LEON GUARDING

ANTI-BRIBERY POLICY

Anti-Bribery Policy Policy POL53- JAN 2026, Issue 1

LEON GUARDING & FM LTD
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SIA APPROVED CONTRACTOR

ANTI-BRIBERY POLICY

Purpose

Leon Guarding & FM Limited is committed to the highest levels of ethical conduct and integrity in our business activities both in the UK and overseas. We adopt a zero tolerance approach towards bribery, fraud and corruption in any form. The aim of this policy is to outline Leon Guarding & FM's approach to preventing and prohibiting bribery, fraud and corruption in accordance with the Bribery Act 2010.

Scope

This policy applies to all employees and directors of Leon Guarding & FM Limited, and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, Leon Guarding & FM Limited ("associated persons") within the UK and overseas. Our senior management team is committed to implementing effective measures to prevent, monitor and eliminate bribery. However, it is also the responsibility of all employees and associated persons to assist Leon Guarding & FM Limited in the prevention, detection and reporting of bribery, corruption and / or fraud.

Principles

- Leon Guarding & FM Limited will not tolerate any form of bribery, fraud or corruption and is committed to the rigorous investigation of any such occurrence.
- Where acts of bribery, fraud or corruption are proven, Leon Guarding & FM Limited will ensure that it is dealt with appropriately and will also take relevant steps to recover any losses in full.
- Gifts and hospitality must only be received or offered in line with the rules set out in this policy and procedure.
- It is the responsibility of all employees, and associated persons, to report any reasonable suspicions of fraud or corruption and it is Leon Guarding & FM Limited policy that an employee should not suffer as a result of reporting reasonably held suspicions and there must be no unlawful discrimination on any grounds.

Employees are encouraged to raise concerns under the Leon Guarding & FM Limited Whistle Blowing Policy.

- The giving of aid, donations or voting designed to exert improper influence. Under the Bribery Act there are four possible offences relating to bribery:
- Bribing another person Leon Guarding & FM Limited prohibits the offering, promising or giving of a reward (whether cash or any other incentive) to induce a person or company to perform relevant function or activity improperly or as a reward for improper activity.
- This could be in order to gain any commercial, contractual or regulatory advantage for company in a way which is considered unethical.

Being Bribed

Leon Guarding & FM Limited prohibits the accepting of, agreeing to accept or requesting of a reward in return for performing a relevant function or acting improperly.
A relevant function includes any activity of a public nature or any activity connected to a business.
Leon Guarding & FM will consider the employee, or associated person, to have acted improperly where they are in breach of what a reasonable person within the UK would expect in relation to the performing of the function or activity, even if the function or activity is not taking place in the UK.

Bribing A Foreign Public Official

Leon Guarding & FM Limited prohibits any attempt to influence a foreign public official with the intention of obtaining or retaining business in a situation where the public official was not permitted or required by law to be influenced.

Failure To Prevent Bribery

Leon Guarding & FM Limited will endeavour to stop people who are operating on its behalf from being involved in bribery both within the UK and overseas. Bribery is a criminal offence and carries with it criminal penalties. This can be up to ten years imprisonment and an unlimited fine for any individual and an unlimited fine for Leon Guarding & FM Limited.

Fraud And Corruption

Fraud and corruption cover a wide range of irregularities and illegal acts, all of which are categorised by intentional deception. This includes theft, dishonesty, deceitful behaviour, bribery, forgery, extortion, conspiracy, embezzlement, misappropriation, false representation and concealment of material facts and collusion. Fraud can range from falsifying expenses and overtime claims, stealing money or items, using Leon Guarding & FM Limited, property and time for private use (without authorisation), to receiving bribes or inducements.

Where fraud is suspected or has occurred, we will carry out prompt and thorough investigations. Anyone found to be involved in fraudulent activity will have disciplinary action taken against them which may result in dismissal.

Facilitation Payments

Facilitation payments are sometimes used by businesses to secure or expedite the performance of a routine or necessary action to which the payer has a legal or other entitlement. In some countries it is customary best practice to make payments or gifts of small value to government officials in order to speed up or facilitate a routine action or process. However, facilitation payments may trigger an offence under the Bribery Act and it is very important that employees or associated persons act with great vigilance when dealing with such requests.

Where a public official has requested a payment, employees or associated persons should ask for further details of the purpose and nature of the payment in writing. If the public official

refuses to provide these this should be reported immediately to the Managing Director (MD) who will advise on the appropriate action to be taken.

If the public official provides written details then the MD will consider the nature of the payment and, where applicable, seek local legal advice before advising the employee, or associated persons, on the appropriate course of action.

Where the MD concludes the payment is for a legitimate fee, for example, as part of a genuine fast track process, or is permitted locally, Leon Guarding & FM Limited will confirm this to the employee, or associated persons, in writing and authorise them to make the payment. However, if the MD considers the request to be for a facilitation payment, the employee or associated persons will be instructed in writing not to make the payment. The public official should be notified that the matter will be reported to the UK embassy.

Corporate entertainment, gifts, hospitality and promotional expenditure a gift is considered to be any item, cash or goods or any service which is offered to an individual at no cost to them or at a cost which is less than its commercial value.

Hospitality is considered to be entertainment offered to an individual at no cost or a cost which is less than its commercial value. For example, drinks receptions, dinner invitations or corporate hospitality at an event.

Leon Guarding & FM Limited will permit corporate entertainment, gifts, hospitality and promotional expenditure that are undertaken for the following purposes:

- To establish or maintain a good business relationship
- To improve the image and reputation of Leon Guarding & FM Limited
- To present Leon Guarding & FM Limited's goods or services effectively.

This is on the provision that it is arranged in good faith and is not offered, promised or accepted to secure an advantage for Leon Guarding & FM Limited or any of its associated persons to influence the impartiality of the recipient.

Some of Leon Guarding & FM Limited clients have stipulated in their contracts that offers of gifts and hospitality of any value are not to be offered or accepted. Employees or associated persons are responsible for checking the client's contract prior to the offering of any gift or hospitality, even if it is considered to be taken in nature.

Leon Guarding & FM Limited will only authorise reasonable, appropriate and proportionate entertainment and promotional expenditure in line with the following guidance.

Accepting Gifts

Leon Guarding & FM Limited understands that in the course of day-to-day business some employees may be offered gifts of significant value. Employees, or associated persons, must not accept offers of gifts from individuals or companies with whom Leon Guarding & FM Limited currently, or might in the near future, conduct business with, except for gifts of a token nature or of relatively insignificant value (i.e. less than £50 such as diaries, calendars or promotional material). Employees, or associated persons, should never put themselves in a position where they could be accused of taking bribes or inducements for personal gain. Employees, or associated persons, should talk to their line manager if they are unclear as to what is acceptable.

If an employee or associated persons is offered a gift of over £50 then this should be raised with their line manager and a director. The offer will be logged in the gifts and hospitality register and the appropriate course of action will be expressly communicated to the individual.

Giving Or Offering Gifts

Leon Guarding & FM Limited recognises that as well as receiving gifts some employees, or associated persons, may be required to offer gifts to third parties, including customers and suppliers, in order to maintain good working relationships and to retain and obtain business.

With the exception of token gifts (i.e. less than £50) prior approval from a board director must be obtained before any employee, or associated persons, can offer a gift to a third party. Where a gift has a value of over £500 the person must obtain authorisation from the Managing Director (MD). It is the responsibility of the director to ensure all authorised gifts are recorded in Leon Guarding & FM Limited gift and hospitality register.

Accepting Hospitality

There may be some circumstances where hospitality is offered to events which will promote Leon Guarding & FM Limited interests and Leon Guarding & FM Limited recognises that external networking for some departments is a core part of their work. Personal invitations to non work-related, non- Leon Guarding & FM Limited events involving corporate hospitality, offered or given by any supplier, client, business contact or potential contractor, must be notified to the individual's line manager. If the hospitality has a commercial value of more than £500 authorisation must be sought from a director. The director is responsible for ensuring the offer of hospitality is logged in the gifts and hospitality register regardless of whether or not it is authorised.

Giving Or Offering Hospitality

Leon Guarding & FM Limited recognises that as well as accepting hospitality some employees, or associated persons, may be required to offer hospitality to third parties, including customers and suppliers, in order to maintain good working relationships and to retain and obtain business. With the exception of a working lunch or refreshments during a meeting with third parties, prior approval from a director must be sought before any employee, or associated persons, can offer hospitality to a third party. Where such hospitality is more than £1000 in one occurrence or £2000 in aggregate to any one party over a period of twelve months, the person must obtain authorisation from the Managing Director (MD). If the hospitality is authorised then it is the responsibility of the director requesting the authorisation to ensure it is recorded in Leon Guarding & FM Limited gift and hospitality register.

Political and charitable contributions Leon Guarding & FM Limited does not allow political contributions in any form whether to political parties, causes or to support candidates. The appointment of any politician or former politician as a consultant, employee or officer of Leon Guarding & FM Limited requires approval by the directors and is subject to applicable laws.

Leon Guarding & FM Limited will only make charitable donations that are legal and ethical under local laws and practices. No donation of over £500 must be offered without the prior approval of the Managing Director.

Declaration Of Interests / Conflict Of Interests

In order to protect employees and the reputation of Leon Guarding & FM Limited, employees should make their line manager aware if they have a conflict of interest and, if appropriate, ensure details are placed on the register of interests. A conflict of interest is where an employee has an interest in a decision that could be different from Leon Guarding & FM Limited, interest. This can range from being involved in decisions that affect fellow employees who are relatives, close friends or a partner, to the awarding of a contract from which the employee, close friend or relative may benefit financially. Those employees who are authorised to sign purchase orders, or place contracts for goods, materials or services must adhere to Leon Guarding & FM Limited rules on tendering and contracting.

Employees must not seek preferential rates or benefits in kind for private transactions carried out with companies that they have had official Leon Guarding & FM Limited dealings with. Any work carried out by such a company, if the value is more than £500, must be placed on the register of interests.

Records

Employees and associated persons (where applicable) are required to take particular care in ensuring that all company records are accurately maintained in relation to any contracts or business activities. This includes all financial invoices and all payment transactions with clients, suppliers and public officials.

Leon Guarding & FM Limited gift and hospitality register and register of interests will be maintained by designated individuals within each division. It is the responsibility of the line manager or director to ensure any gifts or hospitality, offered or received, as well as any conflicts of interest, are reported in line with this policy and procedure. Dealings with third parties Leon Guarding & FM Limited will endeavour to ensure that all third parties with whom we have dealings are aware of and have accepted this policy and procedure. Leon Guarding & FM Limited ED suppliers and sub-contractors are required to complete a supplier assessment form prior to the commencement of any initial work with Systematic Security Services. As part of this assessment they will be required to confirm their understanding of this policy and procedure and they will be asked if they have a similar policy in place. Any answers which are not considered suitable by the supply chain team will be raised to the Managing Director for approval prior to the supplier or sub-contractor commencing any work with Systematic Security Services.

Risk Management

Leon Guarding & FM Limited has established a risk management procedure to prevent, detect and prohibit bribery and fraud. Leon Guarding & FM Limited will conduct risk assessments for each of its key business activities on a regular basis. Where Leon Guarding & FM Limited identifies high risk areas (e.g. projects undertaken in high risk countries, tenders for work and high value projects) the anti-bribery, fraud and corruption risk assessment must be carried out

by the responsible person and sent to the appropriate board director for review prior to the start of the work or project.

Where the risk assessment shows a high risk of bribery, fraud or corruption the board director will be responsible for putting additional measures in place, these may include:

- Regular monitoring of 'at risk' employees and associated persons
- Regular communication with 'at risk' employees and associated persons.
- Additional anti-bribery, fraud and corruption training for 'at risk' employees and associated persons.
- Undertaking extensive due diligence of third parties and associated persons
- Communicating Leon Guarding & FM Limited's zero-tolerance approach to bribery to its third parties, including actual and prospective suppliers and joint venture partners.

Reporting Suspected Bribery, Fraud Or Corruption

Leon Guarding & FM Limited, relies on its employees and associated persons to maintain its high standards of ethical conduct and we request they assist Leon Guarding & FM Limited in remaining vigilant in order to prevent, detect and report bribery, fraud or corruption. Employees are encouraged to report any concerns that they may have to the appropriate person in line with the Whistle blowing Policy and Procedure.

Issues that should be reported include:

- Any suspected or actual attempts at bribery;
- Concerns that other employees or associated persons may be being bribery; or
- Concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.

The anti-bribery, fraud and corruption reporting form is available on the staff intranet or from the HR department to allow employees to record incidents of suspected bribery.

Employees or associated persons who report instances of bribery, fraud or corruption in good faith will be supported in line with the Whistle blowing Policy and Procedure and will not be subject to and detrimental treatment as a consequence of his / her report. Investigating suspected bribery, fraud or corruption Any reports of bribery, fraud or corruption reported under the whistle blowing policy and procedure will be thoroughly and promptly investigated by the appropriate manager/HR business partner and will be handled in the strictest confidence.

Employees, or associated persons, will be required to assist in any investigation into the suspected bribery, fraud or corruption. Breaches of the anti-bribery, fraud and corruption policy

Any breach of the anti-bribery, fraud and corruption policy may be considered gross misconduct and will be treated very seriously by Leon Guarding & FM Limited. Disciplinary action may be taken in line with the Group Disciplinary Policy and Procedure and this may include summary

dismissal from Leon Guarding & FM Limited. Leon Guarding & FM Limited may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police. Leon Guarding & FM Limited will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

If you have any questions on any of the information within this policy or would like further details, please do not hesitate to discuss them with your line manager or HR representative.

The Managing Director shall review this policy annually or following significant changes.

Signed: Shahzad Sadique ***Date: 31- Jan - 2026***