

CODE OF BUSINESS ETHICS

1. APPROACH

- 1.1. This Code of Business Ethics sets out the standards we expect from the Company's employees in their internal and external dealings with colleagues, clients, stakeholders and third parties.
- 1.2. The Company's approach to all tasks and assignments is based on sound ethical principles – from the Company's principled sourcing of goods and services to the way we conduct ourselves whilst looking after entire client portfolio.
- 1.3. We recognise that every task and assignment provides an opportunity to review and develop the Company's services, ensuring that client satisfaction remains at the forefront.
- 1.4. We expect that all of its business is conducted in compliance with the highest ethical standards of business practice, and we apply these standards to all dealings with employees, clients, suppliers, contractors and other stakeholders.
- 1.5. The Company's policy is to operate within applicable laws. Discrimination or harassment of any kind will not be accepted. No bribes or facilitation payments of any kind shall be given or received, and we insist on total compliance to confidentiality and commitment to the Company's clients.
- 1.6. Appropriate ethical behaviour is reviewed as part of the Company's internal control process.

2. ACS ACCREDITATION

- 2.1. As a company strive to enhance the reputation of the security industry, from being one of the first organisations to support the introduction of the Private Security Industry Act, to the Company's enthusiastic embrace of the SIA Approved Contractor Scheme (ACS).
- 2.2. Part of the Company's undertaking to deliver the highest possible level of professional services, is reflected in the Company's ACS accreditation achievement which reinforces the Company's commitment to enhancing the image of the security industry through safeguarding employee rights, protecting the environment and by giving something back to the community.
- 2.3. ACS accreditation informs the Company's clients that we have embraced the most stringent quality criteria in the security service industry, secure in the knowledge that MIRIS International is fully qualified to protect clients' interests, conforming to the maximum ideals, in terms of quality and professionalism.

3. BASIC STANDARDS OF CONDUCT

- 3.1. We conduct every aspect of the Company's business with honesty, integrity and openness, respecting human rights and the interests of the Company's employees, clients and third parties.
- 3.2. We respect the legitimate interests of third parties with whom we have dealings.
- 3.3. We maintain the highest standards of integrity and will not promise more than we can reasonably deliver or make commitments we are unable to deliver.

4. EMPLOYEES

We are committed to:

- 4.1. developing a workforce where there is mutual trust and respect, free from bullying and harassment, where every person feels responsible for the performance and reputation of the Company;
- 4.2. respecting the rights of individuals, their customs and traditions and their right to freedom of association;
- 4.3. recruiting, employing and promoting employees on the basis of objective criteria and the qualifications and abilities needed for the job to be performed in line with the Company's Equal Opportunities Policy;
- 4.4. maintaining good communications with employees through the Company's information and consultation procedures;
- 4.5. providing the Company's employees with suitable training and assisting them in realising their potential;
- 4.6. ensuring the privacy and confidentiality of the Company's employees' personal information is respected;
- 4.7. suitably rewarding the Company's employees for their contribution to the success of the business;
- 4.8. providing mechanisms whereby employees can raise legitimate concerns confidentially regarding malpractice and ensuring no one will be victimised for a report made in good faith;
- 4.9. providing employees with the appropriate information and training to comply with this Code and the associated policies; and
- 4.10. seeking to protect the Company's employees from third party abuse that might be injurious to their safety, health or well-being.

5. BUSINESS INTEGRITY

- 5.1. We develop strong relationships with the Company's clients, suppliers, stakeholders and others with whom we have dealings, based on mutual trust, understanding and respect.
- 5.2. In those dealings, we expect those with whom we do business to adhere to business principles consistent with the Company's own principles.
- 5.3. The Company conducts operations in accordance with the principles of fair competition and applicable regulations.
- 5.4. The Company's accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transaction.
- 5.5. No unrecorded account, fund or asset will be established or maintained.

- 5.6. We comply with the laws and regulations applicable wherever we do business. We will obtain legal advice where felt necessary to comply with this commitment.
- 5.7. We review and track the Company's business risks including social and environmental risks.
- 5.8. The company will not facilitate, support, tolerate or condone any form of money laundering.
- 5.9. To ensure that the Company is run in an ethical and effective manner we maintain internal controls in line with the company's minimum standards of business control.

6. NATIONAL AND INTERNATIONAL TRADE

- 6.1. We seek to compete fairly and ethically within the framework of applicable competition and anti-trust laws and we do not prevent others from competing fairly with us.
- 6.2. We comply with all applicable export control laws and sanctions when conducting business around the world.

7. PERSONAL CONDUCT

- 7.1. All employees are expected to behave in accordance with the principles set out in this Code.
- 7.2. Employees are expected to protect and not misuse company assets such as buildings, vehicles, equipment, cash and procurement cards.
- 7.3. Employees are expected to use e-mail, internet, IT and telephones in a manner appropriate for business purposes in line with the principles contained in this Code and applicable IT policies.

8. BRIBERY

- 8.1. No Company employee or individual or business working on its behalf must accept or give a bribe, facilitation payment or other improper payment for any reason. This applies to transactions with government officials, any private company or person anywhere in the world. It also applies whether the payment is made or received directly or through a third party.
- 8.2. The Company shall ensure that adequate procedures are in place to prevent the risk of bribery and that these are effectively communicated and implemented across the Company in line with the requirements of the Bribery Act 2010.

9. GIFTS, ENTERTAINMENT AND IMPROPER PAYMENTS

- 9.1. Accepting or giving any entertainment or gift that is designed to, or may be seen to influence business decisions, is not acceptable. No employee shall offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with the Chief Executive Officer.
- 9.2. Any gift or hospitality given or received by an employee with an estimated value of £50 or more should be reported to the Chief Executive Officer for inclusion in the Company Gifts and Hospitality

Register.

10. CONFLICT OF INTEREST

- 10.1. Whilst we respect the privacy of employees, all Company employees are expected to avoid personal relations, activities and financial interests which could conflict with their responsibilities to the Company.
- 10.2. Company employees and consultants must not seek gain for themselves or others through misuse of their positions or company property.
- 10.3. 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 the Chief Executive Officer.

11. CONFIDENTIALITY

- 11.1. 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.
- 11.2. Where confidential information is obtained in the course of business that confidentiality must be respected.

12. POLITICAL ACTIVITY

- 12.1. The Company does not make any donations to political parties or take part in party politics. However, when dealing with Government we do make legitimate concerns known and will seek to influence Government in relation to issues that could affect us, the Company's shareholders, clients or the local community. These relationships are conducted in accordance with this Code.

13. HEALTH AND SAFETY

- 13.1. We are committed to creating and maintaining a safe and healthy working environment for the Company's employees, clients and the community.
- 13.2. The Company's commitment to ensuring the safety and security of employees is set out in the Company's Health and Safety Policy.
- 13.3. We strive to avoid emergency situations but recognise the need to be prepared. We are committed to having effective emergency response procedures in place.

14. THE ENVIRONMENT

- 14.1. The Company is committed to making continuous improvement in the management of its environmental impact as set out in the Company's Environmental Policy.
- 14.2. All employees are expected to adhere to the requirements of the local environmental management system and support the improvement in the Company's environmental performance.

15. CLIENTS

- 15.1. The Company is committed to providing safe, value for money, high quality, consistent, accessible and reliable services to its clients
- 15.2. All employees are expected to behave respectfully and honestly in all their dealings with clients and the general public in accordance with the principles set out in this Code.
- 15.3. In particular we safeguard and protect the welfare of vulnerable people who come into contact with employees. Employees and sub-contractors are made aware that they hold a position of trust and that they must at all times maintain the highest standards of personal conduct that reflects this trust being placed with them.

16. SHAREHOLDERS

- 16.1. The Company conducts its operations in accordance with the principles of good corporate governance.
- 16.2. We provide timely, regular and reliable information on the business to the Company’s shareholders.

17. SUPPLY CHAIN

- 17.1. We purchase a wide range of goods and services required in the operation of the Company and we also rely heavily on a number of key sub-contractors for the delivery of core services. Good working relationships with suppliers are therefore central to the success of the Company.
- 17.2. Whilst we are committed to obtaining and retaining competitive goods and services we seek to ensure they are from sources that have not jeopardised human rights, safety or the environment.
- 17.3. The Company expects suppliers to adhere to business principles consistent with the Company’s principles.
- 17.4. We seek to work with suppliers to develop long-term meaningful relationships to benefit both parties with the aim of improving the quality, environmental performance and sustainability of goods and services.

18. COMMUNITY INVOLVEMENT

- 18.1. The Company’s operations touch members of the community daily, whether as clients, neighbours, employees, businesses or residents. We are committed to fostering good relationships with the communities in which we work and building community partnerships that deliver positive change.

.....

Michael Williams
Chief Executive Officer

02nd April 2019