

CODE OF CONDUCT

Dear colleagues,

As an internationally active company specialising in complex planning and design services for demanding architectural and engineering projects, we are aware of our responsibility to society, both now and in the future. Our work is guided and characterised by fundamental ethical values. We in the company management understand and emphasise that compliance with legal requirements, and ethical behaviour, are essential requirements for Inros Lackner's sustainable success.

We maintain a zero-tolerance policy towards misconduct. Unethical behaviour such as corruption, fraud, discrimination, harassment, human rights violations or of any other form will not be tolerated and will be met with appropriate consequences.

To ensure our continued success as a group of companies, we wish to shape the future of Inros Lackner together. Acting as one, we aim to consistently interact with our colleagues, clients, suppliers, business partners, competitors and society in an open, honest, committed and ethical manner.

This Code of Conduct is designed to help you to align your professional conduct with the values and guidelines of Inros Lackner at all times and to make responsible decisions. If you are unsure how to act appropriately in certain situations, please speak to your manager or compliance officer (at our international locations, your compliance representative), or contact us directly.

We ask that you read this Code of Conduct carefully and familiarise yourself with the values of Inros Lackner. Align your decisions and actions in your daily work at Inros Lackner with the Code of Conduct's rules and guidelines. We encourage you to speak openly with your manager or compliance officer if you become aware that Inros Lackner's rules of conduct are not being complied with.

INROS LACKNER SE company management

CODE OF CONDUCT

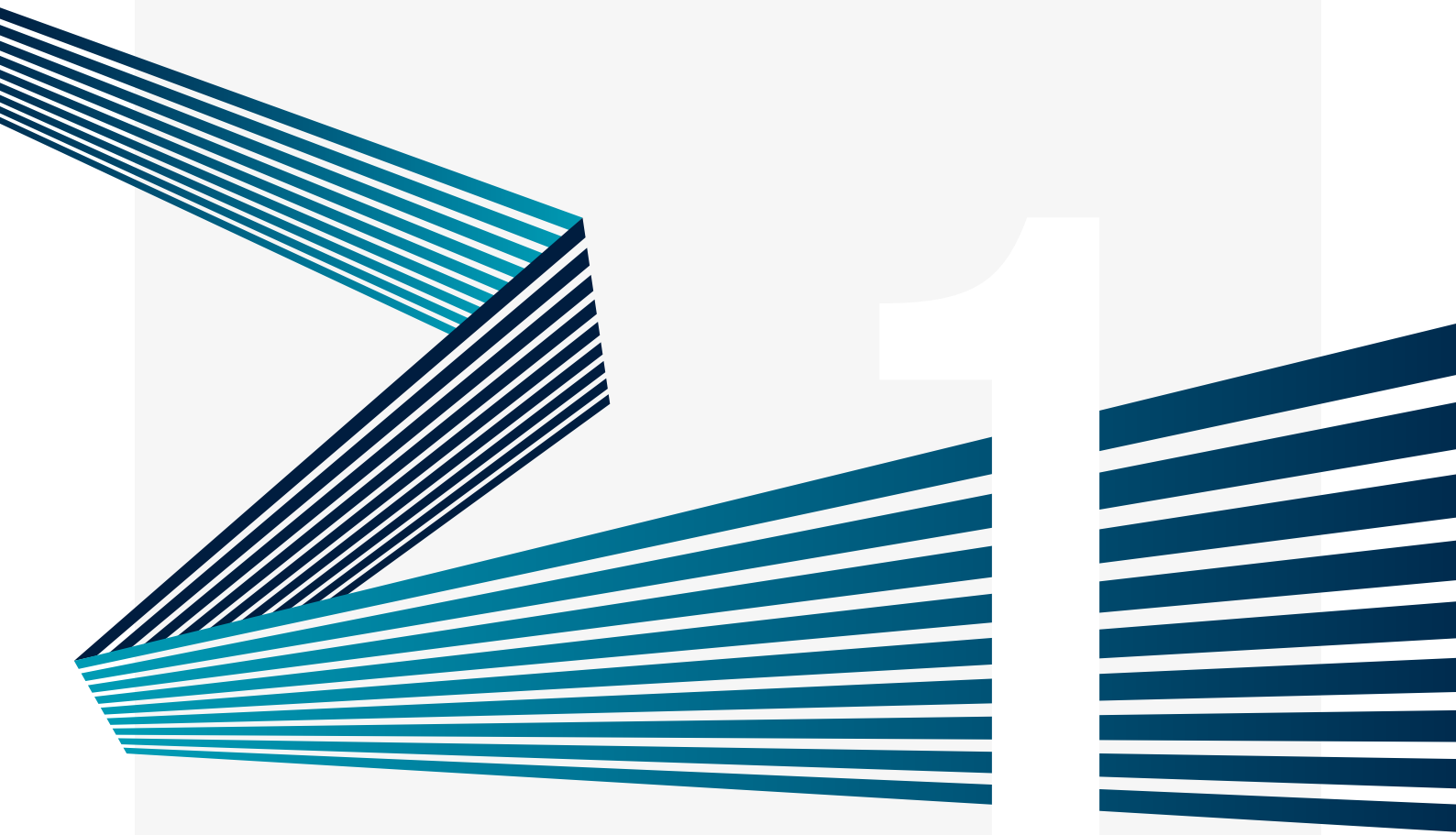
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Gender notice

We use gender-neutral terms for persons (e.g. employees) wherever possible; otherwise, the generic masculine form is used.

Please note that this document is a translation from the German original which remains the authoritative version.

VALUE-ORIENTED CORPORATE MANAGEMENT



Value-oriented corporate management

As a provider of complex engineering and architectural services for international projects, we at Inros Lackner understand the importance of acting in accordance with laws and regulations. Our values form the foundation of our corporate culture. In all business decisions and actions, both domestically and internationally, our values must be respected and all applicable laws and regulations must be observed. In particular, our values include commitment, honesty, responsibility, trust, respect, tolerance and innovation.

The rules of conduct outlined in our Code of Conduct apply to all employees of Inros Lackner SE and its subsidiaries and affiliated companies (collectively, „Inros Lackner“). Here, the term “employees” includes management as well as all other permanent and temporary staff, including all freelance/unsalaried workers. The rules of conduct and the expectations that apply to our business partners are set out in our Code of Conduct for Business Partners.

As an independent group of companies that is free from third-party interests, we strive to work together with clients, contractors and employees from diverse cultural and national backgrounds in a spirit of tolerance and respect. As an internationally active company, we uphold the highest quality standards. This applies both to our external actions and to our interactions with one another. All employees are therefore responsible for adhering to the rules of conduct. In the modern business world, responsibility is more

than just a concept – it forms the foundation of our actions and fundamentally influences our decisions. Responsibility means being aware of the impact of our actions and acting appropriately with respect to our staff, our business partners and society as a whole. For us, it is a key principle that we value all individuals and treat them with respect and consideration. We always approach problems with a solution-oriented mindset and with a willingness to be open to different perspectives and opinions.

We are committed to open, transparent and honest communication. Our managers, understanding that they are role models in terms of adhering to the rules, take this very seriously and foster a culture of open learning from mistakes. Honesty and integrity are the foundation of our actions and the basis for a trusting working relationship. We have a zero-tolerance policy for misconduct. All employees are encouraged to report any behaviour that is not in accordance with our Code of Conduct. We respond appropriately and promptly to reports of violations or misconduct.

This Code of Conduct refers to other internal company guidelines that must also be adhered to.

Do



- ▶ We carefully consider our decisions.
- ▶ We take responsibility for adhering to this Code of Conduct.
- ▶ We support and respect our colleagues, advocate for them, and address conflicts and risks as team players.
- ▶ We are always aware that our behaviour serves as an example to others and behave respectfully, modestly and with integrity.
- ▶ We encourage direct feedback and strive to maintain a trusting environment.

Don't



- ▶ We do not make hasty or ill-considered decisions.
- ▶ We do not ignore signs of potential discrimination.
- ▶ We do not spread rumours about our colleagues.
- ▶ We do not shirk responsibility or hide behind hierarchies.
- ▶ We do not assume we already know everything, because learning never stops.

RULES OF CONDUCT AT INROS LACKNER



Rules of conduct at INROS LACKNER

2.1 Compliance with laws and international standards

For Inros Lackner, sustainable business practices are inextricably linked to compliance with international standards and laws. These form the binding framework for our daily operations. As an internationally active company, Inros Lackner expects its managers to be familiar with applicable national laws and to ensure compliance within their area of responsibility.

Should national regulations deviate from the rules of conduct outlined in this Code of Conduct, the stricter rule or regulation shall prevail in each case. In all business transactions and decisions, we comply with the applicable laws and regulations of the countries in which we operate. Law-abiding conduct is a key principle for us.



Responsibility requires rules – Integrity begins with commitment.

2.2 Human rights and non-discrimination

Respect for human rights is of paramount importance to us. We firmly believe that long-term economic success can only be achieved through ethical and responsible conduct. In our business activities, we clearly acknowledge our responsibilities with respect to human rights and commit ourselves to respecting them and promoting their observance. We recognise the Universal Declaration of Human Rights and the core labour standards of the International Labour Organization (ILO). The core labour standards include the abolition of forced or compulsory labour, the abolition of child labour, and the elimination of discrimination in employment and occupation. They also include freedom of association and the right to collective bargaining.

All employees must contribute to upholding human rights, must consider them a fundamental principle, and must remain vigilant for potential violations in their environment. If necessary, they must inform their manager or the Compliance Department, enabling next steps to be discussed.

All people have the same rights, regardless of family origin, gender, religion, nationality or other factors. We respect diverse backgrounds, opinions and perspectives, and maintain a work environment free from discrimination and harassment. Managers bear a special responsibility as role models. Inros Lackner's success is based on the excellent collaboration of all employees worldwide. This collaboration is characterised by openness, respect, tolerance and professionalism. Inros Lackner considers diversity to be a strength and rejects all forms of discrimination.

Sexual harassment and all other forms of harassment are prohibited. Employees who experience harassment have the right to protect themselves, to remove themselves from the harassment situation, and to report the harassing behaviour. It does not depend on whether perpetrators consider their own behaviour acceptable.

Decisions are made transparently and based on objective criteria to ensure that all those involved are treated fairly and are granted appropriate rights and opportunities. We place great value on open communication and fair discussion of differing opinions to maintain a spirit of trusting and productive collaboration.

Every manager at Inros Lackner must act appropriately as a role model and is responsible for ensuring a discrimination-free and harassment-free environment within their area of responsibility. Inros Lackner maintains a strict zero-tolerance policy towards all violations of human rights. This includes, in particular, modern slavery and child labour – both within the company and throughout the entire supply chain.

Do



- ▶ We are vigilant in identifying and reporting violations of human rights.
- ▶ We treat all individuals with respect and dignity.
- ▶ We consider the opinions and perspectives of all those involved and respect their viewpoints.
- ▶ Should we, in the course of our work, have the impression that someone is in imminent danger, we will immediately contact the police or another competent authority and also inform Inros Lackner without delay.
- ▶ In our work, we ensure that all employees and business partners are treated fairly and respectfully.
- ▶ We promote equal opportunities.

Don't



- ▶ We do not ignore or deny any signs of human rights violations and we do not hesitate to report them, even if they involve employees of business partners.
- ▶ We do not tolerate disrespectful, discriminatory or harassing behaviour.
- ▶ We do not make decisions that unfairly disadvantage others or that cannot be reasonably explained.
- ▶ We do not attempt to address suspected or actual violations on our own – we utilise official reporting channels.

2.3 Remuneration and freedom of association

The economic success of Inros Lackner depends strongly on the commitment, qualifications and performance of our staff. Therefore, we are committed to offering our employees fair remuneration and creating a work environment that allows for a healthy work-life balance. We respect the right of our employees to form or participate in trade unions or alternative representative bodies,

and we promote open, fair and constructive cooperation with such bodies. The management of each foreign company/subsidiary (outside Germany) is responsible for compliance with applicable labour laws. National regulations regarding maximum working hours must be strictly observed. Our salaries and benefits shall meet or exceed legal requirements.

We act with conviction – clearly and responsibly.

2.4 Occupational health & safety and work-product reliability

At Inros Lackner, we ensure a safe and healthy working environment. We are committed to strict adherence to safety regulations and practices. Preventive measures to avoid accidents, and relevant training, are integral parts of our occupational health & safety efforts. Every office location has members of staff that provide support in relation to occupational health & safety. They regularly inspect workplaces and equipment, report deficiencies to those with responsibility for occupational health & safety and fire protection, and draw attention to unsafe behaviour. Occupational health & safety information and documents are available on the company SharePoint.

Our services and work products are always aimed at the highest quality standards and based on applicable technical regulations and regulatory requirements. This helps us ensure that our services and work products are safe and compliant.

Do



- ▶ We report immediately if we discover that safety, health or workplace integrity is jeopardised in any way.
- ▶ We always watch out for potential health & safety hazards and ensure that they are appropriately addressed before we begin work.
- ▶ We strive to completely prevent workplace accidents and work-related illnesses.
- ▶ We take responsibility for our own safety and health, as well as that of others.

Don't



- ▶ We do not make any exceptions in observing the policies and processes designed to protect health and safety.
- ▶ We do not accept compromises when it comes to these issues.
- ▶ We report accidents immediately to our supervisors or the responsible occupational safety officer.
- ▶ If we discover that someone is working under unsafe conditions, we inform the responsible persons.

2.5 Conflicts of interest

At Inros Lackner, we always make our decisions based solely on objective criteria in the best interests of Inros Lackner. All employees must avoid situations in which their own interests could conflict with the interests of Inros Lackner. Private and professional interests must be kept separate. Should potential conflicts of interest arise, they must be disclosed. For example, if decisions also affect personal financial or business interests, or if there is a family relationship or a close friendship with a business partner, this must be disclosed to the direct supervisor in order to avoid any appearance of a conflict of interest.

Objectivity as a foundation –
Responsibility begins with clarity.

Do



- ▶ If we have questions, we contact the HR or Compliance Department.
- ▶ We disclose conflicts of interest to ensure that they are handled and documented properly.
- ▶ We openly discuss potential conflicts of interest with our direct supervisor.

Don't



- ▶ We avoid situations that could give the impression that our personal interests influence our professional decisions.
- ▶ Actively ignoring and concealing conflicts of interest can harm not only Inros Lackner but also the individuals involved.
- ▶ All relevant information regarding an actual or potential conflict of interest must be disclosed.



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2.6 Corruption and inducements

Inros Lackner does not tolerate corruption in any form. We do not allow ourselves to be unduly influenced and do not grant any benefits to representatives of government institutions or business partners in order to improperly influence decisions. Our actions are always characterised by integrity. Inros Lackner pursues a zero-tolerance policy regarding corruption. This means that all employees are prohibited from paying, offering, accepting or permitting bribes and kickbacks, either directly or through third parties. Gifts, invitations or sponsorships may constitute prohibited benefits if they

exceed the usual and reasonable limits. They may not be granted in direct connection with a business decision if this could create the impression of improper influence. Particular caution is required when dealing with public officials and elected representatives, as such dealings involve greater legal risks.

Inros Lackner prohibits so-called facilitation payments. These are small, unofficial payments to public officials intended to expedite or initiate regular administrative processes. Sponsorship activities may

only serve to enhance Inros Lackner's image. What is given and the benefit received must be proportionate. It is important to avoid even the appearance of undue influence.

Further guidelines can be found in the company's internal policy relating to compliant dealings with clients and business partners, and these must be followed as appropriate. In case of doubt, always inform your manager or the Compliance Department.

Do



- ▶ We participate in the appropriate compliance training.
- ▶ We always act with honesty and integrity in our professional environment and ensure that our conduct complies with anti-corruption laws as well as internal guidelines and standards.
- ▶ All business decisions must comply with legal requirements and internal guidelines.
- ▶ We familiarise ourselves with internal regulations before giving or accepting any gift or benefit, including in the form of a business lunch or dinner.
- ▶ We report any gifts or invitations that exceed the established value limit.
- ▶ As soon as we notice any indication of corruption, we report it immediately.
- ▶ We inform the Compliance Department if we have reason to believe that a business partner has requested or demanded an unlawful payment.

Don't



- ▶ If a payment or gift is not permitted under internal regulations, we do not circumvent this by using a third party.
- ▶ We do not accept or grant valuable gifts, sums of money (even small amounts) or other financial benefits in order to give anyone an undue advantage. Even small bribes intended to expedite administrative processes are prohibited.
- ▶ We do not offer or give expensive or elaborate invitations or gifts – this includes cash gifts, vouchers or other comparable inducements. We also decline to accept any such offers or gifts.
- ▶ We do not accept bribes and avoid any behaviour that could give the impression of undue influence.

2.7 Fair competition

Inros Lackner is committed to fair and unbiased competition. Any restriction of free competition is unacceptable. We always treat our business partners and competitors fairly and do not enter into any anti-competitive agreements. As market participants, we always act freely and avoid any appearance of collusion. Price fixing and sharing confidential information with competitors is strictly prohibited. Anti-competitive behaviour can not only damage the company's reputation but also lead to substantial fines and claims for damages. Our business operations are always based on the merit principle, the market economy and fair competition. We welcome competition with other companies, always adhering to the applicable laws and ethical standards. Our success is based on performance and quality. At conferences, trade fairs and association/industry meetings, we only share information that does not restrict competition. We do not exchange confidential market or company information with our competitors.

Do



- ▶ We limit discussions with competitors to general, non-specific topics.
- ▶ We ensure that Inros Lackner's internal information is suitably protected when we leave the workplace or work at external locations.
- ▶ Should copyrighted or confidential documents containing information about competitors and belonging to them or to third parties accidentally come into our possession or be used by us, we will report this immediately to our supervisor and the Compliance Department.
- ▶ We will only agree to exclusivity agreements or similar clauses after prior consultation with the Compliance Department.

Don't



- ▶ We avoid participating in meetings where competitors share sensitive business data.
- ▶ We also avoid participating in discussions concerning price fixing, market sharing, profit margins or client allocation.
- ▶ We will not use illegal methods to obtain information from competitors.

2.8 Non-public information and financial documents

As a globally active provider of services, we obtain confidential information that can significantly influence the price of our business partners' shares or bonds. We only share this confidential information when it is absolutely necessary for a specific project. Otherwise, we do not share it with our colleagues or third parties, nor do we use this information for our personal benefit, as this would constitute insider trading. If you are unsure whether certain information

qualifies as „non-public information,“ please contact the company's compliance officers or the company management before disclosing or using it privately. We are also aware of the importance of market transparency and recognise that accurate and reliable financial and business records are crucial for all companies. We comply with all legal requirements relating to proper accounting and financial reporting.

2.9 Data protection and data security

The responsible and trustworthy handling of personal data is a central component of Inros Lackner's corporate culture. Personal data is only processed if and to the extent permitted by local laws and regulations. We aim to collect personal data sparingly and we make processing operations transparent to achieve a consistent level of data protection. We work to ensure secure data exchange throughout the entire value chain. Only licensed software may be used. Only strong passwords should be

used, along with additional authentication factors. We pay suitable attention to data security by taking all appropriate measures regarding the confidentiality, integrity and availability of stored information. In particular, Inros Lackner has implemented technical and organisational measures (TOMs) to protect data from unauthorised access, misappropriation or loss. This also applies to the data of our clients, business partners and employees. As a digital company, we constantly encounter new cyber

threats such as phishing, ransomware, social engineering and zero-day exploits. We remain vigilant and immediately report any suspicious activity to our management. We process personal data only as permitted by law and in accordance with the applicable TOMs. We protect such data from loss, unauthorised access, disclosure and misuse in order to safeguard the rights of data subjects.

Do



- ▶ Any data breach must be reported immediately.
- ▶ We collect personal data only to the extent necessary for lawful and legitimate purposes.
- ▶ Our digital technology is used to ensure client satisfaction and to further develop the skills of our employees.

Don't



- ▶ We do not collect sensitive data without the explicit consent of the data subject unless such collection is legally required.
- ▶ We do not automatically assume that personal data collected for one purpose may also be used for other purposes.
- ▶ We do not share sensitive information.

2.10 Protection of property, IP and trade secrets

We handle Inros Lackner's assets with care and diligence, and we respect the assets of our business partners. Inros Lackner's company resources may only be used for business purposes. Private use is strictly prohibited unless expressly permitted in exceptional circumstances. We respect the intellectual property of Inros Lackner, as well as that of our clients, business partners and other third

parties. This includes all patents, copyrights, trademarks and know-how. Any unauthorised use is prohibited. We maintain confidentiality regarding trade secrets and other confidential information, both during our employment with Inros Lackner and after this has come to an end.

2.11 Export controls and sanctions

As an internationally active company, we comply with applicable trade regulations and sanctions laws, in particular those of the European Union. These include financial, trade and travel sanctions as well as embargoes against individual countries, persons, organisations and sectors. Employees must immediately report any suspicion that a transaction or business partner may be subject to sanctions to the Compliance Department or company management. Violations of sanctions laws can lead to serious legal and financial consequences and damage the company's reputation. We only work with business partners that are not on any sanctions lists relevant to us, in particular the World Bank List of Ineligible Firms and Individuals, the European Union's sanctions lists and applicable BAFA lists.



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2.12 Prevention of money laundering

Inros Lackner is committed to complying with all applicable laws and regulations relating to the prevention of money laundering. We only accept funds from legal sources. Any indications of money laundering, such as unusual payment methods, suspicious use of escrow accounts or any general lack of clarity regarding payments, must be reported to company management or the Com-

pliance Department. Beyond this, Inros Lackner conducts business exclusively with trusted clients operating in legitimate sectors. Inros Lackner also refuses to participate in business activities that enable business partners or third parties to commit or facilitate tax evasion. Refunds to third parties may only be issued to the original payment account.

Do



- ▶ Before commencing business with new clients, we thoroughly vet them with regard to AML (Anti-Money Laundering) and KYC (Know Your Customer) regulations.
- ▶ It must be ensured that clients actually exist and that their funds originate from legitimate sources.
- ▶ Particular caution is required when dealing with clients who have connections to politically exposed persons or public officials.
- ▶ We also watch out for signs of possible tax evasion.

Don't



- ▶ We do not accept client payments that do not come from official client accounts.
- ▶ Agreements may only be entered into if the financial aspects and systems are clearly and adequately documented.
- ▶ We ensure that we do not enter into client relationships or continue existing relationships without AML clearance.
- ▶ We refrain from working with clients whose ownership structures are unclear or untraceable.

2.13 Cooperation in the supply chain

At Inros Lackner, we pay attention during the selection of our business partners to how they adhere to the principles of our Code of Conduct. We have established corresponding rules of conduct in our Code of Conduct for Business Partners. We select our business partners carefully and based on objective criteria. All Inros Lackner employees represent our values and advocate for their being observed, including with companies in our supply chain. We involve

the responsible departments early in the procurement process and consider the relevant principles. Payments are made only for services actually provided and must be appropriate. Since we frequently collaborate with third parties, we conduct thorough risk assessments to ensure that they share our zero-tolerance policy towards corruption. We monitor such collaboration to ensure that third parties meet the required standards of quality and integrity.

2.14 Environmental protection

As a globally operating company, we bear responsibility for ensuring the environmental compatibility and sustainability of our products and our office locations. In our professional activities, we pay attention to environmental protection and use resources and energy responsibly. We are committed to ensuring that our activities have the least possible impact on the environment and always comply with applicable environmental regulations. Our responsibility for environmental protection encompasses all our activities and the entire value chain. We strive to operate our facilities safely, to continuously reduce the environmental impact of our business activities, and to actively contribute to environmental and climate protection as well as the conservation of natural resources.

We are committed to responsible procurement practices and expect our service providers and our suppliers to adhere to comparable standards regarding human rights, environmental protection and working conditions. We integrate environmental, social and governance (ESG) factors into our decision-making. We firmly believe that sustainable and responsible business practices create long-term value and minimise risks for all stakeholders.

Do



- ▶ We promptly report any situation that could cause local environmental pollution.
- ▶ We observe local regulations and rules aimed at reducing environmental impact, e.g. by optimising energy consumption or properly separating waste.
- ▶ We require all business partners to improve their environmental performance and comply with applicable environmental protection laws as well as Inros Lackner's specific requirements.

Don't



- ▶ We do not accept environmentally harmful practices of business partners that would not be permitted at Inros Lackner.
- ▶ If waste separation is possible, we ensure that waste types are not mixed.

BINDING NATURE OF THE CODE OF CONDUCT



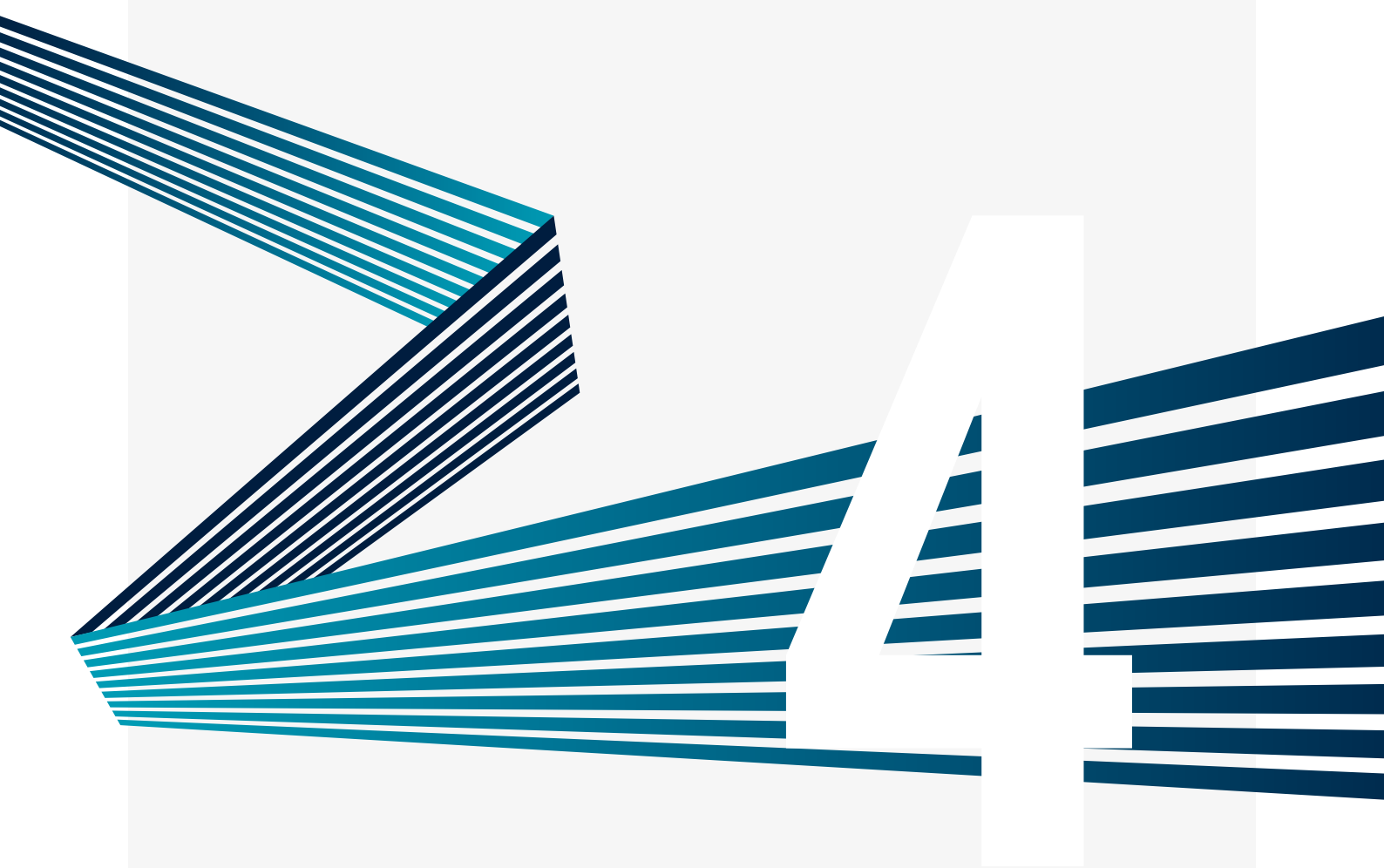
Binding nature of the Code of Conduct

This Code of Conduct establishes a binding framework that applies to all employees of Inros Lackner. It supports us in making ethical decisions, and in acting responsibly and in accordance with regulations. Violations of laws, regulations or internal rules have no place at Inros Lackner. They contradict our culture, our corporate values, and our expectations of ourselves and our business partners. Violations not only pose a significant risk to Inros Lackner in terms of fines, penalties, financial damages and reputational damage, but also represent a significant liability risk for the individual involved. As an employee, you are required to be familiar with the binding Code of Conduct. It is binding for all employees, including management, as well as all permanent and temporary staff and all freelance/unsalaried workers. Violations of these rules of conduct may lead to employment law-related consequences.

Ethical conduct is not just an ideal. It is Our Standard.



COMPLIANCE AT INROS LACKNER



Compliance at INROS LACKNER

4.1 General information about compliance at INROS LACKNER

This Code of Conduct is the central element of the Inros Lackner compliance system. All employees are responsible for adhering to the rules of conduct and upholding the company's values. Values-based conduct by all employees is at the heart of our compliance culture. Our managers serve as role models in this regard. They are particularly committed to the values and rules of conduct within their teams, and integrate them into everyday routines, decisions and actions. They also work to ensure that legal requirements and internal regulations are communicated clearly to their teams – for example, through training.

4.2 Contact persons

In everyday work, situations can arise at any time in which we are unsure how to behave appropriately. The rules of conduct set out in this Code of Conduct are intended to help you reflect on your own decisions and actions and to align these with the values of Inros Lackner. In case of any questions or uncertainty, please contact your manager.

Alternatively, you can also contact the central Compliance Manager at: eugenia.parassidi@inros-lackner.de

You can reach the external Compliance Officer, Attorney Dr. Philipp Horrer, at: horrer@h2w-strafrecht.de

4.3 Whistleblower system

We encourage all employees to report violations of laws and internal regulations to their managers or our Compliance Department as early as possible. However, we understand that there may be cases in which people wish to remain anonymous or require special protection. We have established a whistleblower system specifically for this purpose. This enables suspected violations of applicable laws and suspected serious breaches of internal regulations to be reported in a protected manner.

Technical measures and established processes are applied to protect the confidentiality and anonymity of whistleblowers. All involved parties are bound to secrecy. We protect whistleblowers from any disadvantage or punishment that might arise from a report made in good faith. Report incidents. Treat the system with respect. Trust in your special protection as a whistleblower. Feel free to consult the Compliance Department if you have any questions. Don't look the other way. Do not misuse the whistleblower system or maliciously fabricate incidents to harm others.

You can find the whistleblower system at the following link or on our website: <https://whistlefox.heuking.de/start/inroslackner/de/423EF50D3A34B0120499015A676AD8ED>

If you have any questions about this Code of Conduct or any other compliance-related matters, please feel free to contact your supervisor or the Compliance Manager at any time.

Thank you for your cooperation!



INROS-LACKNER.DE

Berlin | Bremen | Cottbus | Dresden | Essen | Freiburg | Garbsen | Hamburg | Hanover | Jena | Karlsruhe | Magdeburg | Munich | Osnabrück | Potsdam | Rostock | Saarbrücken | Schwerin | Stralsund | Stuttgart | Weimar | Benin | Cambodia | Cameroon | Congo | Czech Republic | Guinea | India | Kenya | Mozambique | Senegal | Tanzania | Togo | Vietnam