***CODE OF CONDUCT, ETHICS & BUSINESS POLICY***

This policy is created to reinforce TWS Energy Controls’ commitment to conducting its business with integrity, whilst business is carried out in an ethical manner. In doing so, a sound business practice is instilled in all our business activities professionally and with integrity.

As General Manager of TWS Energy Controls, I am committed to maintaining a culture that promotes the prevention, detection and resolution of conduct that does not conform to laws, regulations, policies, or Code of Conduct.

It is essential that employees of TWS Energy Controls maintain integrity and comply with policies and code of conduct regardless of their responsibilities where business practices affect internal/external customers and suppliers.

In terms of practicing business, the interest of customers takes priority, and conflict of interest and external activities that would affect the company shall be avoided.

TWS Energy Controls’ intellectual property, customers’ records, drawings, etc., shall be maintained, and it is of the utmost importance that such sensitive documents are protected.

TWS Energy Controls is committed to maintaining the highest degree of confidentiality in all dealings with potential, current, and past clients, both in terms of normal commercial confidentiality, and the protection of all personal information received. Business services shall always be conducted honestly and honourably.

TWS Energy Controls maintains its quality with clients, and associates. We encourage regular reviews through feedback and meetings. We ensure that all policies under TWS Energy Controls’ management are followed.

We always strive to be fair and objective in our advice and actions, and we are never influenced by our decisions, actions or recommendations by issues or gender, race, creed colour, age, or personal disability.

In terms of trading, TWS Energy Controls strictly ensures that no trading relationship is conducted with those that are embargoed, and specially designated narcotics trafficking countries such Cuba, Iran, Syria, Sudan, and with companies involved in such practices.

TWS Energy Controls’ employees are strictly prohibited from removing any property from company premises whether belonging to the company, another staff member or some other party without prior authorisation from the property owner.

Falsification of any records at any time is strictly prohibited. In particular, employees are strictly forbidden from falsifying, destroying, removing or altering company records, reports, data or other documentation including financial, trade, product, technology, and personal information.

Employees are strictly prohibited from possession of weapons, explosives, firearms, or any other means of destruction to person or property, within the premises of the company, or outside company premises whilst on company business.

An employee may neither offer nor procure, nor accept or retain any value or benefit from anyone, company or individual doing or seeking to do business with TWS Energy Controls. Business shall not be carried out by trading favours.

All employees are engaged on the basis that they are able to and do give their best endeavours to the company at all times without any conflict of external interest or employment. They must be diligent in ensuring that they are able to give the company their best endeavours at all times.

No employee may have a direct or indirect financial interest in a competitor or with anyone (person or company) doing or likely to do business with TWS Energy Controls.

The use or diverting of any company or personnel information, trading, product, program, technology, or patent for personal or other gain to anyone is strictly forbidden.

Violation or disregard for the standards of ethical business practice or violation of this Policy constitutes grounds for termination of employment. All employees should be aware that, depending on the nature of the violation, immediate dismissal may apply.

I expect the full cooperation of every member of TWS Energy Controls.

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 Tony Hogg – Group General Manager

 TWS Energy Controls

 Date: 8 September 2015