



DIWALI LIMITED

Quality Is Our Standard

CORPORATE SUMMARY

**Construction And Building Experts. Borehole Drilling,
Solar Light Installations, Building Materials, and
Engineering Designs- Delivering Quality.
Quality Is Our Standard**



Procure, Supply & Experts in:
Building & Construction
Solar Light Installation
Borehole Drilling
Architectural Designs
Equipment Leasing
Quantity Surveying
Manpower Supply
Civil, General Goods & Equipment, etc.

20 Chief Tom Agbuji Road, G.R.A. Phase 3,
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DIWALI LIMITED



WELCOME TO OUR BUSINESS

DIWALI LIMITED is an indigenous Nigerian company which was established as a practical demonstration of the long – held belief by its founders that Nigerian entrepreneurs could rise to the challenge of creating an indigenous company that would employ the best available technologies to give its clients in the dredging and construction industries, international standards of service and maximum satisfaction.

From inception we have worked assiduously to meet this goal through the supervision of several projects in conjunction of the rightful clients. Diwali Limited has been, and remains, committed to the basic philosophy of efficient service delivery – timely on every aspect of its operations since it comes into full blown operation in 2018. We have combined extensive local knowledge with selective Nigerian and link up to Foreign Technical Partnerships when the need arise to create a unique competence that few of our competitors, whether local or foreign, can match. The Company employs a general management approach that places great premium on innovation and creativity; it is thus, able to respond in a dynamic and proactive manner to clients' changing needs.



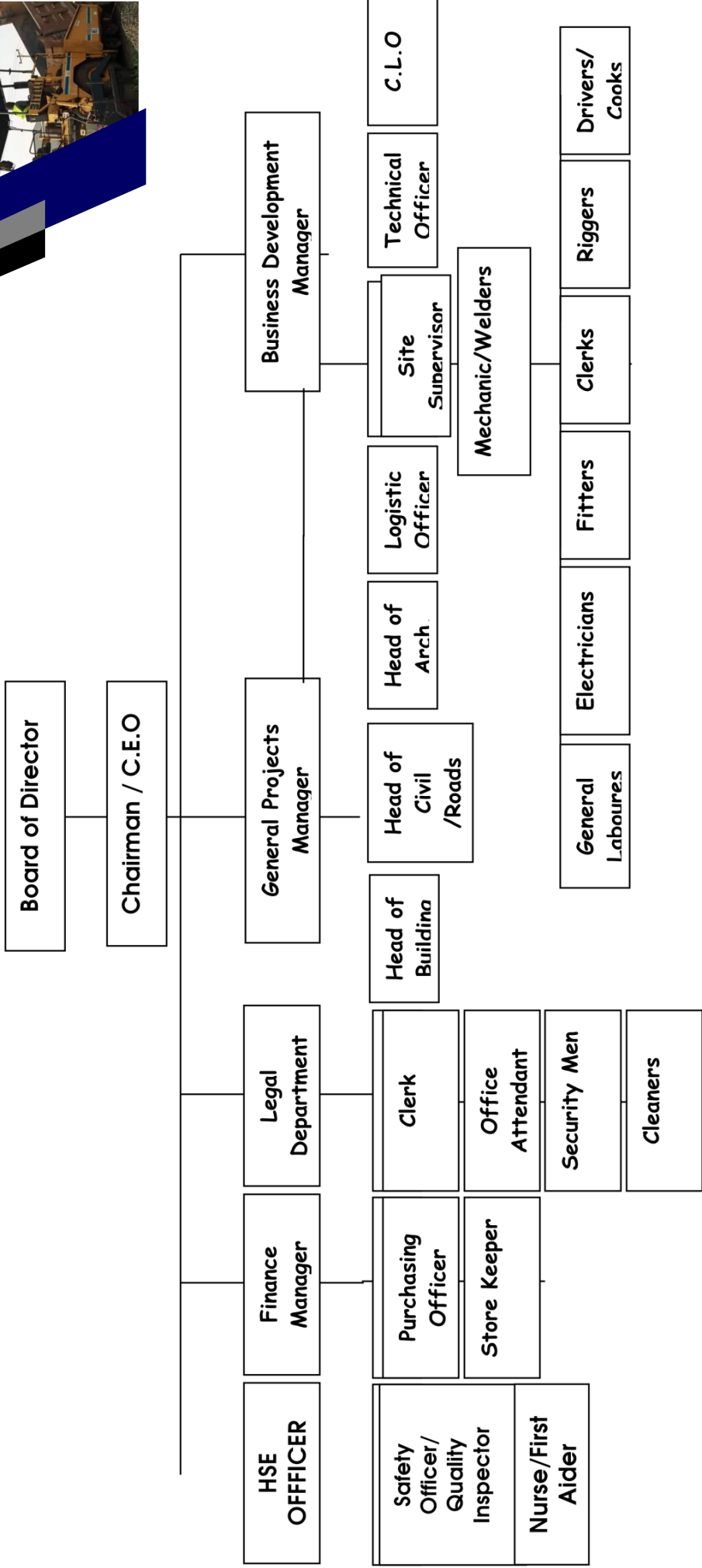
OUR VISION

To be a leader in our area of specialty through the identification and remediation of all contaminated sites we are privileged to address.

OUR MISSION

To expand our efforts in our chosen fields through relentless pursuit to meet the needs and organizational objectives of our clients, by building partnership based on trust while maintaining respect for our environment.

ORGANOGRAM





ECONOMIC MISSION

To operate Diwali Limited in a sustainable financial manner which will ensure profitable growth, increasing value of the company and expanding opportunities for the professional development and growth of our employees. Our profit is the responsibility of all.

SOCIAL MISSION

To operate Diwali Limited in a manner that actively recognizes the important role that business plays in every society, as well as the immediate environment it operates, by establishing innovative ways to improve the quality of life of our host community and employees. We shall live up to our societal responsibility by ensuring we are economic, intellectual and social asset to each community and states we operate in. we motivate and trust our employees to do the right thing and to make a difference.



OUR VALUE

All employees of Diwali Limited share a strong safety –first approach to providing innovative solutions, technical expertise and 100% committed to service and professionalism.

Our guiding motivation is to be client-driven at every stage in our field. Our employees believe in teamwork, integrity, and accountability with recognition through results. We believe our growth is a result of our company's positive values and strong work ethic, which has always produced the best working relationship with our clients and host communities.

EXPERIENCE

Years of experience in the Niger Delta Region of Nigeria in the construction industry have allowed our company to thoroughly understand the challenges inherent in all projects site. From the standard to the complex, our team exhibits foresight and ingenuity to meet those challenges with success.

APPROACH

The safety and protection of our clients, employees and the community are of the utmost importance to our company. Rigorous safety standards are built into every project we undertake. Our teams are equipped with the necessary safety gear and are highly trained and skilled in safety protocol. All equipment meets or exceeds industry safety standards.

SOLUTIONS

Our services, experience and approach create the foundation from which successful project emerge. Together, through team work with our clients, we ensure a timely completion of your project; developing plan that makes the most efficient use of the current technology and budgeted time.



COMMUNITY AWARENESS PROGRAMS

We at Dabskic places high regards on assisting the disadvantaged Children and Young Adults to reach their full potential as members of their Communities as well as raising Community Awareness towards those in need.

Dabskic regularly supports our host Communities it works within, by contributing direct funding, along with providing access to global-standards, high-quality education and necessary health resources and medical care. We build a brighter future to those who would otherwise have little hope of excelling as productive members of their Societies.

Dabskic vision for the future to assist the handicapped and less privilege citizens in having an equal opportunity to become self-sustaining, responsible members within their own Communities, as well as valuable members of the Society, can never be emphasized.

MAJOR AREAS OF OPERATIONS



Civil Construction

Diwali Limited offers a complete range of civil engineering and related services to its clients.

Road Construction & Maintenance Services

At Diwali Limited, we build more than just roads — we create reliable pathways that connect people, communities, and businesses. With a strong commitment to quality, durability, and safety, we specialize in the construction of well-engineered roads designed to withstand the test of time and harsh environmental conditions.

Our services cover every stage of the process, from site evaluation and design to grading, paving, and final finishing. Whether it's urban roads, rural access routes, or highway infrastructure, Diwali Limited delivers excellence through skilled manpower, modern equipment, and strict adherence to industry standards.

When you choose Diwali Limited, you're choosing precision, reliability, and roads that lead to progress.

Jetty/Wharf Construction

The Company's capability in this area has been amply demonstrated by special terrain projects undertaken in the Niger Delta region of Nigeria. Special studies and designs to overcome natural constraints have also been undertaken collaboratively with our local partners for both private and public sector clients.

Shoreline Protection/Reclamation

Land reclamation, the protection of coasts and shores, are our most visible activities. Our projects contribute to the economic development of the Niger Delta.

We are an indigenous company that can work in any part of the Niger Delta Region. We also welcome and promote healthy relationships with foreign partner in terms of technology, labour workforce and financial ability to ensure the very best end product for our Clients.

MAJOR AREAS OF OPERATIONS

Dredging

Diwali Limited carries out the activity in dredging and solving coastal erosion problems through the design and implementation of shore line protection techniques. Our capabilities and approach allow us to execute projects on time and on budget in the logistically challenging terrain of the Niger Delta with a perfect understanding of the environmental and communal sensitivities associated with these demanding areas.

Building Construction

Private houses, school blocks, hospitals, multi-storey public buildings, etc., are some of the building projects that Diwali Limited can undertake for clients.

Marine Services

We lease out barges, tug boats, speed boats, house boats, sea going vessels, and swamp buggy to our clients at affordable prices.

Consultancy Services

We render various consultancy services in the Engineering, Drilling, Environmental, Project Management and Dredging sectors with a team of qualified personnels.

Other major area of Diwali Limited scope of services includes a range of activities in design and construction of Ramps, Embankment, Dams, Dolphins, Slip-ways, Wharves, Oil Platform, Helipad, Drills Locations, Location Preparation and Erosion Control, Piling Jobs, Foundations Specialists, Canalization, Diving and Maintenance Services, Pipeline maintenance and suppliers of steel sheet piles, casings [abroad and locally] amongst other.

EQUIPMENT RESOURCES/ASSETS OWNED



By the very nature of our services, Diwali Limited we have invested heavily in a wide range of expensive equipment most of which is on station at various locations for immediate mobilization.

In addition to such on-station items of equipment, Diwali Limited has put in place Joint Venture arrangements with foreign and local companies to ensure that whenever the need arises for the acquisition or lease of new equipment, it can have accessed within a short notice.

EQUIPMENT	EQUIPMENT MODEL	QUANTITY
SWAMP BUGGY	CAT 225	1
TRACK CRANES	22RB, 35TON,/45TON	3
VIBRO HAMMERS	3, 5 AND 10 TONS	2
BARGES	500, 800, 1000 TONS	3
CONCRETE MIXER	LIEBHERR 906	3
DOUBLE CREW TUG BOATS		2
DREDGERS	2 16'BY16', 14'BY14', 12'BY12',	3
GRAB BUCKETS ON CRANE		1
GENERATORS	LINCOLN 400 AMPS	2
PILING DELMAG HAMMERS	D12, D15, D22	3
WELDING MACHINES	LINCOLN/DENYO	4



DIWALI LIMITED



**QA/QC
MANUAL**

[QMS] QUALITY MANAGEMENT SYSTEM



Diwali Limited operates an active, on-going quality management system. These are as a result of the marketability of Diwali Limited products and performances. Maintaining and expanding this marketability is directly dependent on quality and reliability of our products. These basic and vital considerations are also laid down in Diwali Limited.

Quality Policy

Diwali Limited has developed its quality management system over the year which system has proven highly successful for the Company as a working business tool to deliver consistently highly quality services.

Diwali Limited Quality Management System:

- * Covers every aspect of the services to be provided.
- * Has been tried, tested and refined in the Company's operations.
- * Is focused on customer on customer and client requirements.
- * Pro-actively manages standards through a process of continuous self-assessment.
- * Provides benchmarks for objective client and management monitoring.
- * Encompasses the commitment of each member of Diwali Limited Staff
- * Is supported by established, complementary training programmes.
- * Are unit specific, being flexible enough to meet individual needs yet systematically delivering consistently high standards?
- * Incorporates ISO 9002 quality systems to ensure that effective controls are consistently and adequately applied to Diwali Limited work processes and to provide a record of Diwali Limited quality-related activities.

1.0 STATEMENT OF POLICY

The Contractor is dedicated to providing the organization and commitment that will establish and execute a QA/QC Manual as described in this program. All construction activities shall be performed according to the QA/QC Program, Contract specifications and applicable code.

If a conflict occurs between the requirements of this QA/QC Programme and the Contract Documents, the latter shall take precedence. The Contractor Senior Management fully supports the establishment and implementation of the QA/QC Program, with the understanding that “Quality of Work” is the primary responsibility of all Contractor employees, and that QA/QC starts with each individual.

The QA/QC Department will administer this program and shall be independent of on-site management personnel with the authority to identify Nonconforming items, recommend dispositions and corrective action, and verify implementation of those recommendations.

When a Nonconforming condition can not be resolved between Project Management and QA/QC Department personnel, the problem will be elevated to the attention of the Contractor Senior Management for resolution. The QA/QC Program may only be revised or modified by authorization of the QA/QC Engineer.

2.0 ORGANIZATION AND FUNCTION

This project shall establish a QA/QC Program as described in this plan, and the QA/QC personnel will be responsible for the implementation of the program. The QA/QC personnel shall be independent from Project Management while maintaining a direct line of communications and reporting authority with the Project Manager and Superintendent for any activities that do not directly affect the implementation of the QA/QC Program. The QA/QC personnel shall report directly to the QA/QC Manager involving any activities that affect the Quality of the Project.

Requirements of the QA/QC Program and Inspection Control are defined in this document. The QA/QC Program of this Plan deals with the general requirements necessary to implement the Quality.

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The Inspection Control provides the minimum Inspection Requirements for each construction activity. The QA/QC Department as detailed in the applicable Inspection Controls shall perform Inspections to Quality Standards. If there is a conflict between the requirements of the Inspection Controls and the Contractor Documents, the latter shall take precedence.

All Subcontractors' shall be required to submit their own QA/QC Program covering the services provided by their company. The QA/QC Engineer shall approve the Subcontractor's QA/QC Program prior to the start of construction activities. As a minimum all subcontracted services shall be performed to the requirements of the Contractor QA/QC Program.

The QA/QC personnel shall be responsible for performing periodic audits of all Subcontractor activities. Audits shall ensure compliance with the Subcontractor's QA/QC Program, the Contractor's QA/QC Program and all Contract Documents. It is not the intent of this program to imply that all the Staff positions and Inspection requirements described herein are applicable for every Construction Project. Depending on the project size, two or more of the Staff positions may be performed by one individual. The QA/QC personnel is responsible for determining the Project's Inspection Requirements.

2.1 RESPONSIBILITIES

2.1.1 Operations Manager

The Operations Manager is an integral part of the Quality process by ensuring that "Quality petroleum products" is a fundamental requirement of the Project, and the Quality Control Staff have the full support and co-operation of all Construction Personnel.

2.1.3 Project Manager

The Project Manager under the directive of the Project Manager shall maintain a close link with the QA/QC Department for all the quality requirements on the Project from the Contract Review state to the final "As-built" stage.

2.1.3 Construction Manager

The Construction Manager reports to the Project Manager and is responsible for directing the Superintendents while ensuring Construction activities are completed according to all the Contract Requirements.

2.1.4 Construction Superintendent

The Construction Superintendent reports to the Construction Manager. He directs the entire Workforce on the Construction Site for maximum Productivity.

2.1.5 QA/QC Personnel

The QA/QC Personnel is responsible for the implementation of the QA/QC Program and supervision of the Quality Control Staff.

2.1.6 Quality Control Staff

The Quality Control Staff shall be responsible for the Inspection of Workmanship, and materials as defined in this Manual. Inspections performed by the Quality Control Staff shall be documented as detailed in the applicable Inspection Controls.

3.0 RESPONSIBILITIES

3.2.1 Project Manager

- 3.2.1.1 The designated Project Manager shall receive all Documents when issued by the Company's Representative.
- 3.2.1.2 He shall verify that the products are in good order, comparing them with any accompanying Transmittal letter.
- 3.2.1.3 The Project Manager shall then forward the documents to the QA/QC personnel.
- 3.2.1.4 Material requisitions and MTOs (Material Take-Offs) generated by the Engineering Services Department shall be forwarded first to the Project Manager for his review and signature before being sent to the Purchasing Department. The QA/QC Department shall not receive copies of Material Requisitions or MTOs.

3.2.2 QA/QC Department

3.2.2.1 The QA/QC Department shall have the authority to implement and administer this Control.

3.2.2.2 Receipt of Documents

3.2.2.3 The QA/QC Department shall, after comparison with the Transmittal letter, log in all drawing and other documents on the appropriate Documents Control Log.

3.2.2.4 The QA/QC Department shall generate and maintain a **Drawing Control Log**, and **Isometric Control Log**, and other such Document Control Logs as may become useful. These Document Control Logs shall contain pertinent information, such as: document number, revision, date issued, date received, number of copies received, when/to whom issued for review, number of copies issued, date issued to production departments, number of copies issued; and a description of the Document.

3.2.2.5 The receipt of subsequently generated documents, such as those provided by a sub-vendor, engineering sub-contractor, or **DIWALI LIMITED** shall also be logged in as received by the QA/QC Department.

3.2.2.6 The QA/QC personnels shall receive Construction Drawings and other Documents provided by a Sub-Vendor or Engineering Contractor. The QA/QC Department shall then forward copies to the Project Manager as requested.

3.2.2.7 Delivery Departments generated by Oil Services Department (Cut Lists, Cut Sheets, Isometric Piping Drawings, Templates, etc) shall be stamped and initialed when checked by the Oil Services Department Copies shall then be issued to the QA/QC personnel as requested.

3.3 ISSUANCE OF DOCUMENTS

3.3.1 The QA/QC Department shall issue drawings and other documents to internal and external parties as necessary, accompanied by a **Document Transmittal**

which shall be signed by the receiving party.

- 3.3.2.1 The Document Transmittal shall contain all pertinent information on the issuance of drawings and other documents, as recorded in the affected Document Control Log. The QA/QC Department shall keep on file a copy of each Document Transmittals.

3.4 REQUEST FOR INFORMATION

- 3.4.1 Whenever clarification to a document becomes necessary, the pertinent party shall prepare a **Request for Information (RFI)**, and forward it to the Project Manager. The Project Manager shall research the question and determine whether the answer requires a change.
- 3.4.2 Should a Change be issued, the Project Manager shall initiate the receipt procedure as though there had been new information received.

3.5 REVISIONS TO DOCUMENTS

- 3.5.1 Upon a Change be issued, the Project Manager shall initiate the receipt procedure as though there had been new information received.
- 3.5.2 The QA/QC Department shall complete a new Document Transmittal, which shall accompany the revised documents when these are issued.
- 3.5.3 In the case of a change made to a drawing or other document (no revised document issued), the Project Manager shall annotate all current copies of the affected drawing or other document with the change, along with the date and his initials. He shall then proceed to obtain a proper revision to the affected document.

3.6 RETRIEVAL OF SUPERSEDED DOCUMENTS

- 3.6.1 The QA/QC Department shall retrieve and destroy all superseded drawings and other documents upon issuance of revisions, except for one copy, which shall be retained by the Engineering Services Department or the QA/QC Department. The QA/QC Department shall clearly mark “VOID” in red on this retained copy.

- 3.6.2 If a supersede drawing or other document is retained by any Production Department for record-keeping purposes, the QA/QC Department shall clearly mark "VOID" in red on the document along with the date and the initials of the person voiding the drawing.

3.7 RETRIEVAL OF DOCUMENTS UPON THE COMPLETION OF A PROJECT

- 3.7.1 The QA/QC Department shall retrieve all copies of drawings and other documents upon the completion of a project and turn them over to the Project Manager for archival disposition.

4.0 DESIGN AND DRAWING REVIEW

This section covers the Quality Policies and responsibilities of Design and Drawing Verification and Changes. It further details steps in place to ensure that the most recent revisions of documents and /or drawings are circulated within the systems.

4.1 PROJECT MANAGER'S RESPONSIBILITY

All documents and drawings from the Company shall be issued directly to the Project Manager. It is then the Project Manager's duty to:

- 4.1.1 Establish organizational and technical links between the Companies Fabrication Group, QA/QC Department any Sub-Contractors.
- 4.1.2 Identity and Control any deviations.
- 4.1.3 Monitor and update any changes to design documents.
- 4.1.4 Correspond with the Company on all matters with the Company.
- 4.1.5 Technical Memos shall be used to correspond with the Company when any discrepancy is noted on the Company Supplied documents. The Technical Memos shall state the nature of the discrepancy, location of discrepancy and recommendations for correcting the discrepancy. Written requests for changes shall be forwarded to the Company for approval prior to commencement of any change in the Work Scope.

4.2 PROJECT ENGINEER'S RESPONSIBILITY

it is the responsibility of the Project Engineer, who reports directly to the Project Manager to:

- 4.2.1 Verify Design; by conducting dimensional checks
- 4.2.2 Prepare a Bill of Materials.
- 4.2.3 Prepare Shop Drawings with spool numbers and weld identification marks.
The shop drawings must, as a minimum, carry the following information.
 - 4.2.3.1 Material Grade
 - 4.2.3.2 Material Specification
 - 4.2.3.3 Material size and quality
 - 4.2.3.4 Material length and thickness
 - 4.2.3.5 (P+ID) Reference
 - 4.2.3.6 NDE Requirements
 - 4.2.3.7 Test Pressure
- 4.2.4 Return prepared Shop Drawings to the Construction Manager
- 4.2.5 Issued drawings after approval from the Construction Manager to all personnel involved. Each drawing shall be accompanied by a drawing transmittal.
- 4.2.6 Ensure that only drawing marked Approved For Construction (AFC) are issued for fabrication.
- 4.2.7 Retrieve and destroy previous revisions of drawings
- 4.2.8 Liaise with the QA/QC Personnel to document any changes to the drawings / design.
- 4.2.9 **Preparation of final as-built drawings:** The Project Engineer also has the responsibility for ensuring that correct data is used for all computer calculations and shall verify same. The Project Manager shall review all calculations. Changes or Revisions shall be recorded on the affected document; such revisions will be highlighted by means of “Clouds” or other means for clear identification. The log shall contain, as a minimum, date of revision, revision, initiator’s initials and approving signature.

5.0 MATERIAL CONTROL

All permanent materials supplied by the Contractor shall be purchased in strict compliance with the Contract Documents and Specifications.

5.1 RESPONSIBILITIES

5.1.1 Project Manager

Project Manager shall Review the Material Take Off (MTO) and shall initiate action for the use of correct material.

He shall maintain a close link with the QA/QC Engineer in decision making as regards. None Conforming, Over, Short or Damage Materials.

5.1.2 Project Engineer

The Project Engineer shall prepare Material Take Off (MTO) list and monitor the application of the required materials. The Engineer is responsible for reviewing all Purchase Orders to ensure these contain the necessary information to allow the Material Control Personnel to Purchase Materials which meets the Contract Requirements.

5.1.3 Material Control Coordinator

The Material Control Coordinator has the full responsibility of Receiving, Handling, Storage and Distribution of Materials. The maintenance of the up to date Stock is the responsibility of the Material Control Personnel.

5.1.4 QA/QC DEPARTMENT

The QA/QC Department shall Inspect all of the Contractor Purchased Material. Inspection shall be performed to ensure compliance with the manufacture's information, applicable Codes, Standard, Specifications and Drawings.

Materials requiring a grade or type marking shall be identified in a manner that allows traceability until installation of any section, or pieces not used at one time.

If a deficiency is noted an, Over Short and Damage report shall be implemented and the information entered into the Material Inspection Log. The material will be isolated until a resolution is reached by the Project Manager, QA/QC Department and the Company Representative, at which time the OS&D Report and Material Inspection Log will be signed as completed.

Material shall be controlled and stored to prevent damage from handling, environmental conditions and over stacking.

Department is responsible for reviewing all Purchase Orders to ensure that these contain the information necessary to allow test instrumentation purchased to meet the Contract requirements.

All Test Instruments, whether supplied by the Contractor or the Company shall be issued in good working condition, calibrated as required in accordance with the Manufacturers recommendations and Company Specifications. If there is reason to question the Calibration, or accuracy of any Tools or Test Instruments, then these shall be re-calibrated before use.

The Construction Manager is responsible for ensuring only Calibrated Test Instruments are used for Construction activities.

The QA/QC Department shall verify each Test Instrument used to ensure that these are calibrated as required in accordance with the Company's Specifications. The QA/QC Department will maintain a complete record of all Calibrations.

8.0 NON-CONFORMANCE /CORRECTIVE ACTION

Non-conformance is any discrepancy discovered either in Material, Working Procedure, or Personnel which does not meet the Project Specifications.

8.1 RESPONSIBILITIES

Inspections will be performed by the QA/QC Department throughout the duration of the construction activities. These Inspections will be performed to ensure materials and workmanship meet Contract Documents, Specifications and applicable Codes.

The term "Corrective Action", may apply to item(s) which both do, and do not require a Non-conformance Report. Corrective Action is the identification of the cause, and action required to prevent recurrence of an unacceptable condition. This is an integral part of the Non-conformance Report and can also be used in the deficiency section of the Inspection Report to help prevent recurrence of unacceptable inspection item(s).

When an inspection reveals unacceptable items(s) these will be documented on the Inspection Report in the deficiency section and entered into the Inspection Log. If the unacceptable item(s) can be brought back into compliance with the required Specifications or Guidelines, a Non-conformance Report shall not be required. After the item(s) have been corrected, then these they will be signed off as complete in the

inspection Log by the QA/QC Department.

A Non-conformance Report shall be written when the item(s) cannot be brought back into compliance with the required Specifications or Guidelines.

The QA/QC Department shall be responsible for the distribution, tracking, acceptance and close out of all Non-conformance Report (NCR). The NCR shall be filled out with all the applicable information in a clear and concise manner. Each NCR shall be given an individual number and entered into the NCR Log.

A copy of all Non-conformance Report shall be currently distributed to the Project Manager, applicable Construction Department and Company Representative.

The QA/QC Department shall track the progress of each NCR until completion, at which time the NCR shall be signed off as completed with the concurrence of the Company. A copy of the completed NCR shall be distributed to all the above mentioned parties.

All original Non-conformance Reports shall be kept on file by the QA/QC Department. This documentation will be maintained and cleared prior to the completion of the Project.

9.0 CONTROL OF SPECIAL PROCESSES

Consideration shall be given to special progresses such as Welding, Hydrostatic Testing, and Post-weld Heat Treatment which may require written instruction beyond that provided by the QA/QC Program. The QA/QC Engineer and Project Manager will evaluate each situation involving a special process on a case –by- case basis. When it is determined that extra written guidance is necessary for the successful completion of a special process, these instructions will be submitted to the Company for review and approval before use.

Personnel who perform the special processes shall be trained in the use of the Equipment, Techniques and written instructions required to produce acceptable Quality Products. The QA/QC Department shall provide additional inspection, as required for these activities to ensure compliance.

10.0 QA/QC DOCUMENTATION

The QA/QC Engineer for the Project shall ensure that all Company Documentation requirements are completely understood and implemented. He shall review the Contract Requirements, Specifications or other Guidelines.

QA/QC Records shall be filed, indexed, and maintained to allow easy access and retrieval. The Documents shall be protected against possible theft, environmental damage and deterioration.

The Proformas listed in Appendix 1 shall be used to document Inspections required by the applicable inspection procedures. Documentation methods, for Inspections other than the Proforma provided, may be used if approved by the QA/QC Manager and Company prior to use. Documentation of inspection results will be made on a daily basis.

All Test results shall be documented on Company supplied Proformas and that generated by the QC Department. When required, the Contractor will develop forms in addition to those provided by this program. Additional Proformas that are developed will be submitted to the Company for approval prior to use.

The QA/QC Engineer shall be responsible for ensuring the proper Proformas are used for Documentation and that these are completed out correctly and maintained as required by this section.

Documentations will be maintained by the QA/QC Department until the completion of the Project. All documents required by the Specifications or Guidelines will be transmitted to the Company for review and acceptance.

11.0 INSPECTION CONTROL

11.1 PIPE/DECKS WELDING

11.1.1 SCOPE

This Section outlines the inspection activities and responsibilities when shop and field welding of ASME/ANSI B31.3, (Process Facilities Piping), ASME/ANSI B31.8 & B31.4 (Gas & Liquid Hydrocarbon) and API 1104 (Pipelines), API RP 14C, 14E etc is performed by the Contractor.

11.1.2 Project Manager or his Designee Functions

- Review the drawing and specifications to define the Project Scope
- Establish priority of Construction Welding.
- Review any design changes and or materials substitutions with the
- Company Engineer and obtain written concurrence.

11.1.2.2 Construction Manager/Superintendent or his Designee

- Route drawing revisions through QA/QC Department for review and weld mark numbering.
- Issue drawing revisions to the QA/QC Department.
- Monitor Construction Welding to ensure compliance with approved procedures and job specifications.
- Determine (with assistance from the QA/QC Department) the type, quantity and personnel to be given welder qualification tests.
- Schedule welder testing with the QA/QC Department.
- Request a copy of the approved Welding Procedures and Qualified Welders Co-ordinated NDE with the QA/QC Department.

11.1.2.3 QA/QC Department Functions

- Establish and maintain document control procedures.
- Issue drawing revisions to the Construction Manager / Superintendent
- Approve and issue welding procedures
- Administer welder qualification testing
- Perform QA/QC Inspections
- Maintain required QA/QC Documentation.

11.1.3 WELDING PROCEDURES

The QA/QC Manager will determine the applicable Welding Procedures for the Project. All Welding procedures shall be submitted to the Company for review and approval before production may begin. Original copies of the required welding procedures can be obtained from the QA/QC Manager. No changes or revisions shall be made to any Contractor Welding Procedures without prior approval from the QA/QC Manager.

11.1.4 WELDER QUALIFICATION

Welder Qualification Test Records (WQTR's) shall be submitted to the Company for review prior to production welding.

When submitting welder qualification papers that are dated past the six (6) months expiration limit, it will be the Contractor's responsibility to provide the Company with a Welder continuity log or verification letter as proof that the Welder(s) has been welding with the same process(es) within the required six (6) months time period.

When proof of performance qualification can not be provided, Welder Qualification Testing shall be performed as follows:

- The Company shall be given notice and the option to witness all welder qualification testing whether performed by the Contractor, or a third party.
- When prior permission is obtained from the Company, the Contractor QA/QC Department will administer welder qualification testing on site.
- Testing will be performed in conjunction with the applicable Construction Code and specifications.
- Each qualified welder will be given an individual ID number and be responsible for stenciling his work with a paint marker or stamp.
- A qualified Welder Roster will be maintained by the QA/QC Department, and updated each time there is a change in status. A copy of this Roster will be distributed to the Company.

11.1.5 WELDING CONSUMABLES

Low hydrogen electrodes shall be stored in the unopened containers until issued for use. Once opened, consumables will be kept in rod ovens set at the temperature recommended by the manufacturer. If the rod manufacturer's recommendations are not available, SFA 5.1 and 5.5 of ASME Section II Part C or AWS 5.1 and 5.5 of the AWS filler metal specification may be used as a guideline.

Portable rod cans and ovens shall be used when low hydrogen electrodes are used for field welding.

Drying of low hydrogen electrodes is allowed. The electrodes shall be placed in a rod oven used specifically for drying, not storage. The manufacturer's recommendations will be used for the drying time and temperature. If the manufacturer's recommendations will be used for the drying time and temperature. If the manufacturer's recommendations are not available, SFA 5.1 and 5.5 of ASME Section II Part C or AWS 5.1 and 5.5 of the AWS filler metal specifications may be used as a guideline.

Cellulose coated electrodes shall be stored in the unopened containers until issued for use. Once open, they shall be kept in an unheated dry location until used. Low hydrogen and cellulose coated filler metal that come into contact with water, grease, or any substance that may contaminate the electrodes shall be discarded.

Bare wire shall be stored in the unopened containers until issued for use. All individual wires shall be tagged, marked or colour coded on one end of the wire for easy identification.

Welding gases shall be marked or tagged so the type and composition can be easily determined.

11.1.6 VISUAL WELD INSPECTION

This Section details the in-house weld Inspection and Fabrication Plan to ensure the adherence to the Company's Project Specifications and applicable Industry Codes. From the AFC Drawings, Weld Maps and Sketches shall be generated. These Weld Maps shall be used for traceability on all NDE Reports and Welder Identification Numbers. The assigned Project Engineer, shall, at all times maintain an update set of AFC Drawings, while the QA/QC Department shall coordinate the NDE Subcontractor and document all Welds and traceability requirements on these drawings as follows:

11.1.6.1 On each Isometric Drawing, a unique Weld Number shall be assigned to each joint to be welded.

- 11.1.6.2 An arrow shall be drawn to connect the Weld number to the corresponding join.
- 11.1.6.3 For welded connections between two Isometric Drawings, the Weld number shall be assigned to the drawing with no continuation lines (Isometric that does not show any Piping weldment, tee, elbow etc. at connection).
- 11.1.6.4 For pipe runs that extend between two Isometric Drawing, the weld number shall be marked on one of the followings and flagged on the other.
- 11.1.6.5 The Weld Number shall be assigned on the Isometric in the direction of flow, starting with number and continuing sequentially.
- 11.1.6.6 Welds requiring repairs will have suffix R-I added.
- 11.1.6.7 Weekly weld countable logs shall be maintained.
- 11.1.6.8 For Piping Welds not shown on Isometric Drawings, but which are reflected on the piping plan and/or standard details, weld numbers shall be assigned as above and an intermediate tracking system shall be developed.

11.1.7 CONTROL ACTIVITIES BEFORE WELDING

The QA/QC Personnel, prior to welding and with the assistance of the applicable Fabrication Personnel shall ensure that:

- 11.1.7.1 The proper Materials have been utilized
- 11.1.7.2 The welder is qualified for the Welding Procedure to be utilized
- 11.1.7.3 Compliance to all variables specified in the WPS, i.e. Pre-heating, Type of Welding Rods, and Interpass Temperatures etc.
- 11.1.7.4 Documentation of all In-house Inspection on the proper formats.

11.1.9 NONDESTRUCTIVE EXAMINATION

Non-destruction examination requests shall be completed and submitted to the NDE

When inspection reveals unacceptable items, they will be entered into the Inspection Log for tracking, or if these can be brought back into compliance with the applicable Contract Documents, Specifications or Codes. When corrective action will not bring these items back into compliance, a Non-conformance Report shall be generated.

Inspection frequencies shall be increased when it is determined that a problem area is developing in a general or specific area of the welding.

Inspections outlined in this Section shall be documented daily on the Proformas Listed in 11.1.10. Testing which is required by the Contract, or Specifications shall be documented on NDE Contractor supplied Performa's.

11.1.12 LIST OF PROFORMAS IN APPENDIX 1

11.1.12.1 Daily Weld Visual Inspection Report No. 011

11.1.12.2 Weld Inspection Summary No. 012

11.1.12.3 Welder's Performance Record No. 010

11.2.2 RESPONSIBILITIES

Implementation of this Control requires the participation of the Project Manager, Superintendent and QA/QC Department.

11.2.2.1 Project Manager or His Designee

Review the Drawing and Specifications to define Project Scope

Establish priority of PWHT

Review any Design changes and Materials substitutions with the Company Engineer and obtain written concurrence.

11.2.2.2 Construction Manager/Superintendent or his Designee

Route Drawing Revisions through the QA/QC Department for Review

Monitor PWHT to ensure compliance with approved Procedures and job specifications.

Request a copy of the approved PWHT Procedures from the QA/QC Department.

Monitor PWHT activities to ensure compliance with approved Procedures and job Specifications.

Co-ordinate NDE (hardness testing) depending on the Specifications and Codes requirements with the QA/QC Department.

11.2.2.3 QA/QC Department

Perform QA/QC Inspections

Establish and maintain Document Control Procedures

Issue Drawing Revisions to the Construction Manager

Maintain required QA/QC Documentation.

11.2.3 POSTWELD HEAT TREATMENT ANALYSIS

This Section is intended for stress relieving of carbon steel heated to below the lower transformation temperature. All other material and temperature ranges will require a separate Guiding principle to be developed prior to use. Specific PWHT Procedure shall be prepared for different projects to be handled.

Upon acceptance of the Non-Destructive Examination results, the thermocouple nuts will be tracked at equal quadrants around the circumference of the pipe approximately 1" from the edge of the weld using a qualified welder and approved Welding Procedure. A spare thermocouple nut will be tacked next to each primary nut for a backup thermocouple.

The required number of thermocouples and heater pads to be used will be determined, from the manufacturers recommendations, by the wall thickness, diameter and orientation of the weld(s) to be Post-weld Heat Treated.

The maximum cooling rate from soak temperature to 800 degrees F Shall be 500 degrees F per hour. Below 800 degrees F, the cooling rate may be uncontrolled. However, the insulation blankets shall be left in place until the weld temperature has reached a minimum of 150 degrees F.

One trained craftsman shall remain at the controls of the equipment during the entire controlled heating and cooling cycle. If a problem occurs with any of the primary thermocouples, he will switch to the secondary thermocouple for that heater pad, this information shall be recorded on the strip chart for reference.

All primary and secondary thermocouple leads will be identified by a separate number tag. These numbers shall remain visible after the weld(s) is completely wrapped. All secondary units will be located next to their primary units for easy identification and access.

Once the primary thermocouples are connected to the appropriate controller terminals, the ceramic heating pads will be installed. Care shall be taken to ensure that the corresponding heater pad and its controlling thermocouple are placed together and connected to the same number terminal on the controller and power source. The number of heater pads shall be determined, from the manufacturers recommendations, by the wall thickness, diameter and orientation of the weld(s) to be Postweld heat treated.

After placement of the heater pads is completed, the insulation blankets will be wrapped completely around the heater pads and sufficient pipe material to ensure uniform heating and cooling can be achieved.

The Company shall be notified before the start of the above mentioned activities, and also before the start of the Postweld Heat Treatment Operations, to provide the opportunity to witness any activities desired.

The controller shall be set on automatic using the following parameters for carbon steel weldments.

The heating rate from ambient to 800 degrees F shall have no restriction; above 800 degrees F the maximum heating rate shall be 400 degrees F per hour.

Soak temperature shall be 1150 degrees F plus or minus 25 degrees F Soak time shall be one hour per inch of wall thickness with a minimum of one hour for any thickness under one inch. The correct soak time for each weld will be made on a case-by-case basis, and subject to the approval of the Company. NDT shall be performed after PWHT.

11.2.4 DOCUMENTATION

Post-weld heat treatment shall be documented on the forms listed in 11.3.5.

The post-weld heat treatment report will be filled out and submitted, along with the

recorded strip chart identified by weld number, line number and isometric number, to the Company for approval.

The approved post-weld heat treatment report(s) and strip chart(s) will be incorporated into the final documentation package for turnover to the Company.

11.3 PIPE/STRUCTURES FABRICATION

11.3.1 SCOPE

This section outlines the Inspection activities and responsibilities when piping and structures are fabricated and erected/assembled by the Contractor.

11.3.2 RESPONSIBILITIES

Implementation of this Control requires the participation of the Project Manager, Construction Manager /Superintendent and the QA/QC Department.

11.3.2.1 Project Manager or his Designee

Review the drawings and Specifications to define Project Scope Establish priority of fabrication and erection Review any design changes and material substitutions with the Company Engineer and obtain written concurrence.

11.3.2.2 Construction Manager/ Superintendent or Designee

Route drawing revisions through the QA/QC Department for review.

Perform field dimensional and material checks to verify fabrication and erection /assembly to the approved Drawings and Specifications.

Ensure the most current and approved drawings are used for fabrication and erection /Assembly.

Monitor piping /structure to ensure fabrication and erection /assembly is being performed to approved Drawings and Specifications.

11.3.2.3 QA/QC Department

Perform QA/QC Inspections

Establish maintain Document Control Procedures

Issue drawing revisions to the Construction Manager /Superintendent

Maintain required QA/QC Documentation

11.3.3 QA/QC INSPECTIONS

In-process Inspection will be performed by the QA/QC Department throughout the duration of the construction, fabrication and erection/ assembly activities. As a minimum, ten (10) percent of each day's activity shall be inspected for:

11.3.3.1 Latest Drawing Revisions

11.3.3.2 Correct Material per Drawings

11.3.3.3 Square and Plumb Piping Installation

All bolted connections shall be performed in accordance with the applicable Company Specifications. The QA/QC Department will supply the Construction Manager /Superintendent with copies of the required Specifications for distribution to the field craftsmen. In-process Inspection will be performed through the duration of bolt up activities. 100% of each day's bolt-ups shall be inspected by the Foreman and /or QA/QC Department for:

11.3.3.1 Correction fit up, alignment and flange face condition

11.3.3.2 Correct gasket type and installation

11.3.3.3 Correct bolt and nut grade and type and length

11.3.3.4 Correct application of required lubricants

11.3.3.5 Correct numbering and torque sequence and values

11.3.3.6 Calibrated torque equipment

11.3.3.7 Correct structural /machine bolting of structural supports

A minimum 10% of the completed bolt-ups and 100% of all completed bolt-ups that will not be hydrostatically tested shall be verified and documented by the QA/QC Department for piping work.

When inspection reveals unacceptable items, they will be entered into the Inspection Log for tracking If they can be brought back into compliance with the applicable

Contract Documents, Specifications or Codes. When corrective action will not bring these items back into compliance, a Non-conformance Report shall be generated.

11.3.4 DOCUMENTATION

Inspections outlined in this procedure shall be documented daily on the Proformas listed in 11.4.5. Testing that is required by the Contract, or the Specifications shall be documented on Company supplied Proformas. When required by Company Specifications, additional documentation of:

11.3.5 LIST OF FORMS IN APPENDIX 1

11.1.12.1 Daily Weld Visual Inspection Report No. 011

11.1.12.2 Weld Inspection Summary No. 012

11.1.12.3 Welder's Performance Record No. 010

11.4 PRESSURE TESTING

11.4.1 SCOPE

This section outlines the Inspection activities and responsibilities when Hydrostatic and Pneumatic Testing is performed by the Contractor. However, a specific Procedure shall be prepared for a specific project.

11.4.2 RESPONSIBILITIES

Implementation of this section requires the participation of the Project Manager, Construction Manager /Superintendent and QA/QC Department.

11.4.2.1 Project Manager or his Designee Functions

Review the Drawings and Specifications to define Project Scope.

11.4.2.2 Construction Manager /Superintendent or his Designee

Route Drawing Revisions through the QA/QC Department for review

Establish priority of testing activities and obtain approval from the Project Manager.

Establish test boundaries and the location of all blinds, spacers, vents, drains and disposition of test fluids.

Establish test fluid, duration and the minimum and maximum test pressure

Define equipment and instrumentation to be included, or excluded from the test.
Sign off mechanical checkout and ready for service on the Pressure Test Report.
Ensure the most current and approved drawings are used for the system preparation and testing.

Sign off ready-for-test, and drained and ready for service on the Pressure Test Report.

11.4.2.3 QA/QC Department

Perform QA/QC Inspections

Issue drawing revisions to the Construction Manager /Superintendent

Maintain required QA/QC Documentation

Sign off welding inspection on the Pressure Test Report.

11.4.3 HYDROSTATIC TESTING

The QA/QC Department shall ensure preparation of the test by the Construction Manager/ Superintendent, and verify that all NDE and repairs have been completed. The Pressure Test Report shall be properly filled out and the test package will include the following item as determined by the type of test prior to releasing the hydrotest package for test:

11.4.3.1 The Pressure Test Report

11.4.3.2 Piping Isometrics, P&ID, or a sketch of the system showing the test boundaries, loca11.4.3.5 Pressure chart recorder calibration

11.4.3.6 Temperature chart recorder calibration

11.4.3.7 Dead weight tester calibration

11.4.3.8 Hydrostatic test and temperature record

11.4.3.9 Fill record.

11.4.4 PNEUMATIC TESTING

Pneumatic testing may be used as a preliminary leak test prior to hydrostatic testing, but shall not exceed applicable Code requirements. When pneumatic system test, the following guidelines shall apply:

11.4.8 TEST ACCEPTANCE

After acceptance of the test, the system will be drained and restored. Punch lists will be used to track incomplete items which did not affect the testing of the system until completion.

11.4.9 SAFETY

Because of the inherent dangers involved with hydrostatic and pneumatic testing, safety shall be the major concern. The following steps shall be minimum precautions when any system is under pressure:

11.4.9.1 Warning signs shall be posted at suitable locations

11.4.9.2 No attempt to repair leaks shall be made while the system is under pressure

11.4.9.3 High pressure test hoses shall be inspected by test personnel before use and shall be installed and routed to avoid possible tripping hazards.

11.4.9.4 Only personnel directly involved with the test shall be allowed in the area

11.4.9.5 The Safety Engineer shall be notified of the time and location of all pressure tests.

11.4.10 DOCUMENTATION

Inspections outlined in this Section shall be documented daily on the Proformas listed in 11.5.11.

11.5 COATINGS

This Section outlines the Inspection activities and responsibilities when coatings are applied by the Contractor.

11.5.2 RESPONSIBILITIES

Implementation of this Control requires the participation of the Project Manager, Construction Manager /Superintendent and the QA/QC Department.

11.5.2.1 Project Manager or his Designee

Review the drawings and specifications to define Project Scope

Establish priority of coating activities

Review any design changes and material substitutions with the Company Engineer and obtain written concurrence.

Superintendent

11.5.2.2 Construction Manager/Superintendent or His Designee

Construction Manager/Superintendent or His Designee

Perform field dimensional and material checks to verify coating activities are being performed to the approved Drawings, Specifications and manufacturer's recommendations.

Ensure that the most current and approved Drawings are used for coating activities.

Perform field dimensional and material checks to verify coating activities are being performed to the approved Drawings, Specifications and manufacturer's recommendations.

11.5.2.3 QA/QC Department

Perform QA/QC Inspections

Establish and maintain document control procedures

Issue drawing revisions to the Construction Manager / Maintain required QA/QC Documentation.

11.5.3 Handling and Storage

Extreme care shall be used in the handling and storage of coated products. Coated pipe spools are especially susceptible to damage, Company Specifications shall be used to determine the handling and storage requirements.

11.5.4 QA/QC INSPECTIONS

In-process coating Inspection will be performed by the QA/QC Department throughout the duration of coating activities. At a minimum, ten (10) percent of each days prime and top coating activities, and 100% of each days internal coating activities shall inspected for:

11.5.4.1 Correct type coating system

- 11.5.4.1 Correct type coating system
- 11.5.4.2 Coating system expiration dates
- 11.5.4.3 Surface preparation and profile
- 11.5.4.4 Manufacturers recommended environmental conditions
- 11.5.4.5 Dry film thickness between coats
- 11.5.4.6 Curing times and temperatures
- 11.5.4.7 Bake times and temperatures
- 11.5.4.8 Dry film thickness and appearance of the final coat
- 11.5.4.9 Colour comparison

When Inspection reveals unacceptable items, these will be entered into the Inspection Log for tracking, if these can be brought back into compliance with the applicable Contract Documents, Specifications or Codes. When corrective action will not bring these items back into compliance, a Non-Conformance Report shall be generated.

Inspection frequencies shall be increased when it is determined that a problem area is developing in a general or specific area of the coating activities.

11.5.5 DOCUMENTATION

Inspections outlined in this Control shall be documented daily on the Proformas listed in 11.6.6.

11.6 FINAL SYSTEM WALKDOWN

11.6.1 SCOPE

This Section outlines the activities and responsibilities when performing the final Systems Walkdown by the Contractor.

11.6.2 RESPONSIBILITIES

Implementation of this Section requires the participation of the Project Manager, Construction Manager /Superintendent and QA/QC Department.

11.6.2.1 Project Manager or His Designee

Review the drawings and specifications to determine if Punch list items are in, or out

11.7 QA/QC RECORDS

This establishes the necessary requirements for Receipts, Review, Filling, Storage and Submission of QA/QC Records.

11.7.7.1 RESPONSIBILITIES

The QC Engineer is responsible for the implementation of this Section and the QC Engineer will perform the origination as well as the submission of the QA/QC Records. The QC Department has responsibilities as follows:

- 11.7.1.1 Generation of QC Formats for assigned sections
- 11.7.1.2 Receipt and Review of QC Records from these sections
- 11.7.1.3 The QC Inspector shall ensure that all required information is filled in accurately in the appropriate format.
- 11.7.1.4 The QC Department will collate all Documents received from the Fabrication Yard and shall include same in project file.
- 11.7.1.5 Construction documents such as Hydrostatic Testing Packages, Material Receiving reports, Pre-commissioning and Calibration Records etc, shall be subject to review by the QC Department.

11.7.2 QC RECORDS FILING AND STORAGE

This Section is to ensure proper Organization and Storage of QC Records. Each Project Filing System shall be established on commencement of the Project. The System shall be organized in a manner to facilitate Document retrieval. Updating of the Filing System is mandatory.

QA/QC Records shall be split into (2) categories:

11.7.2.1 PERMANENT FILES

- 11.7.2.1.1 Welding Procedure Specifications (WPS) and Procedure Qualification Records (PQR)
- 11.7.2.1.2 Welder Performance Qualification Test Records (WPQT)
- 11.7.2.1.3 QC and NDE Personnel Qualification Records.

11.7.2.2 PROJECT FILES

- 11.7.2.2.1 Fabrication Yard QC Records

- 11.7.2.2.2 NCR Reports and Log
- 11.7.2.2.3 As-built Construction Drawings
- 11.7.2.2.4 Hydrostatic Test Report Sheets
- 11.7.2.2.5 Vendor Material and Equipment Test
- 11.7.2.2.6 All Inspection Reports and other Records prescribed by Contract

11.7.3 STORAGE OF QC RECORDS

The QC Records shall be stored in a Controlled Area or Locked Filing Cabinets. All incoming documentation shall be placed in a controlled holding area until it is allocated to the appropriate QC File. The QC Project Files shall be retained until job completion and submit AS-BUILT PACKAGE.

11.8 QA/QC AUDITS

QA/QC Audits are to ensure accuracy and effectiveness of the QA/QC Manual and Quality Proforms developed for individual Projects. Internal Audits shall be scheduled and conducted on Monthly basis by the QC Engineer and Company's Senior Inspector during the course of the Project.

These Audits are to ensure the requirements of this manual and the Project Specifications are adhered to QA/QC Files and Records shall be checked to ensure compliance with the provisions of this manual. On completion of the Internal Audit a comprehensive Report shall be generated and issued to the Personnel in QC Department, the Company Representatives and all relevant Personnel for proper rectification of any discrepancies.

A Department or Personnel not functioning as required shall be Re-Audited within a period of one (1) week to ensure that prescribed corrective actions are implemented.

QUALITY CONTROL PLANS



Diwali Limited Contract Specific Quality Control Plans shall be used on the contract that requires development on award of contract.

The required documents for the project will be procured, produced and reviewed by the QA/QC Manager along with the Business Development Manager based on the realization that there are many plans which require coordinated approach and perfection for successful execution of a project.

Details and specifications of Quality Record Formats and Test Packs and Preliminary Internal Audit Schedule, detailing which areas are to be audited each month will be also provided on award of contract.



COMMUNITY AFFAIRS, SAFETY, HEALTH, ENVIRONMENT AND SECURITY [CASHES] POLICY

Under the Company's CAHSES policy, Diwali Limited Staff and their subcontractors shall conduct all their activities in a manner that:

Preserves the Health, Safety and Security of employees and members of the public who may be affected by Diwali Limited operations or those of its subcontractors.

Minimize the impact of its operations on the environment.

Is sensitive to the needs of the host communities.

The immediate objectives of Diwali Limited CASHES Policy includes:

Community Affairs:

To establish and maintain cordial relationship and to be sensitive to the needs and concerns of the host communities.

Safety:

To improve on Diwali Limited safety record and that of its sub-contractors.

Health:

To plan and carry out all Diwali Limited activities in a manner that preserves the health of all company and sub-contractor personnel.

Environmental:

To reduce the impact of Diwali Limited operations on the environment. To apply all practical and reasonable measures to minimize the generation of waste and to manage and dispose of same in an environmentally-friendly manner, system or process.

Security:

To ensure personnel, property and equipment are secured in all Diwali Limited operations.



DIWALI LIMITED



HSE MANUAL

INTRODUCTION

This HSE Management System seeks to provide a complete and comprehensive guidance for all DIWALI LIMITED project activities in the areas of Health, Safety and Environmental Management System and other Safety Security related areas as may be required for execution of its project. Much emphasis is paid to critical activities, to ensure that they are properly controlled and that measurements are made and reported as to enable the monitoring of the overall performance and identification of areas for improvement.

DIWALI LIMITED, HSE Management of all Line Managed activities in preparing and executing its operations. It defines the policies, objectives, organizational structure, responsibilities, standards, resources, process and controls that are in place to manage Health, Safety and Environmental protection in all phases of our operations, including those activities conducted by our sub-contractors.

This documentation has been prepared to highlight an HSE Management System (HSE-MS) that provides continuity, consistent and structural approach, improvement opportunities and controls supported by procedures and documentation applicable to both marine and non-marine (off vessel) environment.

HSE MANAGEMENT SYSTEM ELEMENTS

1.1 MANAGEMENT COMMITMENT AND LEADERSHIP:

The Management of DIWALI LIMITED assures to provide strong, visible leadership and commitment and ensure that this commitment is translated into necessary resources. To develop operate and maintain HSE Management System and to attain the policy and strategic objectives.

Top Management demonstrates absolute commitment to Project HSE Management by:

- Motivating staff and contractor personnel to adopt high HSE standards.
- Providing both human and material resources to identify, eliminate or reduce and manage HSE risk in balance with business performance, to achieve overall company corporate objectives.

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- Providing both human and material resources to identify, eliminate or reduce and manage HSE risk in balance with business performance, to achieve overall company corporate objectives.

- Involvement in site audits/management facility inspection programmes leading high potential incident investigations.
- Performing HSE meetings/management reviews and providing HSE Competence Assurance.
- Prioritizing HSE matters in management meetings.
- Promoting staff involvement in HSE matters and implementing all Incentive programme to reward excellent HSE performance.

SECURITY POLICY

Our Security Policy seeks to protect personnel lives and assets and on a continuous basis assess security implication and impacts of our operations. To use the best means possible and to endeavour to harness all necessary resources to advantage.

DIWALI LIMITED shall remain fully committed to continually achieving success in this regard by carrying out programs that are designed to address security measures for employees, information and property.

In addition to employing the services of the law enforcement agencies (Nigerian Navy and Police Force) as backup in riot situations, our trained security personnel shall be on guard all the time to protect Company, Client and / or any Third Party assets and personnel involved in our operations.

DIWALI LIMITED shall therefore cooperate and develop interface with the client and third parties to avoid unnecessary delays, shutdown and of course unwarranted loss of man-hours in its projects.

Any Community disturbance or threat shall be reported to CLIENT without delay. Effort shall be made to remain in harmony with the local community in any area of our operations.

DRUG AND ALCOHOL POLICY

It is an offence for any employee of **DIWALI LIMITED** to be under the influence of alcohol or in possession of or under the influence of any non-prescription drug such as cocaine, amphetamine, marijuana, hashish or other illegal or controlled substance while working or residing on any job-site including water borne operation, or property under the control of **DIWALI LIMITED**.

This policy applies to all operations and all locations on a 24-hours basis. Unannounced searches and screening shall be conducted to ensure compliance.

Severe penalty awaits any violations of this policy.

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Severe penalty awaits any violations of this policy.

JOURNEY MANAGEMENT POLICY:

It is an obligation in **DIWALI LIMITED** to plan all journeys before embarking on them to ensure, safety of personnel and equipment, time saving and efficient operation. All journeys are initiated by completing journey Management Forms for approval by the Management, which would be duly checked out at the end of the journey.

By standard, it is the policy of **DIWALI LIMITED** to ensure that its vehicles are fitted with an in vehicle monitory system (IVMS) and marine boats with VHF Radio.

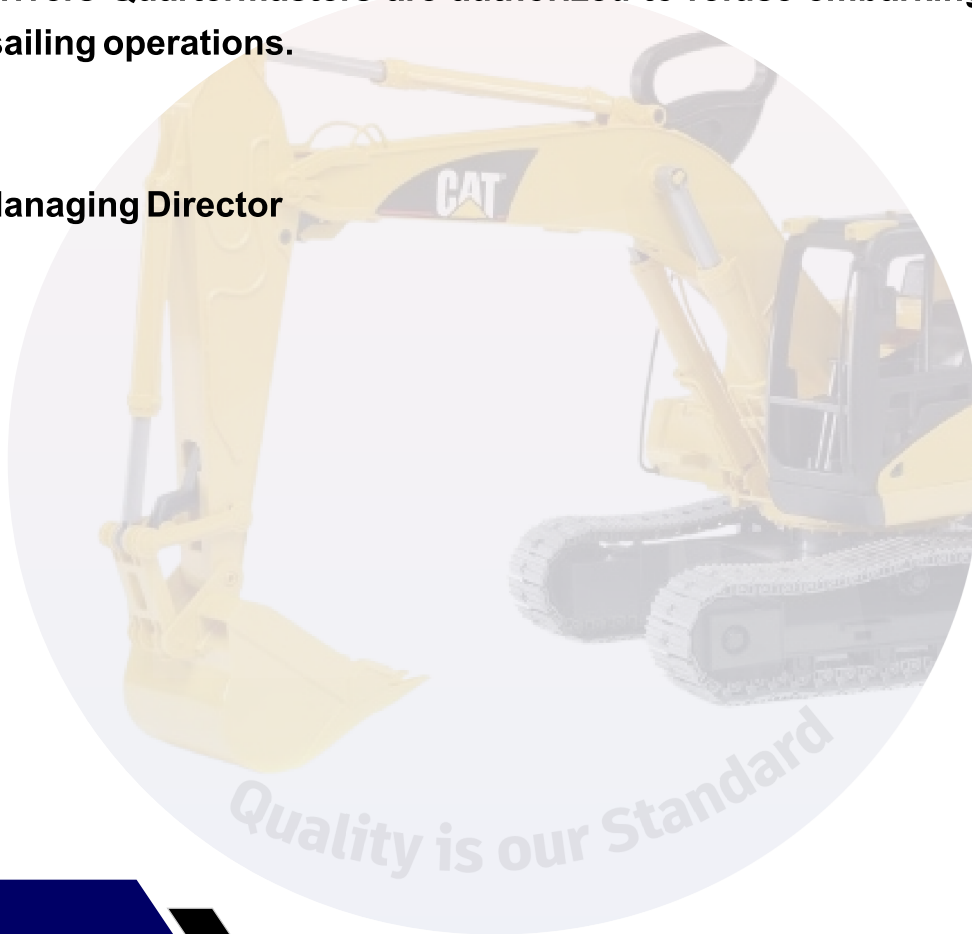
All marine crafts and vehicles for our operations shall be maintained in good repair and fit for purpose at all times.

Operators and Drivers as well as Personnel must be inducted to meeting the requirement of this policy. Accordingly:

- Night Sailing /Driving is hereby prohibited except on Emergency situations.

Drivers Quartermasters are authorized to refuse embarking on night driving /sailing operations.

Managing Director



EQUIPMENT MAINTENANCY POLICY

All equipment **MUST** be regularly maintained. All unserviceable equipment shall be locked out and tagged as thus.

The objective of such routine preventive maintenance is to reduce equipment downtime and lost time incidents resulting from lack of maintenance culture.

Routine maintenance and minor repairs shall be undertaken at the work site while serious maintenance of completely broken down equipment shall be down at the base.

Turn around maintenance shall be planned and executed in accordance with equipment manufacturer's recommendations. The aims being to put all equipment in serviceable order for hitch free operation/use.

It is mandatory that equipment operators report immediately any break down or faults observed in their equipment. Late reportage of faults shall be met with appropriate reprisals.

Toolbox meetings on proposed equipment maintenance **MUST** precede the maintenance work planned for each day.

All maintenance crew must be trained and only experienced personnel shall be job placed and authorized to carryout maintenance and shall be done in accordance with the safe work practices of the company.

It shall be the responsibility of the Project Manager to enforce the implementation of this policy.

MANAGING DIRECTOR

SAFETY DECLARATION

DIWALI LIMITED foremost interest in all projects is the protection of personnel HEALTH and SAFETY and protection of the local ENVIRONMENT; and we will be fully committed to demonstrating SAFETY in all our operations.

We are conversant with CLIENT safety policy and standards, which will be adhered to in conjunction with own HSE policies in the execution of our contract services.

We have familiarized ourselves with requirements for STANDARDS FOR OFF-SHORE PROJECTS MANAGEMENT and will incorporate all standards into our operations.

DIWALI LIMITED will also provide all necessary safety clothing and equipment for all personnel.

We will ensure that personnel engaged in work and services in all projects shall remain medically fit throughout the duration of the contracts. We will be prepared to present certificates of medical fitness on all personnel and ensure that all personnel on water-borne operations have undergone swimming /water survival training.

DIWALI LIMITED shall engage the services of a HSE Manager and a Project Manager who will ultimately be responsible for safety in our operations. The staff will also have experienced safety officers who are well acquainted with relevant statutory and Client's HSE regulations, Work Permit System and Safe Working Practices.

We shall strictly enforce the permit to work system before commencement of any work. Only CLIENT'S authorizations can action any night movement.

DIWALI LIMITED shall continually perform its services in utter compliance with all Statutory Regulations and Contractual requirements for safe and efficient operations. Equal attention shall be paid to HSE matters as well as to cost and/or production.

PERSONAL PROTECTIVE EQUIPMENT (PPE) POLICY

IT SHALL BE THE POLICY OF DIWALI LIMITED TO PROVIDE QUALITY PROTECTIVE EQUIPMENT FOR HER WORKERS ACCORDING TO NEED. CENTRAL IN THE PROVISION SHALL BE VIABLE MACHINERY FOR EDUCATING WORKERS ON THE IMPORTANCE OF THE MATERIALS AND ADEQUATE USAGE.

ACCORDINGLY

- a) ALL WORKERS ON THE SITE SHALL BE MADE TO WEAR THEIR INDIVIDUAL PROTECTIVE EQUIPMENT AT WORK SITES.
- b) NO WORKER SHALL BE ALLOWED TO STAY OR WORK ON SITE WITHOUT A COMPLETE AND APPROPRIATE PPE GEAR.
- c) ADEQUATE ARRANGEMENTS SHALL BE MADE TO STOCK THE MATERIALS ON SITE AGAINST EMERGENCIES AND TO KEEP RECORDS OF SUCH STOCK AS AVAILABLE, INCLUDING REQUISITION RECORDS.

HOWEVER, EFFORTS TOWARDS THIS PROTECTION SHALL BE GUIDED BY A SOUND PPE MANAGEMENT.

MANAGING DIRECTOR

NO SMOKING POLICY

Having recognized smoking as injurious to health and a fire hazard, it shall be **DIWALI LIMITED** policy to:

- Strongly discourage smoking
- Prohibit smoking in our premises and work areas.

MANAGING DIRECTOR



OUR LOCAL CONTENT POLICY 2025



Diwali Limited is committed to promoting sustainable development and economic growth in Nigeria through active participation in local content development. Our Local Content Policy is designed to ensure maximum involvement of Nigerian human and material resources in our road construction projects, in line with national objectives and applicable regulations.

Policy Objectives

- * To maximize the use of Nigerian personnel, materials, and services in all our road construction activities.
- * To contribute to the growth of local capacity by transferring technical skills and knowledge.
- * To foster long-term partnerships with local suppliers, subcontractors, and communities.
- * To support the government's initiatives to increase local content participation in the construction and infrastructure sectors.

Human Capital Development

Diwali Limited prioritizes employment opportunities for Nigerian citizens, particularly from host communities. We are committed to:

- Hiring and training local workers for skilled, semi-skilled, and unskilled positions.
- Providing continuous professional development and technical training to enhance local expertise.
- Encouraging career growth through mentorship, coaching, and on-the-job learning programs.

OUR LOCAL CONTENT POLICY 2025 Con't



Local Procurement and Services

- Preference is given to Nigerian suppliers and service providers in the procurement of goods, equipment, and services.
- We ensure that procurement practices are transparent and inclusive, enabling fair participation of qualified local businesses.
- Strategic partnerships are established to support local manufacturing and service delivery capabilities.

Community Engagement and Social Investment

- * Diwali Limited engages host communities through consultations, collaboration, and shared development goals.
- * We invest in community infrastructure, health, and educational programs to improve the well-being of our stakeholders.
- * We commit to respectful and inclusive interactions with all local groups impacted by our projects.

Monitoring and Reporting

- * Compliance with this policy is monitored through regular audits and reporting mechanisms.
- * Key performance indicators (KPIs) will be used to measure progress in local employment, procurement, and community engagement.
- * Feedback from stakeholders will be incorporated into continuous improvement strategies.

Policy Review

This policy shall be reviewed periodically to align with changes in regulatory requirements, industry best practices, and the evolving needs of local communities and partners.

Signed:

Management
Diwali Limited





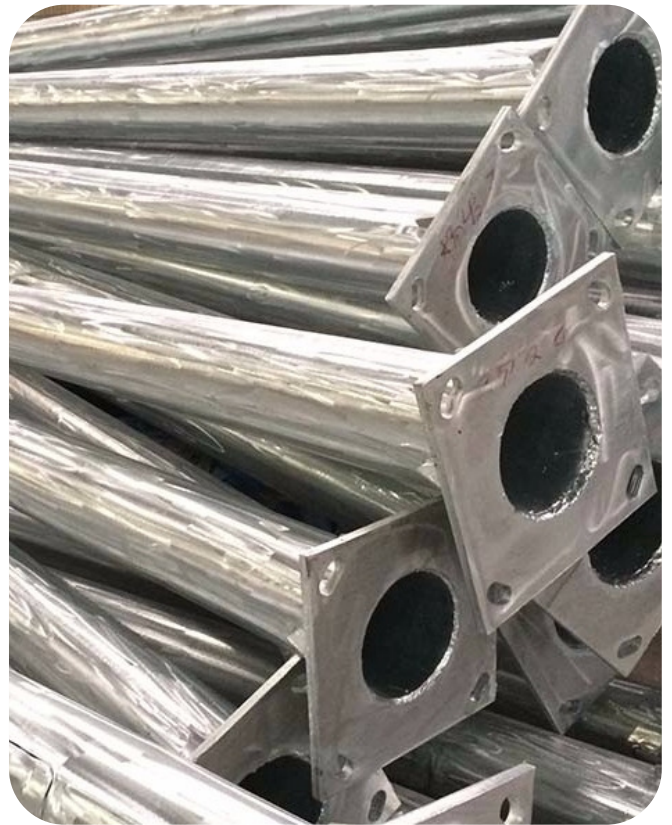
DIWALI LIMITED







DIWALI LIMITED





CONSTRUCTION (Civil)

Our Civil Engineering Design & Construction capabilities cover both Onshore, **Swamp and Offshore facilities focusing on:**

- Overhead Concrete Tanks
- Covered Warehouse foundation
- Road /Reinforced Culverts
- Generator Shed/Security Towers
- Communication Tower & Foundation
- Casing/Pipe Rack foundation





DIWALI LIMITED

**SOME OF OUR
DOCUMENTS**

RC 1546496



**CORPORATE AFFAIRS COMMISSION
FEDERAL REPUBLIC OF NIGERIA**

Certificate of Incorporation

I hereby certify that

DIWALI LTD

*is this day incorporated under the COMPANIES AND ALLIED
MATTERS ACT 1990 and that the Company is Limited By Shares.*

Given under my hand at Abuja this 11th day of December, 2018.



Azuka Obiageli Azinge

AZUKA OBIAGELI AZINGE
Registrar - General

1159285

CORPORATE AFFAIRS COMMISSION
(Established under the Companies and Allied Matters Act 1990)



FORM CAC 1.1

APPLICATION FOR REGISTRATION OF COMPANY

Form Must be Typed and not Handwritten

(Carefully read the Notes overleaf before you fill in the Form)

Type of Company (Tick as appropriate)

LIMITED BY
SHARES☒LIMITED BY
GUARANTEE☐ UNLIMITED

COMPANY NAME

DIWALI LTD**SECTION A: Company Address**

Registered Office Address and Head Office Address if different from Registered Office Address	
* Registered Office Address:	NO. 3 NTA/CHIBA ROAD BY AIRPORT JUNCTION PORT HARCOURT, RIVERS STATE (PORT HARCOURT, RIVERS)
Head Office Address: (If different from Registered Office Address)	N/A
* Email Address:	paulen121@gmail.com

SECTION B: THE AUTHORIZED SHARE CAPITAL OF THE COMPANY IS:

ONE HUNDRED THOUSAND NAIRA	₦ 100,000
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AMOUNT IN WORDS

DIVIDED INTO	100,000	OF ₦	1	EACH
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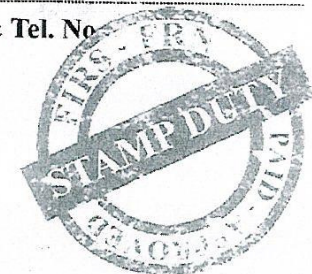
Signature of Director

Name of Director & Tel. No.

Verify Electronic Stamp here:



Stamp Duty Cert. No:



2018-0302-14154-30025

SECTION C: PARTICULARS OF FIRST DIRECTORS & THEIR CONSENT TO ACT

Name and Addresses of Persons who are First Directors of the Company & Their Consent to Act

1.

*Name:	NWALI PAUL CHUKWUEMEKA				
*Residential Address:	NO. 2 HOLYSPIRIT CATHOLIC CHURCH CLOSE, OFF NTA ROAD OZUOBA, RIVERS STATE		*Nationality:	NIGERIAN	
*City:	PORT HARCOURT	*State:	RIVERS	*Country of Residence:	NIGERIA
*ID No:	PHC02267AB92	*ID Type:	Driver's License	*E-mail:	paulcn121@gmail.com
*Date of Birth:	May 6, 1978	*Gender:	MALE	*Phone No:	08033093201

CORPORATE AFFAIRS COMMISSION
YEN AGOA OFFICE
CERTIFIED TRUE COPY

12 DEC 2018

*Signature:

[Signature]

Date:

10/12/18

I consent to be a Director of the above Company

2.

*Name:	NWALI DEBORAH IFEAJULUCHUKWU				
*Residential Address:	NO. 2 HOLYSPIRIT CATHOLIC CHURCH CLOSE, OFF NTA ROAD, OZUOBA PORT HARCOURT, RIVERS STATE		*Nationality:	NIGERIAN	
*City:	PORT HARCOURT	*State:	RIVERS	*Country of Residence:	NIGERIA
*ID No:	RUM21040AA01	*ID Type:	Driver's License	*E-mail:	deborahpaul@gmail.com
*Date of Birth:	Apr 14, 1988	*Gender:	FEMALE	*Phone No:	08030737006

*Signature:

[Signature]

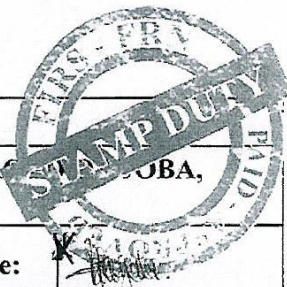
Date:

10/12/18

I consent to be a Director of the above Company

SECTION D: PARTICULARS OF SECRETARY (INDIVIDUAL)

*Name:	NWALI DEBORAH IFEAJULUCHUKWU				
*Address:	NO. 2 HOLYSPIRIT CATHOLIC CHURCH CLOSE, OFF NTA ROAD, OZUOBA, RIVERS STATE (PORT HARCOURT, RIVERS)				
*Phone No:	08030737006	*E-Mail:	deborahpaul@gmail.com	*Signature:	<i>[Signature]</i>
Verify Electronic Stamp here:	http://stampduty.gov.ng/verification		Stamp Duty Cert. No:	2018-9302-14154-30025	



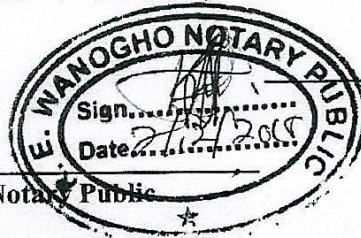
SECTION D1: PARTICULARS OF SECRETARY (FIRM/CORPORATION)

SECTION E: Statutory Declaration of Compliance with the requirements of CAMA by a Legal Practitioner

*Name Of Deponent:	ODHEGBA FRANK O.		
*Address:	PLOT 3162, IBB BOULEVARD, MAITAMA, (ABUJA, FCT)		
*Accreditation No. (If Any):	CAC/IND/NBA/21204	*Phone No:	07068135634

Do solemnly declare that the above proposed company has fulfilled the requirements for its registration

Declared at NOTARY PUBLIC On the 25 day of DEC. 2018



[Signature]
Deponent

Before Me:

Commissioner for Oaths/Notary Public

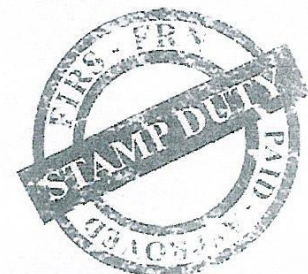
PRESENTED FOR FILING BY

*Name:	ODHEGBA FRANK OVIE		
*Address:	PLOT 3162, IBB BOULEVARD, MAITAMA,		
*Phone No:	2347068135634	*E-Mail:	frankodhegba@gmail.com
Accreditation No. (Where Applicable):	NBA/IND/21204	*Date:	10-12-18

Verify Electronic Stamp here:



Stamp Duty Cert. No:



2018-0302-14154-30025

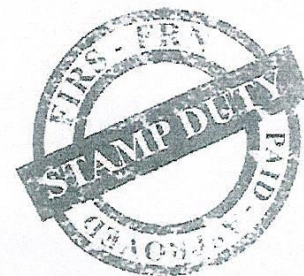
Notes:

- a) A copy of either the Data Page of International Passport, driver's license or National Identity Card of every individual director, subscriber and secretary must be attached to this application. For non-Nigerians only Data Page of International Passport is acceptable.
- b) Directors must be individuals and not below the age of 18 years. See section 257 CAMA for other grounds of disqualification.
- c) Minors can subscribe to the shares of the company provided there are atleast two other qualified persons.
- d) A copy of Birth Certificate of every minor that is a subscriber issued by the National Population Commission or Data Page of International Passport must be attached.
- e) Where a corporate body is a subscriber or nominates a director to the board for a fixed term, a board resolution to that effect must be attached. For a corporate body registered outside Nigeria, a copy of certificate of registration duly translated if not in English Language must in addition be provided.
- f) The minimum share capital for a private company is N10,000 and N500,000 for a public company. Atleast 25 percent of the nominal share capital must be issued at all times. Please check the guidelines of other regulatory bodies for the capital requirements for companies operating in those sectors.
- g) A company limited by guarantee should not be registered with a share capital. The Commission is also required by law to refer the memorandum to the Attorney General of the Federation for approval before registration.
- h) Foreigners that are directors or subscribers using Nigerian addresses must attach copies of their residence permit. Other foreigners should use their residential addresses in their country of residence.
- i) This form must be accompanied by duly signed and stamped copies of the memorandum and articles of association. Companies are required to adopt the applicable model articles in Table 'A' of CAMA. Any modification to the table must be highlighted and registered together with the memorandum.
- j) A first director or subscriber can prepare or present the incorporation documents directly to the Commission for processing. The use of accredited professionals is no longer necessary provided all matters incidental to the registration are complied with.
- k) All asterisked fields on the form are mandatory



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Stamp Duty Cert. No:



2018-0302-14154-30023

FEDERAL REPUBLIC OF NIGERIA
COMPANIES AND ALLIED MATTERS ACT, 1990
COMPANIES LIMITED BY SHARES
MEMORANDUM OF ASSOCIATION
OF

DIWALI LTD



1. The name of the Company is: **DIWALI LTD**
2. The Registered office of the Company will be situated in Nigeria.
3. The objects for which the Company is established are:
 - A. To carry on the business of oil and gas services, independent petroleum marketing, support to oil and gas energy services, dealer in oil and gas related services, supply of petroleum and petrochemical products, including engine oil, gas and kerosene. To locate and mine solid minerals, and to erect other similar structures for the purpose of distribution and storing of petroleum products
 - B. To carry on the business of general contractors, general suppliers, provisions/cosmetic, importers, exporters of general goods and services, environmental cleaning and waste disposal services, man power supply, manufacturer representatives, trading of all kinds of goods and services, general merchandise, oilfield services, marine/safety products, safety gadgets supply, supply of oil tools equipment/services, mechanical, electrical works, civil works, procurement /logistics, property development to act as manufacturers, distributors, manufacturers agents and to engage in stocking of materials, warehousing and marketing services thereof.
 - C. To carry on the business of information communications technology (ICT) & computer systems design and servicing, printing, internet payment systems, web services and designs, supplies and marketing of computer components, peripherals and software and hardware, Auto CAD, macro station, mat lab, computer development, maintenance/installation services.
 - D. To establish business of trading outlets, super-markets, departmental stores, for the sale of all kinds of products whether by wholesale or retail and whether as manufacturers and distributors of general goods and as proprietors of super-markets and departmental stores of all descriptions and distribution of beverages.
 - E. To do all such other things as may be considered incidental or conducive to the attainment of the above objects or any of them.
4. The Company is a private company
5. The liability of the members is limited by share.
6. The nominal share capital of the Company is 100,000 divided into 100,000 ordinary shares of 1 each.

We, the several persons whose names and addresses are subscribed hereunder, are desirous of being formed into a Company in pursuance of this Memorandum of Association, and we respectively agree to take the number of shares in the capital of the Company set opposite our respective names.

SN	NAME AND ADDRESS OF SUBSCRIBER	NO. OF SHARES TAKEN BY EACH SUBSCRIBER

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2018-0302-14154-30025

Name:	NWALI PAUL CHUKWUEMEKA	70,000
Address:	NO. 2 HOLYSPIRIT CATHOLIC CHURCH CLOSE, OFF NTA ROAD OZUOBA, RIVERS STATE (PORT HARCOURT, RIVERS)	
Name:	NWALI DEBORAH IFEAJULUCHUKWU	
2 Address:	NO. 2 HOLYSPIRIT CATHOLIC CHURCH CLOSE, OFF NTA ROAD; OZUOBA PORT HARCOURT, RIVERS STATE (PORT HARCOURT, RIVERS)	30,000

Dated this 07th day of 12 20 18

Particulars of witness to the above signatures: -

Name of Witness: ODITEGBA - O - FRANK

Address of Witness: Plot 3162 IBB Boulevard maitama Abuja

Occupation of Witness: Legal Practitioner

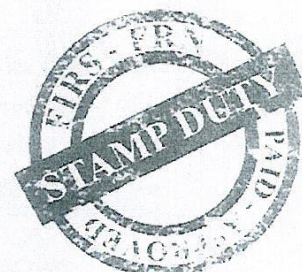
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12 DEC 2018

CORPORATE AFFAIRS COMMISSION	
YENAGOA OFFICE	
CERTIFIED TRUE COPY	
NAME.....	
DESIGNATION.....	
SIGN.....	



2018-0302-14154-30025

FEDERAL REPUBLIC OF NIGERIA
COMPANIES AND ALLIED MATTERS ACT, 1990
COMPANIES LIMITED BY SHARES
ARTICLES OF ASSOCIATION
OF

DIWALI LTD

1. NOTICE

A notice may be given by the company to any member either personally or by sending it by post to him or to his registered address, or (if he has no registered address within Nigeria) to the address, if any, within Nigeria supplied by him to the company for the giving of notice to him. Where a notice is sent by post, service of the notice shall be deemed to be effected by properly addressing, prepaying, and posting a letter containing the notice and to have been effected at the expiration of seven days after the letter containing the same is posted.

2. THE SEAL

The directors shall provide for the safe custody of the seal, which shall only be used by the authority of the director or of a committee of the directors authorised by the director that behalf and every instrument to which the seal is affixed shall be signed by the director and countersigned by the secretary or by a second director or by some other person appointed by the directors for the purpose.

3. VOTING

No member shall be entitled to vote at any general meeting unless all calls or other sums payable by him in respect of shares in the company have been paid.

4. MEETINGS

The annual general meeting shall be held at such time and place as the director shall appoint. The chairman, if any, of the board of directors shall preside as chairman at every general meeting of the company, or if there is no such chairman, or if he is not present within thirty minutes after the time appointed for the holding of the meeting or is unwilling to act, the director present shall elect one of their number to be chairman of the meeting. If at any meeting no director is willing to act as chairman or if no director is present within thirty minutes after the time appointed for the holding the meeting, the members present shall choose one of their number to be chairman of the meeting.

5. ALTERATION OF CAPITAL

The company may from time to time by ordinary resolution effect an alteration of its share capital in the ways set out in section 100 of the Act. Subject to the provisions of the Act on reduction of capital, the company may, whenever it considers it expedient to do so, by special resolution reduce its share capital, redemption fund or any share premium account.

6. COMMISSIONS AND BROKERAGE

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Company may exercise the powers of paying commissions conferred by section 131 of the Act, provided the rate per cent or the amount of the commission paid or agreed to be paid shall be disclosed in the manner required by the said section. Such commission may be satisfied by the payment of cash or the allotment of fully or partly paid shares or partly in one way and partly in the other. The company may also on any issue of shares pay such brokerage as may be lawful.

7. PRE-EMPTIVE RIGHTS OF SHAREHOLDERS OF THE COMPANY

The company shall not allot any new or unissued shares unless the same are offered in the first instance to all the shareholders or to all the shareholders of the class or classes being issued in proportion as nearly as may be to their existing holdings. The offer to existing shareholders shall be by notice specifying the number of shares to which the shareholder is entitled to subscribe and limiting a time, not being less than twenty-eight days after the service of the notice, after the expiration of which the offer, if not accepted, will be deemed to be declined. On the receipt of an intimation from the shareholder that he declines to accept the shares offered or after the expiration of the stipulated time, as the case may be, the board of directors may, subject to the terms of any resolution of the company, dispose of the shares at a price not less than that specified in the offer, in such manner as they think most beneficial to the company. Regulations 4 and 5 above are not alterable except with the unanimous consent of all the members of the company.

8. RESTRICTIONS ON TRANSFER OF SHARES

The directors may in their absolute discretion and without giving any reason, refuse to register any transfer of any share, whether or not it is fully paid share.

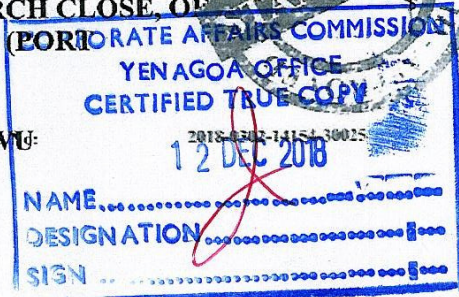
9. CLASS OF SHARES

The company may from time to time issue classes of shares. It shall be the responsibility of the directors to determine the classes of shares to be issued. All the rights or restrictions attached to each particular class of shares shall be specified in the terms of issue but such rights may at any time be varied in accordance with the provisions of section 141 of the Act.

10. INTERPRETATION

In this regulations, "the Act" means the Companies and Allied Matters Act.

Unless the content otherwise requires, words or expressions contained in these regulations bear the same meaning as in the Act.

SN	NAME AND ADDRESS OF SUBSCRIBER	SIGNATURES
1	Name: NWALI PAUL CHUKWUEMEKA Address: NO. 2 HOLYSPIRIT CATHOLIC CHURCH CLOSE, OPORTA ROAD OZUOBA, RIVERS STATE (HARCOURT, RIVERS)	 
2	Verify Eligible Stamp here: NWALI IDORAHIFE JULIUS CHUKWUEMEKA	

Address:

NO. 2 HOLYSPIRIT CATHOLIC CHURCH CLOSE, OFF
NTA ROAD, OZUOBA PORT HARCOURT, RIVERS
STATE (PORT HARCOURT, RIVERS)

#signature

Dated this

09th

day of

12

20

18

Particulars of witness to the above signatures: -

Name of Witness:

ODHEGBA

- O. FRANK

Address of
Witness:

Plot 3162 PBB Boulevard Maitama Abuja

Occupation of
Witness:

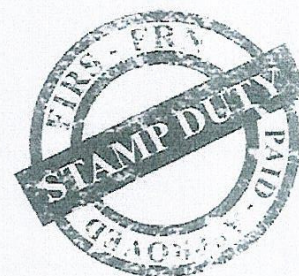
Legal Practitioner



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