



SAM SECURITY SERVICES

Code of Ethics Policy

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SAM Security Services Whistleblowing Policy

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Code of Ethics Policy

1.0 Code of ethics policy

1.1. This is the SAM Code of Ethics policy. This policy is complemented by the SAM Grievance and Whistleblowing policies as well as the SAM code of Conduct.

2.0 Policy brief & purpose

2.1. The SAM code of ethics policy aims to give our employees guidelines on our business ethics and stance on various controversial matters. Personnel must use their better judgment, but this policy aims to provide a concrete guide for personnel to fall back on if they are unsure about how they should act (e.g. in cases of conflict of interest). This policy will also outline the consequences of violating our business code of ethics.

2.2. All persons working for or with SAM must always abide by local, national & international law.

3.0 Scope

3.1. This policy applies to everyone SAM employs or has business relations with. This includes individual people such as employees but also business entities, such as vendors, subcontractors and clients.

3.2. SAM personnel will undergo induction training at the start of employment covering the Code of Ethics, Grievance and Whistleblowing procedures and this information will be publicly available on the website <https://SAM.com/about-us-2/> and acknowledgement of the policy awareness will be recorded.

3.3. Continuation training will cover these 3 policies annually.

3.4. This policy will be delivered to SAM employees in their native language.

3.5. It is the responsibility of all SAM Employees and subcontractors to ensure they are aware of these policies.

4.0 Policy elements

4.1. The code of professional ethics are a set of principles that guide the behaviour of people in a business context. They are essential to maintaining the legality of business and a healthy workplace.

4.2. The SAM code of ethics definition refers to the standards that apply to a specific setting – in this case, our own organisation.

4.3. Personnel may find themselves in a situation where they're not sure how they should act.

4.4. When an employee behaves, or intends to behave, in a way that's against SAM professional ethics, or applicable laws, SAM will take action on which disciplinary procedures will be considered.

4.5. For these reasons, SAM personnel must read this document carefully and consult with the manager or HR, if they have doubts or questions.

4.6. The components of the SAM code of professional ethics:

- 4.6.1. SAM base our business code of ethics on common principles of ethics established norms and international obligations such as:
 - 4.6.1.1. ICoCA.
 - 4.6.1.2. The Montreux document.
 - 4.6.1.3. The United Nations Guiding Principles on Business and Human Rights
- 4.7. SAM will always respect Human Rights and prohibits the following:
 - 4.7.1. Torture or other cruel, inhuman, or degrading treatment or punishment
 - 4.7.2. sexual exploitation and abuse or gender-based violence
 - 4.7.3. human trafficking
 - 4.7.4. slavery and forced labour
 - 4.7.5. the use of child labour
 - 4.7.6. unlawful discrimination
 - 4.7.7. bribery, corruption and facilitation payments
 - 4.7.8. conflicts of interest
 - 4.7.9. use of illegal substances which impact on performance.
- 4.8. This is underpinned by:
 - 4.8.1. Respect for others.
 - 4.8.2. Integrity and honesty.
 - 4.8.3. Being objective and fair and not disadvantaging others.
 - 4.8.4. Knowing and following the law always.
 - 4.8.5. Competence and accountability.
 - 4.8.6. Teamwork, collaboration and not being afraid to ask for help.
- 4.9. Respect for others
 - 4.9.1. It's mandatory to respect everyone. SAM personnel must be professional, polite and understanding. They must respect others' personal space, opinions and privacy. Any kind of violence is strictly prohibited and will result in immediate termination. Personnel also not allowed to harass or victimize others.
 - 4.9.2. If it is found that someone is committing any offence, being offensive, demeaning or threatening toward SAM personnel or someone they know, this must be reported immediately to HR.
- 4.10. Integrity and honesty
 - 4.10.1. SAM personnel will work together to achieve specific outcomes. SAM behaviours should contribute to our goals, both financial & organisational.
 - 4.10.2. Personnel must be honest and transparent and act in ways that impact other people (e.g. taking strategic decisions or deciding on layoffs).
 - 4.10.3. SAM will not tolerate malicious, deceitful or petty conduct. Lies and cheating are huge red flags and, if discovered, personnel may face progressive discipline or immediate termination.
 - 4.10.4. Stealing from the company or other people is illegal. Any actions of theft will be thoroughly investigated, and action taken.

5.0 Conflict of interest

- 5.1. Conflict of interest may occur whenever SAM personnel may have an interest in a particular subject that leads to actions, activities or relationships that undermine the

company. This includes situations like using their position of authority for their own personal gain or exploiting company resources to support a personal money-making business.

5.2. If it turns out there is a conflict of interest, staff may be terminated. If the conflict of interest was involuntary SAM will take actions to rectify the situation. Repeat offences will not be tolerated and personnel may be terminated.

5.3. Justice

5.3.1. SAM Personnel must not act in a way that exploits others, their hard work or their mistakes.

5.3.2. SAM Personnel must be objective when making decisions that can impact other people, including when deciding to hire, promote or fire someone. It must be ensured to justify any decision with written records or examples.

5.3.3. SAM Personnel must not discriminate against people with protected characteristics, as this is forbidden by.

5.3.4. When exercising authority, SAM Personnel must be fair & not display favouritism toward specific employees and exercise transparency.

5.3.5. Should SAM Personnel need to discipline an employee, they must have prepared a case that can be presented to HR.

5.3.6. Retaliation against employees or applicants (such as in cases when they've filed complaints) is forbidden by law.

5.3.7. SAM Personnel must always be just toward clients or vendors and act fairly in their dealings.

5.4. Lawfulness

5.4.1. SAM Personnel are obliged to follow all laws which apply to our organisation.

5.4.2. SAM Personnel must not expose, disclose or endanger information of clients, employees, stakeholders or our business. Always follow cybersecurity and practice OPSEC.

5.4.3. Following laws regarding fraud, bribery, corruption, and any kind of assault is a given. SAM Personnel are also obliged to follow laws on child labour and avoid doing business with unlawful organisations.

5.4.4. If SAM Personnel are not sure what the law is in a specific instance, they must ask HR for clarification.

6.0 Competence and accountability

6.1. SAM Personnel must always ensure complete professionalism.

6.2. SAM Personnel are encouraged to take up opportunities for learning and development, either on-the-job or via educational material or training. CPD is essential to professional operators.

6.3. SAM Personnel must take responsibility for their actions. Failing to be accountable on a regular basis or in important situations will result in termination.

7.0 Teamwork

7.1. Working well with others is a virtue, rather than an obligation. SAM Personnel must be ready to collaborate with and help others.



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- 7.2. SAM Personnel must share their expertise and knowledge, be open to learning and evolving.
- 7.3. It is expected that everyone is aware of the SAM code of ethics and personnel must be ready to intervene when any breach of this policy may be identified.