

Corporate & Social Responsibility Policy

This policy covers Argenbright Security Europe Limited (13249975) and its subsidiaries, The Protector Group (03448690) and Amberstone Security Limited (10259434). All operating under the same policies, procedures, and management.

Our Principles

As an organisation Argenbright Security Europe Ltd. (and its subsidiaries) - hereinafter “ASEL” - recognise that we must integrate our business ethics and operations to encourage and sustain standards that meet the expectations of our stakeholders, who include our employees, clients, the community, consumers, suppliers, and regulators.

We understand that our social, economic, and environmental responsibilities to our stakeholders are integral to our business. We aim to demonstrate our responsibilities through our actions and within our corporate policies.

We take seriously all feedback that we receive from our stakeholders and, where possible, maintain open dialogue to ensure that we fulfil the requirements outlined within this policy.

We shall be open and honest in communicating our strategies, targets, performance, and governance to our stakeholders in our continual commitment to sustainable development.

Responsibility

The Chief Executive Officer (CEO) is responsible for the implementation of this policy and will make the necessary resources available to realise our corporate responsibilities. The responsibility for our performance to this policy rests with all our employees throughout the organisation.

Our Partnership Focus

We will always engage, collaborate with, and support our stakeholders in carrying out our mission in a professional manner.

We shall operate an equal opportunities policy for all present and future employees which will ensure clear and fair terms of employment. We will ensure that there is no discrimination during our recruitment, promotion, or termination processes based on race, religion, gender, sexual orientation, maternity, marital or family status, disability, age, national origin, union, or political memberships. Provision of adequate resources will be made to enable continual training and development

We shall provide safeguards to ensure that all employees are treated with respect and without sexual, physical, or mental harassment.



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We shall maintain a clear and fair employee remuneration policy and shall maintain forums for employee consultation and business involvement.

We shall provide, and maintain, a clean, healthy, and safe working environment. Induction to the organisation will ensure that all aspects of safety, health and environmental legislation that are relevant to our employees is communicated and reviewed as and when required. Provision will be made for suitable welfare facilities and responsibility for safety, health, and the environment will be given to a senior member of management.

We shall strive to improve our environmental performance through the implementation and continual development of our environmental policies. Attention will be paid to the reduction in energy consumption and our carbon footprint. We will, wherever possible, use renewable and sustainable products and will continually improve our commitment to minimise waste and to recycle, which will reduce our environmental impact within the community.

We shall uphold the values of honesty, partnership, and fairness in our relationships with stakeholders. Our contracts will clearly set out the agreed terms, conditions, and the basis of our relationship and we will operate in a way that safeguards against unfair business practices and conforms to all regulatory legislation.

We shall ensure a high level of integrity during business performance while minimising and effectively managing risk. We will record and resolve customer complaints in accordance with our published standards of service.

We shall encourage suppliers, contractors, and our security partners to adopt responsible business policies and procedures for mutual benefit.

We shall encourage dialogue and involvement with local communities. We will encourage our employees to help local community organisations and activities, and will support wherever possible by engaging in work experience programmes and donating our time and resources to ensure that the community is a safe place to live and work in.

Purpose and Aims

The purpose of this policy is to provide guidance on the organisation's approach to Corporate Social Responsibility and to ensure all employees work within and/or to the policies established by the organisation. Everyone is required to adhere to the standards contained within this policy but, where any other policy adopted by the organisation contains any further provisions, they must not be inconsistent with the overall organisational policy and aims. Therefore, this document sets out the Corporate Social Responsibility arrangements that ASEL has established and is tailored to represent the overall organisation.



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The organisation's business philosophy has been developed around a core set of values which are fundamental to its development and success.

Our values focus clearly on our customers. Integrity runs throughout our organisation and, by employing and developing some of the best people in the industry, we can use our security expertise to develop solutions for customers and financial performance for the organisation and its shareholders.

The organisation has evolved an ethical business approach when undertaking service provision for its many clients and customers, and the purpose of this policy is to ensure that all our managers and employees have a clear understanding of the company's minimum standards of operation and the expectations of our customers and stakeholders.

It is essential that the organisation demonstrates these values and ensures that the ethical business standards set out in this policy are demonstrated throughout our area of operation.

We are committed to these standards and will take appropriate action in the unlikely event that they are not being met.

Corporate Social Responsibility / Business Standards Policy

1. All Dealings

- Business Practice and Entertainment
- Our Employees
- Health & Safety
- Recruitment, Selection, Employment, & Working Conditions

2. Dealing with the Government, Regulators and Compliance with the Law

- External Reporting
- Confidential Information
- Accounting Standards and Records
- Memberships of and contributions to Political Parties

3. All Other Areas

- Customers and Suppliers
- Competitors
- Community
- Environment



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- Emails and the use of the Internet
- Harassment
- Staff complaints, whistleblowing, and suggestions
- Policies and Procedures
- Implementation and compliance with Code of Conduct Policy
- Charity and sponsorship

4. All Dealings

The following standards of conduct apply to all employees and other persons acting on behalf of the organisation. In particular, the organisation's senior management has a special responsibility to lead according to these standards.

Sales of the organisation's services and products, and purchases of products and services from suppliers, will be made solely based on quality, performance, price, and value, and never based on giving or receiving inducements in the form of payments, gifts, entertainment, or favours, or in any other form.

Every employee has a duty to avoid business, financial or other direct or indirect interests or relationships which conflict with the interests of the organisation, or which divides his or her loyalty to the organisation. Any activity which even appears to present such a conflict must be avoided or terminated unless, after disclosure to the appropriate level of management, it is determined that the activity is not unethical or improper, does not compromise integrity, and is not detrimental to the reputation and standing of the company.

Business Practice and Entertainment.

The organisation is resolutely opposed to bribery and corruption in whatever form it may take. Gifts or entertainment may only be offered to a third party if they are consistent with customary business practice in the relevant territory, are modest in value, and cannot be interpreted as inducements to trade. Where there is doubt, guidance should be sought from the relevant Manager or Director. No financial or other inducements should be given to third party organisations or to individuals from such organisations in any circumstances. This includes government agencies and representatives.

Employees should;

- Not accept gifts, money, or entertainment from third party organisations or individuals, where these might reasonably be considered likely to influence business transactions. Unsolicited gifts, other than trivial ones with a low value, should be returned. In a culture where such an action might cause offence, the gift should be declared to the company and, if practical, donated to an appropriate charity.



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- Engage in honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
- Maintain effective procedures to prevent confidential information being misused and make it clear that the use of confidential information for personal and corporate gain will not be tolerated.
- Advance the legitimate interests of the organisation, having regard to our values and standards, as set out in this code.
- Comply with all applicable laws, rules, and regulations where the organisation operates.

Our Employees

Our success depends on the commitment and competence of our employees and our strategy is therefore aimed at ensuring that employees are trained to be totally competent in their roles and have the opportunity to develop to their full potential. Formal career and succession management processes help support the movement of managers within the company as part of their career paths, and it also enables us to share knowledge and expertise throughout the business. We believe it is important for employees to be treated fairly and with dignity and respect. Such treatment is the basis for an environment which engenders team spirit and a commitment to the company, which in turn helps to maintain good staff retention levels. Communication and consultation with employees takes place on a wide range of issues. There are channels for communication, including newsletters and a newly devised intranet, and the organisation are members of several representational bodies. Our policy of equal opportunity ensures that decisions relating to the recruitment, development, promotion, and training of individual employees are based solely on job requirements.

The organisation supports the principles of the United Nations Universal Declaration of Human Rights and is committed to upholding these principles in its policies, procedures, and practices. Respect for human rights is and will remain integral to our operations.

As a provider of security services, operating in diverse markets and cultures, the organisation recognises its obligations to supporting Human Rights as a consequence of its principles of acting responsibly and with integrity. This Policy outlines the organisation's approach.

We strongly endorse the principles set out in the Universal Declaration of Human Rights, in particular those relevant to our operations which are:

- The right to freedom from discrimination;
- The right to personal safety and security;
- The prohibition of slavery, forced or child labour;
- The prohibition of torture, cruel, inhuman, or degrading treatment or punishment;



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- The right to privacy;
- The right to religious freedom;
- The right to freedom of opinion and expression;
- The right to freedom of peaceful assembly and association;
- The right to free participation in political life;
- The right to work;
- The right to rest and leisure;
- The right to an adequate standard of living;
- The right to education;
- The right of minorities and indigenous peoples to protect their identity;
- The right to cultural participation.

We will respect freedom of association and the right to collective bargaining in accordance with local legislation and practice.

Employment will be freely chosen, with no use of forced or child labour.

In dealing with our employees, we will act in compliance with national regulatory requirements and government guidelines. We will not discriminate based on gender, colour, ethnicity, culture, religion, sexual orientation, or disability.

Employees will be paid and work hours at least as favourable as the terms established by national legislation, agreements, or industry standards.

We will take measures to ensure that the work of our employees does not compromise accepted human rights conventions, whilst recognising and respecting the diversity in local cultures across the areas in which we operate.

We will endeavour to ensure that we work with business partners who conduct their business in a way that is compatible with our policies of respect for human rights and ethical conduct. We will work with customers to ensure that contractual requirements do not infringe human rights.

We value all our employees for their contribution to our business and their opportunities for advancement will be equal and not influenced by considerations other than their performance, ability, and aptitude.

Employers' obligations to employees under labour or social security laws and regulations must be respected. The business and their employees will work towards creating permanent long-term



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relationships. To achieve a working environment in which team spirit and commitment to the organisation's goals and values are maintained, the organisation will ensure that individual employees are treated fairly and with dignity and respect. They will also be provided with the opportunity to develop their potential and, if appropriate, to develop their careers further with the company.

Health and Safety.

The organisation places the highest priority on promoting the health and safety of employees whilst at work. In particular, it will constantly review the effectiveness of its methods of operation to best protect those who work in a high-risk environment.

The organisation has a published Health & Safety Policy which acts as a minimum standard for the organisation. In adopting these standards, the organisation seeks to create a workplace and work systems which enable staff to feel safe and secure and where management is seen to take a proactive interest in staff welfare. The organisation has appointed a suitably qualified person to develop the company's own policies and procedures and has undertaken management and employee training.

Risk assessment processes have been developed and a procedure put in place for monitoring compliance with policies and procedures. Accident reporting and analysis is undertaken at various levels within the organisation.

Recruitment, Selection, Employment and Working Conditions.

Pre-employment Screening and Selection - To protect the interests of its customers and employees, and because of the nature of its business, the organisation will apply rigorous pre-employment screening and selection techniques.

Working Environment - Maintain a working environment that provides appropriate remuneration, including training and opportunities for personal development.

Discrimination - Be intolerant to discrimination, harassment, or victimisation. Recognise diversity in recruitment and dealings with employees. Create a favourable employee relations environment in which the involvement of all employees is encouraged.

Employee Support - Support employees who are aware of and are willing to report business malpractice and establish procedures to enable people who genuinely believe that malpractice is occurring, has occurred, or is likely to occur within the business to raise issues internally without fear of recrimination.



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Safe and Clean Working Environment - Provide a clean, healthy, and safe work environment, stressing the obligation of all employees to take every reasonable precaution to avoid injury to colleagues and members of the public.

The Illegal Use of Drugs and Alcohol - Prohibit the illegal use of drugs on our premises or our client's premises and encourage any member of the company with a drug or alcohol dependency to seek help.

Illegal Immigrants / Child Labour - Prohibit the use of forced or child labour, and the employment of illegal immigrants.

5. Dealing with the Government, Regulators and Compliance with the law

The organisation will comply fully with all relevant national laws and will act in accordance with local guidelines and regulations, including those which are industry specific (The Security Industry Authority (SIA) and the Private Security Industry Act 2001), governing our operations.

It is the responsibility of all managers to ensure, by taking legal or other expert advice where appropriate, that they are aware of all local laws and regulations which may affect the part of the business in which they are engaged.

Even where the law does not apply, applicable standards of ethics and morality relate to our activities and require the same diligence and attention to good conduct and citizenship. Employees must avoid situations where appearance of impropriety exists, even though the circumstances might not otherwise specifically violate this code of conduct.

Maintain a constructive and open relationship with the Government and Regulators (SIA) to foster mutual trust, respect, and understanding.

External Reporting

The organisation may be required to make statements or provide reports to regulatory bodies, government agencies, or other government departments. Care should be taken to ensure that such statements or reports are correct, timely, and not misleading. Senior management must be made aware of any sensitive disclosure before it is made.

Care must also be taken when making statements to the media that information given is correct and not misleading. Enquiries from the media should be referred to the organisation media manager and statements should only be made by designated spokespersons.



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Confidential Information

Employees must not make use of confidential information obtained through their employment for personal gain, nor disclose such information to any third party during or after their employment. ‘Confidential information’ is either information that has been specifically described as being confidential or is otherwise obviously confidential from the surrounding circumstances.

The term “confidential information” does not include information already in the public domain, information that was already known to the recipient at the time of its disclosure, or information that is required by law to be disclosed.

Accounting Standards and Records

All accounting documentation must clearly identify the true nature of business transactions, assets, and liabilities in conformity with accepted accounting principles. No record or entry must be false, distorted, incomplete or suppressed.

Membership of Political Parties and Contributions to Political Parties

The organisation does not make contributions to political parties in the UK or any other country. The company does not condone the membership of or contribution to any proscribed political organisations deemed by the Government to be linked with extremist political or religious views.

6. All Other Areas

Customers and Suppliers.

Any business transactions for the supply of goods or services should be based on normal ‘arm’s length’ business principles. These principles should cover pricing and other contractual terms and must be as defensible as those to which independent parties might be expected to agree.

Mutual trust and confidence between the organisation and its customers are vital. All employees should strive to consistently deliver service excellence and value for money, meeting customers’ expectations and anticipating their changing requirements.

- Treat customers fairly, openly, and honestly.
- Provide high standards of service.
- Operate an effective complaints procedure to deal with situations where these standards are challenged.
- Aim to provide and promote a range of services that meet client needs.
- Maintain the confidentiality of client information, save where the law requires or permits disclosure, or the client has given prior written consent.



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- All suppliers are entitled to fair treatment and all potential suppliers should have a reasonable opportunity to win the organisation's business.
- It is the organisation's policy to pay suppliers on time in accordance with agreed terms of trade.
- The organisation sets high standards for its suppliers in the context of its own ethical policy and maintains the highest possible standards of integrity in business relationships with suppliers.
- Encourage the use of those suppliers who operate with values and standards equivalent to ours.
- Work together with suppliers to improve all aspects of performance.
- Agree terms of payment when orders for goods or services are placed and pay in accordance with those terms.

Competitors

The organisation will always compete vigorously, but in a fair and ethical way. Competitive success is built on providing good value and service excellence. Competitors should not be disparaged. When in contact with competitors, employees will avoid discussing confidential information and no attempt will be made to improperly acquire competitors' trade secrets or any other confidential information. Employees must not discuss pricing strategies or undertake any arrangements which would conflict with the laws of the area concerned.

Community

The organisation is fully committed to supporting and assisting the communities in which the organisation operates through a variety of means, including charitable fund-raising, sponsorship of community projects, and voluntary work by employees. The organisation will also serve local communities by providing good employment opportunities and effective services and products which safeguard the public good.

- Contribute to the social and economic wellbeing of those communities where we are an employer.
- Encourage employees to participate in projects and initiatives to strengthen those communities.
- Work to minimise adverse environmental impact of our business operations and to achieve environmental policy targets for our business and those of our clients.
- Ensure that we conduct our activities, as far as possible, in a manner sensitive to the cultural and social traditions of communities with which we come into contact.

Environment

The organisation will conduct its business with respect and consideration for the communities in which we operate, and for the environment. We will take steps to minimise any disturbance to communities because of our operations. As a service organisation, our environmental impact is small in relation to manufacturing industries. However, in each of our operations we will strive to minimise our impact on the environment through reduction of waste, vehicle emissions, and energy consumption.



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Emails and use of the Internet

Employees are permitted to use emails and the internet where appropriate for their job. Limited personal use is also permitted in an employee's own time, e.g., during breaks, in accordance with local guidelines. Employees should exercise due care to ensure that the organisation is not committed to any inappropriate or unauthorised liability.

Employees must not use the email or internet in any way which would be in breach of copyright, contracts, or licence agreements. Derogatory comments about any organisation or individual must never be made. Viewing or distributing of pornographic, paedophilic, or other data which could be considered offensive is expressly prohibited. Any personal views in emails must be clearly marked as such. Employees should be considerate in their use of emails and the internet to avoid overloading the system at peak times or with trivia, which may prevent other users from doing their jobs effectively.

Employees should exercise due care to ensure that viruses or other harmful software are not knowingly imported or spread.

Harassment

Harassment can be defined as unwanted behaviour which a person finds intimidating, upsetting, embarrassing, humiliating, or offensive. Conduct involving the harassment (racial, sexual, or of any other kind) of any employee is unacceptable. Should an employee believe that he or she has been harassed, the matter should be raised with the relevant manager who will arrange for it to be investigated without delay, impartially and confidentially.

Staff Complaints, Whistleblowing and Suggestions

Staff can expect that the organisation will give due consideration to their constructive suggestions and will provide a considered and objective review of genuine concerns and complaints. Such concerns include fraud, misrepresentation, theft, harassment, discrimination and non-compliance with regulations, legislation, policies, and procedures.

Concerns must be investigated impartially so that the employee's rights are protected. Employees who have concerns about potential unethical behaviour should advise their manager in the first instance. Employees may do this anonymously if they so wish. To ensure that confidentiality is maintained, employees should not discuss such concerns with colleagues or other third parties, unless specifically authorised or unless it is a legal requirement.

If the whistleblower is dissatisfied with the response to the concern which he has raised, or if the concern relates to a matter of exceptional gravity or sensitivity, he can contact the Operations Director in accordance with the company Whistleblowing policy as laid down in the Employee Handbook.



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Policies and Procedures

The organisation recognises that there are risks associated with carrying out any business activity. Management is responsible both for ensuring that policies and procedures are in place to manage risks and for complying with those policies and procedures. Employees should ensure that they are aware of the risks associated with their activities and that they comply with policies and procedures in place to manage those risks.

Implementation and Compliance with this Code of Conduct Policy

This Corporate Social Responsibility Policy must be adhered to by all directors, managers, and employees of the organisation as a minimum standard, and which is issued to all senior managers. It will be published on our intranet and incorporated into future employment contracts where applicable. It will be monitored as part of the organisation's compliance processes. The policy will be reviewed annually.

The organisation will explain to employees our values, the standards required under this code, and any associated responsibilities.

The organisation will demonstrate that procedures are in place to ensure compliance with this code and periodic audit will be undertaken internally.

Failure to comply with this code may lead to disciplinary or criminal action being taken against individuals.

Charity & Sponsorship

Businesses and employees throughout the organisation are encouraged to become involved with their local communities by offering their time and funding to support projects and issues in the local areas in which they work.

Policy Revision

This policy will be revised annually to keep abreast of changes to associated regulations, law and/or the needs of the business.



Dan Hardy,
Managing Director

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