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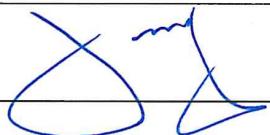
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## INTEGRATED MANAGEMENT SYSTEMS

Based on ISO 9001, ISO 45001, ISO14001, &ISO18788

### Anti-Bribery & Corruption (ABC) Policy

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	DESIGNATION	SIGN	DATE
Prepared by	Head Of Risk & Compliance		15/09/2025
Reviewed by	Chief Operating Officer		15/09/2025
Approved by	Group Chief Executive Officer		15/09/2025



**CIRCULATION**

Copy No.	Copy Holder
1.	Head Of Risk & Compliance
2.	Chief Operating Officer
3.	Group Chief Executive Officer

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**AMENDMENT SHEET**

Issue/ Revision Number	Subject of amendments	Reviewed by		Authorized by		Date
		Name	Sign	Name	Sign	
May 2024/ 00	Initial issue	-	-	-	-	May 2024
Sep 2025/001	Incorporation of ISO 18788					Sep 2025



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## OUR VISION

Our vision is to become the leading protection and security service provider in Eastern Africa. We aspire to set the industry standard for excellence, innovation, and reliability, delivering unparalleled security solutions to our clients across the region.

As the preferred choice for protection and security services, we aim to be recognized for our unwavering commitment to customer satisfaction, our uncompromising adherence to the highest professional and ethical standards, and our ability to consistently exceed expectations.

## OUR MISSION

Our mission is to become the preferred supplier of domestic, corporate, and banking security and protection solutions in Kenya. We are committed to achieving this objective by continuously investing in and developing our resources, including our people, processes, and technology.

We recognize that the security landscape is ever-evolving, and our customers' needs are diverse and dynamic. Therefore, we strive to stay at the forefront of the industry by constantly enhancing our capabilities and adapting to emerging trends and challenges.

## OUR CORE VALUES

### ❖ Focus

We prioritize our clients' security needs by creating tailor-made security solutions to ensure that their assets and personnel are protected. We are dedicated to providing unparalleled security services that meet and exceed our client's expectations.

### ❖ Accountability

We believe in taking responsibility for our actions, decisions, and results. Therefore, operating with transparency, honesty, and integrity in all our interactions with our clients, employees, and stakeholders. Our commitment to accountability ensures that our clients can trust us to always act in their best interests.

### ❖ Reliability

We are committed to delivering reliable security services to our clients. Our experienced and trained security personnel are equipped with the latest technology and techniques to provide comprehensive security solutions that meet and exceed our client's expectations.

### ❖ Growth

We are committed to growing our business by continually improving our security services and expanding our reach. We embrace innovation and adapt to new challenges to achieve our mission and stay ahead of our competitors.

### ❖ Organized

We are a well-organized security company that utilizes a structured approach to manage our clients' security needs. We ensure that our personnel, technology, and processes are coordinated and aligned to deliver the best possible security services to our clients.



## ANTI-CORRUPTION & ANTI-BRIBERY POLICY

### Introduction

Wells Fargo Limited is committed to conducting its business with the highest ethical standards and in compliance with all applicable laws and regulations, including those related to anti-corruption. The following policy outlines the principles and guidelines that all employees, contractors, and partners of Wells Fargo must adhere to in order to prevent corruption in any form.

**Anti-Corruption Policy Statement** Wells Fargo prohibits any form of corruption, including bribery, kickbacks, extortion, and other unethical practices. All individuals associated with Wells Fargo are expected to conduct themselves ethically and with integrity in all business dealings.

### Compliance with Laws and Regulations

All employees must comply with the Ethics and Anti-Corruption Act and other relevant anti-corruption laws in every jurisdiction where Wells Fargo operates. Failure to comply with these laws may result in severe consequences, including legal action and termination of employment.

### Gifts, Entertainment, and Hospitality

Employees must not offer, give, or receive gifts, entertainment, or hospitality that could be perceived as intended to improperly influence business decisions. Any gifts or entertainment given or received must be reasonable, transparent, and compliant with company policies.

### Due Diligence on Third Parties

Before engaging third parties such as vendors, suppliers, agents, or consultants, employees must conduct thorough due diligence to ensure that these parties do not engage in corrupt practices. Contracts with third parties should include anti-corruption clauses.

### Reporting Violations

Employees who suspect or witness any form of corruption within Wells Fargo or involving its partners must report it immediately through the appropriate channels provided by the company. Reports can be made anonymously without fear of retaliation.

### Reporting Procedure

- a) Any individual who becomes aware of any illegal, corrupt, unethical, or improper conduct within Wells Fargo Limited is encouraged to report it promptly. Reports should be made to [integrity@fargo.co.ke](mailto:integrity@fargo.co.ke)
- b) Reports should be made in writing and should include as much detail as possible, including the nature of the concern, relevant dates, names of individuals involved, and any supporting evidence.
- c) Requests from government officials or other third parties to make or accept any form of corrupt payment must be immediately reported to the email or otherwise in accordance with the Company's Whistleblower Policy.
- d) Reports can also be made anonymously through [integrity@fargo.co.ke](mailto:integrity@fargo.co.ke). Anonymous reports will be treated with utmost confidentiality.

### Protection for Whistleblowers

- a) Wells Fargo Limited is committed to protecting the identity of whistleblowers. All reports will be handled confidentially, and the identity of the whistleblower will be disclosed only on a need-to-know basis or as required by law.



- b) Wells Fargo Limited will not tolerate any form of retaliation against whistleblowers. Any employee found to have retaliated against a whistleblower will be subject to disciplinary action, up to and including termination of employment.

#### **Investigation and Response**

- a) All reports will be promptly investigated by special operations department. The investigation will be conducted impartially, thoroughly, and with due regard for the rights of all parties involved.
- b) Upon completion of the investigation, appropriate action will be taken to address the reported concern. This may include disciplinary action against individuals found to have engaged in illegal, unethical, or improper conduct.

#### **Confidentiality**

Confidentiality will be maintained throughout the investigation process to the extent possible, consistent with the need to conduct a thorough and effective investigation.

Information related to whistleblower reports will only be disclosed on a need-to-know basis or as required by law.

#### **False Reporting**

Making false or malicious reports under this policy is strictly prohibited and may result in disciplinary action, up to and including termination of employment.

#### **Compliance with Laws**

This policy designed to comply with all relevant laws and regulations in Kenya, including but not limited to whistleblower protection laws as may be amended from time to time.

#### **Non-Retaliation Statement**

Wells Fargo Limited prohibits retaliation against any individual who, in good faith, reports suspected or actual misconduct. Retaliation against whistleblowers is a violation of company policy and will not be tolerated.

Wells Fargo Limited is committed to maintaining a culture of integrity, transparency, and accountability, and encourages all individuals associated with the organization to speak up if they become aware of any behaviour that contradicts these principles.

#### **Training and Awareness**

Wells Fargo will provide regular training sessions on anti-corruption and bribery policies and procedures to ensure that all employees understand their responsibilities in preventing corruption. Awareness campaigns will also be conducted to promote a culture of integrity within the organization.

#### **Monitoring and Enforcement**

The Compliance Department at Wells Fargo will monitor compliance with this anti-corruption policy regularly. Non-compliance will be subject to disciplinary action, up to and including termination of employment.

#### **Review and Updates**

This policy will be reviewed periodically to ensure its effectiveness and relevance in preventing corruption within Wells Fargo. Updates will be made as necessary based on changes in laws or regulations related to anti-corruption.

By adhering to this policy, Wells Fargo reaffirms its commitment to ethical business practices and maintaining the trust of its customers, shareholders, and stakeholders.