ANTI-BRIBERY & ANTI-CORRUPTION POLICY

September 2026

INTRODUCTION AND PURPOSE

This policy commits the Precision Technic Defence Group (PTD Group) to conducting business ethically and with the utmost integrity in all its operations throughout the world. The policy requires compliance with all applicable laws and regulations on bribery and corruption, including, but not limited to, the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act 2010 (UKBA), Directive (EU) 2026/1021 on Combating Corruption and its implementing legislation in each EU Member State in which the Group operates, and other applicable national anti-bribery statutes and implementing rules and regulations.

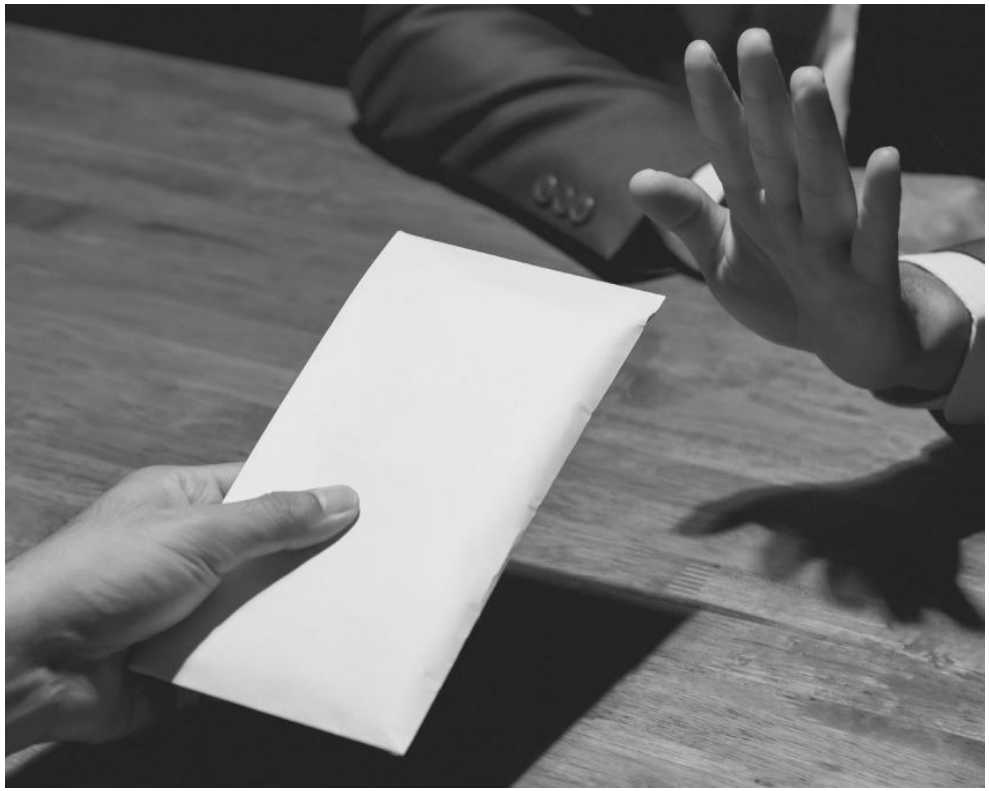
The purpose of the policy is to outline and explain the prohibitions against bribery and corruption in all of the PTD Group's operations, to highlight the specific compliance requirements relating to these prohibitions, and to reinforce the Group's commitment to conducting business globally with the highest level of honesty and integrity.

Violating applicable anti-corruption laws potentially exposes the Group, its employees, and any third-party intermediaries (regardless of nationality or location of residence) to significant criminal and civil liability, fines, and penalties. Notwithstanding the above, the rationale for this policy is not just legal compliance:

- Corruption is a major obstacle to poverty reduction and, by endorsing this policy, PTD Group reiterates its strong commitment to adhering to the relevant standards set out in the United Nations Convention Against Corruption.
- The PTD Group must not authorize or tolerate any business practice that does not comply with this policy.

SCOPE

This policy applies globally to the management, employees, and contract workers of all entities in Precision Technic Defence Group. Where the Group participates in existing joint ventures as a non-controlling shareholder, the other shareholder(s) shall be made specifically aware of the significance to the Corporation of the policy and shall be encouraged to apply the same policy or a similar standard to the joint venture. For contemplated new minority joint venture cooperations, Precision Technic Defence Group shall strive to commit the other shareholder(s) to adopt the policy or a similar standard for the joint venture.



REQUIREMENTS

Prohibited and Restricted Payments

Offering, promising, and authorizing the giving of money, or anything else of value, to a government official to secure an improper advantage is strictly prohibited.

No employee may offer, give, promise, or receive money, or anything else of value, to or from an individual or entity in the private sector to obtain an improper advantage.

Even the mere act of offering is prohibited, regardless of whether the item of value is accepted by the intended recipient.

The prohibition covers cash payments, benefits, and favors. In certain circumstances, it also covers otherwise legitimate business expenditures such as gifts, entertainment, travel, donations, sponsorships, or training.

The above-mentioned payments are prohibited regardless of whether they are made directly or indirectly through third party intermediaries.

Permissible Payments

This policy permits employees to provide modest gifts, hospitality or certain other things of value to government officials and private individuals that are legal and directly related to the promotion or demonstration of the PTD Group's services or the performance of a particular Group contract with a government or state-owned or state-operated entity.

When deciding whether a gift is appropriate, employees must consider any past, pending or future business or administrative matters that are within the recipient's realm of influence. The timing and context of such gifting must be considered to assess whether any particular gifting could objectively be perceived as bribery.

Detailed information on the circumstances under which certain things of value may be provided can be found in the Gifts, Entertainment & Donations Guidelines.

Travel, Education Related Expenses Involving Government Officials

The Precision Technic Defence Group may accept requests to host government officials for training or other business-related purposes either at the Group's facilities or at training events sponsored by outside vendors. The Group may also accept requests to host government officials at operational meetings, project meetings or other events.

The payment of travel expenses to any government official, within or outside their home country, requires the prior written consent of the management to ensure consistency with this policy and any applicable laws of the official's country.

As a rule PTD Group does not cover any travel cost except for own employees.

CONFLICTS OF INTEREST

Employees, managers and board members must avoid situations in which their personal, financial or family interests could conflict, or appear to conflict, with the interests of the PTD Group.

Any employee who is aware of a potential conflict of interest, including a financial interest in, or a family or close personal relationship with, a supplier, agent, competitor, customer or government official must disclose this promptly to their manager and, where the conflict relates to a business decision, must not take part in that decision.

Disclosed conflicts of interest must be logged and reviewed by Management on at least an annual basis.

CHARITABLE DONATIONS AND SPONSORSHIPS

The PTD Group supports the making of contributions to the communities in which it does business and permits reasonable donations to charities and sponsorships.

The main objective of the Corporation is to support active and veteran Service members from Police and Armed Forces. In this respect:

- Reasonable steps must be taken to verify that any such contribution does not constitute illegal payment to a government body or official or any individual in violation of this policy.
- It may be permissible to make donations directly to a government agency (rather than to an individual government official) as part of a charitable effort or to promote goodwill through actions such as providing free products for a government-sponsored celebration.
- All donations must adhere strictly to the requirements set out in the Gifts, Entertainment & Donations Guidelines and may not be used to improperly influence business decisions.

Political Contributions

The PTD Group does not make contributions, whether in cash or in kind, to political parties, political candidates or political campaigns in any jurisdiction, except where such contributions are expressly permitted by local law and have been approved in writing in advance by the Group CEO.

Sponsorships or donations must never be used, or be capable of being perceived as being used, as an indirect means of making a political contribution.

Third Parties

The PTD Group can be held liable for the actions of third parties, particularly where a third-party intermediary performs services or otherwise conducts dealings, discussions, or negotiations with public or private organizations for or on behalf of the PTD Group.

The PTD Group may be held responsible for the actions of third parties in, for example, giving or accepting bribes.

The PTD Group may also be held accountable for failing to take sufficient steps to prevent third parties from participating in bribery or related conduct, whether the Group was actually aware of the alleged improper conduct.

Third parties must never be asked to engage in or condone any conduct that employees are prohibited from engaging in themselves under this policy.

Also, an employee must never turn a blind eye to suspected violations of this policy by third parties or disregard otherwise suspect circumstances.

All third parties conducting business with, for or on behalf of the PTD Group are required to act with the highest level of business, professional and legal integrity.

The PTD Group must never enter any relationship with a third-party intermediary who will have substantive interaction with government officials on behalf of the PTD Group without first inquiring into the third party's background, qualifications, and reputation.

The most important steps the PTD Group can take to protect itself from liability for improper payments made by a third party are to carefully choose its business partners including agents and consultants, and to be aware of "red flags". Any employee seeking to establish a business relationship between the PTD Group and a third party must, prior to engaging with the third party, carefully review and follow the due diligence process as per the PTD Group Authorized Dealer or Partner Application.

Due diligence on third-party intermediaries shall be risk-based and proportionate, considering factors such as the country and sector of operation, the nature of the intermediary's interaction with government officials, and the compensation structure

proposed. Intermediaries operating in higher-risk jurisdictions or sectors require enhanced due diligence and Management approval before onboarding, and due diligence records must be refreshed periodically for the duration of the relationship.

Facilitating Payment

The PTD Group does not allow the use of facilitating payments. Such payments may be considered a customary way of doing business in some countries, but it is important to understand that the anti-bribery laws of many countries prohibit such payments.

Employees and third parties, in particular third-party intermediaries, are prohibited from making facilitating payments on the PTD Group's behalf.

Under exceptional circumstances, i.e. when an employee's safety is at risk, a facilitating payment may be permissible.

When a payment has been made, an incident report must be submitted to the Group Management Level immediately.

BOOKS, RECORDS, ACCOUNTING, AND PAYMENT PRACTICES

In order to prevent the possibility of bribes and kickbacks being paid or accepted, all PTD Group business and financial records must fairly and accurately reflect each transaction involving PTD Group business and/or the deployment of company assets.

Secret, unrecorded, or unreported transactions are prohibited.

All expenses must be accurately accounted for, include appropriate supporting documentation, and be promptly entered into company records before they are reimbursed.

The requirement is not limited to the accurate identification (in expense reports, related business, and financial records) of all payments to third-party intermediaries acting for or on behalf of the PTD Group.

DISCIPLINE

The PTD Group and its employees can be investigated by government regulators in different jurisdictions and, depending on the circumstances, prosecuted administratively, under civil law or under criminal law, which could result in severe fines and penalties, debarment and imprisonment if a violation of applicable anti-bribery and anti-corruption laws and regulations is established.

Any employee found to be in violation of this policy will be subject to disciplinary action, up to and including termination of employment, in accordance with applicable laws and company policies.

Distributors, suppliers, agents, consultants and other third parties working for the PTD Group who are found to be in violation of this policy will be subject to termination of the business relationship as well as any other legal and remedial actions available to the PTD Group under applicable law.

REPORTING BREACHES OR CONCERNS

It is the responsibility of all employees to ensure compliance with this policy. Any employee who witnesses a breach of this policy is obliged to promptly contact Group Management.

Any employee who is in doubt suspects that this policy has been breached or has concerns about past or proposed actions by anyone in the PTD Group, or any third party working with the PTD Group in any capacity, is encouraged to contact Group Management.

ROLES AND RESPONSIBILITIES

Body/Function/Individuals	Roles and responsibilities
Group CEO	Responsible for policy approval
Executive Management	Policy owner with overall responsibility to Group CEO for corruption issues in the Precision Technic Defence Group, as described in this policy, and for ensuring that material corruption risks in the Group are duly attended to and communicated to the Group CEO. Responsible for periodically assessing the effectiveness of this policy, the related manuals and screening procedures, and for reporting findings to Group CEO and the Chairman of the Board. Responsible for (supporting) the implementation of the policy in the organization via communication & training.
Managing Directors	Responsible for ensuring that this policy is implemented and adhered to, and that all employees, third parties and business partners are made aware of the policy and its requirements. Responsible for annual sign-off on compliance with the policy. Responsible for conducting regular risk assessments. Responsible for carrying out training, monitoring and other activities to assist in ensuring compliance with the policy.
Management, consultants, and employees	Responsible for adhering to this policy.

GLOSSARY

Bribery

Anything of value given in an attempt to affect a person's actions or decisions in order to gain or retain a business advantage.

Corruption

The misuse of public office or power for private gain or the misuse of private power in relation to business outside the realm of government.

Facilitating payment

Any small or nominal payment made to a government official, typically to speed up and/or secure the performance of a non-discretionary "routine governmental action". Activities that constitute "routine governmental actions" are for example: obtaining permits, licenses or other official documents to qualify a person or entity to do business in a foreign country; processing governmental papers, such as visas and work orders; providing police protection, mail pick-up and delivery, or scheduling inspections; providing telephone services, power and water, loading cargo or protecting goods from deterioration. Facilitating payments are different from express payments, used to speed up a process. Express payments are legitimate payments, for which one can receive an invoice or receipt so that the transaction can be duly registered in our books.

Government official

Any officer or employee of a local, state, regional or national government or any department, agency or ministry of a government; individuals who, although temporarily or without payment, hold a public position, employment or function; employees of a public international organization; the individuals acting in an official capacity for or on behalf of a government agency, department, ministry or public international organization; political party officials or any candidate for political office; employees of a state-owned or state-controlled entity, as well as entities or individuals that perform a government or public function (such as airports or seaports, utilities, notaries, arbiters etc); members of a royal family (note that such individuals may lack formal authority but may otherwise be influential in advancing the PTD´s business interests either through partial ownership or management of state-owned or state-controlled companies).

Family members of any of the individuals listed above may also qualify as government officials if interactions with them are intended to confer, or have the effect of conferring, anything of value on a government official. Any questions relating to whether an individual or an entity constitutes a "government official" must be directed to the local compliance representative.

Improper advantage

Paying or giving anything of value directly or indirectly in order to: influence or prevent a government action, or any other action, such as the awarding of a contract, the imposition of a tax or fine, or the cancellation of an existing contract or contractual obligation; obtain a license, permit or other authorization from a government entity or government official to which the PTD Group is not otherwise entitled; obtain confidential information about business opportunities, bids or the activities of competitors; influence the awarding of a contract; influence the termination of a contract that is disadvantageous to the PTD Group, influencing the adjudication of lawsuits and enforcement actions and obtaining exceptions to regulations.

Kickback

The return of a sum already paid or due as a reward for awarding further business.

Third party intermediary

Any individual or entity engaged (formally or informally) by the Company to act for or on behalf of the PTD Group, regardless of the name or title of the individual or entity. This definition includes, but is not limited to, any individual or entity used:

- to obtain and/or retain business, such as agents, advisors, consultants, subcontractors, sales representatives, and joint venture partners
- to secure a license, visa, permit or other form of authorization from, or intervene in a regulatory matter with, a government official
- to represent the PTD Group or its interests vis-à-vis a government entity or state-controlled company
- to represent the Group in tax or legal matters, or a customs clearance process
- to provide products or services directly to the PTD Group.

DEVIATIONS

No exemptions from this policy can be granted unless there are exceptional circumstances. All requests for exemptions must be made in writing to the Group CEO. The Group CEO must assess and decide on each request individually. Exemptions must be duly logged and documented.

POLICY REVISION

This policy must be reviewed and approved by Group CEO at least every two years. It may be amended at any time with the approval of Group CEO. In the event of any discrepancies between the English version of this policy and a translated version, the English version will be binding.

Mr. Thorbjørn Machholm
CEO, Precision Technic Defence Group

Thorbjørn Machholm

September 2026