



APPLIED EARTH SCIENCES

# CODE OF BUSINESS ETHICS AND CONDUCT

Solid ground for  
every decision.

**Doing what is right — on any ground,  
under any pressure.**

SAFETY · INTEGRITY · DIVERSITY ·  
SUSTAINABILITY · EXCELLENCE

WE MAKE IT HAPPEN

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This document is available to all Tectonians, and to clients, suppliers and other business partners. The controlled version is published at [tectoni.com](https://tectoni.com).

## Message from the Executive Chairman & Founder

Dear Tectonians,

Tectoni was built on a simple conviction: that the ground beneath Africa's dams, ports, pipelines and power stations must be known before it can be trusted — and that the people who do that knowing must themselves be worthy of trust. Our instruments measure the earth. This Code measures us.

Our work spans the African continent — over water, on difficult ground, in remote districts and capital cities alike. Our clients and partners are small and large, private and government, local and international. That diversity is our strength, and it is also our test. Different places will present different customs, different pressures and different temptations. Our answer to all of them is the same: we hold one standard, the highest one, everywhere we work.

This Code is your compass. It cannot answer every question about proper business conduct, but it will always point you in the right direction. And when the terrain gets complicated, you will never lose your bearings if you return to our core values: **Safety, Integrity, Diversity, Sustainability and Excellence.**

The standards in this Code are not new; they summarise, clarify and strengthen who we have always been. What is new is the ambition behind them. We do not intend simply to comply. We intend to be the reference — the firm that clients choose because our word is as reliable as our data.

Read the Code. Understand it. Live it. If you are ever unsure about the proper course of action, speak openly — to your supervisor, to management, or through any of our reporting channels, without fear of retaliation. Our success depends on it. Our success depends on you.

Sincerely,

**John Bosco Lubega**

Executive Chairman & Founder, Tectoni Africa Ltd

*“Our instruments measure the earth. This Code measures us.”*

JOHN BOSCO LUBEGA —  
EXECUTIVE CHAIRMAN &  
FOUNDER

**Q. Why does a specialist engineering firm need a 50-page Code?**

**A.** Because our clients build dams, water networks and power lines on our word. A firm whose data must be beyond doubt must have conduct beyond doubt. The Code is how we make integrity as measurable, repeatable and auditable as any test we run in the field.

**Q. Where do I go first if something feels wrong?**

**A.** Normally to your supervisor. If that is uncomfortable or inadequate, escalate up the chain, or use the Compliance & Ethics Hotline — by phone, WhatsApp or email — including anonymously. Chapter 1 explains every channel.

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Every entry above is clickable in the electronic version. The controlled electronic version of this Code, published at tectoni.com, always prevails over any printed copy.

## Tectoni at a glance

Tectoni Africa Ltd is a specialist Applied Earth Sciences company. We make the ground beneath critical infrastructure known — so that dams hold, foundations stand, waterways function, and the people who build and depend on them are safe.

From our home in Mukono, Uganda, Tectonians work across Uganda, Tanzania, Rwanda, Burundi, Kenya, the Democratic Republic of the Congo and Ethiopia. We deliver geotechnical and geophysical investigation, hydrogeology and water science, environmental and natural-hazard services, geoinformatics, and specialised civil and marine works — often over water and on the most difficult ground, where few others can operate.

Our clients include ministries and public utilities, international consultants and contractors, energy companies and development agencies. They call on us for the projects where precision is not optional: hydropower dams, water treatment plants, ports, transmission lines and earth dams. On such projects, an unreliable measurement is not an inconvenience — it is a risk to structures and to lives. That is why everything at Tectoni, from our certified management systems to this Code, is built around one promise: **precision our clients can build on, delivered safely, exactly as agreed.**

People are at the heart of this business. Our clients rely on competent, well-trained and dedicated Tectonians, and the way we work — and the way we want to be part of society — is founded in our core values. This Code is the translation of those values into daily business conduct.

The Code is ours, and it is a living document. We update it based on experience using it, and we welcome your questions, comments and suggestions through any of the channels in this Code.



7

COUNTRIES  
OF  
OPERATION

6

MISSION  
AREAS

### Q. Who is a “Tectonian”?

**A.** Everyone who works for or represents Tectoni — employees, directors, officers, and the contractors and agents under our supervision. If you carry our name onto a site or into a meeting, this Code travels with you.

### MISSION

Delivering end-to-end solutions for our clients' most complex, mission-critical infrastructure projects — advancing everyday life at scale, while setting new heights for safety excellence, schedule predictability and operational precision.

### VISION

To be the leader in all areas of Applied Earth Sciences and beyond in Africa.

## Our core values

Our values guide us in fulfilling our purpose. Each has a distinct role, but they are linked and equally important. Together, their sum is our collective strength — and no commercial target, deadline or instruction ever outranks them.

### Safety

Everyone goes home safe, every day — our people, our contractors and the communities around our work. Safety is not a department or a slogan; it is the first design criterion of every plan we make. Anyone, regardless of rank, has the authority and the duty to stop unsafe work, and will always be supported for doing so.

### Integrity

We are honest and forthright in all our dealings, internal and external. We uphold the public trust in everything we do, we keep our promises, and we bring back the truth from the field even when the truth is inconvenient. Bad news does not improve with age — and neither does a compromise of principle.

### Diversity

We embrace diversity of background, experience and perspective. We treat every colleague, client and community member with dignity and respect, and we build teams where people of different origins, beliefs and abilities can do the best work of their lives. A workforce that reflects the Continent we serve is a stronger workforce.

### Sustainability

We are stewards of the very earth we study. We minimise harm to the environment, manage resources responsibly, respect the cultures and heritage of our host communities, and leave every site — and every relationship — in a state we would be proud to sign our name to.

### Excellence

We perform the best we can today and embrace change so we perform better tomorrow. We measure ourselves by standards met and promises kept — not by effort spent. Excellence at Tectoni is a daily discipline of questioning, simplifying and improving, never a status we assume we hold.

In our daily dealings these values are lived through six behaviours: honesty and integrity; respect; continuous improvement; inclusion; openness and collaboration; and personal accountability.

## Purpose and scope of our Code

### What is the Code all about?

The Code is the extension of Tectoni's values into daily working life. It gives every one of us the guidance and support we need to conduct business ethically, comply with the law and protect our reputation — the three things on which our success ultimately rests. It is the centrepiece of Tectoni's guidance on ethical conduct, and it is derived from, and supported by, our more detailed policies and procedures.

### Why do we need a Code?

Tectoni's success depends on our reputation, our performance, and how we treat others — employees, clients, suppliers, competitors, governments and communities. Business practices and customs vary across the countries where we work; our standards do not. The Code sets the expectations for doing business safely, responsibly, ethically and legally; it reminds us of the values and principles to weigh when facing a dilemma; and it guarantees guidance and reporting channels free from any fear of retaliation. Where local laws or customs are less stringent than our values, our Code or our policies, **we always apply the higher standard.**

### Who must follow the Code?

The Code applies to our entire business: all employees, directors and officers of entities directly or indirectly controlled or operated by Tectoni, and all contractors, subcontractors, agents and suppliers acting under Tectoni's direction or supervision. We also expect our business partners — suppliers, clients, joint ventures and service providers — to embrace the principles of the Code. In joint ventures we do not control, we use our influence to encourage conduct consistent with it.

### What happens if the Code is breached?

We take breaches seriously regardless of the position of the person involved. Depending on severity, consequences range from a warning to termination of employment or contract, and may extend to persons who knew of a breach and failed to report it. Breaking the law can additionally expose you, and Tectoni, to prosecution, fines and imprisonment. Simply put: failure to follow the Code is misconduct.

**Q. Does the Code apply to me if I am a subcontractor on a Tectoni site?**

**A.** Yes. Anyone working under Tectoni's direct supervision must follow the Code. Our project and site leaders are responsible for making sure you know it.

**Q. The Code seems stricter than the law in the country where I work. Which do I follow?**

**A.** Both — which in practice means the stricter one. We never do less than the law requires, and where our Code demands more than the law, the Code prevails.

**Q. My manager told me to “just get it done” in a way that conflicts with the Code. Is that an excuse?**

**A.** No. No one at Tectoni — at any level — has the authority to instruct you to breach the Code. Refuse, and report the instruction through any channel in Chapter 1. You will be protected.

#### REMEMBER

If you know it's wrong, don't do it. If in doubt, ask. Never ignore what you believe may be illegal or unethical conduct. Set an example for others — and take responsibility for doing the right thing.

## Doing what is right — the Tectoni decision test

No document can tell you what is right in every situation — and this Code does not try to. What it gives you instead is a reliable instrument. When you face a decision the Code does not explicitly cover, run it through the same discipline we apply to any field measurement: test it from several directions and see whether the readings agree.

**Is it legal?**

Have I checked with Tectoni's Legal Department where there is any doubt?

**Is it consistent with our policies?**

Should I consult the Compliance Officer before acting?

**Does it honour our values?**

Would it conflict with Safety, Integrity, Diversity, Sustainability or Excellence?

**Am I involving the right people?**

Have those who should know been informed and consulted?

**Is it fair?**

If I act, would my decision be fair to everyone affected by it?

**Is it free of pressure?**

Am I making this decision myself, without improper pressure from others?

**The family test.**

How would I feel telling my family or children about this decision?

**The headline test.**

How would I feel reading about my choice in a newspaper — or explaining it to a judge?

If every reading agrees, proceed with confidence. If any single reading is off, stop — exactly as you would stop work on site when an instrument disagrees with the plan. Ask before you act. In addition to your manager or supervisor, you can consult Human Resources, HSSE, Legal, Finance, the Compliance Officer, or any senior leader you trust.

*“When the ground contradicts the model, believe the ground. When a decision contradicts your conscience, believe your conscience — and speak up.”*

**THE TECTONI DECISION DISCIPLINE**

This Code is a guide. It is to be interpreted as broadly as possible and read with a mindset of maintaining compliance — with its letter and, above all, with its spirit.



# 01

## WE SPEAK OPENLY

Every Tectonian is a sensor. What you see, hear or suspect is information the company needs — about safety, about quality, and about conduct. We believe everyone must have adequate, trusted channels for reporting suspected irregularities of any nature, anywhere we operate, secure in the knowledge that there will be no intimidation and no retaliation. Speaking openly is not disloyalty. Silence is.



ON SITE, EVERY VOICE COUNTS

### IN THIS CHAPTER

Speaking up and raising concerns · How to report · Zero tolerance for retaliation · Investigations and your duty to cooperate

## Speaking up and raising concerns

Never keep concerns to yourself. If you are ever worried that the Code is not being followed — or simply feel unsure about a situation — it is vital that you ask a question or share your concern as soon as possible. Reporting early allows us to act early: preventing further misconduct, protecting people, and limiting financial, reputational and legal harm.

You should normally begin as you would with any problem: consider what you can do to remedy the situation, and where possible discuss the question directly with the person involved. Then raise it with your immediate supervisor. If your supervisor's response is inadequate, or if it is uncomfortable or inappropriate to speak to your supervisor, escalate — as far up the chain as necessary, including to executive management — or use any other channel on this page. You are **required** to report suspected breaches of the Code, our policies or the law, whether they relate to yourself or to others.

### OUR COMMITMENT

- We provide multiple, accessible channels for raising concerns — including channels that allow anonymous reporting.
- We welcome every report made in good faith, treat it seriously and handle it promptly and as confidentially as possible.
- We protect everyone who speaks openly in good faith from retaliation of any kind — without exception.
- We give feedback to reporters where we properly can, so that speaking up is never a message into the void.

### YOUR COMMITMENT

- To raise concerns promptly — about breaches of law, the Code, our policies, or unethical behaviour by anyone we work with.
- To report questionable accounting irregularities or breaches of key internal controls.
- To make reports honestly: a good-faith report that turns out to be unsubstantiated is welcome; a knowingly false report is itself misconduct.
- To respect the confidentiality of any matter you report or become involved in.

### How to raise a concern

#### Q. Choose whichever channel you trust:

- A.** 1. Your supervisor — or their supervisor, up to executive management  
 2. Compliance & Ethics Hotline (telephone): **+256 39 3102940**  
 3. WhatsApp: **+256 726 148 145**  
 4. Email: **info@tectoni.com** (marked "Compliance — Confidential")  
 5. Human Resources, Legal, or the Compliance Officer directly

#### Q. My supervisor told me to do something I believe is dangerous and possibly illegal. I'm afraid of repercussions. What should I do?

**A.** Share your concern — this is potentially serious. Raising it with your supervisor is clearly inappropriate here, so go to HR, Legal, the Compliance Officer or the Hotline, anonymously if you prefer. If anyone retaliates against you, report that immediately: retaliation is never tolerated and will be acted on swiftly.

#### Q. I suspect a manager awarded a supply contract to a friend's company without considering price or capability. What should I do?

**A.** Report it — to your line manager if possible, otherwise through any other channel. Your concern will be handled confidentially, and you are protected when reporting in good faith.

### KEY POLICIES

Whistleblowing Policy · Compliance & Ethics Hotline Procedure

## Zero tolerance for retaliation · investigations

### Zero tolerance for retaliation

We have zero tolerance for retaliation against anyone who raises a concern about conduct they believe does not comply with our Code, our policies or the law — even if the concern is not ultimately substantiated. As long as you do not knowingly make a false report, you can speak openly without fear of dismissal, discrimination, harassment, intimidation, demotion, denied opportunities or any other adverse consequence. Retaliation in any form is itself a serious breach of this Code and will be disciplined accordingly — up to and including termination.

### How investigations work

Every report is assessed, and where warranted, investigated by people with the independence and competence the matter requires. Investigations are conducted fairly, objectively and as confidentially as possible — protecting the reporter, the facts, and also the rights of any person under investigation, who is presumed to have acted properly until facts establish otherwise.

#### YOUR COMMITMENT DURING AN INVESTIGATION

- To cooperate fully with investigations and audits, providing clear, complete and truthful information and documentation.
- To preserve relevant records — never destroy, alter or conceal documents connected to an investigation. In some cases cooperation may extend to work-related information stored on personal devices or personal accounts you have used for work purposes.
- To keep investigation details confidential, protecting everyone involved.
- Never to attempt to identify, contact or influence an anonymous reporter or a witness.

*“Bad news does not improve with age. The earlier you report, the more we can protect — people, projects and the company.”*

TECTONI COMPLIANCE  
PRINCIPLE

**Q. I reported a concern about my project manager three months ago. Since then I've been left off two field rotations I would normally lead. Coincidence?**

**A.** Maybe — but you should not have to wonder. Raise it through any reporting channel. We will look at whether the change is connected to your report, and if it is, that is retaliation and will be dealt with severely.

**Q. What if I was involved in the problem myself? Should I still report it?**

**A.** Yes. Voluntarily reporting your own involvement, early and honestly, will always be considered in your favour when consequences are weighed. Concealment, by contrast, compounds the original breach.

#### KEY POLICIES

Whistleblowing Policy · Investigations Protocol ·  
Disciplinary Procedure

# 02

## WE VALUE OUR PEOPLE

Tectonians are our greatest strength. We value diversity of people and thought, and we treat everyone we work with — and everyone our work touches — with fairness, respect and dignity. We intend for everyone, everywhere, to go home safe, every day. On a barge in the middle of a lake, at a borehole in a remote district, in the laboratory and in the office: the standard is the same.



TECTONIANS IN THE FIELD

### IN THIS CHAPTER

Fair employment and equal opportunity · Harassment and bullying · Health, safety, security and environment · Drugs and alcohol · Wellbeing · Background checks



## Fair employment and equal opportunity

We believe everyone should have equal opportunity. We recruit, select, develop and promote people on qualifications, experience, competence and performance — never on race, colour, religion, national origin, tribe, sex, age, disability, ancestry, social origin, trade-union membership, political belief or any other characteristic protected by law or irrelevant to the job.

Our success relies on our ability to attract, develop and retain the best talent at every level, and a diverse workforce strengthens both our culture and our business. We respect the right of our people to choose whether to belong to a union and to bargain collectively, and we have zero tolerance for any form of modern slavery, including forced, compulsory or child labour.

### OUR COMMITMENT

- Respect the rights of our employees and provide safe working conditions and fair terms of employment.
- Create a work environment where every Tectonian has an equal opportunity to develop their skills and advance.
- Encourage the involvement of employees in the planning and direction of their work, and provide channels to report concerns.
- Value all our people and respect their diversity, no matter who they are or where they come from.

### YOUR COMMITMENT

- To base hiring, evaluation, promotion, development, discipline, compensation and termination decisions on qualifications, merit, performance and business considerations only.
- To never discriminate against any individual or group on factors irrelevant to their ability to do the job.
- To support Tectoni's commitment to an inclusive, fair workplace — and make sure clients, suppliers and partners are aware of it.
- To communicate with respect and integrity, valuing people's diverse beliefs and perspectives.

**Q. I'm a female engineer who wants to work on over-water field operations, but I've heard it's a male-oriented environment. Will I get a fair opportunity?**

**A.** Yes. Tectoni is interested in knowledge, skills and ability. We hire, develop and promote qualified people for every role — field, laboratory, engineering and leadership — regardless of gender.

**Q. A field position involves weeks away from home, so I assumed it wouldn't suit a single parent and didn't shortlist one. Practicality, not prejudice — right?**

**A.** Wrong. You must consider all candidates whose qualifications meet the job requirements, not your assumptions about their lives. Deciding for people based on family status violates our principles, may break the law, and risks missing the best person for the job.

### KEY POLICIES

Human Rights Policy · Equality of Opportunities Policy · Communications Policy

## A workplace free of harassment and bullying

Every Tectonian deserves a safe and professional atmosphere where merit and competence are what count, and where diversity and trust are promoted. We do not tolerate harassment or bullying in any form — verbal, physical or visual — whether it happens on site, in the office, at a work event, or through email, chat or social media.

All forms of harassment share a common trait: behaviour that creates an intimidating, offensive or demeaning environment. Sexual harassment can include unwanted advances, inappropriate jokes, sexually suggestive comments, touching, requests for favours and inappropriate remarks about appearance. Harassment also includes offensive comments, jokes or pictures related to race, colour, religion, national origin, tribe, sex, age, disability, sexual orientation, gender identity or any other protected status. Materials sent privately using company email or messaging can still constitute harassment — and have no place at Tectoni.

### OUR COMMITMENT

- We maintain a workplace free from harassment, bullying and intimidation — and act promptly and decisively when it occurs.
- We look out for our own, and one another's, physical and mental wellbeing.
- We protect anyone who reports harassment in good faith, whether they are the target or a witness.

### YOUR COMMITMENT

- To never engage in any behaviour that could be viewed as offensive, intimidating, malicious or insulting — in person or online.
- To intervene where safe, and report harassment or bullying when you see it, even if you are not the target.
- To act on social media in a way consistent with our values, remembering that “private” comments about colleagues rarely stay private.

**Q. A crew member keeps making jokes about a colleague's tribe. The colleague laughs along. Is it still harassment?**

**A.** It can be. People often laugh to defuse discomfort, especially in small field crews where they depend on each other. Judge the behaviour, not the reaction: jokes targeting tribe, religion or origin are inconsistent with our Code. Speak to the joker, or report it.

**Q. My supervisor shouts at people and calls their work “useless” in front of the whole crew. Is that just a tough management style?**

**A.** No. Demanding high standards is leadership; public humiliation is bullying. Report it. Leaders at Tectoni are accountable for how they achieve results, not just whether they achieve them.

### KEY POLICIES

Human Rights Policy · Equality of Opportunities Policy · Grievance Procedure

## Health, safety, security and environment (HSSE)

Keeping our workplaces free of fatalities, occupational disease and injury is what we strive for every day — and it is everybody's responsibility. Our commitment is based on a conviction: incidents are preventable. Much of our work is intrinsically hazardous — drilling, marine operations, confined spaces, high-pressure equipment, live infrastructure — which is exactly why safety is engineered into our plans, not added afterwards.

Our HSSE responsibilities are integrated into how Tectoni conducts business, under our certified management systems (ISO 9001:2015 and ISO 45001:2018) and site-specific Risk Assessments and Method Statements (RAMS). Through them we protect the wellbeing of everyone our operations touch: employees, clients, subcontractors and communities.

### OUR COMMITMENT

- Strengthen our safety culture through visible leadership, stakeholder engagement and effective policy implementation.
- Provide appropriate HSSE information, training, equipment and reliable tools for all Tectonians.
- Assess health and safety risks in all areas and implement plans to protect everyone — and openly report our HSSE performance.
- Address the environmental and health impact of operations by reducing waste and discharges and using energy efficiently.
- Help our people reintegrate into the workplace after illness or injury, whenever possible.

### YOUR COMMITMENT

- To stop work — and stop others working — whenever you believe it is unsafe or hazards cannot be controlled. This is your right and your duty, at every level.
- To lead by example: plan work carefully, follow procedures and rules, and come to work mentally and physically fit.
- To encourage and reinforce safe behaviour, and intervene in unsafe practices.
- To promptly report incidents, near-misses and hazardous conditions — near-misses are free lessons.
- To know what to do in an emergency at your place of work.

*“Calling the stop is never punished. Failing to call it is the failure.”*

TECTONI STOP-WORK  
AUTHORITY

**Q. Will I be penalised for stopping work over a safety concern — even if it delays the client's programme?**

**A.** No. Every Tectonian and contractor is empowered to stop work they consider unsafe. Schedule pressure is never a reason to accept an uncontrolled hazard, and leaders will back your call.

**Q. We had a small fuel spill of a few litres near the borehole. It's minor — report it?**

**A.** Yes. Report any spill or release with the potential to harm the environment. Tell your line manager straight away so action can be taken, and the cause investigated to prevent recurrence.

**Q. Why talk about safety so much when incidents hardly ever happen?**

**A.** Incidents shouldn't happen at all — and the talking is a large part of why they don't. Every brief, near-miss report and toolbox talk buys down risk.

### KEY POLICIES

Health & Safety Policy · Environmental Policy ·  
RAMS Framework · ISO 45001 OHSMS

## Fitness for work — drugs and alcohol

Personnel under the influence of drugs or alcohol endanger themselves and everyone around them — on a drill rig, on the water, on the road, and in every decision they make on Tectoni's behalf. The use, possession, distribution or sale of illegal drugs, and the misuse of alcohol or prescription medication in connection with work, are strictly prohibited.

Working on our sites means arriving fit for duty: rested, sober and unimpaired. Where client rules, site rules or local law are stricter than ours, the stricter rule applies. Limited, responsible consumption of alcohol at approved company or client functions may be acceptable — never before driving, operating equipment or returning to duty.

### OUR COMMITMENT

- We maintain a drug- and alcohol-free working environment and communicate the rules clearly to everyone on our sites.
- We may conduct screening where the law allows and safety requires — particularly for safety-critical roles and after incidents.
- We treat substance-dependence as a health matter first: Tectonians who voluntarily seek help before a breach occurs will be supported, confidentially, in getting it.

### YOUR COMMITMENT

- To arrive fit for work — never under the influence of alcohol or drugs on duty, on site or on call.
- To inform your supervisor if prescribed medication could affect your ability to work safely.
- To intervene or report if a colleague appears unfit for duty. Doing so is protecting them, not betraying them.

**Q. A colleague on the morning shift smells of alcohol from the night before but says he is “fine.” We are short-handed. Let it go?**

**A.** No. Impairment doesn't negotiate with staffing levels. Tell the site lead — the colleague must not work until fit. One short-handed shift is recoverable; a winch accident is not.

**Q. The client is hosting a dinner with drinks during a live project. Can I attend?**

**A.** Yes, with judgement. Moderate consumption at an approved function is acceptable if you are not returning to duty or driving afterwards, and your conduct remains professional — you are representing Tectoni all evening.

### KEY POLICIES

Health & Safety Policy · Fitness for Work Standard  
· Site Rules



## Wellbeing · background checks

### Wellbeing

Safety at Tectoni includes mental health. Long rotations, remote postings, deadline pressure and demanding clients are realities of our work — and they are exactly why we look out for one another's physical *and* mental wellbeing. Leaders are expected to plan workloads realistically, watch for signs of fatigue and overload in their teams, and treat a Tectonian who raises a wellbeing concern with the same seriousness as one who reports a mechanical hazard. We set demanding standards, and we refuse to meet them by burning people out: sustained performance comes from disciplined planning, not heroics.

### Background checks

Just as we require the employees and subcontractors we hire to be competent and professional, we must also know they are reputable and honest. Tectoni conducts pre-employment background checks on new hires as appropriate, on an as-needed basis and in accordance with local law. Anyone involved in procurement decisions or the hiring of contractors must likewise conduct appropriate background checks of those contractors, consistent with Tectoni's policies — including, where relevant, checks on ownership, reputation, sanctions and conflicts of interest.

#### YOUR COMMITMENT

- To plan your own work — and, if you lead, your team's work — so that fatigue never becomes the uncontrolled hazard on site.
- To speak up early when workload, rotation length or personal circumstances are affecting your fitness for work.
- To complete required background-check processes honestly, and never to engage a contractor or agent who has not been through the required vetting.

**Q. My crew has worked 21 days straight to hold a deadline and people are making small mistakes. The client wants us to push on. Do we?**

**A.** No — small mistakes are the instrument reading that precedes the big one. Escalate to your project manager: the schedule gets re-planned, or the crew gets relieved. Fatigue is managed like any other hazard, formally and honestly.

**Q. A drilling subcontractor can mobilise tomorrow, but their vetting isn't complete. The delay costs us money. Can we start them and finish the checks later?**

**A.** No. Vetting exists precisely for the moments it is inconvenient. An unvetted contractor on a Tectoni site is an unmeasured risk — safety, legal and reputational. Complete the checks first.

#### KEY POLICIES

Human Rights Policy · Recruitment & Vetting Standard · Supplier Standards

# 03

## WE ACT WITH PERSONAL INTEGRITY

No matter where we are located or what our role is, we act honestly, transparently and respectfully. Our actions and decisions reflect on us as individuals and as Tectonians — and we want to be proud of who we are and of the company we work for. Doing business with integrity strengthens the trust that our people, business partners and communities place in us. It is not a constraint on winning work; it is the reason we keep winning it.



ONE STANDARD, EVERY CREW

### IN THIS CHAPTER

Bribery and corruption · Facilitation payments · Gifts, entertainment and hospitality · Conflicts of interest · Fraud

## Bribery and corruption

We do not engage in corruption, and we never pay bribes — regardless of who we are dealing with, what is at stake, or what the local custom or practice is said to be. A bribe is anything of value offered, given, requested or received to improperly influence a decision. It can take the form of cash, gifts, entertainment, travel, signing bonuses, job offers or internships, rebates or “kickbacks”, loans, fees, services, donations or favours.

The prohibition is absolute in both directions: we do not bribe, and we do not accept bribes. It applies to everyone acting for Tectoni — employees, agents, intermediaries and subcontractors — because a bribe paid on our behalf is a bribe paid by us. We are especially careful in dealings with public officials, where even the appearance of impropriety can be as damaging as the act.

### OUR COMMITMENT

- We never request, accept, offer, provide or authorise bribes of any kind, including facilitation payments.
- We only work with business partners who share our commitment to ethical conduct, and we conduct due diligence before engaging agents or intermediaries.
- We do not contribute to any political campaign, party, candidate or their affiliated organisations.
- We set realistic business objectives — never exposing our people to corruption risk through unrealistic targets or deadlines.
- We recognise colleagues who act with integrity, and never penalise anyone for losing business by refusing to pay a bribe.

### YOUR COMMITMENT

- To refuse and report any request for a bribe or kickback, from anyone, immediately.
- To ensure any gift or hospitality you give or receive is lawful, occasional, reasonable and free of any intent to influence.
- To watch for red flags in third parties: unusual commissions, vague “success fees”, requests for cash or offshore payments, or agents who “know how to get things done”.
- To record every payment and expense accurately, so that nothing improper can hide in our books.

*“We would rather lose a contract than win it corruptly. Lost revenue can be rebuilt. Lost integrity cannot.”*

TECTONI ANTI-CORRUPTION  
PRINCIPLE

**Q. An agent says he can “guarantee” a tender award for a 5% success fee, no questions asked. He has excellent connections. Do we engage him?**

**A.** No. A guaranteed outcome plus an unexplained fee is the classic anatomy of a bribe paid through an intermediary — for which Tectoni and you can be criminally liable. Decline, document, and report the approach to the Compliance Officer.

**Q. A client’s engineer hints that approving our invoices would go faster if we “supported” his daughter’s school fees. It’s a small amount and he controls our cash flow.**

**A.** This is a solicited bribe, however sympathetically framed. Decline politely, report it immediately, and let management handle the relationship. Never fund personal benefits for anyone in a position to influence decisions about Tectoni.

### KEY POLICIES

Anti-Corruption & Bribery Policy · AAGG Policy · Political Engagement Policy · Supplier Standards

## Facilitation payments

A facilitation payment is any payment to a public official, however small, to speed up or secure the performance of a routine government action that the official is already obliged to perform. Tectoni prohibits facilitation payments everywhere we operate — they are simply small bribes, and small bribes normalise large ones.

**Routine government actions** where facilitation payments are typically solicited include: issuing permits, licences or other official documents; processing governmental papers such as visas and work orders; providing customs clearance; providing police protection; providing utility services; and handling cargo.

We recognise that refusing these payments can cause real friction — delayed equipment at a border, a slower permit, an uncomfortable roadside conversation. We accept that friction as the cost of who we are, and we manage it the professional way: by planning lead times realistically, using proper legal channels and official expediting services where they exist, and escalating obstruction to management and, where appropriate, to the client.

### YOUR COMMITMENT

- To never make a facilitation payment on Tectoni's behalf, and to refuse requests for them courteously but firmly.
- To report every solicitation — it helps us map risk and protect the next Tectonian at that same border post or office.
- To plan mobilisations with enough lead time that “urgency” never becomes the argument for paying.

### The only exception: safety

If you face an imminent threat to your health, safety or liberty and a payment is the only way to remove yourself from danger, protect yourself first. Then report the incident to the Compliance Officer as soon as safely possible, so it can be accurately recorded and addressed. A payment extorted under duress is not a facilitation payment — but it must never stay hidden.

**Q. Our drill rig is stuck at the border. The clearing officer says a “special handling fee” of a small cash amount will release it today; otherwise “maybe next week.” The delay costs far more than the fee. Pay it?**

**A.** No. This is a facilitation payment. Ask for the official fee schedule and a receipt; involve our clearing agent and escalate to management, who can raise obstruction formally. The week's delay is real — and it is still cheaper than surrendering our standard.

**Q. At a roadside stop at night, an armed officer demands money before letting the crew vehicle pass. What do we do?**

**A.** Crew safety comes first — comply if there is a genuine threat, then report immediately. We will record it accurately, support you fully, and pursue the matter through proper channels. Duress is not corruption; concealing it afterwards would be.

### KEY POLICIES

Anti-Corruption & Bribery Policy · AAGG Policy · Journey Management Standard

## Gifts, entertainment and hospitality

Modest business courtesies can build legitimate relationships. They cross the line when their purpose — or their appearance — is to influence a decision. Our rule is simple: all gifts and entertainment must be given or received in good faith, occasional, reasonable, appropriate to the occasion, and never intended to influence the recipient's decision-making or gain an improper advantage.

### With private (non-government) parties

Transactions with non-government persons — entertaining potential and existing private clients, suppliers and vendors — are subject to accepted standard business practice under our Ethical Business and Gifting (EBG) Policy. Common courtesies that are usually acceptable without prior approval include occasional meals with business associates, occasional attendance at sports or cultural events, reasonable and customary marketing gifts, and promotional items of nominal value such as shirts or coffee mugs. Any non-executive employee must obtain **prior written approval from the Compliance Officer for any expenditure exceeding USD 500 per person.**

### With public officials

Dealings with public officials follow the far stricter AAGG Policy (Chapter 5). In practice: assume that *no* gift, hospitality or favour to a public official is acceptable without prior Compliance approval. What is a courtesy in the private sector can be a crime in the public one.

#### YOUR COMMITMENT

- To never give or accept cash or cash equivalents (vouchers, prepaid cards, loans) in any amount.
- To decline gifts or hospitality offered during tenders, negotiations or disputes — timing alone creates the wrong appearance.
- To record gifts and hospitality given and received in accordance with our registers, and seek approval where required.
- To ask yourself the headline test: would this look like influence if published? If yes, decline.

**Q. A supplier we regularly use sent me a holiday hamper worth roughly USD 80. Accept it?**

**A.** Generally yes — it is customary, nominal and occasional. Log it in the gift register. If the same supplier is currently bidding for new Tectoni work, politely decline or share it with the whole team openly.

**Q. A contractor offered to fly me to Nairobi for a “technical workshop” that looks mostly like a safari weekend. It would be impolite to refuse — and useful for the relationship.**

**A.** Decline. Travel and multi-day hospitality go far beyond an occasional business courtesy, and the disguised purpose makes it worse. If there is genuine technical content, Tectoni pays for its own people's travel.

**Q. I want to host a dinner for a private client's project team — about USD 700 per person at their preferred venue. Allowed?**

**A.** Only with prior written approval of the Compliance Officer — the cost exceeds the USD 500 per-person threshold. Be prepared to explain the business purpose and the guest list.

#### KEY POLICIES

EBG Policy · AAGG Policy · Anti-Corruption & Bribery Policy



## Conflicts of interest

A conflict of interest occurs when your personal or financial interests could take priority over — or even just appear to compete with — Tectoni's best interests. The classic example: a Tectoni manager hiring a subcontractor owned by their family. Whether or not anything improper happens, the manager's ability to hire and manage that subcontractor objectively is compromised, or appears to be. Appearance matters: a perceived conflict can damage our reputation as much as a real one.

Most conflicts are not misconduct — **concealing them is**. Many conflicts can be resolved acceptably if they are disclosed beforehand. The essential act is disclosure: tell your supervisor or management about any actual, potential or perceived conflict, promptly and in writing, so it can be managed.

### SITUATIONS THAT CAN CREATE A CONFLICT

- Hiring or recommending a supplier, subcontractor, agent or consultant in which you or a close family member has employment or a substantial ownership stake.
- Performing services for, or serving as a director or consultant to, a Tectoni competitor, supplier, subcontractor or client while employed by Tectoni.
- Taking for yourself or a family member a business opportunity that rightfully belongs to Tectoni, or competing with Tectoni.
- Using company assets, contacts or resources to start or support a private business or organisation.
- Benefits — gifts, entertainment — that may influence the objective exercise of your duties.
- Outside activities and employment that may affect your performance or objectivity at Tectoni.
- Working with relatives or close personal relations in a direct or indirect reporting line.

### OUR COMMITMENT

- We avoid conflicts wherever possible, understanding that even the appearance of a conflict can be damaging.
- We declare conflicts promptly when they arise — and we manage declared conflicts fairly, so honest disclosure is never punished.
- These rules apply to relationships with any supplier, agent, contractor, consultant or client, and with anyone actively seeking to win business from Tectoni.

**Q. My brother owns a hardware supply shop that genuinely offers the best prices in the district. Can my project buy from him?**

**A.** Possibly — but not through you. Disclose the relationship in writing first. If the shop truly is the best option, someone independent of you can run the procurement and document the comparison. What you must never do is decide, approve or influence it yourself quietly.

**Q. I've been offered evening consulting work for an engineering firm that sometimes bids against Tectoni. It's small and unrelated to my projects. Fine?**

**A.** Not without disclosure and approval. Working for a competitor — even peripherally — creates a conflict in loyalty, information and time. Declare it and let management assess whether it can be managed.

### KEY POLICIES

Conflicts of Interest Standard · AAGG Policy (government-related conflicts) · Supplier Standards

## Fraud

We do not engage in fraudulent behaviour, and we do not knowingly assist or facilitate fraud by any third party. Fraud is the act of engaging in deceptive or intentionally misleading activity to obtain an unfair or illegal financial or personal gain — and in a firm whose product is trusted data, it is an existential threat.

Fraud in our business can look like a padded expense claim or a forged signature — but it can also look like a fabricated test result, a back-dated calibration record, a “reconstructed” borehole log, or an inflated quantity on a progress claim. Every one of these is fraud. Every one is treated with the same severity.

### OUR COMMITMENT

- We are honest, and we do not engage in intentionally deceitful behaviour — including false expense claims, forgery, or the destruction, manipulation or alteration of documents, records or claims.
- We maintain internal controls designed to prevent and detect fraud, and we investigate suspected fraud rigorously and fairly.
- We report fraud to authorities where the law requires, and pursue recovery where appropriate.

### YOUR COMMITMENT

- To record everything you are responsible for — time, expenses, tests, quantities, results — truthfully, completely and at the time of the work.
- To understand the role you play in detecting and preventing fraud, and to report suspected fraud through any Chapter 1 channel.
- To never “help” a colleague, a client or the company through deception. There is no such thing as a fraud in Tectoni's favour.

*“A fabricated data point is not a shortcut. It is a structural defect — in the report, and in the person who made it.”*

TECTONI DATA-INTEGRITY  
PRINCIPLE

**Q. We lost one day's field notes in the rain. My colleague says we can reconstruct the readings from memory — they were “normal anyway.” OK?**

**A.** No. Reconstructed data presented as measured data is fabrication. Report the loss to the project manager: the affected interval is re-tested or the gap is disclosed transparently in the report. Clients can build on an honest gap; they cannot build on an invented number.

**Q. Money is tight this month. Can I claim my hotel at the full rate I was quoted, even though I got a discount, and settle it later?**

**A.** No. Claiming more than you paid is a false expense claim — fraud, in plain terms — regardless of intent to “settle later.” Claim what you paid.

### KEY POLICIES

Fraud Policy · Financial Controls Framework · Whistleblowing Policy



# 04

## WE OPERATE WITH INTEGRITY

Integrity is not only personal; it is institutional. It lives in our books and records, in how we compete, in how money moves through the company, and in how we treat the personal data entrusted to us. The accuracy of our financial results depends on every Tectonian properly recording information — and the fairness of the market depends on how we win. We intend to win a lot, and to win clean.

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### IN THIS CHAPTER

Accurate records and financial controls · Competing fairly · Competitive intelligence · Anti-money laundering and trade controls · Data protection and privacy

## Accurate records and financial controls

Every business decision at Tectoni — and every decision our clients, lenders and auditors make about us — rests on our records being accurate, complete and honest. The accuracy of our financial results depends on each employee properly recording information such as time charges, change orders, project estimates, expenses and payroll.

No employee will ever be pressured to alter financial or other data to “meet the numbers,” “help the company,” or for any reason unrelated to actual performance. Any manager who pressures or asks another employee to inappropriately alter results — or who does so themselves — will be subject to discipline, up to and including termination.

### OUR COMMITMENT

- Managers ensure adequate resources and oversight are devoted to implementing and following financial controls — on all projects, at all locations, at all times.
- We maintain books and records that fairly and accurately reflect every transaction, supported by reasonable detail and honest documentation.
- We meet our tax obligations responsibly in every country where we operate, and we do not construct artificial arrangements to evade them.

### YOUR COMMITMENT

- To verify that any financial results you are responsible for are accurate and complete before you submit them.
- To report your time accurately and fairly — whether billed to the company or to clients.
- To never create false, misleading or artificial entries, and never maintain undisclosed or unrecorded funds or accounts.
- To retain records in line with our retention rules, and never destroy documents relevant to a dispute, audit or investigation.

**Q. Quarter-end is close and my manager asked me to book next month's expected variation order as revenue now — “it's basically agreed.” Do I?**

**A.** No. Recording revenue before it is earned misstates our results, however confident the forecast. Decline, and if pressed, report it. “Basically agreed” belongs in the pipeline, not the ledger.

**Q. I worked 60 hours this week across two projects but the budget for one is exhausted. Charge everything to the other project?**

**A.** No. Time is charged to the project where it was actually worked — always. Budget pressure is a management problem to be solved honestly, not an accounting problem to be hidden.

### KEY POLICIES

Financial Controls Framework · Fraud Policy · Document Retention Standard

## Competing fairly in the marketplace

Tectoni succeeds because we deliver superior services and results. We believe in the free-market system, where merit, quality, price and other objective factors determine who wins. Competition laws exist to protect that system — and we comply with them everywhere we operate, in letter and in spirit.

Tectoni employees must never agree with a competitor to set pricing or contract terms, divide territories, markets or clients, rig bids, or boycott particular customers or suppliers. These agreements are illegal almost everywhere, harm the consumer, and need not be written or formal to break the law — a nod over coffee at an industry event can be a cartel.

### YOUR COMMITMENT

- To never discuss pricing, margins, bidding intentions, territories or clients with a competitor — and to end any conversation that drifts there, visibly and immediately, and report it.
- To take particular care in industry associations, conferences and joint-venture settings, where legitimate contact and illegal coordination sit dangerously close together.
- To compete hard on what we control — quality, precision, safety, reliability — and never through disparaging statements about competitors that are false or misleading.

### Teaming and joint ventures

Legitimate joint ventures, consortium bids and subcontracting arrangements are a normal part of our industry. They must be structured transparently, with legal review where required, so that cooperation on a specific project never becomes coordination across the market.

**Q. At a conference, a competitor's manager suggested we “stop killing each other on price” in one region — nothing written, just talk. What do I do?**

**A.** Refuse clearly (“we set our prices independently”), leave the conversation, and report it to Legal the same day. Even listening passively can implicate Tectoni. Your visible refusal is the company's best protection.

**Q. A client asked us to bid on work we can't fully perform alone. Can we team with a competitor for this one tender?**

**A.** Yes, potentially — project-specific consortia are lawful when structured properly. Involve Legal before any information is exchanged, keep shared information limited to what the joint bid requires, and document the arrangement.

### KEY POLICIES

Competition Compliance Standard · Supplier Standards · Legal Review Protocol

## Competitive intelligence

Understanding our market is legitimate and necessary. But Tectoni is committed to conducting business responsibly, ethically and legally — which includes avoiding even the appearance of improper information gathering. It is important to know what you can use, what you cannot, and what you must be careful about.

### INFORMATION THAT IS GENERALLY ACCEPTABLE TO USE

- Newspapers, press accounts and information publicly available on the internet.
- Other public information, such as annual reports and published sales materials.
- Conversations with clients — but never to obtain confidential information about competitors' bids.
- Industry surveys from reputable consultants or firms.

### NEVER USE

- Information about a competitor that someone offers to sell.
- A competitor's confidential or proprietary information — or anything similar belonging to anyone else — however it reaches you.
- Confidential or proprietary information disclosed by new hires from their prior employers, in any form.

If confidential competitor information reaches you unsolicited — a misdirected email, an attachment in a data room, a document left in a meeting room — do not read further, do not forward it, and contact Legal immediately. How we handle a competitor's secrets says everything about how we would handle a client's.

**Q. We hired an engineer from a competitor. She still has their pricing template on a personal drive and offered to share it “since everyone does it.” Accept?**

**A.** No. That template is her former employer's confidential property. Using it exposes Tectoni and her to legal action — and tells every Tectonian their own confidential work would be treated the same way elsewhere. We hired her skills, not her files.

**Q. A procurement officer accidentally attached a competitor's priced bid to an email to us during a live tender. Can we peek — it's their mistake, not ours?**

**A.** No. Stop reading the moment you realise what it is, notify Legal, and let them inform the client of the error. Using it could disqualify our bid and damage us far beyond one tender.

### KEY POLICIES

Competition Compliance Standard · Confidential Information Standard

## Anti-money laundering · trade controls

### Anti-money laundering

Money laundering is the process of disguising the proceeds of crime as legitimate funds. Tectoni will not be used as a channel for it. We comply with applicable anti-money laundering laws, we know who we do business with, and we transact through transparent, traceable means. Our AAGG Policy requires everyone acting for Tectoni to conduct themselves ethically and comply with all applicable anti-corruption and anti-money laundering laws.

#### YOUR COMMITMENT — WATCH FOR RED FLAGS

- Requests to receive or make payments in cash, from or to third parties unrelated to the contract, or through countries unconnected to the transaction.
- Overpayments followed by refund requests; complex payment structures with no commercial logic; counterparties reluctant to identify their beneficial owners.
- To escalate any such flag to Finance and Compliance before proceeding — never after.

### Sanctions and trade controls

Operating across seven countries and importing specialised equipment means customs, import/export and sanctions rules are part of our daily reality. We comply with applicable trade controls and international sanctions: we screen counterparties where required, declare equipment and samples honestly at every border, and never structure shipments or contracts to evade duties or restrictions.

**Q. A new client offered to pay a large mobilisation advance in cash, “to move quickly.” Good news?**

**A.** Treat it as a red flag, not a windfall. Large cash payments are the signature of laundering. Route the request to Finance and Compliance — a legitimate client can pay through a bank.

**Q. A clearing agent suggests declaring our geophysical equipment as “household goods” to lower duties on a border crossing. Everyone does it, he says.**

**A.** No. Misdeclaration is smuggling — a criminal offence that can cost us the equipment, the project and our reputation with every customs authority in the region. Declare honestly, pay the correct duty, and plan for it in the budget.

#### KEY POLICIES

AAGG Policy · Finance & Treasury Standard ·  
Import/Export Procedure

## Data protection and privacy

In the course of our work we hold personal data about employees, applicants, clients' staff, community members and business contacts. We respect the privacy of every one of them. We collect and process personal data lawfully, fairly and transparently; only for legitimate business purposes; only as much as we need; and only for as long as we need it.

### OUR COMMITMENT

- We comply with applicable data-protection laws in every country where we operate, including Uganda's Data Protection and Privacy Act.
- We secure personal data against unauthorised access, loss and misuse, and limit access to those who need it for their role.
- We respond honestly and promptly to individuals exercising their rights over their own data.

### YOUR COMMITMENT

- To access personal data only when your role requires it, and never share it — internally or externally — without a proper basis.
- To collect only the personal data genuinely needed for the task — including in community surveys, HR files and site records.
- To report any suspected loss, theft or accidental disclosure of personal data immediately, so we can contain it and meet any notification duties.

**Q. For a resettlement-related survey we collected household details, incomes and photographs. A third party has asked us to share the raw dataset “for research.” Can we?**

**A.** Not without a lawful basis, the data subjects' consent where required, and management and Legal approval. Community members entrusted that data for one purpose. Using it for another is exactly what privacy law — and our Code — prohibits.

**Q. I lost a field tablet that contains crew records and client contact details. It's password-protected. Do I need to report it?**

**A.** Yes, immediately. Password protection reduces the risk but does not eliminate the duty. IT can remote-wipe the device, and Compliance can assess whether anyone must be notified.

### KEY POLICIES

Data Protection Standard · IT & Information Security Policy · HR Records Procedure



# 05

## WHEN GOVERNMENT IS OUR CLIENT

Ministries, public utilities and development agencies are among our most important clients — and when the government is our client, special laws and rules apply that are considerably stricter than those governing commercial work. Every Tectonian working on government contracts must know and abide by them. Employees working in both sectors must clearly understand which rules apply where. The topics in this chapter are a starting point, not a substitute: if you work on government-funded projects, you must familiarise yourself with the procurement laws and regulations that govern them.



TRUSTED ON PUBLIC INFRASTRUCTURE

### IN THIS CHAPTER

The AAGG Policy — our stricter standard · Organisational conflicts of interest · Accuracy of reports, time charging and unallowable costs · Change orders

## The AAGG Policy — our stricter standard

Tectoni's Anti-Corruption, Anti-Money Laundering, Gifting and Government Ethics Policy (the "AAGG Policy") governs every interaction we have with government officials and entities. It applies to Tectoni employees, independent contractors, subcontractors, affiliates and anyone acting on Tectoni's behalf, regardless of their employment or contractual position ("Representative Parties").

The core rule is absolute. No Representative Party shall, directly or indirectly, promise, authorise, offer or pay anything of value — including gifts, travel, hospitality, charitable donations or employment — to any government official, or to any third party connected to one (a family member, staff member or significant other), in order to improperly influence any act or decision of that official or to otherwise improperly promote Tectoni's business interests.

### YOUR COMMITMENT ON GOVERNMENT WORK

- To assume that no gift, hospitality or favour to a public official is permissible without prior written approval from the Compliance Officer.
- To select only subcontractors, temporary workers, agents and suppliers who act consistently with the standards of this Code.
- To keep interactions with officials professional, documented and transparent — decisions must be winnable on merit and defensible in daylight.
- To report any request or hint from an official for personal benefit, employment for a relative, or a donation to a chosen cause — these are solicitations, and they must reach Compliance immediately.

*"What is a courtesy in the private sector can be a crime in the public one. When in doubt on government work, the answer is: ask first."*

AAGG POLICY PRINCIPLE

**Q. A ministry engineer supervising our contract mentioned his nephew is looking for an internship. We do run internships. Offer one?**

**A.** Not without Compliance approval — and almost certainly not during a live contract with his ministry. Employment for a relative of a decision-maker is "anything of value" under the AAGG Policy. Politely explain that internships follow an open, merit-based process.

**Q. We want to donate boreholes to a community as CSR. A local official suggested channelling the donation through a foundation he chairs. Acceptable?**

**A.** No. A charitable donation routed through an official's own vehicle is a classic corruption structure, whatever the intention. Genuine CSR is welcome — done directly, transparently, with Compliance review.

### KEY POLICIES

AAGG Policy · Anti-Corruption & Bribery Policy · EBG Policy

## Organisational conflicts of interest (OCI)

Because Tectoni performs work for government entities, we are subject to rules on organisational conflicts of interest. An OCI arises when, because of a pre-existing business relationship or project, Tectoni has a potential unfair competitive advantage — or could be seen as not impartial — in obtaining or performing other government-related work.

Three patterns matter most in our business. **Biased ground rules:** if Tectoni helps a government client define the scope or specifications for future work, we may be barred from bidding on that work. **Unequal access to information:** non-public information gained on one government project must never advantage us in a competition for another. **Impaired objectivity:** we cannot impartially evaluate or supervise work if we, or a related party, performed it.

Critically, an OCI exists even where there is only the *potential* for one of these elements to occur. All OCIs, actual or potential, must be disclosed to the government client. All employees on government-funded projects are required to complete specific OCI training — how to identify them, avoid them, and what to do when they exist.

### YOUR COMMITMENT

- To screen every government pursuit for OCI at the earliest stage — before bidding, before teaming, before scoping discussions.
- To disclose promptly: to your supervisor and Legal internally, and through them to the government client.
- To respect information barriers put in place to manage a disclosed OCI, without exception.

**Q. We wrote the geotechnical scope of works for a ministry's dam tender as part of a consultancy. Can we now bid for the investigation contract itself?**

**A.** Almost certainly not without disclosure and the client's explicit clearance — we helped set the ground rules. Raise it with Legal immediately. Winning that tender undisclosed could void the contract and bar us from future government work.

**Q. On one government project we learned the client's internal budget for a future phase. Our bid team for that phase wants the number. Share it?**

**A.** No. That is unequal access to non-public information — a textbook OCI. Tell Legal; they will decide what must be disclosed and whether an information barrier or withdrawal is required.

### KEY POLICIES

AAGG Policy · OCI Training & Disclosure Procedure · Legal Review Protocol

## Accuracy of reports · time charging · unallowable costs

### Accuracy of information and reports

Providing inaccurate or misleading information or reports to a government client is illegal — full stop. All reports, data, information and invoices submitted to government clients must be complete and accurate. Review them carefully before submission; on government work there is no such thing as a harmless rounding-up.

### Time charging

Different government contracts may prescribe special time-charging practices, but two rules never bend: it is not permissible to charge a customer for hours not actually worked, and it is not permissible to charge time to one contract when the hours were worked on another. These rules apply regardless of any direction to the contrary from a supervisor, and regardless of contract type. All time must be reported properly, accurately and precisely.

### Unallowable costs

Reasonable costs incurred on reimbursable government contracts can generally be charged as allowable. But certain costs are “unallowable” and can never be charged — such as alcohol, political contributions, and (in most circumstances) first-class travel. Before allocating time or expense to a cost category, be sure it is properly and accurately categorised.

**Q.** My supervisor told me to book this week's hours to a government contract with budget left, though I worked on a different project. He says it “evens out over the year.” Do I comply?

**A.** No. Mischarging time on government contracts is illegal regardless of who instructs it, and “evening out” is not a defence — it is a pattern. Record the truth and report the instruction through Chapter 1 channels. You are protected.

**Q.** During a government project celebration dinner we bought drinks for the team. Can that go on the project's reimbursable costs?

**A.** No. Alcohol is an unallowable cost on government work. Book it to the correct internal category — never to the government contract.

#### KEY POLICIES

AAGG Policy · Time Charging Procedure · Project Cost Accounting Standard

## Change orders

When government representatives request work that is different from, or in excess of, what the contract prescribes, one discipline protects everyone: obtain the Contracting Officer's written direction before proceeding. We must always strive to satisfy our clients — but on government work, an undocumented “yes” can mean performing work we are never paid for, and can even expose the requesting official and Tectoni to audit findings.

Failure to give proper and timely notification when a contract change is encountered could jeopardise Tectoni's ability to obtain compensation for the changed work. Every Tectonian on a government contract must understand what to do, and when, if the government changes its requirements: recognise the change, notify promptly and formally, and proceed only on written direction from someone with authority to give it.

### YOUR COMMITMENT

- To know your contract's change and notification clauses before fieldwork begins — they are part of the mission brief, not the small print.
- To treat verbal instructions from any client representative as a trigger for written confirmation, never as authority in themselves.
- To record changed conditions (ground conditions, access, scope growth) contemporaneously, so the change file is built from facts, not recollections.

**Q. On site, the client's resident engineer asked us to drill two extra boreholes “while the rig is here — we'll sort the paperwork later.” It's efficient. Do we drill?**

**A.** Not yet. Notify your project manager, who will seek written direction from the Contracting Officer. If the client genuinely wants the boreholes, the instruction takes hours to issue — and it is the difference between paid work and a donated rig.

**Q. Ground conditions differ materially from the tender documents and our costs are climbing. The client's team is friendly and says “keep going, we'll be fair.” Is that enough?**

**A.** No. Changed conditions require formal, timely written notice under the contract. Friendly intentions do not survive audits, staff rotations or disputes. Paper the change now — it protects the client's team as much as ours.

### KEY POLICIES

Contract Review Procedure · Change Management Procedure · Project Records Standard

# 06

## WE ARE COMMITTED TO EXCELLENCE

Ethics and excellence are the same discipline wearing different clothes. A firm that tolerates sloppy work will eventually tolerate sloppy conduct — and a firm that questions, simplifies and improves everything it does will find that integrity comes naturally, because nothing is hidden in complexity. This chapter sets out our quality commitment and the Tectoni Algorithm: five disciplines of relentless improvement that every Tectonian is expected to practise.

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### IN THIS CHAPTER

Right-first-time delivery and quality · The Tectoni Algorithm — five disciplines of improvement · The whole client experience



## Right-first-time delivery and quality

Our clients build permanent structures on our data. That is why quality at Tectoni means right-first-time: quality and safety are planned into simple, repeatable procedures — not inspected in at the end. Our Integrated Quality Management System (ISO 9001:2015) turns that principle into controlled, auditable practice on every project.

### OUR COMMITMENT

- We deliver what was agreed, when it was agreed, to the standard agreed — and when we cannot, we say so early and honestly.
- We maintain an unbroken, documented chain of custody for every sample and dataset, from field to laboratory to report.
- We verify competence rather than assume it, and invest continually in the training and equipment our standard requires.
- We treat every nonconformity as information: reported openly, investigated honestly, corrected permanently.

### YOUR COMMITMENT

- To capture records right-first-time at source — never reconstructed from memory.
- To follow the method statement, the Inspection & Test Plan and the hold points; and to raise your hand when they cannot be followed, rather than improvising silently.
- To report ground conditions and problems as they actually are. When the ground contradicts the model, believe the ground.
- To own your deliverables by name — every log, test, calculation and report at Tectoni has a person, not a department, standing behind it.

*“Precision they can build on, delivered safely, exactly as agreed. That is the whole promise — and everything in this chapter exists to keep it.”*

### THE TECTONI PROMISE

**Q. A result looks anomalous and re-testing would delay the report by two days. The client is pushing. Smooth it over?**

**A.** No. An anomaly is exactly the data point that matters most. Flag it, re-test or qualify it transparently, and tell the client why. Two days late and right beats on-time and wrong — every time, on every project.

### KEY POLICIES

Integrated QMS Manual (TAL-IQMS-001) ·  
Operation Absolute Resolve (TAL-OAR-001) · ITP Framework



## The Tectoni Algorithm — five disciplines of improvement

Excellence is not a mood; it is a method. The Tectoni Algorithm adapts a five-step formula proven in some of the world's most demanding manufacturing and technology environments, and points it at everything we do — field procedures, reporting, tendering, administration. Practised honestly, it strips away inefficiency and leaves only what creates value for the client. Practised together with this Code, it does something more: it removes the clutter in which poor conduct hides.

### 1 • Question every rule

Take nothing at face value. Every rule, requirement and assumption earns its place or loses it — including the “rules” that arrived with somebody's habits rather than any actual obligation. Many organisations operate inside layers of inherited constraints; some are essential, others are handcuffs. When you ask why a process exists and the answer is “that's how it's always been done,” you have found an opportunity for major improvement. Even seemingly immovable requirements can change when you understand the context, incentives and history that shaped them — the practitioner who examines a rule closely will often find room to renegotiate it that everyone else assumed was rock. One caution, and it is absolute: the rules of law, safety and this Code are not inherited clutter. They are the load-bearing walls. Question everything else.

### 2 • Delete every possible step

Every step in a process is a cost, a delay and an opportunity for error — and sometimes for misconduct. So map each process end to end, then ask of every single step: does this create value for the client? Keep and improve the steps that do. Remove, automate or move behind the scenes the ones that don't. If deleting a step breaks nothing, it was waste; if you never have to add anything back, you didn't delete enough. Fewer steps do not just mean faster work — they mean fewer places for a signature to be skipped, a sample to be mislabelled, or a shortcut to be quietly taken.

### 3 • Simplify and optimise what remains

Only after questioning and deleting do we optimise — otherwise we are perfecting waste. Simplicity is a quality standard and an ethical one: a method statement a tired operator can follow at four in the morning is safer and more honest than a clever one nobody fully reads. Strip plans, forms and briefings to the essential. Replace mountains of material with guidance people can actually remember and act on. Complexity is where errors breed and accountability blurs; simplicity is where both are impossible to hide.

## The Tectoni Algorithm — continued

### 4 • Accelerate cycle time

Speed matters — but the speed that matters is cycle time: the total time from a client's need to a delivered result, not merely how fast anyone's hands move. In most businesses the gap between cycle time and actual touch time is enormous, and that gap is where opportunity lives. A report that takes three weeks to issue may contain only days of real work; the rest is waiting — for data to be handed over, for a review to start, for teams to reconcile fragmented information. We close that gap the disciplined way: shared, real-time visibility of project status across field, laboratory, engineering and commercial teams, so decisions are made on the same facts, bottlenecks surface early, and money and effort are not trapped in queues. Accelerating the loop has a second benefit: weak points reveal themselves under tempo. Delays, misalignments and hidden constraints cannot survive a fast, honest cycle.

### 5 • Automate last

Automation is the amplifier, not the fix. Applied to a process that is not understood, it locks the flaws in and makes them harder to see — the most sophisticated system in the world becomes a bottleneck when nobody fully understands the job it was built to do. The disciplined order is fixed: map the process, question it, delete, simplify, optimise through repetition — and only then automate, so the machine multiplies a process that is already clean. The most successful operations learned their business by hand before they wrote the software: do the work manually until you understand every step, and only then hand the perfected process to the machine. At Tectoni this applies to everything from data processing pipelines to automated reporting: we automate what we have mastered, never what we are avoiding.

*“Break everything into its smallest parts, study each one closely, and ask why it exists at all. That level of scrutiny exposes hidden inefficiencies — and opens the door to better, often surprising solutions.”*

THE TECTONI ALGORITHM — WORKING PRINCIPLE

#### YOUR COMMITMENT

- To ask “why does this step exist?” as a habit, and to raise improvement proposals rather than resign yourself to inherited friction.
- To never confuse the Algorithm with corner-cutting: law, safety and the Code are outside its scope, permanently.
- To bring the same scrutiny to your own work that you would apply to anyone else's — question your own rules first.
- To measure improvements by evidence — cycle time, error rates, client outcomes — not by enthusiasm.

## The whole client experience

A technically perfect report is not the whole product. The client's experience of Tectoni includes every touchpoint: the first enquiry, the clarity of our proposal, the conduct of our crew on their site, the readability of our deliverables, the speed of our answers, the honesty of our invoicing, and the way we behave when something goes wrong. Excellence means owning that entire journey — because friction anywhere in it taints everything, and because friction, once found, is opportunity.

### Be so good they talk about you at dinner

We do not want Tectonians following scripts; we want them reading situations and solving problems so well that clients tell the story afterwards. One memorable standard beats a thousand pages of procedure: **be so good they'll talk about you at dinner**. That kind of service does not come from a manual — it comes from people who understand the intent and are trusted to act on it.

### Use your own product

The fastest feedback loop is firsthand. Leaders and engineers at Tectoni are expected to regularly experience our own outputs as a client would: read the report cold, sit through our own site induction, follow our own data portal, ring our own office with a question. What frustrates you will be frustrating our clients — find it before they do.

### Urgency and accountability

Excellence runs on rhythm. The most important problems get named, assigned to a small team with a clear goal, and reviewed at a fixed, frequent cadence by leaders who know the details — so progress is real, prepared and honest, and nobody expects credit for effort alone. The expectation, always, is progress. What we improve today becomes tomorrow's baseline; new expectations and competitors will keep emerging; the advantage belongs to whoever stays in the loop of testing, learning and adjusting.

**Q. My part of the project ends when the data is handed to reporting. The report was late to the client, but my data was on time. Not my problem, right?**

**A.** It is everyone's problem. The client experiences one Tectoni, not our internal handoffs. Ask how you can set the next person in the chain up to succeed — that question, asked routinely by everyone, is what makes the whole journey excellent.

**Q. A client mentioned our reports are technically excellent but hard for their board to digest. Our format follows our template. Change it?**

**A.** Yes — treat it as gold-dust feedback on the whole product. Add the plain-language summary the board needs. The template serves the client, not the other way round; question that rule like any other.

#### KEY POLICIES

Integrated QMS Manual · Client Feedback Procedure · Operation Absolute Resolve

## How we operate — Operation Absolute Resolve

This Code tells you what is right. Its companion doctrine, **Operation Absolute Resolve — The Tectoni Operating System** (TAL-OAR-001), tells you how we get it done: how Tectonians plan, lead, execute and win on every site, on every project, every time. The two documents share one aim — a firm whose conduct and whose work are equally beyond doubt — and they are read together. Where they meet, this Code always prevails.

The doctrine's heart is ten tenets, each pairing a battle-tested discipline with our engineering reality:

### THE TEN TENETS OF ABSOLUTE RESOLVE

- **Commander's Intent** — everyone knows the why; we lead by intent, not micromanagement.
- **Extreme Ownership** — no orphaned problems; every deliverable has a named owner.
- **Prioritise & Execute** — when everything is urgent, attack the highest threat first.
- **Cover & Move** — one team, one fight; departments cover each other toward the mission.
- **Simplicity** — if it isn't simple, it breaks under stress.
- **Slow Is Smooth, Smooth Is Fast** — rehearsal and standards are speed, not bureaucracy.
- **Every Operator a Sensor** — see it first, report it fast; believe the ground.
- **Brief · Execute · Debrief** — nothing starts without a brief; nothing ends without an honest debrief.
- **Safety Is the Mission** — anyone can call the stop, and will be backed for it.
- **Earn It Every Day** — standards, not feelings; excellence is re-earned each morning.

Every piece of Tectoni work runs on one repeating loop — **Plan · Brief · Execute · Debrief** — and every process in the doctrine is anchored to our certified ISO 9001:2015 and ISO 45001:2018 management systems, so culture is provable, not decorative.

*"Elite militaries do not win on courage alone, and elite ventures do not win on inspiration alone. Both win on discipline."*

OPERATION ABSOLUTE  
RESOLVE

#### Q. Where can I read the full doctrine?

A. Operation Absolute Resolve is an internal controlled document, issued to all Tectonians at induction and available alongside the Integrated QMS Manual. Ask your supervisor or the QMS Coordinator for the current revision.

#### Q. If the doctrine and this Code ever seem to conflict, which do I follow?

A. This Code. The doctrine itself sets the order of precedence: law first, then contract, then the QMS and HSE systems, then doctrine — and the Code's ethical standards bind all of them.

#### KEY DOCUMENTS

Operation Absolute Resolve (TAL-OAR-001) · Integrated QMS Manual (TAL-IQMS-001) · HSE Management System

# 07

## WE PROTECT OUR ASSETS

Tectonians manage and use significant information every day, and we are often entrusted with highly confidential data by our clients, suppliers and partners. Our equipment, our funds, our data and our name are the tools every Tectonian depends on. We protect our own and others' information with the utmost care — and we are prudent and vigilant, on and off the job.

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### IN THIS CHAPTER

Confidential information · IT and data security · Intellectual property and company assets

## Confidential information

Confidential data includes all information about Tectoni and its business that has not been made public — and all non-public information about suppliers, contractors, clients and partners that reaches us in the course of our work. Ground investigation data, designs, tender strategies, rates, project pipelines, personnel records: in the wrong hands, any of these can damage Tectoni or the people who trusted us with them.

The obligation to maintain confidentiality continues even after your employment with Tectoni ends. And it cuts both ways: just as we protect what clients entrust to us, we never ask new joiners to bring — or use — the confidential information of their former employers.

### OUR COMMITMENT

- Managers ensure confidential and proprietary information is shared with other employees only on a need-to-know basis, with safeguards against unintended or deliberate misuse.
- We honour every non-disclosure obligation we sign, and we contract clearly so clients know how their data will be handled, stored and retained.

### YOUR COMMITMENT

- To share confidential information only with people entitled to it, inside or outside Tectoni — entitlement, not curiosity or convenience, is the test.
- To be vigilant in public: site data discussed in a hotel bar, a report open on a bus, a phone call in an airport lounge — each is a disclosure.
- To return or destroy confidential materials when a project or your employment ends, as our policies require.

**Q. A consultant friend asked me how a well-known dam project is “really going.” He works for a different client entirely. Harmless industry talk?**

**A.** No. Project status, findings and client relationships are confidential. Deflect warmly and change the subject — the friend who pumps you for client information today would not trust you with his own tomorrow.

**Q. I'm preparing a conference paper using data from a completed client project. It would showcase Tectoni's capability. Can I?**

**A.** Only with the client's written consent and management approval. Even anonymised data can be identifiable — a distinctive site is recognisable to anyone in the industry. Ask first; most clients say yes when asked properly.

### KEY POLICIES

Confidential Information Standard · IT & Information Security Policy · Contract Review Procedure

## IT and data security

Our information systems — servers, laptops, field tablets, instruments, email and cloud platforms — carry the most valuable thing we produce: trusted data. Protecting them is part of everyone's job, not just IT's. A single careless click can undo the discipline of an entire project team.

### OUR COMMITMENT

- We secure our systems with appropriate technical and organisational measures, and keep them updated against evolving threats.
- We back up project data so that no client deliverable depends on a single device or a single person.
- We plan for incidents: containment, recovery and honest notification of anyone affected.

### YOUR COMMITMENT

- To use strong, unique passwords and the security measures we require (such as multi-factor authentication), and never share credentials with anyone.
- To think before you click: phishing — a fraudulent message engineered to steal credentials or deliver malware — is the single most likely attack you will face. Verify unexpected requests, especially any that involve payments or credentials.
- To use approved systems for Tectoni work; personal accounts and unapproved apps put client data outside our protection.
- To protect devices physically — lock screens, secure storage in vehicles and accommodation, and immediate reporting of loss or theft.
- To report suspected security incidents immediately. Minutes matter; embarrassment never outweighs containment.

**Q. I received an email that looks like it is from our General Manager, urgently asking me to pay a new supplier account today. Something feels off. What do I do?**

**A.** Trust the feeling. This is the classic pattern of payment fraud. Do not pay, do not reply — verify by phone using a number you already have, and alert Finance and IT. A genuine leader will always prefer a verification call to a stolen payment.

**Q. Internet on site is poor, so I've been syncing project files through my personal cloud drive. It works well. Problem?**

**A.** Yes. Client data on personal accounts is outside Tectoni's security, backup and legal protection — and may breach our contract with the client. Talk to IT; there are approved offline-sync options designed exactly for poor connectivity.

### KEY POLICIES

IT & Information Security Policy · Acceptable Use Standard · Incident Response Procedure



## Intellectual property and company assets

### Intellectual property

Tectoni's methods, software, models, templates, databases, reports and accumulated know-how are assets built by years of Tectonian effort. We protect them: they are not to be shared, sold or reused outside Tectoni without authorisation. Equally, we respect the intellectual property of others — we license the software we use, credit the work we build on, and never knowingly infringe patents, copyrights or trade secrets. Work products created in the course of your employment belong to Tectoni, as your contract provides.

### Physical and financial assets

Rigs, barges, instruments, vehicles, funds and facilities exist for Tectoni's business. We protect them from loss, theft, damage and waste — and we do not use them for personal benefit or private business. Occasional, reasonable personal use of items like phones and laptops is acceptable where policies allow; diverting company resources, contacts or time to a private venture is not.

#### YOUR COMMITMENT

- To operate and maintain equipment with care — a calibrated instrument mistreated is a client's dataset corrupted.
- To spend Tectoni's money as carefully as your own, with honest records for every expense.
- To never use company assets, contacts or resources to start or support a private business or outside organisation.
- To report loss, theft or misuse of assets promptly.

**Q. On weekends our idle survey drone could earn me good money filming events. It would not affect my work. Can I?**

**A.** No. Company equipment cannot be used for private gain — insurance, liability, maintenance and reputation are all implicated the moment it lifts off for your client instead of ours. The same applies to vehicles, instruments and software licences.

**Q. I built a clever data-processing spreadsheet at work. I'm leaving Tectoni soon — can I take it with me?**

**A.** No. Tools created in the course of your employment are Tectoni's property, like the datasets they process. Take your skills and experience — they are genuinely yours — and leave the assets behind, as you would want your successor to do for you.

#### KEY POLICIES

Asset Management Standard · Acceptable Use Standard · Employment Terms — IP Clauses

# 08

## WE ARE COMMITTED TO SOCIETY

We are all responsible for the impact we have on other people, on society and on the environment. Tectoni strives to make a valued contribution to social progress — through projects that provide the building blocks of development, through the taxes we pay and the employment we create, and through respectful, honest relationships with the communities that host our work. Operating responsibly is the only way we can achieve our goals and keep the trust of our stakeholders.

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### IN THIS CHAPTER

Human rights and modern slavery · Environment · Communities

## Human rights and modern slavery

We respect the dignity and human rights of our workforce, our business partners, the societies in which we live and work, and everyone potentially affected by our activities. We expect our business partners to share this commitment — and we use our business relationships to advance it, including with the security providers who protect our sites and people.

We have zero tolerance for any form of modern slavery, including forced, compulsory or child labour — in our own operations and in our supply chain. We respect our people's right to choose whether to join a union and to bargain collectively.

### OUR COMMITMENT

- We consider how our actions may affect the human rights of others, and understand and address the human-rights risks that arise from our activities.
- We implement effective local grievance mechanisms, so that anyone affected by our work can raise concerns and be heard.
- We engage business partners to respect human rights and adhere to established international standards.

### YOUR COMMITMENT

- To speak up in the event of an actual or suspected human-rights breach — by Tectoni, a partner, a supplier or a security provider.
- To watch for the signs of forced labour in our supply chain: withheld identity documents, recruitment-fee debts, wages paid to someone other than the worker, workers who cannot leave.
- To treat every worker on a Tectoni site — whoever employs them — with the dignity this Code demands.

**Q. A labour subcontractor's workers told our crew they “owe” the recruiter their first two months' wages and surrendered their IDs to him. Is this our business?**

**A.** Absolutely. Debt bondage and document retention are markers of forced labour — on our site, under our supervision. Report it immediately; we will engage the subcontractor, and if it is not corrected, end the relationship and report as the law requires.

**Q. A security guard at our compound used excessive force against a trespassing teenager. The guard works for a security company, not Tectoni. Do we act?**

**A.** Yes. Security providers acting for Tectoni must meet our human-rights standards. Report it at once: the incident must be investigated, the injured person supported, and the provider held to account — contractually and, where warranted, legally.

### KEY POLICIES

Human Rights Policy · Social Performance Policy · Supplier Standards

## Environment

We are stewards of the very earth we study. Tectoni is committed to environmental stewardship and to minimising harm through responsible resource management across our operations — and to understanding and addressing the environmental challenges at our projects, from resource efficiency to the prevention of incidents. We recognise the potential impacts of climate change on our operations and our communities, and we work to address them.

### OUR COMMITMENT

- We conduct our work with respect for legally designated areas, and we do not explore or operate in World Heritage areas.
- We identify and assess the potential impacts of our activities on shared natural resources — land, air, water, energy and biodiversity — and take action to mitigate them.
- We develop and implement processes to track, manage and report our environmental performance, and take action to reduce our carbon footprint.
- We engage stakeholders on environmental risks, opportunities and performance.

### YOUR COMMITMENT

- To follow the environmental controls in every RAMS and method statement — containment, waste management, spill response — as strictly as the safety controls.
- To restore work sites: backfilled pits, decommissioned boreholes, managed drilling fluids, riparian environments left as we found them or better.
- To report every spill, release or environmental near-miss, however small.

**Q. Disposing of used drilling fluid properly means trucking it a long distance at real cost. The bush around the site would “absorb it.” Nobody would know. What do we do?**

**A.** We truck it. “Nobody would know” is never a control measure — and we would know. Improper disposal poisons land and water our host communities depend on, and betrays everything our environmental commitment claims.

**Q. Our proposed access route crosses a wetland fringe not marked in the client's drawings. Taking it saves two days. Proceed?**

**A.** Stop and assess first. Wetlands are protected in most of our countries of operation, marked or not. Raise it with the project manager and the client — an alternative route or a permit is the professional answer; an unpermitted crossing is an incident.

### KEY POLICIES

Environmental Policy · RAMS Framework · Waste Management Procedure

## Communities

Every Tectoni site sits in somebody's home. We build respectful relationships with local stakeholders, openly and honestly, and we strive to make a valued contribution to social progress — through the infrastructure our science enables, the taxes we pay, the employment and business opportunities we create, and the social development we support in the societies where we operate.

### OUR COMMITMENT

- We work constructively with local communities at every stage of an operation's lifecycle to enhance socio-economic resilience.
- We identify actual and potential impacts of our activities on host communities and act to avoid or mitigate them.
- We promote inclusive community engagement, ensuring vulnerable groups and Indigenous Peoples have the opportunity to take part.
- We report, investigate and respond to community complaints and grievances — and we honour and follow through on commitments agreed with communities.
- We recognise and respect the cultures and heritage of our host communities.

### YOUR COMMITMENT

- To conduct yourself in host communities as a guest: courteous on the road, honest in every dealing, mindful that you are the most visible Tectonian many people will ever meet.
- To channel community requests and complaints into our grievance process, so they are answered properly — never brushed aside, and never settled informally with cash.
- To hire and buy locally where quality and fairness allow, and to follow our procedures when doing so.

**Q. A farmer says our drilling crossed his land and damaged crops. The crew disagrees. He is asking for compensation at the site gate. Pay him something to keep the peace?**

**A.** No informal cash — ever. Log the grievance, photograph the area, and let the process establish the facts. If we caused damage, he will be compensated fairly and documented properly. Informal payments create injustice in both directions and invite endless claims.

**Q. During community meetings, elders asked that our crews avoid working near a burial site on certain days. It would slightly complicate our schedule. Do we accommodate?**

**A.** Yes. Respecting cultural heritage is a commitment, not a courtesy — and a schedule that cannot absorb respect is a bad schedule. Agree the arrangement formally and honour it without exception.

### KEY POLICIES

Social Performance Policy · Human Rights Policy · Community Grievance Procedure

# 09

## WE CARE FOR OUR COMMUNICATION

Trust begins with communication: we are trusted because we do what we say — and because what we say is accurate, consistent and authorised. How Tectoni speaks to the media, to the market and on social platforms shapes the reputation every Tectonian depends on. One company, one voice, many proud messengers.

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### IN THIS CHAPTER

Media, social media and our brand

## Media, social media and our brand

### Speaking for Tectoni

Only authorised spokespersons speak to the media on Tectoni's behalf. If a journalist, analyst or blogger contacts you, refer them to management — promptly and politely, without commenting “off the record.” There is no such thing. The same applies in a crisis: accurate, coordinated communication protects everyone; improvised communication endangers them.

### Social media

We encourage Tectonians to be proud of their work — and careful with it. When using social media, act in a way consistent with our values. Never disclose confidential or client information (including photographs of sites, data, documents or people without permission); make clear that personal opinions are your own; and never speak in Tectoni's name unless authorised. A post is a publication: permanent, searchable and attributable, long after the moment has passed.

### Our brand

The Tectoni name, logo and visual identity are assets — use them according to our brand guidelines, and never in ways that could embarrass the company or associate it with causes, claims or content it has not endorsed. Every proposal, report and site sign carrying our mark is a promise of the standard behind it.

#### YOUR COMMITMENT

- To refer media enquiries to authorised spokespersons, always.
- To post nothing about clients, projects or colleagues that this Code would not allow you to say in public — because that is exactly what a post is.
- To use approved templates and brand assets, keeping our identity consistent and professional.

**Q. I'm proud of our barge operation and want to post drone photos of the site on my personal profile. The project is public knowledge. OK?**

**A.** Ask first. Even on publicly known projects, clients control what images of their assets are published — and photos can reveal layout, equipment or people. Many clients happily approve; the asking is what makes it professional.

**Q. A journalist called me about an incident near one of our sites. I know the facts and could correct some errors in the story. Should I?**

**A.** No — refer them to management immediately. However well-intentioned, an unauthorised comment can create legal exposure and contradict official communication. Pass on what you know internally so the authorised response is accurate.

#### KEY POLICIES

Communications Policy · Social Media Standard · Brand Guidelines



# 10

## LIVING THE CODE

A code that is not lived is decoration. This final chapter sets out what we expect of our leaders and our business partners, how breaches and waivers are handled, and where to get help. It ends where the Code begins — with each Tectonian's personal commitment.



WE MAKE IT HAPPEN

### IN THIS CHAPTER

Our leaders · Our business partners · Breaches, waivers and acknowledgement · Getting help

## Our leaders · our business partners

### What we expect of every leader

We expect every leader across our business to be a strong role model for acting with integrity and promoting a safe, responsible and ethical culture. Leaders must live the values and act in accordance with the Code and its spirit; promote our values, Code and policies and define expected behaviours; and look for opportunities to grow our business in a manner consistent with both.

#### LEADERS UPHOLD THE CODE BY

- Treating their teams fairly and with respect, and creating an environment where everyone feels comfortable speaking openly without fear of retaliation — listening to concerns, taking them seriously, and addressing them.
- Identifying, assessing and managing risks, and ensuring their people participate in training on the Code and relevant policies.
- Being clear on what is and is not acceptable; holding their teams to account; and intervening when performance does not meet expectations.
- Recognising and rewarding people not only on what they achieve, but on how they achieve it.
- Setting clear, realistic goals; creating opportunities for people to develop and fulfil their potential; and reporting any breaches they observe or that are reported to them.

*“Culture is what leaders tolerate. Every standard in this Code is set — or unset — by what a Tectoni leader walks past without comment.”*

TECTONI LEADERSHIP  
PRINCIPLE

#### **Q. As a site supervisor, am I responsible for a subcontractor crew member's conduct under this Code?**

**A.** Yes — anyone under Tectoni's direct supervision follows the Code, and you are the leader on the ground. Brief them, hold them to it, and escalate if their employer will not support the standard.

#### KEY POLICIES

Supplier Standards · Anti-Corruption & Bribery Policy · Leadership Competence Framework

### What we expect of our business partners

Our business partners — suppliers, customers, joint ventures and their partners, service providers and other counterparties — matter to us, so we are fair, open and transparent with them, and we expect them to share our commitment to ethical, safe and responsible business.

#### IN PRACTICE

- We work only with partners who share our commitment to ethical business conduct, and we help them understand our expectations.
- We never ask a partner to act in a way that breaches the law, our values or our Code — or to operate in a manner that puts them or their workforce at risk.
- We take action if our business partners break the law, and we assert our influence over joint ventures we do not control to encourage conduct consistent with our values and Code.

## Breaches, waivers and acknowledgement · getting help

### Breaches

Regardless of the position of the person involved, we take breaches of the Code and our policies seriously. Depending on severity, consequences range from a warning to termination of employment — and may extend to anyone who knew about a breach and did not report it. Where laws are broken, Tectoni will cooperate with authorities as required.

### Waivers

Waivers of this Code are exceptional. Any waiver may be granted only by executive management with the concurrence of the Compliance Officer, must be documented, and will never be granted where it would breach law or regulation. No manager may “waive” the Code informally — if you are told the rules do not apply this time, that instruction is itself a breach.

### Acknowledgement

Every Tectonian is required to read the Code, complete assigned training, and acknowledge the Code on joining and periodically thereafter. By being part of Tectoni, you are agreeing to uphold this commitment.

### The Code and other documents

The Code is the centrepiece of Tectoni's guidance on ethical business conduct. It is supported by the policies referenced throughout, by our Integrated QMS, and by our operating doctrine, Operation Absolute Resolve. Where any conflict arises, precedence is: statutory and legal requirements; client contract; the Integrated QMS and HSE systems; then supporting doctrine. The Code's ethical standards are never subordinate — they bind all of the above.

### Getting help

**Q. Wherever you are, help is one step away:**

**A.** Your supervisor — or any manager above them  
Human Resources · Legal · HSSE · Finance  
Compliance Officer  
Hotline: **+256 39 3102940**  
WhatsApp: **+256 726 148 145**  
Email: **info@tectoni.com**  
Web: **tectoni.com**

*“Our continued commitment to our Purpose, our Values and this Code will help Tectoni take on any challenge with resilience — and stay focused on what we do best: delivering end-to-end solutions for our clients' most complex, mission-critical infrastructure projects that advance everyday life at scale.”*

**JOHN BOSCO LUBEGA —  
EXECUTIVE CHAIRMAN &  
FOUNDER**

### DOCUMENT CONTROL

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APPLIED EARTH SCIENCES

# WE MAKE IT HAPPEN

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