



Business Ethics Policy

Comet Security Services Ltd. believes maintaining high ethical standards for itself and its employees is essential to preserving its reputation in the marketplace.

Good ethics are essential to ensure that Comet Security Services Ltd. meets its objectives fairly and equitably and its broader social responsibilities externally. In addition, Comet Security Services Ltd. is committed to providing high ethical standards within the workplace.

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

We will ensure that Comet Security Services Ltd. meets its aims regarding social impact and ethical behaviour and that its stakeholders perceive it positively.

1. Procedure

- All employees will receive ethics training as part of the induction Programme. As the ethics policy and procedure develop, management will cascade ongoing ethics training to employees.
- All employees are required to adhere to the Comet Security Services Ltd policy and procedure on business ethics. Employees who breach Comet Security Services Ltd's policy on business ethics will be subject to disciplinary action up to and including dismissal.
- 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.
- Comet Security Services Ltd. has a Code of Conduct that employees are expected to abide by. A copy of the Code of Conduct and other policies relevant to this procedure are available in the Staff Handbook.
- The following areas are included in this procedure. However, this list is not exhaustive and will be developed as required.
 - Data protection/Access to employee data.
 - Whistleblowing.
 - The giving and receiving of gifts.
 - Confidentiality.
 - Relationships with competitors, suppliers, advertisers, etc.
 - Equal opportunities, discrimination and harassment.
 - Moonlighting.
 - The environment.
- Comet Security Services Ltd adhere to the principles relating to the Processing of Personal Data set out in the GDPR, which require Personal Data to be:
 - Process personal data relatively, lawfully and transparently.
 - Obtain personal data only for one or more specified and lawful purposes and ensure that such data is not processed in a manner incompatible with the purpose or purposes for which it was obtained.
 - Ensure that personal data is adequate, relevant and not excessive for the purposes for which it is held.
 - Ensure that personal data is accurate and, where necessary, kept up-to-date.
 - Ensure that personal data is not kept for any longer than is necessary for the purpose it was obtained.
 - Ensure that personal data is kept secure.
 - Ensure that personal data is not transferred to a country outside the European Economic Area unless the country to which it is sent ensures adequate protection for the rights (about the information) of the individuals to whom the personal data relates.



Comet Security Services Ltd. employees should understand how data protection impacts their particular role, particularly regarding external suppliers and customers. Employees with questions about Comet Security Services Ltd. 's Data Protection/Access to Employee Data policy should first speak to their manager.

- Comet Security Services Ltd encourages a free and open culture in its dealings with its officers, employees, and all people with whom it engages in business and legal relations. Comet Security Services Ltd recognises that effective and honest communication is essential if malpractice is to be effectively dealt with and Comet Security Services' success is ensured.
- Comet Security Services Ltd. does not believe giving and receiving gifts from suppliers and customers is appropriate. In certain circumstances, gifts may constitute a bribe. Regardless of its value, an employee who receives a gift from a customer or supplier must inform their manager, who will decide whether the employee may keep the gift or return it.
- A confidentiality clause forms part of all employees' statements of particulars/employment contracts. During employment, employees will have access to confidential and sensitive information. Employees must not disclose any Confidential Information from Comet Security Services Ltd. to a third party, either during or after their employment has ended. Confidential information includes information on Comet Security Services' present or potential customers or suppliers and any Comet Security Services business information, including marketing, corporate or financial plans.
- Comet Security Services Ltd recognises that work may develop friendships and closer relationships. Relationships may be created with colleagues, suppliers, and customers. It is natural for relationships to build in a working environment. While Comet Security Ltd respects the privacy of its employees, it asks all employees to consider the impact that personal relationships can have on Comet Security Services Ltd.
- Comet Security Services Ltd is committed to equality of opportunity and diversity in the workplace. It is the Comet Security Services 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, Comet Security Services Ltd will monitor the composition of the workforce and introduce positive action if it appears that this policy is not entirely effective. Employees must conduct themselves in a way that always promotes equal opportunities. Senior management will promote good practice, providing employees with relevant training. Employees who feel they have been discriminated against or suffered harassment should speak to a member of management immediately.
- Employees may seek separate employment with another employer or pursue outside business interests while remaining employed by Comet Security Ltd. Although Comet Security Services Ltd has no desire to restrict an employee's external activities unreasonably, it must seek to protect its interests and those of all its employees. Employees will not be permitted to undertake business activities or other work where Comet Security Services considers that this is incompatible with its interests and, in any event, unless employees have obtained prior written authorisation from senior management.
- Comet Security Services Ltd is committed to conserving the Earth's resources and doing what it can to reduce its adverse effects on the environment. Employees must use the Comet Security Services Ltd 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 that is not in use

Signature

Director
Position

01/01/2026
Date