



Our Business is Protecting Yours

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## Corporate Code of Conduct Policy

### The purpose of this Code of Conduct

The Directors of AlertSystems expect the highest ethical standards from employees and other personnel in carrying out its business.

This policy:

- Describes the principles by which AlertSystems expects to conduct its business
- Provides employees with guidance on the standards expected when conducting business on behalf of AlertSystems

It is essential that everyone in AlertSystems maintains the company's reputation for integrity. Everyone should act honestly, fairly and with transparency and should be loyal to AlertSystems in the conduct of their work. They should not act in a manner which could discredit themselves or AlertSystems or put themselves in a position which may result in a conflict of interest.

AlertSystems respects the rule of law and requires all employees to conduct its business in a way that ensures compliance with the rules that apply to AlertSystems.

**Supporting Policies** – A number of the principles in this Code are supported by more detailed company policies. All employees are required to comply with all AlertSystems Policies.

**Scope** – This Code of Conduct applies to all AlertSystems employees, temporary personnel, our agents and contractors. We also expect our suppliers to adhere to this Code or to adopt their own similar ethical standards.

**Breach of this Code** – Any breach of this Code may be considered to be a disciplinary matter and could result in disciplinary action up to and including dismissal.

### Key Principles

**Compliance with the law** – AlertSystems employees must observe both the spirit and letter of UK laws and regulations.

**Bribery and corruption** – AlertSystems does not permit the bribery of any person involved in AlertSystems business or any customer, supplier or business partner of AlertSystems.

**Fraud** – AlertSystems does not tolerate fraud.

**Money Laundering** – AlertSystems does not tolerate money laundering

**Gifts and hospitality** – No AlertSystems employee or family member should accept or solicit or give (directly or indirectly) any improper gift or hospitality.

**Confidential information** – AlertSystems business and customer information must be kept confidential.

**Conflicts of interest** – AlertSystems employees and other personnel must avoid situations where personal interests could conflict, or appear to conflict, with AlertSystems interests.

**Customers and suppliers** – AlertSystems must treat customers and suppliers fairly. We expect the same standards of them as we expect from our employees.

**Competitors** – AlertSystems employees must comply with all competition and anti-trust rules in the UK.

**Governance** – AlertSystems is committed to high standards of corporate governance, transparency and responsibility.

**Health and safety** – AlertSystems will provide a safe and healthy working environment and does not compromise the health or safety of any individual.

**Environment** – AlertSystems will run efficient operations that minimise waste and reduce any negative effect of its business activities on the environment. We promote sustainable development across all areas of the business.





## Our Business is Protecting Yours

### Employees and Supply Chain

AlertSystems values its employees and their diversity. We will develop our people and reward them fairly.

AlertSystems is committed to taking steps to ensure there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. The Company expects the same high standards from all of its contractors, suppliers and other business partners. Wherever practicable, the Company will seek to include in its contracts specific obligations to comply with applicable anti-slavery and human trafficking laws, including the Modern Slavery Act 2015, and we expect that our suppliers will hold their own suppliers to the same high standards. This includes slavery and abduction, misuse of public and prison works, forced recruitment, debt bondage and domestic workers under forced labour situations, child labour and internal or international trafficking. We are committed to combatting slavery and human trafficking. This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes the company's annual slavery and human trafficking statement.

We prohibit the use of forced labour, bonded labour, prison labour and child labour within our company or those that supply to or sub-contract for us. The company will not tolerate the use of child or forced labour, or the exploitation of children and we expect that our suppliers will follow and uphold the same standards.

#### Guidance

AlertSystems has a zero tolerance approach to Modern Slavery and the use of child labour of any kind within our operations and supply chain and staff are expected to report concerns, using the appropriate reporting channels, and we are committed to act upon any such reports.

#### Questions or concerns

If employees are unsure of the right course of action to take or they suspect someone else of acting contrary to this Code, or if they do not understand anything contained in this Code, they should speak with any of the following:

- Immediate line manager
- The Human Resources manager
- Any Director.

Employees should never hesitate to ask questions, raise concerns, or seek the guidance.

AlertSystems will not tolerate any retaliation or discrimination against anyone who has reported a concern in good faith.

**Compliance with the Law** – AlertSystems businesses, employees and others to whom this Code applies must observe both the spirit and letter of the laws and regulations.

**Theft, Fraud and Bribery** – AlertSystems does not permit the bribery of any person involved in the Company's business or any customer, supplier or business partner of AlertSystems.

#### Guidance

Employees must not, directly or indirectly, authorise, offer, promise, pay or give a:

- **Bribe** – A bribe is a reward, advantage or benefit made in order to influence and/or secure an improper advantage. The amount of the bribe offered or paid is irrelevant and it need not actually be paid
- **Kickback** – A kickback (e.g. the payment or receipt of a payment in return for securing a contract) is a form of bribe
- **Facilitating payment** – A facilitating payment is a relatively small payment or gift to an official or government employee made to expedite routine services or administrative actions to which the company would already be entitled. Such payments should not be made in any circumstances
- **Excessive hospitality** – In some circumstances, excessive hospitality can be seen as either giving or receiving a bribe. Such hospitality can include gifts, entertainment, invitations to events (for example sporting events) or other social activities.



## Our Business is Protecting Yours

### Fraud

AlertSystems does not tolerate fraud.

#### Guidance

All staff have a responsibility to be alert to the signs of fraud and to report suspected fraud.

AlertSystems defines fraud as any intentional act committed to secure an unfair or unlawful gain.

This includes:

- Fraudulent financial reporting (such as manipulation of vendor rebates, false sales, delaying or avoiding expenses)
- Misappropriation of assets (examples include fraudulent expense claims, burglary and property damage, misuse of customer accounts or customer data)
- Theft
- Bribery or corruption
- Concealing a conflict of interest

AlertSystems is committed to the prevention, detection and proper investigation of fraud.

AlertSystems will respond to all incidents of fraud, seeking to recover loss, taking action against those who perpetrate fraud and reporting incidents to the authorities as appropriate. This may lead to prosecution or to disciplinary sanctions up to and including dismissal.

We expect our business partners to uphold similar principles for fraud risk management.

### Money Laundering

AlertSystems does not tolerate money laundering.

#### Guidance

All staff have a responsibility to be alert to the potential signs of attempted money laundering.

It is the policy of AlertSystems to comply with all applicable statutes, regulations and government guidance regarding Anti-Money Laundering Regulations and terrorist activities.

- Payments should be received via an identified customer bank account or electronic transfer
- Cash payments will only be accepted to a maximum value of £500 and the customer identity will be verified
- Customer accounts, relationships and transactions will be monitored to identify possible suspicious activity
- Appropriate action will be taken if possible suspicious activity has been detected

### Gifts and Hospitality

No AlertSystems employee or family member should accept or solicit or give (directly or indirectly) any improper gift or hospitality.

#### Guidance

- Accepting hospitality from, or providing entertainment to, third parties is acceptable if it is reasonably related to a clear business purpose and is modest
- It is recognised that the giving and receiving of business gifts is an integral part of the way in which some businesses operate



## Our Business is Protecting Yours

### Confidential Information

AlertSystems business and customer information must be kept confidential.

#### Guidance

- Confidential information should not be used for personal gain. You should treat email with the same confidentiality as other forms of communication
- Dissemination and disclosure of commercial information must be dealt with in accordance with the AlertSystems Communications Code and in compliance with competition and anti-trust laws
- The obligation of confidentiality extends to periods after employees cease to work for AlertSystems and includes the disclosure of information to others.

### Social Media

It is possible social media is used for work purposes (e.g. LinkedIn) or for personal use outside of work (e.g. social networking sites such as Facebook and YouTube or discussion forums). Any social media use should be respectful to AlertSystems, its employees, practices and associated companies. Usage should be relevant, protective of the AlertSystems reputation and should follow the letter and spirit of the law.

When using social media employees must not disclose confidential information (including price sensitive information) and should also be mindful of protecting their own privacy.

### Data protection

Employees must only collect and retain personal data for legitimate commercial purposes and must respect the privacy of personal data relating to employees, customers and suppliers.

AlertSystems will ensure that its data and information systems comply with data protection laws.

### Conflicts of Interest

AlertSystems employees must avoid situations where personal interests could conflict, or appear to conflict, with AlertSystems interests.

#### Guidance

- Conflicts of interest arise where a person's position or responsibilities within their business unit present an opportunity for personal gain above the normal rewards of employment.
- Employees must not work simultaneously for any of AlertSystems competitors, customers or suppliers.

### Customers and Suppliers

AlertSystems treats its customers and suppliers fairly. We expect the same standards of them as we expect from our employees.

#### Guidance

AlertSystems reputation and the loyalty of our customers depends upon the quality and value of our products and the service we deliver. The integrity of our dealings with customers and suppliers is therefore critical to the long-term success of AlertSystems.

- We will pay our suppliers, contractors and agents in accordance with agreed terms.
- We expect our suppliers, contractors and agents to adhere to this Code or adopt similar ethical standards.
- Our ISO 9001 Quality Management System ensures robust systems and processes to ensure that our Customers and Suppliers are treated fairly. These controls are reviewed regularly by the Senior Management Team and are subject to external assessment and audit.
- There are formal customer complaint procedures to ensure all issues are documented with a clear escalation policy to ensure they are resolved to the Customers satisfaction.
- All new customers are required to complete a formal satisfaction note on the completion of works and are invited to complete an online quality survey. The actions arising from the completed survey are implemented.



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### Health and Safety

AlertSystems will provide a safe and healthy working environment and does not compromise the health or safety of any individual. The company Health and Safety procedures are accredited and audited in accordance with their OHSAS 18001 accreditation.

### Guidance

- AlertSystems aim is to create an accident-free workplace and we are committed to continual improvement in health and safety performance throughout our operations
- AlertSystems has high standards of care for the safety of our people, products and operations and for the environment in which our people work
- AlertSystems will provide the necessary training and resources to allow for the safe performance of day-to-day activities
- Effective safety management requires the active involvement of every employee

### Environment

AlertSystems will run efficient operations that minimise waste, reduce any negative effect of its business activities on the environment and promote sustainable development.

Signed:

A handwritten signature in black ink, appearing to be "P. Brake".

**Name:** Paul Brake  
**Position:** Joint Managing Director  
**Date:** 1<sup>st</sup> May 2019

Signed:

A handwritten signature in black ink, appearing to be "M.C. Nickels".

**Name:** Mark Nickels  
**Position:** Joint Managing Director  
**Date:** 1<sup>st</sup> May 2019