

# **Skye Guarding Policies**



## **Ethical Business Practice Policy**

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Owner	Compliance	Approved by	Managing Director	Version	3
Author	Compliance Manager	Date of Issue	01/01/2024	Related to PRO	SG-POL-21



#### 1. Purpose and Scope

This policy sets out our ethical business practices. It applies to all employees in relation to our dealings with our people, agents, clients, suppliers, subcontractors, competitors, government officials, the public and investors in all our operating countries.

#### 2. Policy Objectives

We have a duty to act responsibly and to show the highest levels of ethical and moral stewardship. The objectives of this policy are to:

- Support our commitment to be a responsible business and develop mutually beneficial and sustainable relationships with our stakeholders, based on trust and co-operation;
- Treat all our stakeholders appropriately; and
- Promote safe and fair working conditions, including the responsible management of environmental and social issues within our supply chain by ensuring our suppliers comply with our Supplier Code of Conduct, our policies, and other legal requirements. This policy should be read in conjunction with One Code – Skye Guarding's code of conduct and those concerned with finance, procurement, and sustainability.

#### 3. Responsibilities

The Managing Director is responsible for:

• Reviewing, endorsing, and achieving this policy's aims.

The Director Compliance is responsible for:

- Administering this policy on behalf of the Managing Director; and
- Developing and rolling out the supporting strategies.

Managers are responsible for:

- Implementing and enforcing the processes and procedures;
- Ensuring that their people are aware of their responsibilities and receive appropriate training;
- Reporting immediately to the Regional Managers any significant deficiencies or beaches; and
- Addressing any inappropriate behaviour.

**Employees** are responsible for:

- Carrying out their work in line with this policy and associated procedures;
- Challenging any behaviour that falls short of the expectations of this policy; and
- Identifying any breaches of this policy and reporting them to their line manager.

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#### 4. What will successful implementation of this policy achieve?

- Self-assessment and independent assurance over the robustness of the whistleblowing, anti-fraud and bribery arrangements;
- Downward trend in losses and reportable incidents arising from fraud and bribery; and
- All instances of non-compliance investigated, and appropriate action taken.

Shahid Chaudhry

Shahid Chaudhry Managing Director

Date: 01/01/2024

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