

Dated 11th January 2018



ANTI-BRIBERY POLICY STATEMENT

SCOPE

Elite Security Group (which includes Elite Security Management Services Limited, Elite Security Manned Guarding Limited and Elite Alarm Monitoring Services Limited) provides a variety of security solutions which are predominantly provided using man-power based or man-power focussed activities. These activities are provided in accordance with BS7499 and B7984 and BS7858.

This statement is made pursuant to the Bribery Act 2010 and sets out the steps that Elite Security Group has taken and is continuing to take to ensure that any form of bribery (or some other inducement – material or otherwise), is not taking place within our business or supply chain.

DEFINITION

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision. A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law. Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's Board of Directors.

APPLICABILITY

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

STATEMENT

Elite Security Group is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. Elite Security Group has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate. Elite Security Group will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regards to our conduct and we recognise that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

Whilst Elite Security Group has not identified any areas of risk in our business practice, the Company continues to maintain suitably robust processes and policies which compliment our wider approach to bribery and/or corruption and associated risks.

A handwritten signature in blue ink, consisting of stylized, cursive letters that appear to be 'JL' or similar initials.

Statement Approved on 11th January 2018