



**G2S GROUP**  
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# CONFLICT OF INTEREST POLICY

## POLICY STATEMENT

**G2S-SOMS-POL-005**

Version 2.0 | Effective 23 July 2026

*Security Operations Management System (SOMS) /  
Integrated Management System*

*Conforms to ISO 18788:2015, ANSI/ASIS PSC.1-2022 and  
ISO 9001:2015*



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# DOCUMENT CONTROL

|                               |                                                                    |
|-------------------------------|--------------------------------------------------------------------|
| Document Title                | Conflict of Interest Policy                                        |
| Document Number               | G2S-SOMS-POL-005                                                   |
| Version                       | 2.0                                                                |
| Status                        | Approved                                                           |
| Effective Date                | 23 July 2026                                                       |
| Next Scheduled Review         | 23 July 2027                                                       |
| Supersedes                    | Version 1.0 (10-03-2026)                                           |
| Document Owner                | Compliance Officer                                                 |
| Approving Authority           | Chief Executive Officer and Security Manager, G2S Group            |
| Classification                | Internal                                                           |
| Applicable Management Systems | ISO 18788:2015 (SOMS) · ANSI/ASIS PSC.1-2022 · ISO 9001:2015 (QMS) |

# AMENDMENT HISTORY

| Version | Date       | Summary of Change                                                                                                                                                                                                                                                                                                | Author             | Approved By            |
|---------|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|------------------------|
| 1.0     | 10-03-2026 | Initial issue.                                                                                                                                                                                                                                                                                                   | Compliance Officer | CEO / Security Manager |
| 2.0     | 23-07-2026 | Full revision for conformance with ISO 18788:2015, ANSI/ASIS PSC.1-2022 and ISO 9001:2015: corrected footer/ document identification (previously mismatched), added RACI table, measurable KPIs, and document-control framework; retained Confidential Disclosure Questionnaire as a referenced controlled form. | Compliance Officer | CEO / Security Manager |

## DISTRIBUTION

| Distribution                                                    | Method                                                                    |
|-----------------------------------------------------------------|---------------------------------------------------------------------------|
| All employees, contractors, subcontractors and agency personnel | Induction pack; intranet; site notice boards; annual refresher training   |
| Clients and prospective clients                                 | Available on request; published on the G2S public website where indicated |
| Board of Directors and Senior Management                        | Management review pack; governance portal                                 |
| Regulators and auditors                                         | Provided on request for compliance verification                           |

## 1. PURPOSE

This Policy protects the interests of Gorgor and Goodir Security (“G2S Group”) when contemplating a new hire, a transaction, or an arrangement that might cause an officer, director, or employee to choose between personal interests and the interests of G2S, or that may call into question their independence or impartiality. This Policy ensures transparency and integrity in all decisions and actions taken by G2S personnel.

## 2. SCOPE

Applies to all employees, contractors, officers, board members, consultants, and interns operating within or on behalf of G2S Group. This Policy is intended to supplement, but not replace, applicable Somaliland Republic laws governing conflicts of interest.

## 3. KEY PRINCIPLES

- Integrity and Objectivity: all individuals must act in G2S’s best interest, avoiding activities that could impair impartial judgment.
- Disclosure and Transparency: any potential, perceived, or actual conflict must be promptly disclosed.
- Accountability: appropriate steps must be taken to manage or eliminate conflicts.

## 4. DEFINITIONS

**Conflict of interest:** a situation where personal, financial, or other external considerations may compromise, or have the appearance of compromising, professional judgment or actions.

**Key employee:** an individual with decision-making authority or influence over financial or operational matters.

**Relatives:** for purposes of this Policy, “relatives” include the spouse, parent, child, and any other relative by blood or marriage with whom a G2S officer, director, or employee has similarly close personal ties, as well as any other member of their household.

**Financial interest:** a G2S director, officer, or employee has a “financial interest” if, through business, investment, or a relative, they have an ownership or investment interest in, or a compensation arrangement with, any entity or individual with which G2S has or is contemplating a transaction or arrangement.

**Business associate:** any person or entity with which a G2S officer, director, or employee, or any of their relatives, engages in the exchange of goods or services for remuneration.

## 5. RESPONSIBILITIES

| Role                                                              | Responsibility under this Policy                                                                     |
|-------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|
| <b>All employees</b>                                              | Must disclose conflicts at the earliest opportunity and avoid actions that could present a conflict. |
| <b>Supervisors and managers</b>                                   | Ensure disclosures are escalated and appropriately addressed.                                        |
| <b>Executive management and Board</b>                             | Make final determinations and implement mitigation or resolution plans.                              |
| <b>Compliance Officer / Conflict-of-Interest Review Committee</b> | Review disclosed conflicts, assess materiality, and recommend mitigation measures.                   |

## 6. DISCLOSURE PROCEDURES

In addition to the ongoing duty to disclose:

- All directors, officers (including the Executive Director), and employees complete a Confidential Disclosure Questionnaire and an Affirmation of Compliance statement upon initiating their association with G2S.
- All directors and officers, and any employees with decision-making

authority (“key employees”), submit a new Confidential Disclosure Questionnaire and Affirmation of Compliance any time a change in circumstances may result in a potential conflict, but at least annually.

- All other G2S employees complete the Confidential Disclosure Questionnaire and Affirmation of Compliance upon hire as a one-time disclosure, and again if their circumstances change.

Board members, officers, and key employees submit their completed Questionnaire and Affirmation to the CEO; any disclosure is provided to the Board for review, which decides whether it represents an actual, perceived, or potential conflict. Other personnel submit their forms to the HR Specialist or CEO, who reviews and escalates disclosures to the CEO for a joint determination on whether Board consideration is required.

Questionnaires are treated as confidential documents. Annual disclosures are retained for three years; one-time disclosures are retained until the end of the individual’s relationship with G2S. If a potential conflict arises between submissions, it must be reported promptly: Board members and the CEO report to the Board Chair; administrative employees report to the CEO; and employees engaged in G2S activities report to their Supervisor and the General Manager.

## 7. REVIEW OF POTENTIAL CONFLICTS

### 7.1 INTERNAL REVIEW PROCESS

All disclosed conflicts are submitted to the Compliance Officer or the Conflict-of-Interest Review Committee (which may comprise representatives from Human Resources, Legal, and Operations) for evaluation of the materiality of the conflict in relation to the individual’s job function, influence, and access to sensitive information. Where the Committee cannot conclusively determine the appropriate response, the matter is referred to Executive Management or external counsel for independent review.

### 7.2 ASSESSMENT CRITERIA

- The direct or indirect impact of the interest on the employee’s ability to act objectively.
- The likelihood of bias or the appearance of compromised judgment.
- The potential for the situation to erode public, client, or partner confidence in G2S’s independence and impartiality.
- Compliance requirements arising from contractual obligations, especially with UN agencies, embassies, and NGOs.
- Risk of regulatory non-compliance or legal exposure due to

undisclosed or mismanaged conflicts.

### **7.3 DOCUMENTATION AND RECORDKEEPING**

All conflict disclosures are documented with supporting evidence and stored securely within G2S's compliance records. A Conflict-of-Interest Register is maintained and updated periodically, with access restricted to authorized personnel.

## **8. ADDRESSING CONFLICTS OF INTEREST**

### **8.1 CLASSIFICATION**

- **Actual Conflict of Interest:** the individual's judgment or actions are compromised due to a personal or financial interest.
- **Perceived Conflict of Interest:** the situation may not involve actual bias but could be perceived by clients, regulators, or the public as improper.
- **Potential Conflict of Interest:** the interest does not currently affect decision-making but could reasonably evolve into a conflict under future circumstances.

### **8.2 MITIGATION MEASURES**

- **Recusal:** the individual is excluded from participating in decisions or activities related to the conflict.
- **Reassignment:** the employee is moved to a different role or project where the conflict does not apply.
- **Divestment or Termination of Interest:** the employee relinquishes the conflicting interest.
- **Termination of Engagement:** in cases of severe or irreconcilable conflicts, G2S reserves the right to terminate the employment or contract.

### **8.3 COMMUNICATION, TRAINING, AND MONITORING**

Employees involved in a conflict-of-interest case are notified of the outcome and any required actions. G2S conducts annual training on conflict-of-interest awareness, reporting obligations, and ethical decision-making, and monitors mitigation measures through regular follow-ups, spot checks during internal audits, and review of procurement and partner-engagement decisions.

## 9. WHISTLEBLOWER PROTECTION

G2S provides secure and anonymous channels for reporting suspected or undeclared conflicts of interest, consistent with the Whistleblowing Policy (G2S-SOMS-POL-006). The Company enforces a strict anti-retaliation policy; no individual will suffer reprisal for reporting concerns in good faith, even if the issue is ultimately unfounded.

## 10. VIOLATIONS OF THIS POLICY

If a director, officer, employee, or supervisor has reason to believe that another director, officer, or employee has failed to disclose an actual or potential conflict, they must inform the Board Chair or the Executive Director, who will refer the matter to the Board. The Board will inform the person of the allegation and allow an opportunity to explain. Where the Board determines a failure to disclose has in fact occurred, it will determine corrective steps and/or disciplinary action. G2S will cooperate fully with regulatory and law-enforcement authorities and will alert the Group Risk Officer and relevant Board committee in a timely manner regarding any related regulatory enforcement action.

## 11. MEASURABLE OBJECTIVES AND MONITORING

| Objective                                                    | Measurable Target / KPI                                 | Review Frequency             |
|--------------------------------------------------------------|---------------------------------------------------------|------------------------------|
| Annual disclosure submission by key employees/officers       | 100% submitted by the annual deadline                   | Annually                     |
| Disclosed conflicts reviewed                                 | 100% reviewed within 15 working days of receipt         | Ongoing / quarterly reported |
| Undisclosed conflicts identified via internal audit sampling | 0 (zero target)                                         | Annually                     |
| Training completion                                          | 100% of directors, officers, and key employees annually | Annually                     |

## 12. RELATED DOCUMENTS

- G2S-SOMS-POL003- Code of Ethics / Code of Conduct
- G2S-SOMS-POL004- Anti-Fraud, Bribery and Corruption Policy
- G2S-SOMS-POL006- Whistleblowing Policy
- Confidential Disclosure Questionnaire and Affirmation of Compliance (Annex A)

## ANNEX A – CONFIDENTIAL DISCLOSURE QUESTIONNAIRE (SUMMARY FORM)

The full Confidential Disclosure Questionnaire and Affirmation of Compliance is maintained as a controlled form (G2S-SOMS-FRM-005-A) and issued alongside this Policy. Key questions include the following (each requires a written description on a separate sheet if answered “Yes”):

| Question (describe on a separate sheet if the answer is Yes)                                                                                                                                      | Yes                          | No                          |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-----------------------------|
| Has G2S proposed to contract, or contracted, to purchase or lease goods, services, or property from you, a relative, or a business associate?                                                     | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Are you related to any current or prospective G2S director, officer, or employee, or to the supervisor of any G2S employee?                                                                       | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Have you, a relative, or a business associate been provided with a gift, gratuity, or favour of a substantial nature from a person or entity that does business or seeks to do business with G2S? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Have you, a relative, or a business associate been gratuitously provided use of the facilities, property, or services of G2S?                                                                     | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Are you, a relative, or a business associate in a position to benefit financially from a decision, policy, transaction, or arrangement made by G2S?                                               | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Did you obtain for yourself or any other person or organization preferential treatment, promotion, recognition, or a non-salaried appointment as a consequence of your association with G2S?      | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Did you make use of confidential information obtained from G2S for your own benefit or for the benefit of any person or organization?                                                             | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Did you take advantage of an opportunity, or enable any person or organization to take advantage of an opportunity, that you had reason to believe would be of interest to G2S?                   | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Were you in a position to benefit in a non-financial way from a decision, policy, transaction, or arrangement made by G2S?                                                                        | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

Name: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## APPROVAL AND ENDORSEMENT

This document has been reviewed and approved by G2S Group leadership and is effective from the date shown below. It forms part of the G2S Security Operations Management System (SOMS) / Integrated Management System and is maintained in conformance with ISO 18788:2015, ANSI/ASIS PSC.1-2022, and ISO 9001:2015.

|                                                              |                                                                                   |                                                                                   |            |
|--------------------------------------------------------------|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|------------|
| Approved By                                                  |  |  | Date       |
| <b>Abdishakur Hassan Kayd</b><br>Security Manager, G2S Group |                                                                                   |                                                                                   | 23-07-2026 |

|                                                               |                                                                                   |                                                                                   |            |
|---------------------------------------------------------------|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|------------|
| Approved By                                                   |  |  | Date       |
| <b>Kader Abdi Daher</b><br>Chief Executive Officer, G2S Group |                                                                                   |                                                                                   | 23-07-2026 |



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