

Corporate Compliance, Governance & Framework



SOLUZIONI TERRESTRI, AEREE E MARITTIME

Corporate Compliance, Governance & Framework

Confidential

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Purpose

The Board of Directors (the “Board”) of STAM Strategic & Partners Group Ltd (the “Company”) has adopted these Corporate Governance Guidelines (the “Guidelines”), which reflect the Board's commitment to monitor the effectiveness of policy and decision-making both at the Board and management level, with a view to enhancing value over the long term. These Guidelines should be considered to be an evolving set of corporate governance principles, subject to alteration as circumstances warrant. These Guidelines are not intended to change or interpret any federal or state law, rules and regulations or the Company's certificate of incorporation or bylaws.

STAM Strategic & Partners Group Ltd is a PMS’C (Private Military & Security Company) registered in the United Kingdom. STAM is registered and performs its activities in accordance with the legal regulations of the United Kingdom as well as International regulations which define and regulate security matters on an international level.

1 Policy

STAM Strategic & Partners Group Ltd will not become involved with:

- Embargoed regimes
- Terrorist organizations
- Drug cartels and international organized crime
- Illegal arms trading
- Nuclear, biological or chemical proliferation
- Contravention of human rights
- Any activity which breaches the basic Law of Armed Conflict.
- Any group or activity that potentially violates the ethics of its partners or ethos.

STAM Strategic & Partners Group Ltd acts in compliance with all the regulatory requirements of the countries where we operate, while providing a service of superior quality and quality. Our operations are structured and conducted in accordance with:

- ISO 9001:2015.
- ISO 28007-1:2015.
- ISO 27001.
- ISO 31000.
- ISO 18788.
- OHSAS 18007.
- 2001 Private Security Act.
- 2002 FCO Green Paper.
- UK Bribery Acts.
- US Foreign & Corrupt Practices Act.
- DoD instruction (DoDI) 5240/06 reference (a) in accordance with the authority in DoD directive (DoDD) 5143.01 (Reference (b)).
- UN Voluntary Principles on Security and Human Rights.
- Montreux Document On Pertinent International Legal Obligations and Good Practices for States Related to Operations of Private Military and Security Companies During Armed Conflict.
- Guiding Principles on Business and Human Rights; Implementing the United Nations 'Respect, Protect and Remedy' Framework 2011.
- PSC-1 International Code of Conduct Association (ICoCA) principle.
- United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials.
- Additionally, the Company participates in the UN Global Compact and adheres to the Voluntary Principles for Security and Human Rights.
- Voluntary Principles on Security and Human Rights.
- United Nations Guiding Principles on Business and Human Rights.
- EU General Data Protection Regulation.
- Corporate Social Responsibility and investment
- Transparency and accountability, including financial and contractual compliance
- Adherence to local laws and national sovereignty
- Government consultation and cooperation
- Tribal, religious and cultural awareness and respect
- Environmental protection
- Health and Safety at work
- Professional excellence
- Confidentiality

2 Privacy Policy

To complain to our Supervising Authority, the UK's independent authority on information rights the Information Commissioner's Office (ICO) <https://ico.org.uk/>

STAM Strategic & Partners Group Ltd strongly believes that the company's behavior should promote the Rule of Law, respect for Human Rights and protect the interest of its Clients. Our working methodology is structured around a set of policies and a management tool that helps our employees ensure that the services are rendered as per standards presented to the Clients and in compliance with the Laws and standards we abide to.

3 Framework

STAM Strategic & Partners Group Ltd is composed of:

- **GS Intelligencelab Consulting Ltd**

(Defense activities)

- **Amoruso & Partners Ltd**

(Justice and judicial activities)

- **ProximalIntell Ltd**

(Training and Intelligence activities with GS Intelligencelab Consulting Ltd)

The management team is led by the Chief Operating Officer (CEO), Chief Operating Officer (COO) with each director leading the respective management. The directions will consist of Business Management, Information and Intelligence Management, Training, Logistics and Business Development. All directors report directly to the CEO and COO.

- **The Business Management Division** is responsible for Business Administration, Human Resources, Accounting, Legal, Investor Relations, Public Relations, Security Clearance Processing, and Travel.

- **The Information and Intelligence Management Division** is responsible for information and intelligence support for all operations and related supporting activities with intelligence production; oversight and dissemination and information management activities; development of assessment and analysis management tools; creation, development, staffing and implementation of the Strategic Operations Center; and conducting threat assessments, risk analysis and mitigation planning as contracted with the client.

- **The Training Division** is responsible for the conceptual and technical design support of the Training Center; development and approval of programs of instruction, lesson plans and training schedules; Course and Instructor certification; conducting training and course reviews; Student certification and credentialing; and coordination with Business Development for projected contract and client support.

- **The Logistics Division** has responsibility for the procurement process, material management and accountability of all items required to support administration, business development, information management, operations, training, logistics, and communications. This Division also is responsible for all facility maintenance and scheduling, as well as the required licensing to support sensitive materials requisitions and foreign import and export activities.

- **The Business Development Division** has responsibility for the creation, management and implementation of the Company's Marketing and Sales Plans. The Business Development Team responds to all approved RFP's through the coordinated effort of the Proposal Team in addition to establishing and sustaining a rapport and network with the various governments, non-government organizations, multinational corporations and private company's contracting officers and business development staffs.

- **The Quality Protection Division** aim to ensure that the company operations is fit for purpose, is consistent and meets both external and internal requirements. This includes legal compliance and owners expectations. The sections role is concerned with monitoring and advising on the performance of the quality management system, producing data and reporting on performance, measuring against set standards.

4 Business Concept

STAM Strategic & Partners Group Ltd aspires to be the leading, global provider of full-spectrum integrated risk mitigation solutions to multinational corporations, governments, non-governmental organizations (NGOs), private corporations and individuals. STAM will provide each of its clients with a high-level menu of security services to include: Security Consultancy, Security Operations and Project Support, Systems Design and Integration, and security related Training. Recent events in the world have demonstrated the significant dependence that the United States and other western governments have placed upon private security companies (PSCs) and private military companies (PMCs) to support and sustain activities in regions plagued with war, insurgency and natural devastation. Military forces are over-stressed, under-trained, and under-strength. Missions that were traditionally the exclusive responsibility of the military have now been delegated to PSCs/PMCs to fill. The sometimes criminal behavior and inadequate control and oversight of PSCs/PMCs operating in hostile environments have resulted in congressional hearings and cries for better regulation and enforcement. Many PSCs have come under close scrutiny for the highly questionable actions of their personnel. These companies currently have over a billion dollars in contracts with the U.S. government and are being requested by host nations to be expelled. This creates a tremendous opportunity for STAM to enter the market with a better service product than has been available thus far to support reconstruction efforts in Iraq and Afghanistan and in any other region of the world where competent security professionals are needed. The role of the PSC/PMC may change and evolve but it is here to stay for the foreseeable future. How it changes and the direction it moves in will be entirely dependent upon the industry itself and what actions it takes to comply with the laws, regulations, cultures and traditions of the world.

5 The Best of Two Cultures

STAM Strategic & Partners Group Ltd was founded by a changing business environment of STAM Soluzioni Terrestri Aeree Marittime Srl, an Italian company born in 2010 from the initiative of a large industrial group that accepted the challenge to provide innovative technological solutions and services related to security & defence. After five years of operations in the Italian market and small experiences overseas by STAM Malta Ltd which dealt with maritime security and anti-piracy operations, STAM Srl staff has decided to transfer its operations abroad, creating STAM & Strategic Partners Group Ltd in the UK. We are dynamic and able to offer the global market a new way of understanding and managing security, with innovative and effective solutions. STAM Strategic & Partners Group Ltd is the only PMS'C that integrates the "Italian Communications Model" and the & UK/USA Tactical Model, combining the best of two cultures.

6 The Best of Two Cultures

Nowadays' organizations are going through a big change in their ways of operate, think and function. This change is being pushed by the principal transformations that the anthropic risks are having. Security as well has been hit by the constant transformation of risks and menaces.

More than the changing itself, the impact on Security is due to the speed of the developments in which the menace evolves, and it achieves, a lot of times, the avoiding of the most articulate counter actions. Anthropic menaces are the most difficult to eliminate completely and they are inevitable. Organizations not only can be attacked by exogenous action but also by endogenous ones. Because of this, 360° security in all its sectors is climbing the agenda of almost all board of directors and top notch manager are trying to find the right solutions to reduce the risks and mitigate their impact in some sort of way. The rising of menaces more strong and diffused, which can vary from the terrorism to the cyber security, demands that leaders must be prepared. The ecosystem in which the new threats have been evolving offers a humongous power to the terrorism and criminals and makes security more than just a simple technical problem. In fact, security becomes an issue for corporates, business security and the stability of democracy.

Leader, politicians, shear holders and customers demand the highest level of the security protocols. The balance of all the needs with the necessity of profiting after an investment presents an enigma for the implementation of the security inside companies and all kinds of governments. The potential consequences of a realized menace are huge and have made security one of the most important topics inside the most important decision rooms.

STAM STRATEGIC & PARTNERS GROUP LTD knows that in order to make security reliable, corporations must, first, determine an appropriate threshold of risk. Together with its specialists, it has developed a governance program with the aim to better align the activities of protection of information and operations with the dynamics of business and conformity. Governance plays a fundamental role to achieve the objective of security in an organization in the present, but also to guarantee well elaborated mitigation strategies to deal with future challenges.

In order to deal with present problems, the governance model used by STAM STRATEGIC & PARTNERS GROUP LTD aims to obtain improvements regarding security policies with the implementation of technical controls, audit and evaluations. All this is done with end of stimulate the consciousness among people to make them model their attitude towards secure behaviors, tested and listed inside protocols build within ad hoc created Sop's.

For future challenges, the governance picture used by STAM must be always focused on rising threats factors, rapid changes in the human and technological landscape, opinions and behaviors of people and developments of the work ethics.

7 Security Governance at the heart of your business

Our advisors are periodically busy to implement the governance frameworks that align the technical controls with procedure and structural processes according with the biggest objectives and a general risk management plan. Furthermore, our structure ensures that all activities are aligned with the standards and with the best practice. Our consultants tirelessly work in conformity and safety adopting the following measures to define and implement a governance structure covering the following tasks:

- Define strategy, duties and responsibilities
- Establish risk tolerance and policies
- Implement supporting Governance Framework infrastructures
- Increase awareness and educate employees
- Continually monitor and report results
- Achieve compliance

8 Brief Summary

STAM STRATEGIC & PARTNERS GROUP LTD operates under a common set of business principles, supported by policies and Management plans and implemented through the organization structure.

In support of the business principles there is a Company Defense, Safety, Environment, Quality and Corporate Security Policies & Sops (CSPS) , which requires all the company organization to manage CSPS in a systematic manner.

The Information & Intelligence Division main responsibility is to provide information and proper actions on the challenges facing the management of CSPS and Sustainable Development within the company activities and to detail the systematic approach taken to manage the aspects of the business to ensure

That the company's activities are planned, carried out, controlled, and directed so that the C objectives are met. The main objectives of CSPS Department includes:

- to establish an appropriate Security of customers, native populations and environmental policy;
- to identify hazards, assess risks and implement necessary control measures;
- to identify the areas of potentially significant health, social and environmental impacts resulting from the organizations past, present;
- to identify the legislative and regulatory requirements relevant to the organizations CSPS compliance;
- to identify priorities and establish appropriate CSPS objectives and targets;
- to establish procedures for document control, operational control, records management and emergency preparedness and response;
- to facilitate planning, controlling, monitoring, training, communication, corrective and preventative action, and auditing and management review activities.

To monitor to opinion & sentiment of the native population.

The company's CSPS includes, security, safety, health, environmental, quality and industrial safety sections, These sections are jointly managed by the Information & Intelligence Division, Safety, Environment, Quality and Security Operations, each serving a specific area; however, they eventually merge into one goal: to provide the best and safest environments and results for the Safety, health and environment of the Company, its customers, partners, visitors and society in general. The following is a brief summary of the Division's sub-sections:

9 Occupational Security and Protection Support

STAM STRATEGIC & PARTNERS GROUP LTD have a commitment to protect and promote the security of those impacted either directly or indirectly by field operations in its operations and activities, this includes users, contractors, visitors, suppliers and residents of the vicinity of the company's sites. In line with this commitment the company has established an effective Security Management System to ensure the achievement of the objectives and the desired goal of its Security policy.

The goal of the Company Security and Protection Section is to protect the health of costumers, workers and the neighboring community through the identification, evaluation and control of potential workplace exposures. Each business unit develops and implements an Exposure Assessment Plan that identifies potential risk exposures, and implements controls to prevent costumer and worker or community exposures. Security assessments are conducted to ensure that control measures are protecting the life of potentially exposed workers and costumers.

10 Corporate & Industrial Security

STAM STRATEGIC & PARTNERS GROUP LTD is committed to work toward the goal of zero injuries, illnesses and incidents. Developing a strong culture of safety and delivering superior safety performance is achieved by having engaged leadership working with a committed and skilled workforce. Working safely is embedded in our culture, and each employee and contract worker has the right to stop any job they believe to be unsafe. The section operational standards and procedures, designed to reduce risks during critical activities, provide an added measure of protection and strengthen our existing Security, Safety and Environment (SSE) Management System. They serve to guide the behavior of employees, contractors, customers and are independently assured and verified on the job for all critical work tasks. The main responsibilities of the Safety section includes:

- Prepare and develop security and safety regulations and procedures and monitor their implementation.
- Make sure of the availability of the security & safety means at all vitals facilities
- Set conditions, specifications and technical standards of the safety equipment in addition to classifying and unifying them.
- Schedule maintenance works of safety equipment and organizing regular and unexpected inspection visits.
- Prepare a security, safety and CI guides for the operating sites.
- Provide fire-fighting equipment such as alarms, fixed and mobile fire extinguishers, machinery , and vehicles.
- To implement effective risk management, and provide information on Security, Safety and CI performance.
- Ensure that Security, Safety and CI issues are considered at senior management level where appropriate.
- Evaluate & monitor communication to validate their effectiveness for the level of risk.
- Ensure that lines of communication are available to all staff and managers, on Security.

Leadership: All operations are managed by the Corporate Security Directorate, composed of all the operational directors of the various divisions.

The Corporate Security Directorate Role in STAM Activities:

- **Focus:** Management
- **Objective:** Organize, coordinates, manage all internal and foreign activities
- **Perspective:** General Operations

11 Environmental Protection

Environmental section advises the company on how to minimize their impact on the environment and, in some cases, oversee the delivery of impact reduction strategies. The section is responsible to develop and then measure the success of the schemes for waste management, renewable energy, recycling, and pollution reduction prevention. The main duties of the environmental section include:

- Implementing environmental safety and security policies and practices.
- Devising strategies to meet targets and to encourage best practice.
- Devising the best tools and systems to monitor performance and to implement strategies.
- Ensuring compliance with environmental legislation.
- Assessing, analyzing and collating environmental performance data and reporting information to internal staff, clients and regulatory bodies.
- Confirming that materials, ingredients and so on are ethically or environmentally sourced.
- Liaising with internal staff including senior managers and directors.
- Providing environmental training to staff at all levels.
- Writing plans and reports.
- Keeping up to date with relevant changes in environmental legislation and initiatives including international legislation where applicable.
- Producing educational or information resources for internal staff, clients or the general public.
- Liaising with regulatory bodies such as the Environment Agency.
- Implementing environmental safety and emergency policies and practices.
- Providing safety training to staff at all levels.

Leadership: All operations are managed by the Disaster & Emergency Management Director (Emergency Management operations within your organization).

The Corporate Security Directorate Role in STAM Activities:

- **Focus:** Emergency Operations Management.
- **Objective:** Organize, coordinates, manage all internal and foreign activities.
- **Perspective:** General Operations.

12 Quality Protection Division

Quality section aim to ensure that the company operations is fit for purpose, is consistent and meets both external and internal requirements. This includes legal compliance and owners expectations. The sections role is concerned with monitoring and advising on the performance of the quality management system, producing data and reporting on performance, measuring against set standards.

The section liaise with other company departments and staff throughout the organization to ensure that the quality management system is functioning properly. Where appropriate, the section advice on changes and how to implement them and provide training, tools and techniques to enable others to achieve quality standards. The main roles of the Quality section includes:

- Devising and establishing a company's quality procedures, standards and specifications.
- Reviewing legal requirements and making sure they are met.
- Working with purchasing staff to establish quality requirements from external suppliers.
- Setting standards for quality as well as health and safety.
- Making sure that operation and production processes meet international and national standards.
- Looking at ways to reduce waste and increase efficiency.
- Defining quality procedures in conjunction with operating staff.
- Setting up and maintaining controls and documentation procedures.
- Monitoring performance by gathering relevant data and producing statistical reports.
- Making suggestions for changes and improvements and how to implement them.
- Using relevant quality tools and making sure managers and other staff understand how to improve the business.
- Making sure the company is working as effectively as possible to keep up with competitors.

Leadership: The Director of Quality Protection (is responsible and ensures that business operations are fit for purpose, are consistent and meet both external and internal requirements within your organization). IT works in collaboration with the Legal & Communication Division Director, CEO.

The Quality Protection Director Role in STAM Activities:

- **Focus:** Focus: Establish/adhere to standards
- **Objective:** Objective: Organize and manage all internal and foreign activities
- **Perspective:** General Operations

13 Operational Security

Although security risks can never be fully eliminated, we believe they can be effectively managed. We have taken comprehensive steps and invested heavily to address potential threats to our operations in the various locations and operating sites. Through systematic security processes, we continuously monitor and assess the security environment, and company security policies. To provide for the safety and security of our personnel and operations worldwide we implement a wide variety of security measures. As an operator of security in challenging locations, we work closely with governmental agencies, nongovernmental organizations, our peers and local communities on initiatives to identify, deter, prevent and mitigate a range of potential threats to company personnel, facilities and operations.

Security Operations & Project Support Division

STAM Strategic & Partners Group Ltd provides the full range of Security Operations Services, including Executive Protection, Close Protection, House Detail, Key Point Security and Manned Guarding, Asset Protection (static and transit), Commercial and Residential Security and Surveillance.

This division is directed by the Director of Hostile Environment Operations, which organizes and manages the operations, selects the operational teams in collaboration with the Information & Intelligence Division.

This division deals with the management and control of the following services:

- **Executive VIP Close Protection:** STAM STRATEGIC & PARTNERS GROUP LTD utilizes the expertise of former U.S. Department of Defense PSD Contractors, providing Tier 1 specialist executive protection to diplomats, CEO's, NGO's, and high net worth individuals, ensuring a bespoke service, tailored to the clients wishes. STAM prides itself on the professionalism of its Personal Protection Specialists (PSS) who are mindful of the profile of their clients, are able to blend in with their surroundings, while still providing a discreet but highly effective level of security.

- **Hostile Environment Close Protection:** STAM STRATEGIC & PARTNERS GROUP LTD employs, trains and certifies PSS operators with strong special operations forces backgrounds from within the special operations community in the United States, the United Kingdom and Europe. STAM' operators conduct close protection operations in some of the world's most hostile and remote environments including Iraq, Afghanistan, North Africa, and Latin America. Every Protective Rings of Security (PSR) Detail and Personal Security Detail (PSD) is supported by a Tactical Operations Center within the regional area of operations providing information and intelligence management, operational planning and implementation including the provision of armed security, life support, command, control, and redundant methods of communications. All PSS operatives are trained in cross-cultural communications, are given specific regional and area orientation, rudimentary language skills and are sensitive to the environment within which they operate. Each PSS operator is well versed in local laws and customs and implements the rules of engagement using approved escalation of force procedures. This additional training and subsequent certification is what sets our operators apart from our competitors.

- **Key Point Security:** Using proven threat and risk methodology combined with a wealth of experience STAM experts can identify and counter risks to provide effective key point security plans and ensure implementation and management occur. From corporate headquarters to strategic power plants, STAM can provide the right level of manpower and technology to protect property in a cost effective manner.

- **Asset Protection:** STAM's security operators have a wealth of experience in the field of asset protection, from escorting high value cargo in transit (convoy escort) to safeguarding specialized high value equipment on static locations. All client requirements are taken into account and robust security postures implemented to ensure integrity of the assets wherever they may be.

- **Commercial and Residential Security:** With STAM' experience and expertise coupled with proven past performance security operations not only provide protection to commercial and residential properties but also to NGO and government compounds and facilities around the world as well providing guards and access control where needed coupled with systems design and technology where appropriate.

- **Surveillance and Countersurveillance:** STAM has a proven covert surveillance capability, and can deploy teams on short notice to conduct foot or mobile surveillance in urban or rural environments. Using experienced operators and state of the art technical surveillance equipment, STAM can covertly collate intelligence, and importantly can conduct effective counter surveillance measures. STAM has a specific capacity in the field of Transmissions and TSCM

Leadership: The Director of Hostile Environment Operations (Operations Security, is responsible for for the organization and management of all security operations within your organization).

The DHEO Role in STAM Activities:

- **Focus:** Establish/adhere to standards, fix system weaknesses rule driven
- **Objective:** Organize and manage all internal and foreign security operations, Deny/prevent unauthorized access reduce vulnerability
- **Perspective:** Internal perspective looking inside-out

14 Operational Security

The scope of the management Systems covers all Company operating assets and locations. It is aimed to be utilized as a source of reference for the Management, Department Managers and representatives to ensure compliance with the local laws, to achieve continuous HSS performance improvement and to demonstrate that HSS related risks are managed to a level which is as low as reasonably practicable.

The set of management systems adopted by the company in the management of its business includes the ISO 9001 standard for quality systems and 18788/PSC-1/9001.

- The quality management system of ISO 9001 aims at achieving the requirements that guarantee the quality of the services and the final product of the company in accordance with the legal requirements and the marketing specifications.
- ISO 18788/PSC-1/9001 management system for private security operations, and management standard of quality security company.

These systems are primarily based on the identification of all internal and internal processes of the Company and the management of associated risks that will affect the security, safety and the environment and the implications associated with our business. HSS management systems are assessed periodically using the company Operations Excellence process, an integrated systematic and collaborative approach, to guide continuous improvement and ultimately achieve the highest standards of excellence.

They analyze current status, identify areas for potential improvement, and then implement key activities to reduce risk and further enhance HSS performance.

As part of STAM Marketing, the Business Management Directory has created the rules for STAM and the advertising system. Based on the special and discreet PMS'C business, it does not correspond to the usual corporate advertising. However, the well-known advertising techniques are used. As described, the STAM advertising campaigns, specially designed for business, accompany the events organized at affiliated facilities. The content of each advertising action is based on the website (www.stamsolutions.com), within the social networks (facebook, Instagram, Twitter, youtube, LinkedIn), a marketing tool constantly updated by the respective Company Management section. The task and purpose of the website is;

- Contact for interested potential clients worldwide,
- To provide essential information regarding STAM Services, the Company and Service Policies,
- To demonstrate and convince website visitors of the difference to other PSC, regarding STAM capabilities and performance,
- To make the website a forum for discussion about PMS'C services,
- To establish an "open" and a "just for members" access,
- To deliver intelligence information about critical environments and other intelligence products,
- To reflect a sympathetic, professional and competent picture of STAM,
- To establish an open "news" section focused on PMS'C business,
- To create a website HR section.

There is a special STAM Spokesman (PR Manager). He will be the recipient of any type of contact with the media, actively and passively, and will coordinate

- Official company declarations,
- External information campaigns (newspapers, television, authorities, etc.),
- Updating the website,
- Other advertising activities of the company

Always under direct control of the Information & Intelligence Division, the CEO, the board.

Leadership: The Director of Hostile Environment Operations (Operations Security, is responsible for for the organization and management of all security operations within your organization).

The Management System Director (CEO) Role in STAM Activities:

- **Focus:** Corporate Management
- **Objective:** Organize, manage Corporate Activities & Business.
- **Perspective:** Internal and external perspective management, general coordination

15 Informations Security, Protection & Counterintelligence Policy Management (CI)

Counterespionage threats (CI) pose a serious threat to STAM Strategic & Partners Group Ltd, the U.S. Department of Defense , UK Gov and security. It is STAM's policy to ensure that all potential CI threats are identified and reported to the United States Department of Defense (DoD), in accordance with the DoD Directive 5240.06. and to the British authorities. This division is formed by a team of specialists coming from important experiences both within important governmental and private intelligence agencies.

All the activities of this division are directed by the Information & Intelligence Division Director and by the company board. To guarantee this, STAM has:

- 1) Appointed a CI referent to centralize and streamline all CI concerns;
- 2) Created a CI training policy that all STAM employees must pass yearly;
- 3) Created a reporting process to ensure potential CI threats are reported to the US Department of Defense and UK Gov.

■ Appointment of CI Referents

STAM's Director of Information & Intelligence Division and Ceo will serve as the organization's official CI referents. CI referents will be responsible for implementing the STAM CI policies and all CI issues not specifically outlined in this policy.

■ Awareness Training

All STAM employees will be required to pass the training course "Counterintelligence Awareness and Reporting Course for DoD," which is the same training that DoD components receive, as required by DoD Directive 5240.06.

STAM employees who have not passed the above CI training course cannot participate in DoD contracts. CI training must be passed once each calendar year. STAM employees working on a DoD contract who have not completed the CI training in a calendar year will be given 30-day probation period to complete the training.

Example: STAM employee completes the training in year 1 and is assigned to a DoD contract. The employee does not complete the training in year 2. January of year 3 will be the probation period. If after 30 days, the employee does not complete CI training, he or she will be removed from the contract.

■ Information & Intelligence Division Framework

Information & Intelligence Division advise the company on how to minimize their threats on the corporate and on the projects, oversee the intelligence & counterintelligence activity and strategies. The section is responsible to develop and then measure the success of the operations . The main duties of the Information & Intelligence Division includes: **Information & Intelligence Division (G2) Analysis & Assessment (A2)**

STAM STRATEGIC & PARTNERS GROUP' Information & Intelligence Division (G2) Analysis & Assessments (A2) division supplies succinct and focused advice on current and future threats for clients who need to operate in volatile and hostile environments around the world. G2 & A2 maintains and constantly

develops a network of reliable sources on areas of interest to STAM' clients. Using the latest technology, A2 delivers a rapid, high-quality and easily accessible service. Some G2 & A2 products are:

■ **Strategic Operations Center (SOC).** The SOC delivers a 24/7 SMS security alert service on major security-critical events in the region through the Information and Intelligence Management Division, using a special team of experienced A2 analysts. Clients also receive authoritative "post incident analyses" to advise on how security events may impact their business and personnel.

■ **SITREP.** SITREP is a series of twice-monthly updates, principal briefings, board summaries and alerts on security-related issues. These situational reports (SITREP) cover a wide range of countries in the Middle East, Africa, Eastern Europe, South America and the Pacific Rim.

■ **Risk Reduction Triggers (RRT's).** RRT's provide expert assessment on developments which may impact on a Client's specific interests and concerns. A2 uses a statistical approach to underpin its qualitative research and tailors the data being measured to a list defined, agreed and kept under constant review with STAM' clients.

■ **Commissioned Reports.** The commissioned report allows a Client to task A2's expert team on single issues of very specific - and often highly confidential - interest to their business. A2 coordinates its reports with an internationally-recognized polling organization that can add significant insights to our research into countries, locations and specific issues.

■ **Executive Insight Briefings (EIB).** The EIB gives clients the chance to hear expert and authoritative briefings across the full range of threat and risk issues. A2 can arrange these briefings either in conjunction with the above reports, or as a stand-alone service.

■ **Analyst and Assessment Detail.** The Analyst and Assessment Detail provides clients with the services of our expert analysts whether for a limited period to complete a specific piece of research, or to work full-time with your corporate security team.

Leadership: The Director of Information & Intelligence Division (DII) (information security, is responsible for protecting sensitive and classified information and technology within your organization).

The DII Role in STAM Activities:

- **Focus:** Identify/understand/counter adversary collection effort mission driven
- **Objective:** Deter/detect/mitigate adversary collection, reduce or mitigate threat
- **Perspective:** Adversary's perspective looking outside-in

16 Socio-Cultural Awareness Analysis Division (SCA)

We deliver stability for our clients by aligning their activities and business strategies with the norms, values, and needs of the populations with whom they interact. STAM has developed a unique, multi-layered socio-cultural analytic, population and key leaders engagement framework with multi layered intelligence, to satisfy clients' needs. Our blend of social science analysis with cutting edge intelligence processes and civilian cooperation experiences, targeted development activities, and persistent monitoring provides actionable early-warning threat indications and a range of pre-emptive options to significantly reduce the likelihood of adverse events from occurring and the negative consequences of any hostile incident.

Some SCA products are:

- Culturally Attuned Analysis
- Population Engagement Studies
- Human Terrain Mapping
- Tailored, Intuitive Analytical Visualization Products
- Targeted Engagement Activities
- Actionable Early Warning through
- Networks & Relationships
- Opinion & Sentiment Tracking
- Strategic Messaging & Communications

1. We provide unparalleled consultation on population dynamics based upon decades of experience working identity conflict, tribal and clan dynamics, and complex security environments.

2. Our stability and risk mitigation approach addresses the core sources of conflict, employs a unique blend of applied military intelligence techniques and targeted development activities, is combat proven, and augments existing security activities.

3. Our persistent monitoring capability allows us to identify both positive and negative trends, adjust activities, and maximize customer image.

Raising consensus is the cornerstone of all compliance strategies and theories created and implemented by STAM Strategic & Partners Group Ltd. The aim is to reduce risks and guarantee a secure framework for rebuilding operations. This is based upon specific modus operandi based on the ability to shape secure relations through structured communication.

This allows us to penetrate in a total neutral way into

those countries characterised by underdeveloped social, economical, environmental and infrastructural conditions during social conflicts or post-war scenarios, or during natural and environmental emergencies.

This hybrid approach, which is somewhat in-between a security measure and humanitarian aid, is what we deem vital in order to re-establish legality and social cohesion.

This hybrid approach combines the Italian communication expertise and the tactical knowledge of the UK/USA.

This division is directly linked to the Information & Intelligence Division.

SCA Division act as a liaison between native populations, civilian authorities, customers and company.

The SCA Division combines regional expertise, language competency, political awareness, cross-cultural communication and professional military and cooperations skills to conduct socio-cultural awareness operations in support of corporate project.

Leadership: The Director of SCA (Operations Security, is responsible for for the organization and management of all SCA operations within your organization).

The SCA activities Director Role in STAM Activities:

- **Focus:** Organization of SCA activities and operations and consensus engineering
- **Objective:** Organize, manage SCA Activities & Cooperation project
- **Perspective:** SCA Operations management and coordination

17 Socio-Cultural Awareness Analysis Division (SCA)

The Training Division is responsible for the conceptual and technical design support of the Training Activities:

- Development and approval of programs of instruction
- Lesson plans and training schedules
- Course and Instructor certification
- Conducting training and course reviews
- Student certification and credentialing
- Coordination with Business Development for projected contract and client support.

Leadership: The Training Directorate (Training, is responsible for for the organization and management of Training within your organization).

The Training Directorate Role in STAM Activities:

- **Focus:** Organization of Training activities
- **Objective:** Organize and manage Training and Mentoring Activities
- **Perspective:** Training management and coordination

18 Standard & Operational Procedures

The company had developed a set of standards procedures which are aimed to guide the whole organization toward the compliance with the main international requirements in what regards the management of the

Security aspects, below are a list of those main controlled documents:

- HSS Strategic objectives and annual plans
- Corporate Force Protection Condition (FPCON)
- Corporate Intelligence & Counter Intelligence procedures (CI)
- Risk management procedure
- Legal and other requirements procedures
- Training and Competence procedures
- Documents control procedures
- Communication procedures
- Procurement and contractor procedures
- Emergency preparedness and response management procedure
- Monitoring and measurement requirement
- Accident management procedure
- Internal and external audits procedure
- Non-conformance, corrective and preventive action procedure
- Records Management procedure
- Management review procedure

Based on risk identification and risk management results, the Company has prepared, approved and adopted several practical procedures that is aimed to control the risks associated with the Company's activities and security operations in its various locations.

The following is some of the current procedures:

- Environmental Risk Studies of the Company's Activities
- Health risk studies of the company's activity
- Security risk studies for company sites
- Kidnapping Risk Studies
- Terrorism & Insurgency Risk Studies
- Counter-Intelligence Studies
- Guidance procedures for hazard identification and risk management
- Personal security equipment procedure
- Management of change procedure
- Indigenous & Native Engagement
- Confined space procedure
- Security and Safety procedures for air transport operations.
- Security and Safety procedures in land transport operations.
- Health emergency response plan
- Industrial emergency response plans
- Environmental emergency response plans
- Fire detection and response procedures

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