

Dated 22nd October 2025



CORPORATE SOCIAL RESPONSIBILITY POLICY

SCOPE

Elite Security Group seeks to be a good corporate citizen in all aspects of its operations and activities. To this end we have brought together a series of operating principles under the broad heading of Corporate Social Responsibility (CSR) to serve as a guide to employees in all aspects of their work for the company. The principles cover all areas of the Group's operations and have been developed with reference to the relevant codes of corporate governance and best practice, including the revised Combined Code and international statements and guidelines such as the UN Universal Declaration of Human Rights and the OECD Guidelines for Multinational Enterprises.

Taken together, these principles form our CSR policy. The policy can be divided into six main areas:

1. Ethical Business Conduct
2. Policies Specific to Employees
3. Policies Specific to the Company
4. Fair Employment Practices
5. Workplace Health and Safety
6. Environmental Policy

ETHICAL BUSINESS CONDUCT

We value the principles of accountability, honesty and integrity in all aspects of our business. Our policy is to conduct our business in a manner which ensures:

- fair treatment of all employees and clients
- transparency of our business policies and practices
- high standards in all matters relating to health, safety and the environment
- ethical business practices throughout our operations

We recognise that the involvement of our employees is key to the future success of the business and we have for many years adopted a policy of keeping employees fully informed on all matters affecting them. We have consistently operated a remuneration strategy that recognises both corporate and individual performance. We are also committed to best practice in employment matters, recognising the role this plays in attracting and retaining staff. To succeed in delivering the best possible service to our clients, every employee is expected to adhere to the group's core values and to uphold them in the workplace. Employees are expected at all times, to exercise the highest ethical judgement and comply with laws applicable to their duties.

POLICIES SPECIFIC TO EMPLOYEES

Compliance with Codes and Regulations

In addition to the Group's internal operating principles, employees shall adhere to all laws and regulations.

Outside Interests

The Company requires that employees avoid at all times any situation which may involve a conflict of interest between the employee and the company. In general, this does not apply to charitable work or relationships with non-profit organisations unless this has the potential to impact on the employee's normal duties.

Dealing with Customers, Stakeholder and External Parties

The Company is committed to the provision of accurate information and fairness in all its dealings with customers, stakeholders, officials and any other external party having direct business with the group.

Confidentiality

Every employee shall respect any information which is confidential to the Company including, but not limited to, trade secrets, confidential knowledge or any information concerning the process or invention used by the Group. Breaches of confidentiality may be cause for disciplinary action.

Data Protection

We are committed to complying with the data protection principles established by the 1995 EU Directive on Data Protection. This commitment applies throughout the group and in all regions in which it operates. All employees and agents of the Group are responsible for

ensuring compliance with the policy. Information collected may be accessible throughout the Group but will not be disclosed to any third party in a form which identifies the individual concerned. It will not be used for marketing purposes without the individual's consent and will not be sold to third parties. Upon request, an individual will be informed of the existence, use and disclosure of his or her personal data and will be given access to that data to confirm its accuracy or amend it as appropriate. *Please refer to our IT & Data Protection Policy for full terms and conditions.*

Fair Dealings

Dealing for clients will be undertaken in an order and manner which is unquestionably fair for the client.

Malpractice

The Company actively works to deter malpractice in its workplace. The Company has detailed procedures for staff to follow in order to ensure observance of these principles. The Employee Handbook contains guidance on the value of gifts which may be given (or accepted) by staff to (or from) counterparts in the industry, the frequency with which those gifts may be made (or accepted) and how they should be recorded.

Use of Company Information / Assets

Employees shall use the company's computer systems, internet and intranet, and email systems for business use. Any employee found to have disclosed confidential information, been abusive or malicious in using these facilities, or misusing the systems in any way may face disciplinary action. The Group strictly prohibits the use of its intranet, internet or email systems for acquiring, producing or disseminating pornography or similar material, including the use of abusive language or offensive images. *Please refer to our IT & Data Protection Policy for full terms and conditions.*

Disciplinary Procedure

The Company has a detailed formal disciplinary procedure, full details of which are contained within the Employee Handbook and/or Company website.

POLICIES SPECIFIC TO THE COMPANY

Political Contributions

It is the Group's policy not to make contributions for political purposes. However, employees are not hindered from being politically active in their own time using their own resources.

Corporate Governance

Background

Elite Security Group (which includes Elite Security Management Services Limited, Elite Security Manned Guarding Limited and Elite Alarm Monitoring Services Limited) provides Manned Guarding, Mobile Patrols, Keyholding and alarm Response Services and is certified to an accredited international quality standard, ISO 9001. It is also certified to the Security Industry Authority's Approved Contractor Scheme, and is regularly audited by external auditors for compliance with these standards. This guarantees a level of commitment and service to our customers. In particular, where security of customers' property and good is required, the Company operates to British Standards 7499, 7984, 7858 and 7958.

Organisation

The Company website provides access to a current Organisation Chart.

Meetings of the Board of Directors

The Board of Directors are scheduled to meet six times each year to review financial performance and strategy and has a formal schedule of matters reserved for its decision, which includes the setting of company goals, objectives, budgets and other plans. In particular, the Board regularly receives reports on the Group's corporate social responsibilities and they have identified the relevant risks to the Group's short and long term values.

Internal Controls

Scott Huntley is Director of Support Services and he has overall responsibility for the Group's system of internal control and for reviewing its effectiveness. The internal controls are designed to cover all risks to achieving the Group's objectives including all business, operational, financial and compliance risks. The internal controls are designed to manage, rather than eliminate, risk of failure to meet business objectives and to provide reasonable, but not absolute, assurance against material misstatement or loss. The system of internal control is embedded within the day to day operations of the Group and a strong control culture is combined with clear management responsibility and accountabilities for individual controls. Directors are keenly aware of the importance of these issues and are committed to ensuring that any risks are assessed and minimised.

Community Investment

During each year, the Group uses a variety of opportunities to sponsor or donate as appropriate. These vary from year to year, but funds are often spread across a variety of mainstream charities or community based projects, operated as not-for-profit. The Group will aim to grow this core amount over time and, depending on the profitability of the Company, may make specific one-off donations.

FAIR EMPLOYMENT PRACTICES

Equal Opportunities Employer

The Group is committed to providing equal opportunities to all workers and job applicants. It aims to ensure that no job applicant shall receive less favourable treatment on the grounds of sex, marital status, sexual orientation, race, colour, religion or belief, nationality or ethnic or national origin. The company will not treat an employee or job applicant less than favourably for a reason relating to their disability or part time or fixed term status unless this can be justified. The Group will also take all reasonably practical steps to ensure that disabled applicants or workers are able to participate in its business activities on an equal basis with people who are not disabled. All employees are responsible for complying with this policy and for ensuring that the standards of behaviour required by the company are observed by:

- Treating others on their merits and disassociating themselves from any form of direct or indirect discrimination, victimisation or harassment.
- Bringing to the attention of their Line Manager any suspected working practise in breach of this policy.
- Working together to promote a harmonious working environment free from discrimination, harassment and bullying.

The Company regards direct or indirect discrimination, victimisation and harassment as a serious matter. Employees who fail to comply with this policy will be subject to the Company's disciplinary procedure. All breaches of this policy will be regarded as serious disciplinary matters and will, if there has been victimisation, intentional discrimination or deliberate harassment be regarded as potential gross misconduct leading to summary dismissal.

The Company recognises that misunderstandings can arise where people of a different sex, interests and cultures work together. Any employee who believes that he or she is being treated in a way that is contrary to this policy should raise the issue with their Line Manager. If an employee feels that it is inappropriate to approach their Line Manager he or she may contact the Human Resources Department. The Human Resources Department, headed by

Scott Huntley, carries out a periodic review of the group's equal opportunity policy and monitors the effects and the application of this policy across the group.

Discrimination, Sexual Harassment and Other Forms of Harassment and/or Bullying

All staff are entitled to work in an environment which respects their personal dignity and which is free from harassment, bullying or any other type of intimidation. Harassment, whether on the grounds of sex, race, colour, nationality or ethnic origin, religion or belief, or age, disability, sexual orientation, being in an inferior position in terms of power or hierarchy (leading to bullying), willingness to challenge harassment (leading to victimisation) or otherwise will not be tolerated by the Company.

Grievances

The Group has adopted a grievance procedure to provide employees who consider that they have a problem or complaint about their work with a mechanism for resolving the issue fairly and speedily. The grievance procedure encompasses the statutory grievance procedure.

WORKPLACE HEALTH & SAFETY

Health & Safety Policy

The Group aims to provide each employee with a safe place to work. All group locations are required to abide by local health and safety regulations and each must submit on a regular basis to health and safety testing for accreditation. Relevant information on occupational health and safety is provided in the Employee Handbook. *Please address our full Health & Safety Policy.*

H&S Records

The group records all accidents and/or near misses and investigates these to determine if preventative action is required to prevent further accidents.

ENVIRONMENTAL POLICY

Elite Security Group recognises that it has a responsibility to the environment beyond legal and regulatory requirements. We are committed to reducing our environmental impact and continually improving our environmental performance as an integral part of our business strategy and operating methods, with regular review points.

We have installed energy saving measures in our Head Office which reduce the amount of lighting we require and use. Our paper recycling commitments has been extended to include confidential waste, and our approach to communicating with customers moves more towards

the electronic based. This includes providing USB memory sticks to new clients with various policies and procedures and copy certificates.

In addition to this, reference will be given to recommendations published by the Carbon Trust, and where suitable, their training and advisory documentation will be relayed to senior management for subsequent training provision throughout the organisation. We will encourage customers, suppliers and other stakeholders to do the same.

The Company is also considering the implementation of the ISO14001 in this regard.

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