



FGH SECURITY QUALITY MANAGEMENT SYSTEM

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# CORPORATE AND SOCIAL RESPONSIBILITY POLICY

REF: PE04

## CORPORATE SOCIAL RESPONSIBILITY

### Scope

FGH Security seeks to be a good corporate citizen in everything that it does at the heart of the organisation its values and culture are focussed upon; staff, clients and community. This policy brings together our existing operating principles into one framework policy under the heading of Corporate Social Responsibility (CSR). The principles encompassed in this policy cover all areas of the FGH's operations and have been developed and continue to be reviewed against and updated by reference to relevant codes of corporate governance and international standards including;

- The Human Rights Act 1998
- The Equality Act 2010
- ISO14001
- The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- The Guidelines for Multinational Enterprises established by the Organisation for Economic Cooperation and Development (OECD)
- The Rio Declaration on Environment and Development
- The UN Convention against Corruption

The FGH Security Board of Directors supports the principles set out by the above legislation, codes and standards and the aim of this policy is to translate that support into a set of guidelines and standards that set a common approach for all facets of FGH Security and provide practical guidance for our managers and employees during their employment with us, from Senior Managers working with external suppliers, stakeholders and other agencies through to our security operatives performing their roles on our clients' sites.

### Compliance, monitoring and reporting

Compliance with this policy will be continuously monitored and subject to review by the Senior Management and Directors of FGH Security and, where applicable, independent agencies. Compliance will be reported to all relevant stakeholders through the FGH's Annual Almanac (which provides a comprehensive view of the company's performance and highlights key areas of development and/or good practice) CSR section or a biannual Corporate Social Responsibility Report.

Each FGH manager is responsible for ensuring that the principles set out in this policy are communicated to, understood and observed by all employees and for ensuring compliance in their area of responsibility. Employees who reasonably suspect that there has been a breach of this policy must report it to their line manager, senior management, or other mechanisms established by the FGH to report such breaches (such as using the [feedback@fghsecurity.co.uk](mailto:feedback@fghsecurity.co.uk) dedicated email address). We recognise that employees may be reluctant to report concerns for fear of retaliation and will take disciplinary action against any employee who threatens or engages in retaliation, retribution or harassment of any person who has reported or is considering reporting a concern in good faith. It is imperative to us as an organisation that information, opinions and insight are free to move through the company so we can effectively resolve any issues and grow as an organisation.

The Directors and Senior Managers of FGH Security will not criticise management for any loss of business resulting from adherence to the principles set out in this policy. All sections of this policy are underpinned by the FGH's Code of Ethics, which is set out in Section 1. The other areas covered by this policy are Safety and Security (Section 2), Employment (Section 3), Customer and Community (Section 4) and Environment (Section 5).

## CORPORATE SOCIAL RESPONSIBILITY

### SECTION 1 CODE OF ETHICS

This code applies to all of the operations of FGH Security and, where applicable, key partners in this supply chain. It sets out the minimum standards which the Directors and Senior Managers of FGH Security expect from staff in their internal and external dealings with colleagues, customers, stakeholders and third parties.

#### *Basic Standards of Conduct*

- (a) We will conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, clients and the wide communities in which we operate or have an impact upon (which includes deployments of staff).
- (b) We will respect the legitimate interests of third parties with whom we have dealings in the course of our business.
- (c) We will maintain the highest standards of integrity befitting our position as one of the UK's leading manned security providers.

#### *Employees*

FGH Security as a company

- (a) is committed to creating and maintaining a safe and healthy working environment for its employees.
- (b) will strive to create a workplace in which there is mutual trust and respect and where every person feels responsible for the performance and reputation of our company and the FGH brand.
- (c) will respect the individual and each other's rights, customs and traditions.
- (d) will work towards achieving a diverse workforce, recruiting, employing and promoting employees only on the basis of objective criteria and the qualifications and abilities needed for the job to be performed.
- (e) will maintain good communications with employees through our information and consultation procedures.
- (f) will assist employees in realising their potential.

#### *Customers*

- (a) FGH Security is committed to providing safe, added value, high quality, consistent, accessible and reliable services to its customers.

#### *Stakeholders*

- (a) FGH Security will conduct its operations in accordance with the principles of good corporate governance.
- (b) We will provide timely, regular and reliable information on the business to all our stakeholders.

#### *Business Partners*

- (a) We aim to develop strong relationships with our suppliers, stakeholders and others with whom we have dealings, based on mutual trust, understanding and respect.
- (b) In those dealings, we expect our partners to adhere to business principles consistent with our own.
- (c) FGH Security will conduct its operations in accordance with the principles of fair competition and applicable regulations.

#### *Compliance with Law*

- (a) FGH will comply with the laws and regulations applicable wherever they do business. Appropriate training will be provided for employees as necessary.

#### *Business Integrity*

- (a) FGH Security shall not offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain and no employee may offer, give, seek or receive any gift or payment

## CORPORATE SOCIAL RESPONSIBILITY

which is, or could be construed as, such. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her manager.

(b) FGH Security accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.

(c) No undisclosed or unrecorded account, fund or asset will be established or maintained.

(d) FGH Security will not facilitate, support, tolerate or condone any form of money laundering.

### *The Environment*

(a) FGH Security is committed to making continuous improvement in the management of its environmental impact.

(b) We will work with our partners to promote environmental care, increase understanding of environmental issues and disseminate good practice.

### *Community Involvement*

(a) FGH Security strives to be a good corporate citizen and to fulfil our responsibilities to the societies and communities in which we operate.

### *Conflicts of interest and confidentiality*

(a) Whilst FGH Security respects the privacy of its employees, all FGH Security employees are expected to avoid personal activities and financial interests, which could conflict with their responsibilities to FGH Security.

(b) FGH Security employees and consultants must not seek gain for themselves or others through misuse of their positions or company property.

(c) All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) should be disclosed to and discussed with an employee's line manager.

(d) Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given.

(e) Where information is confidential, that confidentiality must be respected at all times.

## SECTION 2 SAFETY, SECURITY AND INTEGRITY

The health and safety of our employees, customers and members of the public is our paramount concern. Safety underpins all our operations. We have developed a high-level health and safety policy. Please refer to PE13 Health and Safety Policy:

We also require contractors to comply with this policy whilst they are working at our premises.

### *Security and Integrity*

Security and integrity are key issues for our clients, our staff and our business. We recognise the range of security issues which can arise and have implemented the following high level security and integrity policy.

(a) The Directors and Senior Managers of FGH Security are committed to ensuring, so far as is reasonably practicable, the security of clients using our services, our employees at work and our property.

(b) The threats to security are wide ranging, significant and, in the main, driven by external influences. The ability to control risks varies. However, we have the ability to address or mitigate all of the threats which apply. To be successful in this we need the co-operation and engagement of all of our staff, clients and partner organisations.

(c) Security is an area in which we seek continuous development and improvement and compliance with existing and emerging legislation. We will heighten the profile of security to ensure all members of staff understand why they should and how they can play their part. We will also work on ways to involve the wider community and other stakeholders. Our efforts will bring greater personal and corporate security and business benefit.

## CORPORATE SOCIAL RESPONSIBILITY

(d) This statement provides guidance and direction to all employees on what is both required and expected of them. We are confident our staff will appreciate the reasons for this and the benefits to them, their colleagues, our clients and our property.

(e) We aim to achieve, so far as is reasonably practicable:

- A secure environment for clients and their customers/visitors using our services ☐
- A secure environment for staff in their work ☐
- Security of our property ☐
- Security of our systems and processes

(f) We will develop systems to monitor our performance on security and integrity within our operations. All operations will be subject to detailed periodic inspection and review.

(g) The Senior Managers will provide regular reports on security measures and integrity testing in place within FGH Security to the Directors

(h) Staff are actively encouraged to report security concerns.

## SECTION 3 EMPLOYMENT

In formulating its employment policies, FGH Security is guided by the framework established by the Organisation for Economic Co-operation and Development (OECD) in its Guidelines for Multinational Enterprises. These Guidelines encourage companies to foster openness, sustainability and respect for employee rights. Our employment policies cover all employees of FGH Security and its subsidiaries.

### *Equal Opportunities and Diversity Policy*

(a) The Board of Directors of FGH Security is committed to equality of opportunity both in the provision of services to the public and as an employer. This policy sets out FGH Security's commitment to treat equally and with fairness at all times its employees, customers, contractors and those who come into contact with the company.

(b) We are committed to seeking continuous improvement and compliance with legislation based on the following principles. ☐

- Everyone has the right to be treated with dignity and respect.
- We will not discriminate on the grounds of race, gender, disability, nationality, religion, philosophical belief, political belief, age, sexual orientation, family status, trade union activity or any other factor.
- We will adopt fair and inclusive practices throughout our operations and will seek to eliminate all prejudice, discrimination, bullying and harassment. ☐
- All employees have a personal responsibility for the practical application of this policy in their day-to-day activities and must support the policy at all times. ☐
- Non-compliance with this policy will be treated seriously and will not be tolerated.

(c) The Directors of FGH Security and the Senior Managers are required to ensure:

- They create a productive and safe working environment, promoting diversity and inclusion in their workforce; ☐
- They develop new practices, as appropriate, to ensure all employees, contractors and customers are treated fairly; and ☐
- They can demonstrate continuous improvement in practices to promote diversity and equal opportunities for all.

## CORPORATE SOCIAL RESPONSIBILITY

### *Legislation and Codes of Practice*

We will comply with and exceed where possible, current national and international legislation and relevant codes of practice. We will monitor our compliance with this policy and the requirements of relevant underpinning legislation as appropriate.

### *Partner Organisations*

We are committed to actively working with partner organisations to ensure our policies, procedures and practices are in line with best practice.

### *Practices and Standard Operating Procedures*

Each division of company will put in place practices and standard operating procedures to ensure the commitments in this policy are applied and implemented throughout the organisation.

### *Access to Company Premises*

We will take all reasonable steps to ensure that our buildings and premises are accessible to disabled employees, customers and visitors as required by the Disability Discrimination Act (DDA) in the United Kingdom.

### *Access to Vehicles*

We will also take reasonable steps to ensure that our vehicles are accessible to customers and staff and comply with the relevant legislation.

### *Access to Information*

We will seek to ensure that information is made available to our customers and employees in alternative formats as required.

### *Recruitment*

All recruitment will be carried out with regard to fairness, equality and consistency for all candidates at all times. Recruitment practices will be inclusive and we will endeavour to ensure there are no barriers to employment of suitable candidates.

### *Staff Training*

We will provide our staff with the necessary guidance and training to ensure the effective implementation of this policy and to ensure we are an inclusive employer and service provider.

### *Complaints*

Any employee who feels that he or she has grounds for complaint in relation to bullying, discrimination, harassment or victimisation has the right to pursue the complaint through our grievance procedures. Customers who feel they have grounds for complaint may pursue these through our operating company customer complaints procedures. We will ensure our complaints/feedback procedures can be accessed and used by everyone and the results of any investigations and any subsequent changes to operational practices are disseminated appropriately and in a timely manner.

### *Reporting*

We are committed to monitoring and reporting on our actions and achievements in relation to implementing this policy both internally and externally.

### *Auditing*

We are committed to ensuring that our operations comply with the requirements of this policy and will periodically audit its implementation.

## CORPORATE SOCIAL RESPONSIBILITY

### *Human Rights*

FGH Security supports the principles of the United Nations Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

- We will adhere to the following principles in respect of our staff:
- We will treat all employees fairly and honestly, regardless of where they work. All staff will have agreed terms and conditions in accordance with local law or practice and will be given appropriate job skills training.
- We will always pay a fair wage reflecting conditions, service delivery requirements and the nature of job roles. We will always exceed the national minimum wage.
- Working hours shall not be excessive.
- We will not force overtime on our workforce.
- We will abide by the non-discrimination laws.
- We will not use or condone the use of mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.
- We will have formal grievance procedures through which staff can raise personal and work-related issues.
- All staff will be given reasonable access to bathroom and rest facilities.

### *Data Protection*

We will comply with the relevant legislation and principles governing data protection and any policies that any of our clients have in place.

## SECTION 4 CLIENTS AND COMMUNITY

### *Clients*

FGH Security wants to lead the way in transforming the security industry and the way customers feel about manned security services. By aiming for the top in everything that we do, and helping each other, we can deliver the highest levels of safety and added value service and give greater customer and employee satisfaction. We will share all the success of our Company and reach our destination as the number one manned security provider in the United Kingdom. We will:

- Act in accordance with fair business, marketing and advertising practices and take all reasonable steps to ensure the safety of our staff, clients and their customers. ☐
- Provide transparent and effective procedures that address customer complaints and contribute to fair and timely resolution of disputes without undue cost or burden
- Not make representations or omissions nor engage in any other practices that are deceptive, misleading, fraudulent or unfair ☐
- Respect customer privacy and provide protection for personal data in accordance with any and all legislation.

### *Stakeholders*

We are committed to maintaining open and regular dialogue with all our stakeholder groups in matters that affect their interests. These range from formal consultation to regular informal contact on a day-to-day or week-to-week basis.

### *Suppliers Ethical Purchasing Policy*

(a) We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on a number of key suppliers for the delivery of our core services. Good working relationships with our suppliers are therefore central to the success of our business. For this reason, we clearly state our purchasing policy as part of ensuring that our business standards are integrated throughout the supply chain.

## CORPORATE SOCIAL RESPONSIBILITY

(b) We are committed to obtaining and retaining competitive goods and services while at the same time ensuring they are from sources which have not jeopardised human rights, safety or the environment.

(c) We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect.

(d) More specifically we expect our suppliers to:

- Adhere to business principles consistent with our own.
- Ensure that their products and services are produced and delivered to comply with all legislation relevant to their business. ☐
- Seek to maintain continuous improvement in their supply chain relationship with us.
- Ensure they adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to us.

(e) We will seek to work with our key suppliers to: ☐

- Develop long-term meaningful relations to the benefit of both parties.
- Improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties.

### *Community*

We are always conscious of the impact we have and our role in the communities in which we operate. We play a role in keeping people safe in wider communities and our operations can have a direct impact on wider society. The operation of our services touches on all members of the community with the potential to impact positively on quality of life. We also operate from a significant number of sites and event spaces and have responsibility to those living and working nearby as well as being a significant employer.

Our relationships with the local communities we serve are therefore very important to us and are an essential part in the growth of our business. When developing our services, we have a role to play in improving services for the community as a whole and not just our individual customers. Through our community strategy, we therefore engage with the community at a range of levels as customers, neighbours, potential employees, businesses and residents.

Through our community strategy, we seek to play our part in promoting socially inclusive policies, encouraging the young and disadvantaged and helping older members of the community and the disabled. In line with our core values, our community strategy incorporates the following elements:

- Engagement with the local communities in which we operate and assist wherever possible in charity and voluntary initiatives which align with the company's values and/or employee interests (i.e. supporting fundraising activity that employees take part in, allowing employees to choose charities that we work with on an annual basis assisting clients in fundraising activities through donations and active publicity)☐
- Work with local authorities, businesses and other interested parties to promote sustainable business practices, to reduce environmental impact and improve quality of life.
- Offering employment opportunities to all sectors of the community through non-discriminatory policies and promoting opportunities to disadvantaged, vulnerable groups and/or groups which are proportionally underrepresented in the security industry.

Promoting engagement between our staff and the community; ☐

- Supporting local community FGHs and charities; ☐
- Improving the environment in and around our operations; ☐
- Promoting broader opportunities for workplace learning; ☐
- Supporting local initiatives for the development and education of young people in the areas we serve;

## CORPORATE SOCIAL RESPONSIBILITY

- Working closely with local law enforcement agencies to address antisocial behaviour, crime and vandalism.

In addition, local companies provide support to community based charities and projects in their respective areas including support for employees' efforts in fund raising and for small-scale projects.

## SECTION 5 ENVIRONMENT

### *Environmental Policy*

Through our core business activities we are committed to minimising our environmental impact whilst still providing good quality, reliable and added value services to all of our customers.

We recognise the environmental impacts arising from our business activities and are committed to reducing these through effective environmental management. Our policy is to strive to achieve continual improvement in environmental performance. We are committed to:

- Preventing pollution and reducing the overall impact of our operations on the environment.
- Maintaining an internal management structure for the management of environmental issues which includes clearly defined responsibilities for environmental management capable of delivering this policy commitment.
- Complying with, and where possible always aiming to exceed applicable legal and other requirements relating to the organisation.
- Monitoring our environmental performance and setting objectives and targets for improvement providing appropriate training and awareness programmes for our staff.

Through the use of our vehicles we recognise the key role we have to play in both reducing and contributing to greenhouse gas emissions. Our commitment in this area is set out in our Climate Change Policy.

### *Climate Change Policy*

Climate change has now been recognised as an international issue with national governments committed to taking action to reduce greenhouse emissions. As a company which uses a range of motorised transport as part of our day to day business we recognise that we emit greenhouse gases from operating our vehicle fleet. At the same time we have a role in supporting governments and communities to reduce the impacts of climate change. We are committed to reducing the greenhouse gas emissions from our operations in a way which supports national government strategies and in line with our other commitments: ☐

To assess the potential impact to our business from evolving climate change policies as part of our on-going risk management processes. ☐

- To work actively with our suppliers to improve the fuel efficiency of our vehicles.
- To report annually on our greenhouse gas emissions from all vehicles and property in our ownership.
- To actively promote improved energy efficiency and fuel efficiency within our business. ☐
- To support research into transport policy and the use of alternative fuels. ☐
- To stay abreast of alternative fuel developments and continue to assess their commercial viability.

### *Biodiversity Policy*

Our policy in respect of conserving and promoting biodiversity reflects our commitment to furthering the aims of sustainable development in the management and development of our business. All businesses affect biodiversity through the use of resources and discharge of waste products. This Biodiversity Policy is therefore consistent with our broader Environmental Policy, which includes a stated commitment to minimise the environmental impacts of our operations and prevent pollution.

## CORPORATE SOCIAL RESPONSIBILITY

Our policy is to strive to enhance biodiversity where practicable. Accordingly our commitments are:

- Where we operate from sites and/or client sites which are designated as being of importance due to their natural habitats, we will work with the relevant authorities and affected parties to ensure protection of these habitats through effective pollution control measures and management plans with the aim of conserving or enhancing the biodiversity of these sites.
- We will seek to identify any of our/client sites where the potential exists for enhancing biodiversity and over time develop appropriate actions plans to achieve this.
- Where we consider it appropriate to do so, we will support the implementation of the UK Biodiversity Action Plan and Local Biodiversity Action Plans defining areas which require special protection and management to ensure that biodiversity is maintained. We will seek to do this in partnership with the relevant authorities and affected parties, who promote biodiversity on a local and national level and seek to identify ways in which we may be able to support the development of selected schemes or initiatives.