

Code of Conduct Policy

EPM Global Ltd – Issue 1 – Uncontrolled when printed

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Revision History

Review No	Last Review Date	Description	Current Review Date	Reviewed by
1.0	1/3/26	Issue	1/3/27	Director

1. Introduction & Purpose

The Code of Conduct Policy of EPM has been developed around a core set of values, which are fundamental to the organisation's development and success. The purpose of this policy is to define the activities required to ensure that there is an organisation-wide understanding both of the company's ethical standards and the behaviours which all employees are required to demonstrate and which are not prejudicial or cause harm to the company or to any of its stakeholders.

This Code of Conduct forms part of the EPM Global Ltd. Security Operations Management System (SOMS) and supports its implementation across all operations.

2. Scope

This policy applies to all employees of EPM and applies at all times and locations.

3. Application

EPM and its employees will at all times demonstrate the highest levels of integrity, truthfulness, and honesty in order to uphold both personal and corporate reputations and to inspire confidence and trust in their respective actions. The company will conduct its business in a competent, fair, impartial, and efficient manner.

4. Corporate Social Responsibility

EPM are committed to being a good corporate citizen, taking account of the economic, social and environmental impact of our business and aiming to maximise the benefits and minimise any negative impact of our operations.

5. Human Rights

EPM is committed to delivering high standards of human rights. The guidelines provided by EPM are:

- We aim to apply the new United Nations Guiding Principles on Business and Human Rights (2011) — based on the International Bill of Human Rights and the ILO Declaration of Fundamental Principles & Rights at Work (1998) — across our operations.
- EPM Human Rights policy demonstrates our commitment to respect human rights and embodies our particular understanding of their significance for a global security company of our scale and diversity.
- The Human Rights Guidelines will set out our expectations for the conduct of all companies in the group, our employees and those with whom we do business.
- We will endeavour to work with business partners who conduct their business in a way that is compatible with our policies of respect for human rights and ethical conduct.
- We will work with customers to ensure that contractual requirements do not infringe human rights.
- We will take measures to ensure that the work of our employees does not compromise internationally accepted human rights conventions, whilst recognising and respecting the diversity in local cultures across the different countries in which we operate.

EPM is working within the scope of ANSI/ASIS PSC.1-2022 Management System for Quality of Private Security Company Operations and ISO 18788, which incorporates elements of the Montreux Document and ISO 9001.

As such, it they must:

- Establish Norms of Behavior and Codes of Ethical Conduct.
- Ensure staff are appropriately vetted.
- Ensure sub-contractors uphold satisfactory standards and adhere to EPM policies.
- Have procedures to treat all persons with dignity and respect for their human rights.
- Have Rules for the Use of Force authorised by a competent legal authority and conduct ongoing training in this.
- Have internal and external complaint and grievance procedures.

This includes:

- Making compliance with the Code an integral part of contractual agreements with personnel and subcontractors.
- Agreeing not to contract with, support or service any government, person, or entity in a manner that would be contrary to United Nations Security Council sanctions.
- They must not, and requires that their personnel must not, participate in, encourage, or seek to benefit from any national or international crimes.
- They will report, and require that their personnel report, known or reasonable suspicion of the commission of any proscribed acts including but not limited to war crimes, crimes against humanity, genocide, torture, enforced disappearance, forced or compulsory labour, hostage-taking, sexual or gender-based violence, human trafficking, the trafficking of weapons or drugs, child labour or extrajudicial, summary or arbitrary executions.
- They must not solicit or pay bribes or inducements.
- They must ensure that all personnel receive professional training and are also fully aware of the Code and all applicable international and relevant national laws, including those pertaining to international human rights, international humanitarian law, international criminal law and other relevant criminal law.
- They must not possess nor use weapons or ammunition which are illegal under any applicable law; does not engage in any illegal weapons transfers.
- They must maintain reports documenting any incident involving its personnel that involves the use of any weapon or any escalation of force.
- They must not tolerate harassment and abuse of co-workers by its personnel.

Any use of force must be lawful, necessary and proportionate, and in line with applicable legal frameworks and company procedures, with a strong emphasis on de-escalation.

6. The Environment

EPM will conduct our business with respect and consideration for the environment and we will strive actively to reduce our overall impact on the environment.

7. Local Communities

We conduct our business with respect and consideration for the good of local communities, taking steps to minimise any disturbance as a result of our operations. We will also serve local interests by providing good employment opportunities and effective services and products.

8. Standards of Business Practice

EPM is committed to high ethical standards in our business dealings to ensure the integrity of our employees and our organisation is maintained.

9. Bribery and Corruption

EPM is resolutely opposed to bribery and corruption in whatever form it may take — refer to Anti-Fraud, Bribery and Corruption Policy.

10. Political Contributions

We do not make contributions to political parties, political candidates or organisations that are politically active. We understand that the only exceptions to this might be in countries where there is a legal requirement to do so or where there is an established, lawful and generally accepted practice to do so.

11. Treatment of Customers

Mutual trust and confidence between EPM and our clients is vital. All employees should strive to consistently deliver service excellence and value for money, meeting clients' expectations and anticipating their changing requirements.

12. Internal Suppliers

Any business transactions between EPM and other business units, for the supply of goods or services should be based on normal 'arm's length' business principles. These principles should cover pricing and other contractual terms and must be as defensible as those to which independent parties might be expected to agree.

13. External Suppliers

All suppliers are entitled to fair treatment and all potential suppliers should have a reasonable opportunity to win our business. It is our policy to pay suppliers on time in accordance with agreed terms of trade. We set high standards for our suppliers in the context of our own ethical policy and trading policies to which they will need to abide by and may at times be audited to.

14. Competition

We will always compete vigorously, but in a fair and ethical way. Competitive success is built on providing good value and service excellence. Competitors should not be disparaged. When in contact with competitors, employees will avoid discussing confidential information and no attempt will be made to improperly acquire competitors' trade secrets or any other confidential information. Employees must not publicise, discuss or share with competitors (even indirectly) pricing strategies or undertake any arrangements or practices, which would conflict our business laws.

15. Our Approach to Corporate Governance

EPM is committed to protecting the interests of our shareholders and our organisation through compliance with the relevant legal and regulatory environments and careful management of business risks.

All activities shall be conducted with due consideration of identified risks, in line with the company's Security Risk Management processes.

16. Accounting Standards and Records

All accounting documentation must clearly identify the true nature of business transactions, assets and liabilities in conformity with relevant regulatory, accounting and legal requirements. No record or entry may be false, distorted, incomplete or suppressed. All of our reporting must be accurate and complete and in compliance in all material respects with accounting policies and procedures. Employees must not materially mistake or knowingly misrepresent management information for personal gain or for any other reason.

17. External Reporting

EPM may be required to make statements or provide reports to regulatory bodies, government agencies or other government departments. Care should be taken to ensure that such statements or reports are correct, timely and not misleading. The Senior Management Team must be made aware of any sensitive disclosure before it is made. Care must also be taken when making statements to the media that information given is correct and not misleading. Enquiries from the media should be referred to the Senior Management Team and statements should only be made by designated spokespersons. EPM will provide, through the Company website and through accounts and other statements, appropriate information to enable stakeholders to assess our business performance. We will comply with applicable laws as to the disclosure of information about EPM.

18. Commitment to Employees

We are committed to optimising individual and business performance through employing the best people at all levels and creating an environment in which they want to and are able to contribute fully to the business' success. To achieve a working environment in which team spirit and commitment to the goals and values of EPM are maintained, we will ensure that individual employees are treated fairly and with dignity and respect.

18.1 Confidential Information

Employees must not make use of confidential information obtained through their employment for personal gain. The disclosure of confidential information to any third party during or after employment is not permitted unless the disclosure has been appropriately authorised, is for a legitimate business reason and the information is being securely communicated. 'Confidential information' is either information that has been specifically described as being confidential or is otherwise obviously confidential from the surrounding circumstances. The term 'confidential information' does not include information in the public domain or information which the individual concerned is required by law to disclose.

18.2 Conflicts of Interest

Every employee has a duty to avoid business, financial or other direct or indirect interests or relationships which conflict with the interests of the Company, or which divides his or her loyalty to the Company. Any activity which even appears to present such a conflict must be avoided or terminated unless, after disclosure to the appropriate level of management, it is determined that the activity is not unethical or improper, does not compromise integrity and is not detrimental to the reputation and standing of EPM.

18.3 Social Networking

Employees who engage in social networking on websites or in groups which show any association with, or make reference to, EPM, are expected to behave in ways that are consistent with our values and policies. Employees must therefore ensure that the company is not exposed to legal or reputational risks and the safety and security of employees, customers and the general public are not undermined.

19. Staff Complaints, Concerns and Suggestions

Staff can expect that we will give due consideration to their constructive suggestions and will provide a considered and objective review of genuine concerns and complaints. Such concerns include fraud, misrepresentation, theft, harassment, discrimination and noncompliance with regulations, legislation, policies and procedures. Concerns will be investigated impartially so that the employee's rights are protected. Employees who have concerns about potential unethical behaviour should advise their immediate supervisor or if required a Director in the first instance. Employees may do this anonymously if they so wish. A Confidential Hotline (email and phone) is implemented. To ensure that confidentiality is maintained, employees should not discuss such concerns with colleagues or other third parties, unless specifically authorised or unless it is a legal requirement. If the employee is dissatisfied with the response to the concern which they have raised, or if the concern relates to a matter of exceptional gravity or sensitivity, he or she can escalate the issue to the Managing Director.

20. Compliance with National Regulation

We will comply fully with all relevant national and international laws, as detailed in our legal register, and will act in accordance with local guidelines and regulations, including taxation and those, which are industry specific, governing our operations. It is the responsibility of all managers to ensure, by taking legal or other expert advice where appropriate, that they are aware of all local laws and regulations which may affect the area of the business in which they are engaged, including tax and exchange controls.

In dealing with its employees, EPM will act in compliance with national regulatory requirements. Employers' obligations to employees under labour, taxation or social security laws and regulations must be respected.

20.1 ILO Declaration on Fundamental Principles and Rights at Work

EPM supports the four fundamental principles in the ILO Declaration. Thus, in accordance with local legislation and practice we will respect freedom of association and the right to collective bargaining, employment will be freely chosen with no use of forced or child labour, and we will not discriminate on the basis of gender, colour, ethnicity, culture, religion, sexual orientation or disability.

20.2 Harassment

Harassment can be defined as unwanted behaviour, which a person finds intimidating, upsetting, embarrassing, humiliating or offensive. Conduct involving the harassment (racial, sexual or of any other kind) of any employee is unacceptable. Any allegations of harassment will be investigated without delay, and with impartiality and confidentially.

20.3 Equal Opportunity

EPM values all of its employees for their contribution to the business. Opportunities for advancement will be equal and will not be influenced by considerations other than their performance, ability and aptitude. Employees will also be provided with the opportunity to develop their potential and, if appropriate, to develop their careers further with the company.

20.4 Health & Safety

We place the highest priority on promoting the health and safety of employees whilst at work. In particular, we will constantly review the effectiveness of our methods of operation to best protect those who work in a high-risk environment.

20.5 Employment Longevity

EPM and our employees will work towards creating permanent long-term relationships. Employees will be paid for and work hours at least as favourable as the terms established by national legislation or agreements or industry standards.

20.6 Pre-employment Screening and Selection

In order to protect the interests of its employees and customers, and because of the nature of our business, we will apply rigorous pre-employment screening and selection techniques.

21. Implementation

This Code of Ethics Policy is to be accessible to all staff members. Ethics training will be provided and an annual sign-off implemented. The Business Ethics Policy is to be promoted by the company management with content reflected where appropriate in training, and via other internal communications channels.

22. Policy Adherence

At EPM, we aim to maintain high ethical standards in carrying out our business activities, practices of any sort that are incompatible with our principles and policies are not tolerated. Strict adherence to these principles and supporting policies is a condition of employment in the business. Any action by an employee, which deliberately or recklessly breaches this ethics policy, may result in disciplinary action and where appropriate, criminal proceedings will be instituted.

23. Policy Review and Monitoring

We monitor, on a regular basis, compliance with this Code of Conduct, using on-going management reporting. The Company will periodically review this Code to ensure its continuing practicality, relevance and continual improvement.

24. Document Control

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