

EMPLOYEE CODE OF CONDUCT

ACTING WITH INTEGRITY



I IAMA GROUP
ASSOCIATES

UNITES HAMAGROUP'S COMPANIES FOR A TECHNOLOGY DRIVEN REVOLUTION!

CORPORATE VALUES

LEADERSHIP

We believe that leadership is a team effort built upon the mutual respect and fair treatment of staff, candidates, clients and suppliers along with strong community relationships, all developed through honesty and accountability. By demonstrating integrity, humility and trustworthiness our companies stand apart from our peers and make positive impacts in our communities. Everyone in the organization has the opportunity to lead by example: showing respect in all interactions, taking responsibility for their own actions, inspiring trust through honesty and contributing to the success of our company.

PEOPLE

We have a personal and professional commitment to protecting the health and safety of our staff, candidates, clients, suppliers, service providers and the people in the communities in which we operate. Hama-Group believes that one person can make a difference, but that ongoing success requires a diverse team of dedicated people and companies working together to make a significant difference. Both the individual and combined strengths of our Family of Companies make Hama-Group the industry leader.

SERVICES

Our aim is to deliver value to our customers by providing the highest service levels possible. We deliver what we promise when we promise it, while always striving to improve and exceed customer expectations. Serving customers the right way is the only way we operate. Our customers, no matter their size, end market, or unique supply requirements, will never receive less than our absolute best effort to deliver excellence on all measures of quality and service. We strive to always be flexible and agile in servicing our customers' needs.

DIVERSITY

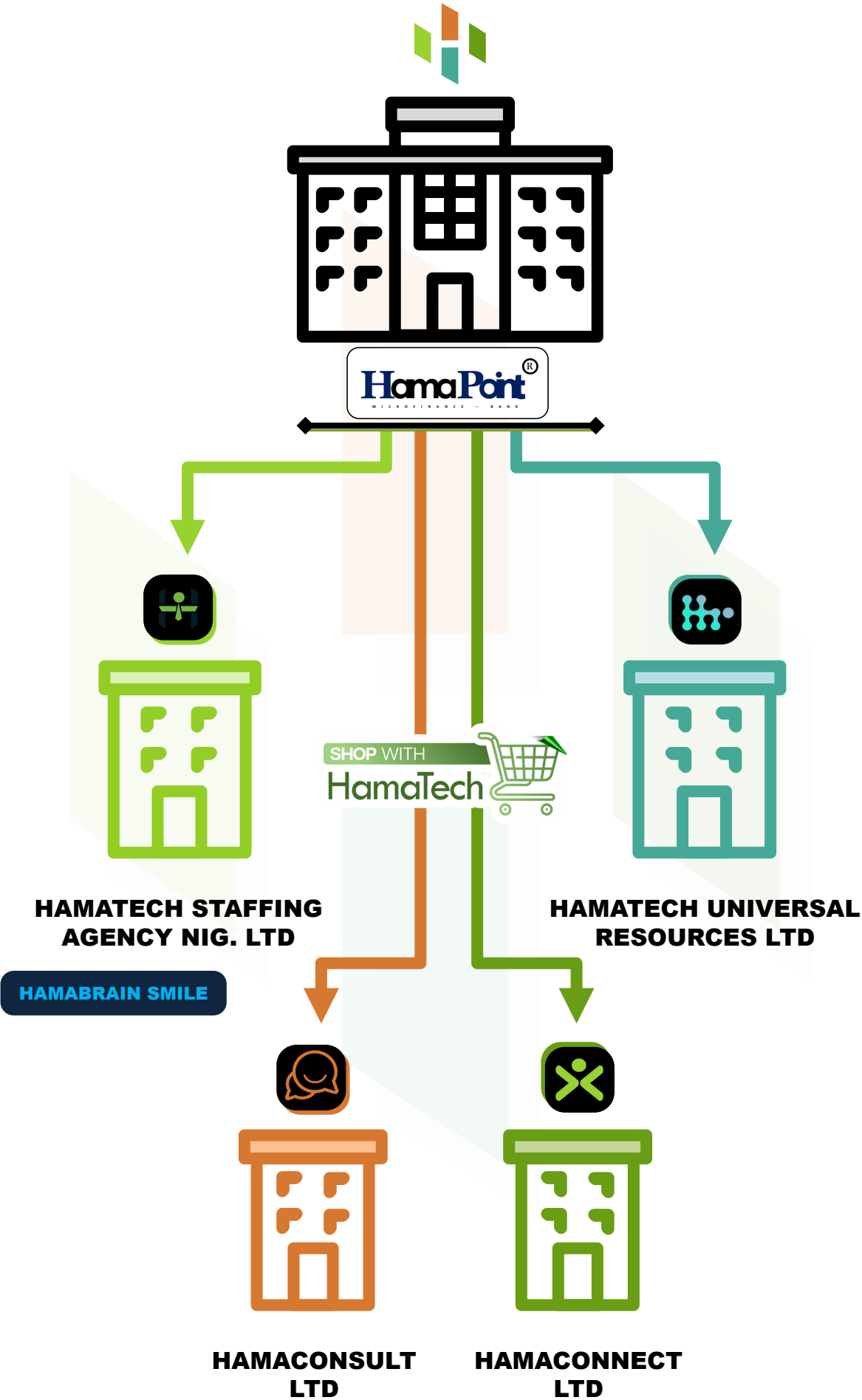
We value diversity in our people, products and services. Hama-Group is rooted in the unique and diverse cultures within our Family of Companies. This diversity of skills, services, knowledge and ideas is cultivated to generate new solutions and processing capabilities that enable us to adapt, innovate and rapidly respond to the evolving and precise needs of our clients. We also continue to focus on what we do well, where we do it best, and maintaining a strong local presence in our markets. We maintain our unique company culture and core values despite external pressures.

INTEGRITY

We expect our staff and candidates to conduct themselves with honesty and integrity in all of their dealings with clients, suppliers, service providers and the people in the communities in which we operate. Our responsibility and accountability to stockholders requires a diligent commitment to excellence and ethical business practices, ensuring sustainable profitability. Committed to honesty and fair dealings, we set the highest standards for business practices, adhere to applicable regulations, give back to our communities and ensure a safe and productive workplace for our employees.

PARTNERSHIP

Success is grounded in loyal and trusting partnerships with our customers, suppliers and communities. Building and maintaining strong relationships is critical to the way we operate and it is our goal to always develop and respect collaborative partnerships. Partnership means being committed to fair and trustworthy relationships with our customers, suppliers and communities so they may be the best they can be.



DEAR Hama-Group Associate's Team

Hama-Group's long-term success is founded on our ability to conduct our business activities and transactions with the highest level of integrity & ethical standards and in compliance with all applicable laws, rules and regulations. Whatever your position is at Hama-Group of companies, our company, stockholders and investors depend on you to perform your duties to the highest standards of ethics and judgment.

The attached **"Code of Conduct"** does not cover every issue that may arise, but it is an important resource that sets forth the core principles that govern all Hama-Group's staff, candidates and how we do businesses. I ask that you read, understand the **"Code of Conduct"**, comply with any specific policies and practices that apply to your job. If you have any questions, please contact your Agent or the Administration Coordinator.

Our history is the key to writing the story of our future. We strive to be the market leader, committed to setting industry leading standards in all measures of business performance and customer service. We encourage all of our staff and candidates to exhibit the highest levels of personal integrity, teamwork and appreciation for our diverse individual and company cultures. We believe in always treating people fairly, whether staff, candidates, supplier, service provider or client, while always looking for ways to improve our service and contribution to the communities in which we live and work.

Our daily behavior shapes Hama-Group of Companies, reputation and value, a valued member of the community and a responsible corporate citizen. We believe our people and diversity are the foundation of our success and we are committed to doing the right thing. Both what you do and how you do it are critical to our collective success.

Sincerely,



Husnu M. Husnu
President and Founder
Hama-Group Associates Limited

CODE OF CONDUCT

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WHO MUST COMPLY WITH THIS CODE OF CONDUCT ?

Everyone at all levels of Hama-Group Associates Limited, its Subsidiary and product has an obligation to know and follow this **Code of Conduct** (the “Code”), including:

- All members of the Hama-Group Management
- All staff and candidates of the Hama-Group Family of Companies

In addition to governing conduct by staff and candidates, this Code governs conduct between staff, candidates, clients, competitors and the numerous business providers (including suppliers, service providers, vendors, contractors and agents) who assist Hama-Group every day. Because we want our business providers, clients and investors to understand how we do business and what they can expect of us, this Code appears on the Hama-Group website and is available to the public.

To reaffirm their commitment to Ham- Group corporate values, Hama Group requires that all staff and candidates to sign and acknowledge this **Code of Conduct** at least once every two years.

If you are a director, officers or coordinator, you are responsible for leading by example and making sure your employees understand and comply with the **Code..**

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CONFLICT OF INTEREST

Staff and candidates are expected to remain loyal to Hama-Group and avoid conflicts of interest. Generally, a conflict of interest occurs when a personal or family interest interferes with our ability to perform our jobs effectively and objectively.

Any situation that might put us in such a position or create the appearance of bias should be avoided.

YOUR RESPONSIBILITIES

All conflicts of interest, including potential conflicts of interest, must be disclosed to your agent and the Corporate Legal Department at info@hamatechstaffing.com. You must comply with this **Code** as well as any local conflict of interest policies that apply to your role, which may be more restrictive than this corporate policy.

Any outside employment, business ventures or financial activities cannot interfere with the performance of your duties to Hama-Group of companies.

In avoiding conflicts of interest, you must comply with the following principles:

Do not hold a financial interest in or accept employment from an entity doing business with Hama-Group if it would or could conflict with the performance of your duties.

- Do not take any business related action for your personal benefit.
- Do not use Hama-Group equipment and resources for personal use.
- Protect Company assets as if they were your own.
- Do not take for yourself any opportunities that are discovered or advanced through the use of your position with Hama-Group or any of their property or information.
- No family member should report directly to another family member.

- Do not facilitate a conflict with one of our suppliers, service providers, clients or any government official, for example, by making a payment to an individual when you know the funds should go to his or her employer.

DISCLOSING AND ADDRESSING POTENTIAL CONFLICTS OF INTEREST

Hama-Group requires that you disclose, in writing any personal, business or other relationship that might constitute a conflict of interest or could potentially create a conflict of interest. Our policy is one of disclosure and review of potential conflicts and **prohibition of actual conflicts of interest. In some cases, disclosure may be all that is required.** In other cases, however, the facts may require additional action(s) to correct or avoid a conflict of interest. Some matters may require periodic monitoring by local management to ensure transactions remain at arm’s length. **In all cases, however, you MUST disclose all actual and potential conflicts of interest.**

Below we have listed certain activities and interests that present conflicts of interest or potential conflicts of interest that would have to be disclosed. This list is not exhaustive and you must also disclose any other personal interests that may give rise to a conflict of interest. Because it is impossible to describe every possible conflict of interest, Hama-Group relies on your good judgment to seek advice when appropriate and to adhere to high ethical standards in the conduct of your professional and personal affairs.

FINANCIAL CONFLICTS OF INTEREST

- Having a financial or management interest (as a candidate, staff, agent or director) in any client, supplier, service provider, competitor or any enterprise that you know or reasonably believe has or may have a business relationship with Hama-Group. A financial interest need not be disclosed if it involves less than 1% of the stock of a publicly held company, unless it constitutes a significant portion of your net worth.
- Engaging in business with or as a client, service provider or supplier of: Hama-Group, other than in the ordinary course as a candidate or a public consumer.
- Competing with Hama-Group.
- Maintaining concurrent employment with Hama-Group and with any other organization.

EXAMPLE	DISCLOSURE REQUIRED?
I...	All of these situations would require disclosure. A personal business, part-time job or director position for another company may interfere with an applicant or staff’s duties to Hama-Group. We need to conduct a conflict of interest review to be sure your business, part-time job or directorship position does not involve a competitor, supplier, service provider, customer or otherwise create issues of concern. If there are no issues or if any concerns can be effectively addressed, this would likely be approved.
...have(or am starting) my own business	
...want to take a part-time job	
...have been asked to serve as a director on the board of another company	

PERSONAL RELATIONSHIPS WITH PARTIES IN COMPANY-RELATED TRANSACTIONS

- **FAMILY MEMBERS:** Members of your immediate family (your spouse, domestic partner, minor children) or to your knowledge, your adult children, parents or siblings are employed by Hama-Group, a client, supplier, service provider or competitor of Hama-Group. If you disclose this type of conflict of interest, you should also report any later change in the reported relationship that puts you in a greater position to influence or be influenced by your relative’s employment.
- Arranging or facilitating any business transaction between any of your relatives and Hama-Group or between any of your relatives and any client, supplier, service provider or competitor of Hama-Group.

EXAMPLE	DISCLOSURE REQUIRED?
I...	These situations require disclosure. If an a candidate or staff’s family member works for Hama-Group client, supplier, service provider or competitor, there is a risk that this relationship may affect the applicant or staff’s business judgment. The family member’s employment must be disclosed so that the facts can be analyzed to determine if a conflict exists. Disclosure of family members who work for Hama-Group allows the Company to ensure that no conflict of interest, such as directly supervising a family member, exists.
...have a family member who works for Hama-Group	
...have a family member who works for a customer, supplier, service provider or competitor of Hama-Group	
...have a family member who owns properties leased by Hama-Group	

GIFTS, FEES, OR OTHER PERSONAL BENEFITS

- Accepting fees, commissions, or any other personal benefit (other than as quoted in the bullets below) from any person or business involved in any business with Hama Group
- Accepting any of the following from a current or would-be client, supplier, service provider, or competitor of Hama Group: excessive entertainment, meals, gifts, discounts, services, transportation, or favors that:
 - (i) obligate you or influence your decision-making in any way, regardless of value; or
 - (ii) might create the appearance of undue influence, unfairness, or impropriety.
- Offering or supplying entertainment, meals, transportation, gifts, or other favors to any person in a business relationship with Hama Group, other than what is reasonable and appropriate for the individuals involved and the business at hand.
- Soliciting or accepting money (or cash equivalents such as gift cards) for your personal benefit in any amount from a current or potential client, supplier, service provider, or competitor of Hama Group.
- Accepting an offer to participate, through a special allocation of shares, or otherwise receiving terms or benefits not generally available to the public in an offering of securities of, or underwritten by, any current or prospective client, supplier, service provider, or competitor of Hama Group or a firm that provides or may provide investment banking, financial advisory, underwriting, or other similar services to Hama Group or any other entity with which Hama Group has a business relationship.



EXAMPLE	DISCLOSURE REQUIRED?
I...	This does not need to be included on the Disclosure Form but you should disclose this to your agent at the time the invitation is extended and they will determine if you can accept.
...have been invited to lagos by a supplier to stay at a resort and play golf.	Your agent will consider the value of the invitation and whether business will be conducted on the trip..
...am responsible for selecting a product or service supplier for the company. One of the suppliers being considered is a company owned by my father.	You must disclose this relationship prior to selecting a supplier. You should consult your agent and the Administrative Coordinator. The best course of action is either for you not to be involved in the selection process or for your father's business to be eliminated from consideration. If ultimately your father's company is selected as a supplier, this would need to be included on the Disclosure Form.

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SAFETY

Safety is one of our core values at Reliance and that includes providing a safe and secure work environment. Maintaining a safe working environment is of the utmost importance and is everyone's responsibility

In avoiding conflicts of interest, you must comply with the following principles:

YOUR RESPONSIBILITIES

- All staff and candidates must familiarize themselves and comply with Hama-Group's posted safety rules and directives.
- Do not undertake work you are not qualified to perform.
- Observe all safety rules and procedures when operating machinery and equipment.
- Always wear Reliance-approved personal protective equipment (PPE) whenever required.
- Immediately report workplace accidents, injuries, illnesses and unsafe conditions to your agent to ensure prompt medical attention (if necessary), help prevent future incidents and ensure timely regulatory reporting (if required).
- Report all non-work-related injuries and illnesses that may affect the safe performance of your job prior to performing any work.
- Communicate our safety and health requirements to anyone coming onto Hama-Group property, including visitors, clients, suppliers, service providers, workers and contractors.



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ANTI-BRIBERY AND ANTI-CORRUPTION

The legal requirements of every state where Hama-Group does business prohibit improper payments to government officials. In addition, this Code prohibits Hama Group staff, candidates and anyone acting on the Company's behalf from offering, giving, accepting or receiving a bribe to/from anyone. We have built a reputation as a company that operates ethically & honestly and bribery & corruption have no place in our business. Bribery and corruption can cause irreparable harm to our good name, our business and the communities where we do business.

YOUR RESPONSIBILITIES

- Hama-Group staff and candidates may never offer, promise or give anything of value that could appear to be a payment — something that might encourage or reward someone for a decision to retain or obtain business.
- All Hama-Group staff and applicants required to complete anti-corruption training must become familiar and comply with the Company's Anti-Bribery and Anti-Corruption Policy, which provides more detail on the Company's policies regarding anti-bribery and anti-corruption. Any questions regarding such policies should be directed to the Company's Corporate Legal Group at hamatechstaffing.com.

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FRAUD, DISHONESTY OR CRIMINAL CONDUCT

Hama-Group does not permit fraud, dishonesty or criminal conduct. We value ethics, integrity and will not tolerate fraud, dishonesty or criminal conduct.

YOUR RESPONSIBILITIES

- We place a great deal of trust and confidence in our staff and candidates. In return, we expect you to act ethically and honestly in everything you do. Any use of fraudulent or illegal tactics violates that trust and carries potentially severe consequences, including discipline, up to and including termination. Hama-Group will also cooperate with authorities to prosecute any act of fraud, dishonesty or criminal conduct.
- Hama-Group prohibits fraud or dishonesty in connection with Company business, including taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice, criminal conduct or any violent activity on Company premises or while performing work for the Company.
- If any fraud, dishonesty or criminal conduct is detected or suspected of any staff, candidates or anyone doing business with the Company, such activities should be reported to the Group management or the Hama-Group Ethics Hotline (see Section 16).

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SAFEGUARDING CONFIDENTIAL INFORMATION

Information is one of our most valuable assets. Business records, customer information, financial information and intellectual property are Company assets that are essential to our operations. This information is not available to the public and includes sensitive business information (client, supplier, service provider and financial information) which has been entrusted to us. We all are responsible for keeping this information confidential.

YOUR RESPONSIBILITIES

- You may not use any information belonging to Hama-Group for your own personal gain. Confidential information may only be shared with Hama-Group staff, candidates, officers and directors who need the information in order to do their job.
- Confidential information must not be shared outside Hama-Group without a confidentiality agreement approved by the Corporate Legal Group. Confidentiality obligations continue even after you leave Hama-Group.
- Any unauthorized disclosure of confidential information, whether unintentional or not, must be reported immediately to the Corporate Legal department at hamatechstaffing.com.
- This policy and the other provisions of this Code are not intended to prevent or dissuade staff and candidates from engaging in communications or activities protected by state or federal law, such as discussing wages, benefits or other terms and conditions of employment. This policy also does not prevent staff and candidates from disclosing confidential information when required by law or legal process.





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SECURITIES TRANSACTIONS

In the course of performing your job duties, you may occasionally obtain material information about Hama-Group that has not yet been made available to the public. When you are aware of material non-public information. This activity is called insider trading, and it is both illegal and against Company policy. The penalties for insider trading violations can include criminal fines and/or a jail term of up to 20 years for each violation. In addition, penalties can require repayment of unlawful profits and include a penalty of up to three times the ill gotten profits. These penalties are in addition to the Company's disciplinary actions, which can include termination of employment.

YOUR RESPONSIBILITIES

- Until Hama-Group has made important information about the Company public, staff and candidates must keep it confidential and are forbidden from using it for personal gain.
- It is illegal to share material non-public information with anyone to help them gain some advantage, either by buying or selling Hama-Group securities. This includes sharing or giving "tips" to spouses, brokers, friends or family members.
- You may not trade in the securities of another company (including Hama-Group clients, suppliers, service providers or business partners) if you obtained material non-public information about them in the course of performing your duties at Hama-Group.
- Never disclose any non-public information without a legitimate business purpose and proper prior authorization.
- Certain employees who regularly have access to non-public information have additional obligations, including not trading during quarterly trading "blackouts" and/or an obligation to clear trades with the Corporate Legal Group. These obligations — and more information about trading in general — are provided in the Hama-Group Insider Trading and Securities Compliance Policy.

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TRADE PRACTICES

Antitrust and competition laws protect free enterprise. Hama-Group is committed to free and fair competition and complying with all applicable antitrust laws.

YOUR RESPONSIBILITIES

- It is your responsibility to be aware of the anti-trust laws and their implications, including how they apply in the states in which you do business. While these laws are often complex and difficult to summarize, at a basic level they prohibit agreements between Hama-Group and our competitors that affect prices, terms or conditions of sale or fair competition.
- Use care in your relations with competitors. You might interact with competitors through industry meetings, conferences and other events. When you do, be careful not to make inappropriate agreements. Never engage in practices such as price fixing, customer or market allocation or bid rigging.
- Trade association meetings and other industry gatherings can pose certain risks, as they bring together competitors who might discuss matters of mutual concern and potentially cross the line of non-compliance with competition laws. Even joking about inappropriate topics, such as marketing or pricing strategies, could be misinterpreted and misreported. If any kind of anti-competitive discussion arises, you should refuse to discuss the matter and leave the conversation immediately.
- No staff or candidates may share any sensitive Hama-Group business information (prices, costs, margins, research and development efforts, strategic plans, etc.) with any third party, including actual or potential competitors.
- Staff and candidates will consult with the General Counsel before making any joint bids with competitors.
- If any inappropriate or illegal competition or antitrust conduct is detected or suspected of any staff, candidates or anyone doing business with the Company, such activities should be reported in accordance with Section 16 of this Code (see below).

No staff or candidates may share any sensitive Hama-Group business information with any third party, including actual or potential competitors.

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INTERNATIONAL TRADE LAWS

We abide by the trade laws of all states in which we operate, including economic sanctions and import & export laws. Most countries in which Hama-Group operates impose restrictions on the movement of products across borders.

YOUR RESPONSIBILITIES

- Trade sanctions, including financial sanctions, are complex. If you are involved in international transactions, such as business dealings with a sanctioned country, entity or person, you must ensure compliance with applicable trade laws.
- Products intended for import or export, including equipment, software and technology, must be classified in advance and all required labeling, documentation, licenses and approvals must be completed.
- Any questions about export regulations should be addressed to your local export compliance manager. Hama-Group Corporate Export Compliance email: hafsat.nasir@hamatechstaffing.com.



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EMPLOYMENT PRACTICES

At Hama-Group, our staff and candidates are individuals with different abilities, backgrounds and experiences. We believe that every staff and candidates should have the opportunity to fully contribute. The Company forbids employment discrimination or harassment based on race, color, sex (including pregnancy, childbirth and related medical conditions), national origin, religion, age, disability, genetic information, veteran status, sexual orientation, marital status or any other characteristic protected by applicable law

YOUR RESPONSIBILITIES

- Hama-Group staff and candidates must treat each other with respect and dignity.
- Value the contributions of others as Hama-Group does and listen to their viewpoints.
- Maintain fairness in all relationships.
- Never discriminate against anyone — including fellow staff, candidates, clients, suppliers, service providers, partners or any other person.
- All staff and candidates who believe that discrimination or harassment has occurred should report the incident, even if they are not the target of such discrimination or harassment.
- Hama-Group prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation relating to alleged discrimination or harassment pursuant to the applicable procedures.

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INTERACTIONS WITH OUTSIDE PEOPLE AND ORGANIZATIONS

- All investor or media inquiries regarding Hama-Group should be referred to or discussed with the Chairman and any of the assigned director.
- Only the Chairman and any of the assigned directors are authorized to address the media and our investors.
- Each of the assigned directors may grant certain Hama-Group staff and candidates permission to address the media and/or our investors under certain limited circumstances.

EMPLOYMENT PRACTICES

Hama-Group is committed to providing stockholders, governmental agencies and creditors with timely and accurate information about our results of operations. All public disclosures, including forecasts, press releases, speeches and other communications, will be honest, accurate, timely representations of the facts. If any reports are not accurate and truthful, our reputation could be damaged and we could face fines and penalties.

YOUR RESPONSIBILITIES

- Make sure that any business information you report is accurate, complete and timely. Be certain that any document you prepare or sign is correct, complete and truthful. Providing false or misleading records or altering records is always wrong and can be a serious violation of the law.
- To ensure compliance with all applicable securities laws and regulations, each staff and candidates involved in Hama-Group disclosure process, including the Chief Executive Officer and the Chief Financial Officer, is required to be familiar with and comply with Hama-Group disclosure controls and procedures and internal control over financial reporting.
- Each staff and candidates that has direct or supervisory authority regarding securities filings or Hama-Group other public communications concerning its general business, results, financial condition and prospects should consult with other Company staff and candidates with the goal of making full, fair, accurate, timely and understandable disclosure.
- Each staff and candidates who is involved in the Company's disclosure process must:
 - a) familiarize himself or herself with the disclosure requirements applicable to Hama-Group as well as our business and financial operations;
 - b) not misrepresent or cause others to misrepresent, facts about Hama-Group to others, including to Hama-Group independent auditors, governmental regulators and self regulatory organizations; and
 - c) properly review and critically analyze proposed disclosure for accuracy and completeness (or where appropriate, delegate this task to others).
- Promptly report suspicious transactions or activities and refer questions relating to these topics to the Internal Audit Department or the Hama Ethics Hotline (see Section 16).





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PRIVACY

Hama-Group respects the confidentiality of the personal information of its staff, candidates, clients, suppliers and service providers. Colleagues and many others entrust Hama-Group with personal information and it is our responsibility to keep this information confidential.

YOUR RESPONSIBILITIES

- Do not provide confidential or proprietary information to third parties, including business partners and vendors, without appropriate authorization and a valid confidentiality agreement. If in doubt, check with your agent or the Corporate Legal Department.
- Be careful when using electronic means of storing and sending information.
- Do not discuss confidential information in places where you might be overheard.
- Secure all confidential information when working in an open environment.
- Properly dispose of confidential or proprietary information.
- Beware of informal telephone or email requests from outsiders seeking personal or confidential information (commonly known as “phishing”).
- All computers, electronic equipment, electronic data and records, Company issued phones, physical files, lockers, desks and other furniture are the property of the Company. Employees are not entitled to and should have no expectation of, any right of privacy as to any materials, communications, information or files maintained, transmitted or stored using the Company’s property and systems regardless of the nature of any such communication, material, information or file.

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INTERLECTUAL PROPERTY

Intellectual property that is designed, created, developed or modified while performing work related duties is Company property.

YOUR RESPONSIBILITIES

- Staff and candidates may not copy software provided to Hama-Group by vendors unless the Company is licensed to make copies and the staff or candidates has received written permission from the Corporate Legal Department, or Hama-Group corporate senior management.

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ENVIRONMENTAL RESPONSIBILITY

Staff and candidates should conduct Hama-Group business in compliance with all applicable environmental laws and regulations. If you believe that an environmental hazard exists, that there has been a release of any hazardous substance or that environmental guidelines are not being followed, you must immediately report the situation to your agent.

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REPORTING AND ACCOUNTABILITY

Making proper decisions can be difficult in our complex business environment. You may occasionally need to seek advice or assistance in order to resolve an issue. You are encouraged to seek information or guidance about our ethics and compliance standards. Hama-Group is a non-retaliatory environment, making it safe for staff and candidates to raise ethics and compliance concerns in good faith. Our non-retaliation policy is actively supported by our board of directors and board of trustees management.

YOUR RESPONSIBILITIES

- Seek help if you are ever unsure on a course of action.
- NO ONE, even senior managements, has the authority to tell you to do something illegal or unethical.
- Raise concerns about any violations of our Code that you see or suspect.
- Never retaliate against anyone who makes a good faith report of suspected misconduct.
- Cooperate fully and honestly in any internal investigation of alleged misconduct.

ETHICS AND COMPLIANCE HOTLINE

To promote ethical behavior and a culture of compliance, Hama-Group offers Compliance Hotline phone and web-reporting tools. These tools provide all Hama-Group staff and candidates a way to report concerns or get information or advice (where available and permitted by law). Both the telephone hotline and the web-reporting tool are operated by specially trained third-party representatives and are available 24 hours a day, 7 days a week, 365 days a year. All information reported through the telephone hotline and the web-reporting tool is forwarded to Hama-Group personnel responsible for administration of the Code. You can request to receive information about the Company's response to your concerns.

You are encouraged to identify yourself when using the Compliance Hotline as this information often helps promote a thorough response or investigation. However, certain jurisdictions, allow anonymous Compliance Hotline reports.

Hama-Group Telephone Hotline:

[Tel:+234 707 4139 999](tel:+2347074139999)

Hama-Group Web-reporting Tool:

hamatechstaffing.com/ethicspoint

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WAIVERS

All staff, candidates, officers and directors are required to follow this Code. Waivers of this Code for staff, candidates and officers of the Hama-Group family of companies must be approved by the General Counsel. Waivers of this Code for board management must be approved by the Board or a Committee of the Board and promptly disclosed to Hama -Group stockholders, if required.

