



J.B. Boda Insurance Surveyors & Loss Assessors Pvt. Ltd.

Compliance Code

SECTION A	:	JBBISLA Compliance Principles
SECTION B	:	JBBISLA Compliance Programme
SECTION C	:	Declarations

The objective of the JBBISLA Compliance Code ("Code") is to show how JBBISLA approaches Compliance within its organization as per the JBBISLA Compliance Code which aims to enhance the status of the Profession by ensuring that JBBISLA employees abide by high standards of professional conduct throughout its organization to assure its ethical behavior and the integrity of its services.

Introduction

J.B.Boda Insurance Surveyors and Loss Assessors Pvt Ltd., is fully committed to the principle of honesty, integrity and fair play in all its businesses and activities. All officials and staff should ensure that the businesses of the Organization, such as procurement of materials, hiring of staff and services for activities, are dealt in an open, fair and impartial manner.

This Code of Conduct sets out the basic standard of conduct expected of all officials and staff and the Organization's policy on such matters as acceptance of advantages and declaration of conflict of interest. This Code also applies to temporary or part-time staff employed by the Organization

1. INTEGRITY

All services must be undertaken professionally and honestly in accordance with agreed standards, methods and policies. JBBISLA acts independently without succumbing to pressure and inducements to misrepresent findings or alter the results of its inspections, certifications, audits or testing. All findings must be adequately documented and no untruthful or misleading reports or certificates issued. All findings and results must be accurately documented and must not be changed improperly

1.1 JBBISLA will provide guidance to its employees for dealing with clients who expect them to abuse tolerances to obtain acceptable results.

1.2 In respect of those business sectors in which JBBISLA is active, JBBISLA will comply with any sector specific Integrity Rules published by the applicable TIC Committee.

2. CONFLICTS OF INTEREST

A conflict of interest situation arises when the "private interests" of the official and staff compete or conflict with the interests of the Organization. "Private interests" means both the financial and personal interests of the official and staff or those of their connections including:

- Family and other relations;
- Personal friends;
- Other companies or business interests which they hold or own (both in part and in whole);
- Other clubs and societies to which they belong; and
- Any person to whom they owe a favor or are obligated in any way.

Officials and staff should avoid using their official position or any information made available to them in the course of their duties for the Organization to benefit themselves, their relations or any other persons with whom they have personal or social ties, or business connections. They should avoid putting themselves in a position that may lead to an actual or perceived conflict of interest with the Organization. Failure to avoid or declare any conflict of interest may give rise to criticism of favoritism, abuse of authority or even allegations of corruption, which are to the corporate disgrace of the Organization.

Officials and staff involved should declare conflict of interest if they are closely related to, or have or will likely be perceived to have, beneficial interest in any company which is considering submission of quotation/tender to the Organization or is being considered for selection as the Organization's supplier of goods or services.

2.1 In order to avoid conflicts of interest, or the appearance of conflicts of interest, in its business transactions and services, JBBISLA will maintain a policy stated as above regarding conflicts of interest.

2.1 The policy will provide guidelines to employees in order to avoid conflicts of interests between

- A. JBBISLA and related entities in which JBBISLA has a financial or commercial interest and to which it is required to provide services, and
- B. JBBISLA's companies and/or divisions engaged in different activities but which may be providing services to either the same client or each other.

2.2 The policy will provide, as a minimum, that its employees do not

- A. Directly or through relatives, friends or intermediaries, acquire an interest in a supplier, a client or a competitor, except for the acquisition of shares of a client, supplier or competitor on a public stock exchange, and then only to an extent which does not grant significant influence over the affairs of the client, supplier or competitor and which does not make the employee unduly dependent on its financial fortunes;
- B. Hold any position with a competitor or client;
- C. Conduct any company business with any member of their family or with an individual or organization with which they or their family is associated;
- D. Employ a member of their family without approval of the JBBISLA management.

2.3 The policy will ensure the periodic rotation of staff at the inspection/surveying locations, so as to avoid excessive familiarity between employee and client. This is done on a continuous basis.

3 CONFIDENTIALITY AND DATA PROTECTION:

As part of our activities, we need to obtain certain information. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, social security numbers, financial data Etc. Our Company collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply.

Our data will be:

- Accurate and kept up-to-date
- Collected fairly and for lawful purposes only
- Processed by the company within its legal and moral boundaries
- Protected against any unauthorized or illegal access by internal or external parties

Our data will not be:

- Stored for more than a specified amount of time
- Transferred to organizations, states or countries that do not have adequate data protection policies
- Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

In addition to ways of handling the data the company has direct obligations towards people to whom the data belongs. Specifically we must:

Let people know which of their data is collected

- Inform people about how we'll process their data
- Inform people about who has access to their information
- Have provisions in cases of lost, corrupted or compromised data
- Allow people to request that we modify, erase, reduce or correct data contained in our databases

3.1 JBBISLA employees shall not discuss any confidential business information, obtained during the course of his/her employment, to other parties.

3.2 JBBISLA will ensure that all intermediaries' joint venture partners, agents, subcontractors, franchisees, contractors and suppliers are made aware of the confidential nature of business information that they may handle through their dealings with JBBISLA, and that they should not disclose confidential information to other parties.

3.3 Unauthorized meetings with suppliers/traders/receivers/consumers/operational personnel at any location are to be reported by the employee to their site in charge or manager.

3.4 Employees are not permitted to share information about the company and/or its activities except in the capacity of marketing or promotion of services. This too would be done with the prior permission and acknowledgment of the employee's site in charge or Manager.

4 ANTI-BRIBERY

4.1 Compliance with laws

JBBISLA will ensure that the Principles and Rules of its Program meet the requirements of the TIC Compliance Code and local laws relevant to countering bribery in all the jurisdictions in which it operates.

In the event that the local laws specify additional or different requirements, which are not covered by their Program, the Member should modify its Program for the country(ies) concerned. Records should be kept of countries where their Program has been modified.

4.2 Analysis of risks

JBBISLA's Compliance Committee and/or the senior executive, or his delegate, in each country of operation will organize periodic reviews to assess; relationship that could threaten the impartiality which can be on common ownership, management, personnel, shared resources, finances, contractual commitment, marketing (including branding) & payment on a sales commission or other inducement for the referral of new clients, relationship with clients, bribery risks and determine appropriate control measures. Such reviews will be systematically conducted:-

1. Prior to the commencement of a new service or the startup of operations in a new country and
2. Whenever a significant breach of the Compliance Program which warrants a review of the existing control measures occurs.

4.3 Business Principles for Countering Bribery

JBBISLA will employ good business practices and risk management strategies in accordance with the Business Principles for Countering Bribery as published by Transparency International and Social Accountability International (see www.transparency.org).

These will address at least the following areas:

4.3.1 Political contributions

JBBISLA its employees or agents will not make direct or indirect contributions to political parties, organizations or individuals engaged in politics, as a way of obtaining advantage in business transactions.

JBBISLA will account for all its political contributions in a separate ledger and consolidate all such payments made by any of the operations that form part of its organization.

4.3.2 Charitable contributions and sponsorships

JBBISLA will ensure that charitable contributions and sponsorships are not being used as a subterfuge for bribery.

JBBISLA will account for all its charitable contributions or sponsorships in a separate ledger and consolidate all such payments made by any of the operations that form part of its organization.

4.3.3 Facilitation payments

Facilitation payments are defined as small payments made to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has legal or other entitlement.

4.3.4 Gifts, hospitality and expenses

JBBISLA will prohibit the offer or receipt of gifts, hospitality or expenses whenever such arrangements could affect the outcome of business transactions and are not reasonable and bonafide expenditures.

5 FAIR BUSINESS CONDUCT

5.1 JBBISLA will provide guidelines to employees, agents and intermediaries to ensure that they understand and adhere to the Principle governing fair marketing.

5.2 JBBISLA's will maintain a fair business conduct policy prohibiting:

- A. Making un true statements about competitors, their operations, services and service offerings
- B. Activities contrary to rules for fair competition, anti-trust or tendering
- C. Inciting, including or encouraging any person to breach its contractual obligations.
- D. Commercial espionage and / or data theft

5.3 JBBISLA presentations and publications will accurately and unambiguously reflect their network and affiliations, resources / capabilities, experience and services provided.

6 HEALTH & SAFETY

6.1 JBBISLA will provide Health & Safety training to their employees appropriate for the activities they are engaged in.

6.2 JBBISLA encourages employees to report Health & Safety related incidents, record these investigate these incidents and if required, take corrective measures.

6.3 JBBISLA will mandate that all employees follow the JBBISLA Health & Safety Policy (as provided at time of employment) while on company property and on work sites. Employees are also to follow the Health & Safety policy required by and on work/client sites if different or additional that JBBISLA's own.

7 **FAIR LABOUR**

JBBISLA's compliance policy states our commitment to the following:

1. Compliance with at least minimum wage legislation and other applicable wage and working time laws.
2. Strictly prohibit the use of child labour.
3. Prohibits forced and compulsory labour – prohibits all forms of forced labour, whether in the form of prison labour, indentured labour, bonded labour, slave labour or any kind of non-voluntary labour.
4. The total respect of equal opportunities in the workplace regardless of gender, religion, caste, political affiliation, sexual orientation.
5. A zero tolerance policy towards abuse, bullying or harassment in the workplace.

IMPLEMENTATION:

Each member of the management of JBBISLA confirmed its commitment to implementing this Code.

JBBISLA published and adopted JBBISLA own Principles and the key elements of implementation(JBBISLA Compliance Programme) which:

Addresses all the TIC Compliance Principles and Requirements for implementation followed up the TIC Guidelines as specified in paragraph 2 of the introduction to these guidelines has been applied throughout the whole of the organization

Any updates to the compliance programme will be sent to the Director General of TIC within one month of publication

1. JBBISLA appointed a Compliance committee and Compliance officer to oversee and manage the Programme

The Compliance Officer, has, irrespective of his other responsibilities, responsibility and authority for the co- ordination of the implementation of the Compliance Programme throughout the organization. The Compliance Officer may nominate delegates to perform some or all of his functions within specified parts of the organization. Additionally, senior managers throughout the organization have responsibility for implementation of the Programme in their areas of responsibility. Each employee will be provided with a copy of the compliance programme and declarations will be obtained from them confirming that they have received a copy of the compliance programme -The employees' declaration will be kept on record.

JBBISLA established a Compliance Committee to carry out periodic reviews of the progress of the Compliance Programme and provide policy guidance. The Compliance Committee includes the Chief Executive Officer, the Compliance Officer and representatives from HR department.

2. JBBISLA trains staff, ensures their continuing understanding of the Compliance Programme and consults them on its development prior to job offer, prospective employees will be informed of the Compliance Programme. JBBISLA ensures that:

1. Each employee is provided with a copy of the Compliance Programme and requested to sign a declaration that it has been received, read and understood.
2. Each Senior Manager, including at least one in respect of each Group Member within JBBISLA (if any) as listed or referenced in the TIC Members Directory, signed an annual declaration (see Section C) that the Programme has been implemented in his/her area of responsibility.

All employees, including managers, of JBBISLA are required to undergo a Compliance Training Course. For the preparation of course material, JBBISLA has referred to the TIC Compliance Training Guide. A record of course completion is kept in each employee's file.

JBBISLA employees have the opportunity to provide input on the development of the Programme.

JBBISLA ensures that each employee has an on-going understanding of the Compliance Programme during employee performance evaluations.

JBBISLA Programme makes it clear that employees will not suffer demotion, penalty or any other adverse consequences arising from strict implementation of the Programme even if it may result in a loss of business.

JBBISLA is committed to follow the TIC Complaints and Disciplinary Procedures.

3. JBBISLA provides a help line for staff and encourages the reporting of violations on a confidential basis and free from reprisal except in malicious cases.

JBBISLA employees through the help line may obtain guidance on any question or matter of concern relating to the implementation or interpretation of the Programme. At the employee's request, any such question will be dealt with confidentially and the anonymity of the employee is protected to the extent reasonably practicable.

4. JBBISLA publicly discloses its Compliance Principles and facilitates enquiries, Complaints and feedback can be made by external interested parties.

5. JBBISLA investigates and records all reported violations and applies corrective and disciplinary measures.

A Compliance Officer or his/her nominated delegate(s) shall initiate, where appropriate, an investigation into any violation of the Programme reported to him/her or coming to his/her knowledge

A procedure is maintained for the handling of investigations and sanctions which shall include requirements for:-

- a) The maintenance of records of all reported violations and subsequent actions taken.
- b) The alleged perpetrator of such violation to have the right to be heard.
- c) The management to decide on the appropriate corrective and disciplinary measures to be implemented if a violation has been established. These measures may include a warning, demotion, suspension or dismissal.
- d) The Compliance Officer to receive progress reports from the delegates or Compliance committee members and the reports will be delivered to the Compliance Committee.

JBBISLA employees are encouraged to report details of violations or suspected violations either direct to the Compliance Officer, or to the employee's superior, senior management or internal auditor. The reporting employee will be fully protected against any form of reprisal unless she/he acted maliciously or in bad faith. If requested, the employee's anonymity will be protected to the extent reasonably practicable.

Employees are required to report any solicitation for, or offer of, an improper payment or advantage coming to their knowledge. The Compliance Officer will initiate, where appropriate, an investigation into any violation of the Programme reported to him or coming to his knowledge.

6. JBBISLA protects the security of confidential business information

JBBISLA implemented adequate security measures in its organization's premises containing confidential business information to ensure that access is restricted to authorized personnel only and that documents/data are stored in designated secure areas and disposed of in a secure manner.

7. JBBISLA maintain accurate books and records which properly and fairly document all financial transactions Off-the-books accounts are strictly prohibited.

8. JBBISLA maintain accurate books and records which properly and fairly document all financial transactions

JBBISLA ensured that its Compliance Programme is applied to the extent appropriate to its business partners. Such parties include:

- Intermediaries (entities or individuals external to JBBISLA who are required to promote the services of JBBISLA as part of their responsibilities, including consultants and advisers)
- Joint venture partners
- Agents (entities or individuals external to JBBISLA who are required to provide operational services, within the profession as defined in TIC's Articles of Association, on JBBISLA's behalf)
- Subcontractors (entities or individuals performing outsourced activities within the profession under a contract with JBBISLA)
- Franchisees (entities or individuals external to JBBISLA who carry on business within the Profession using JBBISLA trading name and/or brand, the rights to which are purchased from JBBISLA under a franchise contract)

JBBISLA does this by at least:

- Conducting due diligence before entering into or renewing any contract with the party. Due diligence includes a risk analysis, an interview with the party and an investigation of the party's background which, for intermediaries, should be reviewed and approved by JBBISLA compliance Committee
- Making known its Compliance Principles to the party and seeking assurance that the party will comply with the Principles in so far as these apply to activities performed on behalf of JBBISLA
- Except in the case of subcontractors, obtaining the party's contractual commitment to comply with the Compliance Principles and to allow JBBISLA to verify this periodically
- Monitoring the party's continual compliance with the Principles (and in the event of discovering a breach taking remedial action)
- Not dealing with any parties known to be involved in bribery.
- Verification through a remuneration analysis, approved by JBBISLA Compliance Committee that the remuneration paid to each intermediary is appropriate and justifiable for legitimate services rendered, and does not facilitate improper payments by the intermediary.
- JBBISLA accounts for all intermediaries' remuneration in a separate general ledger account in its accounting records and consolidates all such payments made by any of its operations and prepares annually a consolidated management statement of all intermediaries' remuneration.
- For intermediaries and other parties as may be appropriate, JBBISLA should provide training and support.

9. JBBISLA monitor the effectiveness of its Programme through the use of annual management declarations and internal auditing. JBBISLA require its nominated internal auditors, as part of their internal audit plan, to verify that the Compliance Programme has been implemented within its organization. The report will be submitted to the Compliance Officer, who will then prepare an annual summary report.

10. JBBISLA for the effectiveness of the implementation of the Programme will have it examined at least annually by a competent independent external audit firm.

11. JBBISLA submits copies of the independent assurance report, as per Annexure C of the TIC Guidelines including any reportable conditions, annually to TIC within six months of the end of its financial year.

MANAGEMENT DECLARATION

Confidential

JBBISLA Compliance Programme Management Declaration for the year ending XX
March XXXX To _____ (Compliance Officer)

Name of Manager:.....EMP Code.....

Job Title:.....

Locations and/or activities covered by this Declaration:_____

I(Name of Manager) do hereby declare that in implementation of JBBISLA Compliance Programme for the year ending XX March XXXX in each of the locations and/or activities, as listed above, falling under my area of responsibility:

1. To the best of my knowledge I, and the members of staff reporting to me, have complied in all respects with the Compliance Programme.
2. I have verified that the Compliance Programme have been distributed to each Employee who had not previously received them;
3. I have fully and completely reported to the Compliance Officer any violation or suspected violation of the Compliance Programme, including any solicitation or offer of any improper payment or advantage, which has come to my knowledge;
4. I have fully and completely implemented all corrective and disciplinary actions required by the Compliance Committee in respect of any violation of the Compliance Programme.
5. I agree to follow and adhere to the processes and guidelines outlined as per the ISO 17020 requirements

Place.....

Date.....

Signature.....

EMPLOYEE DECLARATION

Confidential

JBBISLA Compliance Programme Management Declaration for the year ending XX
March XXXX To _____ (Compliance Officer)

Name _____ of _____ Employee:EMP
Code.....

Job Title:.....

Locations and/or activities covered by this Declaration: _____

I(Name of Employee) do hereby declare that in
implementation of JBBISLA Compliance Principles for the year ending XX March XXXX
that:

1. I have read, understood and agree to comply with the Principles and Rules
as stated in the JBBISLA Compliance Code.
2. I have received a copy of the compliance program
3. I have received a Compliance principles training based on the TIC
Compliance Training Guide
4. I agree to report any violation of the Principles and Rules, including any
solicitation or offer of any improper payment or advantage, which may come to my
knowledge.
5. I agree to fully and completely implement all corrective and disciplinary
actions required by the Compliance Committee in respect of any violation of the Principles
and Rules
6. I agree that it is prohibited to disclose any confidential business information
obtained during my employment to other parties.
7. I agree to follow and adhere to the processes and guidelines outlined as per the
ISO 17020 requirements

Place.....

Date.....

Signature.....