



ANTI-FRAUD COMPLIANCE PROGRAM

Prime Armor is committed to the **highest standards of ethical conduct and integrity in all aspects of its operations. This anti-fraud compliance program outlines the company's commitment to preventing, detecting and responding to fraud, as well as fostering a culture of transparency and accountability.**

1. Commitment to an ethical culture

Prime Armor is committed to maintaining a culture of ethical behavior and has a zero-tolerance policy towards fraud.

2. Compliance Manager

The company has appointed a compliance officer to oversee the anti-fraud compliance program and report directly to senior management or the board of directors.

3. Risk assessment

Regular fraud risk assessments, specific to the vehicle armor sector and company operations, will be conducted. Vulnerable areas will be identified and prioritized for mitigation measures.

4. Written policies and procedures

The Company will maintain clear and comprehensive anti-fraud policies and procedures.

These documents will be easily accessible to all employees.

5. Training and education

Relevant employees and third-party partners will receive training on anti-fraud policies and procedures. Ongoing training and awareness programs will be conducted.

6. Reporting mechanism





A confidential and anonymous reporting system will be in place to allow employees and stakeholders to report fraud issues. Whistleblowers will be protected.

7. Investigation and response

A defined process for investigating reported fraud incidents will be established. Disciplinary measures and legal measures will be described.

8. Due diligence in business dealings

The Company will implement a due diligence process to select and monitor suppliers, subcontractors and other business partners to prevent the risk of fraud.

9. Monitoring and auditing

Regular internal audits will be conducted to assess compliance with anti-fraud policies. Consideration will be given to recruiting external auditors for independent evaluations.

10. Compliance with laws and regulations

The Company will remain informed of relevant local and international anti-fraud laws and regulations. Practices will comply with legal requirements.

11. Fraud Risk Mitigation

Specific controls to mitigate identified fraud risks will be developed. Regular reviews and adjustments of controls will be made as necessary.

12. Continuous improvement

A mechanism for continuous evaluation and improvement of the anti-fraud compliance program will be established. The program will adapt to changing business conditions and fraud risks.





13. Documentation and record keeping

Detailed records of all compliance activities, including training, investigations and reporting, will be maintained.

14. Reports to the board of directors and senior management

Periodic reports on program effectiveness and detected fraud incidents will be provided to the Board of Directors and senior management.

15. Communication and awareness

Regular communication with employees and stakeholders on the importance of anti-fraud measures and the company's commitment to ethical conduct will be maintained.

16. Enforcement measures and disciplinary measures

The consequences of violating anti-fraud policies will be clearly defined. Application will be consistent and fair.

17. Assessment and certification

Consideration will be given to obtaining third-party certification or external review of the anti-fraud compliance program.

18. Legal and regulatory liaison

The company will maintain liaison with relevant law enforcement and regulatory agencies.

19. Crisis management plan

A response plan to a major fraud incident, including communication with stakeholders and the public, will be developed.

20. Monitoring and correction





After a fraud incident, appropriate remedial and remedial actions will be taken to prevent future incidents.

Prime Armor reaffirms its unwavering commitment to **integrity, transparency, and accountability** in all business operations. Through this Anti-Fraud Compliance Program, we ensure that ethical conduct remains the foundation of our company's reputation and continued success.

We stand firm against fraud in all its forms and we are committed to protecting our people, our partners, and the trust placed in us.

We thank you for your compliance.

From all of us at Prime.

