



## Protection of the Public Policy

Westmid Services Group Ltd. recognises its responsibility to the wider community and the role it has to play in protecting the public.

All of our officers are required to report suspicious activity and behaviour to the police.

There is also an expectation that if in the course of their day-to-day today duties our officers see evidence of criminal activity or anti-social behaviour they will either report it directly to the local police or do so via their control centre. In the event of identify such incidents the officers are instructed not to put themselves at risk of harm or injury. The officers are instructed to identify vulnerable people that may require protection to ensure their safety.

Members of the management team will encourage all employees to get ACT (Action Counters Terrorism) awareness e-Learning course online. The purpose of this training is to raise staff awareness of the current terrorism considerations. ACT e-learning training includes; Identifying and reporting suspicious activity; Dealing with a bomb threat and guidance on responding to a firearms or weapon attack.

Our Security Guards are trained to identify vulnerable people and know what steps to take in order to protect them. The aim is to enable Security staff to support police in taking an active role in ensuring the safety of the public.

Signed \_\_\_\_\_ H Salim \_\_\_\_\_ Position \_\_\_\_\_ MD \_\_\_\_\_ Date 01 / 07 / 23 \_\_\_\_\_



# Child Protection Policy and Policy Statement

## 1.1 Introduction

Children, young people, and those who are particularly vulnerable are entitled to enjoy a safe environment at social and educational organised events. Our company recognises its legal and moral duty to ensure that we provide these people with the best possible care when we are the security provider at such events.

We are dedicated to adopting and carrying out policies that ensure all security personnel understand their strict obligation to protect children from abuse or other harm. Our personnel are required to follow strict procedures created to protect children and to report any abuse or similar problems to the relevant authorities.

At both indoor and outdoor functions and events, we always strive to protect children, young people and those who are particularly vulnerable against abuse or harm. We endeavour to educate and train both employees and volunteers security personnel to carry out this policy mission and be prepared to address specific child protection issues.

All of our employees who perform security tasks are fully licensed and trained by the Security Industry Authority, government initiated regulatory body for the security industry.

The Children's Act of 1989 defines a child/young person as anyone under the age of 18. (Children's Act 1989).

## 1.2 Policy Statement

We believe that:

- Nothing is more important than the welfare of a child.
- Every child, regardless of gender, age, culture, ability, language, racial origin, sexual identity or religious belief and/or sexual identity is entitled to a safe and fun environment in which to pursue their religious, pleasure oriented or educational interests.
- It is our duty to protect children from degrading treatment, discrimination and other forms of harm through all possible measures. We endeavor to respect children's' feelings, wishes, and rights.
- We will take seriously and investigate thoroughly all allegations or suspicions of abuse of or poor practices aimed at children, and will promptly involve the authorities in any such incident.
- All our employees may, from time to time, interact with children while providing security services. Therefore, they are all screened and CRB checked as required by Security Industry Authority regulations. We provide all such employees with training and additional guidance concerning child protection measures to be taken. The CRB check and any screenings of employees are carried out by independent personnel not directed by the company.
- To be effective in protecting children, we must work in cooperation with event organisers, stakeholders, parents and children.

## 1.3 Monitoring and reviewing the policy and procedures

Child protection measures and procedures must be periodically reviewed and monitored. A regular report must be given to management concerning this by the Managing Director. The implementation of procedures should be regularly monitored and reviewed. The Managing Director should regularly report progress, challenges, difficulties, achievement gaps and areas where changes are required to Westmid Services Group Ltd..

This policy must be subject to overall review at least every three years or whenever the law or this organisation undergoes a major change.

Signed H Salim Position Director Date 01 / 07 / 2023

This policy will be held by the Director on behalf of the WSG Ltd board and will be reviewed annually to ensure that it remains relevant, both internally with all employees and externally regarding changing social and moral attitudes and business best practice.

**Signed:** H. Salim

**Position:** Director

**Date:** 01/07/2023



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Signed \_\_\_H Salim\_\_\_\_\_ Position \_\_\_\_\_ Director \_\_\_ Date\_01\_\_\_/\_\_\_07\_\_\_/\_\_\_2023\_\_\_\_\_



## Complaints Policy

We acknowledge that, no matter how hard we try to do our best, mistakes sometimes occur, and we may occasionally not give our Stakeholders, Employees or Clients the high quality of service that they properly expect from us.

We welcome, in those situations, a report that this has happened in the form of a Complaint.

When this occurs, which should be rarely, we will make every effort possible to quickly and efficiently remedy the problem, acknowledging directly our responsibility to correct errors, and doing so without compromising the rights and expectations of our Stakeholders, Employees, or Clients.

We incorporate everything we learn from addressing a Complaint to make our future quality of service better and to avoid similar problems from happening in the future.

We pledge to address Complaints:

**Swiftly:** A formal acknowledgement within 24 hours, If the complaint has not been resolved to send an interim response at the 3 day point, A full and final response at the 7 day point, A follow up 10 – 14 days after the final response to ensure the complainant is still happy with the resolution.

**Efficiently:** The Director of the business will personally take charge of the investigation of the complaint and directly communicate with the complainant to attempt to resolve the problem without delay.

**Transparently:** Documentation will be kept of the full results of the investigation and provided to the complaining party.

**Honestly:** If we have made an error or mistake, we will frankly acknowledge it. If our service was deficient in any way that was within our reasonable control, we will do our utmost to ensure that the complaining party does not suffer the consequences.

If you have a Complaint please communicate with the Westmid Services Group Ltd. Team via Email, postal letter, fax, or telephone. Complaints can be addressed to any of our staff members.

Signed H Salim Position Director Date 01/07/2023



## Corporate Social Responsibility Policy

This policy sets out our view of our corporate responsibilities for the environment and communities in which we operate and for the well-being of our staff, partners, public and clients. Some of these responsibilities are spelled out in more detail in other documents.

Every person we work with or for makes important and unique contributions to the community, to their own organizations, and to our work. We appreciate and honour their diversity in every way it manifests itself and encourage diversity as basic in all our interactions with the community and with our partners, associates, employees and clients.

We acknowledge our responsibility to care for our employees, to provide them with meaningful employment through which they can support themselves and their families, and to do everything possible to ensure their ongoing workplace welfare, health, and safety.

We are committed to ensuring our clients and the general public have a secure and safe environment, and we will attempt to safeguard their property, including intellectual property, just as much as we would protect our own.

Through the operation of our Environmental Policy, our Policy on Equality and Diversity and our Health and Safety Policy, we seek to improve and maintain the environment within the communities in which we operate. We oppose both child labour and forced labour and do not engage in either practice. Westmid Services Group Ltd. pride ourselves in dealing with our employees, business partners, and clients in an honourable and honest way always.

Signed H Salim Position Director Date 01 / 07 / 2023



# Drugs and Alcohol Policy

## 1.0 General

Many workplace accidents, injuries and significant lost productivity are caused by alcohol or drug abuse on an annual basis. Our company policy is to have a work force that does not engage in the illegal use of drugs or in the abuse of alcohol. We regard any alcohol or drug abuse by employees as very serious and something that this company cannot tolerate or condone.

We actively discourage any alcohol or drug abuse outside the workplace. Use of illegal drugs or alcohol at the work place or any company premises is absolutely forbidden.

## 2.0 Possession, Use or Sale

Possession, use or sale of drugs or alcohol on company property, at any work site, or while on the job is grounds for serious disciplinary action which may include termination. Legal consequences may also occur.

All employees must be in good physical and mental condition for work when their shift starts and must be there on time, which drug or alcohol abuse may interfere with. Our company endeavours to provide a working environment that is safe, healthy, and drug-free.

## 3.0 Drug Testing

When there is reasonable suspicion that an employee has engaged in prohibited use of drugs or alcohol, the company reserves the right to make them undergo an alcohol or drug test. Reasonable suspicion is defined as including, but is not limited to:

- Any evidence of alcohol or drug use of a physical or testimonial nature
- The occurrence of an accident involving the employee, or an
- Apparent impairment of work performance.

Refusal to submit to a requested alcohol or drug test can result in discipline actions, with sanctions ranging to and including termination.



#### 4.0 Prescription Medication

Prescription medication or over-the-counter medication that can negatively impact on an employee's work performance should be avoided if at all possible. If use of such medication renders an employee unable to properly or safely perform their job duties, their employment may be suspended or terminated.

Employees who are taking prescription medication or over-the-counter medication that can negatively impact their job performance must inform their supervisor of this prior to reporting to work.

#### 5.0 Reporting Criminal Convictions

Employees convicted of any criminal drug offense, regardless of where it took place must report such conviction to the company in writing within three days. A similar report must be made in writing within three days of any pending court appearance or police caution for a drug related incident.

#### 6.0 Drug or Alcohol Rehabilitation Programs

Our company endeavours to assist employees who want to undergo rehabilitation or treatment for dependency on alcohol or drugs. Employees will not be terminated for trying to seek help for such problems and treatment of rehabilitation program enrolment will not be noted in an employee's personnel file.

Employees enrolled in such programs must consent to being subjected to random drug testing and will be terminated if they fail such tests.

**Westmid Services Group Ltd. employees with a drug or alcohol problem are encouraged to ask the company for help.**

Signed H Salim Position Director Date 01 / 07 / 2023



## Environmental Policy

Westmid Services Group Ltd. wishes to ensure that their employees that we minimize any negative impact our operations could potentially have on the environment.

Accordingly, our policy is to:

- Always strive to better our performance regarding environmental issues and use the best environmental management practices as part of our business operations.
- Try to minimize our use of resources and to attempt to efficiently use those resources that we must consume.
- Attempt to reduce our carbon footprint to comply with our targeted objectives.
- Responsibly apply the principles of waste reduction, waste reuse and waste recycling as per our waste management practices.
- Try to prevent pollution at our premises and work sites.
- Take environmental issues and energy performance into account in facility purchases, design, refurbishment and management.
- Take environmental issues, including climate change, into account when buying services and goods.
- Obey all applicable environmental laws and regulations.

The company monitors progress on these goals, seeks feedback from employees and customers on these issues, and informs employees about the importance of environmental issues. We work with our employees, service partners, landlords and their agents and customers to improve our performance on environmental issues. We take sustainability and other environmental issues into account when providing security services.

Signed   H Salim   Position            Director    Date 01  /07  /2023



## Equal Opportunities Policy

Westmid Services Group Ltd. members and staff oppose racism and sexism in all the forms in which it is manifested. We pledge to implement policies that treat all persons in all the functions of our business equally on the basis of race, sex, class, color, ethnic origin, nationality, sexuality, marital status, age, trade union activity or membership, physical or mental disability, or religious belief. We endeavor to promote these values within the places in which we operate and with individuals, organizations or entities that we come into contact with.

Westmid Services Group Ltd. is dedicated to taking action to carry out this policy.

### Equal opportunities policy statement

Westmid Services Group Ltd. states that it is an equal opportunities employer. Accordingly:

In providing Security Services and employing persons to provide these services, Westmid Services Group Ltd. endeavors to make any employment decisions on the basis of equality of opportunity and fair treatment for all persons.

No person or group seeking services, a job, or contracts with us will be treated with discrimination on the basis of sex, sexuality, age, race, class, color, nationality, ethnic origin, marital status, trade union membership or activity, physical or mental disability, or religious belief.

Westmid Services Group Ltd., in the course of implementing this policy, will strive to aid disadvantaged person groups to benefit from its provided services, and attempt to identify the needs of such persons and groups.

We will compile and review records of the ethnic/racial origin and sex of everyone applying for services or jobs from us to aid in implementing this equal opportunity policy.

For and on behalf of Westmid Services Group Ltd..

Signed H Salim Position Director Date 01 / 07 / 2023



## Health and Safety statement of intent

1. Our company strives to take strict measures to monitor and control Health & Safety as an integral part of running our business operation.
2. We will, if is possible:
  - a. Make sure that all working practices and work equipment are safe and that they do not pose a risk or hazard to Safety and Health.
  - b. Make sure that needed measures are carried out to safely use, store, and transport all substances and materials.
  - c. Give all needed training, supervision, instruction and information to make sure that all employees have a working environment that does not endanger their Health or Safety.
  - d. Control all workplaces, equipment and utilized transport in a condition that is safe and free from Health and Safety risks
  - e. Make sure that employees have access to adequate facilities to safeguard their welfare
  - f. Take measures to protect the Health and Safety of visitors, contractors and any members of the public who could be impacted by our operations
  - g. Give employees all needed information concerning procedures to protect their Health and Safety and the Health and Safety of others, and, when needed, consult with them to improve how our company handles these issues.
  - h. Make sure that all employees carry out their Health and Safety responsibilities and work with management to carry out this policy
  - i. Monitor how this policy is carried out in the workplace.
  - j. Make Sure sufficient funds are available to implement this statement.

Westmid Services Group Ltd. will also regularly review this policy to see if any changes are needed.

Signed H Salim Position Director Date 01/07/2023



## Health & Safety Policy

This is the statement of general policy and arrangements for Westmid Services Group Ltd. Haroon Salim – Manager has overall and final responsibility for health and safety. Haroon Salim– Manager has day-to-day responsibility for ensuring this policy is put into practice.

Statement of General Policy	Action/Arrangements (What are you going to do?)
Prevent accidents and cases of work-related ill health by managing the health and safety risks in the workplace	Relevant risk assessments completed and actions arising out of those assessments implemented. (Risk assessments reviewed when working habits or conditions change.)
Provide clear instructions and information, and adequate training, to ensure employees are competent to do their work	Staff and subcontractors given necessary health and safety induction and provided with appropriate training (including working at height, asbestos awareness and electrical safety) and personal protective equipment. We will ensure that suitable arrangements are in place to cover employees engaged in work remote from the main company site.
Engage and consult with employees on day-to-day health and safety conditions	Staff routinely consulted on health and safety matters as they arise but also formally consulted at regular health and safety performance review meetings or sooner if required.
Implement emergency procedures – evacuation in case of fire or other significant incident. You can find help with your fire risk assessment at: <a href="https://www.gov.uk/workplace-fire-safety-your-responsibilities">https://www.gov.uk/workplace-fire-safety-your-responsibilities</a>	Escape routes well signed and kept clear at all times. Evacuation plans are tested from time to time and updated as necessary.
Maintain safe and healthy working conditions, provide and maintain plant, equipment and machinery, and ensure safe storage/use of substances	Toilets, washing facilities and drinking water provided. System in place for routine inspections and testing of equipment and machinery and for ensuring that action is promptly taken to address any defects.

Responsibility of: \_\_\_\_\_ Haroon Salim \_\_\_\_\_

Signed H Salim \_\_\_\_\_ Position \_\_\_\_\_ Director \_\_\_\_\_ Date 01 / 07 / 2023 \_\_\_\_\_



## Lone working policy

Westmid Services Group Ltd. is committed to ensuring that all of its employees have a safe working environment. We support and encourage each of our employees to attempt to improve and maintain workplace Health and Safety.

A risk assessment of the work site will be carried out and completed before a security officer is assigned to work alone during the daytime (at an empty site) or overnight (at any site). The emphasis in such an assessment is to take all measures to protect our personnel. All site risk assessments shall be reviewed whenever site conditions are known to have changed, and, in any event, at least on an annual basis.

A security officer assigned to work alone shall be supplied with a mobile phone by the company and is required to use it every hour to make a check call to Westmid Services Group Ltd. 24 hour Communication Centre. If a call is not received, a Customer Service Manager or a Supervisor will be sent to the work site to investigate whether the security officer is experiencing difficulties, and, if so, to assist the officer. If these persons are not available or have been sent to the site and have not called back to the control Centre, local law enforcement shall be notified and asked to investigate.

A complete list of instructions for the assignment shall be kept at the work site. Those instructions will include a description of any Safety or Health issues present and pinpoint high risk areas at the site. They will also spell out the Client's and Company's customary procedures to be followed.

Emergency phone numbers for the client's personnel (who hold keys for the site) shall be given to security officers, and also numbers for local emergency services and responders. Security officers must be fully familiar with the assignment instructions and be able to comply with them during their on-duty hours. Such instructions shall be reviewed and, if needed, amended when the Client requires, when site conditions change or, at a minimum, on an annual basis.

Signed H Salim Position Director Date 01/07/2023



# Media Handling Policy

## Overview

Westmid Services Group Ltd. has an excellent reputation. We are well known as providing top notch professional security services, and have strong ties with our customers, whose respect we have earned over time.

From time to time, we may receive information inquiries about our company from members of the news media. News reports about our services can assist members of the public, including our customers, potential customer, and business partners to appreciate what we do and how we serve our communities. We try to be open to media inquiries and to supply them with truthful information.

## Purpose

This policy aims at ensuring that we always strive to provide relevant, truthful, timely, and complete information in response to media inquiries.

## Scope

This policy is intended to apply to all personnel employed by the company.

## Designation of Company Spokesperson

The Company Director is the person responsible for communicating with the media on behalf of the company.

Should any member of staff be involved in any incident or event that attracts media attention they are reminded that all communications with the media are to be authorised by the director or their appointed spokesperson. Employees are reminded that they are not authorised to make any statements on behalf of the company or client to the media nor are they permitted to answer any questions about the company or clients; any comments made by the employee are of their own expression and not those of the company or clients, and the employee must ensure that this is clearly understood by the media.

The company have elected the company Director to be the authorised spokesperson for the business and any requests for comment should be directed to the Director. Where appropriate, the Director will in association with the client prepare a joint statement, which may be communicated in a press release or through the company solicitors.



## **Media Communication Guidelines**

If a representative of the media contacts an employee of the company, they may be seeking:

- Particular information about the company and the services that it provides.
- Information about sudden events, including legal and regulatory actions, accidents, thefts, arrests, employee or customer complaints or natural disasters.
- Comment or reaction to new developments in the security industry or concerning our services;
- Background information for more general news stories involving the communities our company serves.

Any calls from media representatives should be forwarded to corporate communications. Employees should not say that they are not permitted to speak with reporters or that they must get permission to do that. Instead, reporters should be told that the company policy is to send all media questions to the company Director.

The media representatives should be extended the same professionalism and politeness that we show to customers and other members of the public. Their inquiries should be answered with a referral to the Director quickly. This is an important part of promoting our company and its image.

Employees contacted by the media should immediately inform the Director who may ask for your assistance in preparing a response. Do not permit a media representative to pressure you to immediately respond to questions, since a considered response is always preferable and more likely to convey relevant and correct information.

## **Photograph and Film Guidelines**

When a media representative asks to be allowed to take photos or film inside our premises or at a worksite, their request should be forwarded to the company Director. Without the Director's approval, no such permission can be granted. The Director will not give approval except after consulting with the manager of the site.



Factors to be considered in deciding whether to grant such permission includes whether it will disrupt work operations, the company has anything to gain from granting the request, the current condition and age of the facility, and whether the facility is currently clean and suitable to be pictured or filmed.

Media including camera crews may show up at our premises or a worksite, especially in a crisis situation or if some external organization or group has planned a boycott or demonstration at our premises or a worksite.

Such unannounced visits by media representatives and their camera crew should be treated professionally and politely. The Director should be notified immediately. The Director may want to contact the media representative's editor or other supervisor. They cannot be allowed to enter without permission.

Our company has no control over the taking of photos or filming outside our premises or worksites on public property, such as courtyards, walkways or public parking lots, so no employee should interfere with such activities there.

Members of the media should not be permitted to block the entrance and exit passages to our facilities or worksites or interfere with the normal conducting of business by our company and its customers.

Media representatives may be notified if our customers complain about any disruption they have caused as to access to walkways or parking lots. Employees should remain aware that anything that they say to the media may be reported in print or broadcast.

### **Seeking Media Coverage**

When an employee has an idea about good news story to provide to the media, they should seek permission to do so from the Director, who is the only one authorized to approve seeking media coverage. Do not contact the media without getting approval. Some types of news may be appropriate only for internal company promotion, such as in an employee newsletter.

Signed H Salim Position Director Date 01/07/2023



## Quality Policy

The quality policy describes the fundamental principles against which we, Westmid Services Group Ltd., operate and which will support the achievement of our objectives, vision and values. We recognise that success in reaching our objectives depends on our ability to create real and perceived value for customers in everything we provide. We also acknowledge that we depend on the people we work with as well as our clients to achieve this.

Westmid Services Group Ltd. aims to be recognised as a best in class provider of security services through our management team supporting our people in the delivery of customer service excellence; together with efficient and effective operational processes and an ongoing programme of training and development.

Our success will be measured through the achievement of our quality objectives. And this can best be achieved through the recruitment of highly motivated, customer focused officers, supported by our managers at all levels of the business, and by the recognition that our people are the public face of the business and significantly impact on the customer's perception of how we operate and the service we deliver. We must therefore ensure that we create an environment that makes Westmid Services Group Ltd. a good place to work for all of our employees.

We are committed to comply with all regulatory requirements of security business and we aim to continually improve our security services and measure those at regular intervals.

This policy is a controlled document and shall be reviewed and amended, where applicable, to ensure that it remains relevant to the Company's business.

Signed H Salim Position Director Date 01/07/2023



## Recruitment and Selection Policy

We aim to provide equal opportunities in employment, and our recruitment and selection procedures reflect that. We correctly train our HR staff or other such members of staff who have recruitment and selection responsibilities, to ensure that they avoid unlawful discrimination, both of the conscious and the unconscious varieties.

Our policy is to hire, promote, and advance employees solely on the basis of merit. All decisions related to hiring, recruitment, promotion or advancement will be made on this basis.

From time to time, all job descriptions, if utilized, shall be reviewed and revised to make sure that they comply with our policy of equal opportunity.

When we place advertisements for job vacancies, we will take these issues into account, and they will be non-discriminatory in nature.

We are committed to providing fair treatment to each and every job applicant, and consider them only on the basis of their ability to carry out the essential functions of the job. All job interview questions must be of a nondiscriminatory nature, and only concern job requirements.

Signed H Salim Position Director Date 01/07/2023



## Sexual Harassment Policy

Westmid Services Group Ltd. regards sexual harassment as a type of unacceptable misconduct that interferes with a proper employment relationship. Employees have a right to expect that their workplace and working environment will be free of any and all discrimination or conduct that is harassing, disruptive or coercive. Sexual harassment is strictly prohibited and will result in discipline, with the sanctions ranging up to and including termination.

### 1. Sexual Harassment Definition

Sexual harassment includes non-consensual verbal, physical, or visual sexually oriented conduct or materials, requests for sexual favors, or sexual advances. This includes anything that is objectionable or offensive to the person exposed to it, and includes, but is not limited to, sexual epithets, suggestive or derogatory slurs, gestures or comments, and offensive drawings, pictures, cartoons or posters.

Our policy is based on the legislative definition of sexual harassment. It includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature that occur under the following conditions

- When conduct of this nature constitutes either an explicit or implicit condition or term of employment (such as when it impacts promotion, training, timekeeping or overtime assignments)
- When submission to or rejection of the conduct is utilised as a factor in making employment decisions (such as for hiring, promotion, or termination)
- When the conduct interferes with an individual's work performance or results in a hostile, intimidating, or offensive work environment

Sexual harassment may also involve employee conduct that interferes unreasonably with another employee's work performance through the creation of a hostile, intimidating, or offensive workplace environment. Sexual harassment includes any behavior by employees aimed at other employees including, but not limited to, explicit or subtle pressure for sexual activity, touching or language of an inappropriate nature, asking for or demanding sexual favors, or physical assault.

### 2. What is excluded from the definition of sexual harassment?

Sexual harassment does not include socially acceptable occasional remarks or compliments or common friendly terms of greeting. It only encompasses unwelcome behavior, and that which interferes with work effectiveness by decreasing morale or being personally offensive.



### **3. Non-Employee Harassment**

Our company tries to protect all of its employees from harassment by customers, vendors and other non-employees that they come into contact with.

### **4. Procedure for Complaints**

Employees who believe that they have been subject to sexual harassment should report it right away to the company Director or any other supervisory personnel. Employees are encouraged to make such reports in writing, to create a record, but verbal complaints are also accepted and welcome. Any such complaints are taken seriously and are promptly and fully investigated. The confidentiality of the person involved and witnesses shall be protected from unneeded disclosure as long as it is possible to do so. The individuals have a right to be informed of the results of the investigation.

Under usual circumstances, the individual will be contacted by the company within five days of their complaint and informed as to what steps are being taken in response. When a direct supervisor or other superior is the perpetrator of the sexual harassment, their conduct should be reported to their supervisor or the company Director.

### **5. Discipline**

If an employee, including a supervisor, is determined to have harassed an applicant for employment or current employee, disciplinary sanctions will be imposed which may include reprimands, suspension, or termination.

Legal responsibility may also be imposed.

### **6. Managerial Responsibility**

Managers and supervisors are charged with the responsibility of carrying out this policy with their area supervised. Sexual harassment is a violation of this policy and is also unlawful. The company acknowledges its responsibility to prevent, stop, and remedy workplace sexual harassment, to promptly investigate any complaints, and to immediately take corrective action to remedy the problem.

### **7. Retaliation Prohibited**

The company is opposed to and will not tolerate any retaliation against an employee who themselves complains about sexual harassment or who serves as a witness in an investigation of a sexual harassment complaint.

### **8. Amendment of Written Policy**

This policy may be amended in writing from time to time, with any new version appearing in the employee handbook. We encourage employees to review this document now and whenever it is amended.

Signed H Salim Position Director Date 01/07/2023



# Smoking Policy

## ***Purpose***

This policy is intended to protect all Westmid Services Group Ltd. employees, service users, customers and visitors from second-hand tobacco smoke exposure and to comply with the Smoke-free Premises Regulations 2007.

Exposure to second-hand smoke, also known as passive smoking, increases the risk of lung cancer, heart disease and other illnesses. Ventilation or separating smokers and non-smokers within the same air space does not completely stop potentially dangerous exposure.

## ***Policy***

Smoking is prohibited throughout the entire workplace with no exceptions. This includes company vehicles. This policy applies to all employees, consultants, sub-contractors, customers.

## ***Implementation***

Overall responsibility for policy implementation and review rests with company director. All staff are obligated to adhere to, and facilitate the implementation of the policy.

The company director shall inform all existing employees, consultants and contractors of the policy and their role in the implementation and monitoring of the policy. They'll also have to give all new personnel a copy of the policy on recruitment / induction.

Appropriate 'No smoking' signs will be clearly displayed at the entrances to and within the premises.

## ***Non-compliance***

Local disciplinary procedures should be followed if a member of staff does not comply with this policy. The procedures set out on page 12 of the booklet 'Helping to get your business or organization ready for the new law on smoking' should be followed if a customer, visitor or passenger does not comply. Those who do not comply with the smoking law are also liable to a fixed penalty fine and possible criminal prosecution.



### ***Help to Stop Smoking***

Support for smokers who want to stop will be provided. Sources of support are: Smoke line 0800848484, the Public Health Department of your local NHS Board, or your local GP surgery. Contact details can be found in your local directory.

### ***Vehicles***

All work vehicles must be kept e smoke-free always except if only the same person ever uses them and never carries passengers.

### ***Employer Duties***

- We display No Smoking Signs as legally required.
- We make sure that to ensure employees, customers and visitors do not smoke in our workplaces or vehicles.
- We look into and promptly investigate complaints about employees, customers or visitors smoking.
- We train, inform and consult employees concerning this policy.

### ***Enforcement of this Policy***

Failure to comply with this policy will be dealt with through the company's disciplinary procedures. Visitors or members of the public who breach the policy will be asked to stop smoking and will be asked to leave the premises if they fail to comply with this request. All breaches of this policy will be recorded in writing by the organisation. Be aware that, in addition to action taken under this policy, the local council may take legal action against individuals who smoke in Smoke-free places or vehicles.

Signed H Salim Position Director Date 01/07/2023



## Training and development policy

Westmid Services Group Ltd. promises to provide a training and development program for its staff that is structured and includes both vocational and occasional refresher training. The goal is to ensure success while enabling a high standard of service. This is also provided to comply with the **Private Security Industry Act of 2001**, the applicable legislation.

### We will:

- Provide induction training for new staff and those transferring to new areas of our business
- Provide the required training for those seeking promotion so that they are appropriately prepared for achieving their new responsibilities
- Provide adequate training on health and safety for all employees
- Ensure that employees are aware of the availability of all training courses
- Develop a training plan for everyone, appropriate to each individual
- Review individual training plans during annual appraisals

We train staff members to be able to handle all tasks relevant to their specific assignments and to maintain or acquire the necessary specialist skills. Training is provided at continuation, refresher and contingency levels.

This policy has been reviewed and approved by the Directors of the firm and has the support of all management levels in Westmid Services Group Ltd..

Signed \_\_H Salim\_\_\_\_\_ Position \_\_\_\_\_Director \_\_\_\_\_ Date\_01\_\_/\_07\_\_/\_2023\_\_\_\_\_



## Policy on Transfer of undertaking (protection of employment) Regulations "TUPE"

The transfer of the ownership of a business, trade or other undertaking from one particular provider to a second subsequent provider is governed by The Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE).

These regulations outline that such a transfer does not end the employment contract of an employee of the transferor. Once the transfer is completed, all duties, liabilities, powers and rights of the transferor, under the employment contract, are deemed transferred to Westmid Services Group Ltd..

All terms and conditions of the existing employment contract remain in effect except for provisions relating to pensions. We will check all TUPE transferees' personal files compliance with BS7858:2019 to complete any gaps in screening and vetting. We will provide induction training; assess any training needs to All TUPE transferees. Company will also provide training to all TUPE Transferees within 12 weeks.

Should any changes take place in the regulation, this policy will be revised after reviewing it on an annual basis.

Signed H Salim Position Director Date 01 / 07 / 2023



## Violence at Work

Westmid Services Group Ltd. employees who come into contact with the public may encounter violent or aggressive behavior. At times, members of the public may attack, threaten, or curse them.

The Health and Safety Executives define violence as "Any incidence, in which an employee is abused, threatened or assaulted by a member of the public in circumstances arising out of the course of his or her employment".

The most common type of incident our employees typically encounter involves verbal abuse and threats. Physical attacks occur less frequently. In addition to the use of unlawful physical force against a person, violence may also involve the uttering of verbal abuse and threats (whether with or without a weapon), rude innuendoes or gestures, and racial/ sexual harassment.

Violence of any kind can cause significant emotional stress even when there is not a physical injury. A risk of physical injury may be implied by threats. Those who damage an employee's personal property and belongings can also instill fear of future physical attack and thereby cause emotional distress and stress.

### Statement

As an employer, we will spare no reasonable effort and precautions needed to protect our employees' safety and health at work and to help prevent aggression and violence of all kinds.

Employees, who are assaulted, threatened, or who have suffered verbal abuse while working will receive all possible support and assistance by the company, including efforts to protect them while working on our clients' premises.

### Reporting of Incidents

We make an: "Incident Report form" which will be available from Reception, which employees and managers should use to report any incidence of violence, aggression, threats or verbal abuse at work whenever and wherever it occurs. Reporting such incidents is legally required under the Reporting of Injuries, Diseases, and Dangerous Occurrences Regulation's 2013 (RIDDOR).



## What are Reportable Injuries?

The following injuries are reportable under RIDDOR when they result from a work-related accident:

- **The death of any person**
- **Specified Injuries** to workers
- Injuries to workers which result in their **incapacitation for more than 7 days**
- Injuries to non-workers which result in them **being taken directly to hospital for treatment**, or specified injuries to non-workers which occur on hospital premises.

Certain accidents are reportable to the HSE's Incident Contact Centre. The Health and Safety Coordinator must be notified as soon as practicable after incidents causing the following injuries:

- Fractures, other than to fingers, thumbs and toes
- Amputations
- Any injury likely to lead to permanent loss of sight or reduction in sight
- Any crush injury to the head or torso causing damage to the brain or internal organs
- Serious burns (including scalding) which:
  - covers more than 10% of the body
  - causes significant damage to the eyes, respiratory system or other vital organs
- Any scalping requiring hospital treatment
- Any loss of consciousness caused by head injury or asphyxia
- Any other injury arising from working in an enclosed space which:
  - leads to hypothermia or heat-induced illness
  - requires resuscitation or admittance to hospital for more than 24 hours

## Incident Report Form

This form should be completed as soon as possible after the event, preferably by the member of staff involved. The report form covers the following:

- Details of person assaulted
- Details of assailant/s if known
- Details of incident (including any injury suffered, treatment received)
- Outcome (whether the Police were called)
- Possible contributory factors/improvements



### **Signs of aggressive**

- Staring eyes
- Sweating
- Fidgeting/wringing of the hands
- Loud excited speech
- Finger wagging

### **Actions to defuse the situation:**

- Staying calm and speaking slowly so as not to be drawn into heated argument
- Avoiding aggressive body language such as hands on hips, wagging fingers, looking down at the aggressor
- Use gentle, measured calm speech
- Listen attentively to what the person has to say and show compassion
- Do not argue and try not to respond until the person has got their frustration out of their system.
- Make eye contact but try not to stare
- Maintain an open posture – avoid crossed arms, finger wagging or hands on hips
- Give the person plenty of personal space

### **Should you be threatened or physically assaulted?**

- Try to escape
- Raise the alarm – by shouting if necessary
- Call the police – either yourself, or by getting someone to do it for you
- Report the matter to your manager as soon as possible

Make a note of what happened, including,

- Time and date
- Location of the incident
- Names and addresses of any witnesses
- What you were doing at the time of the incident
- What the outcome was – i.e. injury, verbal abuse, damage to property etc.

Signed H Salim Position Director Date 01 / 07 / 2023



## Waste and Recycling Policy

Westmid Services Group Ltd. believes in promoting sustainability through prudent waste management and recycling. We attempt to lower our use of materials, reuse materials when we can, and attempt to recycle materials and utilise recycled materials whenever possible. We keep these principles in mind in managing office products, including paper and electronic equipment including computers, plastic, glass, cans, and batteries.

To carry out these goals, we educate and inform our staff about policies and issues, and make recycling receptacles available on our premises. We use suppliers, whenever possible, who will aid in collecting and recycling used products that they have supplied, and always seek waste reduction, waste recycling and waste minimization information from suppliers and vendors that we use.

Signed H Salim Position Director Date 01 / 07 / 2023



# Accident/Incident Investigation Policy

## Policy Statement

All employees of Westmid Services Group Ltd. must report any accidents or other incidents that result in an injury or property damage to their immediate supervisor. Such reports must be made as soon as possible. Any incidents that had the potential to cause property damage or serious injury but did not should also be reported. Management must receive a report of all accidents or incidents from supervisors as soon as possible. Each report will undergo analysis to determine the cause of the accident or incident and to see if any steps should be taken to prevent further injury or damage from occurring in the future.

## Definitions

An **incident** is an unplanned, undesired event that adversely affects completion of a task or, An **occurrence**, condition, or situation arising in the course of work that resulted in or could have resulted in injuries, illnesses, damage to health, or fatalities.

- A **Critical Injury** is any serious injury that:
  - a) Exposes a life to jeopardy;
  - b) Results in unconsciousness;
  - c) Causes substantial blood loss;
  - d) Causes the fracture of an arm or leg but not a toe or finger;
  - e) Causes the amputation of an arm, leg, foot or hand but not a toe or finger;
  - f) Results in burns to a major portion of the body; or
  - g) Results the loss of eyesight to at least one eye.
- **First Aid** involves injuries that are more minor that can be treated on the jobsite without any employee losing days.
- An **Incident** is an occurrence resulting in property damage without any injury to employees or other persons.
- **Lost Time Injury (LTI)** is an injury serious enough that an employee is prevented from going to work on the next day.
- **Medical Aid** is defined as an injury not serious enough to require the employee to take any more than the day of the injury itself off of work, but serious enough to require medical treatment from a physician.
- A **Near Miss** constitutes an event in which an injury or damage might have taken place if conditions had been somewhat different.
- **Occupational Illness** is those medical conditions in which an employee suffers damage to their health from exposure to any workplace chemical, biological or physical agents.



## Role of Supervisor in an Accident Investigation

Both, the Site Health and Safety Coordinator and the immediate Supervisor must participate in thorough investigations and reporting, on an Accident Investigation Form of all incidents or accidents involving employees. They must also take witness statements and gather any and all other relevant information, and take care to see that any injured person receives needed medical treatment.

Supervisors should forward all such forms, statements and information gathered, to the Health and Safety Department / Responsible Person. If an employee requiring First Aid later needs further medical aid, the supervisor should notify the Health and Safety Department and have the treating doctor or therapist complete a Functional Abilities Form.

The supervisor should maintain contact with the injured employees as often as needed, or a minimum of weekly contact. Assistance is available from the Health and Safety Department.

### Step by Step Procedure:

1. A worker reports an accident at work to a supervisor.
2. Any first aid needed is provided.
3. The injured worker is taken to a hospital or doctor's office for further medical treatment.
4. The employee is provided with an Ensure Return to Work package.
5. Steps are taken, when there is a critical injury, to eliminate the hazard that caused the accident if that can be done, or guard the scene of the accident to prevent further injuries.
6. Preparation an Accident/Incident Report form spelling out the causes of the incident after an investigation.  
A copy of the report form should be sent to the Health and Safety Department.
7. Report all incidents or accidents including placing them in the following categories:
  - First Aid
  - Incidents and Near Misses
  - Lost Time Injuries
  - Medical Aid

Signed H Salim Position Director Date 01 / 07 / 2023



## Social Media Policy

This policy provides guidance for employee use of social media, which should be broadly understood for purposes of this policy to include blogs, wikis, micro blogs, message board chat rooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner. The following principles apply to professional use of social media on behalf of Westmid Services Group Ltd. as well as personal use of social media when referencing Westmid Services Group Ltd.:

- Employees need to know and adhere to the Company's Code of Conduct, Employee Handbook, and other company policies when using social media reference to Westmid Services Group Ltd..
- Employees should be aware of the effect their actions may have on their images, as well as Westmid Services Group Ltd. image / reputation. The information that employees post or publish may be public information for a long time.
- Employees should be aware that Westmid Services Group Ltd. may observe content and information made available by employees through social media. Employees should use their best judgement in posting material to ensure that it is neither inappropriate nor harmful to Westmid Services Group Ltd., its employees, or customers.
- Although not an exclusive list, some specific examples of prohibited social media conduct includes posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libellous, or that could potentially create a hostile work environment.
- Employees are not to publish post or release any information that is considered confidential or not public. If there are questions about what is considered confidential, employees should always check with the Human Resources Department and/or supervisor.
- Social media networks, blogs and other types of online content sometimes generate press and media attention or legal questions. Employees should refer these inquiries to authorized Westmid Services Group Ltd. spokes persons.



- If employees find or encounter a situation while using social media that threatens to become antagonistic, employees should disengage from the dialogue in a polite manner and seek the advice of a supervisor.
- Employees should get appropriate permission before you refer to or post images of current or former employees, members, vendors or suppliers. Additionally, employees should get appropriate permission to use a third party's copyrights, copyrighted material, trademarks, service marks or other intellectual property.
- Social media use shouldn't interfere with employee's responsibilities at Westmid Services Group Ltd.. Westmid Services Group Ltd. Computer systems are to be used for business purposes only. When using Westmid Services Group Ltd. computer systems, use of social media for business purposes is allowed (ex: Facebook, Twitter, Westmid Services Group Ltd. blogs and LinkedIn), but personal use of social media networks or personal blogging of online content is discouraged and could result in disciplinary action.
- It is highly recommended that employees keep Westmid Services Group Ltd. related social media accounts separate from personal accounts, if practical.

Signed \_\_H Salim\_\_\_\_\_ Position \_\_\_\_\_Director \_\_\_\_ Date\_01\_\_/\_07\_\_/\_2023\_\_\_\_\_



## ANTI- CORRUPTION AND BRIBERY POLICY

### 1. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

### 2. Policy statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

### 3. Scope

#### 3.1 Who is covered by the policy?

In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as **employees** in this policy). This policy covers:



Bribes;  
Gifts and hospitality;  
Facilitation payments;  
Political contributions;  
Charitable  
contributions.

### 3.2 **Bribes**

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, employees must not bribe a foreign public official anywhere in the world.

### 3.3 **Gifts and hospitality**

Employees must not offer or give any gift or hospitality:

which could be regarded as illegal or improper, or which violates the recipient's policies;  
or  
to any public employee or government officials or representatives, or politicians or political parties.

Employees may not accept any gift or hospitality from our business partners if:  
there is any suggestion that a return favour will be expected or implied.

Where a manager's approval is required above, if the manager is below Director level then approval must be sought from an appropriate Director.

If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to the employee's manager and donated to charity.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

Within these parameters, local management may define specific guidelines and policies to reflect local professional and industry standards. Where this policy requires written approval to be given, the Company Secretary shall put in place a process to maintain a register of all such approvals.



### 3.4 Facilitation payments and kickbacks

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to.

Our strict policy is that facilitation payments must not be paid. We recognise, however, that our employees may be faced with situations where there is a risk to the personal security of an employee or his/her family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

- Keep any amount to the minimum;
- Create a record concerning the payment; and
- Report it to your line manager.

In order to achieve our aim of not making any facilitation payments, each business of the Company will keep a record of all payments made, which must be reported to the Company Secretary/Account department, in order to evaluate the business risk and to develop a strategy to minimise such payments in the future.

### 3.5 Political Contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

### 3.6 Charitable contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices]. No donation must be offered or made without the prior approval of [the compliance manager.

All charitable contributions should be publicly disclosed.

## 4. Your responsibilities

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager **OR** the Company Secretary or the confidential helpline as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.



**5. Record-keeping**

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

**6. How to raise a concern**

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your line manager **OR** the Company Secretary or through the confidential helpline.

**7. What to do if you are a victim of bribery or corruption**

It is important that you tell the Company Secretary / Company head office, Accounts Dept. or the confidential helpline as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

**8. Protection**

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrong doing, are sometimes worried about possible repercussions. We aim 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.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform [the compliance manager] immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the company's Grievance Procedure.



**9. Training and communication**

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

**10. Who is responsible for the policy?**

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Company Secretary has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

**11. Monitoring and review**

The Company Secretary will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrong doing.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Company Secretary.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

Signed H Salim Position Director Date 01/07/2023



## Business Ethics Policy

The Westmid Services Group Ltd. believes that it is important for the Westmid Services Group Ltd. and its employees to maintain high ethical standards in order to preserve its reputation in the marketplace.

Good ethics are important to ensure that the Westmid Services Group Ltd. meets not only its objectives in a fair and equitable manner but its wider social responsibilities externally. In addition, the Westmid Services Group Ltd. is committed to ensuring high ethical standards within the workplace.

The procedure that follows provides general guidance on ethics and refers to other policies of the Westmid Services Group Ltd. where necessary. The procedure will be closely monitored and will be developed as necessary to ensure that it meets the needs of the Westmid Services Group Ltd., its employees and its stakeholders.

We will ensure that the Westmid Services Group Ltd. is meeting its aims with regard to social impact and ethical behavior and that its stakeholders perceive the Westmid Services Group Ltd. in a positive light.

### Procedure

1. All employees will be provided with ethics training as part of the induction program. Ongoing ethics training, as the ethics policy and procedure develops, will be cascaded to employees via management.
2. All employees are required to adhere to the Westmid Services Group Ltd.'s policy and procedure on business ethics. Employees who breach the Westmid Services Group Ltd.'s policy on business ethics will be subject to disciplinary action up to and including dismissal.
3. Employees who are faced with a potential breach of the business ethics code or have doubts about an ethical choice they are facing should, in the first instance, speak to their line manager.
4. The Westmid Services Group Ltd. has a Code of Conduct which employees are expected to abide by. A copy of the Code of Conduct and other policies relevant to this procedure are available on in the Staff Handbook



5. The following areas are included in this procedure. However, this list is not exhaustive and will be developed as required.
  1. Data protection/Access to employee data.
  2. Whistleblowing.
  3. The giving and receiving of gifts.
  4. Confidentiality.
  5. Relationships with competitors, suppliers, advertisers, etc.
  6. Equal opportunities, discrimination and harassment.
  7. Moonlighting.
  8. The environment.
6. The Data Protection Act 1998 requires that eight data protection principles be followed. These data protection principles are set out in the Westmid Services Group Ltd.'s Data Protection/Access to Employee Data policy and all employees are expected to familiarise themselves with its requirements. Employees should ensure that they understand how data protection impacts on their particular role, in particular with regard to external suppliers and customers. Employees who have any questions on the Westmid Services Group Ltd.'s Data Protection/Access to Employee Data policy should speak to their manager in the first instance.
7. The Westmid Services Group Ltd. encourages a free and open culture in its dealings between its officers, employees and all people with whom it engages in business and legal relations. The Westmid Services Group Ltd. recognises that effective and honest communication is essential if malpractice is to be effectively dealt with and the Westmid Services Group Ltd.'s success ensured.
8. The Westmid Services Group Ltd. does not believe that the giving and receiving of gifts from suppliers and customers is appropriate. In certain circumstances gifts may constitute a bribe. An employee who receives a gift from a customer or supplier, regardless of its value, must inform his or her manager who will decide whether the gift may be kept by the employee or whether it should be returned.
9. A confidentiality clause forms part of all employees' statement of particulars/contracts of employment. During the course of employment employees will have access to information of a confidential and sensitive nature. Employees must not disclose to a third party any Westmid Services Group Ltd. confidential information, either during their employment or after their employment has ended. Confidential information includes information on the Westmid Services Group Ltd.'s present or potential customers or suppliers and any information relating to the Westmid Services Group Ltd.'s business, including marketing, corporate or financial plans.



10. The Westmid Services Group Ltd. recognizes that work may result in friendships and closer relationships developing. Relationships may develop not only with colleagues but suppliers and customers. It is natural for relationships to develop in a working environment. While the Westmid Services Group Ltd. has every respect for the privacy of its employees, it asks that all employees consider the impact that personal relationships can have on the Westmid Services Group Ltd..
11. The Westmid Services Group Ltd. is committed to equality of opportunity and diversity in the workplace. It is the Westmid Services Group Ltd.'s policy to treat all job applicants and employees fairly and equally, regardless of their sex, trans-gender status, age, sexual orientation, religion or belief, marital status, civil partnership status, race, colour, nationality, national origins, ethnic origin or disability. Furthermore, the Westmid Services Group Ltd. will monitor the composition of the workforce and introduce positive action if it appears that this policy is not fully effective. Employees are required to conduct themselves in a way that promotes equal opportunities at all times. Good practice will be promoted by senior management and employees will be provided with relevant training. Employees who feel they have been discriminated against or suffered harassment should speak to a member of management immediately.
12. Employees may seek to take up separate employment with another employer or pursue outside business interests while still remaining employed by the Westmid Services Group Ltd.. Although the Westmid Services Group Ltd. has no desire to unreasonably restrict an employee's external activities, it must seek to protect its own interests and those of all its employees. Employees will not be permitted to undertake business activities or other work where the Westmid Services Group Ltd. considers that this is incompatible with its interests and, in any event, unless employees have obtained prior written authorisation from senior management.
13. The Westmid Services Group Ltd. is committed to conserving the Earth's resources and to do what it can to reduce any negative effects it has on the environment. Employees are required to use the Westmid Services Group Ltd.'s equipment and materials wisely and reduce wastage where possible. Employees can play a positive role in helping the environment by recycling all non-confidential waste, using printers and photocopiers with care and switching off electrical equipment which is not in use.

Signed H Salim Position \_\_\_\_\_ Director \_\_\_\_\_ Date 01 / 07 / 2023



## Covid/Coronavirus policy

We wanted to write to you regarding our Covid/Coronavirus policy to try and keep everyone safe and well during the current situation and our policy in relation to security guard services, we provide to our clients. This is in line with government advice on their website [www.gov.co.uk](http://www.gov.co.uk). we have also added some further safely measures above and beyond the advice which are implemented to ensure safety of all including our staff, employees and clients.

First and foremost if you have any symptoms of the virus or have come into contact with anyone with the virus then please notify management as soon as possible. Please let us know if any staff member is unwell or showing any symptoms.

In line with government's advice, those who are shielding or otherwise clinically vulnerable should ensure they are aware of the medical advice, including staying at home and avoiding unnecessary contacts over this period, if possible.

All staff should be equipped with PPE including hand gel, gloves and masks. Protective PPE, e.g; gloves, Mask must be worn all Times, Cleaning of hands with sanitizer every 30 minutes.

Maintain the 2 meter distance while talking with Manager / Supervisor. Ensure that proper sanitizing of your surroundings while you are working. Inform control regarding any Fever or symptoms of Covid -19.

Ensure that the cabin is kept clean and tidy. Ensure there is hand sanitizers, paper towels and disinfectant spray at the security officer cabin to ensure that hygiene is maintained. All radios, mobile phone and other equipment's to be cleaned before the start of the shift with disinfectant wipes, Make sure you use gloves to open all handles and doors and other electronic equipment which officers use on daily basis to avoid the spread of virus on any surface.

In addition, we would ask that you call or email us where possible to reduce any face-to-face contact. If you would like to visit our office, we would ask if you could please call us beforehand so we can let you know our safe arrangements we have put in place after risk assessing our offices.

If you have any further specific questions, please let us know and we would be happy to help.

Signed \_\_H Salim\_\_\_\_\_ Position \_\_\_\_\_Director \_\_\_\_ Date\_01\_\_/\_07\_\_/\_2023\_\_\_\_\_



## **Modern slavery Policy Statement**

This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help. This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Westmid Services Group Ltd. has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Westmid Services Group Ltd. has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Our Suppliers**

Westmid Services Group Ltd. operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery [and on site audits which include a review of working conditions]. All Our suppliers are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light.

### **Training**

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

### **Our performance indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain.

Signed H Salim Position Director Date 01 / 07 / 2023



## Environmental Policy

Westmid Services Group Ltd. wishes to ensure that their employees that we minimize any negative impact our operations could potentially have on the environment.

Accordingly, our policy is to:

- Always strive to better our performance regarding environmental issues and use the best environmental management practices as part of our business operations.
- Try to minimize our use of resources and to attempt to efficiently use those resources that we must consume.
- Attempt to reduce our carbon footprint to comply with our targeted objectives.
- Responsibly apply the principles of waste reduction, waste reuse and waste recycling as per our waste management practices.
- Try to prevent pollution at our premises and work sites.
- Take environmental issues and energy performance into account in facility purchases, design, refurbishment and management.
- Take environmental issues, including climate change, into account when buying services and goods.
- Obey all applicable environmental laws and regulations.

The company monitors progress on these goals, seeks feedback from employees and customers on these issues, and informs employees about the importance of environmental issues. We work with our employees, service partners, landlords and their agents and customers to improve our performance on environmental issues. We take sustainability and other environmental issues into account when providing security services.

Signed H Salim Position Director Date 01/07/2023



## ENVIRONMENTAL POLICY

Westmid Services Group Ltd is privately owned Security Company supplying professional and effective Security Guarding solutions to the Industrial, Commercial and Retail sectors this is managed by operating an Environmental Management System (EMS) in accordance with the requirements of ISO 14001: 2015.

WSG will promote awareness of the need to protect the environment, by implementing a policy to all its employees and nurturing a culture of continuous improvement & prevention of pollution. Promote a forward thinking, environmentally aware organisation. Reduce consumption of resources and improve the efficient use of those resources. Measure and take action to reduce the carbon footprint of the business activities. WSG will ensure that all company activities comply with all relevant environmental regulations. We will always abide to legal requirements.

### **1. We will avoid waste by;**

Reducing the production of waste material, including unnecessary packaging when we forward information or equipment, including returns. Encouraging the re-usage of re-usable materials. Disposing of waste in a safe and responsible manner.

### **2. We will ensure that water and energy are not wasted during the conduct of our business activities by;**

Ensuring energy is used only where necessary. It will be used efficiently, and its use will be reduced where possible. Preventing pollutants entering our drainage system. Using water wisely and efficiently.

### **3. Materials and Resources**

We will maximise the amount of recycled paper and other materials from sustainable sources.

We will utilise and rely more on electronic communications where the opportunity exists.

We will purchase products with the principle and policy of using materials in a sustainable way.

We will have a major emphasis on purchasing locally made goods to support our business.

We will purchase equipment with an emphasis on long term usage.

### **4. Travel**

We shall avoid unnecessary travel during the course of our business by encouraging the sharing of transport, as well as making all employees and Managers aware of Public Transport that is available.

### **Client Savings**

The company will, at all times, endeavour to eliminate waste during our security services activities.

This will be initially identified during the security analysis and risk assessment. The security staff deployed will then apply these in a practical way via the assignment instructions by e.g. switching lights off and this will be a continuous ethic and culture at both local and national levels"

### **Responsibility of Management:**

This policy will be communicated to all employees and organisations working for or on our behalf.

Employees and other organisations are expected to cooperate and assist in the implementation of this policy, whilst ensuring that their own work, so far as is reasonably practicable, is carried out without risk to themselves, others, or the environment.

This policy will be reviewed annually by top management and where deemed necessary will be amended and re-issued. Previous versions of this policy are archived.

This policy is available to relevant interested parties, upon reasonable request.



**This Policy is confirmed and authorized by the signature below**

Haroon Salim

Director  
01/07/2023



## QUALITY POLICY

The purpose of the QMS is to ensure that the products and services provided to our customers consistently meet or exceed their expectations. The company operates a system that regularly evaluates its processes and customer needs, and has set quantifiable goals with plans in place to ensure that they are improved year on year in accordance with ISO 9001 & ISO 14001 – Quality system requirements, BS 7858, BS 10800, BS7984 & BS 7499.

The Scope of our QMS is Provision of Security Guarding Services for the purpose of ISO9001-2015 Clauses 7.1.5 monitoring and measuring resources & 8.3 design and development of products and services are not applicable

It is the policy of WSG to maintain, on a continual basis, an effectively managed Quality Assurance programme, which will assure customers that the products supplied conform to the laid down procedures or disciplines of the company, which will ensure that we meet the customers' needs and expectations.

The management of WSG is firmly committed to the procedures included in this manual, and the total participation of all personnel is mandatory.

The Management Representative is entrusted with the authority and responsibility for the control of the Quality Management System. Ensure the quality policy and quality objectives are established for the QMS and are compatible with the context and strategic direction of the Company. Promote the use of a process approach and risk-based thinking.

Quality objectives have been set and are maintained as part of the QMS internal auditing, monitoring and management review processes, to enhance customer satisfaction.

Establish partnerships with suppliers and interested parties to provide an improved service. Engage, direct and support persons to contribute to the effectiveness of the QMS.

The Quality Manager cannot be over-ruled on matters of Quality and in the event of differences of opinion on Quality matters, has the responsibility to refer such items to the Managing Director for resolution.

This policy of Quality Assurance is in place to ensure that the overall organisational goals of the company are met. The goals of this company are to ensure that the best possible product is supplied to our valued clients, and that we are able to meet their needs and requirements as effectively and efficiently as possible.

This policy will be communicated to all employees and organisations working for or on our behalf. Employees and other organisations are expected to co-operate and assist in the implementation of this policy, whilst ensuring that their own work, so far as is reasonably practicable, is carried out without risk to themselves, others, or the environment. This policy will be reviewed annually by top management and where deemed necessary will be amended and re-issued. Previous versions of this policy are archived.

This policy is available to relevant interested parties, upon reasonable request.

**This Quality Policy is confirmed and authorized by the signature below**

**Haroon Salim**

**Director**

**Dated: 01/07/2023**



## Document & Records Control Procedure

Authorises and controls all system documents and specifies the requirements for filing & archiving.

### ITEM DOCUMENT CONTROL PROCEDURE

#### A SYSTEM AUTHORISATION

##### Initial Document Authorisation

List all documents used in the IMS on the Document Control Register. Authorise all documents at Version 1/date of issue

##### Document Changes

Verify that standards & policies will be maintained/updated as necessary.

Update the revision status of the document changed (e.g. Version 1/date to Version 2/date etc)

If a new document is introduced, list it on the Document Register and start it at Version 1/issue date.

If documents are removed from system specify reasons on a Management Review Record

Record all changes on the Document Control Register.

Withdrawn or superseded system documents shall be marked as such and filed appropriately

#### B DOCUMENT CONTROL

##### Current Status of System Documents

Documents used in the IMS **must** reflect current status.

The status of previous versions of any form or record can be reviewed via the Document Control Register.

##### Control of External Standards

A Standards Register shall be established to record all Standards that need to be in a controlled condition or held for reference purposes only

Verification of the status shall be at frequencies specified on the Management Review Schedule

#### C DOCUMENT STORAGE

##### Location of Documents

Locate forms/records/data where specified within the Document Control Register

### ITEM RECORD CONTROL PROCEDURE



## Record Management

All personnel operating the IMS shall ensure that:

1. Records are legible, accurate and complete, including any endorsements by authorised signatories
2. Records are identifiable to the item or activity to which they apply. Job files shall be structured/managed to provide full traceability of job-specific documents and storage cabinets/containers shall be clearly marked with contents.
3. Records are progressively collated and filed through the period of the contract. Filing shall be by part number, contract number or other applicable means.
4. Records are stored in a secure location
5. Records are restricted to access by authorised personnel only
6. Records are located to minimise risk of damage by fire, flood, theft, condensation etc.
7. Personnel shall ensure that electronic data is backed up at timely intervals. The backup medium shall be held either in a fireproof safe or off site (refer Process Resource Management)
8. Documents should be kept for a minimum of **5** years from the date of completion of use, or for longer if specified by customers or regulatory requirements. Only the System Manager can authorise the destruction of records, which must be by permanent means such as shredding or equivalent method which prevents further use.

## Archiving Records

Archiving containers shall specify "date to be destroyed" or "indefinite"

Disposal of records shall be by shredding or by approved external contractor. Refer Supplier Control

Sign .....Haroon Salim..... Date .....01/07/2023.....

Review Date: 01/07/2024



## Communication Procedure

### Scope

The organisation is committed to operating in a manner sensitive to the environment and conserving natural resources and has created an Environmental Management System which contains its Environmental Procedure, Environmental Policy and Emergency Procedure. The organisation recognises that internal communication is important to ensure the effective implementation of the Environmental Management System. Similarly, the organisation must respond to relevant communications from interested external parties.

### Procedure

- **Internal Communication.** Management have identified sources of potential accidents and emergencies and will ensure that correct procedures are in place to eliminate or minimise consequences via Environmental Performance Evaluations and Improvement Logs. The Environmental Manager is responsible for conducting regular team briefings to ensure that all employees are aware of the aspects and objectives identified in the Environmental Performance Evaluations and their responsibilities in achieving objectives and minimising risk. In particular, the Environmental Manager must ensure that the Emergency Procedure is available to, and understood by, all employees. The effective application of this Procedure is to be reviewed at each Management Review meeting. The Quality & Environmental Management System manual is held by the Managing Director and is available to all employees.
- **External Communication.** The organisation will make its Environmental Policy available upon request. All communication from external parties relating to the organisation's Environmental Management System will be passed to the Managing Director for consideration and action. The organisation will not communicate externally about its significant environmental aspects.

Sign ...H Salim..... Date ..... 01/07/2023.....

Review Date: 01/07/2024



# Emergency Policy

## Scope

The Environmental Procedure confirms the organisation's commitment to operating in a manner sensitive to the environment and conserving natural resources. As such, the organisation has reviewed its operational activities and identified those aspects that have an environmental aspect which it can control.

## Procedure

Management have identified sources of potential accidents and emergencies and will ensure that correct procedures are in place to eliminate or minimise consequences via Environmental Performance Evaluations. The Managing Director is responsible for:

- Identifying areas which have the potential for accidents or emergencies with significant environmental effects
- Compiling emergency plans which detail the response procedures
- Reviewing such plans and ensuring that any actions are implemented.
- Ensuring those sufficient resources in terms of personnel, training and equipment are available in order that emergency plans operate effectively
- Ensuring that site plans are available detailing location of interceptors and potential hazards eg oil stores, paint etc.
- 

**Emergencies** The health and safety of all employees are paramount and no actions involving personal risk should be undertaken.

- **FIRE.** The Managing Director or his designated replacement should liaise with the **Fire Brigade** in order to clarify all relevant aspects including the minimisation of environmental impact. **Telephone 999**
- **SPILLAGE.** The spilled material is to be contained by using temporary containment eg spill kits, absorbent granules, sandbags or earth. Suitable protective clothing and gloves should be worn if there is a likelihood of personal contact with the spilt material. Attempt to clean the area with absorbent granules, paper towels or other materials that will assist in minimising the impact. **NB Do not hose down spilled materials or use chemical dispersants.**  
Any soiled waste or contaminated ground should be collected into the drums made available for the purpose and clearly labelled (e.g. oil), and disposed of by a licensed disposal contractor to a controlled waste facility.

**NB Environmental Health Authority Incident Hotline: 0800 807060**

Sign .....H Salim..... Date.....01/07/2023.....

Review Date: 01/07/2024



## Safe Working Practice

**RISK ASSESSMENT** General Lifting Techniques

**RISKS IDENTIFIED** Back strain, Muscle strain, Hand/Limb Injuries

**LEGISLATION** Manual Handling Operations Regulations 1992

**AT RISK** All staff

On occasions it will be necessary for employees to lift packages or objects and to perform other incidental manual handling tasks. The most common cause of back strain and other lifting related injuries is not the weight of the object, but incorrect lifting methods. No attempt should be made to lift a load that is too heavy or difficult you must seek assistance or reduce the weight of the load.

### 1. Rules for lifting are:

- a. Keep the body upright
- b. Distribute your weight evenly and allow your feet to adjust for movement
- c. Avoid bending and twisting on rigid legs
- d. Distribute stress evenly throughout the body
- e. Hold the load close to your body as possible
- f. Use any lifting devices that may be available
- g. If lifting with colleagues lift in unison
- h. When lifting items from ground level, bend your knees and look up when commencing the lift

### 2. Remember:

- a. Do not attempt to lift a load that may be too heavy or difficult and causes any feeling of strain
- b. Do not stand holding a heavy load
- c. Do not change grip whilst carrying. Put the load down first
- d. Carrying a load under the arm, using the hip to support the load can cause strain
- e. Slippery floors are dangerous, especially on stairs and steps
- f. Releasing a load is as potentially dangerous as picking up loads, so care must be taken
- g. Do not lift and twist when lowering a load, guide it down

### 3. Always consider:

- a. The weight of the load
- b. The condition of the floor
- c. The headroom available



d. The distance to be carried

At WSG we try to protect others as well as ourselves whilst in the work place.

We try to prevent hazards such as; cabling - to be located around the walling area and NOT across the walkways, all fire exits to be kept clear at all times, computers/VDU's not to be used for long periods, short breaks should be taken to relax the eyes. If any hazards are identified it should be brought to the department managers' attention and he/she will get it rectified.

**Security guards working on site**

Unfamiliar surroundings whilst working on a construction site can be very dangerous and extreme caution when patrolling is imperative, so if there is any hazards/concerns, the guard will write on his/her daily log sheet and when handing over to the Site Agent/Manager he must bring these concerns to their attention. The guard must also highlight his written concerns so that any on coming guard is aware if the concerns have not been rectified. The Duty supervisors will also be notified of any concerns the guard has so as to protect other members of staff.

Sign .....H Salim..... Date ..... 01/07/2023.....

Review Date: 01/07/2024



## Appeals Procedure

The company has a process for appealing against the process and/or decisions made at a disciplinary or grievance hearing.

You have the right to appeal at each and every stage of the disciplinary or grievance processes, if you do not feel the way the hearing was conducted, the decision and/or the penalty issued has been fair and reasonable.

- If you wish to appeal following any disciplinary or grievance hearing, then you **must** notify the company, in writing, within 7 days following the hearing date.
- The letter should outline your grounds for the appeal.
- Your employer will arrange an appeal hearing as soon as possible and in any case within 5 working days of receipt of this letter.
- You will receive a letter inviting you to the appeal which will outline the time and date of the meeting and the names of those who will be hearing the appeal. You have the right to be accompanied by a work colleague or Trade Union representative at this meeting.
- The appeal will be heard by a more senior manager or Director; however, if due to the size of the company this is not possible, then another manager should normally hear your appeal. This will not always be the case in very small companies.
- Once your appeal has been heard, you will be informed of the decision.
- A letter outlining the decision will also be sent to you within a reasonable time outlining the reasons for the decision. This will also state whether this appeal was the final step of the process or whether further representation is available to you.

Sign ..... H Salim..... Date ..... 01/07/2023.....

Review Date: 01/07/2024



## Grievance and Disputes Policy

### GRIEVANCE/DISPUTES

If you have a grievance relating to your working environment or to a specific member of staff, you may initiate the Grievance Procedure to resolve the issue.

#### Informal Discussions

- If you have a grievance about your employment or about a member of staff, you should discuss it informally with your immediate line manager. It is hoped that most concerns will be resolved at this stage.

#### Step 1 – in writing to your Line Manager:

- If you feel that the matter has not been resolved through informal discussions, you must put your grievance in writing to your line manager. If the grievance relates to an issue with your line manager, then this should be put in writing to the next manager in seniority.

#### Step 2 – invitation to a meeting:

- You will receive a reply within 5 working days inviting you to a meeting where you will be able to raise your grievance. You have the right to be accompanied by a work colleague or Trade Union representative at this meeting.
- You must take all reasonable steps to attend this meeting.
- Once the grievance has been discussed, a decision will be sent to you in writing within a reasonable time.

#### Step 3 – appeal hearing by Senior Manager/Director:

- In the event of you being unhappy or dissatisfied with the decision, then your line manager will arrange an appeal hearing as soon as practicable, which will be heard by a more senior manager or Director. If due to the size of the company this is not possible, then another manager should normally hear your appeal.
- You will receive a letter within 5 working days inviting you to the appeal which should take place as soon as practicable. You have the right to be accompanied by a work colleague or Trade Union representative at this meeting.
- Once your grievance has been heard at appeal, a letter outlining the decision will be sent to you within a reasonable time and will also state whether this was the final step of the process or whether further representation is available to you.

**Please note:** Written records will be maintained in respect of the nature of grievance, written correspondence, conversations, actions and decisions taken and the reasons for these. In the event of an appeal, records regarding this and any subsequent actions or developments will also be kept.

Sign .....H Salim..... Date ..... 01/07/2023.....

Review Date: 01/07/2024



## PENSION POLICY

### Introduction

The aim of this policy is to comply with any relevant legislation and set out the Pension arrangements to which all employees are entitled. Membership WSG scheme is not automatic if you wish to apply you must do so within 6 months of joining WSG or within 6 months of the scheme start date. If you do not do so, you will WSG Ltd.'s consent to join and you may also be required to provide additional information before WSG consider your request to join.

WSG wishes to encourage and help all its employees have an independent and protected retirement and to promote the benefits of having a secure income in retirement.

Both employers and Government are working together with the financial services industry, to help people plan for their retirement and make informed choices about how and when to save and how long to work. It is with this in mind that WSG advises that every employee should consider their long-term plans for retirement.

### Policy

- WSG will encourage every employee to consider their retirement.
  
- WSG will provide a scheme as it is required to do under the "employer access requirement" of The Welfare Reform and Pensions Act 1999.
  
- WSG is fully aware it does not have the resources and/or the skills to provide every employee proper independent financial advice therefore WSG will recommend employees seek independent financial advice.
  
- WSG will not force any employee to join the scheme. Any employee not wishing to take up the scheme will be required to complete a pension scheme opt out form.
  
- WSG may consider not to provide a scheme if it employees less than five employees.



- WSG may exclude from the scheme employees under the age of 18 or employees with less than 5 years before their due retirement date.
- The requirement for WSG to make any contributions to the scheme as the employer shall remain discretionary.

### **Monitoring Policy**

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively.

The following will be monitored:

- That all prospective employees are advised of the policy.
- That the policy forms part of the induction program.
- Assessment of any reported incident or related occurrence.

Monitoring of the policy is essential to assess how effective WSG has been to establish control of its obligations.

### **Reviewing Policy**

This policy will be reviewed and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review.

### **Policy Amendments**

Should any amendments, revisions, or updates be made to this policy it is the responsibility of WSG senior management to see that all relevant employees receive notice. Written notice and/or training should be considered.

### **Additional Information**

If you require any additional information or clarification regarding this policy, please contact your manager. In the unlikely event where you are unhappy with any decision made you should use WSG formal Grievance Procedure.

To the extent that the requirements of this policy reflect statutory provisions, they will alter automatically when and if those requirements are changed.

Other relevant policies:

Equal Opportunity, Diversity and Inclusion Policy

Further information about Pensions can be found at:

The Pension Service

The Pension Service provides impartial Government information and advice.

[www.thepensionsservice.org.uk](http://www.thepensionsservice.org.uk)

Directgov



Provides Information for working families.

[www.direct.gov.uk](http://www.direct.gov.uk)

#### References

- [Directgov](http://www.direct.gov.uk) Pension rules from April 2006 [www.direct.gov.uk](http://www.direct.gov.uk)
- [DWP](http://www.dwp.gov.uk): Pension scheme changes and retirement polices [www.dwp.gov.uk](http://www.dwp.gov.uk)
- [ACAS](http://www.acas.org.uk): Pensions [www.acas.org.uk](http://www.acas.org.uk)
- [Business link](http://www.busineTSMink.gov.uk): Set up employment policies [www.busineTSMink.gov.uk](http://www.busineTSMink.gov.uk)
- [The Pension Service](http://www.thepensionservice.org.uk). Guide for employees [www.thepensionservice.org.uk](http://www.thepensionservice.org.uk)

#### Policy Implementation Notice

This is the policy statement of: WSG

The overall and final responsibility for this policy is that of: (Directors or Proprietors)

Signed:

Position:

Date:

Day-to-day responsibility for ensuring this policy is put into practice is delegated to:

\_\_\_\_\_

Policy review date: 01/07/2024

#### Terms and Conditions of Use

WSG clearly understands the information provided is only a guide to good practice; it is up to each client to see that it meets the need of their circumstances or industry. In no way whatsoever should the information provided be taken as an interpretation of the law. Such an interpretation can only be given by the employment tribunals and by the courts. Every reasonable effort has been made to ensure the accuracy of the information contained in this document; it may include inaccuracies or typographical errors and will be changed or updated without notice.



Signed: H. Salim

Position: Director

Date: 01/07/2022



## Code of Conduct

In order to ensure that the services provided by WSG to client organisations (“Clients”) are of high quality all associates are expected to adhere to a code of conduct.

The performance management process will be determined by WSG and details will be notified to the associate by WSG from time to time. The principles set out are intended to be rigorous, transparent, fair and aspirational.

### AIMS

The aims of this Code of Conduct are:

- To ensure the provision of high quality services, professional advice, assessment and feedback to meet the needs of clients.
- To uphold and advance the good standing and reputation of WSG, and
- To promote the value to clients of working with WSG.

### STANDARDS:

The discharge of their duties requires the associate to use and apply skills and judgement and to exercise professional and ethical behaviour at all times.

In particular the associate shall:

- Act to meet the requirements of the client as specified by the client from time to time and requirements of WSG.
- Seek and act on feedback from clients and WSG on their own performance;
- Understand and promote equal opportunities and fair practice in their assignments and in their actions.
- Meet and where possible, exceed the standards as set out by WSG.
- Maintain high standards of personal conduct, courtesy, integrity, honesty, financial management, loyalty and fairness.
- Achieve satisfactory exposure (as required by WSG) by the Criminal Records Bureau every three years from the date of commencement of employment.

### WORKING PRACTICES:

In relation to working with clients, associates shall:



- Provide high quality service, advice, feedback and recommendations that are realistic, practicable, cost-effective and understood by the client;
- Declare to WSG any existing or potential conflict of interest prior to undertaking any assignment with a client;
- Have due regards for, and comply with, all current legislation and all codes of conduct applicable to their role;
- Have due regards for, and comply, with any guidelines and standards issued from time to time by WSG relating to the delivery of service and advice;
- Hold all information concerning the affairs of a client gained or obtained during an assignment in the strictest confidence;
- Associates acting in relation to a client before, during or after completion of a WSG assignment, must not seek to procure or procure chauffeur or security work for themselves or for a third party, and will promptly refer any work in relation to such client to WSG;
- Plan for and carry out an annual programme of professional development (to be agreed with WSG) in order to ensure that knowledge and skills are kept up to date;
- Communicate fully and continuously with parties notified to it from time to time by WSG on the progress of assignments.

**Associates shall not:**

- Make any misleading or potentially misleading claim about their relationship with any client or their ability to secure support for a client;
- Accept any gift or inducement from clients or any third parties which compromises or may compromise their independence.

**ASSOCIATES SHOULD NOTE THE FOLLOWING (INCLUDING THE AIDING AND ABETTING OF OTHERS) CONSTITUTES A BREACH OF THEIR CONTRACTUAL TERMS AND CONDITIONS WITH WSG:**

- Failure to comply with the service provider's policies, procedures and instructions;
- Neglecting to complete a required task at work promptly and diligently, without sufficient cause;



- Leaving a place of work without permission, or without sufficient cause;
- Making or signing a false statement, of any description;
- Destroying, altering or erasing documents, records or electronic data without permission or through negligence;
- Divulging matters confidential to the service provider or customer, either past or present, without permission;
- Soliciting or receipt of gratuities or other consideration from person, or failure to account for keys, money or property received in connection with business;
- Incivility to persons encountered in the course of duties, or misuse of authority in connection with business;
- Conduct in a manner likely to discredit to the service provider, client or fellow associate;
- Use of uniform, equipment or identification without permission;
- Reporting for duty under the influence of alcohol or restricted drugs, or use of these whilst on duty;
- Failure to notify WSG immediately of any:
  - 1) conviction for criminal and/or motoring offence;
  - 2) indictment for any offence;
  - 3) police caution; or
  - 4) legal summons
- Permitting unauthorised access to a clients premises;
- Carrying of equipment not issued as essential to an employee's duties, or use of a clients equipment or facilities without permission;
- Not maintaining agreed standards of appearance, identification and deportment whilst at work.

## **PERSONAL APPEARANCE AND CONDUCT.**

WSG Associates should:

- 1) At all times maintain agreed standards of personal appearance and deportment appropriate to the event/function and will never act in a manner likely to bring discredit on WSG or the client:
- 2) Greet visitors to any event/function in a friendly and courteous manner;



- 3) Use moderate language at all times when dealing with members of the public and other members of staff;
- 4) Act fairly and not unlawfully discriminate against any person on the grounds of colour, race, religion, sex or disability and should always be prepared to justify their actions;
- 5) Never solicit or accept any bribe or other consideration from any person, nor fail to account for any money or property received during the course of duty;
- 6) Not fraternise with customers, friends or relations while on duty;
- 7) Not drink alcohol while on duty, or be under the influence when reporting for duty;
- 8) Never abuse their position of authority and immediately report any incident or involvement with the police that may affect their continued employment as a Event/Security officer.

#### **DUTIES AT THE EVENT/FUNCTION:**

At events and functions WSG associates will:

1. Take directions from the client's on-site management team. WSG associates derive their authority on-site from the client's legal powers and responsibilities. If any client directions or requirements are contrary to WSG policy, procedure or previously issued orders WSG associates should refer the client to the duty WSGsupervisor/manage
2. Keep confidential all security arrangements and keep informed of any changes to those arrangements;
3. Refuse access to anyone whose presence at the event/function might render the person in charge of the event subject to prosecution for any offence;
4. Ensure that consent is obtained from each customer in front of witnesses prior to any search taking place, if personal searches are required as a condition of entry;
5. Not search individuals of the opposite sex and ensure that any items seized are dealt with strictly in accordance with the venue policy;
6. Maintain good order on the premises and to ensure the safety of the public by awareness of fire and emergency equipment and evacuation procedures;
7. Use tact and diplomacy as the first tool to control any conflict; then, if tact and diplomacy do not work, to use only minimum amount of force required for the intended purpose;



8. Protect the premises and property against damage and theft.

**INCIDENT PROCEDURES:**

In the event of an incident WSG associates will:

1. Activate any Emergency Action Instructions in place for the event.
2. Act immediately to save life and secure property as appropriate in the circumstances
3. Note and report incidents in the daily logbook for the information of the security team, the event/function Supervisor and client management team;
4. Assist the emergency services in whatever way they request and ensure they are not obstructed in the execution of their duties;

**COMPLAINTS:**

In the event of a complaint WSG associates will follow the WSG Complaints policy.

Sign .....H Salim.....Date: 01/07/2023.....

Review Date: 01/07/2024



## Sample Model Whistle Blowing Policy and Procedure

The following agreement uses the kind of language which employers might require and use themselves. Have a look at what it says. You can pick and choose what you need, and you don't need to stick to the precise wording.

### WHISTLE BLOWING AT WORK.

#### Introduction

1 The word whistleblowing in this Policy refers to the disclosure internally or externally by workers of malpractice, as well as illegal acts or omissions at work.

#### Policy statement

2 WSG is committed to achieving the highest possible standards of service and the highest possible ethical standards in public life and in all of its practices. To achieve these ends, it encourages freedom of speech. It also encourages staff to use internal mechanisms for reporting any malpractice or illegal acts or omissions by its employees or ex-employees.

#### Other policies and procedures

3 WSG has a range of policies and procedures, which deal with standards of behavior at work; they cover Discipline, Grievance, Harassment and Recruitment and Selection. Employees are encouraged to use the provisions of these procedures when appropriate. There may be times, however, when the matter is not about your personal employment position and needs to be handled in a different way. Examples may be:

- Malpractice or ill treatment of a patient/client/customer by a senior member of staff
- Repeated ill treatment of a patient/client/customer, despite a complaint being made
- A criminal offence has been committed, is being committed or is likely to be committed
- Suspected fraud
- Disregard for legislation, particularly in relation to health and safety at work
- The environment has been, or is likely to be, damaged
- Breach of standing financial instructions
- Showing undue favour over a contractual matter or to a job applicant
- A breach of a code of conduct
- Information on any of the above has been, is being, or is likely to be concealed

*This list is not exhaustive.*

WSG will not tolerate any harassment or victimization of a whistleblower (including informal pressures), and will treat this as a serious disciplinary offence, which will be dealt with under the Disciplinary Rules and Procedure.

#### Role of Trade Unions

4 WSG recognizes employees may wish to seek advice and be represented by their trade union(s) officers when using the provisions of this policy, and acknowledges and endorses the role trade union officers play in this area.

#### Designated officers

5 The following people have been nominated and agreed by WSG as designated officers for concerns under this procedure. They will have direct access to the most senior person in the organization.



## **1- Haroon Salim**

### **Role of designated officer**

**6** Where concerns are not raised with the line manager, the designated officer will be the point of contact for employees who wish to raise concerns under the provisions of this policy. Where concerns are raised with him/her, he/she will arrange an initial interview, which will if requested be confidential, to ascertain the area of concern. At this stage, the whistleblower will be asked whether he/she wishes his/her identity to be disclosed and will be reassured about protection from possible reprisals or victimization. He/she will also be asked whether or not he/she wishes to make a written or verbal statement. In either case, the designated officer will write a brief summary of the interview, which will be agreed by both parties.

### **Role of the most senior person in the organization**

**7** The designated officer will report to the most senior person in the organization, who will be responsible for the commission of any further investigation.

### **Complaints about the most senior person in the organization**

**8** If exceptionally the concern is about the most senior person in WSG this should be made to the chair of the board/governing body, who will decide on how the investigation will proceed. This may include an external investigation.

### **The investigation**

**9** The investigation may need to be carried out under the terms of strict confidentiality i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. This may be appropriate in cases of suspected fraud. In certain cases, however, such as allegations of ill treatment of patients/clients/ customers, suspension from work may have to be considered immediately. Protection of patients/clients/customers is paramount in all cases.

**9.1** The designated officer will offer to keep the whistleblower informed about the investigation and its outcome.

**9.2** If the result of the investigation is that there is a case to be answered by any individual, the Disciplinary Rules and Procedure will be used.

**9.3** Where there is no case to answer, but the employee held a genuine concern and was not acting maliciously, the designated officer should ensure that the employee suffers no reprisals.

**9.4** Only where false allegations are made maliciously, will it be considered appropriate to act against the whistleblower under the terms of the Disciplinary Rules and Procedure.

### **Inquiries**

**10** If the concern raised is very serious or complex, an inquiry may be held.

**10.1** WSG recognizes the contribution the trade union(s) can make to an inquiry and agrees to consult with the trade union(s) about the scope and details of the inquiry, including the implementation of the recommendations of the inquiry. WSG recognizes that in many cases it will be desirable that a trade union(s) representative will be appointed to the panel of the inquiry.

### **Following the investigation.**

**11** The most senior person in the organisation will brief the designated officer as to the outcome of the investigation. The designated officer will then arrange a meeting with the whistleblower to



give feedback on any action taken. (This will not include details of any disciplinary action, which will remain confidential to the individual concerned). The feedback will be provided within the time limits (to be specified).

**11.1** If the whistleblower is not satisfied with the outcome of the investigation, WSG PSServices recognizes the lawful rights of employees and ex-employees to make disclosures to prescribed persons (such as the Health and Safety Executive, the Audit Commission, or the utility regulators, or, where justified, elsewhere).

**The Law**

**12** This policy and procedure has been written to take account of the Public Interest Disclosure Act 1998, which protects workers making disclosures about certain matters of concern, where those disclosures are made in accordance with the Act's provisions. The Act is incorporated into the Employment Rights Act 1996, which also already protects employees who take action over, or raise concerns about, health and safety at work.

The spoke for the company is **Mr H Salim**.

Sign .....H Salim.....Date.....01/07/2023.....

**Review Date:** 01/07/2024



## Bullying & Harassment Policy

It is the policy of WSG LTD to prohibit bullying or harassment of any employee by another employee, supervisor or manager. The purpose of this policy is to provide a workplace that is free from bullying and unlawful harassment. This policy prohibits harassment in any form, including harassment based on gender, unwelcome sexual advances, verbal, visual or physical conduct of a sexual nature, such as uninvited touching or sexually explicit materials such as pictures, books, posters and the like.

Management will attempt to confidentially investigate charges of bullying or harassment. Any employee found to be in violation of Company policy may receive disciplinary action up to and including dismissal.

Any employee who feels that he or she has been subject to, or has knowledge of, any harassment should immediately report the matter to your line manager. If you do not feel comfortable speaking to your line manager, please contact your line Manager, or a Director of the Company.

Sign .....H Salim.....Date ..... 01/07/2023.....

Review Date: 01/07/2024



## **Disability Discrimination Policy Statement**

**WSG Ltd is committed to Disability Discrimination Act 1995.**

**To make it unlawful to discriminate against disabled persons in connection with employment, the provision of goods, facilities and services or the disposal or management of premises; to make provision about the employment of disabled persons; and to establish a National Disability Council. (8<sup>th</sup> November 1995).**

**This Statement should be reviewed within 6 months of the date listed below.**

**H Salim**

Sign .....H Salim.....Date ..... 01/07/2023.....

**Review Date: 01/07/2024**



## Welfare Policy

### 1. Purpose:

Welfare has been described as a total concept. It is desirable state of existence involving the physical, mental, moral and emotional wellbeing. Anything done towards the wellbeing of labor force comes under the purview of Labor Welfare. Welfare measures need not be in monetary terms only but in any kind/forms.

Labor welfare facilities provides healthy working environment & develop sense of belongingness towards organization among workers. It makes workers more responsible & efficient.

The liberalization, privatization and globalization of Indian economy in the past few years have presented unprecedented challenges to the decision makers in the MNCs to compete in the global market with competitive edge of products. This objective could not be achieved until and unless the workers are highly satisfied with the working environment and welfare facilities; it has an important impact on Industrial Relations.

### 2. Scope:

It is applicable for all employees of all categories.

### 3. Responsibilities:

International Labor Organization includes under the term Labor welfare "such services, facilities and amenities which may be established in the vicinity of undertakings to enable the persons employed therein to perform their work in healthy and congenial surroundings and to provide them with amenities conducive to good health and good morals"

Human resource department is responsible to maintain the Employee welfare which includes monitoring of working conditions, creation of industrial harmony through infrastructure for health, industrial relations and conducting of various employee engagement activities in regular intervals.

### 4. Description:

The Oxford Dictionary defines labor welfare as "efforts to make life worth living for worker" Chamber's Dictionary defines welfare as "a state of faring or doing well; freedom from calamity, enjoyment of health, prosperity.

Labor welfare schemes have been classified into two specific categories, namely,

- Statutory
- Voluntary

It is statutory when such activities have to be undertaken in furtherance of the legislation adopted by the government. It is voluntary when the activities are undertaken at their own accord by the employers or some philanthropic bodies or when a labor organization undertakes such activities for the welfare of their members.



(A) STATUTORY WELFARE SERVICES: -

The Employer is legally bound to adopt welfare measures as per The Factories Act, 1948. Following are the provisions to be looked into as per the Chapter V (WELFARE) of The Factories Act.

Section 42 to 50 deal with welfare provisions, the welfare amenities are:

- Washing facilities (Section 42)
- Storing and drying facilities (Section 43)
- Sitting facilities (Section 44)
- First-aid appliances (Section 45)
- Canteens (Section 46)
- Shelters, rest-rooms and lunch rooms (Section 47)
- Crèches (Section 48)
- Welfare Officers (Section 49)
  
- **Washing facilities:**  
Adequate and suitable facilities for washing shall be provided and maintained for the use of the workers therein; Separate and adequately screened facilities shall be provided for the use of male and female workers; such facilities shall be conveniently accessible and shall be kept clean
- **Storing and drying clothes:**  
To provide provisions therein of suitable places for keeping clothing not worn during working hours and the drying of wet clothing.
- **Sitting facilities:**  
Suitable arrangements for sitting shall be provided and maintained for all the workers obliged to work in a standing position, in order that they may take rest in the course of their work, whenever necessary.
  
- **First aid appliances:**  
Readily accessible first-aid boxes or cupboards, equipped with the prescribed contents shall be provided and maintained in every factory and such box shall not be less than one for every one hundred and fifty workers ordinarily employed.
- **Canteens:**  
Every factory employing 250 workers or more shall be provided with a canteen or canteens and maintained by the occupier for the use of the workers.
  
- **Shelters, rest rooms and lunch rooms:**  
Every factory employing 150 or more workers shall have a lunch room & rest room at approved standard.
- **Creches:**  
Every factory wherein more than 30 women workers are ordinarily employed there shall be provided and maintained a suitable room or rooms for the use of children, under the age of 6 years of such women.
- **Welfare Officers:**  
In every factory wherein 500 or more workers are ordinarily employed, the occupier shall employ in the factory one Labour Welfare Officer.  
**In relation to our company, almost all the statutory compliances have been met. Added, the following are the non-statutory/ voluntary followed by our company.**



**(B) NON-STATUTORY (VOLUNTARY) WELFARE SERVICES:-**

Under this category, the activities could be broadly be categorised as mentioned below:-

- **Accommodation:**  
The employees who hail from distant locations and for whom the travelling has been an issue, such employees are provided with dormitory facility inside the factory premises, free of cost. Also, food is provided during the mornings and nights.
- **Transportation:**  
All the employees' who are not availing the dormitory facility and are from nearby villages are provided transportation to their villages.
- **Recreation:**  
The employees who reside in the dormitories are also provided with recreation room wherein the various gym apparatus as well as indoor games are arranged for.

**The above mentioned are the various voluntary welfare schemes already provided by the Management for the welfare of Employees. The proposed welfare services in addition to the above said are as follows:-**

- **Birthday Bash:** The employees, whose birthday fall under the particular month could be greeted on the same day by HR department in the form of sending E-Greeting Card, Put the greeting card in the Notice Board or go to the department and say greetings in-front of all employees. Arrange get together in the same department for 10 minutes and greet the employee.
- **“Know your Peer” -New joinee Intro:** All the new joinees in any given week could be introduced to the rest during training programmes, or any other gatherings. It is proposed to have a brief mail of their hobbies, previous experience and qualification which could be sent on a weekly basis.
- **Entertainment facilities:** Conducting dance programs, dramatics, music, role plays and fun filled games not taking more than an hour's time can energize the workers. A well designed proposal could be possibly to organize such events during Independence Day, Republic day, National Safety day etc. To start with, if an informal event could be organized in the New Year, it would really be a kick-start to the entertainment programs under the welfare scheme.
- **Family gets- together:** Invite all employees and their families to the Company on any weekly off day, Festival Holiday times. The programme schedule will be
  - Invitation to all employees and their families consisting of wife / Husband and children to the company on prescribed date
  - Opening Speech
  - Formal introduction of family members
  - Company tour
  - Lunch to all members
  - Closing meeting



- **Movie Show:** Arrange mini movie related to Science/ Friction/ Entertainment films weekly once in the Auditorium (hall no 1) in Knowledge centre. All the employees who are residing inside the dormitories will be allowed for this. Based on the response we can extend to the outside employees and families in future.
- **Outdoor and Indoor Activities:** For those with a desire for something more active, there are outdoor games, athletics; physical exercises and indoor games. The talented and the interested are to be identified and conducting the game with defined rules during the week offs / after working hours, would serve to be exciting and rejuvenating factor for the employees.

The games proposed would be Basketball, Volley ball, Table tennis, Shuttle Etc

Initially to start with, such games could be conducted on the last week off of any given month. It is also proposed that certain titles/awards could be allotted to the winners.

- **Employee of the month:** Based on the monthly performance ratings and recommendations from the HOS and HODs, the staff could be recognised for their performance and could be given titles such as “Performer of the month”, “employee of the month” etc and such employees with consistent performance could be given small gifts during the family gathering.

#### 5. Advantages:

- i) Higher employee satisfaction
- ii) Higher productivity
- iii) Low attrition
- iv) Higher scope for innovation
- v) Less stress and burnout
- vi) Higher loyalty
- vii) Higher quality
- viii) Strong bonding

Sign .....H Salim..... Date ..... 01/07/2023.....

**Review Date:** 01/07/2024



## Data Protection, Information Governance & Privacy Policy

WSG Ltd is committed to protecting and respecting your privacy.

This Policy has been written in for compliance with the General Data Protection Regulation (GDPR) and to explain when and why we collect personal information about people who are employees or our clients or potential clients, how the Company uses it, the conditions under which we may disclose it to others and how we keep it secure. We are registered with the Information Commissioners Office (ICO) and our Registration No. is.

We may change this Policy from time to time so please check that you have the current version. If you are using our website, you're agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to [accounts@west-mid.com](mailto:accounts@west-mid.com) or by writing to Kings Court, 17 School Road, Hall Green, Birmingham B28 8JG.

### Who are we?

[www.west-mid.com](http://www.west-mid.com)

### How do we collect information from you?

We obtain information about our:

- a) employees when they initially apply for positions in the Company and
- b) Clients when they make and initial enquiry for our services and ongoing through the term of the contract services provided.

### What type of information is collected from you?

The personal information we collect is usually limited to name, address, [accounts@west-mid.com](mailto:accounts@west-mid.com) In relation to our clients, this may also include keyholders for the systems.

### How is this information used?

We may use this information to:

- process an application for employment (including those required for pre-employment checks current at the time of application) and ongoing through employment for such as pensions, personal taxation and the like;
- process enquiries and orders from our clients;
- to carry out our obligations arising from any contracts entered into;
- dealing with system users and keyholders in relation to installed and maintained systems;
- seeking views or comments on the services we provide;
- notification of changes to our services;
- Sending of information which has been requested and that may be of interest. This may include information about terms and conditions, system installations, maintenance & monitoring and the like.
- For the purposes of pre-employment checks (BS7858:2019).

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory or regulatory obligations (for



example Security Screening Records are retained for term of employment plus 7 years, captured CCTV images 31 days unless required to be held for evidential evidence). We will hold your personal information on our systems for as long as is necessary for the relevant activity or as long as is set out in any relevant contract agreement.

#### **Who has access to your information?**

We will not sell or impart client information to any third parties other than the emergency services or third party alarm receiving centres or in the case of employees for pensions, personal taxation and the like. **Legal disclosures.** We may, in appropriate cases, voluntarily or where required by law, pass your data to the Police and similar organisations such as law enforcement agencies (including fraud prevention and detection) or other governmental agencies.

We will never share information with third parties for marketing purposes.

#### **Individual responsibilities**

Individuals are responsible for helping the organisation keep their personal data up to date. Individuals should let the organisation know if data provided to the organisation changes, for example if an individual moves house or changes his/her bank details.

Individuals may have access to the personal data of other individuals and of our customers and clients in the course of their employment, contract, volunteer period, internship or apprenticeship. Where this is the case, the organisation relies on individuals to help meet its data protection obligations to staff [and to customers and clients].

Individuals who have access to personal data are required:

- to access only data that they have authority to access and only for authorised purposes;
- not to disclose data except to individuals (whether inside or outside the organisation) who have appropriate authorisation;
- to keep data secure (for example by complying with rules on access to premises, computer access, including password protection, and secure file storage and destruction);
- not to remove personal data, or devices containing or that can be used to access personal data, from the organisation's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device;
- not to store personal data on local drives or on personal devices that are used for work purposes; and
- To report data breaches of which they become aware to [name of individual/the data protection officer] immediately.

Failing to observe these requirements may amount to a disciplinary offence, which will be dealt with under the organisation's disciplinary procedure. Significant or deliberate breaches of this policy, such as accessing employee or



customer data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to dismissal without notice.

**Third Party Service Providers working on our behalf:** We may pass information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services on our behalf (for example for Vetting & Screening purposes). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep all information secure and not to use it for their own direct marketing purposes. Please be reassured that we will never release any information to third parties beyond the emergency services or approved sub-contractors for them to use for their own direct marketing purposes in any circumstance unless we are required to do so by law, for example, by a court order or for the purposes of prosecution or prevention of crime.

**Third Party Product Providers we work in association with:** Due to the nature of our business, we work closely with the emergency services. The emergency services will only use such details to provide information and carry out their obligations arising from any contract entered into with us. However, we take steps to ensure that everyone's privacy rights continue to be protected.

#### **Your choices**

You will always have a choice about whether or not you wish to receive information from us. However, the Company does not undertake any direct marketing. We will not contact you for marketing purposes by email, phone or text. Should this change then this Policy will be updated to reflect this change.

#### **How you can access and update your information**

The accuracy of your information is important to us. If you change email address, or any of the other information we hold is inaccurate or out of date, please email us at [accounts@westmid.com](mailto:accounts@westmid.com)

You have the right to ask for a copy of the information the Company holds about you (we may charge £10 for information requests to cover our costs in providing you with details of the information we hold about you).

In certain circumstances, such as where the data is no longer necessary for the purposes for which it was collected, you have a right to require us to erase all personal data held about you.

**Note: There are a number of exemptions to this right, for example in relation to freedom of expression and compliance with legal obligations.**

#### **Security precautions in place to protect the loss, misuse or alteration of your information**

When you give us personal information, we take steps to ensure that it's kept securely.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our IT Systems (soft copy information) or held securely in our offices (hard copy information).



**System users.** Where we have given you a password or passcode for identifying you as an authorised system user, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

#### **Profiling**

We do not analyse your personal information to create a profile of your usage or any other such as interests and preferences so that we can contact you with information relevant to you.

We may make use of the information about you in order to provide you with information that directly affects you or in the case of system users, their system.

#### **Use of 'cookies'**

Unlike many other websites, the Company website does not use cookies. Should this change then this Policy will be updated to reflect this change.

#### **Links to other websites**

Our website may contain links to other websites run by other organisations. However, these are limited to our Certifications/Accreditations namely, SSAIB, and the like. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access these using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

#### **18 or Under**

We are concerned to protect the privacy of children aged 18 or under (although under the GDPR this is currently the under 16's). If you are aged 18 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

#### **Transferring your information outside of Europe**

As part of any application for employment or the services offered to you, the information which you provide to us may be transferred to countries outside the European Union ("EU").

These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you access our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

#### **Website recording**

At the time of publication of this Policy, our web site does not use the any web site recording service. Should this change then this Policy will be updated to reflect this change.



### **You're Rights under Data Protection Legislation**

You have various rights under data protection legislation:

- (a) Your right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.
- (b) You're right to correct any errors in the information we hold about you, and to change and correct any details you have already given us. Please inform us about any changes to your details so that we can keep our records accurate and up to date.
- (c) You're right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by emailing us at: [accounts@west-mid.com](mailto:accounts@west-mid.com)

### **Training**

The organisation will provide training to all individuals about their data protection responsibilities as part of the induction process and at regular intervals thereafter.

Individuals whose roles require regular access to personal data, or who are responsible for implementing this policy or responding to subject access requests under this policy, will receive additional training to help them understand their duties and how to comply with them

### **Review of this Policy**

We keep this Policy under regular review. This Policy was last updated as per the date below.

The spoke for the company is **H Salim**

Sign .....H Salim.....Date .....01/07/2023.....

Review Date: 01/07/2024



## **COMPANY VEHICLE POLICY:**

These principles and guidelines apply to all WSG LTD employees who are provided with a Company Car, supplied by the Company. Please read all the instruction and sign at the end.

### **A) DRIVING LICENCE AND AUTHORITY TO DRIVE COMPANY VEHICLES**

1. You must be in possession of a current driving license and have a Director's authority to drive one of our vehicles.
2. Your driving license must be produced for scrutiny by a Director prior to driving any of our vehicles.
3. If at any time your license is endorsed, or you are disqualified from driving, we must be informed immediately.
4. It is your responsibility to see that the car is not used by anyone other than authorized employees. Special written permission must be obtained from the Director for the vehicle to be used by any other person.

### **B) FIXTURES, FITTINGS AND MODIFICATIONS**

1. No fixtures such as aerials, roof racks, towing apparatus, stickers, may be attached to the vehicle without prior written permission. When handing the vehicle back to us such attachments must remain unless adequate rectification work is carried out professionally to restore the vehicle to its former condition.
2. No change or alterations may be made to the manufacturer's mechanical or structural specification for the vehicle.
3. Failure to adequately clean the vehicle, you may be subject to the cost of the Valet deducted from your wage.

### **C) WARRANTY**

All warranty work must be reported to us prior to it being carried out.

### **D) CLEANING AND MAINTENANCE**

1. As the vehicle has been allocated to you, it is your responsibility to keep it clean, and to ensure that the vehicle is regularly serviced in accordance with the requirements laid down by the manufacturer, and as specified in the maintenance book of the particular model of vehicle.



2. Any other maintenance or repair work or replacement of parts, including tyres, must be approved in advance by us.

**E) FUEL ETC.**

1. In addition to keeping the vehicle regularly serviced, it is your responsibility to see that the oil and water levels, battery and brake fluid and tyre pressures are maintained and that the tread of all tyres conforms to the minimum legal requirements.
2. Unless contrary arrangements exist in writing between us, we will only reimburse you for fuel and oil used on our business. Claims must be submitted on a weekly report sheet, signed by yourself and accompanied by receipted bills where the vehicle cannot be filled up on our fuel account.

**F) FINES**

We cannot under any circumstances accept responsibility for parking or other fines incurred by you. The cost of these fines if not paid may be deducted from salary/pay.

**G) DAMAGE OR INJURY**

1. If you are involved in an accident which causes damage to property or another vehicle, or injury to any person or animal, you are required to give your name and address, the name and address of the vehicle owner, the registration number of the vehicle and the name of the insurance company to any person having reasonable grounds for requiring such information. IT IS IMPORTANT THAT YOU GIVE NO FURTHER INFORMATION. If for some reason it is not possible to give this information at the time of the accident, the matter must be reported to the office and where necessary the police as soon as possible, but WITHIN TWENTY FOUR HOURS OF THE OCCURRENCE.
2. In addition, in the case of an incident involving injury to another person or to notifiable animals, you are responsible for notifying the police of the occurrence and you must produce your insurance certificate to a police officer attending the accident, or to any other person having reasonable grounds for seeing it. The accident must be reported to a police station or to a police officer WITHIN TWENTY FOUR HOURS. If you are not then able to produce the certificate you must in any event produce it in person within five days after the accident to such police station as you may specify at the time of first reporting the accident.
3. For security reasons, insurance certificates are kept by us. However, a copy of the certificate of insurance is provided with each vehicle and this will be renewed annually. You should make sure that it is with the vehicle at all times. Replacement copies can be obtained from us if necessary.

**H) LOSS**



1. In the case of theft of the vehicle, we and the police must be informed immediately. Full details of the contents of the vehicle must also be given. If any contents are stolen from the vehicle, we and the police should be notified immediately.
2. Please note that only our property is insured by us and you should make your own arrangements to cover personal effects.
3. The vehicle should be kept locked when not in use and the contents should be stored out of sight, preferably in the boot or rear. If a vehicle is stolen we are required to prove to the insurance company that there has been no negligence and, therefore, we must hold you responsible in the event of such negligence.

#### **I) ACCIDENT PROCEDURE**

1. It is a condition of the insurance policy that the insurers are notified of all accidents, even if apparently of no consequence. You must, therefore, as soon as possible after the accident obtain an accident report form from us which must be completed and returned to us within twenty four hours. All the information required on the form must be completed. You should note that whenever possible the following particulars should appear in the form:-
  - a. the name and address of the other driver and the name and address of his/her insurers
  - b. the names and addresses of all passengers in both our vehicle and the other vehicle
  - c. names and addresses of all witnesses. It will be of considerable assistance if statements can be obtained from all witnesses at the time of the accident
  - d. particulars of the police attending i.e. name, number and division.
2. A detailed sketch must be provided showing the relative position of the vehicle before and after the accident, together with details of the roads in the vicinity, e.g. whether they are major or minor roads and as many relevant measurements as possible.
3. If our vehicle is not in a drivable condition, you are responsible for making adequate arrangements for the vehicle to be towed to a garage but must inform the office before doing so, and the name and address of the garage where the vehicle may be inspected must be stated on the claim form.
4. An estimate of the repairs required to be carried out, showing details and cost of both labor and materials, must be obtained and sent to us as soon as possible.
5. Under no circumstances may repairs be put in hand until the insurance company has given its agreement. We will notify you when this has been done.
6. You should not under any circumstances express any opinion one way or the other on the degree of responsibility for the accident. Only exchange particulars mentioned in 1) above and nothing more.



**J) ROAD FUND LICENCE**

The road fund license for the vehicle will be renewed automatically when due, but in the event that you do not receive the new license by the expiry date, we should be notified immediately.

**K) TRAVEL OVERSEAS**

1. Our vehicles may not be taken out of the country without written permission from a Designated Person.
2. Our insurance policy covers the use of the vehicle in Great Britain. Before travelling with the vehicle anywhere else you must obtain our permission and, at least seven days beforehand, give us a list of the countries to be visited and the relevant dates. A letter of authorization will be issued which must accompany the vehicle and a Green Card may be necessary. On return to the United Kingdom, these should be returned to us for cancellation.
3. Unless the journey is on approved business, the cost of any Green Card may be charged to you and must be paid for before the journey starts.

**L) PERMITTED USE**

Subject to the restrictions already stipulated, our vehicles may only be used for social, domestic and pleasure purposes, and for our business, excluding the carriage of passengers for hire or reward. Our vehicles may not be used for any type of motoring sport, including racing, rallying or pace making, whether on the public highway or on private land. Private mileage must be shown and declared.

**M) PERSONAL LIABILITY FOR DAMAGE TO VEHICLES**

1. Where any damage to one of our vehicles is due to your negligence or lack of care, we reserve the right to insist on your rectifying the damage at your own expense or paying the excess part of any claim on the insurers.
2. Repeated instances may result in the use of the vehicle being withdrawn and disciplinary action being taken.

If you have any concern or need any further information, please do not hesitate to contact us.

Name: -----

Signature: -----

Date: -----



## **1. Policy Statement**

The purpose of this Policy is to describe the service standards to be applied and the operational procedures to be followed by all employees of the WSG Ltd when using mobile telephones for company and personal use

## **2. Introduction**

- 2.1 This policy provides guidance on when to use telephones, making and responding to calls in a way that reflects positively on both the individual employee and the Company.
- 2.2 The company recognizes that the access to a mobile phone is necessary for certain roles. The advantage of mobile phones to lone workers and those working in remote areas is recognized. Where there is a business need, mobile phones are provided for business use, and this Mobile Phone Usage Policy includes guidance on how they should be used and managed.

## **3. Responsibilities**

- 3.1 Employees are responsible for all calls made on a WSG Ltd mobile phone, and for the safekeeping of the phone.
- 3.2 Users are responsible for any fine or other penalty incurred for breach of legislation if using a mobile phone or "hands free" device whilst driving.

It is illegal to make or receive a call using a mobile telephone whilst driving if the phone is held in the hand during any part of the operation. Users should also be aware that they could be prosecuted for not using "hands free" devices.

- 3.3 Company provided mobile phones will remain the property of the WSG Ltd and must be returned if the user leaves the employment. Failure to do so may result in the



employee being charged an amount equivalent to the cost of the phone and any other charges made against the phone account. The WSG Ltd may also apply an administrative charge to cover costs incurred in recovering the phone and terminating the contract.

3.4 If a WSG Ltd mobile phone is lost it must be reported to a line manager and office manager as soon as possible. If a WSG Ltd mobile phone with work emails synchronized to the device it must be informed to office manager for the password reset.

3.5 If the mobile phone is lost by a user, that user may be required to purchase replacement handset by themselves, if this loss is due negligence on the part of the user.

3.6 Mobile phones are provided for WSG use only. While the company recognizes that occasional personal use may be necessary, this should be kept to a minimum. Apps should not be purchased for personal use at the WSG Ltd expense and may not be replaced or refunded if bought from personal funds and downloaded to a WSG Ltd handset.

#### **4. Breach of Policy**

4.1 All employees are responsible for their compliance with the Policy, and for reporting any policy violation or other abuse of the mobile/telephone system. Any breach of this Policy will be dealt with in accordance with the WSG Ltd disciplinary procedure. If abuse of a mobile phone is suspected, in addition to any other sanctions imposed all the cost occurred will be recovered from the employee.

#### **5. Service Standards: Making Calls**



- 5.1 The use of chargeable mobile services such as premium rate text messages, directory enquiries etc., is not permitted on WSG Ltd provided mobile phones without prior and specific written permission from a line manager.
- 5.2 Text or picture messages (SMS or MMS) must not contain, or have attachments that contain: defamatory, offensive or harassing language, fraudulent material, sexually explicit images or language, material that infringes copyright or other intellectual property rights of third parties, or offensive cartoons or jokes or otherwise involve lawful or wrongful conduct. Nor should they contain any remarks that might be potentially embarrassing to the WSG Ltd, its employees or the general public.

## **6. Confidential Data and Information Security**

- 6.1 Information must never be given out over the phone unless it is absolutely clear who it is being given to and that they are entitled to the information and are ready and able to accept it. All information forwarded must adhere DPA2018.
- 6.2 Care must be taken to ensure that conversations involving confidential and/ or personal information cannot be overheard.
- 6.3 Voicemail messages containing personal information should only be left after due consideration has been given to any security and confidentiality risks involved.
- 6.4 Mobile phones must be kept secure at all times, and out-of-sight whenever possible.
- 6.5 All WSG Ltd and personal smartphones setup with WSG Ltd email accounts and data must be protected with four-digit passcode. This is to protect your information and WSG Ltd data. After enabling passcode on your device, each time you turn on or wake up the device, it will prompt for the passcode before you can access applications or information on the device.



6.6 Mobile phones may not be used to store and/or transmit personal data for which the WSG Ltd is the Data Controller or any other sensitive data relating to the WSG Ltd and its activities.

**Employees Acknowledgement**

I have read this policy and confirm that I understand my responsibilities and company rules. I further confirms that at all times I will adhere to all the contents of this document as stated above. In addition, I will always follow DPA2018 in processing and forwarding any information using company provided mobile phone.

Name: .....

Signature: .....

Date: .....



## **Tax Evasion Code of Conduct Policy**

### **Summary**

This code of conduct summarises the procedures of WSG LTD and its subsidiaries to ensure all WSG LTD associated persons, including employees and those acting on our behalf, do not facilitate tax evasion.

### **Statement**

Tax evasion, tax fraud and attempts to facilitate such actions are antithetical to the ethos of WSG LTD. These crimes cheat the government out of revenue it needs to create the conditions for our business to flourish. It amounts to little more than stealing from our customers and from ourselves. WSG LTD is committed to no tolerance for tax evasion, and we are committed to a dedicated programme to counter the risk of any employee, contractor, business partner or representative of our company engaging in the criminal facilitation of tax evasion.

We expect everyone who works with our company to fully comply with their tax obligations. We will not tolerate, permit or allow any person associated with us to engage in the facilitation of tax evasion or tax fraud by any of our customers, suppliers, business partners, contractors or employees anywhere in the world.

WSG LTD is committed to complying in full of the tax laws everywhere we operate, and we choose to do this by respecting not only the letter of the law, but the spirit of the underlying tax policy intent. We aim to pay the right amount of tax at the right time, on all the eligible profits we make.

### **Accountability & Governance**

The Director of our company has approved this policy and our commitment to no tolerance of tax evasion or its facilitation. This director is responsible for monitoring compliance with this policy.

### **Employee responsibilities**



## **Tax Evasion Code of Conduct Policy**

Our code of conduct sets the standards of behaviour we expect all employees to adhere to. Our employees have a responsibility to take reasonable action to prevent harm to WSG LTD and we hold our employees accountable for their actions and omissions. Any actions that breach the Criminal Finances Act and the tax laws of wherever we operate brings harm to WSG LTD and will not be tolerated.

You are responsible for properly following WSG LTD policies and procedures. These should generally ensure that all taxes are properly paid. If you are ever asked by anyone either inside or outside our company to go outside our standard procedures, this should be reported without delay, as someone may be attempting to evade tax.

Any employee who has any concerns relating to any potential breach of this policy must immediately follow our whistleblowing policy and report the matter without delay.

### **Training & Communication**

All employees must familiarise themselves with our prevention of tax evasion training and ensure they have the appropriate level of knowledge for their specific roles. All employees must take into account tax evasion-focused communications from senior management and be aware of the latest internal information regarding prevention of tax evasion.

#### **High risk areas for our business include:**

- Accounts payable
- Accounts receivable
- Payment to contractors



## **Tax Evasion Code of Conduct Policy**

### **Accounts Payable**

- Only contract with businesses which have good reputations.
- Ensure all information on an invoice is correct and as expected.
- Have the full contact details of the supplier and ensure it matches to where the payment is being made.
- Specify in contacts that VAT and other sales taxes must be added to invoices and have written reasons why such added taxes are not required.

### **Accounts Receivable**

- Ensure correct procedures are followed.
- Do not process off-system invoices.
- Ensure all invoices have the correct VAT coding.

### **Contractors**

- Where tax is required to be deducted at the source this must be done.
- Payments to contractors should only be made in strict accordance with company policies.
- Any tax related withholdings must be deducted and recorded.
- Payments without deductions should only be made if there is a reasonable expectation that the recipient will meet their tax obligations.

### **Our commitment**

- WSG LTD is committed to the following principles:
- Our business is carried out fairly, honestly, and openly in every part of our work.
- Our values inform everything we do.
- We will never sell any product or service where we know or suspect that any aspect of the transaction is being misused, abused or otherwise corrupted for the purposes of tax evasion.



## Tax Evasion Code of Conduct Policy

- We will never buy any product or service from any supplier where it is known or suspected that any aspect of the transaction is being misused, abused or otherwise corrupted for the purposes of tax evasion.
- We will immediately terminate any agreement or business relationship as soon as our company learns of or suspect's tax evasion may be taking place.
- We will not progress any business opportunity where there is any suspicion that any aspect of it may involve tax evasion.
- We will not do business with others who do not also hold to at least the same standard of preventing tax evasion.
- Our company will regularly monitor and review this policy.
- Any employee found in breach of this policy will be subject to disciplinary action.
- We will not tolerate any contractor, business partner, representative or other third party associated with us failing to uphold this policy.
- No employee will suffer demotion, penalty, or any other adverse action for reporting any breach of this policy or from refusing to carry out an action which may lead to a breach of this policy.

Name: .....

Signature: .....

Date: .....



## Corporate Criminal Offence Policy

### Purpose

The purpose of this policy is to communicate the group's approach to the Corporate Criminal Offence of the Failure to Prevent the Criminal Facilitation of Tax Evasion ("CCO")

A criminal offence is committed under this legislation where an associated person of WSG LTD (such as an employee, contractor or agent) deliberately and dishonestly facilitates a taxpayer evading tax, and

WSG LTD has not put in place reasonable preventative procedures.

### Key Principles

WSG LTD will ensure we have reasonable prevention procedures in place to prevent any person associated with WSG LTD from facilitating tax evasion. Our key procedures comprise of obtaining assurances and warranties from suppliers that they have reasonable prevention procedures in place.

### Taking our Responsibilities Seriously

WSG LTD is committed to responsible supply chain management and our objective is to comply with all applicable laws and regulations and strives for best practice with regard to responsible supply chain management. We also expect our suppliers and contractors and their directors, officers, employees and representatives to conduct all business activities in full compliance with all applicable laws and regulations.

Any supplier or contractor invited to submit a tender and provide services to WSG LTD is done so based on this policy and the principles that suppliers or contractors we appoint do not engage or facilitate the criminal act of tax evasion.

### Who is covered by the policy?

This Corporate Criminal Offence policy applies not only to Prime Security Services Limited's own employees but also to suppliers, sub-contractors and other business partners.

### Implementation and Monitoring

WSG LTD is committed to having a clear and transparent company policy which is reviewed regularly and sets out the steps being taken to prevent the Criminal Facilitation of Tax Evasion ("CCO")

### Reporting of any misconduct

If any employee or anyone working for WSG LTD has any reason to believe that criminal activity of any form may exist within our organization or our supply chain or may occur in the future or have any concerns or suspicions relating to compliance with this policy, they must bring this to the attention of the directors.



## Corporate Criminal Offence Policy

### Responsibility for the Policy

The WSG LTD UK directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it

Name: .....

Signature: .....

Date: .....



## PROCUREMENT OF GOODS AND SERVICE POLICY

Purpose  
Scope  
Definitions  
*Policy Statement*  
Responsibility  
Legislative Context  
Associated Documents  
Implementation

### **Purpose**

This Policy establishes the directions that must be implemented relating to the procurement of goods and services by the WSG Ltd. WSG Ltd is required to implement and maintain an effective internal control framework over procurement activities.

### **Scope**

This Policy applies to all staff, at all WSG Ltd locations, who are involved in the administration or management of WSG Ltd funds.

### **Definitions**

<b>Financial Records:</b>	WSG Ltd subsidiary ledgers as maintained by the Financial Operations Unit.
<b>Procurement:</b>	Process of acquiring goods or services on behalf of the WSG Ltd
<b>Probity:</b>	Evidence of ethical behaviour in a particular process.
<b>Delegated Authorities:</b>	Financial delegation in accordance with the Delegations - Contract, Financial, Staffing and Tender Policy.
<b>WSG Ltd Funds:</b>	Any funds held in any WSG Ltd account, regardless of the funding source.

### **Policy Statement**

Effective internal control procedures must be implemented and maintained by the WSG Ltd to ensure all procurement activities of the WSG Ltd are authorised in accordance with the delegated authorities and business requirements and within a documented procurement framework. The WSG Ltd must ensure the following procurement principles are adhered to:



- Value for Money.
- Open and Fair Competition.
- Accountability.
- Risk Management.
- Probity and Transparency.
- Innovation.
- Customer Service.

The WSG Ltd QMS is to be referred to when procuring goods or services on major projects that are of high value, high profile or possibly contentious.

### **Responsibility**

The Operations Director and Finance Director is responsible for ensuring this Policy is adhered to in respect to all procurement of goods and services made by the WSG Ltd.

### **Legislative Context**

- Please refer to job induction training

### **Associated Documents**

- Purchase Order Form
- Purchase Order Log

### **Implementation**

The Procurement of Goods and Services Policy will be implemented throughout the WSG Ltd via:

- Within the company newsletter

Email to all employee's

**Signed:** H. Salim

**Position:** Director

**Date:** 01/07/2023



## WSG Ltd Ethics Policy

### Purpose

This policy has been created to provide a framework and guidance on the company's approach to achieving and maintaining good business behavior by means of sound ethical conduct. It serves to ensure that all employees are aware of their individual and collective responsibilities with regards to the company's ethics, and to emphasize our employees' and customers' expectations to being treated fairly and in accordance with good business practices.

All employees are responsible for reading this document in its entirety and for ensuring that they comply with all the policy requirements as stated within this document.

The purpose of this ethics policy is to maintain a culture of openness, trust and integrity in the company's business practices. Effective ethics is a 'team effort' involving the participation and support of every WSG Ltd employee.

WSG Ltd is committed to protecting employees, business partners and suppliers from illegal or damaging actions by individuals, either knowingly, or unknowingly. When WSG Ltd addresses issues proactively and uses correct judgement, it will help to set the company apart from its competitors and help further enhance its reputation.

WSG Ltd will not tolerate any wrongdoing or impropriety at any time. The company will take the appropriate measures and act quickly where the 'ethical code' is broken.

### Scope

This policy applies to all employees, contractors, consultants and part time employees of WSG Ltd<sup>1</sup>.

### Policy

WSG Ltd Board's commitment to Ethics:

- that Integrity is one of the company's core values
- to set and lead by example. In any business practice, honesty and integrity are of the highest importance
- to have an open door policy and welcome suggestions and concerns from all employees. This creates an environment that will allow employees to feel comfortable discussing any issues and will serve to alert Directors to concerns within the company

#### Employee's commitment to Ethics:

- to disclose any conflicts of interests regarding their position with the company
- to engage in carrying out the company's mission in a professional manner and in line with the core values of the company which includes integrity.

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<sup>1</sup> This is linked to the WSG Ltd policy on Business Conduct Principles for Suppliers and Partners

- to recognize that the main function of the company is at all times to serve the best interests of its current and future customers, and to do this with respect, concern, courtesy and responsiveness
- to treat everyone fairly, have mutual respect, promote a team environment and avoid the intent and appearance of unethical or compromising practices
- to treat all persons with respect and consideration, regardless of race, religion, gender, sexual orientation, maternity, marital or family status, disability, age or national origin
- to respect the structure and responsibilities of management, provide them with facts and advice as a basis for decision and policy making, and uphold and implement decisions and policies adopted by management
- to demonstrate the highest standards of personal integrity, truthfulness and honesty in all activities in order to inspire confidence and trust in such activities, both internally and externally
- to strive for personal and professional excellence, encourage the professional development of others and keep up to date on emerging issues affecting the Company
- to conduct themselves at all times with professional competence, fairness and impartiality

#### Company's commitment to Ethics

- to hold paramount the safety, health and welfare of the public in the performance of the company's professional duties
- to keep the local communities informed about issues which may affect them
- to collaborate with and support partners in carrying out the company's mission and in line with the company's ethics policy
- to build professional reputations on the merit of our capabilities and refrain from competing unfairly with others
- not to engage in any business practice or process or with any entity, including potential customers, that does not match the Company's ethical standards

### **Governance and Review**

Should an employee be in any doubt about a relevant course of action, require clarification on a particular issue, or want to report a potential breach of WSG Ltd ethical code, they should report directly to their line manager/Director. The topic/issue will then be dealt with as quickly and efficiently as possible, and by the Managing Director if appropriate.