



GEO-CHEM GROUP

IFIA Compliance Program Rev.0 dated 14/01/2009.



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Geochem Group IFIA Compliance Program

Program Objective

The overall objective of this Geo-Chem Group IFIA Compliance program is to ensure perfect implementation of IFIA compliance code in accordance with the IFIA guidelines.

Analysis of Violations

If any violation of IFIA compliance code is reported to any operation managers, the same will be communicated to the compliance officer. The compliance officer or regional delegate or his nominee investigates the reported violation of the compliance code. All reported violations shall be recorded and maintained in accordance with quality system procedure for corrective action handling of the specific region. The alleged perpetrator will be given opportunity to be heard regarding the violation. If needed the investigating officer will discuss and take proof from all possible sources including client staff, agent, etc. regarding the incident. The investigating officer will prepare a report detailing the incident and the report will be handed over to the top management to take proper actions if any violation is established.

The actions include warning, demotion, suspension or dismissal depending on the investigating officer's report and in accordance with the respective sections of labor law of the country of occurrence of the incident will be carried out by the management.

Any such violation and investigation reports, and action taken will be discussed in the next compliance committee and the same will be communicated through out geochem group for awareness of the violation and prevention of such incidents in future.

Internal Audit

Internal audits are conducted according the quality procedure for internal audit of the quality system along with the audit the auditor who is auditing the operation department will check the implementation of IFIA compliance code with the help of IFIA check list.

External Audit

External audit is conducted by nominated financial auditing firm for the previous financial year and the report is forwarded to IFIA within six months of close of books of accounts in normal case. Any suggestion regarding implementation of IFIA compliance code by the external auditing firm will be taken with due importance and the same will be implemented at the earliest. Any such findings will be discussed in detail in the next compliance committee and action plan for implementation of the suggestion will be derived.

General

All actions and working of the IFIA compliance committee and related matters make use of the ISO 9001 quality system documents for any related records and guidance regarding any quality formats and records.

Conclusion

Each and every processes detailed in the compliance code is implemented and compliance code is given to all staff members within the operation department. All quality assurance is being carried out with respect to ISO quality manual and procedures along with Geochem group IFIA compliance code and this compliance program.

A handwritten signature in blue ink, consisting of a stylized 'G' and 'K' followed by a period, enclosed in a circle. Below the signature is a horizontal line.

**Signed on behalf of Geochem Group by
Compliance Officer dated 14/01/2009.**