



Compliance Policies

Public edition · 30 October 2026
Enermax for Trading and General Contracting LLC

These are the policies Enermax works to on every contract. This public edition summarises the controlled documents listed under each heading. Signed, controlled copies, and the documents listed at the end, are given to clients and prime contractors on request.

Quality, Health, Safety and Environment (QHSE) Policy

ENX-QHSE-POL-001 · Rev. 0, October 2026

Enermax for Trading and General Contracting LLC is committed to delivering services and products that meet our clients' requirements, while protecting the health, safety and security of our employees, subcontractors, clients and the communities where we work, and minimising our impact on the environment. QHSE is a core value and a line-management responsibility, shared by every employee and subcontractor.

- Safety first. We aim for zero harm. Every employee and subcontractor has the authority and the duty to stop any unsafe work.
- Compliance. We comply with all applicable laws and regulations, client and contract requirements, and international standards.
- Quality. We maintain a quality management system based on ISO 9001:2015 and deliver our work right first time and on schedule.
- Prevention. We identify hazards, assess risks and put controls in place before work starts, through job safety analysis and permits to work.
- Environment. We prevent pollution, manage waste responsibly and use resources efficiently.
- Competent people. We give our people the training, personal protective equipment and supervision they need, and confirm they are fit for work.
- Supply chain. We hold our suppliers and subcontractors to the same QHSE standards we set for ourselves.
- Report and learn. We report every incident and near miss without blame, investigate the causes and act to prevent recurrence.
- Emergency readiness. We plan, train and drill for emergencies, crises and business disruption.
- Continual improvement. We set measurable QHSE objectives, monitor our performance and review this policy every year.

Anti-Trafficking in Persons Compliance Plan (FAR 52.222-50)

ENX-ESG-015 · Rev. 0, 13 October 2026

Enermax prohibits trafficking in persons and all related activities by its employees, agents and subcontractors, as defined in FAR 52.222-50 Combating Trafficking in Persons. This plan applies to all U.S. Government-funded work and to all our operations, and is posted at our workplaces and on this website.

- Prohibited: trafficking in persons, forced labour and commercial sex acts; destroying, concealing, confiscating or denying access to identity or immigration documents; misleading or fraudulent recruitment; charging recruitment fees to workers; failing to provide return transportation when required; housing below host-country standards; and failing to give a written contract in a language the worker understands.
- Awareness: training at induction and every year for all staff, with posters in Arabic and English at sites and accommodation.

- Reporting: concerns can be raised with any manager, by email to ethics@enermaxllc.com, through the client's hotline, or with the Global Human Trafficking Hotline 1-844-888-3733 (help@befree.org), without retaliation.
- Recruitment and wages: only approved agencies that charge no fees to workers; wages at or above host-country legal requirements; written contracts.
- Housing: accommodation meets host-country housing and safety standards and is inspected monthly.
- Agents and subcontractors: due diligence before engagement, contract clauses, audits, and termination for violations.
- Monitoring: quarterly checks that workers hold their own passports, payroll audits, confidential worker interviews and accommodation inspections. Credible information of a violation is reported to the Contracting Officer and the agency Inspector General immediately.
- Certification: before award and every year, the Managing Director certifies that the plan is in place and that, after due diligence, no violations have been found or appropriate remedial action has been taken.

Code of Conduct

ENX-ESG-001 · Rev. 1, 21 October 2026

One Code applies to everyone who works for or on behalf of Enermax: directors, staff, temporary workers, subcontractors, agents, labour suppliers and vehicle owners, in Iraq and abroad. Where a client contract sets a stricter rule, the stricter rule applies.

- Safety first: no job is so urgent it cannot be done safely, and everyone has Stop-Work Authority.
- Honesty: timesheets, trip logs, weighbridge tickets, invoices, inspection records and reports are complete and true. We never sign for work not done.
- Integrity: no bribes, kickbacks, facilitation payments or improper gifts, to anyone, for any reason. No gifts or hospitality to or from client or government personnel on U.S. Government work.
- Respect: everyone is treated with dignity regardless of nationality, religion, sect, ethnicity, gender, disability or job. No harassment, bullying or abuse.
- Fair work: we pay on time, keep reasonable hours, never hold passports and never charge recruitment fees.
- Security and confidentiality: we protect client information, site layouts, access lists and personal data. No photos on client sites without written permission.
- Environment: waste goes only to licensed sites; we prevent spills and use water and fuel carefully.
- Compliance: we follow Iraqi law, client rules, U.S. Government flow-down clauses, sanctions and export controls.
- Speaking up: concerns can be raised with any manager, by email to ethics@enermaxllc.com or by phone on +964 787 666 7777, anonymously if preferred. Retaliation is itself a disciplinary offence.

Human Rights and Labour Practices Policy

ENX-ESG-003 / ENX-ESG-004 · Rev. 0, October 2026

Enermax respects internationally recognised human rights, as set out in the Universal Declaration of Human Rights and the ILO core conventions, and follows the UN Guiding Principles on Business and Human Rights. These minimum employment standards apply to everyone who works for us, including workers supplied by labour agencies and subcontractors.

- No forced labour, no recruitment fees, no passport retention and no workers under 18.
- Written contracts, minimum wage or better, on-time pay, fair working hours and rest days.
- No discrimination in hiring, pay, promotion or discipline.
- Labour suppliers are audited before use and every year.

- Annual human rights due diligence: assess, act, track, communicate and remedy.
- A confidential grievance channel, with answers within 10 working days.

Supplier Code of Conduct and Responsible Sourcing

ENX-ESG-013 · Rev. 0, October 2026

Our clients hold us responsible for our supply chain. Every supplier working for Enermax must meet the same ethics, labour, safety, environmental and security standards as Enermax, and pass them on to its own suppliers.

- Suppliers are screened before engagement, and high-risk suppliers are audited every year.
- We prefer local suppliers and lower-impact products where quality and price allow.
- Serious breaches lead to termination and removal from our approved supplier list.

Substance Abuse Policy

ENX-HSE-SAP-001 · Rev. 0, 13 October 2026

Enermax is a drug- and alcohol-free workplace. No employee or lower-tier worker may work for Enermax while under the influence of alcohol or a controlled substance.

- No alcohol, drugs, weapons or explosives at work.
- Pre-assignment, random, reasonable-suspicion and post-incident testing.
- Refusing a test counts as a positive result and leads to removal from site.
- Test records are confidential and kept separate from the personnel file.

Environmental Policy

ENX-ESG-007 · Rev. 0, October 2026

Enermax provides waste collection and disposal, sewage and sludge removal, cleaning and general contracting services, so our business is, in large part, protecting the environment for our clients. Our environmental programme follows a Plan-Do-Check-Act cycle aligned with ISO 14001 (not certified).

- Comply with environmental law, permits and client requirements; permits come first.
- Prevent pollution: no illegal dumping, no leaks and no uncontrolled discharge.
- Every load is traceable to an approved disposal site and receipt.
- Reduce waste, water use, fuel use and emissions, and set and measure objectives.
- Targets: zero illegal dumping, zero uncontrolled discharge and 100% spill-kit coverage.

Controlled documents available on request

- HSE Programme Manual (ENX-HSE-001, Rev. 2)
- Business Ethics and Anti-Bribery Policy (ENX-ESG-002)
- Fire Prevention and Emergency Response Plan
- Lockout/Tagout Programme
- Spill and Pollution Prevention Plan
- Job Hazard and Risk Assessments
- Injury Management, First Aid and Medical Emergency Programme
- Working at Height, Electrical Safety and Hand and Power Tools procedures
- Safe Work Training Pack and Site Forms

