

	Fearless Security Services FSS	Code of Business Ethics Conduct Policy		
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		Standard 18788: Operation Establishing the Norms of Behavior and Codes of Ethical Conduct: 8.2		

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Scope

The Scope of this document is to be adhered to by all internal staff and personnel from the Board of Directors to the Cleaners. All external Staff that deliver service to our company suppliers and consultants. Throughout this Code, each reference to 'Staff' refers to everyone including the Board of Directors, employees, contractors, certain consultants, agents, subcontractors, vendors/suppliers, and other entities that do business with our company.

Responsibilities

On joining your company all Staff are required to read and understand the Code in its entirety. For purposes of this Policy, reference to 'Your company Policies' includes any approved project or department-level directives, procedures or guidance. Unfamiliarity with or a lack of understanding of the Code or our company Policies, or failure to stay informed of the current contents of the Code or your company Policies should not excuse Staff from a violation.

It is important that all staff and those subcontracted to work on our behalf understand that:

- No-one in our company has the authority or right to order, request or influence you to violate this Code.
- They will not be excused for violating this Code for any reason, even at the request of another person, including your supervisor.
- Any retaliation or threat of retaliation against any person for refusing to violate this Code or for reporting in good faith a violation or suspected violation of this Code is itself a violation and may be a breach of law.
- Any reported violation of this Code should be investigated, and every actual violation could constitute a basis for disciplinary action involving the person violating this Code up to and including termination.
- Violations could result in civil or criminal action against that person; and
- Any Staff member, who acts contrary to your Code, engages in retaliation, or who knowingly gives a false report regarding a violation of your Code, may be subject to disciplinary action, up to and including termination of employment.

Reportable incidents are defined as any adverse, confrontational or action that results in property damage, injuries, aggressive physical contact or verbal threats of bodily harm involving any of our company member of Staff or client that you are directly part of or a witness of.

OUR MISSION

To provide Gold Standard security solutions by employing 5 Core Values to assist the success of our clients' missions and in turn to provide the local community and our employees with a stable and secure future.

Our Vision

Specialises in providing Gold Standard solutions to help our clients minimise risk, maximise efficiency and grow their business to their full potential. We strive to be the best in the industry, by becoming the security provider of choice and delivering services that are second to none for our clients.

Our Guiding Principles

- Honesty
- Respect
- Transparency
- Excellence

General Policy

Our Company shall be committed to complying with the letter and of all laws, regulations, codes, and contractual obligations to which the Company is subject. All business should be conducted in a manner that evidences a strong commitment to the highest standards of ethics and integrity.

In adhering to our Code, staff must be aware of the applicable laws and regulations that apply to the Company's business affairs. Each member of staff has an obligation to familiarize themselves with the laws and regulations that are applicable to his or her job duties, and to adhere always to these requirements. Staff should remember that different locales may have different laws and regulations. When there is any question or uncertainty regarding these requirements, it should be incumbent upon each member of staff to seek guidance from supervisors or managers as required.

Ethical Decision Making

Although our company is likely to believe that our staff will be guided to the right decisions by their own personal values, discretion, and good judgment, it is not always easy to determine the ethical thing to do in a business or operational situation. All staff should consider how their behavior and actions affect the integrity, credibility, and reputation of your Company as a whole. If they encounter a situation and are not sure of the appropriate course of action, they should always discuss the issue with their supervisor or manager. When faced with an ethical dilemma, there are four basic questions that they should ask to assist in determining the correct course of action:

1. Define the problem:

What feels wrong about this situation, behavior, or action? What is the issue about which they are unsure?

2. Solution development:

What are the solutions and resources available to solve the problem? Who should be involved in addressing the situation?

3. Solution selection:

What are the potential consequences? Which solution has the maximum benefit to all parties involved and causes the least harm? Does the solution comply with all applicable laws and Company policies?

4. Implementation

How do they put the solution into action? Who should be consulted and informed of the solution?

Some other basic questions to consider asking when making ethical decisions include the following:

- Is this situation/course of action against the law or Company policies?
- How will your customers, fellow staff, or community be affected?
- Are they being honest and impartial?
- Would they be comfortable describing their decision to their colleagues, Company management, and their family?
- How would it look if it made headlines?

Reporting Violations of the Code

Staff and applicable third parties with knowledge of a violation of your Code or the laws and regulations governing your business should be expected to promptly report such violations to their manager or Supervisor. If our staff have good reason to believe or suspect that a violation of our Code or the laws and regulations governing our business has occurred, or if they are asked to violate the Code or an applicable law or regulation, they should not remain silent. They should report such violations or suspected violations as soon as possible. Depending on the circumstances, failure to promptly report may itself violate our Code. Any supervisor or other representative receiving a report concerning a known or suspected violation of an applicable law or your Code would likely be expected to promptly report the matter to higher management and take such further action as may be directed.

Accountability for Upholding the Code

Our staff are responsible for adherence to the standards of conduct set forth in your Code and for raising questions if they are concerned that these standards are not being met. If someone approaches your staff with a question or concern relating to the Code, they should listen carefully and ask for clarification and additional information to ensure that they fully understand the question or concern. They should answer any question that they can, but not feel that they must provide an immediate response. Your staff should seek help if necessary, before responding.

Statement of Conformance to ISO 18788 And PSC.1-2012

This is a requirement of the standards – you should confirm that your company is committed to providing high-quality services to your clients in a manner that complies with applicable national and international laws, and protects the safety, security, human rights, and fundamental freedoms of all internal and external stakeholders, including your company staff, your clients, third parties that act on behalf of your company, suppliers, and the local populations in areas where your company operates. Your company should have developed and implemented a set of policies, procedures, and controls that incorporates and conforms to the principles and values of applicable international humanitarian law, international human rights law, and customary international law, to ensure the company conforms to ANSI/ASIS PSC.1-2012 Management System for Quality of Private Security Operations and ISO 18788:2015 Management System for Private Security Operations. This system supports the objectives of the ***Montreux Document on Pertinent International Legal Obligations and Good Practices for States Related to Operations of Private Military and Security Companies During Armed Conflict and the International Code of Conduct for Private Security Service Providers***. With the full support of top management, your company should implement policies,

procedures, and controls that demonstrate and document your commitment to compliance with all laws and respect for human rights. Our company is requiring and expect that all staff, subcontractors, and anyone else acting on its behalf comply with all applicable human right laws and obligations, as well as other applicable laws, as set forth in your Code of Business Ethics and Conduct. Top Management shall recognise that respect for human rights is a core business value and should communicate and reinforce our SOMS throughout the company and to our relevant stakeholders.

Creating a Safe and Secure Workplace for our Company Staff

The company is committed to providing a safe and respectful work environment free from threats, violence, harassment, and discrimination. Respecting others and performing with excellence create opportunities to achieve success in your workplace.

Equal Employment Opportunity and Discrimination

Our company is committed to providing equal employment opportunities to all applicants and staff in accordance with appropriate national and host nation laws which it operates and through sound employee relations practices. The company only hires lawfully eligible workers. Each applicant and prospective employee should be considered on individual merit, without discrimination as to race, gender, age, national origin, religion, disability, sexual orientation, marital status, or veteran status.

Safety

We are committed to supporting the safety, health, and well-being of our communities, your families, and our staff. Each of you is responsible for contributing to that goal. Every employee should have a duty to comply with all health and safety rules and regulations to ensure the welfare of everyone at our company. Any violations of health and safety rules and regulations, as well as accidents and injuries, should be promptly reported to your responsible manager.

Alcohol and Controlled Substances

We are committed to providing a work environment free from illegal drugs and the influence of alcohol. Staff and other applicable third parties should be prohibited from being under the influence of alcohol, illegal drugs, or inhalants, or being intoxicated while on Company business or assignment, or while using Company-owned or provided vehicles or firearms. Additionally, staff and applicable third parties shall not be under the influence of legal drugs or inhalants prescribed by a physician if such use adversely affects our employee's safety or the safety of others.

Anti-Corruption Policy

We are committed to conducting business ethically in Iraq. It is strictly against Company policy to engage in or tolerate bribery or any other form of corruption.

Anti-Bribery

A bribe or kick-back is giving or offering to give anything of value to a foreign government official (including but not limited to staff of government-owned or controlled businesses, staff of public international organizations such as the World Health Organization, and candidates for political office) in order to obtain or retain business, or secure an improper business advantage. Your company should prohibit such payments.

Human Rights Awareness and Compliance

We will respect the dignity of all human beings and require compliance with all international and domestic laws and other obligations regarding human rights. Staff and third parties that act on behalf of the company will follow and comply with applicable laws and Company policies, procedures, and controls at all times. Failure to follow these laws and obligations could result in termination of employment, criminal prosecution, fines, and imprisonment. In addition, as a private company employing private citizens to work in hostile areas that often have a large military presence, the company and its staff are considered Non-Combatants under the Law of War. Your company staff should never take actions that would result in their being considered Unlawful Combatants by virtue of direct participation in an armed conflict or armed hostilities. Such participation could result in an individual being charged with criminal acts or war crimes.

Rules for the Use of Force

Due to the unique nature of the security services that our company provides, staff mainly work in high-risk environments, which necessitate the carriage of firearms. When staff are armed, they should only carry firearms legally under all relevant licensing requirements and exclusively for personal protection, the protection of those in their care, or the protection of the innocent. Your staff should adhere to all Rules for the Use of Force (“RUF”) standards, as specified in relevant contracts. Military Rules of Engagement are NOT to be used for use of force decisions. When no contrary or inconsistent RUF are specified by government contracts, the following could apply: Staff should take all reasonable steps to avoid the use of force. If force is used, it should be in a manner consistent with applicable laws and regulations. If the use of force is required, it should be proportionate to the threat, appropriate to the situation, and limited to what is strictly necessary. Firearms should only be used in self-defence or the defence of others against imminent threat of death or serious injury, or to prevent the perpetration of a particularly serious crime involving grave threat to life. The use of force or firearms should comply with all national and international obligations applicable to regular law enforcement officials and, at a minimum, with the standards expressed in the United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials (1990).

Management of Firearms

When a contract requires our company staff to carry firearms, you will acquire and maintain authorizations required by applicable law for the possession and use of any firearms and ammunition. Your company staff are prohibited from purchasing, possessing, using, or selling privately owned firearms, ammunition, or explosives in the area of operation. No firearms, munitions, or military equipment obtained or acquired by any means other than official issue by your company should be retained for personal use or shipped out of the area of operation for personal retention or control. Staff will not possess nor use firearms or ammunition that are illegal under any applicable law. Staff should not engage in any illegal firearms transfers and should conduct any firearms transactions in accordance with applicable laws and United Nations Security Council requirements, including sanctions. Firearms and ammunition should not be altered in any way that contravenes applicable national or international law. Staff who are to carry firearms will be granted authorization to do so on completion or verification of appropriate training regarding the type and model of firearm to be carried. Your company Staff should not carry a firearm until they have successfully completed firearm-specific training. Staff carrying firearms will receive regular, verifiable, and recurrent training specific to the firearms that they carry and Rules for Use of Force (RUF). This training may be based on a variety of relevant standards, but should be based, at a minimum, on the principles contained in the *International Code of Conduct for Private Security Service Providers* (2010), the *United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials* (1990), and national laws or regulations in effect in the area where duties will be performed.

Apprehending Persons

Staff will not take, hold, detain, or apprehend any persons, except when necessary to defend themselves or others against an imminent threat of violence or following an attack or crime committed by such persons against Company staff, clients, or property under the Company's protection, pending the handover of such apprehended persons to the competent authority at the earliest opportunity. Any apprehension should be consistent with applicable national or international law and should be reported to your client without delay. All apprehended persons should be treated humanely, consistent with their status and protections under applicable human rights law and international humanitarian law. Company staff should not engage in torture or other cruel, inhuman, or degrading treatment or punishment.

Dissemination and Review of our Company's Code of Business Ethics and Conduct

The company will distribute the Code to all its staff and staff of its affiliates and applicable third parties. This distribution should be supplemented with appropriate training on ethics and compliance. New staff will receive a copy of the Code during their orientation and will be required to familiarize themselves with it. Agents, representatives, and consultants working for, or on behalf of, your company will be bound by the Code. Each individual or entity receiving our Code will be responsible for reading and understanding its contents; any questions or clarifications should be addressed to managers, supervisors, or your General Counsel or her or his designee. Each individual or entity will be responsible for affirming compliance with the Code by signing the Attestation or Certification of Compliance with the Code of Business Ethics and Conduct, an example of which is attached at the end of this document. The Code is a statement of the Company's ongoing commitment to ethical behaviour, and the company may make periodic changes to your Code, as requirements dictate. Staff should be responsible for complying with all such changes.

ANNEX A: Attestation

EMPLOYEE'S (AND PROSPECTIVE EMPLOYEE'S) ATTESTATION OF COMPLIANCE WITH THE CODE OF BUSINESS ETHICS AND CONDUCT

As set forth in its Code of Business Ethics and Conduct, Fearless is committed to the highest standards of integrity, ethical behaviour, and compliance with all applicable laws. As a member of staff (or prospective member of staff) of Fearless, I support these objectives and affirm the following:

I have read and understand the Code of Business Ethics and Conduct, including the Statement of Conformance to the ISO 18788 and PSC.1 Standard. I understand that the Code sets forth the minimum standards of conduct with which I must comply.

I am always personally responsible for complying with all sections of the Code of Business Ethics and Conduct and acting ethically and with integrity.

I will be held accountable for my actions, and any violations of the Code of Business Ethics and Conduct may result in disciplinary action, up to and including termination.

It is my duty and responsibility to report any known or reasonably suspected violations of the Code of Business Ethics and Conduct or company policies. I may report such violations to my manager or supervisor, I may do so anonymously.

It is my responsibility to understand the Code of Business Ethics and Conduct, and I should direct any questions to my manager or the General Counsel or her or his designee.

I also attest that nothing in my past or present conduct contradicts Fearless Code of Business Ethics and Conduct, Statement of Conformance, or adherence to the clauses of ISO 18788 and PSC.1 Standards.

Signature



Date 1/8/2023

Print Name
Asaad Abdul Hameed

Title and Company Name :
CEO-Fearless for Security Services