

COMPLIANCE POLICY STATEMENT

Transinvest Construction Ltd truly believes that its efficiency and future depend on the confidence the Company inspires in its customers, employees and partners. On that account, Transinvest Construction Ltd take the responsibility of complying with the strictest standards of compliance when doing business.

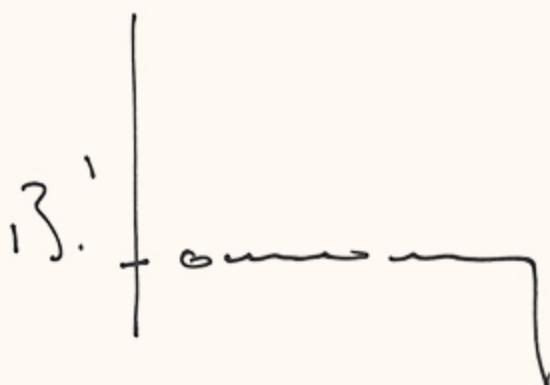
Employees at all level of the company shall implement this commitment and they should follow the guidelines provided by the Code of Ethics and the Compliance Program.

Transinvest Construction Ltd takes on itself to respect the following principles:

- ❖ Strict application of laws, regulations and internal standards.
- ❖ Political neutrality of the company.
- ❖ Honesty, fairness and transparency between employee and towards customers, shareholders and partners.
- ❖ Compliance with the rules that ensure free competition, and rejection of corruption in all its forms.
- ❖ Team spirit and Loyalty to the company.

To ensure that all the employees apply compliance as a core value of the company, Transinvest Construction Ltd shall manage the Compliance Policy through a code of ethics that everyone must respect and follow.

The implementation of these procedures will be reviewed on a regular basis and employees will receive regular training and precise instructions. Transinvest Construction Ltd believes that the best way to guarantee such an expectation is that every employee firmly considers the compliance as the main asset of the company and a guideline for their personal life.



Bertrand Hanauer
Chief Executive Officer
24 January 2019



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