

Geopolitical Intelligence (Pty) Ltd

Version 1.0 | Effective: May 2026 | Approved by: Lunga Dweba, Director

Information You Can Defend.

1 . P U R P O S E

This policy sets out the position of Geopolitical Intelligence (Pty) Ltd, trading as GI, on bribery and corruption. It applies to all personnel acting on behalf of the firm, including the Director, contractors, and any person engaged to perform work under a GI mandate.

The GI practice operates in environments where integrity and credibility are the foundation of every client relationship. The firm has a zero-tolerance position on bribery and corruption in any form.

2 . L E G I S L A T I V E F R A M E W O R K

This policy is anchored in the Prevention and Combating of Corrupt Activities Act 12 of 2004 (PRECCA), which places a legal duty on persons in positions of authority to report corrupt transactions to the South African Police Service. Compliance with this duty is not discretionary.

This policy is also read in conjunction with the following:

- Public Finance Management Act 1 of 1999, where applicable to public sector mandates
- Financial Intelligence Centre Act 38 of 2001 (FICA)
- Companies Act 71 of 2008
- GI Standard Matter Confirmation (GI-SMC)

3 . S C O P E

This policy applies to:

- The Director of Geopolitical Intelligence (Pty) Ltd.
- All persons engaged under contract or subcontract to perform work on behalf of GI.
- All mandates, whether public or private sector, in South Africa or anywhere in the world.

This policy applies at all stages of a mandate, from initial engagement through to delivery and post-delivery conduct.

4 . P R O H I B I T E D C O N D U C T

The following are strictly prohibited:

- Offering, promising, giving, or authorising a bribe to any person, whether a public official or a private party.
- Requesting, agreeing to receive, or accepting a bribe in any form.
- Making facilitation payments of any kind, regardless of amount or purpose.
- Using a third party as a channel for a bribe that GI would not make directly.
- Engaging in any conduct that constitutes corruption as defined under PRECCA.

5. GIFTS AND HOSPITALITY

GI prohibits the giving and receiving of gifts, hospitality, entertainment, and any other benefit in connection with its work. This prohibition is absolute and applies regardless of value, occasion, or intent.

The nature of GI's work, which includes investigations, due diligence, open source intelligence analysis, and expert testimony, requires that no actual or perceived conflict of interest arises from any exchange of benefit. There are no exceptions to this prohibition.

Any person who receives an unsolicited gift or benefit in connection with a GI's mandate must declare it to the Director immediately and return or decline it.

6. CONFLICTS OF INTEREST

All persons acting on behalf of GI must declare any actual or potential conflict of interest to the Director before work on a mandate commences. A conflict of interest includes any personal, financial, or professional relationship with a subject, counterparty, or stakeholder that could compromise the independence or objectivity of the work.

Where a conflict is declared, the Director will determine whether the person may continue on the mandate, be recused, or whether the mandate must be declined.

7. REPORTING SUSPECTED BRIBERY OR CORRUPTION

Any person who becomes aware of conduct that may constitute bribery or corruption in connection with a GI mandate must report it to the Director without delay.

Reports must be made in writing and will be treated with confidentiality to the extent permitted by law. No person who makes a report in good faith will face adverse consequences as a result of that report.

Where the suspected conduct involves the Director, the matter must be reported directly to the South African Police Service in accordance with the duty imposed by section 34 of PRECCA.

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8. RECORD - KEEPING AND MONITORING

The GI practice maintains written records of all mandates, including signed Standard Matter Confirmations for the investigative support service, scope agreements, and deliverables. These records serve as the basis for demonstrating compliance with this policy and with applicable law.

This policy will be reviewed annually by the Director or following any material change in the firm's operations or applicable legislation.

9 . C O N S E Q U E N C E S O F N O N - C O M P L I A N C E

Any breach of this policy will be treated as a serious matter. Consequences may include immediate termination of the mandate or contract, civil or criminal liability under PRECCA and applicable law, and referral to relevant regulatory authorities including PSIRA.

GI reserves the right to report suspected criminal conduct to the appropriate authorities regardless of whether the person responsible is internal or external to the firm.

1 0 . P O L I C Y O W N E R S H I P

This policy is owned and administered by the Director of Geopolitical Intelligence (Pty) Ltd. It is published on the GI website and forms part of the firm's standard governance documentation.

GEOPOLITICAL
INTELLIGENCE (PTY) LTD
PSIRA 326 9716



Lunga Dweba

Director, Geopolitical Intelligence (Pty) Ltd | May 2026