

Our **Innovation**
Your **Intelligence**

Anti-Bribery and Corruption Policy

Version 4

4 September 2025

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GEOTERRA
IMAGE

POLICY NAME	Anti-Bribery and Corruption Policy		
DOCUMENT ID	GO-6		
EFFECTIVE DATE	04 September 2025	DATE OF LAST REVISION	03 September 2025
ADMINISTRATOR RESPONSIBLE	Elsa Van Zyl	CONTACT INFORMATION	Elsa.vanzyl@geoterraimage.com
Applicable To:	Employees and Management, Third Parties and Contractors, Partners and Affiliates		

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR
V1	Directors	23 January 2024	New	Alet Henning
V2	Directors	6 June 2024	Company information update	Alet Henning
V3	Directors	21 August 2025	Align Company information	Alet Henning
V4	Dr. Corné Elof	4 September 2025	Align with ISO9001 Policy Structure	Elsa Van Zyl

APPROVAL AND REVIEW
The GEOTERRAIMAGE Anti-Bribery and Corruption Policy is reviewed annually (or sooner if required) by our Operations Manager and formally approved by Executive Management. This process ensures that the policy remains current, effective, and backed by top-level commitment to security and compliance.

<p>GeoTerralmage Group of companies: GeoTerra Image (Pty) Ltd, GeoTerralmage Holdings (Pty)LTD, GeoTerralmage SA (Pty) Ltd (GTI-SA), GeoTerralmage Education NPC, and, in addition, as its European incorporated company GEOTIPT INTERNATIONAL, UNIPESSOAL LDA (GeoTerra360).</p> <p><i>Hereafter referred to as "The Group"</i></p> <p><i>"The Group" is a well-regarded organisation, recognised for its strong commitment to regulatory compliance. It has earned a reputable standing among clients and competitors alike by consistently conducting its business in line with high moral, ethical, and legal standards. "The Group" remains firmly committed to ethical and transparent business practices, actively upholding this commitment through the implementation and enforcement of comprehensive corporate governance frameworks, internal controls, and codes of conduct that guide all employees and stakeholders in their professional responsibilities.</i></p>

PURPOSE
The purpose of this Policy is to set out GEOTERRAIMAGE 's commitment to preventing bribery, corruption, and fraud in all forms. It provides a clear framework for ethical business conduct in line with applicable laws, regulations, and best practices. This Policy also affirms GEOTERRAIMAGE 's moral and legal responsibility to combat bribery and corruption, and establishes the tools, controls, and methods required to monitor, detect, and address such practices effectively.

SCOPE

This Policy outlines GeoTerra Image's moral and legal responsibility to prevent and combat bribery and corruption. It sets out the tools, controls, and procedures required to effectively monitor, detect, and respond to such practices.

This Anti-Bribery and Corruption Policy prohibits offering, promising, or providing any form of bribe or corrupt inducement to any stakeholder or customers, government officials, business partners, or third parties, with the intent of securing an improper advantage in relation to our business.

This Policy applies to all individuals and entities associated with **GEOTERRAIMAGE**, including but not limited to:

- All employees, whether permanent, temporary, fixed-term, part-time, or interns.
- Senior management, executives, and members of the Board of Directors
- Contractors, consultants, agents, and representatives acting on behalf of **GEOTERRAIMAGE**
- Vendors, suppliers, service providers, and collaboration partners, subsidiaries, affiliates, and any group entities under **GEOTERRAIMAGE**'s control, regardless of their location.

All parties are required to comply with the **GEOTERRAIMAGE** Anti-Bribery and Corruption Policy. No person acting on behalf of the Company may engage in, facilitate, or condone any form of bribery, corrupt conduct, or fraud. Non-compliance may result in disciplinary action, termination of contracts, and/or legal consequences.

GEOTERRAIMAGE has zero tolerance for bribery, corruption, and fraudulent activities. We are committed to conducting business professionally, fairly, and with integrity in all dealings and relationships, both inside and outside the organisation.

GEOTERRAIMAGE is committed to upholding all applicable laws and regulations relating to anti-bribery and anti-corruption and will continually reinforce these standards through monitoring, training, and compliance measures.

DEFINITIONS

1. **BRIBERY:**
Offering, giving, receiving, or soliciting of anything of value (such as money, gifts, loans, rewards, favours, commissions, or entertainment) as an improper inducement or reward to secure business, employment, or any other benefit. It includes gifts and excessive or inappropriate entertainment, hospitality, travel and accommodation expenses, payments and or favours, whether by employees or business partners such as recruiters, labour service providers or consultants.
2. **CORRUPTION**
Abuse of entrusted power for personal or business gain
3. **FRAUD**
Wrongful or criminal deception intended to secure unfair or unlawful gain

POLICY STATEMENT

GEOTERRAIMAGE is a reputable organisation, recognised for its strong compliance practices. It has earned its reputation among competitors, clients, and stakeholders through a consistent commitment to conducting business in accordance with moral, ethical, and legal standards.

GEOTERRAIMAGE group of companies is committed to conducting its business ethically and honestly by implementing and enforcing systems that prevent all forms of bribery, corruption, and fraud. This commitment applies across all operations and to all employees, directors, officers, contractors, business partners, and third parties acting on behalf of **GEOTERRAIMAGE**.

Bribery and corruption in any form are strictly prohibited. This includes offering, promising, soliciting, or accepting anything of value—whether monetary or non-monetary—for the purpose of improperly influencing business decisions, securing an unfair advantage, or undermining the integrity of **GEOTERRAIMAGE**.

This Policy aims to ensure that **GEOTERRAIMAGE**:

- Uphold the highest standards of integrity and transparency in all business dealings
- Ensure compliance with applicable anti-bribery, anti-corruption, and fraud-prevention legislation
- Establish and maintain effective controls and procedures to detect, monitor, and address potential violations
- Foster a culture of accountability, ethical conduct, and zero tolerance for corrupt practices

GEOTERRAIMAGE's leadership is fully committed to enforcing this Policy and will provide the necessary resources, training, and oversight to ensure its effective implementation. **GEOTERRAIMAGE** will continually uphold all applicable laws and regulations relating to anti-bribery and corruption. Any breach of this Policy will be regarded as a serious matter and may result in disciplinary action, up to and including dismissal, termination of contracts, and reporting to the relevant authorities.

IMPLEMENTATION AND CONTROLS

The Company's strategy and policy include clear processes for managing and communicating expectations to its workforce, contractors, employees, and third parties. Communication and awareness of this Policy form part of the induction for all new employees, contractors, and relevant stakeholders.

The Board of Directors is committed to addressing and eliminating any form of inappropriate conduct. Such behaviour, whether from employees, managers, customers, or clients, will not be tolerated in any form.

This Policy binds **GEOTERRAIMAGE** to its commitment to regularly review, discuss, and mitigate risks associated with bribery, corruption, or fraudulent activity. To ensure compliance, **GEOTERRAIMAGE** may conduct periodic audits. All directors, officers, employees, and stakeholders are required to cooperate fully with the audit process.

Furthermore, all directors, officers, employees, and stakeholders are obligated to report any suspected or actual violation of this Policy directly to the Board of Directors. Failure to report such incidents will be treated as a breach of this Policy and may result in disciplinary action.

APPLICABLE LAWS

1a. South African Laws

This Policy is governed by the anti-corruption and anti-bribery laws of South Africa's principal anti-corruption statute, the Prevention and Combating of Corrupt Activities Act, 2004 ("PRECCA"), which applies to both natural and juristic persons. On conviction, a contravention of PRECCA can result in a fine of unlimited value.

1b. International and Foreign Applicable Laws

Examples of international frameworks, which are ratified by respective member states, include:

<https://www.icaew.com/technical/trust-and-ethics/economic-crime/bribery-and-corruption/international-and-foreign-law-on-bribery-and-corruption>

OECD Convention on Combating Bribery of Foreign Public Officials (1997)
 [This makes it a crime for companies and individuals to pay bribes to foreign public officials.]

UN Convention against Corruption (2003). [This addresses bribery both at home and abroad and includes private sector corruption.]

ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITY
OPERATIONS MANAGER	Maintain, Update, Circulate policy and Implement Policy
LINE MANAGERS	Ensure implementation of this Policy and report concerns.
EMPLOYEES AND CONTRACTORS	Comply fully with this Policy and disclose any suspected danger or wrongdoing.
BOARD OF DIRECTORS	Monitor the effectiveness and review the implementation of this policy, considering its suitability, adequacy, and effectiveness.

RESPONSIBILITY & AUTHORITY

This Policy applies to all **GEOTERRAIMAGE** employees. This policy does not form part of any employee's contract of employment, and it may be amended at any time.

APPROVAL SIGNATURES

TITLE	NAME	EMAIL
CEO	Corné Eloff	corne.eloff@geoterraimage.com
SIGNATURE		