



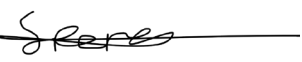
CODE OF CONDUCT AND BUSINESS ETHICS

P-COR-005

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Document Approval

Date	Names	Position	Signature
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Our Way of Doing Business

Any Code of Conduct dictates how personnel must work. The aims of this Code are to set out specific principles in compliance with the International Code of Conduct for Private Security Providers, allowing the operation of the company and any associated companies, to bear scrutiny at an international level. It is expected that adherence to this Code will allow personnel to operate in a humane way within local, national and international laws and promote the business ideals of the company.

Night Bird Security is committed to the highest standards of social and business practices. The delivery of success to our shareholder's results from the efforts of our people - it is their resourcefulness, professionalism and dedication that gives Night Bird Security its competitive edge as one of the forerunners in security and risk management industry in territories of Iraq.

To this end, top management and employees are expected to observe the highest standards of integrity in the conduct of Night Bird Security business, furthermore, in respect to Human Rights at all times. The Owner and CEO has approved this Code of Conduct and Business Ethics to provide a framework within which all business practices involving Night Bird Security and any persons or business acting on behalf of or providing a service to, must be conducted, managed and regulated.

This Code has been compiled in accordance with the common values shared by all involved in the business of Night Bird Security, the general principles of law and internationally accepted ways of doing business ethically and in accordance with its policies. In addition, comprehensive systems of control have been introduced to ensure that in attaining the objectives of Night Bird Security, we behave legally, ethically, appropriately and sustainably.



Shawn Perez
Executive
Manager

January 2025

1. Night Bird Mission Statement

To provide a safe and secure working environment for its personnel and clients, achieved through the recruitment of experienced contractors, procurement of quality equipment and commitment to continual improvement whilst respecting Human Rights at all times.

2. Night Bird Commitment to our Employees and our Environment

2.1. Human Rights

Night Bird Security is aware of violations of fundamental human rights in certain parts of the world, including the right to life, the freedom of conscience, religion and association. Whilst it is accepted that Night Bird Security cannot independently change this reality, we nonetheless support the protection of human life and dignity within our sphere of local cultural knowledge and influence by subscribing to the principles laid down in the Universal Declaration of Human Rights. Night Bird Security confirms its commitment thereto by complying with any sanctions or internationally agreed boycotts imposed by the United Nations and European Commission.

Night Bird Security concedes that it may be obliged to employ armed security guards to protect its business and/or client activities and assets, and its employees working in those operations, but does so in accordance within host country laws of Iraq.

Furthermore, Night Bird is committed to respecting the United Nation's (UN) convention on Human Rights and the International Labour Organisation's (ILO) eight core conventions on fundamental human rights, which are: non-discrimination, forced labour, child labour, freedom of association and collective bargaining, harassment, working hours, benefits and wages, leave and employee contracts and letters.

2.2. Equal Opportunities

Night Bird strongly believes that all employees should have equal opportunities of employment, fair rewards for commitment, career progression based on ability and performance and also necessary qualifications and conduct, our commitment to this is shown through a performance bonus scheme which is fully implemented.

Night Bird highly values the knowledge and diversity which employing people from different backgrounds and geographical locations brings to the business and it is this diversity of knowledge and experience that aides the business communicating with its vast international client base that along with our local cultural knowledge due to being an Iraqi owned company creates the perfect synergy between local cultural knowledge and ability to engage with the communities and its extensive international employee base to provide a high standard of service to its clients.

Night Bird also has the ability to train internally its personnel and certify them to expected industry standards and invests heavily on this to ensure its employees have the path and opportunities to progress within the company, which enhances their capability and knowledge and promotes our commitment to providing Night Bird employees equal opportunities.

2.3. Health and Safety

Night Bird Security is committed to treating all employees fairly, with respect and dignity and in order to honour this commitment, Night Bird Security shall:

- Create and maintain a safe and healthy workplace through the design of the work environment, the planning and performance of work, the provision and use of all necessary equipment, tools and procedures, the appropriate training and the constant identification and elimination of risks present in the workplace; and
- Take appropriate measures to ensure that employees refrain from using any drug or alcohol in the work environment which could affect such an employees work performance and thereby posing a risk to the health and safety of other employees.

2.3.1. The Workplace

Night Bird Security shall:

Reward employees fairly based on their qualifications and performance without discrimination on the basis of age, colour, creed, disability, ethnic origin, gender, marital or family status, religion or sexual orientation. In addition, all promotions and recognition will be based purely on merit;

- Provide all employees with equal opportunities to training and skills development;
- Respect the privacy of all employees and safeguard the confidentiality of employee information; and
- not tolerate behaviour which is tantamount to any form of harassment in the workplace and shall foster work environments that are free from harassment, intimidation and hostility of any kind.

2.3.2. The Environment

Night Bird Security acknowledges that its activities have a profound effect on the environment. To manage its obligations, Night Bird Security undertakes to:

- Understand the environmental impact of our activities and treat it as an integral factor in all decisions;

- Make the principles of sustainable development a fundamental part of Night Bird Security business strategies and day-to-day operations;
- Implement and maintain comprehensive environmental policies so that our actions are carried out in an environmentally responsible way;

2.4. Bullying, Harassment, Discrimination and Misconduct

Night Bird has a zero tolerance policy against abuse, bullying and harassment of any kind and expects its employees to respect this policy and each other at all times. Inappropriate sexual advances or reference and/or unwelcome physical contact is completely unacceptable in Night Bird.

Night Bird does not tolerate any discrimination based upon religion, gender, age, ethnicity, nationality, disability, sexual orientation, social origins and associations with all recruitment and promotional decisions based purely on performance, merit and qualifications necessary only.

Employees will not work under the influence of drugs or alcohol as it could lead to a health and safety risk and affect the employee's ability to perform the work. Employees found to be under the influence of any substances, drugs or alcohol whilst on duty or 12 hours' prior will face disciplinary actions, including dismissal.

2.5. Social Responsibility

Night Bird Security primary purpose is to deliver a return to shareholders over the long term. However, this implies that our business model must be sustainable and it is therefore a basic requirement that we conduct our business in a socially responsible manner. Night Bird Security is committed to continuously striving to improve the quality of life and contributing to the well-being of communities in which we conduct our business and whilst this support will take different forms in different countries and communities, Night Bird Security shall make every effort to:

- Support health, education and environmental initiatives;
- Support and work with voluntary and charitable organisations that respond to community needs;
- Become involved in and with the community to solve community problems;
- Encourage all employees to volunteer for community projects and support them in doing so;
- Encourage, support and seek partnerships with organisations which need Night Bird Security assistance whether they be schools or social service organisations;
- Involve local communities in decision making issues that affect them;
- Give preference to business partners who conduct their business in accordance with

- ethical standards consistent with its own; and
- Draw from the local labour pool to the extent possible.

2.6. Night Bird Expects You To

- Treat your colleagues as you would want to be treated yourself, with respect, dignity and courtesy.
- Work safely and report unsafe practices.
- Never work under the influence of any illegal substances, alcohol or drugs.
- Respect the environment you are operating in and treat the local communities with respect.
- Report any seen breaches of this policy to your line manager or use the email provided if you wish to remain anonymous – shawnbdm@nb-security.com
- Alternatively, ceo@nb-security.com

3. Night Bird Commitment to Integrity

3.1. Integrity

Personnel will be required to uphold the corporate integrity of their employer. The Code of Conduct will be observed at all times and the ethics and relevant training and skills will be utilized effectively in supporting the work of the company. Personnel will maintain a responsibility to the company and preserve its integrity through observing the following responsibilities:

- Personnel will not engage in, benefit from, or enable competitors or other inappropriate persons, to acquire confidential information about the company or its personnel.
- Personnel will avoid potential conflicts of interest which could impair their performance for the company. These include (but are not restricted to): business dealings, investments, family relationships, outside employments, improper personal benefits, gratuities and inappropriate relationships with clients, suppliers, or competitors.
- Personnel will not accept or offer gifts, gratuities, kick-backs or bribes to persons or organizations seeking to engage in business with the company.
- Personnel will consult with management in the event of an action arising which is not clearly defined above, but which may be construed as a bribe, gratuity or solicitation of same.
- Personnel will take reasonable steps to protect Night Bird Security and/ or clients of Night Bird Security's property, equipment, materials, resources, documentation and business assets.

- Personnel will adhere to relevant confidentiality agreements and will accept that any confidential information will remain confidential even after the end of employment and cannot be shared with persons outside the company.
- Personnel will take reasonable steps to protect confidential information relating to business practices and developments, including (but not limited to), trademarks and copyright, intellectual property rights, and computer systems, communication resources and other technological developments.
- Personnel will not use business or confidential information to buy or sell securities. Insider trading is strictly prohibited.
- Personnel will not engage with or benefit from the media, whether print, broadcast or online. Press enquiries must always be directed to the most appropriate person.

3.2. Conflicts of Interest

Conflicts of interest are situations where employees may make decisions based on personal gain rather than the best interests of Night Bird Security. Further, even though an employee may not allow personal interests to influence their decision-making, the appearance of conflict will jeopardise the trust of Night Bird Security stakeholders should they perceive that decisions are made not solely with Night Bird Security best interest in mind. Our policies governing the conflict of interests set forth the guidelines and procedures to be followed by all employed by Night Bird Security in their dealings with fellow employees, suppliers, customers and competitors, and any persons or business concerns which are affected by any of the operations or activities of Night Bird Security, such as:

3.2.1. Outside Business Interests Night Bird Security employees shall not:

- Operate in any capacity, serve as directors or work as employees or consultants for any competitor or any current or potential business partner;
- Use the resources of Night Bird Security to run private businesses or conduct work for another organisation;
- Confer any benefit, monetary or otherwise on a business partner or competitor of Night Bird Security in which such employee or a family member in his or her personal capacity, holds a beneficial interest; or
- Take personally yourself, your family or personal associates, directly or indirectly benefit from opportunities that may arise through the use of Night Bird Security intellectual property, information or position.

3.2.2. Gifts, Entertainment, Travel, Hand-outs, Offerings

- Where anything is offered to an employee and/or a member of an employees' immediate family for less than market value, the guidelines in determining a conflict

of interest would be:

- The value or frequency of the offer made is excessive having regard to internationally prevailing business standards;
- Should the receipt of such offering become a matter of public attention, the acceptance of such offering would jeopardise the trust that any stakeholder may have in Night Bird or may have the potential to negatively affect Night Bird Security reputation; and
- Is the offering of a nature that Night Bird Security would, in all probability, not reciprocate.

In instances where it appears to be inappropriate to accept the item, an employee is advised: -

- To tactfully refuse the offering; or
- In exceptional circumstances, if to refuse such offering would reasonably cause embarrassment or hurt to the person making the offering, the employee may accept the offering on behalf of Night Bird Security and then advise the Night Bird Security Directors of its receipt, so that an appropriate course of action may be determined transparent about and accountable for our environmental performance;
 - Refrain from doing business with third parties who do not conduct their business in an environmentally responsible manner; and
 - Require all our business partners to have appropriate systems to safely handle hazardous materials.

3.2.3. Involvement with Suppliers, Customers.

Employees (and/or any member of his or her immediate family), should refrain from being associated with a supplier, contractor, customer, competitor, joint venture partner, service provider or other entity involved in business dealings with Night Bird Security. Examples of inappropriate involvement include:

- The acquisition of non-trivial interest in a business entity that deals with Night Bird Security;
- Holding a partnership interest or having a profit-sharing or incentive arrangement, creditor - debtor relationship or similar economic involvement with any business entity that deals with Night Bird Security;
- Serving in any capacity in a business entity that deals with Night Bird Security; or
- Acceptance of a loan, advance or other non-monetary benefit from a supplier, contractor, customer or other business entity, except for customary loans or advances from banks or other lending institutions.

3.2.4. Use of Confidential or Proprietary Information.

Employees and/or members of an employee's immediate family should avoid activities, which involve the use or misuse and/or the disclosure of confidential or proprietary information of or concerning Night Bird Security or other companies gained by virtue of their employment, including more specifically the following:

- Buying or selling securities of Night Bird Security or another company when in possession of price sensitive information relating to that entity whether favorable or unfavorable;
- Disclosure of any information not already in the public domain relating to Night Bird Security or another company except to persons who are authorised to receive such information and where such disclosure is in the course of an employee's normal duties and responsibilities as part of his or her employment;
- Recommending or expressing an opinion as to the buying, selling or holding of securities of Night Bird Security or another company;
- Speculating in securities of Night Bird Security or another company or in options to buy or sell such securities or other similar financial instruments relating to any such securities or selling any such securities short or generally trading in such securities for short-term profit.

3.2.5. Non-Solicitation

Night Bird Security does not approve of the making of any payment in any kind (gifts, favours, etc) to influence any act or decision relating to Night Bird Security business. No employee of Night Bird Security is to make, offer, promise or authorise an unlawful or improper payment of any kind, whilst knowing that such payment is intended as a bribe, payoff or rebate in an attempt to coerce any individual into awarding business opportunities to Night Bird Security. Employees are warned that such conduct could have serious consequences for Night Bird Security and the employee concerned. Night Bird Security views on non-solicitation should be clearly communicated to all parties that conduct business with Night Bird Security.

3.2.6. Personal Use of Company Information and Business Opportunities

Employee and/or members of an employee's immediate family shall not use the employee's position with Night Bird Security for any personal gain or for the benefit of any third party, such as:

- Any personal exploitation of information to which an employee has access by reason of his or her employment with Night Bird Security;
- Personal use of any "business opportunity" in which Night Bird Security is or may be interested;
- Speculation in ores, metals or other products of a type produced or traded by Night Bird Security where such speculation involves the use of such information to which

the employee as access by reason of his or her employment with Night Bird Security.

3.2.7. Political, Charitable and other Public Activities and Business Affiliations

In general, we would not expect that a conflict of interest will arise from a director or employee's affiliation with outside professional, political, civic or charitable organisations or (subject to written approval by Night Bird Security in advance) from directorships or trusteeships of non-competing business entities who do not trade with Night Bird Security. Any request for such approval should be submitted in writing to Night Bird Security Directors. An employee should disclose to the Night Bird Security Directors any such activities where the employee has reason to believe that an invitation to serve in any such organisation was offered primarily because of the person's employment with Night Bird Security or where there is an implication of Night Bird Security interest or responsibility.

In order to avoid such an inference, unless approved by the Night Bird Security Directors, in writing, an employee shall refrain from using Night Bird Security or its premises for charitable, political or other purposes outside the employee's normal duties and responsibilities.

3.2.8. Interaction with the Press and Media

Night Bird Security name shall not be used without prior written approval in any published article or as part of an employee's public appearance in the media. To fulfill this commitment of being fair and honest to all of Night Bird Security business partners, all employees shall endeavor to:

- Treat them courteously, respectfully and in a professional manner;
- Commit only to what we as employees of Night Bird Security honestly believe Night Bird Security is able to deliver within the parameters of this Code of Business Ethics and honor the commitments made;
- Protect all information shared with Night Bird Security on a confidential basis by any of our business partners;
- Desist from attempting to improperly influence the decisions of existing or potential business partners by e.g.- offering gifts, if this Code would prohibit an employee of Night Bird Security from accepting the same if roles were reversed; and
- Select our suppliers objectively based on the long term best interests of Night Bird Security.
- An employee's duty to avoid a conflict of interests is a continuing obligation situation that might, or may appear to constitute a potential conflict of interests to the Company Directors.

4. Adherence to the Law

All employees shall act in accordance with the Law of the jurisdictions in which Night Bird Security conducts its business. It is recognised that employees in some territories in Iraq may be subjected to local pressures to engage in unlawful conduct. However, as representatives of Night Bird Security, employees owe their duties to the Company and are reminded that the interests of Night Bird Security will be best served if such pressures are resisted.

If you find yourself in this situation, your best course of action is to tell your line manager or their manager of your concerns.

4.1. Rules for the Use of Force

When employees are armed, they will only carry firearms legally under all relevant licensing requirements and exclusively for personal protection, the protection of those in their care.

Employees shall take all reasonable steps to avoid the use of force. If force is used, it shall be in a manner consistent with applicable laws and regulations. If the use of force is required, it shall be proportionate to the threat, appropriate to the situation, and limited to what is strictly necessary.

Lethal force shall only be used in self-defence or the defence of clients against imminent threat of death or serious injury, or to prevent the perpetration of a particularly serious crime involving grave threat to your or your client's life.

4.2. Detention and Apprehension of Persons

Persons may be apprehended when personnel are acting in self-defence, defence of clients following an imminent threat of violence, attack or crime. These persons must be handed over to an appropriate authority at the earliest opportunity and in the interim, be treated humanely within applicable law. If a person is required to be detained by personnel for any length of time, they will be treated in compliance with human rights laws and prohibitions on torture, cruel or degrading treatment or forms of punishment will be observed at all times.

4.3. Prohibited Actions

All personnel adhering to this Code will accept the prohibition of the following actions in compliance with international law and the ethics upon which this Code is founded.

The following prohibitions must be strictly adhered to and include (but are not limited to):
Personnel will not:

- Engage in torture, punishment, cruel or degrading treatment of persons. Nor will these actions be enabled or supported by personnel, even in the event of imminent armed conflict, threats to national or international security, or any other extraordinary circumstance. The torture or inhumane treatment of persons by another person will be reported to the company immediately.
- Engage in or benefit from the sexual exploitation of persons. Violent sexual crime, prostitution, rape and sexual harassment within the company or externally are strictly prohibited. Incidents of this nature must be reported immediately to the relevant authorities.
- Engage or benefit from the use of labour provided by force, slaves or children. Personnel will not allow associated contractors, groups or employees whether paid or voluntary to engage in these kinds of labour.
- Engage or benefit from human trafficking of adults or children. Personnel will not support or enable the trafficking of humans for labour, prostitution or any other cause.
- Discriminate against any persons on grounds of race, colour, sex, religion, disability or sexual orientation. The company will also adhere to this principle when recruiting personnel, within the requirements of the position available.
- The above actions are strict prohibitions and contravention of any of these may result in the termination of employment and further legal repercussions. Personnel are expected to report immediately any suspicions of incidents involving the above actions.

4.4. Relationships with the Government

Night Bird Security respects the authority of the governments in the area in which it conducts its business. It is therefore imperative that employees maintain an honest, transparent and ethical relationship with the government, their agencies, officials and personnel. Employees must ensure that when providing company information to representatives of the government, that it is accurate, comprehensive and in compliance with applicable laws and regulations relating to corporate participation in public affairs.

4.5. Weapons and Management of Weapons

- The company will acquire and maintain the relevant authorisations, licenses or other documentation required for the use and possession of weapons and ammunitions, as dictated by the applicable laws and governing bodies.
- Weapons and ammunitions will be kept in the appropriate condition and the company and its personnel (including associated personnel such as sub-contractors) will not illegally transfer, alter or use weapons or ammunition.

- The company will establish and provide policies and procedures for the storage, issue, identification, accounting and disposal of weapons and ammunitions. Records of the issue of weapons to individuals will also be stringently kept.
- The company will ensure that appropriate training, (weapon-specific where required), will be completed before personnel can be issued with a firearm with a weapons authorisation list issued and signed by top management, only employees on this list will be allowed to carry a weapon.
- This training will be recurrent, and will include weapon-specific training where required and reiteration of the rules for the use of force (RUFs).

4.6. Reporting to Competent Authorities

It is all Night Bird employee's duty to report any and all suspected or actual commission of criminal acts to the relevant and competent authorities. You can either report this through the chain of command within Night Bird and request it be reported to the relevant and competent authorities or you can personally take the information to the authorities yourself. You will be protected by the company whistleblowing policy and are fully supported in doing so by Night Bird.

5. Protection of Night Bird Assets, Confidential Information and Reputation

5.1. Protecting our Assets and Resources

The Company's resources include time, material, facilities, equipment, information, and services. These resources should only be used for authorised business purposes, unless a specific exception has been approved by management. Under no circumstances should Company resources be used for any illicit or illegal purposes or for any purpose that runs contrary to any provision of this Code.

This code extends to all third party intellectual property, resources and assets. If there is any infringement of this code with regards to third party intellectual property rights you will face disciplinary action, including dismissal.

5.2. Confidentiality

Night Bird employees are expected and required to maintain complete confidentiality of the company and the company's customer information and any personal data of colleagues.

This information includes but is not limited to:

- Any information that is not publicly available and that is used or owned by Night Bird or is a third party associated.

- Company or third party financial information.
- Information about company or third party employees.
- Information about customers, suppliers or agents.

Any distribution of this information could damage the company or third parties' reputation and affect its operation and future business. All employees are bound to protect and act in accordance with this policy and has a duty to protect its confidentiality and report any wrong doing immediately.

Night Bird takes every step to ensure third party confidentiality and seeks to protect it at all times. Any violation of this policy will result in disciplinary action, including dismissal.

5.3. Our Obligations

What is expected of you:

- You are not permitted to speak to the media, financial community or the public unless written permission is given by top management stating otherwise.
- In such cases authorization has been approved, then the information must be true, accurate and not misleading.
- You must not in any circumstances misuse somebody else's personal or confidential information including any intellectual property.
- At all times you have a duty to protect Night Bird's confidential and sensitive information, assets and resources, including all third party intellectual property rights.
- Report any breaches of this policy to your line manager or to the email provided should you wish to remain anonymous – shawnbdm@nb-security.com
- Alternatively, ceo@nb-security.com

6. Whistleblowing Policy

A whistleblower is a person who raises a concern about a wrongdoing in their workplace. If a person wishes to raise their concerns they should obtain a copy of their organisations whistleblowing policy and seek advice.

- Disclosures should be made in the public interest
- If employees cannot go to their line manager or Night Bird management with the disclosure and wish to remain anonymous, then they can send the information using the website portal at – <https://nb-security.com/> or send an email to shawnbdm@nb-security.com or ceo@nb-security.com

If employees are dismissed because of whistleblowing, they may claim unfair dismissal
If employees bring information about a wrongdoing to the attention of Night Bird or a relevant organisation, they are protected in certain circumstances under the Public Interest Disclosure

Act 1998. This is commonly referred to as 'blowing the whistle'. The law that protects whistle-blowers is for the public interest - so people can speak out if they find malpractice in an organisation. Blowing the whistle is more formally known as 'making a disclosure in the public interest'.

Qualifying disclosures are disclosures of information where the employee reasonably believes (and it is in the public interest) that one or more of the following matters is either happening, has taken place, or is likely to happen in the future.

- A criminal offence
- The breach of a legal obligation
- A miscarriage of justice
- A danger to the health and safety of any individual
- Damage to the environment
- Deliberate attempt to conceal any of the above.

If an employee is going to make a disclosure it should be made to the Night Bird first, or if they feel unable to use the organisations procedure the disclosure should be made to a prescribed person, so that employment rights are protected.

Employees who 'blow the whistle' on wrongdoing in the workplace can claim unfair dismissal if they are dismissed or victimised for doing so. An employee's dismissal (or selection for redundancy) is automatically considered 'unfair' if it is wholly or mainly for making a protected disclosure.

7. Qualifications, Employment and Training of Employees

Personnel and employees will be selected on the basis of appropriate qualifications and training, to ensure that personnel can consider themselves as providing the highest level of service, Night Bird Security will source skills and training where relevant.

Night Bird Security will provide and expect personnel to submit to physical and mental health checks to ensure fitness for duty.

In line with corporate policies, the suitability of applicants or Personnel to carry firearms will be subject to stringent inspections including (but not restricted to): authorised access to prior employment records, Government records and employment history, consistent with applicable law. Employment with Night Bird will only be offered under these strict guidelines and disqualifying elements may include (but are not limited to):

- Prior convictions.
- Dishonourable discharge.

- A documented violation of International Code of Conduct principles resulting in the termination of prior employment.
- A history of conduct that, to a reasonable person, may affect their judgment in the use of a weapon.

The company will also provide - and expect personnel to make effective use of - information and training regarding local, national and international laws, humanitarian laws and international standards of human rights. Records of training and attendance will be kept to ensure all personnel are able to work within the applicable laws.

Night Bird will expect all personnel to conduct themselves with transparency, aided by the company's Code of Conduct and Business Ethics policy.

Personnel will be expected to take responsibility for themselves and each other and, while acting in accordance with relevant SOPs and the Code of Conduct, to preserve their health and defend themselves when necessary.

Incident reports form a fundamental part of transparency and will always include: time and location of the incident, identity, contact details and nationality of persons involved, injuries or damage sustained, the sequence of events leading up to the incident and the response by personnel and subsequent measures taken by the company.

Incidents which may require a report include (but are not limited to):

- Human Rights violations.
- The firing of a weapon in any circumstances (except during training).
- Criminal acts.
- Traffic collisions.
- Attacks or threatened attacks.
- Damage to property or equipment.
- Persons injured or killed.
- Incidents involving other security forces.
- Incidents requiring an escalation of force under RUFs.

7.1. Appearance and General Conduct

Personnel will strive to ensure their appearance is professional and practical at all times when working. Operatives will accept guidance from the company on appearance and dress in accordance with the laws and climate of working locations. General conduct is expected to remain at the highest standard and persons coming into contact with personnel will receive equal humane treatment with respect for personal dignity and privacy. It is expected that personnel will familiarize themselves with appropriate local knowledge of customs and courtesy to promote good relations with local communities.

8. Statement of Conformance

Night Bird Security has developed and implemented a set of policies, procedures, and controls that incorporates and conforms to the standard, principles and values of:

- International Code of Conduct for Private Security Providers;
- Montreux Document on Pertinent International Legal Obligations and Good Practices for States related to Operations of Private Military and Security Companies during Armed Conflict;
- Guiding Principles on Business and Human Rights, Implementing the United Nations 'Protect, Respect and Remedy' Framework 2001;
- Voluntary Principles on Security and Human Rights;
- ISO 18788:2015;
- ANSI/ ASIS PSC 1. 2012.

Night Bird Security, in full support by top management is fully committed to continual improvement and regular reviewing of these standards and will implement training for its employees and others working on behalf of Night Bird to comply with these standards at all times. Furthermore, Night Bird fully expects and requires its stakeholders, suppliers and all other individual, groups or organisations associated with its operations to fully comply with these standards, principles, values and any other applicable laws stated in this code.

8.1. Statement of Applicability

The Night Bird Security operating management systems applicability and scope is the delivery and oversight of armed static and mobile security services in Southern Iraq, all territories South of Baghdad.

Night Bird excludes 8.5 section in its entirety of ISO 18788:2015 from this scope as it does not work in support of or contract with any law enforcement agencies.

9. Night Bird Commitments

9.1. Exemplary Conduct

Any Code of Conduct dictates how personnel must work. The aims of this Code are to set out specific principles in compliance with the ICoCA and Human Rights, allowing the operation of the company and any associated companies, to bear scrutiny at an international level. It is expected that adherence to this Code will allow personnel to operate in a humane way within local, national and international laws and promote the business ideals of the company.

9.2. Implementation and Monitoring

This Code will provide a framework for the use of the Security Operating Management System (SOMS). Personnel will adopt the principles within this Code with a view to using this document to inform the implementation the SOMS. Personnel will also be open to monitoring of the adherence to this Code by Company Directors and the company itself will expect transparency throughout in the case of monitoring from outside bodies with the appropriate authority.

9.3. Ethics and Security Operating Management System

Ethics and personnel adoption of ethical behaviour is fundamental to the operation of this Code. The SOMS is structured to give defined actions within a set of criteria.

This Code provides a wider framework in which to implement the SOMS, allowing personnel to incorporate an ethical solution while operating internationally. This Code requires all personnel to act within applicable law, within guidelines as laid out by the United Nations Security Council and Human Rights Declaration and to strive for full compliance with the International Code of Conduct for Private Security Providers.

10. Code of Conduct and Business Ethics Policy Summary

- Personnel will accept a responsibility to work within Health and Safety guidelines and Human Rights as laid down by the company policies. Personnel will recognise precautions that are taken to preserve life in high-risk or life-threatening situations and to accept training which will enable operatives to work as safely as possible.
- Personnel will use the training, weapons, protective equipment and direction issued by the company with a view to operating within the Code of Conduct and Health and Safety guidelines as lay out by the company.
- Will adhere to the policies implemented by the company to promote a healthy and safe working environment, psychological health among personnel and prevent misconduct and damage to the health and safety of other persons or personnel.
- The company will expect all personnel to report any incidents of harassment or abuse of co-employees. Any form of harassment within the company will not be tolerated.
- Grievances will be considered by the company via the appropriate procedures, which will be fair, effective and accessible. Appropriate records will be kept and made available to relevant authorities where, not prohibited by law. Investigations into

conduct or grievances will be made quickly and impartially with consideration for confidentiality laws and with the co-operation of outside agencies where necessary.

- The company will expect all personnel to act in an open and honest manner. To aid transparency, personnel are expected to report any suspicions of malpractice or concerns about unethical or potentially illegal behaviour to their immediate manager or to the Board of Directors. Reports of misconduct will be investigated and all personnel and associated employees (such as sub-contractors or consultants) will co-operate with any such investigation. Reports can be made anonymously and substantiated allegations will be dealt with in an appropriate manner which may include disciplinary action.
- Retaliation is prohibited for grievances or reports of misconduct. Witnesses, complainants or whistle-blowers will not suffer retaliation. Where reports are judged to have been made with malicious intent or based on false allegations, complainants may be subject to disciplinary action. The company will ensure that financial obligations can be met in the event of anticipated commercial liabilities.

10.1. Disclosure

The Senior management team is responsible for the management of Night Bird Security Code of Conduct and Business Ethics ("the Code"). Any person who becomes aware of any existing or potential violation of this Code is required to promptly notify their line manager.

11. Night Bird Input Documents to this Code

- P-COR-001 Grievance and Complaints Policy
- P-COR-002 Discipline and Conduct Policy
- P-COR-004 Anti-Bribery and Corruption Policy
- P-COR-006 Security Policy Statement
- P-COR-007 Human Rights Policy
- P-COR-008 Health and Safety Policy