



CODE OF ETHICS

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DISABILITY DISCRIMINATION

POLICY STATEMENT

Eurosafe (“the Company”) are an Equal Opportunities employer and aim to ensure that the employees achieve their full potential and that all employment decisions are taken without reference to irrelevant or discriminatory criteria. The Company wishes to ensure that no employee or applicant for employment with the Company suffers unjustifiable discrimination because of their disability. The Company will therefore follow procedures designed to provide that all employees and applicants be treated on their relative merits and abilities.

DEFINITION OF DISABILITY

Employees should be aware that under the Disability Discrimination Act 1995 a disabled person is someone who has (or had) an impairment, which substantially affects their ability to do everyday activities, over a sustained period. Progressive conditions such as multiple sclerosis, cancer, HIV / AIDS together with speech and hearing defects will amount to a disability as well as more obvious physical and mental handicaps such as paraplegia.

RECRUITMENT, TRAINING & BENEFITS

In particular, the Company will not discriminate in the recruitment of employees, terms and conditions afforded to employees, promotion, training or any other benefit afforded to employees or disciplining of employees in a way that does or may discriminate against disabled employees. Recruitment and employment decisions will be made based on objective criteria and selection procedures are reviewed from time to time to ensure that they are appropriate for achieving the Company’s obligations and for avoiding unlawful discrimination.

REASONABLE ADJUSTMENTS

The requirement of job applicants and existing members of staff who have or who have had a disability will be reviewed to ensure that wherever possible reasonable adjustments are made to enable them to enter into or remain in employment with the Company. Promotion opportunities, benefits and facilities in employment will not be unreasonably limited and every reasonable effort will be made to ensure that disabled staff participate fully in the workplace.

If employees become disabled during their employment, steps will be taken, through re-training or re-deployment if necessary, to enable employees to remain in employment with the Company whenever possible.

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GRIEVANCE PROCEDURE

Employees who believe that either they have been discriminated against, or, that a colleague has suffered discrimination should raise the matter under the Grievance Procedure. Employees are assured that any complaints will be dealt with in confidence and will be regarded with the utmost seriousness.

DISCIPLINARY ACTION

The Company regards unlawful discrimination against any employees (whether disabled or not) as a disciplinary matter but certainly any employee(s) who breach this policy will be dealt with under the Disciplinary Procedure and may be dismissed for gross misconduct.

AGE DISCRIMINATION

POLICY STATEMENT

Eurosafe (“the Company”) have a policy of employing people of all ages and do not discriminate against a person because of how old or young they are.

RECRUITMENT

The Company recruits employees based on their skills, qualifications, ability, and potential to work well within the workplace. The Company’s decision to recruit shall not be based on the applicant’s age unless there is a genuine occupational requirement for a person in a particular age group to fulfil that particular position.

TRAINING

The Company encourages all employees to undertake ongoing training applicable to their specific jobs.

RETIREMENT

The Company has no fixed retirement age although; this will be reviewed from time to time by the Board of Directors to reflect the Company’s business needs. The Company acknowledges that retirement is a matter of choice for individuals and will not pressurise employees into resigning because they have reached or are approaching a certain age.

Employees are free to retire whenever they choose or to seek alternative roles or working patterns. For further information, see the Company’s Flexible Working Policy.

The Company is proud to employ people of all ages and consider that age diversity is beneficial to the organisation. We are committed to not discriminating against employees because of age and adhere to the principles set out in our Equal Opportunities Policy.

PURPOSE OF THE POLICY

This policy aims to create a framework for workplace discussions, enabling you to express employees’ preferences and expectations with regard to retirement and enabling the Company to plan for the Company’s business.

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This policy does not form part of your contract of employment and the Company may amend it from time to time as the Company considers appropriate.

DISCUSSING THE EMPLOYEES FUTURE PLANS

The employee or the employee's manager may want to discuss the employee's short, medium and long-term plans, as the need arises. For example, a promotion opportunity may arise, or, if the employee's circumstances change, employees may want a different working pattern or to stop work altogether. The Company need to plan for the business, and so may indicate to employees from time to time that it would be helpful to know what their plans are. There is no obligation for the Company or the employee to hold workplace discussions about the employee's future plans, but it may be mutually beneficial for the Company to do so.

The Company will not make generalised assumptions that performance will decline with age, whether due to competence or health issues. If the Company think there are problems with an employee's performance or ill-health, these will be dealt with in the usual way, through the Capability Procedure or Sickness Absence terms contained in the employee's contract of employment.

If a workplace discussion takes place for the purposes described in paragraph 6.1 above, the Company will aim to make it as informal as possible.

During any workplace discussion:

- A. The Company will not assume that an employee wants to retire just because they are approaching a certain age, such as state pension age; and
- B. The Company will not make discriminatory comments, suggesting that an employee should move on due to age.

If an employee indicates that they are thinking of retiring, then they are free to change their mind at any time until they have actually given notice to terminate your employment.

An employee's employment or promotion prospects will not be prejudiced because they have expressed an interest in retiring or changing work patterns.

If an employee expresses an interest in moving to a more flexible working pattern or changing role, the Company will confirm that this is what the employee wants before any action is taken which could affect the employee's employment, such as a change to the employee's role or responsibilities.

GIVING NOTICE OF RETIREMENT

If an employee decides to retire, the Company would appreciate as much notice as possible, although the employee should give the Company at least the notice that they are obliged to give under their contract of employment.

PROMOTION

The Company encourages promotion where applicable to all employees. Promotion is based on the employees' ability, judged in terms of:

- A. Measured performance;
- B. Demonstrated potential; and
- C. The ability to achieve the aims of the post.

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ANTI-SLAVERY POLICY

ANTI-SLAVERY STATEMENT

Eurosafe (The Company) have a zero-tolerance approach to slavery and human trafficking. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

The Company's anti-slavery policy echoes our promise to act ethically and with integrity in all our business relationships. The Company implements and enforces effective systems and controls to ensure slavery and human trafficking are not occurring anywhere in the Company's business.

The Company's supply chains, suppliers, contractors and end clients shall adhere to our values and our relationships with all suppliers, contractors and end clients. These relationships have been established over a number of years and are built upon mutually beneficial factors.

All new supply chains, suppliers, contractors and end clients shall adhere to our anti-slavery and human trafficking policy. When the company appoints new suppliers, contractors or the Company supplies services to new end clients, we shall carry out checks through the Company's due diligence process. The Company shall determine their business performance and gather all additional information to establish that are suitable.

At present, the Company have not been made aware of any human trafficking or slavery activities within our supply chain, suppliers, contractors or end clients. However, if any are brought to our attention then the Company shall act immediately in accordance with current legislation.

The Company applies a non-exhaustive due diligence process as follows:

- A. Identification and assess all potential risk areas in considering new suppliers contractors and end clients
- B. Undertake reviews on a regular basis of all existing supply chains, suppliers, contractors and end clients.
- C. Mitigate the risk of slavery and human trafficking occurring in the supply chains, with our suppliers, with contractors and end clients.
- D. Monitor all potential risk areas in our supply chains, with our suppliers, with our contractors and with our end clients..
- E. We protect all whistleblowers.

BRIBERY POLICY

POLICY STATEMENT

Eurosafe's ("the Company") policy is to conduct all of the Company's business in an honest and ethical manner. The Company takes a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all the Company's business dealings and relationships wherever the Company operates and implementing and enforcing effective systems to counter bribery.

The Company will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in the Company operates. However, the Company remain bound by the laws of the UK, including the Bribery Act 2010, in respect of the Company's conduct both at home and abroad.

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The purpose of this policy is to:

- (a) set out the Company's responsibilities, and of those working for the Company, in observing and upholding the Company's position on bribery and corruption; and
- (b) provide information and guidance to those working for the Company on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if the Company is found to have taken part in corruption then the Company could face an unlimited fine, be excluded from tendering for public contracts and face damage to the Company's reputation. The Company therefore take these legal responsibilities very seriously.

The Company have undertaken risk assessments to identify any potential risks of anticorruption and bribery. These risk assessments will be amended from time to time.

In this policy, third party means any individual or organisation that employees come into contact with during the course of their work for the Company, 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.

WHO IS COVERED BY THE POLICY?

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, homeworkers, 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 workers in this policy).

WHAT IS BRIBERY?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Offering a bribe

You offer a potential client tickets to a major sporting event, but only if they agree to do business with us. This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

Receiving a bribe

A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them. It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a foreign official

You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process, such as clearing our goods through customs].

The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for us. We may also be found to have committed an offence.

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GIFTS AND HOSPITALITY

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties

The giving or receipt of gifts is not prohibited, if the following requirements are met:

- (a) it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- (b) it complies with local law;
- (c) it is given in the Company's name, not in an employee's name;
- (d) it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- (e) it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- (f) taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- (g) it is given openly, not secretly; and
- (h) gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of a Company Director.

The Company 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.

WHAT IS ACCEPTABLE?

It is not acceptable for employees (or someone on behalf of an employee) to:

- (i) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- (j) give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- (k) accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- (l) accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- (m) a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to the Company; or
- (n) you are offered an unusually generous gift or offered lavish hospitality by a third party.

WHISTLE BLOWING POLICY

Eurosafe ("the "Company") encourages all employees to disclose their genuine concerns in relation to any criminal activity, breach of a legal obligation, malpractice, danger to health and safety and the cover up of these in the workplace. The above applies whether or not the information is confidential.

The Company is committed to ensuring that employees concerns are taken seriously and investigated promptly. All disclosures will be protected if the employee has an honest and reasonable suspicion that a genuine concern has arisen, or is likely to occur. Any employee who raises any concerns reasonably and responsibly will not be penalised in any way.

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APPLICABLE PERSONNEL

The policy is for employees of the Company. For the purpose of this policy, this is an individual who is:

- (a) employed on a permanent or fixed term contract of employment;
- (b) on a temporary contract or employed through an agency to work for the Company;
- (c) an independent consultant for the Company; or
- (d) contractors and suppliers of services to the Company.

PROCEDURE

Any individual who has a reasonable suspicion of any concern should initially raise their concerns with their manager. If the individual concerned does not feel that this is the appropriate person, they should raise their concern with a Director.

The Company appreciates that raising a concern under this procedure may be a daunting and difficult experience. Any individual may choose to be accompanied by or represented by a work colleague or trade union representative of their choice at any stage in the procedure.

The Company ensures that all incidents reported will be reasonably investigated.

The Company shall ensure that all reports are in full confidence and with only those individuals who need to know, being informed of the individual's concerns.

The Company will establish and record the basis of the concerns that have been raised and establish what further actions shall be required. The individual raising the concern will be advised of the outcome of the investigation as soon as is reasonably practicable, which shall be normally within two weeks of the date of the disclosure. However, where a longer period is needed for investigation, the individual shall be informed in writing.

If an individual is not satisfied with the response received and any subsequent action taken, they should put their concerns in writing to a Director who will arrange any further investigation as they think appropriate. The Director will send a written response to the individual concerned.

GUIDING PRINCIPLES

To ensure that this policy is adhered to, and to assure that the concern will be taken seriously, the Company will:

- (a) Not allow the individual raising the concern to be victimised for doing so;
- (b) Treat victimisation of whistle blowers as a serious matter, that may lead to disciplinary action that may include dismissal;
- (c) Not attempt to conceal evidence of poor or unacceptable practise
- (d) Take disciplinary action if an employee destroys or conceals evidence of poor or unacceptable practise or misconduct; and
- (e) Ensure confidentiality clauses in employment contracts do not restrict, forbid or penalise whistle blowing.

INDEPENDENT ADVICE

Employees who feel unsure about whether or how to raise a concern or need confidential advice can contact the independent charity Public Concern at Work on Tel: 020 7474 6609 or email: helpline@pcaw.co.uk. Their lawyers can give free confidential advice on how to raise a concern about serious malpractice at work.

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Free information and advice can also be obtained from the Advice, Conciliation and Arbitration Service (ACAS) – Tel: 08457 47 47 47.

POLITICAL AND CHARITABLE DONATIONS & SPONSORSHIP POLICY

The purpose of this policy is to ensure proper management of sponsorships and donations by providing guidelines and requirements for decision-making, approval and reporting. This policy is in line with our Social Objective to donate at least 1% of our annual profits each year:

- Sponsorships and Donations must only be given when there is a clear, legitimate benefit to Eurosafes and/or the communities it operates in, either for commercial or charitable purposes.
- Sponsorship and Donations must be made in compliance with the Eurosafes Bribery and Policy and follow the Sponsorships and Donations Standards (see additional guidance).
- Sponsorship and Donations must only be used for purposes articulated in this Policy.
- We prohibit Sponsorship or Donations linked to political parties.
- Responses to emergency situations must be approved by the Board of Directors
- We follow any laws in the countries we operate in which require us to support local communities.

Eurosafes will only make charitable donation and social sponsorships which support one of more of the following four areas:

- Education & Skills – with a focus on Health & Safety which are key to our future success
- Environment – add a social dimension to our purpose to improve our sustainability impact.
- Social Investment - making a positive difference in the communities we operate
- Arts Culture & Heritage – contributing to cultural vibrancy in places where we are based.

Eurosafes also commit to the following:

- to only provide donations in emergency situations (such as humanitarian crises) following approval from the Board of Directors.
- only provide commercial sponsorship where there is a clear and overriding objective to strengthen the relationship with our customers or other external stakeholders and further enhance our reputation.
- Always keep a record of donations and sponsorships according to their size, nature & level of risk.
- This register will be used to determine the necessary approvals, as well as the nature and extent of relationship management, monitoring and post-completion review and reporting.
- To report publicly the policy, criteria and procedures for contributions and sponsorships and disclose those made on an annual basis.

Authorised By:

Gavin Ellis
Group CEO
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