internal Administration	10 years after conclusion of project	
(Conflict Checks, Project Initiation Form, Project Budget, Credit Memos, Project Close-Out Form, Etc.)		
Sub-consultant Agreements/Invoices	10 years after conclusion of project	
TOM CHESST GROUP OF COMPANIES LTD Internal Communications/Misc.	10 years after conclusion of project	
US Government Contracts	10 Years after conclusion of	

project

State and Local Contracts 10 Years after conclusion of project

TOM CHESS T GROUP OF COMPANIES LTD Work Product Files

Issue Files 10 years after conclusion of project

Final Report(s)/Presentations (by Title and Date) 10 years after conclusion of project

Draft Reports and Revisions (not to be saved)

Consultant(s) Working Papers (by Consultant) 10 years after conclusion of project

Testimony/Transcript 10 years after conclusion of project

Original Project Records/Plans Return to client upon client authorization or within 2 years of close of project, whichever occurs first.

It is the responsibility of each Project Manager to supervise the closing of each project. If there is a requirement that a file be retained for a specific minimum time period, whether set forth in statute, regulation, and contractual provision or otherwise, the retention period must comply with that requirement. The cost to TOM CHESS T GROUP OF COMPANIES LTD should be reasonable.

At the conclusion of each project, the Project Manager should review all documents to remove all extraneous or unnecessary documents, including duplicative material.

Upon completion of the project, the client should be consulted to determine the client's desire with respect to the return of the client's records, important papers, original or other materials of potential usefulness to the client. The letter forwarding these materials to the client should advise the client that, as a matter of standard procedure, the remainder of the file would be stored for the retention period and then destroyed as a matter of course.

The attached Filing Closing Checklist should be completed and attached to the documents along with the transmittal which will include a description of the document, project name, job number, Project Director's name and destroy date.

With respect to discarding documents, request guidance from the client regarding legal determination of disposition of project records which should be made with respect to confidential matters as to whether it should be disposed of by using shredding equipment located in each office. Confidential records and documents should not be thrown into wastebaskets with regular trash.

Not less than 90 days before the expiration of the retention period a notice will be sent to you regarding these documents. You may direct the files to be kept for some further period of time. Assuming no objection, the documents will be destroyed at the expiration of the retention period.

Litigation Hold/Suspension of Document Destruction Compliance

The foregoing applies unless TOM CHESS T GROUP OF COMPANIES LTD is subject to a duty to preserve (or halt the destruction of) documents once litigation. An audit or a government investigation is reasonably anticipated. Further, federal and state laws impose criminal liability (with fines and/or imprisonment

for not more than 20 years) upon whoever knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any record, document or tangible object with the intent to impede, obstruct or influence the investigation or proper administration of any matter within the jurisdiction of any department or agency of Nigeria or in relation to or contemplation of any such matter or case.

Therefore, if the Project Manager becomes aware that litigation, a governmental audit or a government investigation has been instituted, or is reasonably anticipated or contemplated, the Project Manager shall immediately order a halt to all document destruction under this Policy, communicating the order to all affected constituencies in writing.

The Project Manager may thereafter amend or rescind the order only after conferring with legal counsel. If any board member or staff member becomes aware that litigation a governmental audit or a government investigation has been instituted or is reasonably anticipated or contemplated with respect to the organization and they are not sure whether the Project Manager aware of it they shall make the Project Manager aware of it. Failure to comply with this Policy including, particularly disobeying any destruction halt order, could result in possible civil or criminal sanctions. In addition, for staff, it may lead to disciplinary action including possible termination.

Legal Documents

- Litigation Files 5 years from end of litigation (except keep copies of complaint, answer, deposition transcripts and trial transcripts for 5 years; settlement agreements, releases, and court decisions indefinitely)
- Transaction Files: 10 years from date of transaction (except keep copies of closing documents Permanent)
- Corporate Books and Records:Permanent
- Proposals 5 years from date of proposal



2.20 SECURITY

The following security considerations are offered to help maintain a secure workplace. Be aware of persons loitering for no apparent reason (e.g., in parking areas, walkways, entrances/exits and service areas) and report any suspicious persons or activities to the Human Resources Department or to any director. When unscheduled visitors arrive, always check with the intended party to ensure they wish to receive this visitor. Secure your desk and your computer at the end of the day or when called away from your work area for an extended length of time and do not leave valuable and/ or personal articles in or around your work area that may be accessible. TOM CHESS T GROUP OF COMPANIES LTD is not responsible for the loss or theft of employee's personal belongings.

2.21 HOUSEKEEPING

All employees are expected to keep their work areas clean and organized. Common areas such as lunch rooms and restrooms should be kept clean by those using them. Please clean up after meals and dispose of trash properly.

2.22 INCLEMENT WEATHER/NATURAL DISASTER

In the event of severe weather or a natural disaster that prevents employees from safely traveling to and from work, the following leave policies will apply:

Inclement weather - If weather conditions prevent you from safely traveling to an office or other work location, please notify your manager and use your Paid Time Off time.

Natural disasters - In the event of a natural disaster such as fire, flood, terrorist act, political or civil unrest, extreme inclement weather, etc., an office or other work location may be closed at the discretion of management or our client. If an office or other work location is closed, then you may use Administrative time on your timesheet. For instructions on reporting to another location in the event of the closing of an office or other work location, please contact the corporate office.

In either case above, if you are able to work from home, then please do so, and bill that time (billable or unbillable as the case may be) to your timesheet.

2.23 SAFETY

TOM CHESS T GROUP OF COMPANIES LTD is committed to providing a safe and healthy workplace for all its employees. TOM CHESS T GROUP OF COMPANIES LTD, as a company, will take the appropriate steps to comply with the applicable standards issued by the Occupational Health and Safety Administration (OSHA), as well as the applicable requirements of any state and local agencies where work is performed. All employees must be aware, and comply with, the provisions of the safety and health program established by the client for a specific jobsite. The responsibility for the success of the safety and health program is shared by management and all employees working at TOM CHESS T GROUP OF COMPANIES LTD.

The objective of any safety and health program is to reduce or eliminate disabling injuries and illnesses. It is the policy of TOM CHESS T GROUP OF COMPANIES LTD to operate within the scope and procedures of the jobsite safety and health program and to exercise all precautions necessary to protect employees from all accidents. We expect all employees to work according to safe practices.

Employees are expected to take an active role in promoting workplace safety, and are strongly urged to recommend actions to improve the effectiveness of the jobsite program to their manager. Any employee who witnesses an accident or an unsafe working situation must report it promptly to their manager.

Management shall insist that employees observe and obey every rule, regulation and order necessary for the safe conduct of work, and shall take such action necessary to obtain compliance. You should take note of where the fire extinguishers, first aid kits, and emergency exits for your department are located as well as the means of exiting the work area in an emergency.

When working on an active construction jobsite, you must wear your hardhat in all areas where they are required to be worn, as well as follow all other health and safety requirements established for the jobsite. If you do not currently have one, or if your hardhat is damaged or is in any way not in the condition it was when issued, please notify the Human Resource Department immediately so that one can be issued to you. In addition, all hard hats have an expiration date stamped inside of the hat. If you notice that your hat has expired, please request a new one through the HR Department

2.24 SECURITY MANAGEMENT PLAN

TOM CHESS T GROUP OF COMPANIES LTD is aware of the need to embed risk and security management across the entire organization in a consistent manner. TOM CHESS T GROUP OF COMPANIES LTD employees at all levels are required to have an understanding of risk and security management and view it as a fundamental part of the organizations activities.

TOM CHESS T GROUP OF COMPANIES LTD has a large number of employees these employees may find themselves working in unfamiliar environments or situations, which are subject to increased risks and threats and may be less prepared to handle these situations.

TOM CHESS T GROUP OF COMPANIES LTD has developed a Security Management Plan (SMP). It is intended to serve as a master plan that ties all subsequent plans and procedures together into a single consistent and centralized security management strategy. The plan outlines key contingencies and processes in accordance with TOM CHESS T GROUP OF COMPANIES LTD's Corporate Security Policy. It is intended to promote operational readiness and aid in the mitigation of prevalent risks/threats.

To support the implementation of the SMP, TOM CHESS T GROUP OF COMPANIES LTD retains the services of consultants to provide advice and support on matters related to risk and security. This includes the potential evacuation of TOM CHESS T GROUP OF COMPANIES LTD employees on assignments, a decision that ultimately rests with TOM CHESS T GROUP OF COMPANIES LTD's Executive Group Chairman/CEO. Any decision to evacuate TOM CHESS T GROUP OF COMPANIES LTD employees will be predicated on a formal risk assessment and underpinned by predetermined indicators and warnings. TOM CHESS T GROUP OF COMPANIES LTD employs a graduated response to risk and security related concerns adapting its operating posture to events to ensure the safety and security of its employees.

EVACUATION PLANNING

Evacuation planning is a good example of how this graduated approach is applied. An Evacuation Plan is much more than just a plan for exiting a location; it provides a flexible continuum that takes into account the wide range of circumstances that might impact TOM CHESS T GROUP OF

COMPANIES LTD's operations in a particular country and offers guidance on hibernation, relocation or program suspension and the evacuation of personnel.

Each plan provides a phased approach to modifying the organizations security posture as the situation evolves along with a physical plan, which can be effectively implemented if the situation deteriorates.

Travel details for TOM CHESS T GROUP OF COMPANIES LTD employees requiring evacuation or relocation will be forwarded to the consultant by the Main Office Point of Contact. In the event of a loss of communication, the local HR Department will access the latest data placed on the Server through automatic back-ups that occur daily, and shall notify the Consultant. It is therefore imperative that employee details are updated regularly in the Oracle Self-Service system as the HR Department will rely on this data to prepare the manifest for evacuation.

Evacuation may occur by either commercial or chartered flights depending on the circumstances. Other modes of transport will be considered if the air travel is not viable. Affected personnel will be advised to assemble at nominated concentration points, adhering to the procedures outlined in the plan. This and other critical information will be communicated via the "Warden System", an internal call-tree which has been created to provide effective communications in the event of a crisis or emergency. No personnel should unilaterally attempt either to travel internally or to leave the country without authorization and direction.

2.25 PERSONAL DEVICES POLICY

While at work, employees are expected to exercise discretion in using personal cellular phones. Excessive personal cell phone use (i.e. Social Media, texting, etc.) during the workday, regardless of the phone used, can interfere with employee productivity and be distracting to others. Employees should restrict personal cell phone use during the work hours, and should use personal cell phones only during breaks or lunch periods. Cell phones shall be turned off or set to silent or vibrate mode during meetings, conferences and in other locations where incoming calls may disrupt normal workflow.

2.26 PROVIDING ITEMS OF VALUE

Because of its sensitivity, providing anything of value – such as a gift, a meal, or entertainment – to a Government Official is **strongly discouraged**, and employees are encouraged to prohibit the practice altogether. In markets where this practice is not prohibited, Company employees must exercise caution before giving or offering anything of value to a Government Official.

Any gift given to a Government Official must comply with the following policies and procedures.

POLICIES AND PROCEDURES:

- No quid-pro-quo. You may not give anything of value to a Government Official if it could reasonably be expected to affect the outcome of a government decision or a business transaction or to confer any other advantage on the Company.
- Basic requirements. You may only provide something of value to a Government Official if doing so is:
 - legal under local law,

-
- permissible under the internal policies of the recipient's organization, and
 - in accordance with local business custom,
 - Business courtesies also must be:
 - modest in value and do not exceed N10,000.00
 - infrequently provided to the same person,
 - appropriate for the occasion, and
 - of a nature that it would not embarrass Company if publicly disclosed.
 - Properly documented. Anything of value that is given to a Government Official must be properly documented to reflect:
 - the occasion,
 - the recipient,
 - The recipient's organization and position.
 - a description of the thing of value provided, and
 - The value.
 - Also applies to families. The policies and procedures in this section also apply to things of value that are given to family members of Government Officials.
 - Prior approval required. Unless the EXECUTIVE GROUP CHAIRMAN/CEO has approved specific rules for your business unit (such as rules governing permissible frequency and monetary limits for meals with Government Officials), you must obtain advance written approval from the EXECUTIVE GROUP CHAIRMAN/CEO before giving or offering anything of value to any Government Official.

TRAVEL, LODGING, AND RELATED EXPENSES FOR A FOREIGN OFFICIAL:

The Company may occasionally be asked to pay for a Government Official's travel or related expenses. The following policies and procedures apply to all such expenditures.

- Basic requirements. The Company may only pay for a Government Official's travel or related Expenses if:
 - the travel is for a legitimate business purpose that is related to the Official's performance of his lawful duties, such as the demonstration of Company's property or services,
 - the expenditure is legal under local law,
 - the cost is reasonable given the Official's seniority,
 - no friends or family members are traveling at the Company's expense, and
 - No stopovers are planned that are not directly connected to the business purpose of the travel, unless the stopover is at the expense of the Government Official and results in no additional cost to Company.

- No per diem payments. Per-diem payments to a Government Official in relation to the Official's travel are prohibited.
- Prior approval required. All travel or related expenses that are incurred on behalf of any Government Official must be approved in advance by the Group President and the Corporate Legal Department
- Pay vendors directly. Payments for travel or related expenses should be made directly to an airline or other vendor. Only if that is not possible may reimbursement is made against a written receipt.

2.27 CHARITABLE CONTRIBUTIONS

Charitable Organizations that contribute to the well-being of communities depend on corporate Charitable Contributions to support their activities. For this reason, Company believes that it has an obligation as a corporate citizen to support worthy Charitable Organizations. In determining eligibility for making a charitable contribution, Company will only consider an organization, a program or an activity that meets all of the following criteria:

Must be either:

- a Registered NGO in Nigeria;
- a school or educational institution in Nigeria; or
- an international charitable organization, school or educational institution

Directly impacts or benefits communities around the world where Company has a permanent office or project site

Religious organizations that fit the above criteria are eligible for charitable contributions in the sole discretion of the Executive Group Chairman/CEO.

Payments to organizations such as a Chamber of Commerce, a trade association and similar non-profits are not considered charitable contributions.

UNLESS APPROVED BY THE COMPANY EXECUTIVE GROUP CHAIRMAN/CEO, OR DESIGNEE, THE COMPANY WILL NOT CONSIDER SUPPORT TO:

- Capital campaigns
- Individuals
- Organizations located where Company does not have offices other than selected international, national and regional programs
- Political, labor, trade union, fraternal organizations or civic clubs and all organizations that carry on propaganda or otherwise attempt to influence legislation
- Advertising in programs or journals unless associated with a Company supported activity, event or funded program

- Support of school activities, clubs and events unless they involve science, technology, engineering or math education

NON-MONETARY CHARITABLE CONTRIBUTIONS:

Property that is donated by Company usually consists of inventory and fixed assets. When fixed assets are donated to a Charitable Organization, the Office of the Chief Financial Officer determines the Proper accounting for the Charitable Contribution

AUTHORIZATION, REVIEWS, AND APPROVALS:

The Executive Group Chairman/CEO is required to review and approve any Charitable Contribution made on behalf of the company prior to disbursement of funds, goods or services to a charitable organization.

The authorization of the EXECUTIVE GROUP CHAIRMAN/CEO is also required for any Charitable Contributions that either involve, or are provided on behalf of Government Officials, including state-owned or state-controlled entities.

2.28 SOCIAL MEDIA POLICY

Social Media encompasses a broad range of forms, including internet forums, blogs and micro blogs, online profiles, wikis, podcasts, pictures and video, email, instant messaging, music-sharing and voice over IP, to name just a few. Examples of social media applications are LinkedIn, Facebook, MySpace, Wikipedia, YouTube, Twitter, Yelp, Flickr, Second Life, Wordpress, Zoom Info, Yammer and numerous others.

When you are participating in social networking, you are representing both yourselves personally and TOM CHESS T GROUP OF COMPANIES LTD. It is not our intention to restrict your ability to have an online presence and to mandate what you can and cannot say. We believe social networking is a very valuable personal and professional tool and continues to advocate the responsible involvement of all TOM CHESS T GROUP OF COMPANIES LTD employees in this space. While we encourage this online collaboration, we would like to provide you with a Company policy and set of guidelines for appropriate online conduct and to assist you in avoiding any potential misuse of this communication medium.

POLICY GUIDELINES:

- Do not post any confidential, sensitive or proprietary financial or other business information about TOM CHESS T GROUP OF COMPANIES LTD or any of our clients or potential clients.
- Speak respectfully about our current, former and potential employees, clients, partners, vendors, sub-consultants and competitors. Do not engage in name-calling or behavior that will reflect negatively on TOM CHESS T GROUP OF COMPANIES LTD's reputation or on you.
- Beware of comments that could reflect poorly on the Company or you. Social media sites are not the forum for venting personal complaints about supervisors, co-workers, or the Company.
- As a TOM CHESS T GROUP OF COMPANIES LTD employee, be aware that you are responsible for the content you post and that information remains in cyberspace forever.

- Use privacy settings when appropriate. Remember, the internet is immediate and nothing posted is ever truly private nor does it expire.
- If you see unfavorable opinions, negative comments or criticism about TOM CHESS T GROUP OF COMPANIES LTD or you, do not try to have the posts removed or send a written reply that will escalate the situation. Forward this information to the Corporate Human Resources or Corporate Legal Department if you think it warrants the Company's attention.
- Many sites like Facebook and Twitter blur the lines between personal and professional. Keep this in mind and make sure to have a balance of information that shows both your personal and professional sides.
- Be respectful of others. Think of what you say online in the same way as statements you might make to the media, or emails you might send to people you do not know. Stick to the facts, try to give accurate information and correct mistakes right away.
- Do not post obscenities, slurs or personal attacks that can damage TOM CHESS T GROUP OF COMPANIES LTD's reputation or your own.
- When posting to social media sites, be knowledgeable, interesting, honest and add value. TOM CHESS T GROUP OF COMPANIES LTD's outstanding reputation and brand is a direct result of our employees and their commitment to uphold our core values of Integrity, Dedication, Teamwork and Excellence.
- Do not infringe on copyrights or trademarks. Do not use images without permission and remember to cite where you saw information if it is not your own thoughts.
- Be aware that you are not anonymous when you make online comments. Information on your networking profiles is published in a very public place. Even if you post anonymously or under a pseudonym, your identity can still be revealed.
- If contacted by the media please refer them to TOM CHESS T GROUP OF COMPANIES LTD's Marketing and Corporate Communications Department.
- It is recommended that you notify your supervisor and the Marketing and Corporate Communications Department before posting any comments relating to TOM CHESS T GROUP OF COMPANIES LTD, TOM CHESS T GROUP OF COMPANIES LTD's clients or TOM CHESS T GROUP OF COMPANIES LTD's services on any social media site. This can be done via email to both parties stating the nature of the comment or discussion and the subject website address.
- If you author a public discussion group or blog, note that "individual professional commentary" on issues posted on blogs and discussion boards will automatically pick up that individual's profile and, therefore, associate them with their employer. As such, any comment or participation in that forum will be directly linked to TOM CHESS T GROUP OF COMPANIES LTD. Be aware that "individual professional commentary" is not personal commentary, but will be portrayed as originating from or be associated with TOM CHESS T GROUP OF COMPANIES LTD. If you are the creator of any blog, cite the following privacy statement: *"The comments made on this blog site are that of the individual who is posting, and in no way a representation of the views of his/her employer."* If you choose to cite your employment with TOM CHESS T GROUP OF COMPANIES LTD on a Facebook, LinkedIn or other social media website, the job title and description must match those provided by TOM CHESS T GROUP OF COMPANIES LTD's Human Resources Department (i.e. do not change your TOM CHESS T GROUP OF COMPANIES LTD title or job description).
- No employee is permitted to create a TOM CHESS T GROUP OF COMPANIES LTD company

profile on any social networking sites without obtaining written permission from the Marketing and Corporate Communications Department prior to creating the profile.

TOM CHESS T GROUP OF COMPANIES LTD may monitor content on the internet and reserves the right to remove or attempt to remove posts that violate this policy.

Users who violate the above policy may be subject to discipline, up to and including termination of employment. If you have any questions about this policy or a specific posting out on the web, please contact TOM CHESS T GROUP OF COMPANIES LTD's Human Resources or Corporate Legal Departments.

2.29 VEHICLE SAFETY AND DRIVING POLICY

General Company Rules and Policies

TOM CHESS T GROUP OF COMPANIES LTD. "TOM CHESS T GROUP OF COMPANIES LTD" or "Company" will assign Company-owned vehicles to employees in accordance with TOM CHESS T GROUP OF COMPANIES LTD's project requirements. All employees who are assigned a Company-owned vehicle must possess a valid driver's license and also meet the requirements of TOM CHESS T GROUP OF COMPANIES LTD's Motor Vehicle Report "MVR" evaluation. In the event you are no longer working on a project that requires a vehicle, you must turn in the TOM CHESS T GROUP OF COMPANIES LTD vehicle within 24 hours.

Prohibited Actions

The following actions are prohibited and may result in the immediate revocation of driving privileges:

- Driving while impaired: The employee must not operate a vehicle at any time when his/her ability to do so is impaired, affected, influenced by alcohol, illegal drugs, prescribed or over-the-counter medication, illness, fatigue or injury.
- Hitchhikers and unauthorized passengers: Employees driving a company vehicle must not pick up or transport hitchhikers or other unauthorized passengers. Unauthorized passengers include those individuals who are not Company employees, not affiliated with the Company or not contracted to conduct specific Company business.
- Payment for carrying passengers or materials: Employees driving a Company vehicle must not request or accept payment for carrying passengers or materials.
- Radar detectors: Employees driving a Company vehicle must not use any radar detector, laser detector or similar device.
- Towing: Unless authorized, employee driving a Company vehicle must not tow push or pull another vehicle or trailer.

- Hazardous materials: Unless authorized, employees driving a Company vehicle must not transport any hazardous materials.
- Employees are required to be familiar with and comply with local laws before using a wireless device while operating a motor vehicle for business purposes. Safe operation of any vehicle in the performance of Company business is the responsibility of the driver and must be given appropriate attention at all time. Additionally, all employees are prohibited from using data services on their wireless devices, such as accessing the mobile web or other distracting activities while driving. Regardless of the circumstances, including slow or stopped traffic, employees are strongly encouraged to pull off to the side of the road and safely stop the vehicle before placing, texting, or accepting either a business or personal call.
- Employees are prohibited from using personal stereo devices and handheld wireless audio devices while operating a Company vehicle unless using a hands free device.
- Employees who are charged with traffic violations will be solely responsible for all liabilities that result from such actions.

Offering Assistance

Employees driving a Company vehicle must not assist disabled motorists or accident victims beyond their level of medical expertise. If an employee is unable to provide the proper medical care, he/she must restrict his/her assistance to the notification of proper authorities.

Required Reporting

Employees and "Permitted Users" (see Permitted Use section) must meet the following accident, license suspension and violation reporting criteria:

- Accidents: Must be reported immediately to the insurance company that is found on your Company issued identification card and reported to the Director and the Legal Department
- Violations: The following motor vehicle violations issued while operating any vehicle at any time must be reported to Director
- License suspension or revocation of driving privileges: Must be reported the next business day.
- Moving violations: Must be reported within three (3) business days of conviction.
- Serious moving violations: Must be reported within one (1) day of citation issuance.
Serious moving violations include:
 - Driving while impaired/intoxicated

- Reckless driving
- Leaving the scene of an accident
- Speeding that is equal to or greater than 15 mph over the posted speed limit

Required Cooperation with Company Management and Enforcement Agencies

Employees and Permitted Users must cooperate with Company officials and/or law enforcement agencies in all matters such as violation of Company policies and/or accident investigation.

Required Use of Seat Belts

Employees and all occupants are required to wear safety belts when the vehicle is in motion. Employees are responsible for ensuring passengers wear their safety belts.

Required Compliance with State/Traffic Laws

Employees must abide by the Federal, State and local motor vehicle regulations, laws and ordinances.

Insurance

TOM CHESS T GROUP OF COMPANIES LTD maintains Collision and Liability coverage for all Company-owned vehicles. Each Company-owned vehicle will be provided with a proof of insurance identification document. **The insurance card must be kept in the glove box of that vehicle at all times.**

Tax Liabilities

TOM CHESS T GROUP OF COMPANIES LTD has provided a Company vehicle to you. The FIRS requires the value of the personal use of your Company provided vehicle to be included in your compensation. Because you are receiving a non-cash benefit, that benefit is considered compensation and will be subject to income and payroll taxes based upon the value of the car.

The following is clarification of what is meant by the terms "business use" and "personal use" of a vehicle. Business use of a Company vehicle is defined as using the vehicle to perform some aspect of your job required by TOM CHESS T GROUP OF COMPANIES LTD. It may be making inspections, deliveries, traveling, and in certain situations the Company may require the employee to take the vehicle home for the Company's convenience.

Personal use encompasses anything that is not business use (as defined above), including commuting. You are required to log your commuting miles as personal use. If you are using a Company vehicle, you are required to keep a Mileage Reimbursement Form to keep track of all trips taken in the vehicle. The Mileage Reimbursement Form includes the date, mileage at the start of the trip, mileage at the end of the trip, purpose of the trip, commuting mileage, etc. This information is used to determine the percentage of personal vs. business use. These percentages will be used in determining the taxability of the personal use of the vehicle.

Vehicle Log

In order to comply with regulations, the individual to whom the vehicle is assigned is required to maintain a Mileage Reimbursement Form, in which each business trip is recorded, including the date,

destination, purpose of the trip and the beginning and ending odometer readings. All mileage, business and commute use, must be recorded on the Mileage Reimbursement Form. Trips between employees' primary/permanent residence (home) and office or between home and assigned work locations are considered commuting mileage.

If employees are using a Company vehicle, it is required that each employee keep a Mileage Reimbursement Form to keep track of all trips taken in the car. This is used to determine what percentage of the mileage was for personal use and what percentage of the mileage was for business use. These percentages will be used in determining the commuter's taxability of the personal use of the vehicle.

Violations

Parking tickets, traffic fines or other penalties imposed for improper operation of a rental car, company vehicle and all violations of the law are the responsibility of the employee and are not Reimbursable

Company and Personal Property

Nothing should be placed inside a TOM CHESS T GROUP OF COMPANIES LTD company vehicle other than company issued property and the necessary personal property required to perform work services only (collectively "Permitted Property"). Company computers should be removed from company vehicles whenever possible. Any Permitted Property being transported within the vehicle should be placed out of sight when the vehicle is not occupied to help deter theft. The Company will not reimburse the

Employee for the theft of personal property from company vehicles

Permitted Use

Company vehicles may be driven only while on Company business. Employees who are assigned Company vehicles are permitted to use them to commute to and from their assigned work location but must return directly to their listed residence (temporary or permanent) of office location. Any variance to this policy must be approved by EXECUTIVE GROUP CHAIRMAN/CEO

Permitted Users

Company vehicles may only be driven by authorized company employees. No one other than the employee assigned to that Company vehicle is permitted to operate the Company vehicle except with the written permission of EXECUTIVE GROUP CHAIRMAN/CEO

Minimum Employee Eligibility Criteria

MVR's will be requested immediately upon the request of a Company vehicle. TOM CHESS T GROUP OF COMPANIES LTD reserves the right to perform random MVR checks on all employees. Employees will be required to sign a Consumer Disclosure and Authorization Form in order for the Company to secure the MVRs.

The Company has established criteria to minimize the "at-risk" behavior, which causes accidents, injuries and property damage. All current and prospective employees must meet these standards to qualify for and maintain Company vehicle driving privileges.

Driving behavior is evaluated on a "points system" in which violations are assigned higher points according to their increasing likelihood in predicting crashes.

Evaluations will occur prior to granting driving privileges and at least annually, depending on previous driving record, and traffic violations from the prior 36 months will be included in each evaluation.

Accident Scene Procedures

Employees will take the following actions when there are injuries to persons and/or damage to other vehicles or property:

- Notify The Police. Contact the police and emergency services.
- Do Not Let The Situation Get Worse. Protect the scene of the accident.
- Stop Immediately And Determine The Damage. Avoid obstructing traffic or creating a greater hazard.
- Aid The Injured. Check on the other party to determine if they need medical attention. As a reminder, general Company Policy on "Offering Assistance" is shown below:
"Employee driving a Company vehicle must not assist disabled motorists or accident victims beyond their level of medical expertise. If an employer is unable to provide the proper medical care, he/she must restrict his/her assistance to the notification of proper authorities."
- Collect Information. If possible, exchange insurance and other information from the other party involved but do not speak about the accident.
- Get Witnesses Information (if possible). Request driver's license, insurance and registration information. If possible take a cell phone photo of all.
- Take Scene Photographs. Only take photographs of the scene in a safe manner if the scene permits without further danger.
- Make No Statements. Do not make any statements, admit fault or sign anything (other than to police, Company officials, and Company insurance representatives).
- Check On The People Involved. Check on the other people involved, but do not speak about the accident until the police or Company officials arrive on-scene. If a witness talks to an employee it is fine but do not volunteer information to them about the facts of the accident.
- Notify The Company. Notify the EXECUTIVE GROUP CHAIRMAN/CEO and the Legal Department as soon as possible at (215) 309-7700 at the Corporate Offices.
- Notify The Insurance Company. Contact the insurance company that is found on your Company issued identification card.

Accident Review

All accidents will be reviewed by the Human Resource Manager. The review will be based on the

employee and police reports and available witness accounts. The purpose of the review is to collect the necessary information to defend the Company in any litigation proceedings, determine accident preventability and to consider improvements to avoid such future occurrences.

Accident Classifications

Non-preventable accident:

Accidents that occur despite the fact that an employee exercises every reasonable precaution to avoid the incident

Examples of non-preventable accidents include, but are not limited to:

- Animal strikes
- Struck while legally parked
- Struck by other vehicle while stopped in traffic

Preventable accident:

An accident, as determined by management, where the employee fails to exercise every reasonable precaution to avoid the incident

Major preventable accident:

A preventable accident arising from:

- a lane change,
- rear end collision or intersection incident, which resulted in a fatality, injury requiring treatment away from the scene or disabling damage (tow away) to any vehicle

Maintenance and Inspection

Employees are responsible to ensure that the Company assigned and owned vehicles are well maintained and safe to operate. Employees should be cognizant of the appearance of the vehicle, including the condition of the upholstery, body, paint, decals, windows and overall general condition. Employees must ensure that the applicable state vehicle inspection and registration is current and valid.

Employees should conduct routine vehicle inspections to ensure that the vehicle is in safe operating condition. In the event a defect is discovered such as poor braking response, fluid leaks, excessive tire wear, low fluids, etc., the employee must take action to have the condition corrected.

Repairs outside the scope of routine maintenance and normal wear and tear must be authorized and approved by the EXECUTIVE GROUP CHAIRMAN/CEO.

All maintenance must be carried out on a timely basis and must be performed by an authorized mechanic.

Fuel Cards

Gas cards may be issued and assigned to Company owned vehicles. Cards must remain in assigned vehicle and treated as an asset of vehicle. In no circumstance shall Company issued fuel card be used to fuel a personal vehicle.

Use of company issued fuel card requires current odometer reading be entered at point-of-sale. Misrepresentation or usual use can trigger fraud alert and render the card useless.

Expense Statements

Expenses for Company vehicles must be completed and submitted not more than 30 days from the incurred expense.

2.30 ACQUISITION OF NEW VEHICLES

Selection of Vehicle

For projects requiring procurement of a vehicle, TOM CHESS T GROUP OF COMPANIES LTD should conduct an evaluation of vehicle options. This evaluation, coordinated by TOM CHESS T GROUP OF COMPANIES LTD should include, but is not limited to, available vehicles, relocation, price, and incentives provided by dealers and manufactures.

Acquisition of a vehicle must have business justification and documentation as fully billable to a client. This should include, but is not limited to, vehicle cost, maintenance, gas, insurance and supplemental safety equipment.

Required Approvals

Any request for a new vehicle must be submitted to EXECUTIVE GROUP CHAIRMAN/CEO TOM CHESS T GROUP OF COMPANIES LTD ideally two months prior to the desired date

Following business justification, the Human Resource Manager TOM CHESS T GROUP OF COMPANIES LTD will commence negotiations with preferred vendors. Once agreement on a new vehicle is reached and the Client approves the terms, the request and the vehicle selected must be submitted to the EXECUTIVE GROUP CHAIRMAN/CEO TOM CHESS T GROUP OF COMPANIES LTD's at least one month prior to date of intended use for final approval.

Once approval from TOM CHESS T GROUP OF COMPANIES LTD's CEO is received, the agreement may be executed by the CEO or TOM CHESS T GROUP OF COMPANIES LTD Human Resource Manager provided with written authority of the CEO to execute the acquisition.

No Company vehicle may be leased or purchased without the approval of TOM CHESS T GROUP OF COMPANIES LTD's CEO. Violation of this policy may lead to termination of employment.

2.31 POLITICAL CONTRIBUTIONS

This Political Contribution Policy establishes the responsibilities of TOM CHESS T GROUP OF COMPANIES LTD. and their directors and employees, as well as the spouses and any children living within their household, with regard to political contributions or political fundraising activities. This policy also applies to agents acting in the name of or on behalf of TOM CHESS T GROUP OF COMPANIES LTD.

...building perfection

To prevent potential prohibition of TOM CHESS T GROUP OF COMPANIES LTD providing services to public entities based on certain provisions restricting political contributions in TOM CHESS T GROUP OF COMPANIES LTD's contracts, and Nigeria local, state and federal laws, TOM CHESS T GROUP OF COMPANIES LTD has enacted the following policy:

- TOM CHESS T GROUP OF COMPANIES LTD directors and employees, as well as their spouses and any children living within their household, and agents acting on TOM CHESS T GROUP OF COMPANIES LTD's behalf are prohibited from contributing to any political candidate or political action committee relating to a Nigeria state or local political election. In addition, they are prohibited from organizing or hosting a political fundraiser for such candidates, being listed on political fundraising invitations as a host for such political candidates or raising money for such candidates. No TOM CHESS T GROUP OF COMPANIES LTD Company resources may be used for any Nigeria state or local political activities.
- If any TOM CHESS T GROUP OF COMPANIES LTD director or employee, as well as spouse or any children living within their household desires to contribute to a political candidate or participate in the above activities, they must seek prior approval from TOM CHESS T GROUP OF COMPANIES LTD's EXECUTIVE GROUP CHAIRMAN/CEO to confirm that no contributions or activities can be attributed to TOM CHESS T GROUP OF COMPANIES LTD in violation of any contractual or legal requirements. Violation of this policy may be grounds for termination.



AERIAL

DEVELOPMENT OF 20 BEDROOM NIGERIAN NAVY
EXECUTIVE GUEST HOUSE

EMPLOYMENT

3.1 FULL-TIME EMPLOYEES

Full-time employees are those who are normally scheduled to work 30 hours or more per week. All full-time employees are eligible to receive benefits as described in this handbook. There are three types of full-time employees:

- Exempt employees are classified as such if their job duties are exempt from the overtime provisions of federal and state wage and hour laws. Exempt employees are not eligible for overtime pay.
- Full Time Exempt/Overtime eligible - are eligible for overtime pay if the employees working on a specific contract and the client contract states overtime will be paid. The standard hours for these employees is 32 hours per week and any hours over 32 will be paid on a hourly rate and one pay period behind.
- Non-Exempt employees are eligible for overtime pay.

The Human Resources Department is responsible for determining exempt and non-exempt status of all jobs using criteria established by federal and state laws.

3.2 PART-TIME EMPLOYEES

Part-time employees are those who are normally scheduled to work and who do work less than 30 hours per week. Part-time employees may be assigned a work schedule in advance or may work on an as-needed basis. Part-time employees are eligible for some, but not all employee benefits described in this Handbook

3.3 TEMPORARY RESOURCES

Temporary resources are those who are employed for assignments which are normally periods of three (3) months or less, but which may be extended as needed. Temporary resources are not eligible for benefits except where mandated by law. Any resource that needs access to any TOM CHESS T GROUP OF COMPANIES LTD system needs to follow the required policy under the HR/IT Internet pages.

3.4 JOB DUTIES

When you begin your employment with TOM CHESS T GROUP OF COMPANIES LTD, your supervisor will explain your job responsibilities and the performance standards that are expected of you. Throughout your employment at TOM CHESS T GROUP OF COMPANIES LTD, your job responsibilities may change as the Company's needs and requirements change. From time to time, you may be asked to work on special projects or to assist with other work necessary or important to the operation of your department or the Company. Your cooperation and assistance in performing such additional work is expected and appreciated.

The Company reserves the right, at any time, with or without notice, to alter or change job responsibilities, reassign or transfer job positions, or assign additional job responsibilities.

3.5 TIMESHEETS

This operating procedure is issued to ensure that all employees' properly record hours worked on their timesheets. It is of the utmost importance for all employees to recognize that timesheets are used to support proper labor charging to TOM CHESS T GROUP OF COMPANIES LTD's clients and to document hours worked and paid or unpaid time off.

Time sheet procedures for all employees are as follows:

- Timesheets must be completed by all employees on a daily basis and include all hours worked.
- Timesheets must be submitted by 10:00 a.m. local time on the 15th and the last day of the month.
- Timesheets must be submitted electronically.
- The employee is the only person authorized to change his or her timesheet. There are no exceptions to this policy.
- Employees are not authorized to fill out another employee's timesheet.
- Employees are authorized to work only on projects assigned by their supervisors. Appropriate project charge numbers will be provided by employees' supervisors. Employees working on multiple projects must be sure to record actual time to proper charge numbers.

Supervisors are responsible for the following:

- Providing employees with accurate labor charge numbers;
- Reviewing timesheets

When in doubt about the timekeeping or labor charging procedures, employees should ask their supervisors or the Finance Department for further information before recording their time.

Supervisors will ensure that new employees are counseled adequately in Company timesheet procedures.

The Company may conduct periodic audits to ensure employees are complying with the procedures Outlined in this document

Audits will generally cover:

- Timely and accurate completion of timesheets.
- Methods employed in correcting timesheets.
- Employee awareness of the job number he/she is currently working on
- Employee awareness of operating procedures contained in this document.

It is the responsibility of each TOM CHESS T GROUP OF COMPANIES LTD employee and his or her supervisor to ensure timely submission of proper hours. Delays in timesheet submission will be treated seriously and may result in disciplinary action.

3.6 PERFORMANCE MANAGEMENT AND COMPENSATION PROGRAMS

In order to attract and retain a highly qualified and competent work force, TOM CHESS T GROUP OF COMPANIES LTD has instituted a performance management program to compensate employees in a fair and equitable manner based upon demonstrated job performance, and in accordance with its Equal Employment Opportunity Policy.

To help you perform your job to the best of your abilities, it is important that you receive feedback regarding good performance as well as receive appropriate suggestions for improvement when necessary. The goal of TOM CHESS T GROUP OF COMPANIES LTD's performance evaluations is to make you aware of your progress, identify areas which need improvement; set goals for future work performance, and help you with your professional development. All performance evaluations will be based on your overall performance, and will consider not only the performance of your job responsibilities, but also how you achieved your results. Performance Reviews are an excellent opportunity for you to mentor your team and plan for the coming year. It is a chance to reflect upon the prior year's challenges, evaluate achievements and set specific objectives for the coming year. It is required that all employees receive a performance review except Executive Consultants and Part-Time employees who work on an as needed basis.

A positive performance evaluation does not guarantee a promotion or an increase in salary. These are solely at the discretion of the Company and depend upon many factors in addition to performance.

After the review, you will be required to electronically acknowledge that your supervisor has presented it to you and discussed it with you and that you are aware of its contents.

In addition to the regular performance review described above, your supervisor may add additional goals and conduct written performance reviews throughout the year to advise you of new job duties and/or expectations, performance or disciplinary problems, or any special set of circumstances that warrants discussion.

3.7 PERSONNEL RECORDS

Personnel files are the property of TOM CHESS T GROUP OF COMPANIES LTD, but the employee may inspect certain documents in his/her personnel file in accordance with this policy and as provided by the provisions of the specific state law where his/her office / job site is located. The Company's general guidelines for reviewing files are described in its policy, although specific state laws may prevail. This inspection will be done in a Company office in the presence of a Company representative at a mutually convenient time. Any current employee who wishes to review his/her own personnel file should contact the Corporate Human Resources Department. With reasonable advance notice, they may review their own personnel file in a Company office and in the presence of an individual appointed to maintain the files.

The employee may not add to or remove from the personnel file any contents, nor is the employee permitted to make any photo copies of any contents (the taking of written notes is permitted). If requested, copies of documents in your file that you have previously signed will be provided. Access by the employee to his/her personnel files is limited to once in a six (6) month time period, unless

specifically authorized by EXECUTIVE GROUP CHAIRMAN/CEO. Access to personnel files will not be permitted to former employees. The Company will attempt to restrict disclosure of your personnel file to authorized individuals within the Company. Any request for information from personnel files must be directed to the Human Resources Department. Only the Human Resources Department is authorized to release information about current or former employees. Disclosure of personnel information to outside sources will be limited and must be accompanied by a signed release from the employee. However, the Company will comply with requests from authorized law enforcement or local, state or federal agencies conducting official investigations and as otherwise legally required (i.e. subpoena, court order, etc.)

The Human Resources Department may exclude from the examination by the employee any documents obtained through an agreement of confidentiality, such as letters of reference.

3.8 REFERENCE CHECKS

All inquiries regarding a current or former TOM CHESS T GROUP OF COMPANIES LTD employee must be referred to the Human Resources Department.

Should an employee receive a written request for a reference, he/she should refer the request to the Human Resources Department for handling. No TOM CHESS T GROUP OF COMPANIES LTD employee may issue a reference letter to any current or former employee or on their behalf to any third party, without the permission of the Human Resources Department.

Under no circumstances should any TOM CHESS T GROUP OF COMPANIES LTD employee release any information about any current or former TOM CHESS T GROUP OF COMPANIES LTD employee over the telephone. All telephone inquiries regarding any current or former employee of TOM CHESS T GROUP OF COMPANIES LTD must be referred to the Human Resources Department.

In response to an outside request for information regarding a current or former TOM CHESS T GROUP OF COMPANIES LTD employee, the Human Resources Department will furnish or verify only an employee's name, dates of employment, job title and department with a signed release which authorizes TOM CHESS T GROUP OF COMPANIES LTD in writing to furnish this information and also releases TOM CHESS T GROUP OF COMPANIES LTD from liability in connection with the furnishing of this information or TOM CHESS T GROUP OF COMPANIES LTD is required by law to furnish the information, otherwise TOM CHESS T GROUP OF COMPANIES LTD will only supply information that is required by law, subpoena or court order.

3.9 REPORTING PROCEDURES FOR PERSONNEL-RELATED ACTIONS

All personnel-related information must be submitted to the Human Resources Department for review prior to its implementation and/or distribution. The Human Resources Department will ensure compliance with corporate policy, review with the Corporate Legal Department if necessary, and obtain management approval for personnel-related actions prior to their implementation, including: Offers of employment, issuance or renewal of employment agreements, new hire information, changes in employment status, salary changes, relocations, performance based correspondence, and terminations.

The Human Resources Department is to be notified immediately upon any of the following events: work related injury or illness, leave of absence, resignations, intention to terminate employees or any

other personnel-related changes.

Education Verifications (degrees, licenses and registrations), and other pertinent new hire information must be received by the Human Resources Department no later than the employee's date of hire.

This policy applies to all personnel-related actions at all locations of the Company. The Vice President of Human Resources is responsible for implementing and administering this policy.

3.10 NOTIFICATION OF CHANGE

To keep necessary Company records up to date, it is extremely important that you notify the Human Resources Department of any changes in:

- Name and/or marital status (Note: A new Social Security card must be obtained when there is a change of a person's name in order to change the name in Payroll and Human Resources systems)
- Address
- Home or mobile telephone number
- Number of eligible dependents
- Deductions
- Person to contact in case of emergency

It is important to remember that any new dependents who are to be added to the healthcare, vision, and dental plans (due to birth or adoption of a child, marriage, spouse losing previous benefits coverage, etc.) must be sent in writing within 30 days of the event. Failure to do so within this time frame may result in coverage being denied until the next open enrollment period.

Employees may view information on compensation, benefits, and employment information.

Employees may also update personal information and emergency contacts. Employee Self Service is a completely web-based tool allowing employees to access this information from any web browser through a standard internet connection. This module is designed to be easily accessible with simple and straightforward navigation. All transactions are encrypted using SSL to protect employee information. Information regarding accessing Employee Self Service may be obtained from the Human Resources Department.

3.11 EMPLOYEES BIOGRAPHICAL CERTIFICATION

All full-time and part-time employees, temporary employees, independent contractors, and applicants are required to sign an authorization to allow TOM CHESS T GROUP OF COMPANIES LTD to verify credentials listed on applications and resumes (including education, past employment, professional licenses, etc.). In some situations additional verification may be required after the commencement of employment. A resume and employee profile must be submitted to the Human Resources Department along with all required new hire paperwork. Your resume will be forwarded to the Marketing Department for a biography to be prepared for use in proposals and may be

forwarded to TOM CHESS T GROUP OF COMPANIES LTD's clients or prospective clients. If any information is determined to be inaccurate or falsified, TOM CHESS T GROUP OF COMPANIES LTD may, at its discretion, terminate your employment.

Employees are responsible for keeping the information in their respective biography current and accurate. If you obtain a new credential please be sure to complete the **Verify a Credential form** on the HR Intranet page

On an annual periodic basis employees will be asked to review and verify the information in their biographies based on changing events such as a new assignment, new degree, expired registration or proposal submittal. Essentially, any time there is a change in the information (new or modified) an employee biography must be updated in Vision CRM. Accurate and complete TOM CHESS T GROUP OF COMPANIES LTD employee biographies are critical to the on-going success of TOM CHESS T GROUP OF COMPANIES LTD.

Employees are asked to be cooperative in updating their bios and provide any information requested to maintain their bios in a timely manner. The information in any employee biography may be edited to best meet the sales and marketing goals of TOM CHESS T GROUP OF COMPANIES LTD. It should be noted that TOM CHESS T GROUP OF COMPANIES LTD biographies are the property of TOM CHESS T GROUP OF COMPANIES LTD, not the individual. The material included in the biography is subject to review and approval of TOM CHESS T GROUP OF COMPANIES LTD management.

3.12 PRE-AND POST EMPLOYMENT SCREENING

During the pre-employment process applicants may undergo various screening processes before they can begin employment. This may include contact with previous employers and academic institutions. Candidates may also be asked to submit to drug testing, medical examinations, criminal background checks, fingerprinting, credit checks and/or investigative consumer reports, depending on the client requirements and/or the position you are being hired for.

Some of these screening processes will take place post offer and pre-employment. Some testing may be required as a condition of continued employment or at the time of transfer or promotion, based on the positions being assigned.

Falsification of any employment document (including, but not limited to, an application or resume) may be cause for discharge of employment.



COMPENSATION

4.1 WORKWEEK

For purposes of timesheets we operate on a workweek that begins at 12:01 a.m. on Sunday and continues for 168 hours until 12:00 Midnight Saturday. The usual work schedule is a standard 40 hours Monday through Friday schedule. Offices are normally closed on Saturdays, Sundays, and designated holidays

Each location, however, may modify its regular schedule to accommodate its client's needs and hours of operation. The workday for employees in the field is usually dictated by the requirement of the project where the employee is assigned, and is subject to change as the location or client changes.

4.2 PAYMENTS OF WAGES

Payday is on the last working day of each month. If a regular payday falls on a weekend or company-recognized holiday, employees will be paid on the preceding workday. Pay for a full-time salaried employee is always current. Pay for part-time employees, overtime, and any leave without pay is a pay period behind due to the need to collect and process timesheet information to determine actual pay.

If the Company receives a request or an order to garnish an employee's wages, the employee will automatically be sent a copy of the request or order.

4.3 EXEMPT EMPLOYEES PAY

It is TOM CHESS T GROUP OF COMPANIES LTD's policy to comply with the provisions of the Labor Standards and federal wage laws. In accordance with these laws, and except as permitted by these laws, exempt employees are paid on a salaried basis, regardless of the number of hours they work in a given workweek. However, exempt employees need not be paid for any workweek in which they perform no services for the Company. It is Company policy to make deductions from the weekly salary of an exempt employee absent from work only as described below:

- When an exempt employee is absent from work for a full day for personal reasons, personal sickness, or disability and has no Paid Time off (PTO) available for the absence, the employee's salary may be reduced for each full day of absence.
- During an exempt employee's first and last weeks of employment, the employee will be paid only for the days he or she actually works.
- When an exempt employee is suspended for a full day or more for violation of one or more workplace conduct rules, the employee's salary will be reduced for each full day of suspension.
- When an Exempt employee is suspended for any period of time for infractions of safety rules of major significance, the employee's salary will be reduced in accordance with the period of suspension.

COMPLAINT PROCEDURE

An exempt employee who believes that an improper deduction has been made from his or her salary should report the deduction immediately to the Human Resources Department. The Human

Resources Department will investigate the employee's complaint, and if improper deduction is found to have been made, the employee will be promptly reimbursed the improper deduction. Employees will not be subject to retaliation for having made a complaint under this policy.

4.4 PAY FOR MANDATORY MEETINGS/TRAINING

The Company will pay non-exempt employees for their attendance at meetings, lectures and training programs under the following conditions:

- Attendance is mandatory.
- The meeting, course or lecture is directly related to the employee's job.

4.5 OVERTIME

NON-EXEMPT

Depending on the Company's work needs, employees may be required to work overtime. For purposes of determining which hours constitute overtime, only actual hours worked in a given workday or workweek will be counted. Paid Time Off (PTO) time and Company holidays will be counted as hours worked; however, all overtime work must be previously authorized by a supervisor. The Company provides compensation for all overtime hours worked by non-exempt employees in accordance with state and federal laws.

EXEMPT EMPLOYEES

Exempt employees may often have to work hours beyond their normal schedules as work demands require. No overtime compensation will be paid to exempt employees, except when they work over 40 hours per week

4.6 ADVANCES

The Company does not permit advances against paychecks or against Paid Time Off accrual. Travel advances are not issued unless an employee is traveling internationally and approved by the Group President.

4.7 WORKING FROM HOME

TOM CHESS T GROUP OF COMPANIES LTD depends heavily upon its employees, it is important that employees attend work as scheduled.

Dependability and attendance, and a commitment to do the job right are essential at all times. As such, employees are expected at work on all scheduled workdays and during all scheduled work hours in the office.

Under no circumstances are employees permitted to work at home unless they have the approval of the Department Head. Anyone working from home on a permanent basis will need prior approval from the Executive Group Chairman/CEO. Any attempt to work from home without proper approvals, may result in disciplinary action.

EMPLOYEE BENEFITS

5.1 BENEFITS

Eligible employees of TOM CHESS T GROUP OF COMPANIES LTD are provided with a wide range of benefits. A number of the programs are mandated by law and apply to all employees regardless of their employment classification. These benefits may include Social Security, workers compensation, and unemployment compensation insurance.

All Full-Time employees (employees who work on average 30 or more hours per week) are eligible for Company provided benefits. Unless stated elsewhere, all benefits begin on the first day of the month following the date of employment.

5.2 DISCLAIMER

The Company has established a variety of employee benefit programs designed to assist you and your eligible dependents in meeting the financial burdens that may result from illness and disability, and to help you plan for retirement. This portion of the Employee Handbook contains a very general description of the benefits to which you may be entitled as an employee of the Company. Please understand that this general explanation is not intended to, and does not, provide you with all the details on these benefits. Therefore, this Handbook does not change or otherwise interpret the terms of the official plan documents. Your rights can be determined only by referring to the full text of the official plan documents and the Summary Plan Descriptions, which are available for your examination on the TOM CHESS T GROUP OF COMPANIES LTD Intranet. Any employee not able to access this information may contact Human Resources Department directly. To the extent that any of the information contained in this Handbook is inconsistent with the official plan documents, the provisions of the official documents will govern in all cases.

Please note that nothing contained in the benefit plans described herein shall be held or construed to create a promise of employment or future benefits, or a binding contract between the Company and its employees, retirees or their dependents, for benefits or for any other purpose. All employees shall remain subject to discharge or discipline to the same extent as if these plans had not been put into effect.

As in the past, TOM CHESS T GROUP OF COMPANIES LTD reserves the right, in its sole and absolute discretion, to amend, modify or terminate, in whole or in part, any or all of the provisions of the benefit plans described herein, including any health benefits that may be extended to retirees and their dependents. Further, the Company reserves the exclusive right, power and authority, in its sole and absolute discretion, to administer, apply and interpret the benefit plans described herein, and to decide all matters arising in connection with the operation or administration of such plans.

For more complete information regarding any of our benefit programs, please refer to the Summary Plan Descriptions which may be found on the HR TOM CHESS T GROUP OF COMPANIES LTD Intranet page.

5.3 FLEXIBLE BENEFITS PACKAGE

Plan Documents, Benefit Forms, Plan Brochures, and General Information is available through the TOM CHESS T GROUP OF COMPANIES LTD Intranet. Any employee not able to access this information may contact Human Resources Department directly.

As an innovative company, we sought an innovative solution to the question of how we provide benefits. Flexible benefits are a departure from the idea that one benefit plan is right for all people. TOM CHESS T GROUP OF COMPANIES LTD is proud to be a forward-thinking company offering employees benefit choices. TOM CHESS T GROUP OF COMPANIES LTD offers you a choice in your benefits because only you know what coverage's are right for you.

Through your choices and the assistance TOM CHESS T GROUP OF COMPANIES LTD provides, you may obtain valuable protection for yourself and your family.

TOM CHESS T GROUP OF COMPANIES LTD has a separate brochure explaining the benefits of our Flexible Benefits Plan.

5.4 HOLIDAYS

All active full-time employees are entitled to certain holidays with pay each year. The following holidays are observed at all Nigeria TOM CHESS T GROUP OF COMPANIES LTD locations: **New Year's Day, Good Friday, Easter Monday, Workers day, Salah, Democracy day, Eid El Kabir, Independence Day, Christmas Day and Boxing Day**

If any of these holidays fall on a Saturday, the holiday will be observed on the preceding Friday; if any of the holidays fall on a Sunday, the holiday will be observed on the following Monday.

Employees assigned to work at a client's office or at a project job site may have a holiday policy different from the above as dictated by the client. In these situations the established client holiday will apply.

In the event that a client has a holiday on a normal work day for TOM CHESS T GROUP OF COMPANIES LTD, the employee must go to the closest TOM CHESS T GROUP OF COMPANIES LTD office or work from home as it is not a holiday, but a work day for that employee.

In the event a non-exempt and/or prevailing wage employee is scheduled to work on a TOM CHESS T GROUP OF COMPANIES LTD holiday, they will be paid for the holiday and any hours worked.

Employees on Paid Time Off when a holiday occurs will receive the holiday pay, and the holiday will not be charged as Paid Time Off. Employees on short term disability, long term disability, termination, workers compensation will not receive pay for a holiday.

The last day actually worked is the effective termination date for employees terminating service with the Company. Those individuals will not be permitted to use Paid Time Off days after that date in order to receive holiday pay.

5.5 PAID TIME OFF (PTO) DAYS

PTO provides **full-time employees** with the flexibility to use their time off to meet personal needs while recognizing their individual responsibility to manage their paid time off.

Employees will accumulate a specified amount of PTO each month that may be managed and used at the employee's discretion. TOM CHESS T GROUP OF COMPANIES LTD may require employees to use any unused PTO during disability, family medical leave, or any other leave of absence. The amount of PTO earned will depend on the employee's length of service with TOM CHESS T GROUP OF COMPANIES LTD.

PTO does not replace TOM CHESS T GROUP OF COMPANIES LTD's holiday schedule. Employees will have seven (7) designated paid holidays each year.

ELIGIBILITY

Full-time employees are eligible to take and accrue PTO days based on their length of service with TOM CHESS T GROUP OF COMPANIES LTD, measured from the date of hire. For purposes of this policy, the year in which an employee joins TOM CHESS T GROUP OF COMPANIES LTD is the employee's first calendar year of service.

Full-time employees accrue PTO days on a monthly basis at the rate of 1/12 of their annual allotment for the year. PTO should be used in the year in which it accrues. Accrued, unused PTO will be capped in accordance with this policy. Employees may use PTO in advance of it being accrued within the same calendar year, if approved by their supervisor.

Full-time employees will be eligible for PTO days based on the following schedule:

<i>Calendar Years of Service:</i>	<i>Maximum Annual PTO Allotment</i>
Hire date through five (5) calendar years	15 days
Six (6) to 15 calendar years	20 days
16 or more calendar years	25 days

Employees who are on paid PTO continue to accrue PTO, subject to the terms of this policy.

DEPOSITS INTO LEAVE ACCOUNT

PTO accruals begin during the employee's first day of employment. The amount of PTO accrued each year is based on the length of service and accrues at a rate of 1/12 the employee's annual allotment per month. PTO is accrued as the employee works.

Once an employee reaches the maximum, he or she may still accrue and use PTO allotted during the calendar year, but cannot carry over more than 160 hours into the following calendar year. Any PTO hours above 160 hours are lost if it is not used and shall not carry forward into the following calendar year (Applicable laws apply).

PTO SCHEDULING, ADVANCES, HOLIDAYS, AND LEAVES

The employee's supervisor must approve PTO requests in advance, and employees should make their PTO requests as far in advance as possible. Based upon department needs, TOM CHESS T GROUP OF COMPANIES LTD will attempt to grant an employee the PTO dates him or her requests.

Based on the prior approval of the employee's supervisor, an employee may receive an advance of the given year's future accrual of PTO time. Employees may not take an advance on a subsequent year's accrual of PTO time. If an employee has used PTO days before they have been accrued and then leaves the employment of TOM CHESS T GROUP OF COMPANIES LTD, a deduction will be taken from the employee's last pay to repay the PTO days that were used prior to accrual (applicable state laws apply).

Employees, who request any kind of unpaid leave, including a family care or medical leave pursuant to TOM CHESS T GROUP OF COMPANIES LTD's leave policies, generally must first apply any accrued PTO during the unpaid leave for the first five days, subject to applicable law.

No PTO accrues during an unpaid leave of absence or suspension. However, employees on leaves shall continue to accrue PTO only when paid PTO is being substituted for unpaid leave and only if the Employee would otherwise be entitled to such accrual. If the employee returns to work from the approved leave, the employee shall receive, upon return to work, PTO that would have otherwise accrued during the unpaid portion of the leave, subject to the maximum cap and other terms of this Policy. If the employee does not return to work after the approved leave, he or she will not be entitled to PTO accruals for the unpaid portion of the leave.

PAYMENT OF PTO AT TERMINATION

Upon termination, the employee will be paid all accrued but unused PTO at the employee's base rate of pay at the time the PTO was earned in accordance with LIFO ("Last In, First Out") through the point of his or her termination. Where permissible by state law, if an employee has utilized more PTO than the employee accrued, an adjustment will be made in the final paycheck. If there are insufficient funds available to make this adjustment, the employee will be required to reimburse TOM CHESS T GROUP OF COMPANIES LTD for any difference.

In addition, where permissible by state law, employees leaving TOM CHESS T GROUP OF COMPANIES LTD due to voluntary resignation, retirement or dismissal will not be eligible to be paid for their accumulated but unused PTO days except in the following circumstances:

- Upon resignation or retirement, if the employee provides the Company with at least two (2) weeks' notice in writing of the resignation or retirement date; or
- Upon dismissal, when the dismissal is not related to misconduct or job performance by the employee, as determined by TOM CHESS T GROUP OF COMPANIES LTD.

DEFINITION

Paid Time Off (PTO): Vacation, illness, caring for any individual related by blood or affinity whose close association with the employee is the equivalent of a family relationship, school activities, medical / dental appointments, leave, domestic violence, sexual assault, stalking, personal safety concerns, personal business, or emergencies

PAID SICK AND SAFE TIME POLICY FOR EMPLOYEES NOT ELIGIBLE FOR PTO DAYS

TOM CHESS T GROUP OF COMPANIES LTD employees who are **not full-time** do not qualify for TOM CHESS T GROUP OF COMPANIES LTD's PTO days. However, TOM CHESS T GROUP OF COMPANIES LTD recognizes that employees may need time away from work. This time away may be due to various reasons, including for the employee's own illness, a family member's illness, or if the employee is a victim of domestic violence, sexual assault or stalking. As a result, TOM CHESS T GROUP OF COMPANIES LTD provides sick and safe time to employees each year in recognition of that need and in compliance with the law. Only employees who are not eligible to receive PTO days, which can already be used for the foregoing purposes, qualify under this policy.

ELIGIBILITY

All employees not eligible for TOM CHESS T GROUP OF COMPANIES LTD PTO days will be eligible to accrue paid sick and safe time days from TOM CHESS T GROUP OF COMPANIES LTD's implementation of this policy or for new employees, the start of employment. However, an employee must have completed 90 days of employment with TOM CHESS T GROUP OF COMPANIES LTD before using any such sick and safe time.

DEFINITIONS

Family member: The employee's current spouse, child or individual for which the employee stands in loco parentis, legal guardian or ward, parent, parent-in-law, person who stood in loco parentis status when the employee was a minor child, sibling, grandparent, or grandchild. An employee's registered domestic partner (as defined by state or local law), as well as the child and parent of a registered domestic partner, are also considered an employee's family member. These familial relationships include not only biological relationships, but also relationships resulting from adoption, step-relationships, and foster care relationships. The definition of child applies irrespective a child's age or dependency status. A family member also includes a "designated person."

Designated person: If an employee does not have a spouse or registered domestic partner, the employee may designate one person as to whom the employee wishes to use sick and safe time to aid or care for that person. Designation of this person must be done within 10 days of the date the employee begins accruing sick and safe time. Thereafter, TOM CHESS T GROUP OF COMPANIES LTD will provide an opportunity to re-designate a designated person on an annual basis.

Basic rate of pay: Under this policy, the basic rate of pay is the equivalent of the employee's hourly wage. For employees who have different hourly rates of pay or who are paid by commission or piece rate or who are nonexempt salaried employees, the sick and safe time basic rate of pay will be calculated in accordance with applicable law.

Safe time: Employees may take safe time if the employee is a victim of domestic violence, sexual assault or stalking and time off is needed to attend to safety planning or other actions to assist the employee, such as judicial assistance, medical attention, counseling, etc.

Sick time: Employees may take sick time for themselves and their eligible family members: (a) for diagnosis, care or treatment of an existing medical condition; (b) for preventative care; (c) to attend a medical or dental appointment; (d) to attend to or provide care for a family member with a mental or physical illness; and/or (e) to recover or recuperate from an injury or health condition.

Sick & Safe Time Accrual Schedule and Carryover

From the start of employment, all employees not eligible for TOM CHESS T GROUP OF COMPANIES LTD PTO will accrue one (1) hour of paid sick and safe time for every 30 hours worked, up to a maximum cap of 72 hours. Sick and safe time accrues in one (1) hour increments only; there is no accrual of a fraction of a sick and safe time hour. The number of hours a non-exempt employee is deemed to work each week will be based on time records and includes all hours worked. The number of hours an exempt employee is deemed to work each week will be presumed to be 40 hours per week unless the employee is absent from work a full workweek. Once an employee hits the sick and safe time accrual cap, the employee will not accrue further sick and safe time until the employee's sick and safe time accrual balance falls below the cap. Any accrued, but unused, sick and safe time will carry over from year to year.

Employees cannot cash out unused paid sick and safe time at the end of each year.

Requesting Paid Sick & Safe Time.

Paid sick and safe time may be used in increments of one (1) hour or greater to cover all or just part of a work day. Paid sick and safe time benefits will be based on the employee's basic rate of pay, which will be calculated in accordance with applicable law. If the need for paid sick or safe time use is foreseeable, an employee must provide reasonable advance notice - either orally or in writing - to their supervisor of an absence from work. If the use of paid sick and safe time is unforeseeable, an employee must provide notice - either orally or in writing - to their supervisor of the need to use paid sick and safe time as soon as practicable. In all circumstances, an employee is responsible for specifying that the time off is for paid sick or safe time reasons, so that the absence may be designated as a paid sick and safe time absence. Failure to obtain approval as soon as possible after determining the need to take paid sick and safe time may result in discipline.

Separation from Employment & Rehire

An employee who separates from employment with the Company will not be paid out unused paid sick and safe time at separation. Any California employee who is rehired within one (1) year of his/her separation from employment, will receive back all accrued, but unused, paid sick and safe time the employee had available at the time of separation and will be eligible to use that time as of the date of rehire.

Discrimination & Retaliation Prohibited.

TOM CHESS T GROUP OF COMPANIES LTD prohibits discrimination and/or retaliation against employees who request or use paid sick and safe time for authorized circumstances protected by law or for making a complaint or informing a person about a suspected violation of the law. Likewise, the Company prohibits discrimination and/or retaliation for cooperating with officials in investigating claimed violations of the law, cooperating or participating in any investigation, administrative hearing or judicial action regarding an alleged violation, opposing any policy or practice that is prohibited by the law or informing any person of his or her potential rights under the law

5.6 TUITION REIMBURSEMENT PROGRAM POLICY

TUITION REIMBURSEMENT REQUEST

TOM CHESS T GROUP OF COMPANIES LTD supports the professional development of its employees through formal education and achievement of professional memberships where there is the opportunity to improve or maintain job performance, or to satisfy client expectations and requirements. Any TOM CHESS T GROUP OF COMPANIES LTD employee that participates in the tuition reimbursement program will be awarded funds as outlined below.

ELIGIBILITY AND APPROVAL

The policy applies to all full-time employees with six (6) or more months of continuous employment, subject to prior written approval from the employee's Supervisor and Human Resources Manager. The acceptance of the employee to enter into a Tuition Reimbursement Agreement is required before any financial assistance will be given.

REIMBURSEMENT AMOUNT

The maximum amount of tuition reimbursement given to the employee will be N1, 000,000.00 per Calendar year to cover course fees and other relevant training materials (e.g., books, revision, courses, etc.).

Note: Any additional fees associated with re-sits will not be funded by TOM CHESS T GROUP OF COMPANIES LTD.

REPAYMENT CONDITIONS

Unsuccessful Completion: Should any training not be completed or qualification not attained, TOM CHESS T GROUP OF COMPANIES LTD will claim back the full amount of the tuition reimbursement from the employee.

Resignation or Termination: Should an employee resign or be terminated for cause from TOM CHESS T GROUP OF COMPANIES LTD before completing the training for which tuition reimbursement was received, TOM CHESS T GROUP OF COMPANIES LTD will, where permissible by law, make an adjustment in the final paycheck. If there are insufficient funds available to make this adjustment, the employee will be required to reimburse TOM CHESS T GROUP OF COMPANIES LTD for any difference.

Employees who resign from TOM CHESS T GROUP OF COMPANIES LTD within 24-months of receipt of the award/qualification will be required to repay 100% of the total tuition reimbursement. No repayment will be required from anyone leaving after the 24-month period following receipt of the award/qualification.

TUITION REIMBURSEMENT REQUEST PROCESS

All applications for tuition reimbursement must be submitted by the employee to his or her Supervisor and Human Resources manager for approval. These actions should occur prior to the scheduled commencement of the course in order for the expenses to be eligible for reimbursement. Application forms may be obtained from the HR intranet page. In order to be considered for tuition reimbursement, the individual must be in good standing and must be an active, eligible employee at the beginning and at the end of the academic period.

REQUIREMENTS

Courses or degree programs selected by the employee must either provide the employee with the opportunity to improve or maintain job performance or to satisfy client expectations and requirements by being related to his or her area of employment. Courses or degree programs must be offered by recognized accredited educational institutions such as colleges, universities, or organizations (e.g., engineering societies, secretarial schools, or society of professional management consultants).

COURSE COMPLETION

The reimbursement will be made within thirty (30) days of submitting an approved expense report, after successful completion of the course with a paid receipt of all tuition costs, plus an official transcript of the actual grade received and verification from the company. TOM CHESS T GROUP OF COMPANIES LTD reserves the right to confirm successful course completion and level of achievement

with all accredited educational institutions previous to reimbursement being made.

5.7 MEMBERSHIP IN PROFESSIONAL SOCIETIES

The Company will reimburse full-time employees 100% of the cost for your professional license in your home state. Your home state is determined by the location of the office to which you are assigned. Licensing fees for states other than your home state would be reimbursed if the Company requested you to maintain the license for business purposes.

The Company will also reimburse 100% of the costs for professional society dues as approved by Human Resources Manager. Professional societies are defined as those which limit membership to qualified individuals, have a code of ethics or other standards, and enforce that code through disciplinary actions against members who violate the code.

Other professional and semi-professional organizations will be considered for reimbursement if they contribute to your professional growth and provide opportunities for business development.

Request for reimbursement should be submitted on expense forms, with receipts or other evidence of expenditure attached. Reimbursements above N20, 000.00 must be approved in advance.

When you attend professional society meetings on your own time, meal expenses are limited to N20, 000.00 per meeting. All costs for attending a society meeting at the Company's request will be fully reimbursed

5.8 PROFESSIONAL CERTIFICATION INCENTIVE PROGRAM POLICY

ELIGIBILITY AND APPROVAL

The policy applies to all full-time employees with six (6) or more months of continuous employment, subject to **prior written approval** from the employee's Supervisor and Human Resources Manager. The application/approval form can be found on the HR Intranet page. When the employee first achieves any of the below mentioned certifications they shall receive a one (1) time bonus which will be reflected in the next pay period after verification of the certification by the Human Resources Department.

Professional Certification Incentive Program Process:

Copies of the certification and/or license will be required and must be submitted to the Human Resources Department for payment. Payment will be processed after verification of the certification by the Human Resources Department.

If prior approval has been given, TOM CHESS T GROUP OF COMPANIES LTD will reimburse an employee one (1) time only for the cost of the application fee and any review course taken in order to prepare for a professional exam upon successful completion of the course.

All time devoted to the course (s) and associated coursework for Tuition Reimbursement and a Professional Certification must be outside of normal working hours and will not be considered hours worked by TOM CHESS T GROUP OF COMPANIES LTD.

Please Note: Any reimbursement made directly or indirectly to an employee may be considered

taxable income. Employees should check with their tax advisor for more information related to their particular situation.

5.9 EMPLOYEE RECOMMENDATION & REFERRAL PROGRAM POLICY

TOM CHESS T GROUP OF COMPANIES LTD recognizes that word of mouth referrals can be an effective way to attract qualified future employees. TOM CHESS T GROUP OF COMPANIES LTD's employee referral program is designed to reward TOM CHESS T GROUP OF COMPANIES LTD employees who have referred successful candidates.

If the candidate has applied online or otherwise within the previous six (6) months, no referral bonus will be paid.

A recommended/referred candidate must be hired within six (6) months of the original referral for the referrer (TOM CHESS T GROUP OF COMPANIES LTD employee) to be eligible for the referral bonus.

The employee recommendation/referral form must be submitted along with the resume to recruiting before the initial interview. If this does not occur, the referral bonus will not be paid out.

The recommendation/referral must apply to an existing open **full time billable position**, not a position specifically created for the applicant.

The recommended/referred candidate must have been interviewed by TOM CHESS T GROUP OF COMPANIES LTD's management team.

After the new employee has been employed by TOM CHESS T GROUP OF COMPANIES LTD for 90 days, the referral bonus is paid to the referrer through the payroll system (after probationary period and minus applicable taxes).

- **N20, 000.00 Referral Bonus** for all referred employees with an annual salary below N2, 000,000.00
- **N50, 000.00 Referral Bonus** for all referred employees with an annual salary above N2, 000,000.00

Employees are not eligible for referral bonuses if the employee independently sourced the referred candidate via social networking, job boards, and internet sites.

Referral bonus does not apply if the referral has been an employee at TOM CHESS T GROUP OF COMPANIES LTD within the last one (1) year. All referred resumes must be submitted electronically through TOM CHESS T GROUP OF COMPANIES LTD e-mail along with the e-mail trail from the referred candidate (hard copies will not be accepted).

In cases where a CV is provided by two different employees, the payment will be paid to whoever provided the referral first via e-mail.

The following are not eligible to participate:

- The direct manager of the referred candidate,
- Human Resources Manager and above, and all TOM CHESS T GROUP OF COMPANIES LTD recruiters.

5.10 RECREATIONAL ACTIVITIES AND PROGRAMS

The Company and its insurers will not be liable for the payment of any damages, including without limitation workers' compensation benefits, for any injury that arises out of an employee's voluntary participation in any off-duty recreational, social, or athletic activity that is not part of the employee's work-related duties.

5.11 WORKERS' COMPENSATION

The Company, in accordance with state law, provides insurance coverage for employees in case of work-related injury.

To ensure that you receive any workers' compensation benefits to which you may be entitled, you will need to:

- Seek medical treatment immediately.
- Report any work-related injury to your supervisor
- Complete a written Employee's Claim Form and returns it to the Human Resources Department.
- Seek follow-up care, if required.
- Provide the Company with a certification from your health care provider regarding the need for workers' compensation disability leave and your ability to return to work from the leave.

5.12 POLICY ON BENEFITS FOR SPOUSES

TOM CHESS T GROUP OF COMPANIES LTD recognizes the status of "Spouse" under its employment policies and practices, as well as under its benefits plans in accordance with applicable federal, state, and local laws. This means that employees receive certain rights and benefits with respect to their domestic partners and may have certain income and payroll tax consequences as a result.

DEFINITION

To qualify under TOM CHESS T GROUP OF COMPANIES LTD's Spouse Policy, employees must be:

- At least 18 years old;
- Married; and
- Working full-time

For an individual to be covered as an eligible employee's spouse, that individual must be:

- In a marriage with the employee;
- At least 18 years old;
- Competent to enter into a legally binding contract under the law of the state in which that individual resides.
- File a declaration of marriage relationship with a state or local registry in any jurisdiction or fill out TOM CHESS T GROUP OF COMPANIES LTD's Statement of marriage.

TERMINATION OF DOMESTIC PARTNERSHIP

To terminate a spouse's recognition as such by the Company and coverage under benefits plans sponsored by the Company, an employee must notify the Human Resources Department in writing of the termination of the employee's marriage. The employee is responsible to provide this notification within 30 days after the employee or the domestic partner cease to meet all of the criteria noted above. As noted previously, an employee's failure to notify the Human Resources Department within 30 days of an event causing an individual to cease qualifying as the employee's domestic partner spouse may result in termination of the dependent's health coverage allowance, retroactive to the date eligibility was lost, and may result in a civil action to recover any losses.

REGISTRATION OF SUBSEQUENT SPOUSE

After an employee has terminated an individual as the employee's domestic partner as described above, the employee must wait at least six (6) months from the date of that termination before requesting recognition of another domestic partner, except in the following cases:

- Within 30 days after giving notice of termination of a spouse's eligibility, the employee requests recognition of the same individual as his or her spouse.
- Termination of the spouse's coverage was due to the death of the spouse.

COVERAGE FOR SPOUSE UNDER TOM CHESS T GROUP OF COMPANIES LTD'S FLEXIBLE BENEFITS PLAN

The cost of the coverage an employer provides to an employee's spouse is excluded from the employee's income; the same coverage provided to an employee's spouse will cause the employee to have additional taxable income.

If an employee who has requested recognition of a spouse elects to opt out of medical coverage, the employee will receive the same opt-out credit as is stated in the Flexible Benefits Plan document with respect to a married employee who opts out.



5.13 HEALTH INSURANCE POLICY

TOM CHESS T GROUP OF COMPANIES LTD's Benefits Plan uses medical records information about you and your covered spouses and dependents only for paying claims and other legally permissible purposes. The Plan's privacy policies and procedures are designed to satisfy the applicable requirements of the National Health Insurance Scheme (NHIS) regulations



6. EXPENSES

6.1 CAPITAL EXPENDITURES

Any employee wishing to make a capital expenditure must obtain the approval of his or her supervisor, Human Resources Manager and EXECUTIVE GROUP CHAIRMAN/CEO. All items (furniture, equipment, etc.) must be ordered and invoiced through TOM CHESS T GROUP OF COMPANIES LTD's preferred vendor relationships in accordance with established policies.

6.2 PURCHASES/LEASES OF COMPUTER HARDWARE AND SOFTWARE

Purchases or leases of computer hardware or software must be submitted on an IT Purchase Request form and approved by the Company's IT Department and the EXECUTIVE GROUP CHAIRMAN/CEO

6.3 TRAVEL/ENTERTAINMENT EXPENSES POLICY

Employees shall use good business judgment when incurring travel and other expenses in support of

TOM CHESS T GROUP OF COMPANIES LTD business and reasonable efforts should be made to minimize these costs. Expenses not in compliance with this policy may be deemed non-reimbursable.

CORPORATE CARD

Eligible TOM CHESS T GROUP OF COMPANIES LTD employees may be issued a corporate card. The corporate card is to be used for business reimbursable expenses only and may not be used for personal reasons of any nature. It will be your responsibility to pay these charges directly and to submit an expense report for reimbursement.

AUTHORIZATION PROCEDURES

All Travel: Employees are responsible for obtaining supervisory approval prior to booking business travel arrangements. Teleconferencing or videoconferencing should be considered as an alternative to face to face business meetings when it is more cost-effective and facilitates business objectives adequately.

Training Related Travel (Conferences, Seminars and Conventions): All costs related to conferences, seminars, and conventions must be approved in advance by the EXECUTIVE GROUP CHAIRMAN/CEO, including a list of all attendees and an estimate of all costs.

TRAVEL RESERVATIONS

TOM CHESS T GROUP OF COMPANIES LTD engages approved corporate travel agency. TOM CHESS T GROUP OF COMPANIES LTD will not reimburse any airfare that is not booked through company approved corporate travel agency unless prior approval is obtained from the EXECUTIVE GROUP CHAIRMAN/CEO.

All air travel, ground transportation (car rental, rail, etc.) and lodging, including en-route changes should be booked through company approved corporate travel agencies. All reservations for approved business travel should be made as early as possible to take advantage of advance purchase discounts.

EMERGENCY TRAVEL ASSISTANCE OR EN-ROUTE CHANGES

Travelers within should contact company approved corporate travel agency for all emergency travel assistance and en-route itinerary travel changes. Due to the additional expense incurred, non-emergency en-route changes are strongly discouraged and must be justified in writing to the employee's supervisor.

AIR-TRAVEL

Class of Service: The standard class for domestic air travel is coach and the standard class for international is coach plus. Business class may be used by EXECUTIVE GROUP CHAIRMAN/CEO on any flight over five (5) hours of flight time (if business class is not available the alternative is coach or coach plus for international).

Upgrades: Upgrades at the expense of TOM CHESS T GROUP OF COMPANIES LTD are prohibited. Travelers may upgrade at their own expense. If the person is billable and the terms of the specific contract define a specific class, that class may be used.

Airline Frequent Flyer Programs: Employees may retain frequent flyer program mileage and benefits. Travelers are prohibited from allowing participation in such programs to influence their vendor selection.

Boarding Passes: Your boarding passes or image of boarding passes should be included with your expense report to show that the purchased airline ticket was used.

Cancellation of Travel Plans (Unused/Voiced Airline Tickets): Travelers should contact company approved corporate travel agency immediately should travel plans change or require cancellations.

Personal Travel: Personal travel arrangements may be made through company approved corporate travel agency using a personal credit card and may not be charged to TOM CHESS T GROUP OF COMPANIES LTD. Personal travel included as part of a business trip must be approved by an employee's supervisor in advance of the travel

Personal travel for employees or their dependents may not be charged to TOM CHESS T GROUP OF COMPANIES LTD. The only exception to this policy will be approved relocation expenses.

SPOUSE OR COMPANION TRAVEL

In general, TOM CHESS T GROUP OF COMPANIES LTD will not reimburse employees for spouse or companion related travel and entertainment expenses. Spouse or companion travel or entertainment expenses incurred for legitimate business reasons will be reimbursed only when prior written approval has been obtained from the Chief Financial Officer.

Employees are permitted to incorporate personal travel with business travel providing:

- that such business-personal travel is authorized,
- that such personal travel costs are borne by the employee,
- that such personal travel does not interfere with the performance of Company business during the trip,
- That the personal travel is on the employee's free days or during Paid Time Off.

RAIL TRAVEL

Rail travel should be considered as an alternative to air travel or car rental if it costs less and meets scheduling requirements. The standard class for rail travel is unreserved class on regular trains.

AUTOMOBILE RENTAL

Reserve intermediate / mid-sized cars when less than three people are traveling together

When three or more people are traveling together, you may reserve a full-size car. Any exceptions must be approved by the EXECUTIVE GROUP CHAIRMAN/CEO.

Use of ride sharing services is highly recommended for transportation to or from the airport and your home.

Employee members traveling together should share rental cars whenever possible.

Travelers should refuse the prepaid fueling option at the rental counter, unless it is the most economical fueling option.

The rental contract should indicate your name first, followed by "TOM CHESS T GROUP OF COMPANIES LTD." to introduce the Company's liability and collision insurance policies. It is not necessary to purchase liability and collision insurance from the rental company. (Note: Employees who rent a car while traveling internationally should purchase the physical damage waiver from the rental car company. Liability coverage for bodily injury or property damage to third parties is compulsory and generally included in the daily rental cost.)

Damage/Accidents: Travelers are required to inspect rental cars for damage (dents, scratches, etc.) prior to exiting the agency's lot. Any damage found should be noted on the rental contract before personal travel for employees or their dependents may not be charged to TOM CHESS T GROUP OF COMPANIES LTD. The only exception to this policy will be approved relocation expenses.

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Employees are permitted to incorporate personal travel with business travel providing:

- That such business-personal travel is authorized,
- that such personal travel costs are borne by the employee,
- that such personal travel does not interfere with the performance of Company business during the trip,
- That the personal travel is on the employee's free days or during Paid Time Off.

Travelers should contact the following parties should an auto accident involving the rental car occur:

- The rental car agency
- Local authorities

ALTERNATE TRANSPORTATION MODES (SHUTTLE/TAXI/BUS/SUBWAY)

For ground transportation, the most cost-effective method should be used. Ground transportation should be shared if employees are traveling together. Travelers should consider the following alternate forms of ground transportation whenever they are more economical than renting a car or using a personal automobile.

- Public buses
- Subways
- Taxis
- Hotel and airport shuttle services
- Non-limousine car services/ride sharing services

PERSONAL CAR USAGE

All personal car use for travel for business purposes is reimbursable except for commuting travel between your home and your regular working location. The distance from your home and your regular working location must be deducted from all your personal car usage travel.

- Employees will be reimbursed for reasonable parking and toll expenses associated with business mileage.
- Fuel charges for personal car usage are not eligible for reimbursement.
- Traffic violation fines and parking tickets are not eligible for reimbursement.

Employees using their personal cars for business travel are responsible for carrying the required state minimum insurance coverage. Employees using their personal cars for business travel must have a valid state driver's license.

LODGING

Hotel Selection Guidelines: Travelers are expected to use negotiated or preferred rates whenever possible, as provided by designated local agencies. Each traveler is entitled to a standard single room accommodation. TOM CHESS T GROUP OF COMPANIES LTD will not reimburse travelers for additional lodging costs incurred for upgrades (suites, etc.). Travelers may accept complimentary upgrades.

Room Guarantee/Cancellations: Designated local agencies will automatically secure a room guarantee for late arrival on behalf of the traveler. It is the employee's responsibility to cancel reservations in accordance with the hotel's cancellation policy which may vary with hotels. Room costs incurred due to failure to cancel will not be reimbursed. When calling the travel agency or directly to the hotel, always make a note of the cancellation number.

Hotel Telephone Expenses: Employees will not be reimbursed for business-related local and long-distance telephone charges incurred while traveling if they have a company subsidized cell phone. In the event they do not have a company subsidized cell phone, only reasonable business-related calls will be reimbursed.

MEALS AND ENTERTAINMENT

Personal Meals: Personal meals are defined as meal expenses incurred by the traveler when dining alone on an out-of-town business trip. Travelers will be reimbursed for reasonable and actual meal expenses during an out-of-town business trip (up to three (3) meals per day) plus tax and gratuity (no more than 20%). Travelers should demonstrate good judgment when evaluating dining options and avoid extravagance.

Business Meals: Reimbursable business meals are defined as meal expenses incurred by employees when meeting with external contacts (clients, prospects, vendors, etc.) during which a legitimate business discussion takes place. Employees will be reimbursed for reasonable and actual meal costs, provided documentation requirements are met. The costs of business meals will be applied to

regional offices budget.

The following documentation is required for all business meals and must be provided on the expense report or request for direct payment:

- Date of meal
- Name, title, company name, and business relationship of all attendees
- Name and location of where meal took place
- Specific business purpose for discussion
- Exact amount of expenses
- Original receipt

CLIENT ENTERTAINMENT

Employees will be reimbursed for appropriate and reasonable business expenses associated with the entertainment of external business clients or associates. The client or business associate must have a potential or actual business relationship with TOM CHESS T GROUP OF COMPANIES LTD and the entertainment event must directly precede, include, or follow a business discussion beneficial to TOM CHESS T GROUP OF COMPANIES LTD.

Employees will be reimbursed for appropriate, reasonable, actual entertainment costs, provided documentation requirements are met. The following documentation is required for all client entertainment and must be provided on the expense report:

- Date of entertainment event
- Name, title, company name, and business relationship of all attendees
- Name and location of where event took place
- Specific business purpose for discussion, timing of discussion (before, during, or after event)
- Exact amount of expense
- Original receipt

6.4 EXPENSE REPORTS POLICY

All employees requesting reimbursement for business and travel expenses must complete a TOM CHESS T GROUP OF COMPANIES LTD Expense Report. Accounts Payable reserves the right to refuse or delay payment of expense reports that are not deemed reasonable, incomplete, or do not comply with the approval and/or documentation requirements established in this policy. Any expenses not deemed reasonable will be escalated to the CEO for review and resolution.

TIMING REQUIREMENTS

Employees are expected to complete expense reports within 30 days of the completion of business travel. TOM CHESS T GROUP OF COMPANIES LTD will not reimburse items over 60 days. Repeated failure to submit expense reports within the required timeframe may result in non-reimbursement.

APPROVAL PROCESS

When expenses are now submitted, it will immediately flow to Accounts department for review. With this change, Accounts will review the expense report first, after review; it will then flow to supervisor/manager.

IF the supervisor or manger is NOT the project manager for that project, it is the supervisor/managers responsibility to forward to the Project Manager for approval. Accounts will audit each expense for all required documentation:

- Supporting documentation and that receipts have been uploaded and attached to each appropriate line item
- Policy Compliance
- Correct calculations

Incomplete expense reports will be returned to employees for correction.

Once all approvals have been completed, it is now flowed back to accounts, to complete the process for payment.

RECEIPT REQUIREMENTS

Receipts are required for all items N10, 000.00 or over. If receipts are available for items N10, 000.00, it is best practice to include. When submitting expense reports, all original receipts, indicating the expense has been paid, are to be attached to line item. The following are acceptable receipt forms:

- Original receipt obtained from vendor
- Client's copy of the credit card receipt
- Cash register receipt
- Itemized hotel folio (required for all lodging expenses)
- Itemized phone bill (required for all telephone expenses) - must have the page that shows all telephone numbers and total charges

The following are not acceptable receipt forms:

- Restaurant tear tabs
- Photocopies of acceptable receipt forms (unless accompanied by a written explanation)
- Ticket stubs for concerts, theatre, and sporting events
- Gift certificate copy or voucher Items N10, 000.00 or over that are not supported by an acceptable receipt will not be reimbursed.

REIMBURSEMENT CYCLE

Check runs are processed every two weeks. Only expenses that have been submitted by the Saturday preceding the check run will be processed by accounting. If the expense report is submitted later, it will be processed in the following check run. This will allow the system time to

process all approvals needed.

EXPENSE REPORT FORM AND INSTRUCTIONS

Employees should submit their expense report. The Accounts Department reserves the right to delay or refuse payment of expenses submitted in invalid expense report formats.

Please contact the Finance Department Help Desk for training, information or Questions concerning the completion of the TOM CHESS T GROUP OF COMPANIES LTD Expense Report form

6.5 TELEPHONE EXPENSES POLICY

Cellular devices and internet access have become an inherent part of all our professional lives. The need for a mobile phone is now a normal requirement for many of us. TOM CHESS T GROUP OF COMPANIES LTD will provide at its discretion either a monthly allowance or company issued phone for designated individuals.

CELLULAR DEVICES (MOBILE PHONES, ELECTRONIC HANDHELD DEVICES)

Eligible employees who are required to have a cell phone to perform their job can be reimbursed for their mobile phone service with their supervisor's approval. Eligible employees include full-time employees who are at or above the position of Vice President, those who are in a billable position who are required to have a cell phone to perform their job, and those employees whose position requires international travel.

TOM CHESS T GROUP OF COMPANIES LTD will reimburse for the actual cost of voice and data service not to exceed N10, 000.00 per month. The amount will be provided via an expense report.

Employees whose job responsibilities include regular or occasional driving are expected to observe all traffic regulations pertaining to cellular device usage. Absence of any specific regulations, employees is expected to refrain from using their phone while driving. Safety must come before all other concerns. Regardless of the circumstances, including slow or stopped traffic, employees are strongly encouraged to safely pull off to the side of the road and stop the vehicle before placing or accepting either a business or personal call.

Employees who are charged with traffic violations resulting from the use of their phone while driving will be solely responsible for all liabilities that result from such actions.

TOM CHESS T GROUP OF COMPANIES LTD will not reimburse for mobile phone service over 60 days unless authorized by the EXECUTIVE GROUP CHAIRMAN/CEO.

BUSINESS CALLS FROM HOME

Employees will be reimbursed for reasonable long-distance charges associated with business calls made from their residence. Employees must submit a copy of the itemized phone bill with their expense report and identify all business-related calls. Employees will be reimbursed for individual call charges and applicable taxes only, not access or line fees.

6.6 OTHER EXPENSES

PROFESSIONAL DUES, MEMBERSHIPS AND MEETINGS

At management's discretion, employees will be reimbursed for reasonable professional dues, memberships and meeting fees. The expense report must be supported by a valid receipt.

POSTAGE

Employees on travel status will be reimbursed for business-related postage expenses.

6.7 INELIGIBLE EXPENSES POLICY

The following items are not eligible for reimbursement:

- Airfare class upgrades driven by non-essential multi-segment flights
- Babysitting services
- Books, magazines, newspapers, etc. for personal use
- IT hardware or software purchases
- Work boots
- Business meals with employees only (unless properly authorized, see section Meals and Entertainment)
- Car insurance and deductibles for personal autos
- Car maintenance, washes, etc. for personal autos
- Dry cleaning or laundry services for stays less than five (5) nights in duration
- Extra baggage charges for personal items
- Expenses incurred by spouses or travel partners
- Finance charges or late fees on personal or corporate credit cards
- Personal grooming fees (haircuts, manicures, massages, shoe shines, etc.)
- House sitting services
- Insurance (travel, baggage, etc.)
- Lost/stolen cash or personal property
- Mini-bar charges
- Charitable or political contributions
- Personal entertainment such as in-room movies
- Spa, health club, tennis fees, etc.
- Personal toiletries and medicines
- Traffic violations and parking tickets
- Upgrade fees for airfare, car rental, or lodging
- All Mobile Device equipment and accessories, e.g., phone devices, cases, batteries, Bluetooth, batteries

- Any other expense not directly and reasonably related to the conduct of company business

6.8 VENDOR SPEND POLICY

To ensure that TOM CHESS T GROUP OF COMPANIES LTD adheres to industry best practices when going to market for products and services and that TOM CHESS T GROUP OF COMPANIES LTD is achieving the best value for its third-party vendor contracts, all third-party contracts for corporate/overhead spend must be reviewed and approved by Human Resources. All contracts for professional services (e.g., Law Firms, Consulting Firms, Accounting Firms, etc.) must be reviewed and approved by the Legal Department. All contracts for IT related vendor spend must be reviewed and approved by the IT Manager.

Contracts shall have a complete Contract Checklist prior to review. Any contemplated third-party vendors spend with an annual contract value greater than N5, 000,000.00 must follow a competitive process as outlined below.

Approval authority for executing contracts and signing invoices should follow the guidelines established in the Level of Authority Policy.

Competitive Process

For third-party products or services with an annual contract value greater than N5, 000,000.00, TOM CHESS T GROUP OF COMPANIES LTDs shall engage in a competitive process either through a Request for Quote ("RFQ"), Request for Information ("RFI"), or Request for Proposal ("RFP").

For renewal of contracts greater than N5, 000,000.00, a competitive process shall be conducted at least every three years.

SELECTIONS AND SOLICITATION PROCESS

TOM CHESS T GROUP OF COMPANIES LTD shall take a holistic approach in evaluating vendor proposals. Cost shall be the most important factor, but quality, total cost of ownership, and assurance of supply must be considered to arrive at the most economic outcome. Mechanisms to leverage spend through supplier consolidation and rationalization shall be considered.

6.9 PARKING POLICY

No TOM CHESS T GROUP OF COMPANIES LTD employee will be granted regular paid parking or the cost of parking in lieu of a parking space regardless of level, without approval from the EXECUTIVE GROUP CHAIRMAN/CEO



7. TIME OFF

7.1 PAID TIME OFF AND PERSONAL TIME

During the calendar year that an employee takes an unpaid leave of absence, the employee does not accumulate Paid Time Off for this period of time.

7.2 PERSONAL LEAVE OF ABSENCE

An employee may request unpaid leave for personal reasons up to a maximum of 30 days per situation. The reason for the leave cannot be covered by any other type of leave described in this Handbook. The employee must take all earned and unused Paid Time Off before unpaid personal leave will be granted; the combination of paid leave and unpaid leave will not exceed the 30 day limit for personal leave.

The Company may at its discretion grant a personal leave of absence without pay to employees in certain circumstances at the discretion of the EXECUTIVE GROUP CHAIRMAN/CEO. It is important to request any leave in writing to the Human Resources Department as far in advance as possible, to keep in touch with your supervisor or the Human Resources Department during your leave, and to give prompt notice if there is any change in your return date. If your leave expires and you have not contacted the Company, it will be assumed that you do not plan to return and that you have terminated your employment.

Upon return from a leave of absence, you will be credited with the full employment status which existed prior to the start of the leave.

The Company does not continue to pay premiums for health insurance coverage for employees on personal leaves of absence. Your coverage will continue until the end of the month in which your leave of absence begins.

Requests for personal leave should be limited to unusual circumstances requiring an absence of longer than two (2) weeks. Approved personal absences of shorter duration are not normally treated as leaves of absences, but rather as excused absences without pay.

7.3 RETURNING/NOT RETURNING FROM A PERSONAL LEAVE OF ABSENCE

Due to the nature of our business, TOM CHESS T GROUP OF COMPANIES LTD cannot guarantee either that an employee's job will remain available or that a comparable position will exist when return from an unpaid personal leave is sought.

When an employee is ready to return from a leave of absence without pay, TOM CHESS T GROUP OF COMPANIES LTD will attempt to reinstate the employee to his/her former position or to one with similar responsibilities.

If the position or a similar position is not available, the employee may be terminated.

An employee who returns to work following an unpaid leave will be considered as having continuous service. If an employee does not return from an unpaid leave of absence without pay, the termination date is the last day of the authorized leave period or the date the employee notifies

his/her supervisor/ manager he/she is not returning, whichever is sooner. Such employees may be considered for reemployment.

7.4 FAMILY AND MEDICAL LEAVE POLICY

Types of Leave Available

Many of our employees are entitled to an unpaid leave of absence for up to 12 weeks in any 12 month period:

- for the birth of a child of the employee, and to care for the child;
- for the placement of a child with the employee for adoption or foster care, and to care for the child;
- to care for an immediate family member (spouse, domestic partner, child, domestic partner child, parent, or parent in-law – which also includes parents of domestic partners) with a serious health condition; or
- where the employee is the spouse, child, parent, or next of kin to a covered service members wounded in the line of duty while on active duty; or
- to take medical leave when the employee's own serious health condition renders the employee unable to perform the regular functions of the employee's position.

Serious Health Condition

Generally, a serious health condition is any illness, injury, impairment, or physical or mental condition that involves:

- any period of incapacity due to pregnancy or prenatal care;
- any period of incapacity connected with in-patient care (an overnight stay) in a hospital, hospice, or residential medical care facility;
- any period of incapacity due to a chronic serious health condition requiring periodic visits for treatment by a health care provider; or
- a period of incapacity of more than three calendar days that also involves treatment two or more times by a health care provider.

ELIGIBILITY

To be eligible, the employee must have:

- been employed by TOM CHESS T GROUP OF COMPANIES LTD for at least 12 months; and
- Worked at least 1,250 hours for TOM CHESS T GROUP OF COMPANIES LTD during the previous 12 months.

Intermittent and Reduced Schedule Leave

Leave granted due to the serious health condition of the employee or a family member may also be taken intermittently or on a reduced leave (part-time) schedule with certain restrictions.

Intermittent or reduced leave requested for the birth or adoption of a child is not permitted except with the agreement of TOM CHESS T GROUP OF COMPANIES LTD. Leave for the birth,

adoption, or foster placement of a child must commence within one year of the birth or adoption

Obtaining Leave

Eligible employees must provide 30 days' advance written notice for leave due to the birth or adoption of a child (unless not possible, in which case, as much notice as practical).

Eligible employees must provide 15 days advance written notice for leave due to the serious health condition of the employee or a family member where the need for such leave is foreseeable based on planned medical treatment (unless not possible, in which case, as much notice as practical).

Eligible employees must provide as much advance written notice as practical where the need for leave is not foreseeable. Where written notice is impractical, employees must provide oral notice as soon as practical and later confirm the notice in writing.

The notice described above must be provided to the Human Resources Department.

Employees must provide a certification issued by a licensed health care provider demonstrating the need for leave, and, where possible, do so prior to the start of the leave. TOM CHESS T GROUP OF COMPANIES LTD may require periodic re- certifications for longer leaves. TOM CHESS T GROUP OF COMPANIES LTD may also require, at TOM CHESS T GROUP OF COMPANIES LTD's expense, a second or third opinion concerning the need for leave.

Eligible employees must comply with all requests for paperwork, medical certifications, and notice requirements. The failure to do so may lead to a delay in leave approval and/or discipline, up to and including termination.

Benefits While on Leave

TOM CHESS T GROUP OF COMPANIES LTD will continue to provide workers taking family and medical leave with health insurance benefits as if those employees had continued to work during the leave period. Employees on leave will be responsible for their premiums and other insurance costs as if they had remained working. However, an employee who fails to return from leave generally will be required to reimburse TOM CHESS T GROUP OF COMPANIES LTD for the costs of benefits continued during the leave, unless the failure to return to work was caused by the continuation, recurrence, or the onset of a serious health condition or certain other circumstances beyond the employee's control.

Unused Paid Time off Time

Employees must use accrued but unused PTO time during any family or medical leave during the first seven (7) days.

Returning to Work

Employees taking family or medical leave will be returned to their former positions or a substantially equivalent position upon return from leave, to the extent required by law. Employees taking leave for their own serious health condition will be required to present a fitness-for- duty report prior to being returned to work. The failure to return from leave at the leave's expiration may result in termination of employment. An employee requesting an extension of leave must give at least five (5) business days' notice where possible. Reinstatement may not be available to some executives or "key employees."

Questions Regarding This Policy

For more details about eligibility requirements, the type of certifications needed, or any other aspect

of the family and medical leave laws, please contact the Human Resources Department.

Accrued Paid Time Off

An employee who goes out on an unpaid medical leave shall continue to accrue their PTO. If the employee does not return to TOM CHESS T GROUP OF COMPANIES LTD once the leave ends, the employee is not entitled to their PTO time which accrued during the unpaid leave time.

7.5 CHILDREN IN THE WORKPLACE

The Company appreciates that parents occasionally have a schedule conflict with their regular babysitter or daycare arrangements. However, it would not be possible to allow all employees to bring their child or children to work with them on these occasions. In addition, this practice has often been disruptive in the past. Therefore, we would ask that all employees refrain from bringing children to the office during regular business hours.

7.6 BEREAVEMENT LEAVE

Full-time active employees may take up to a maximum of three (3) consecutive scheduled work days off with pay for the loss of an "immediate family member" (includes the employee's spouse, domestic partner, parents [including step parents, foster parents, parents-in-law and domestic partner's parents], grandparents, siblings (including in-laws), children, children of a domestic partner, step child, adopted child, a child for whom the employee has parenting responsibilities) with the approval of the Company. A one-day leave will be paid in order for an employee to attend the funeral of a member of their non-immediate family, including aunts, uncles, cousins, etc. The day of leave will be granted on the day of the funeral only and will be paid only if the funeral is held on a regularly scheduled work day.

Employees should make their supervisor aware of their situation. In turn, the supervisor should notify the Human Resources Department of the reason and length of the employee's absence.

Upon returning to work, the employee must record the absence as Administrative time on their executives or "key employees."



8. LEAVING TOM CHESS T GROUP OF COMPANIES LTD

8.1 RESIGNATION/NOTICE PERIOD

When an employee resigns, it is requested for the benefit of the Company only that the employee provide the Company with at least a written two-week advance notice period. The Company will only compensate employees for unused Paid Time Off when the employee works throughout the notice period, and is not terminated for misconduct; otherwise, unused accrued Paid Time Off will be forfeited unless prohibited by law. In addition, if an employee wishes to take PTO once an employee resigns, they may only use accrued PTO time. If, as sometimes happens, the employee's supervisor wishes for the employee to leave prior to the end of the employee's notice period, the employee shall not be paid for the remainder of that notice unless required by law.

Employees are required to keep the payroll staff informed of any changes in your address

8.2 DISMISSAL/SEVERANCE PAY

Full time employees whose employment or full time status is involuntarily terminated for reasons other than for cause (which may include poor performance, violation of company policies, or other actions, and which will be determined in TOM CHESS T GROUP OF COMPANIES LTD's sole discretion), will be eligible for severance in accordance with this policy, as long as company property and assets are returned upon termination (as more fully described below) and provided the employee executes a general release of claims in a form acceptable to the company.

If you are terminated for cause or are not a full-time employee (i.e., part-time employee, independent consultant, external consultant or intern), you are not entitled to severance. In addition, if you do not return from a leave of absence or terminated for falsification of credentials that you provided at the time of hiring, you are not entitled to severance. Executives with an executive severance package are not eligible for this benefit. A full time employee who is moved involuntarily from full time to part time status for reasons other than for cause will be eligible for severance in accordance with the provisions of this policy.

Severance will be commensurate with years of full-time service at TOM CHESS T GROUP OF COMPANIES LTD or as adjusted for years of service at acquired or merged companies. Regardless of level, severance will be prorated to the nearest month and paid out as follows based upon your start date:

- Less than two years of service: Two weeks total.
- Two years or more of service: One week for every year of service, calculated on a prorated basis.

Note: There is no maximum on the number of years included in the severance payout. Severance is calculated on current base pay only. If enterprise date and start date vary, Management reserves the right to determine years of service based upon individual circumstances. Any employee who is paid severance and is later rehired as a full time employee, may again become eligible for severance under the terms of this policy; in such event the employee's years of service shall be calculated from the date of rehire as a full time employee.

In areas where there is statutory gratuity and/or severance, statutory gratuity and/or severance will be paid out and, if the TOM CHESS T GROUP OF COMPANIES LTD severance calculation equates to a higher payout, the employee will be paid the additional amount (i.e., the difference between TOM CHESS T GROUP OF COMPANIES LTD's higher policy and the lower statutory payout).

Local labor laws dictate statutory gratuity. TOM CHESS T GROUP OF COMPANIES LTD has the right to adjust the additional paid amount (i.e., the difference between TOM CHESS T GROUP OF COMPANIES

LTD's higher policy and the lower statutory payout) as calculated on base pay only.

8.3 CALCULATION OF PAID TIME OFF (PTO) PAY UPON TERMINATION OF EMPLOYMENT POLICY

In the event employment is terminated, a calculation will be made of PTO earned by the terminated employee and PTO hours accrued during the current benefit year. The number of hours actually used by the employee will then be deducted from these accrued amounts. Upon termination, the employee will be paid all accrued but unused PTO at the employee's base rate of pay.

If the employee has utilized more PTO time than has accumulated, an adjustment will be made in his or her final paycheck. If there are insufficient funds available to make this adjustment, the terminated employee will be required to reimburse TOM CHESS T GROUP OF COMPANIES LTD for any difference.



