



Securitem Group Ltd

BRIBERY AND CORRUPTION POLICY

1. Introduction

- 1.1 This is a Securitem Group policy and as such covers all companies affiliated with the Group – namely Securitem Consultancy Ltd, Securitem Installations Ltd, Securitem Operations Ltd and Securitem Training Ltd. All employees, workers and contractors of the Companies will adhere to and operate within the bounds of this policy.
- 1.2 This policy does not form part of any employee's contract of employment, and the Company may amend it at any time.
- 1.3 The Securitem group does not tolerate any form of bribery and corruption, and it is a requirement of this policy that all employees, workers and contractors comply with both the letter and spirit of this policy and all applicable anti-corruption laws.
- 1.4 In the course of their duties or position employees, workers and contractors may come into contact with organisations or individuals who offer gifts or hospitality to them or those close to them, such as friends or relatives. There will also occasionally be a need for employees to provide gifts and hospitality to partners. The receipt and provision of gifts and hospitality must be considered within the context of the Bribery Act 2010 ('the Act') which came into force 01 July 2011. It is essential that all employees, workers and contractors comply with the Act to protect themselves from breaking the law and protecting the reputation of the Company.
- 1.5 This policy defines the arrangements to help all to decide whether gifts or hospitality should be accepted or not and when it is appropriate to offer gifts or hospitality. It aims to ensure that actions do not compromise integrity or give rise to the suggestion that partners have gained favour or advantage as a result. This policy is also intended to act as a control to identify abuse of the policy, prevent bribery and corruption, and reduce the risk of such a perception. This policy applies to employees, workers and contractors at all levels.

2. Bribery Act 2010

- 2.1 The Act defines bribery as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly, or to reward that person for having already done so. It creates new offences of bribing another person and being bribed. All employees, workers and contractors may be considered personally liable for prosecution should such an activity take place within the Company, whether in the UK or abroad.

- 2.2 The provision and receipt of gifts and hospitality is not prohibited under the Act. However, in order to prevent bribery and corruption all employees, workers and contractors must be aware of, and comply with, this policy when accepting or making offers of gifts or hospitality. All provision and acceptance of offers must be reasonable and proportionate to the circumstances – see separate Gifts, Hospitality and Entertainment Policy.
- 2.3 A gift in the context of this policy is something given to an individual in the course of, or resulting from, their duties or employment, or to their close relatives or friends for their personal use and enjoyment with the knowledge of the individual concerned. A gift can consist of services as well as goods.
- 2.4 Hospitality in this context includes entertainment or other benefits given to an individual in the course of, or resulting from, their duties or employment, or to their close relatives or friends for their personal use and enjoyment with the knowledge of the individual concerned.

3. Companies Act 2006

- 3.1 Companies Act 2006 section 176 details the legislative requirements of Directors and their duty not to accept benefits from third parties. It states:

A director of a company must not accept a benefit from a third party conferred by reason of

- Them being a Director; or
- Them doing (or not doing) anything as a Director.

A 'third party' means a person other than the company, an associated body corporate or a person acting on behalf of the company or an associated body corporate.

4. The Giving of Bribes

- 4.1 All employees, workers and contractors must not:

- Make; or
- Offer or promise to make; or
- Authorise or procure anyone to make...

...any payment or gift of money or anything of value, or gift or conveyance of any financial or other advantage, either directly or indirectly, to or for the benefit of any person (including a Public official whether domestic or foreign), that is (or may appear to be) inducing, securing, or rewarding the improper performance by any person of any function or activity (whether or not it was done to obtain or retain business or business advantage).

5. The Receipt of Bribes

- 5.1 Furthermore, employees, workers and contractors must not solicit, request, agree to receive or accept, directly or indirectly, any financial or other advantage or anything of value that is (or may appear to be) related to inducing or rewarding improper performance by anyone undertaking any function or activity.

6. Bribes Paid Through a Third Party

- 6.1 The Act explicitly covers bribes paid through a third party, making it an offence for employees, workers, contractors and commercial organisations to offer, promise, or give an advantage indirectly to influence someone.

7. Broader Anti-Corruption Laws

- 7.1 Because of the Securitatem Group has a global reach, employees, workers and contractors must comply with the domestic anti-corruption laws of many different countries. In some countries, the anti-corruption laws have global application – for example the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act 2010. The primary focus of these laws is to prohibit improper inducements to ‘foreign’ Public Officials or in connection with international business transactions. However, the laws of many countries also prohibit the bribery of ‘domestic’ Public Officials. Moreover, numerous countries have adopted ‘commercial’ bribery laws which in essence prohibit the offering, promising, or giving to persons in the private sector of any inducements or reward for the improper performance of any function or activity. The request for, agreement to receive, to acceptance of any such inducement or reward is also prohibited.
- 7.2 Specifically, the FCPA and Bribery Act have wide territorial application, but they are not unique in operating in an extraterritorial basis. Pursuant to the Bribery Act, all UK citizens, persons who are ordinarily resident in the UK, as well as companies and partnerships which are incorporated or formed in the UK, may be prosecuted in the UK for bribery offences, even if those offences are committed wholly outside the UK. Furthermore, if employees, workers or contractors commit a bribery offence anywhere in the world, the Securitatem Group may be prosecuted in the UK courts for failing to prevent the bribery from occurring. Similarly, all US citizens are subject to prosecution under the FCPA, even if the bribery offence occurred entirely outside of the US. The nationals of other countries may also be prosecuted under the FCPA if the conduct amounting to the bribery offence has a connection with the US. Under US law, any member of staff who commits a bribery offence contrary to the FCPA will also expose the Company to the risk of prosecution.
- 7.3 Employees, workers and contractors are not expected to become experts in the anti-corruption laws applicable to them. They should, however, be aware of the circumstances when corruption concerns may arise as a result of anti-corruption laws of their own and other jurisdictions and adjust their behaviours accordingly. If in doubt, seek guidance.

8. Risk Assessment and Procedures

- 8.1 The Securitatem Group may carry out a risk assessment to identify and prioritise anti-corruption risks. This includes an evaluation of the jurisdictions in which the Company operate the markets for its particular services, the extent to which it uses third parties to act on its behalf, and the degree of interaction with Public Officials. The Company will develop its policies and procedures based on its evaluation of those risks, which shall be approved by Directors.
- 8.2 Risk assessments will be reviewed periodically and whenever there is a significant change to the Company's operations, business activities, geographical reach, or applicable legislation. Where risks are identified, appropriate mitigation measures will be implemented and monitored.

9. Compliance

- 9.1 By signing the annual Policy Acknowledgement Form, employees/workers/contractors are confirming their understanding and acceptance of this policy. If it is found that they are failing to comply with this, disciplinary action may be invoked up to and including termination.
- 9.2 The Securitatem Group maintains a reasonable system of internal controls to prevent any improper or corrupt payments and ensures all financial transactions are accurately and fairly recorded in relevant digital and other Company records. Employees, workers and contractors who contravene any applicable anti-corruption laws may expose the Company and themselves to significant criminal and/or civil sanctions. Such failure may also be reportable to and/or give rise to disciplinary action by professional bodies regulating staff.
- 9.3 The Company maintains a Gifts and Hospitality Register in accordance with the Gifts, Hospitality and Entertainment Policy. All reportable gifts and hospitality must be declared and recorded to ensure transparency and compliance with this policy.
- 9.4 The Company provides periodic anti-bribery and corruption awareness training to employees, workers and contractors whose roles present an increased risk of exposure to bribery or corruption.
- 9.5 Any employee who wishes to complain about their treatment under this policy should do so by means of the Grievance Procedure. Any issue experienced by a worker/contractor should be brought to the attention of the Operations Director for resolution.

10. Review

- 10.1 The effectiveness of this policy and associated arrangements will be reviewed annually, or sooner where there is a significant change in legislation, business operations, organisational structure or identified bribery and corruption risks. The review will consider the effectiveness of existing controls, any reported incidents, risk assessments and relevant legislative developments. All reviews and amendments will be made under the direct supervision of the Securitatem Group's CEO.

Group CEO:

Joseph McGee

Policy reviewed: 14/07/2026