

## **Adverse Publicity Policy**

### **Purpose**

Risk Solutions recognises the importance of addressing adverse publicity about the Company itself and about the Security Industry in general. The Company strives to avoid any incidents of adverse publicity and will actively monitor the media for examples in the Security Industry so to have a response, if asked for one, and to improve its own best practice.

### **Scope**

The scope of this policy is for all staff of Risk Solutions and to be used at all times. All former employees do not have the right to speak on the behalf of or about specific incidents, processes or the Company.

### **Policy Statement**

#### Media Handling Guidelines

These guidelines give details of how reactive communications with the media should be handled within the company. They are intended to ensure consistency and accuracy, and to support all staff in creating a positive public image for the company.

#### Basic Principles

- The media should always be responded to promptly.
- Every effort should be made to provide interviews if requested, unless it is agreed that it would be inappropriate in a particular case.
- Proactive Communications.
- All media releases must be agreed by the Directors.
- Quotes in media releases must be from a Director.
- Anyone asked to authorise or comment on a media release must respond promptly to enable media deadlines to be met.

#### Reactive Communications

All media enquiries should be passed to the Directors in the first instance. If the media contacts staff or line managers they should: -

- Ask what information the journalist requires
- Take a contact name and phone number
- Confirm that someone will call them back
- Inform and pass on the information to the Directors
- Staff or line managers should NOT speculate about an issue or guess an answer
- A Director or duly approved representative will give a statement that has been agreed by the Directors.
- Social media may be used to release statements.

### **Responsibilities**

This policy will be reviewed by the Management Team annually and after every major use to ensure its effectiveness and to implement any lessons learned in a swift and timely manner. It will also be updated if the Company becomes aware of a better practice.

## **Anti-Bribery and Anti-Corruption Policy**

### **Purpose**

This anti-bribery policy exists to set out the responsibilities of Risk Solutions and those who work for us in regard to observing and upholding our zero-tolerance position on bribery and corruption. It also exists to act as a source of information and guidance for those working for Risk Solutions. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

### **Scope**

This policy applies to all employees (whether part time, short term, or permanent), consultants or any other person or persons associated with us.

### **Policy statement**

Risk Solutions is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. Risk Solutions 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.

Risk Solutions 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 regard to our conduct both at home and abroad.

Risk Solutions recognises 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.

What is and what is NOT acceptable

This section of the policy refers to 4 areas:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.

Gifts and hospitality Risk Solutions accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- a. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- b. It is not made with the suggestion that a return favour is expected.
- c. It complies with local law.
- d. It is given in the name of the company, not in an individual's name.
- e. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- f. It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- g. It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift.
- h. It is given/received openly, not secretly.
- i. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- j. It is not above a certain excessive value, as pre-determined by the company's Directors (usually £100).
- k. It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's Directors.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Directors, who will assess the circumstances.

Risk Solutions recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

As best practice, gifts given and received should always be disclosed to the Directors. Gifts from suppliers should always be disclosed.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Directors should be sought.

Facilitation Payments and Kickbacks

Risk Solutions does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

Risk Solutions does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

Risk Solutions recognises that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

- a. Keep any amount to the minimum.
- b. Ask for a receipt, detailing the amount and reason for the payment.
- c. Create a record concerning the payment.
- d. Report this incident to the Directors.

#### Political Contributions.

Risk Solutions will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

#### Charitable Contributions.

Risk Solutions accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the Directors.

#### Employee Responsibilities

As an employee of Risk Solutions you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Directors.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Risk Solutions has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

What happens if I need to raise a concern?

This section of the policy covers 3 areas:

- a. How to raise a concern.
- b. What to do if you are a victim of bribery or corruption.
- c. Protection.

**How to raise a concern** If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Risk Solutions you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to the Directors.

Risk Solutions will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

**What to do if you are a victim of bribery or corruption** You must tell the Directors as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

**Protection.** If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, Risk Solutions understands that you may feel worried about potential repercussions. Risk Solutions will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

Risk Solutions will ensure that no one suffers any detrimental treatment because of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you've been subjected to unjust treatment because of a concern or refusal to accept a bribe, you should inform your line the Directors immediately.

Communication and Training

Risk Solutions' anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.

Risk Solutions will provide relevant anti-bribery and corruption training to employees etc. where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced. As good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.

#### Record keeping

Risk Solutions will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to Directorial review.

#### **Responsibilities**

Risk Solutions' Management Team are responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the Directors.

This policy does not form part of an employee's contract of employment and Risk Solutions may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

#### **Definitions**

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 Directors.

### **Responsibilities**

This policy will be reviewed by the Management Team annually to ensure its effectiveness. It will also be updated if the Company becomes aware of a better practice.

### **Related Legislation**

Bribery Act of 2010

# Business Continuity Policy

## Purpose

This policy defines the business continuity plan and how it is implemented by Risk Solutions. It also outlines processes and procedures that can be used in the unlikely event of an emergency.

## Scope

This policy covers all facets of Risk Solutions day to day staffing, administration and business.

## Policy Statement

Risk Solutions has a business continuity policy in place that will assist in damage limitation and ensure the smooth ongoing operation of the business in the event of an emergency.

Classification of an emergency could be considered as;

- A power failure
- Bad weather
- Fire
- Severe risk escalation
- Severe lack of available employees
- Or anything else that could be considered as a crisis that may disrupt the ongoing operation of the business.

This policy will only work in the event of an emergency if there is a significant ongoing effort put in place to safeguard the company files and information. This is done by:

- All computer systems are backed up on a weekly basis and copied to cloud storage.
- The rota is kept in the cloud.
- An up to date list of staff contacts is kept in the cloud.
- A basic level of staff details is kept in the cloud.
- All employees having at least one of the management team's mobile phone number.

This allows a continuity of deployment regardless of which member of the management team is in operational control.

For other high value systems the following points are implemented:

- Payroll is web based and records are backed up every week.
- Invoicing records are backed up every week.
- Risk Solutions quality management system and data is stored in the cloud.
- All staff SIA badges are stored on the SIA website in the Company's section.
- Bank accounts can be accessed and monitored online.

In the unlikely event of all hard copies of Risk Solutions paperwork being lost there should be enough information stored by other methods for files to be rebuilt within a reasonable time frame.

Directors and staff have a working knowledge of all the above systems to avert a crisis in the event of one person being unavailable. The organisation operates with a £40,000 isolated capital reserve fund to allow the continuation of service in the event of emergencies.

### Management Team

In the event of an emergency, where the company needs to revert to the use of this policy, the following persons are to be contacted immediately:

Bary Lynch – 07970 796 401  
Gary Parker – 07944 930 984  
Richard Toth – 07720 346 592  
Slawomir Czarnik – 07471 811 817

### Premises

In the event of a premises emergency where there is cause to evacuate the office with immediate effect, then the business can move to pilot premises/office at Petersfield. Key members of staff can work from home or any location given the use of laptops and mobile phones.

Decision by the above listed senior Managers will be made at the time of any such need.

### **Responsibilities**

This policy will be reviewed by the Management Team annually and after every major use to ensure its effectiveness and to implement any lessons learned in a swift and timely manner. It will also be updated if the Company becomes aware of a better practice.

## Clean Desk Policy

### Purpose

The purpose for this policy is to establish the minimum requirements for maintaining a “clean desk” – where sensitive/critical information about our employees, our intellectual property and our customers is secure in locked areas and out of sight. A Clean Desk policy is not only ISO 27001/17799 compliant, but it is also part of standard basic privacy controls.

### Scope

This policy applies to all Risk Solutions employees and affiliates.

### Policy

- Employees are required to ensure that all sensitive/confidential information in hardcopy or electronic form is secure in their work area at the end of the day and when they are expected to be gone for an extended period.
- Computer workstations must be locked when workspace is unoccupied.
- Computer workstations must be shut completely down at the end of the work day.
- Any Restricted or Sensitive information must be removed from the desk and locked in a drawer when the desk is unoccupied and at the end of the work day.
- File cabinets containing Restricted or Sensitive information must be kept closed and locked when not in use or when not attended.
- Keys used for access to Restricted or Sensitive information must not be left at an unattended desk.
- Laptops must be either locked with a locking cable, locked away in a drawer or secured off site.
- Passwords may not be left on sticky notes posted on or under a computer, nor may they be left written down in an accessible location.
- Printouts containing Restricted or Sensitive information should be immediately removed from the printer.
- Upon disposal Restricted and/or Sensitive documents should be shredded in the official shredder bins or placed in the lock confidential disposal bins.
- Whiteboards containing Restricted and/or Sensitive information should be erased.
- Lock away portable computing devices such as laptops and tablets.
- Treat mass storage devices such as CDROM, DVD or USB drives as sensitive and secured.
- All printers and fax machines should be cleared of papers as soon as they are printed; this helps ensure that sensitive documents are not left in printer trays for the wrong person to pick up.

### Responsibilities

This policy will be reviewed annual and if any major breaches occur. The policy will also be updated if the Company discover better practice.

## **Corporate social responsibility policy**

### **Purpose**

The policy refers to our responsibility toward our environment. Risk Solution's existence is not lonely. It's part of a bigger system of people, values, other organisations and environment. The social responsibility of a business is to give back to the world just as it gives to us.

### **Scope**

This policy applies to the Company, employees and contractors. It may also refer to suppliers, partners and stakeholders.

### **Policy Statement**

We want to be a responsible business that meets the highest standards of ethics and professionalism. The Company's social responsibility falls under two categories: compliance and proactiveness. Compliance refers to the Company's commitment to legality and willingness to observe community values. Proactiveness is every initiative to promote human rights, help communities and protect the environment.

Compliance

Legality

The Company will:

- Respect the law
- Honour its internal policies
- Ensure that all its business operations are legitimate
- Keep every partnership and collaboration open and transparent

Business ethics

We'll always conduct business with integrity and respect to human rights. We'll promote:

- Safety and fair dealing
- Respect toward the customer and consumer
- Anti-bribery, anti-corruption and anti-fraud practices

Examples of Corporate Social Responsibility

Protecting the environment

The company recognises the need to protect the environment. Keeping the environment clean and unpolluted is a benefit to all. We'll always follow best practices when recycling, waste disposal and procurement. We encourage all staff to car share, minimise the use of resources and the impact on the environment whenever possible.

## Protecting people

We'll ensure that we:

- Don't risk the health and safety of employees and community.
- Support diversity and inclusion.

## Human rights

The company is dedicated to protecting human rights. We are a committed equal opportunity employer. We'll ensure that our activities do not directly or indirectly violate human rights in any country.

## Proactiveness

## Charity

The company has a designated charity The Isobel Kelly Fund. More details can be found here: [www.thebraintumourcharity.org/get-involved/our-supporter-groups/supporter-groups/groups/the-isobel-kelley-fund/](http://www.thebraintumourcharity.org/get-involved/our-supporter-groups/supporter-groups/groups/the-isobel-kelley-fund/)

## First Aid

All staff will offer first aid and assistance to all members of the public not just consumers and customers. We will also work closely with any Street Pastor schemes where they exist.

We'll readily act to promote our identity as a socially aware and responsible business. Management must communicate this policy on all levels. Managers are also responsible for resolving any CSR issues.

## **Responsibilities**

This policy will be reviewed annually by the Management Team. It was also be updated when the Company becomes aware of better practice.

# Counter Terrorism Policy

## Purpose

The aim of this policy is to limit the impact of a terrorist attack on our employees, customers and consumers also to promote a culture of employee awareness of the methodology of preventing them. This will be achieved by using the methods stated below.

## Scope

This policy will be followed by all employees, contractors and customers.

## Policy Statement

### Training

- This will be offered to all staff from a variety of sources i.e. Project Griffin, Project Argus and in house continued professional development.

### Due Diligence

- Venues must be checked for suspect packages and devices at the start and end of the shift and during the time the venue is operating as part of routine patrols.
- The immediate area surrounding the venue is to be observed and all suspicious activity and objects to be recorded and reported to venue management and relevant authorities.
- The integrity of the venue is to be maintained by regular inspections of fire exits, prevention of unauthorised entry via irregular routes and selection and searching of attendees to the event.
- All suspicions should be reported to the venue management and, if deemed credible, to the Anti-Terrorist Hotline **0800 789 321**.

### Awareness

- All staff should be aware of national, regional and local Terrorist Threat Level and be open to information from any available source. All staff will be aware of customer's or venue's Counter Terrorism Policy and their role in it.

## Responsibilities

This policy will be reviewed annually and whenever there is a major incident, by the Management Team, and will be implemented as soon as possible to make the most of the lessons learned. It will also be updated as soon as the Company is aware of better practice.

## **Fraud Policy**

### **Purpose**

The corporate fraud policy is established to facilitate the development of controls that will aid in the detection and prevention of fraud against Risk Solutions. It is the intent of Risk Solutions to promote consistent organisational behaviour by providing guidelines and assigning responsibility for the development of controls and conduct of investigations.

### **Scope**

This policy applies to any irregularity, or suspected irregularity, involving employees, consultants, contractors, outside agencies doing business with employees of such agencies, and/or any other parties with a business relationship with Risk Solutions (also called the Company). Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship to the Company.

### **Policy Statement**

Management is responsible for the detection and prevention of fraud, misappropriations, and other irregularities. Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to their injury. Each member of the management team will be familiar with the types of improprieties that might occur within his or her area of responsibility and be alert for any indication of irregularity. Any irregularity that is detected or suspected must be reported immediately to the Directors, who coordinate all investigations with other affected areas, both internal and external.

### **Actions Constituting Fraud**

The terms defalcation, misappropriation, and other fiscal irregularities refer to, but are not limited to:

- Any dishonest or fraudulent act
- Misappropriation of funds, securities, supplies, or other assets
- Impropriety in the handling or reporting of money or financial transactions
- Profiteering as a result of insider knowledge of company activities
- Disclosing confidential and proprietary information to outside parties
- Disclosing to other persons securities activities engaged in or contemplated by the company
- Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to the Company. Exception: Gifts less than £100 in value.
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; and/or

- Any similar or related irregularity

### Other Irregularities

Irregularities concerning an employee's moral, ethical, or behavioural conduct should be resolved by line managers. If there is any question as to whether an action constitutes fraud, contact the Directors for guidance.

### Investigation Responsibilities

The Directors have the primary responsibility for the investigation of all suspected fraudulent acts as defined in the policy. If the investigation substantiates that fraudulent activities have occurred, the Directors will issue reports to appropriate designated personnel. Decisions to prosecute or refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made in conjunction with legal counsel as will final decisions on disposition of the case.

### Confidentiality

The Directors treat all information received confidentially. Any employee who suspects dishonest or fraudulent activity will notify the Directors immediately and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act (see REPORTING PROCEDURE section below). Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect the Company from potential civil liability.

### Authorisation for Investigating

Members of the Investigation will have:

- Free and unrestricted access to all Company records and premises, whether owned or rented.
- Free and unrestricted access to all customer venues.
- The authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who might use or have custody of any such items or facilities when it is within the scope of their investigation.

### Reporting Procedures

Great care must be taken in the investigation of suspected improprieties or irregularities so as to avoid mistaken accusations or alerting suspected individuals that an investigation is under way. An employee who discovers or suspects fraudulent activity will contact the Directors immediately. The employee or other complainant may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual, his or her attorney or representative, or any other inquirer should be directed to the Investigators. No information concerning the status of an investigation will be given out. The proper response to any inquiries is: "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation," "the crime," "the fraud," "the forgery," "the misappropriation," or any other specific reference. The reporting individual should be informed of the following:

- Do not contact the suspected individual in an effort to determine facts or demand restitution.

- Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the Directors.

#### Termination

If an investigation results in a recommendation to terminate an individual, the recommendation may be reviewed for approval by outside counsel, before any such action is taken.

#### **Responsibilities**

The Directors are responsible for the administration, revision, interpretation, and application of this policy. The policy will be reviewed annually and revised as needed.

## **Staff Communication Policy**

### **Purpose**

Risk Solutions is committed to a productive and satisfying work environment that operates efficiently and effectively. The Company believes clear, respectful, accurate, truthful and timely workplace communication between the Directors, Line Managers, Head Door Supervisor and Door Supervisors is very important.

This policy is intended to provide a framework for good communication within the work environment of the Risk Solutions. The purpose is to ensure Directors, Line Managers, Head Door Supervisors and Door Supervisors are well informed, understand how the Company operates, support each other, carry out their daily tasks efficiently and effectively, and the strategic vision it is working towards.

### **Scope**

This policy applies to workplace communication between Directors, Line Managers, Head Door Supervisors and Door Supervisors. The policy does not apply to communication with Consumers, Customers, stakeholders or the media.

This policy should be read in conjunction with the Staff Handbook.

### **Policy**

Risk Solutions will ensure Directors, Line Managers, Head Door Supervisors and Door Supervisors are fully and accurately informed in a timely way of all relevant activities, policies, issues and plans to enable them to be as effective as possible in their role.

The Company will ensure that Directors, Line Managers, Head Door Supervisors and Door Supervisors are aware of their responsibility to develop and maintain good communication practice.

The Company will monitor and improve as necessary its procedures for what, to whom, how and when information is disseminated. The principle of a two way flow of information and discussion will be incorporated in communication procedures, providing for feedback and sharing of opinions.

Workplace communication will be conducted free of discrimination, harassment and bullying. Workplace communication will be respectful of confidentiality and privacy.

### **Procedures**

#### **Generally**

Directors, Line Managers, Head Door Supervisors and Door Supervisors are informed of the current Company strategic plan and its key objectives.

Prepare written information in plain English.

Provide information using options such as, but not necessarily limited to:

- Regular staff meetings
- Forums
- One to one meetings
- Email notices/newsletters
- Electronic diary
- Phone calls
- Phone messaging
- Social media
- Notice boards
- Policies
- Handbooks and Instruction Manuals

Give preference to face to face communication or the telephone as the main means of communication.

Prepare, or otherwise provide, Staff Handbook, instruction manuals and Policies make them readily available to Directors, Line Managers, Head Door Supervisors and Door Supervisors.

#### Director Roles and Responsibilities

- Keep the Line Managers, Head Door Supervisors and Door Supervisors up-to-date in a timely manner with the requirements, change of policy and decisions of the Directors.
- Share important information and issues in a timely and accurate manner with Line Managers, Head Door Supervisors and Door Supervisors.
- Communicate all workplace relevant matters to Line Managers, Head Door Supervisors and Door Supervisors.
- Directors are free to communicate with all levels of the Company.

#### Line Managers Roles and Responsibilities

- Conduct a staff development and performance discussion process with each staff member at least once each year.
- Actively provide accurate, relevant and up-to-date information to staff.
- Ensure that staff views are heard and considered.
- Use consistent, regular and open methods for delivering information and obtaining the views of staff.
- Hold regular staff meetings.
- Brief staff on relevant updates.

#### Head Door Supervisors and Door Supervisors Roles and Responsibilities

- Notify the relevant people if information appears inaccurate or unclear.
- Provide accurate and timely information on any matter in which you are involved or become aware of to all relevant people.
- Ensure that all information is correct and truthful to the best of their knowledge.

### **Responsibilities**

This policy will be reviewed by the Management Team annually to ensure its effectiveness and to implement any lessons learned in a swift and timely manner. It will also be updated if the Company becomes aware of a better practice.

### **Definitions**

Workplace communication refers to the workplace exchange of information and the discussion of issues relevant to the operations of the Company by the Directors, Line Managers, Head Door Supervisors and Door Supervisors. It can be through both overt means such as official meetings, discussions, emails, reports and the like and more casual forms of day to day communication.

## **Philosophy Policy**

### **Purpose**

This policy is to outline the ethos that Risk Solutions works towards and our outlook towards our consumers, customers and employees.

### **Scope**

This policy covers all staff, customers, consumers and anyone that comes into contact or has dealings with Risk Solutions.

### **Policy Statement**

#### Our Mission

- Achieve the highest standard of customer service by offering the best quality for great value.
- Support our employees to recognise and develop their potential.
- Exceed our turnover targets and generate the right margin of profit.

#### Our Values

- Offer courtesy and care to all our staff, consumers and customers.
- Offer quality and value for money.
- Develop our integrity and independence.

#### Our Commitment to Our Staff

The Company is committed to support its employees by these principles:

- Allow staff to meet their work and personal objectives.
- Maximise employee's development as an individual and as part of a team.
- Ensure that our working environment is safe and healthy and attractive.

### **Responsibilities**

This policy will be reviewed by the Management Team annually to ensure its relevance and accuracy. It will also be updated if the Company becomes aware of better practice.

## **Consumer Relations Policy**

### **Purpose**

This policy is to outline best practice for Risk Solutions interactions with consumers.

### **Scope**

This policy covers all staff and all interactions with consumers.

### **Policy Statement**

The success of our business depends upon the satisfaction of our consumers. This involves:

- Providing efficient and courteous service, politeness and warmth of personality.
- Well-groomed and presentable employees.
- In the case of a complaint try your best to solve it.
- Involve your Line Manager if you cannot solve the issue.
- If the Line Manager cannot solve it then refer them to the Office.
- Don't let the "It's not my job" syndrome get to you.
- Go for maximum consumer satisfaction.

### **Responsibilities**

This policy will be reviewed by the Management Team annually to ensure its effectiveness. It will also be updated if the Company becomes aware of a better practice.

## **Equal Opportunities Policy**

### **Purpose**

This policy governs Risk Solutions behaviour regarding protected characteristics.

### **Scope**

This policy covers the Company, its employees, customers, consumers and the public. It covers the Company's dealings with its employees and the employees interactions with customer, consumers and the public.

### **Policy Statement**

Risk Solutions wholehearted supports the principle of Equal Opportunities and diversity in the workplace and opposes all forms of unlawful discrimination on grounds of colour, nationality, ethnic or national origin, sex, marital status, disability, sexual orientation, religion, belief, age, pregnancy or HIV status. The Company believes that it is in the Company's and the employees best interests to ensure that the people, talents and skills available throughout the community are considered when employment opportunities arise. To this end, we are committed, wherever practicable to achieving and maintaining a work force that broadly reflects the local community in which we operate.

Every possible step will be taken to ensure that individuals are treated equally and fairly and that decisions on recruitment, training and career management are based solely on objective and job related criteria. Our consumers, customers and members of the public whilst on or near our venues must also be treated fairly and with respect.

### **Responsibilities**

This policy will be reviewed by the Management Team annually to ensure its effectiveness. It will also be updated if the Company becomes aware of a better practice.

## **Anti-Discrimination Policy**

### **Purpose**

The purpose of this policy is to comply with and exceed the protection as afforded by the Equality Act of 2010. Risk Solutions believes that treating everyone fairly and with respect creates a better work environment. It also makes a more conducive environment for an enjoyable experience for consumers.

### **Scope**

This policy applies to all Risk Solutions staff while on and off duty. If an employee is accused of an offence under the Equality Act of 2010 they will be investigated and may have their employment terminated. It also applies to all situations that staff witness whether it involves customers, consumers or the public in or out of the venue.

### **Policy Statement**

Risk Solutions wholeheartedly support the principle of Equal Opportunities and members of staff are required by law to comply with Anti-Discrimination Legislation including behaviour towards other employees, consumers and customers. Ignorance of the law is no defence. Both the Company and the employee can be held liable if they are in breach of the Discrimination Legislation on the following grounds:

- Colour.
- Nationality.
- Ethnic or national origin.
- Sex.
- Marital status.
- Disability.
- Sexual orientation.
- Religion.
- Belief.
- Age.
- HIV status.

As an employee you have a responsibility to bring to the attention of your Line Manager the behaviour of any persons that may be deemed to be acting in an inappropriate manner.

### **Responsibilities**

This policy will be reviewed by the Management Team annually to ensure its effectiveness. It will also be updated if the Company becomes aware of a better practice.

### **Responsibilities**

This policy will be reviewed by the Management Team annually to ensure its effectiveness. It will also be updated if the Company becomes aware of a better practice.

### **Legislation**

Equality Act of 2010

## **Sexual Harassment Policy**

### **Purpose**

The purpose of this policy is to create a positive and productive work environment where everyone feels safe. Also to create an environment where consumers can have an enjoyable experience of customer's venue.

### **Scope**

This policy applies to all Risk Solutions staff while on and off duty. If an employee is accused of an offence involving Sexual Harassment they will be investigated and may have their employment terminated. It also applies to all situations that staff witness whether it involves customers, consumers or the public in or out of the venue.

### **Policy Statement**

Risk Solutions will not permit or condone Sexual Harassment. Sexual Harassment is defined as unwanted conduct of a sexual nature when it has the purpose or effect of violating the dignity of a worker or creating an intimidating, hostile, degrading, humiliating or offensive environment. This can happen in a number of ways including, but not limited to, written or verbal comments of a sexual nature, displaying pornographic or explicit images, emails with content of a sexual nature, unwanted physical contact and touching or sexual assault.

Sexual Harassment can happen to anyone at any time in any place. Some types, such as sexual assault and other physical threats are a criminal as well as an employment matter. As such they should be reported to the Police. A complaint of Sexual Harassment should be brought using the same mechanism as the Grievance Procedure, it is recommended that you should go straight to Stage 3 and a Director. Sexual Harassment will be treated as an act of Gross Misconduct and dealt with in line the procedures outlined in this Handbook.

If an act of Sexual Harassment is witnessed by a Risk Solutions employee they are duty bound to intervene whether the parties involved are consumers, customers or public and if it has occurred in or outside of the venue.

### **Responsibilities**

This policy will be reviewed by the Management Team annually to ensure its effectiveness. It will also be updated if the Company becomes aware of a better practice.

### **Legislation**

Equality Act of 2010

## **Harassment and Bullying Policy**

### **Purpose**

The purpose of this statement is to indicate to employees the type of behaviour that is totally unacceptable and to explain what options there are to employees who may suffer Harassment or Bullying. Risk Solutions intends to provide a neutral working environment in which employees do not feel threatened or intimidated. Harassment is a discriminatory act and is also a criminal offence.

### **Scope**

This policy applies to all Risk Solutions staff while on and off duty. It also applies to all situations that staff witness whether it involves customers, consumers or the public in or out of the venue.

### **Policy Statement**

Risk Solutions will not tolerate any form of Harassment or Bullying on any grounds including colour, nationality, ethnic or national origin, sex, marital status, pregnancy, disability, sexual orientation, age, religion or belief.

Bullying is offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying can include the use of personal strength or the power to coerce through fear or intimidation, not necessarily from someone in a position of authority. Bullying may be physical, verbal or non-verbal. It can include conduct that is not face-to-face, including via text message, email and social media. Examples of bullying include but not limited to:

- physical or psychological threats;
- overbearing and intimidating levels of supervision;
- inappropriate derogatory remarks about a person or their performance;
- shouting at staff;
- persistently picking on people in front of others or in private;
- blocking promotion and training opportunities;
- regularly and deliberately ignoring or excluding staff from work activities or work related social events;
- setting a person up to fail by overloading them with work or setting impossible deadlines;
- regularly making the same person the butt of jokes.

Legitimate and reasonable criticism of a staff member's performance or behaviour, or reasonable management instructions, do not amount to bullying.

If you believe you are faced with Harassment or Bullying you should bring it to the attention of your Line Manager as detailed in the Grievance Procedure.

### **Responsibilities**

This policy will be reviewed by the Management Team annually to ensure its effectiveness. It will also be updated if the Company becomes aware of a better practice.

## **Alcohol, Drugs and Substance Abuse Policy**

### **Purpose**

The purpose of this policy is to outline employees responsibilities towards the Company, customer and consumers in and out of work hours and how they should react to specific situations.

### **Scope**

The policy covers all consumers and venues were Risk Solutions operate. We expect high standards from all our employees. These rules are applicable to every employee in or out of work.

### **Policy Statement**

Risk Solutions philosophy is very clearly defined. We disapprove of drug misuse and its associated culture. We make no concession which will encourage consumers or employees who want to use our premises for such purposes. Whilst we will offer care and assistance to any consumer in trouble Any person in possession of drugs will be removed from our premises. It is policy to have any person who is in the possession of or tries to sell drugs reported to or arrested by the Police, in accordance with the local Police policy.

#### **Alcohol**

The Policy is to forbid the consumption of alcohol by employees whilst on Company business. Any employee who is found consuming alcohol on a site or is found to be intoxicated at work will face action under the Disciplinary Procedure. If an employee arrives for work under the influence of alcohol the Company reserves the right not to allow the employee to remain on the site and suspend pending investigation which could end in Disciplinary action.

#### **Drugs / Substances**

The Company will not employ any known illegal drug user or trafficker. Being under the influence, in possession or distribution of non-prescribed or prescribed drugs for non-medical purposes when on company business is strictly forbidden.

The Company reserves the right to search you or any of your property held on Company or customer premises and any motor vehicle in your possession or control if there is reasonable to believe that our Policy is or has been infringed. The search will be carried out in accordance with the Company's rules. They can be found in this

Handbook. All employees are required to support the Company by reporting to their Line Manager any drug use or trafficking on Company or Customer's premises.

If it is believed an employee arrives for work under the influence of drugs the Company reserves the right not to allow the employee to remain on the premises and to suspend them pending an investigation which could lead to disciplinary action. The employee maybe asked for a drugs test and a refusal may lead to further disciplinary action and dismissal.

If you are prescribed drugs by your doctor that may affect your ability to work in any way you must discuss this with your Line Manager.

### General

Any employee arrested or drug, substance or alcohol related offences, even out of work, will be considered in breach of the Company's Policy. Risk Solutions may proceed to deal with the matter under the terms of its Disciplinary Procedure and Summary Dismissal is a possible result. Any employee who suspects another of drug, substance or alcohol misuse must report this to their Line Manager.

If the Company suspects that you have breached the Alcohol, Drugs and Substance Policy you maybe required to undergo a medical examination in line with the procedure. If you refuse the medical examination it will normally be treated as Gross Misconduct and result in disciplinary action under the Company's Disciplinary Procedure. As part of its employee development programme the Company will endeavour to educate and inform employees about the consequences of alcohol, drug and substance abuse.

### **Responsibilities**

This policy will be reviewed by the Management Team annually to ensure its effectiveness. It will also be updated if the Company becomes aware of a better practice.

# Smoking Policy

## **Purpose**

The purpose of this policy is to outline where smoking is and isn't allowed.

## **Scope**

This policy covers all Risk Solutions staff, customers and consumers.

## **Policy Statement**

It is illegal to smoke in enclosed public places which includes licensed premises for both consumers and employees. During breaks you maybe allowed to smoke. This can only be done in designated areas that are out of the view of the public and consumers. Failure to comply with this policy may lead to disciplinary procedures.

## **Responsibilities**

This policy will be reviewed by the Management Team annually to ensure its effectiveness. It will also be updated if the Company becomes aware of a better practice.

## **Legislation**

Health Act of 2006

## **Redundancy Policy**

### **Purpose**

The aim of this policy is to clarify what procedures will be followed in the event of redundancies becoming unavoidable in the company. Every effort will be made to ensure that redundancies will be avoided, but we have to accept that there could be circumstances beyond the company's control, which could result in a reduced demand for our services.

### **Scope**

This policy covers all employees of Risk Solutions.

### **Policy Statement**

Whilst it is the Company's intention to continue to develop and expand its business activities and thus provide a stable work environment and reasonable security of employment. It must ensure economic viability of the enterprise in an increasingly competitive business environment. In this respect circumstance may arise where changes in the market, technology or organisational requirements necessitate the need for reductions in staffing levels leading to redundancies. The Company will endeavour to minimise the impact wherever possible.

### **Lay Off / Short Time Working**

The Company reserves the right to Lay Off employees or put them on Short Time Working subject to the provision of the Employment Rights Act of 1996 in relation to guaranteed pay. Employees must be prepared to accept alternative work if their work is temporarily unavailable.

### **Responsibilities**

This policy will be reviewed by the Management Team annually to ensure its effectiveness. It will also be updated if the Company becomes aware of a better practice.

### **Legislation**

Employment Rights Act of 1996

## **Training and Development Policy**

### **Purpose**

The continued success of Risk Solutions depends on the quality of our employees. We therefore energetically support work related training and development for all employees. All training and development activities have been integrated into the Company's current and future business plans and we may involve colleges of further education and other external agencies as appropriate. The aim of the training is to enable all employees to work effectively and develop their potential.

### **Scope**

This policy applies to all permanent, full-time or part-time, employees of the company. This policy also covers other interested parties such as customers and stakeholders who may, from time to time, wish to participate in or host training sessions.

### **Policy Statement**

Staff will be required to attend training sessions from time to time as specified by Risk Solutions. The training includes Induction, Company Procedures, Health and Safety, Fire, Operating Standards and Refresher Courses. Many of them are statutory requirements covering various aspects of the Security trade and employees will be expected to comply with these requests. Some venues may require specific training before it is possible to work at them. This must be completed before commencement.

Development opportunities and non-compulsory courses will be discussed during annual appraisals or at one to one meetings by request of the employee. Risk Solutions will be vigilant with regards to putting forward employees for development opportunities within the Company.

We rely on our staff to attract new custom and to keep our existing consumers coming back to the venues because of this it is essential that employees always participate fully in training activities.

### **Responsibilities**

This policy will be reviewed by the Management Team annually to ensure its effectiveness. It will also be updated if the Company becomes aware of a better practice.

# Confidentiality Policy

## Purpose

The purpose of this policy is to outline what is to be treated as confidential and how it should be handled.

## Scope

This policy covers all employees of Risk Solutions whether they believe they access to confidential information or not.

## Policy Statement

Confidential and proprietary information is secret, valuable, expensive and/or easily replicated. Common examples of confidential information are:

- Unpublished financial information
- Data of Customers/Partners/Vendors
- New technologies
- Customer lists (existing and prospective)
- Data entrusted to the company by external parties
- Pricing/marketing and other undisclosed strategies
- Documents and processes used by the company
- Unpublished goals, forecasts and initiatives marked as confidential
- Information regarding incidents and occurrences.

Employees may have various levels of authorized access to confidential information.

What employees should do:

- Lock or secure confidential information at all times
- Shred confidential documents when they're no longer needed
- Make sure they only view confidential information on secure devices
- Only disclose information to other employees when it's necessary and authorised
- Keep confidential documents inside the company's premises unless it's absolutely necessary to move them

What employees shouldn't do:

- Use confidential information for any personal benefit or profit
- Disclose confidential information to anyone outside of the company
- Replicate confidential documents and files and store them on insecure devices

When employees stop working for the company, they're obliged to return any confidential files and delete them from their personal devices.

### Confidentiality Measures

We'll take measures to ensure that confidential information is well protected. We'll:

- Store and lock paper documents
- Encrypt electronic information and safeguard databases
- Ask for authorisation by senior management to allow employees to access certain confidential information

### Exceptions

Confidential information may occasionally have to be disclosed for legitimate reasons. Examples are:

- If a regulatory body requests it as part of an investigation or audit
- If the company examines a venture or partnership that requires disclosing some information (within legal boundaries)

In such cases, employees involved should document their disclosure procedure and collect all needed authorisations. We're bound to avoid disclosing more information than needed.

### Responsibilities

This policy will be reviewed by the Management Team annually to ensure its effectiveness. It will also be updated if the Company becomes aware of a better practice.

## **Anti-Slavery and human trafficking policy**

### **Purpose**

This policy is to outline the Company's position on modern slavery and human trafficking and the steps it takes to prevent them.

### **Scope**

This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, contractors and consultants.

### **Policy Statement**

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers, including children. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

The Company has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business.

The Company also expects the same high standards from all of its suppliers, contractors and other business partners and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify the directors. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business as soon as possible. You can also contact the Government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business.

### **Responsibilities**

This policy will be reviewed annually by the Management Team. It was also be updated when the Company becomes aware of better practice.

## **Health and Safety Policy**

### **Purpose**

The purpose of this document is to define the Health and Safety Policy of Risk Solutions.

### **Scope**

Health and Safety is everyone's responsibility, however the Directors assume ultimate responsibility with the Company. The Management Team oversee the working environment to make sure it is healthy and safe. The employees have a role to play by reporting any issues or concerns they have.

### **Policy Statement**

The Company recognises and accepts its legal and moral responsibilities for the health, safety and welfare of its employees, customers and consumers as well as the health and safety of the wider public who may be affected by its activities.

The Company will act in a proactive way by assessing risks and, wherever possible, reduce hazards by training, equipment or new procedures. Where practically possible the Company will strive to exceed the standards set by legislation but this can only be done if everyone communicates effectively. Whether it is the Directors and Management Team disseminating information and training to the employees or the employees voicing issues and concerns to the Company.

### **Responsibilities**

This policy will be reviewed by the Management Team annually to ensure its effectiveness or if it has a major use. It will also be updated if the Company becomes aware of a better practice.

### **Legislation**

Health and Safety at Work Act 1974