

ANTI-CORRUPTION & ANTI-BRIBERY POLICY*Good Knight Security Services*

<p>Document Reference: GKS-COM-POL-002 – Anti-Corruption and Anti-Bribery Policy Version: 1.0 Effective Date: April 2026 Review Cycle: Annual Approved By: CEO</p>

1. Executive Commitment

Good Knight Security Services (GKS) is committed to conducting all business and operational activities honestly, fairly, transparently, and in accordance with applicable law and recognized ethical standards.

GKS adopts a zero-tolerance approach toward bribery, corruption, fraud, extortion, kickbacks, facilitation payments, theft, dishonest recordkeeping, misuse of authority, and any improper advantage obtained through personal influence or abuse of position.

As a private security provider, GKS recognizes that corruption can create serious operational, legal, reputational, and human rights risks. Corrupt practices may contribute to unsafe operations, unlawful treatment of persons, diversion of assets, unfair procurement outcomes, and loss of client confidence.

Integrity is therefore essential to responsible security services and sustainable business conduct.

2. Purpose

The purpose of this policy is to:

- Prohibit corruption and bribery in any form
- Promote transparent and ethical business practices
- Protect GKS, employees, clients, and stakeholders from risk
- Prevent corruption linked to operational abuse or misconduct
- Establish reporting, investigation, and accountability mechanisms
- Strengthen confidence in GKS governance and controls

3. Scope

This policy applies to:

- Directors, shareholders, and senior management
- All employees and consultants

- Guards, supervisors, drivers, operational staff, and support personnel
- Finance, procurement, HR, and administrative staff
- Agents, intermediaries, subcontractors, suppliers, and third parties acting on behalf of GKS
- All tenders, contracts, procurement, licensing, operations, payments, and commercial activities

Compliance with this policy is mandatory.

4. Prohibited Conduct

GKS strictly prohibits:

- Offering, promising, giving, requesting, or accepting bribes
- Kickbacks, secret commissions, or improper referral payments
- Facilitation payments intended to improperly influence routine actions, unless there is an immediate threat to health or safety
- Extortion, coercive demands, or abuse of authority for payment
- Fraud, false invoicing, or dishonest accounting
- Theft or misuse of company or client property
- Undisclosed conflicts of interest
- Gifts or hospitality intended to improperly influence decisions
- Use of third parties to perform prohibited acts indirectly
- Retaliation against persons reporting concerns in good faith

Violations may result in disciplinary action, termination, civil recovery, and referral to competent authorities.

5. Bribery and Improper Advantage

No employee or representative of GKS may offer, request, or accept anything of value to improperly influence:

- Tender awards or evaluations
- Contract renewals
- Licensing or permits
- Recruitment or promotion decisions
- Security clearances or access permissions
- Inspections, audits, or regulatory decisions

- Invoice approvals or payments
- Commercial opportunities or competitive advantage

This prohibition applies whether the benefit is cash, gift, travel, hospitality, employment opportunity, personal favor, discount, or any other item of value.

6. Security Operations Specific Risks

Because GKS operates in the security sector, the following conduct is specifically prohibited:

- Demanding unauthorized payments at gates, checkpoints, or access points
- Accepting money or favors to permit unauthorized entry
- Ignoring violations in exchange for payment
- Selling shifts, posts, or duty assignments improperly
- Accepting payment to overlook misconduct
- Misuse or diversion of weapons, ammunition, fuel, radios, vehicles, uniforms, or client assets
- Charging unofficial fees to employees, applicants, visitors, or vendors
- Protecting illegal activity in exchange for payment

7. Gifts, Hospitality and Courtesy

Reasonable and lawful business courtesies may be acceptable where modest, infrequent, transparent, and not intended to influence a decision.

Personnel must not offer or accept gifts or hospitality that:

- Create an actual or perceived conflict of interest
- Influence or reward a decision
- Breach client rules or local law
- Are excessive in value or frequency
- Could damage confidence in impartial decision-making

Where uncertain, employees shall seek management guidance before proceeding.

8. Conflicts of Interest

Personnel must avoid situations where personal interests conflict, or appear to conflict, with company interests.

Examples include:

- Undisclosed family or financial links with vendors
- Personal ownership interest in a supplier
- Hiring decisions involving close relatives without disclosure
- Use of company information or position for private gain
- Outside business activities creating divided loyalty



Actual or potential conflicts must be declared promptly.

9. Procurement and Tender Integrity

GKS is committed to fair and transparent procurement and tender participation.

Personnel must not:

- Share confidential bid information improperly
- Collude with competitors, bidders, or vendors
- Manipulate prices or competition
- Submit false qualifications, references, or certifications
- Misrepresent staffing, equipment, or capability
- Influence evaluators improperly
- Conceal material risks or legal issues

All submissions must be truthful, accurate, and properly authorized.

10. Accurate Books and Records

All transactions must be recorded accurately and supported by appropriate documentation.

The following are prohibited:

- False invoices
- Duplicate billing
- Hidden payments
- Off-book accounts
- Misclassified expenses
- Fake vendors
- Payroll fraud or ghost employees
- False attendance, guard roster, training, or deployment records
- Falsified incident or investigation reports

Financial and operational records must reflect the true nature of events and transactions.

11. Third Parties and Business Partners

Corruption risks may arise through agents, subcontractors, suppliers, or intermediaries.

GKS expects third parties acting on its behalf to comply with standards consistent with this policy.

Reasonable controls may include:

- Due diligence checks
- Verification of ownership or legitimacy
- Contractual compliance clauses

- Review of services rendered
- Invoice and payment scrutiny
- Audit rights where appropriate
- Suspension or termination rights for serious breaches

GKS shall not knowingly ignore serious misconduct by third parties acting on its behalf.

12. Reporting Obligations

All personnel have a duty to report suspected bribery, corruption, fraud, theft, extortion, or related misconduct.

Reports may be made through:

- Supervisory chain
- Management
- Finance or compliance focal point
- HR
- Confidential channels where available

Failure to report serious misconduct may itself be subject to disciplinary review.

13. Investigation and Corrective Action

All credible allegations shall be reviewed promptly, fairly, and proportionately.

Corrective action may include:

- Formal investigation
- Suspension pending review
- Disciplinary warning
- Termination of employment or contract
- Recovery of losses where lawful
- Referral to competent authorities
- Strengthened controls or retraining
- Removal from sensitive duties

14. Training and Awareness

Relevant personnel shall receive training appropriate to their role, which may include:

- Anti-bribery obligations
- Conflict of interest awareness
- Procurement integrity
- Accurate recordkeeping
- Security sector corruption risks
- Third-party risk management
- Reporting obligations

- Consequences of violations

Training shall be refreshed periodically.

15. Non-Retaliation

Retaliation against any person who raises concerns in good faith, refuses improper instructions, or cooperates with an investigation is strictly prohibited.

Retaliation may result in disciplinary action.

16. Management Responsibilities

Managers and supervisors are responsible for:

- Leading by example
- Promoting a culture of integrity
- Monitoring corruption risks within their area
- Escalating concerns promptly
- Ensuring proper approvals and controls
- Taking corrective action where required
- Supporting fair investigations

17. Governance and Review

This policy shall be reviewed annually or earlier following:

- Serious incidents
- Legal or regulatory changes
- New markets or operations
- Client requirements
- Internal lessons learned
- Relevant International Code of Conduct Association developments

18. Final Statement

Good Knight Security Services affirms that corruption and bribery are incompatible with professional security services, human rights standards, and responsible business conduct.

All personnel are expected to uphold both the letter and spirit of this policy at all times.