



BUSINESS ETHICS CODE



3	The Right Way
4	Our Values. Our Culture, Our Code
5	Using the Code
7	Speak Out
8	Complying with the law
	The right way for our people
9	Health & Safety
10	Diversity, Equity & Inclusion
11	Bullying & Harassment
13	Drugs & Alcohol
	The right way for our business
14	Anti-bribery & corruption
15	Gifts & Entertainment
16	Political Contributions
17	Conflicts of interest
18	Competition
19	Financial Integrity
20	Anti-Fraud & Dishonesty
21	Anti-money laundering & counter terrorist financing
	The right way for our world
22	Human rights
24	Our environments
25	Our customers
26	Our suppliers
27	Our communities
	The right way for our information and assets
28	Confidential information
30	Social Media
31	Our brand and intellectual property
32	External communications
33	Implementation



Ashley Almanza
Executive Chairman
Allied Universal® - International

Our customers and millions of people around the world rely on us to keep them safe and secure. It's a critical role and one that we are proud to fulfil. It's also one that comes with significant responsibilities.

Keeping people and their assets safe and secure requires not only the right training, it also requires high levels of trust. This trust is earned by us always behaving in line with the law and our policies and procedures. Put simply: by doing business in the right way.

Doing business in the right way will not only build trust but will also ensure that we have a culture where people feel respected, included and able to perform to their best, ensuring that we are successful.

This Business Ethics Code (the Code), explains what we mean by doing business in the right way for all people whose lives we touch – our customers, our employees and the communities in which we live and work. How we do things is as important as what we do and there is always a right way to achieve a successful outcome. The Code is designed to help you with your decision making, or when facing new challenges and will help you to always do business in the right way.

We have a zero tolerance policy when it comes to non-compliance with our Code and I encourage you to speak out if you see conduct which does not comply with it. We are listening, your calls and reports will remain confidential and we will respond appropriately.

We believe in doing business the right way. We have clear values that set us apart in the industry and we take time to ensure that they are embedded in all our systems, policies and processes. Together with this Code our values govern our behaviours and how we interact with each other, our customers, and those in our care. Our values underpin and shape our culture.

- The Code provides an overview of our key policies and our commitment to doing business in the right way.
- The Code applies to everyone who works for any entity within the Group in whatever capacity and at any location. This includes contractors, consultants and agents working on our behalf. We also require the Code to be applied and complied with by our suppliers and any joint venture partners even where we do not have operational control.
- In addition to the responsibilities we all have to comply with the Code, page 6 sets out the additional responsibilities and accountabilities that apply to all managers and business leaders.
- The Code offers guidance on how to make the right business decisions. Although it is not possible to capture every situation that you may face, the Code does include examples of some of them. These will help you to check your understanding of the right way to respond.
- If you need more guidance and information, relevant policies and standards are identified in each of the sections. If you are still not sure, ask your line manager for guidance.
- Page 7 on Speak Out explains how you can raise any concerns about behaviours that are not in line with our values or this Code in a confidential way. Don't hesitate to use Speak Out and encourage others to do the same if they too have concerns.

You

It is vital that everyone who works for the Group knows about this Code and understands that it is your responsibility to:

- Learn our values and behave in line with them each and every day
- Complete all mandatory training that is relevant to your job
- Raise questions if you are unsure about the right decision to make in any situation
- Do the right thing and follow this Code - always - with no exceptions
- Report any concerns about behaviour that is not in line with our values or the Code
- Co-operate fully and honestly during any investigation

Managers

Managers have additional responsibilities to:

- Ensure everyone in their team, regardless of their length of service, learns our values, understands the Code and knows how to apply it in their role
- Ensure that our suppliers and subcontractors act in a manner consistent with the Code, such as by including the Code in contracts where applicable
- Lead by example and always do business in the right way and challenge anyone who isn't doing the same
- Ensure mechanisms for raising concerns, including via Speak Out are widely and regularly publicised. Encourage people to raise their concerns and protect them from any retaliation from colleagues when they do
- Respond positively and promptly to any allegations of potential breaches to the Code
- Follow up on any lessons learnt to ensure that issues raised can't occur again

We must always choose the right way of doing business even if in the short term there are fewer benefits to doing so. If you are not sure ask yourself whether what you are doing or the decision you are making:

- Follows the law?
- Complies with our values?
- Complies with our Code?

If the answer to any of these questions is 'No', then it isn't the right way. We don't want to do business at any cost and we will walk away from customers, suppliers and contractors whose values and practices don't match our own.

If employees breach our Business Ethics Code we will take action including disciplinary sanctions and criminal proceedings if appropriate.

We each have a duty to challenge any instances where we feel actions, behaviour or decisions undermine our values or our Code. Reporting them is the right thing to do and will help ensure we can protect our customers, our employees and our reputation. We are open to this feedback and have made it easy to raise any concerns by ensuring that you can provide it in a variety of ways.

- **Option 1** – discuss your concerns with your line manager.
- **Option 2** – raise your concerns with a member of the HR team.
- **Option 3** – use Speak Out, our confidential reporting line.

If the matter relates to local issues such as your work roster, uniform or pay queries, then raising your concerns via options one and two are more likely to ensure that the matter is resolved quickly. The local team has the information to hand and more knowledge of the situation to provide help.

Speak Out is the name that we use for our independent whistleblowing service. For T.S.S. (Total Security Services) Limited (“**TSS**”), reports may be made via **tss.ethicspoint.com** or telephone to **0808 196 8164**. Concerns will be passed on to a member of the Speak Out team who will contact the individual to confirm the details of their concerns.

You can raise any concerns in confidence and they will be treated sensitively, with information being shared only with those who need to know for investigating and managing it. Where possible updates on the status and on the outcome will be provided.

Anyone reporting a concern will be protected by the Group. Harassment or any pressure placed upon employees who have raised concerns or provided information to an investigation will be treated as retaliation and dealt with as a breach of this Code. For more information, see the Whistleblowing Policy.

We will always comply with the laws and regulations.

As a company whose reputation is built on trust and whose employees protect customers and communities from crime, we work hard to uphold the law. Breaking the law harms our business, destroys trust and ruins our reputation.

Working globally in more than 80 countries, laws vary and it is impossible in this Code to list them all. In some countries local laws or specific security industry standards are more stringent than our global policies and standards. Wherever that happens we will comply with the stricter requirements in addition to this Code.

In other countries the Code reflects the local laws so not following it means you may also be breaking the law. As well as facing disciplinary action you may also face fines and imprisonment.

Always do the right thing and follow the Code.

THE RIGHT WAY

Always complying with the laws and regulations is the right way to do business.

Never take any action either on your own or on behalf of the Group which breaks the law.

Ensure that the Group's operating procedures, financial standards and policies are always adhered to. Following them will help you stay within the law, particularly on matters such as use of force, and searching and preventing access, where the difference between the right and wrong way may not always be that obvious.

If you see or hear something that might be a breach of the law or this Code, always report it to your line manager or, if that is not possible, via Speak Out. Don't leave it for someone else to do.

If you are ever unsure about the law or any conflict between the Group's or TSS's policies and the local legislation, ask your line manager for guidance.

What would you do?

It is a legal requirement in our country to pay for security permits for our business. The requirement isn't enforced by the government and we don't think our competitors have them. Do we have to do this?

Answer: Yes. You must always comply with the law. Without exception and regardless of the behaviour of other companies.

In line with our values, we are passionate about working safely and protecting our customers and colleagues from harm.

Every company within the Group, contractor and joint-venture business regardless of whether it is under the Group's operational control must comply with our health and safety management systems and policies.

Business unit leaders are responsible for putting health and safety at the forefront of their day-to-day activities. This means ensuring systems are in place to identify and address risks, consultation on health and safety matters takes place and appropriate health and safety training is delivered. It also means they must complete investigations into any incidents and near misses and review the health and safety performance of the business to continuously drive improvements.

We believe all workplace incidents are preventable and will not stop our continued focus and efforts until we achieve our goal of Zero Harm.

We provide training, safety equipment and procedures that help protect you. Following the procedures and using the equipment provided is mandatory.

THE RIGHT WAY

Always complying with health and safety laws, customer requirements and the Group's / TSS's health and safety standards and policies is the right way to do business.

To help us reach our goal of Zero Harm we need everyone to:

Take responsibility for safety. It starts with you

Follow the Group's Golden Rules of Safety and any others that apply to the job you do

Firearms users must adhere to the firearms safety rules

Always ask if instructions or procedures are not clear and seek help if you need it

Use the right tools for the job and do the job in the right way

Always report any incidents or safety concerns

Assist with investigations and safety inspections and audits

What would you do?

I've noticed that an entry gate to the compound which I patrol is not working properly. The bottom hinge is broken and the gate is too heavy to lift without help. I've reported it to the customer who told me it was being fixed. That was six months ago and nothing has happened. The hinge looks like it will break soon. Should I report it again?

Answer: Yes, ask your supervisor or manager to speak with the customer as soon as possible. A falling gate can cause serious injuries, not just to you but to other people walking past. In the meantime try to find a safer way of working. Document what you have noticed about the gate during your patrols and always report any safety concerns.

What would you do?

One of my co-workers fell over at work today. She was taking an illegal short cut across the railway line to get to the guard office and got her foot caught in the tracks. She hurt her ankle but doesn't want to report it because she says her ankle will mend. Should I report it?

Answer: Yes, your colleague may need medical treatment for her injuries. We need to learn from all incidents and find better ways of doing things because next time the injuries may be more serious. You should always follow your operational procedures and report all incidents in line with our Golden Rules of Safety.

Our success depends upon us having employees who are as diverse as the world in which we operate and who are able to perform to their best. In order to achieve this we need to recruit people with different backgrounds and provide them with equal opportunities to progress and grow.

Any recruitment, promotion and development decisions will be based on objective criteria related to things like skills, abilities and job performance, and never based on any unlawful factors.

We will treat you fairly and with respect and we expect those with whom you come into contact during your work to do the same. This includes our customers, our suppliers and any other third parties. If this is not your experience, raise the issues with your line manager.

At the same time, we will not tolerate instances of unfair discrimination from our own employees and will use the disciplinary procedure if evidence indicates this is happening.

THE RIGHT WAY

Always behaving in a way which recognises the value of diversity and demonstrating inclusive behaviours is the right way to do business.

This means being open to new ideas, listening to suggestions and welcoming different points of view regardless of where they come from.

Never discriminate against people based on personal characteristics such as their race, colour, ethnic origin, age, nationality, disability, gender, sexual orientation, gender identity, marital status or any other characteristic protected by local legislation.

Anyone involved in decisions affecting the employment or care of others is required to attend training to ensure that they understand their responsibilities and legal obligations to make decisions that are objective and fair.

Promote inclusion. Learn about and value people's differences in whatever form they take. Their differences are what make them unique and the Group successful.

Challenge any unacceptable or inappropriate behaviour so it can be addressed, and use your line manager or Speak Out if this is difficult to do face to face.

What would you do?

A customer has asked me to recruit two extra male security officers for the site, even though there's nothing about the role that genuinely requires only male officers. I've explained that we don't discriminate and always recruit and select people based on suitability for the role and not their gender but I'm frightened we'll lose the contract if female security officers are chosen.

Answer: We will not breach discrimination laws to get or keep any business. We always appoint the best people for the job regardless of their personal characteristics.

What would you do?

I have asked to attend some management training but have been rejected on the basis of my disability which has no bearing on my job performance. Is this fair?

Answer: No and you should appeal to your line manager and if this is not possible via Speak Out.

Our caring culture means it matters to us that the working environment is free from bullying and harassment and all our colleagues and people with whom we interact at work are treated with dignity and respect. Any behaviours which undermine this culture and create a hostile, intimidating and offensive environment will not be tolerated.

Harassment and bullying can be directed to an individual or be against groups. Often, but not always, harassment and bullying is in relation to a characteristic protected by local law (such as sex, race, colour, ethnic origin, religion, disability, age, gender, sexual orientation, marital status, gender identity). Examples of harassing and bullying behaviours are shown (but not limited) to those below:

Verbal - name calling, innuendo, jokes and purposely misgendering people

Non-verbal - excluding people from meetings, calls, events or projects, using gestures, whistling, displaying or sending offensive or inappropriate images and graffiti

Physical - such as touching, pinching, patting and coercion or violence, whether actual or threatened

Bullying - persistent inappropriate criticism, shouting, ridiculing and undermining someone either in private or public. It often involves the abuse or misuse of power.

In addition, victimisation is also seen as contrary to our policies, this Code and our values. Victimisation is where someone is treated less favourably than others in the same or similar circumstances, because they have made a complaint of discrimination, harassment or bullying or have been involved in the investigation of a complaint. Victimisation can take any form such as denying a training opportunity, rejecting holiday requests, or blocking promotions, or similar type behaviour.

If there is evidence that harassment, bullying or victimisation has occurred we will use the disciplinary procedure to take action and where necessary, support the use of criminal prosecution. We will investigate concerns raised and take matters seriously.

We expect our suppliers and subcontractors to adopt the same approach.

Being aware of how your behaviour affects others and showing respect towards colleagues, customers and those in our care is the right way to do business.

Be aware of cultural differences and understand that behaviours that are acceptable in one culture may not be in another.

- Never make inappropriate jokes or comments
- Do not display, distribute or share offensive material in any format including via email, social media or post.
- Never make threats of violence
- Be an ally for others and challenge and report behaviours which are not in line with our policies, this Code or our values.

If you personally are subjected to harassing or bullying behaviour, try and raise this with the person concerned in the first instance to let them know that their behaviour is unwelcome, offensive and must stop immediately. If this is not possible, raise your concerns with your line manager, HR department or via Speak Out at the earliest opportunity.

Anyone who reports a case of discrimination, bullying, harassment or victimisation will be listened to and the matter taken seriously. Cases will be treated in confidence and will be investigated without delay with instances of potentially criminal behaviour being shared with the police. Support will be offered for employees where appropriate and in line with local policies and good practice.

What would you do?

At the site where I work the customer and my colleagues use abbreviated names for me, which are rude and they know I dislike. Should I report this or just accept it as workplace banter?

Answer: You should report it to your supervisor or via Speak Out. We will not tolerate any form of harassing behaviour that undermines the dignity of others at work.

What would you do?

My manager keeps asking me out on dates. I have told my manager I don't want to go but it is getting awkward for me. Shall I just leave?

Answer: No, you should report it straightaway to another manager or via Speak Out so that it can be investigated. Any kind of unwanted and inappropriate behaviour like this is completely unacceptable.

We have a zero tolerance approach to the abuse of drugs and alcohol as it impacts our ability to keep people safe.

We recognise that our employees do exceptional work often in challenging environments and want to ensure that in return we support them when they have problems which are related to drugs and alcohol.

Nevertheless, we will not tolerate the use of illegal substances and we will take action if there are risks arising from people's behaviour because of substance misuse or abuse.

We expect other organisations that we work with such as suppliers and subcontractors to comply with our rules on drugs and alcohol just as we will do for any customers whose sites we operate on.

THE RIGHT WAY

Making sure we are ready for work every day is the right way to do business. This means being well rested and never reporting for work under the influence of drugs or alcohol.

It is one of the Golden Rules of Safety that drivers do not undertake any driving duties while under the influence of drugs or alcohol.

Consuming alcohol on company premises is not permitted unless it is a company sponsored event and you are of an age where it is lawful.

Colleagues are required to co-operate with any requests to undergo random drug testing where it is a contractual or legal requirement to have them.

If you suspect that a colleague is putting their health and safety or that of others at risk, challenge them directly and if that is not appropriate or possible raise it with your line manager.

If you need help with a substance misuse problem, raise your concerns in confidence with your line manager or a member of the HR team. This will allow us to support you and consider any mitigating circumstances if your performance is affected or company standards have been breached.

What would you do?

I have noticed a security officer arriving for work in the morning. Her speech is slurred and she is unsteady on her feet. Should I say something?

Answer: Yes, before she puts herself or her colleagues at risk. If you are not able to speak with her directly, raise your concerns with her supervisor.

What would you do?

My colleague is having a difficult time. His mother died recently and two days later his brother was killed in an accident. He's taking sleeping tablets but is now acting out of character. Twice in the last week he's been late for work, his eyes are bloodshot and he has started shaking and responding aggressively to comments or questions. Should I say anything?

Answer: Yes, you should first try and discuss what you have noticed with your colleague. If you are not able to do that, raise your concerns with his line manager to ensure that he gets support and any issues are addressed before they escalate.

The payment or receipt of a bribe in any form is forbidden.

We will always compete on merit, win business fairly and work with reputable customers and suppliers. Not doing so risks our reputation, undermines the trust of our stakeholders and may expose the company and the individuals concerned to criminal prosecution.

Regardless of local laws and customs, we must never pay or receive bribes.

Facilitation payments made to government officials to get them to do something are also seen as bribes and are forbidden. It doesn't matter how small the amount is or whether the company has benefited from the facilitation payment being made. Such payments are wrong.

The rules apply directly to everyone in our business as well as to those who act on our behalf such as agents, consultants and our business partners.

Employees found to have been involved in bribery or any form of corrupt practices will be subject to disciplinary action and may also face criminal charges.

Employees or anyone acting on the company's behalf, may not offer, make, promise, request or accept a bribe; provide or accept a kickback; or otherwise provide or accept any improper payment, gift, favors or other item of value in connection with the company's business.

THE RIGHT WAY

Always complying with the anti-bribery laws of the country as well as those which apply internationally is the right way to do business.

Never offer or accept a payment or any inducement to influence a business outcome.

Speak out if you become aware of any suspected bribery or fraud.

Check that our suppliers, contractors, agents and any other third party providing services to or on behalf of the Group, are reputable and committed to upholding our ethical standards.

Exception

The personal safety of our employees is our highest priority. If any payments are demanded to protect colleagues from harm, employees must confide in the company and let the company and the authorities take the appropriate action.

What would you do?

On checking the delivery note for a consignment to a customer, you notice that there are three bags missing. When asked about the shortage, the delivery driver immediately offers you some money in exchange for not saying anything. Should you accept the payment?

Answer: No, the payment being offered is a bribe and accepting it would breach our values, our Code and possibly the law. You should decline the money and call the site supervisor.

What would you do?

A senior police officer is holding two company vehicles for apparent parking violations. He's asked for a payment in return for their early release. Surely this is acceptable as it's impacting on the business?

Answer: No, making such a payment would be seen as bribing a public official. Under no circumstances should the payment be made. If available, ask for details of the appeals process instead.

No employee is permitted to give or receive gifts and hospitality which may influence the person receiving it to act improperly.

We want to be transparent in all our dealings and only use gifts and hospitality in a way that fosters good working relationships and helps build better business understanding. Giving or receiving gifts (such as promotional materials), engaging in business entertainment or paying for business travel and meals, may help achieve this but it can also create conflict and be open to abuse, so only offer or accept it where it is:

- Lawful, consistent with normal business practice in the relevant country and not offensive or indecent in any way
- Not excessive in value and appropriate to the occasion
- Only applicable to individuals involved in the business (not partners or spouses)
- Not open to misinterpretation as an inducement or something that is likely to influence business transactions, particularly if a procurement decision is pending
- Approved and recorded in the gift register
- Given or received on an occasional basis

THE RIGHT WAY

Always behave in the right way and follow the guidance in the Gifts and Entertainment Policy.

This means:

- Never directly or indirectly, offer or accept gifts of cash or cash equivalents such as vouchers, personal cheques, prepaid cards etc.
- Discouraging gifts and entertainment from suppliers. Do this at the outset of the contract to prevent embarrassment later on
- Returning gifts, other than ones with a low value and doing so promptly with a letter of thanks and an explanation. In a culture where such an action might cause offence, the gift should be declared to the company. It may be donated to charity or shared with colleagues in the wider business
- Speaking out if you have any concerns that gifts or hospitality are being offered or received inappropriately

What would you do?

I have been invited to a major soccer tournament as a guest of one of our suppliers. They invite me every year but this year they have said I can bring a member of my family or friend too. The contract is up for review and we start renegotiations next week. Is this okay?

Answer: No, with the contract negotiations starting it could be seen that this hospitality influences your decision. Nor should you take anyone unrelated to work to such events. Politely decline, thanking the supplier for the invitation and explaining that it would be inappropriate for you to attend.

What would you do?

You have received a small box of cookies at New Year from a local recruitment supplier who has been involved in a number of appointments. They are worth about \$5 and are a traditional offering at New Year. Should these cookies be returned or is it okay to keep them and share them with colleagues?

Answer: It is acceptable to keep small gifts of nominal value that are not going to influence your decision to use a particular supplier. Always be transparent about any gifts received with your line manager and thank the supplier promptly. Gifts worth more than £100 must be reported in the gift register and will need to be returned. If that would cause offence, they should be donated to charity.

No employee is permitted to use any company resources such as money, time or equipment to support political parties, campaigns or candidates.

We seek to understand the political agenda and input to wider party politics if our views as an employer are sought, or where it is relevant to our industry or business. Any input will only be by individuals authorised to speak on behalf of the Group.

We believe that everyone should be free to engage in or support lawful political activity with their own money and in their own time. To protect the Group and its reputation however, we require colleagues to keep their actions outside the Group clearly separate to their role within it.

No one should feel pressured to contribute, commit to or support a political party, a candidate or a political viewpoint.

Political contributions of any kind by the company must have International board approval.

Employees are ambassadors for the company and represent our brand. When they engage in behaviour in or outside of work which is against this Code and may bring the company into disrepute, we will investigate and take any necessary action.

THE RIGHT WAY

Always be clear that any political views you express are your own and not those of the Group unless that is the requirement of your role.

Respect the political views of others even if they don't match your own.

Notify your line manager if you are standing for any public office so that they can discuss and advise you on any potential conflict of interest.

Report any concerns that you have about being pressured to participate, contribute or commit to any political party or activity, or feel you are being treated unfairly for not doing so.

What would you do?

A colleague of mine belongs to an extremist organisation. He's not open about his views but I have overheard him saying to colleagues that only people born in this country have a right to work here and that a number of them should 'go back to where they came from'. They just ignore him so should I say anything?

Answer: Yes you should raise this with your line manager or via Speak Out if this is difficult. If an employee's political views impact on their workplace behaviours, the Group will act. Racist, sexist or any other behaviour or language which is offensive to others will not be tolerated.

What would you do?

I'm using my social media profile to help raise awareness of a political candidate. Is this okay as it's in my own time and there's no mention of my job on my profile?

Answer: Yes, so long as there is no mention of the company within it, and you do it in your own time.

No employee is permitted to allow financial, personal or social activities to interfere with commitments to the Group. Every employee has a duty to protect and enhance the Group's reputation and the trust of our customers and suppliers.

We encourage our employees to be active in their local communities, via government and charitable organisations which matter to them. At the same time any situation which presents a conflict of interest, even a potential one, must be avoided.

This Code cannot describe every potential conflict of interest but the list below describes some of the most common ones:

- Having a second job outside of the employee's job in the company
- Running for or accepting an appointment to a political or government office
- Having a close family member working in the Group in your managerial line, or being in a personal relationship with someone who is
- Having any personal interest, dealings or shareholdings in any business which is either a competitor, customer, supplier, Group business partner (actual or contemplated), or regulatory body.

THE RIGHT WAY

Using good judgement to make decisions without consideration of any personal gain is the right way to do business.

Always act with independence, impartiality and integrity. Reject any business practice which might reasonably be deemed improper, (including improper practices which might benefit the Group).

If you are not sure whether the situation is going to be a conflict of interest with your role in the company, ask yourself if you would be embarrassed if this situation was reported in the media or to your manager and whether you would find it acceptable if it was your business?

Always disclose any potential conflicts of interest to your line manager and obtain written approval before acting.

Comply with our gifts and entertainment guidance (see page 15) and our Supplier Code of Conduct (see page 26). Report any concerns about conflicts of interest that you become aware of to your line manager or via Speak Out.

What would you do?

I have a second job working in the evenings and at weekends in a bar. I need the money and it doesn't impact on my work in the company other than sometimes I am late in the mornings and by the end of the week I am very tired. Surely this is okay?

Answer: No this is not okay. Your second job is impacting on your performance for the company making you late and very tired. You will need to talk to your line manager before this issue escalates as your career within the company and your health and safety could be at risk.

What would you do?

My brother works as a sales manager for a major competitor of the Group. He lives hundreds of miles away and we rarely speak. Do I need to disclose this?

Answer: Yes. It is really important to disclose any potential conflicts of interest, even the appearance of one. Explain the situation to your line manager who will review any confidential information you have access to and outline any action needed to protect you from a conflict of interest.

We have a zero tolerance approach to sharing competitor information or agreeing to fix prices.

We are a leading security solutions provider. We want to compete in a fair and ethical way. That means winning business based on our ability to provide excellent service and products that offer the best value in the marketplace.

We will comply with all applicable competition laws wherever we do business.

We will only use competitor data that is obtained in lawful and ethical ways (whose sources have been recorded) and we will never seek to get it from their former employees.

We will be careful in all our dealings with competitors and will limit our contact with them, avoiding social and informal conversations where there is no fixed agenda or minutes kept.

We will not divulge company sensitive information on matters such as pricing, contracts, markets and strategy to competitors, business partners or any other third party and will make decisions on strategy, customers, markets and prices alone.

THE RIGHT WAY

Never enter into any inappropriate discussions with competitors.

Never enter into any agreements, however informally, that unreasonably restrict competition. This includes:

Agreements with competitors to charge customers the same price (price fixing), reduce competition in bidding (bid rigging), or divide markets or service territories (market allocations).

Agreements not to sell to or buy from competitors (boycotts)

Requiring a customer to buy an item or service as a condition to buying another item or service (tying).

Never discuss any confidential information about the company with competitors or seek any from them. Be particularly careful at industry forums and avoid any informal meetings where representatives from competitors are present.

If you have any concerns about competition then raise them with your line manager and if that isn't possible, via Speak Out.

What would you do?

After a meeting with several competitors, we agreed to go for a quick lunch. The topic of business acquisitions came up and they started talking about their expansion plans. I excused myself and left the meeting. Was I right to do so?

Answer: Yes, you did the right thing. Never enter into any conversations about confidential business matters with competitors. If you are not sure, always leave the meeting or the call.

What would you do?

I recently joined the company from a senior position with a competitor. During meetings on our plans and strategy, I have been asked several times about the approach that my previous employer was taking and their pricing on some services. Is this right?

Answer: No, you should not be asked to divulge or discuss competitor information. You should raise this with your line manager and if there are any further similar requests for you to divulge competitor information raise it via Speak Out. It is in breach of our values, our Code and may also be unlawful.

We require employees to fully adhere to our accounting procedures and standards.

We take time to ensure they are up to date and that people understand and know how to implement them so that our financial transactions are appropriately authorised and accurately recorded. This is necessary for good governance and good decision making.

In bids and tenders we will be honest about any costs and prices and always make accurate disclosures in line with contractual requirements.

We will comply with all anti-money laundering laws and regulations and ensure we are not inadvertently supporting criminal or terrorist activities.

We treat any form of deception used to obtain an advantage or personal gain, avoid an obligation or deprive the Group, its staff, customers suppliers or other parties of property or other rights as fraud. This includes dishonest accounting practices such as tax evasion and misrepresentation of management information for personal gain to the perpetrator or a third party.

THE RIGHT WAY

Providing accurate, timely and complete financial records is the right way to do business.

You must familiarise yourself with all of the Group's financial policies and standards applicable to your role.

Never do anything to adjust, conceal, mis-allocate sales or profits between reporting periods.

Record all transactions accurately and completely and retain the details for audit purposes.

Co-operate fully with any investigations or requests for information from internal audit or external regulators.

Be alert to potential money laundering activities such as unusual tariffs or multiple transactions for a single invoice.

Always report any concerns about financial inaccuracies or fraudulent activity to your line manager and if that is not possible via Speak Out. Never leave it for someone else to report.

What would you do?

A local supplier of ours has asked us to pay them via a bank account in another country, saying this will give them a favourable tax treatment. This would help our relationship with the supplier, who has offered us a discount if we pay them this way. As it is saving the company money should I proceed?

Answer: No, you should check this with your line manager or the Tax department. The supplier may be seeking to evade tax, and we should not be involved in facilitating that as this behaviour is not consistent with our values. In certain countries including the UK this could also have very serious financial implications for the company.

For more information, see the Tax Policy and Anti-Fraud & Dishonestly Policy.

We require employees to fully adhere to our Anti-Fraud & Dishonesty Policy.

Any employee who uncovers or suspects alleged fraud or an act of dishonesty (or their senior manager within the Business Unit, if made aware) must report the attempt, whether or not it was successful, via Speak Out.

Generally the term "Fraud" is used to describe acts such as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation or concealment of material facts and collusion which results, directly or indirectly, in financial or personal gain to the perpetrator, the group, a group company or a third party.

For the purposes of the policy, fraud is defined as: "The use of deception with the intention of obtaining an advantage or personal gain, avoiding an obligation or depriving the Group, its staff, customers, suppliers or other parties of property or other rights."

For the avoidance of doubt this definition includes deliberate misreporting or misstatement of information for personal gain to the perpetrator or a third party.

THE RIGHT WAY

If an alleged fraud or an act of dishonesty is uncovered or suspected, the person who uncovers or suspects the fraud (or their senior manager within the Business Unit, if made aware) must report the incident, whether or not it was successful.

The Business Unit (BU) must report the incident, via Speak Out. If an individual has concerns about a Fraud or an Act of Dishonesty, this can be reported confidentially using Speak Out.

The Finance Director (FD) / Managing Director (MD) of the BU must also independently advise The Regional MD and the Regional FD of the fraud or dishonesty. This report should include details of loss of assets, if any.

The BU must attempt, where practical, to recover all losses using civil and/or criminal remedies and report such attempts to the local Police. The BU and Region must identify corrective action(s) which can be taken to prevent similar losses occurring in the future.

What would you do?

Daniel has prepared the monthly performance report for the client. When his line manager checks the report, she asks him to increase some of the lower KPI scores because they may give the client a poor impression of the company. What should he do?

Answer: Refuse to make the change and escalate the matter to the business unit quality/compliance lead in order that they can inform the business executive.

What would you do?

A subcontractor engineer has visited a client's site to carry out a maintenance activity. The engineer telephones the FM Manager to confirm that the work has been completed, but does not provide documented evidence to show this. The manager is required to provide a monthly bill, which should include deductions for incomplete maintenance tasks. What should the manager do?

Answer: Obtain the evidence from the subcontractor and if necessary inform the client if there is likely to be a delay.

For more information, see the Anti Fraud and Dishonesty Policy.

We have a zero tolerance approach to any criminal actions or omissions including money laundering or terrorist financing.

Anti-money laundering (AML) and counter terrorism financing (CTF) laws seek to prevent the financial system from being used for the purpose of laundering the proceeds of crime or the financing of terrorism, and to stop entities or individuals from hiding, benefiting from or facilitating money laundering or the financing of terrorism.

The scope of AML laws can include concealing, disguising, converting or transferring the proceeds of crime or removing the proceeds of crime from a country, acquiring, using or possessing the proceeds of crime or aiding, abetting, facilitating or procuring such activities. AML/CTF laws may extend not only to those companies and individuals who are intentionally breaking the law, but also to legitimate businesses who handle the proceeds of crime.

We will comply with all applicable AML and CTF laws and regulations.

THE RIGHT WAY

Advice should immediately be sought from your line manager and the legal department if any demand or request is received from a law enforcement agency in connection with money laundering or terrorist financing by a customer or third party. This will enable the Group to co-operate with law enforcement agencies in accordance with applicable laws.

It will also enable the matter to be investigated further, which may result in us turning down further business from the customer.

Do not 'tip off' customers or third parties if you become aware that law enforcement agencies are conducting an investigation into suspected money laundering or terrorist financing, as this could itself be a criminal offence.

What would you do?

The police inform the company that they are investigating one of our customers for suspected money laundering and they request confidential information about previous transactions. Should I comply with the police request? What should I tell the customer?

Answer: You should immediately report the request to your line manager, who can consult with the legal department and ensure that the company co-operates with the police investigation in the appropriate way and in accordance with applicable laws and policies. Where grounds for suspicion exist, we may decide not to provide further services for the customer.

Do not inform the customer about the police investigation, as this could assist them to evade law enforcement and could be a criminal offence.

We require employees to always respect the human rights of others.

Human rights are the basic rights and freedoms that apply to everyone in the world from their birth to their death.

As a large scale security group operating across the world we have to be vigilant in looking out for human rights abuses. They can be complex and hidden. They include modern slavery, unnecessary or illegal use of force, mistreatment of detainees, restricting freedom of movement and criminal and sexual exploitation.

We are committed to respecting human rights and will use our influence and geographical reach to protect them through the work that we do. There are no circumstances in which human rights abuses are acceptable. At any time or in any place.

We will continue to support the United Nations Declaration of Human Rights and the core conventions of the International Labour Organisation. This means:

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

- Employment will be freely chosen with no forced or child labour
- We will not tolerate discrimination in any form
- We will not be party to the use of excessive or illegal force

Human rights abuses are not an historic problem or one that only happens in some developing countries. Abuses can happen anywhere and in any organisation. We have to be particularly careful where:

- Employees are working as economic migrants and are more vulnerable to exploitation
- We use third party suppliers and subcontractors whose standards may not be as high as our own
- We are delivering services in places where abuses may be happening

We will continue to embed our human rights policies and use our knowledge and expertise to identify and prevent abuses. We ask all employees to help us do this.

We must always respect the rights of others and look out for any situation in which people may be vulnerable to human rights abuses.

There are three main ways in which a business can be involved in the violation of an individual's human rights:

- Directly, by abusive actions or policies
- By actively colluding with or supporting the violation of rights by states, partners, customers or other parties
- Indirectly, through its links to subcontractors or suppliers which abuse human rights as they support or act on behalf of the Group

Working on the front line in places like airports, factories and job centres means you may spot abuses like human trafficking or exploitation. Always report any suspicions about potential abuses to your line manager or via Speak Out so that we can investigate.

We are proud of the important work that our employees do and we will walk away from business where our employee's rights are not being respected.

Before embarking on any contract, carry out due diligence on customers, suppliers and subcontractors to check for evidence of current or past human rights abuses. Reject the contract if you find any. We do not want to work with organisations that abuse the rights of others.

Respect employee rights to join or to form a trade union and to request collective bargaining in line with local regulations and our Ethical Employment Partnership. Where no such arrangements exist provide alternative processes for effective employee consultation and communication with management.

Work must be freely agreed with documented terms made available. Never use forced, illegal or child labour (i.e. individuals under the age of 15 or under the local legal minimum working age or mandatory schooling age, whichever is the higher). All front line security officers must be at least 18 years old.

Some countries do not have a good record on human rights. If looking to bid for work in a country where the Group does not currently operate, you must check with International Executive Committee members first, even if the proposed contract is aligned to humanitarian aid.

Always comply with any external legal requirements on wages and employment terms (including for casual and agency employees) and comply with internal policies on human rights, firearms safety and migrant workers.

What would you do?

I am a migrant worker and have just arrived in a new country to take up my job with the company. My passport has been taken by a company Administrator and I have been told it will be returned when I leave in three years. Is that correct?

Answer: No. We will never retain your passport or any identity documents. Your passport may be required briefly in order to process visa or official documentation, but it should be returned to you immediately afterwards.

What would you do?

I work as a security officer at an airport. During the last few months I have noticed the same passenger being accompanied by different children. The children are all roughly the same age and look fearful. Should I say anything?

Answer: Yes. Well done for being alert. This may be a case of human trafficking or child labour and you should tell your supervisor or manager about your concerns.

We want to protect the environment in which we live and work and require all employees to minimise waste and be careful with resources like gas, electricity and water.

We strive to continuously reduce our impact on the environment, setting targets for any reductions in carbon intensity and the management of waste, water, vehicle emissions and energy consumption.

We will learn, share ideas and develop our approach to finding ways to more sustainable working. Where opportunities permit, we will also partner with our customers, contractors and suppliers to achieve the same.

THE RIGHT WAY

Making every effort to achieve our environmental goals is the right way to do business.

Regularly review environmental legislation.

Explore every opportunity to adopt more sustainable practices which reduce our energy and water consumption and produce less waste.

Measure environmental impact and continue to implement performance indicators which enable us to track our progress.

Protect our environment for the future. Never litter. Switch off engines and equipment when they're not in use and treat water as a scarce resource regardless of where you live.

If you have ideas on how to reduce our environmental impact share them. We are listening and would like to hear them.

Report any behaviour which undermines our efforts to safeguard our environment.

What would you do?

My colleague doesn't care much about the environment. We use diesel provided by the customer and he takes no care when he's driving to ensure he is using the car efficiently and minimising emissions. When challenged he says we shouldn't worry because the customer is paying for the fuel. Is this okay?

Answer: No, it isn't. We should always be looking to reduce our carbon emissions and protect the environment for now and for the future. We must also treat our customers resources carefully, like our own.

We value our customers and any treatment of their assets or information in a dishonest or disrespectful way is not permitted.

Our goal is to develop and enhance long-term customer relationships. At the heart of these relationships is a bond of trust and openness, honesty and transparency throughout all our interactions.

Our customers entrust us with their most valuable possessions - their people, their information and their assets. In return we commit to behaving in line with our values, to keeping them safe and secure and to ensuring our work is of the highest quality.

In the same way that we only want to partner with ethical suppliers, we look to do business with reputable customers who respect our people and share our values.

We will always comply with any trade sanctions and restrictions imposed on any country, individuals and governments.

The needs of our customers are varied. We listen and try and meet them at all times, anticipating any change in their requirements.

Helping our customers achieve their business goals by keeping them, their assets and information safe and secure is the right way to do business.

Always be truthful in your dealings with customers. Never promise what you know we can't deliver or deliver less than we have promised.

Bids and tenders must make it clear to customers if we are subcontracting or partnering with other companies in order to deliver the service.

If mistakes are made, be honest and own up to them. Quickly.

Charges and costs must always be accurate and lawful. If they aren't, we risk losing more than one customer.

Never agree to contracts with customers unless you have written approval to proceed. Some contracts require review by the Regional or International Investment Committee. If you are unsure check with your local Finance Director.

Anyone leading a bid is required to sign and confirm that the standards set out in this Ethics Code are being met as part of the bid process, and during delivery of our services.

Do not apply pressure to customers to buy our services or commit to a contract they don't want.

If we consider that a customer's interests are not well served in the long term by our proposals, make this clear even if it impacts negatively on our business.

Always report any concerns about our customer relations or contracts to your line manager or if sensitive, via Speak Out.

What would you do?

At a recent bid meeting our customer asked if we were able to offer a service in line with their specification. Although we can't at the moment we will be able to when the technology develops. Do I need to explain that?

Answer: Yes, always be truthful in your dealings with customers. Explain all of the great things we can deliver but be honest about those which we can't.

What would you do?

I process invoices for our customers and have noticed that the costs have more than doubled for one of them. This seems strange given the size of the contract hasn't changed. Should I say something?

Answer: Yes, always raise any concerns you have about invoices with the relevant account or local finance manager so that they can investigate this. Customer invoices must be accurate.

For more information, see the Contract Approval Form and Matrix.

We will only use suppliers who commit to work in line with our values and our Ethics Code.

We set high ethical standards and look for reputable suppliers who do the same. When necessary we will help them develop and reach our standards and extend them further by applying them in their own supply chain.

We have robust selection processes and use preferred suppliers wherever possible.

We discourage gifts and entertainment from suppliers and should make this clear at the beginning of any contract agreement. We do not want them to spend money on things which may add unnecessary costs and bring no value for us.

Always ensure any relationships with suppliers are efficient, fair and lawful and follow our supplier code of conduct.

Treat suppliers with respect, fairness and honesty and enable them to perform effectively. Keep the costs low by paying them on time and working to agreed specifications.

Never approve expenditure that is outside your delegated authority. If you are not sure of your expenditure limits seek guidance from the local Finance Director.

Always tell your line manager about any personal or social relationships you have with a supplier. It may compromise your ability to make fair and objective decisions and put the supplier in a difficult position.

Speak Out if you have any concerns that a supplier is not behaving in line with our Ethics Code or may be compromising our values or their own.

What would you do?

My colleague is related to the manager for a potential supplier. I don't think she has told anyone this. She has access to all of the tendering information from all of the shortlisted suppliers. Should I say something?

Answer: Yes, this is not appropriate as she could be tempted to share confidential data on bids from other suppliers. Your colleague must disclose her relationship to her line manager. If she doesn't, you should do so or raise the matter via Speak Out.

What would you do?

We are due to sign a contract with a new recruitment supplier. In their proposal they ignored our questions on human rights. We have asked them to discuss their views on human rights and confirm that they will adhere to the requirements in the Supplier Code of Conduct. They've refused and said it's not necessary. Should we proceed with the contract?

Answer: No you should terminate the contract discussions. If they are not prepared to commit to our human rights standards and will not even discuss the requirements in the Supplier Code of Conduct, we cannot do business with them.

For more information, see the Supplier Code of Conduct and Global Procurement Policy.

We care about our communities and always operate in a way that respects them.

As well as keeping millions of people safe and secure in the work that we do, we are committed to helping the communities where we live and operate.

This includes encouraging voluntary work, sponsorship of community projects and charitable fundraising for causes which are close to our employee's hearts.

We will also serve local interests by providing good employment opportunities with meaningful work and fair wages which support a reasonable standard of living for our employees and their families.

We want to work with suppliers who share our values and are also going to work in a socially responsible way, respecting the human rights of others and also contributing positively to the environment and local communities.

We will share our knowledge, expertise and resources to help raise the standards for the industry and for the benefit of our communities.

THE RIGHT WAY

Being a good corporate citizen by recognising and respecting local cultures and behaving in ways which support them, is the right way to do business.

Share your stories if you have taken part in any charitable activities or community events as it may inspire others to do the same. Together we can be a force for good.

Tell us your ideas for making a positive impact and seek support from the company for your efforts.

Always behave in line with our values and speak to your line manager if you have any concerns that the company's actions or colleagues are impacting negatively on our communities.

What would you do?

A small community group have gathered across the road from our customer's site. They aren't doing any harm but the customer has called for security staff to get them to move away. We are worried that this could create conflict. Should we do as the customer has instructed?

Answer: No, your role as security is to keep the site safe and secure. If the community group pose no threat and are not trespassing on the customer's site then they should be left alone and allowed to move on in their own time.

We do not permit the sharing of confidential information that belongs to the Group, our customers, employees, subcontractors or suppliers without their permission.

The clients, employees, suppliers and partners of the Group that entrust their sensitive and confidential data into our care rightly expect that we take all reasonable steps to protect it. We must also treat the Group's information in the same way and never disclose it to any third party without permission, unless the information has already been publicly disclosed.

'Confidential information' is either information that has been described specifically as being confidential or would be classified as confidential given the subject, such as:

- Business plans, market data, strategy, pricing, new technology, products or services
- Financial and business performance
- Employee data, including any from which they could be identified
- Information that we think the customer would not want or expect us to share or discuss

It does not include information already publicly available.

In everything we do, we must ensure we protect the confidentiality of business information so that it cannot be inappropriately altered or disclosed to anyone who does not have a legitimate need to know.

We have controls in place to ensure we strictly maintain the confidentiality of business information.

You must always comply with the Acceptable Use Policy and protect the confidentiality of business information. This applies both during and after your employment has ended.

Breaching this Policy may materially impact our reputation, our business and our brand. It could lead to criminal prosecution charges too.

What would you do?

My colleague has just left. She promised to let me have a copy of a report that she'd written but forgot to include me on the distribution list. She gave me her computer password so I can access her files and get it anyway. Is that okay?

Answer: No, it's not. You should never share passwords, even with colleagues and accessing her records would be in breach of our policies and may also be in breach of data protection laws. Contact someone else who has been sent a copy.

What would you do?

At a recent external conference I was given a USB memory stick with a copy of all of the presentations from the conference. Can I download the presentations to my computer?

Answer: No. Only USB memory sticks provided by Group IT may be connected to company computers. Contact the conference organisers for email copies.

Never discuss or share confidential information unless you have permission to do so from the person who provided it.

Let your work stay at work. Avoid discussing what you do or how you do it with family and friends and in any social media forums. Don't send or forward company business emails and attachments to personal web-based or private email accounts unless essential for business purposes. Securing the world of our customers means we have to secure our own world too.

If working with external third party suppliers and consultants always use non-disclosure agreements when sharing company information.

Store records and information in all formats, including hard copy, carefully and securely. Only use the company's Google Drive, internal file shares and systems or media that have been approved by IT.

Use secure passwords. Do not re-use passwords across non-Group information systems or share them with others including family members and employees of other companies.

Only seek access to your own accounts and never attempt to get access to those of others by circumventing security controls such as by hacking or bypassing encryption.

The use of USB memory sticks (mass storage devices) to store or transfer any data and file sharing on unapproved systems or private networks or third party cloud services is forbidden.

Ensure you do not disclose confidential information if you make calls while travelling, or if working from a laptop in public places. Use screen protectors and never leave company equipment like laptops and mobile phones unattended and unprotected. Treat company data like your own and keep it secure.

Leave emails from suspicious sources unopened. Report them and any other actual or suspected breaches of our IT policies to your line manager.

Comply with all data protection laws and the company's Acceptable Use Policy. They apply during and even after your employment ends.

What would you do?

My boss is a senior business leader. He has recently handed in his notice and is due to leave next month. I know he is planning to set up his own security consultancy and is currently gathering company data and sending it to his home computer. Should I report this?

Answer: Yes, this may be a breach of our Ethics Code and his contract. You should contact a member of the Legal team or HR or report your concerns via Speak Out.

We do not permit the use of social networking sites to communicate confidential information.

We recognise that social media such as message boards, Twitter, LinkedIn, and Facebook have the potential for enormous reach. They present opportunities for us to connect with our colleagues and customers across the world, to share positive news, and experiences. They can help us stay engaged, learn new things and promote the great work that we do.

We want people to use it wisely and to always think about what they are saying and how the information may be received.

If people do not use it wisely and inappropriate, inaccurate or defamatory information is found, the company will investigate and take disciplinary action.

Using social networking sites in a way that promotes the company and creates positive conversations is the right way to do business.

When using social media you should never disclose confidential information about the company, employees or any third parties. Never risk the safety and security of our people and our customers.

As an ambassador for our brand be respectful of the views of others and never express views which may be considered discriminatory or offensive in any way.

Unless it is your role to use social media to promote the company - for example, salespeople to their networks, and marketing and communications teams to respond to others and to tell stories about the company you should ensure any posts are expressing your own views and not those of the company.

Never respond to any media or third party enquiries arising from social media posts about the company unless authorised.

Report any company information that you find on social media which is inappropriate, inaccurate or defamatory to your line manager or to HR.

What would you do?

I have found some information about the company on Twitter which includes photos taken at work which I think puts our colleagues at risk. What should I do?

Answer: Raise it with your line manager or a member of the International Communications team so that they can follow up and seek to have it removed.

What would you do?

My colleague has posted comments on his Facebook page about a number of public figures. The comments are rude and discriminatory. Should I raise the matter with my line manager?

Answer: Yes, you should. Regardless of whether the comment was made outside of working time and in a private social media forum, it is not in line with our values and could harm our reputation and brand if the comments were reported more widely. Never post any comments which would reflect badly on you or the company.

We require all employees to protect and respect our brand and use it appropriately.

Our brand, which includes our logos and any trademarks, is our intellectual property. Wherever we operate, our brand is important. It reflects our common identity and values and represents an organisation that can be trusted to do business in the right way. We all have a responsibility to safeguard our brand from any misuse.

We also have a responsibility to respect the intellectual property and brands of other organisations too.

Taking care of the Group's intellectual property and any that belongs to others is the right way to do business.

This means we should only use our brand in accordance with the published guidelines and ensure other organisations we work with, like suppliers and contractors, do the same.

It is essential that you respect the intellectual property of other organisations and only use their logos or brands if you have their written permission.

Always check for copyright and trademarks before sharing any documents, images and information.

Do not ignore incorrect or inappropriate use of company intellectual property or that belonging to third parties. Report it to your line manager for further investigation.

What would you do?

I'm giving a sales presentation tomorrow and have included details about one of our key customers including their logo and brand to show how we have other key clients. Do I need to get permission from the customer before including this in the presentation?

Answer: Yes, you do. Their logo and their brand information are their intellectual property and need to be respected. The details of our work for this customer may also be confidential. You should ensure that you have the necessary approvals to share such information. We expect the same treatment for our information and intellectual property.

Our external communications matter and we must take care to ensure they are always accurate and complete and never misleading.

The nature of our operations and our size and scale means the Group is often in the media spotlight. This presents us with opportunities to showcase the critical work we do and important services we deliver, but it also comes with risks. Sharing inaccurate, incomplete or misleading information can undermine all the good news and harm our reputation and our brand.

We all have a responsibility to minimise these risks by ensuring any external communications are accurate, consistent and complete and that they are made by people who have the knowledge and experience to deliver them in the right way.

Communicating information which is true, relevant and complete and is provided in a format and style appropriate for the audience is the right way to do business.

Always direct any enquiries from external third parties like journalists, media, shareholders, or investors to our media relations team at media@totalsecurity.co.uk. Never try to answer questions yourself or even offer an opinion on behalf of the Group/ company unless that is your job and you have been trained to do so.

If you are invited to present or make a comment for the media or in any public forum such as industry meetings, you must obtain approval from your line manager in advance. Any information that is provided must be accurate and not misleading in any way.

Avoid informal conversations with competitors and journalists.

Never disclose confidential information about the Group, our customers, suppliers, competitors or colleagues.

Use social media wisely. When sharing information, even privately on your own account, always think about what you are saying and how the information may be received. If you are making comments about the Group then make sure it is clear that they are your own views.

Never use offensive or defamatory language or make derogatory comments about the Group, other people or other organisations.

Approval and training is required for employees using our public social media accounts posting information on behalf of the company.

Breaches of this Code will always be investigated and if evidence is found, the company will take disciplinary action.

Report any concerns that you have about external communications to your line manager or via Speak Out if that is not possible.

What would you do?

A supplier has asked me to speak about my role as a security manager at an industry wide conference they are organising. Do I need to get permission to do this?

Answer: Yes, you do. The forum is likely to be attended by both customers and competitors. You should discuss the request with your line manager before agreeing to it.

What would you do?

During a social meeting outside work, a colleague was telling friends all about her work at the company, including some confidential information about our plans for expansion. Should I say something?

Answer: Yes. We should never share any confidential information about the business including about our suppliers, customers, colleagues and competitors. If you feel able to, raise this matter with your colleague drawing her attention to this Code. If you are concerned about the information shared, speak with your line manager.

This Code is intended to help you do business in the right way. To make that possible we will make sure it is widely distributed and regularly updated.

Copies will be made available:

- To all senior managers every time it is updated. They will be asked to confirm their commitment and understanding and that they will ensure it is applied in all their areas of responsibility.
- To all managers when they join the company. They will be asked to review and confirm their understanding.
- To all employees, their line managers and local HR, Finance, Communications and Legal departments. It forms part of the induction for every employee in the Group.
- To suppliers and subcontractors, as part of any contract they agree with the Group.

The Code sets out the behaviours expected in line with our values, our policies and standards. When committing to work with or for the Group, you are committing to following this Code. In some cases it will form part of your contract of employment. In many cases the terms within it are also the law. Please follow it and if you have any concerns about doing so raise them with your line manager or if that is not possible via Speak Out.