

Business Integrity and Ethics Policy Statement

(incorporating Modern Slavery code of conduct)

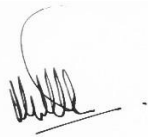
A reputation for integrity has been a cornerstone of Shield's business since it was founded in 1997. It gives customers the confidence that the Company's services meet high standards at all times. Employees at all levels are required to protect Shield's reputation for integrity.

The Company strives to maintain the highest standards of ethical conduct and corporate responsibility through the following principles:

- ★ Compliance with national and international laws and regulations is required as a minimum standard.
- ★ Reputable business practices must be applied at all times.
- ★ Conflicts of interest must be declared and appropriate arrangements made to ensure that those with a material interest are not involved in the decision making process.
- ★ Improper payments of any kind are prohibited, similarly no gift whose value is material and which may be interpreted as a form of inducement should be accepted or offered by Shield employees.
- ★ Reporting of business performance should be undertaken in such a way that senior management is fully and properly informed concerning the business' true performance, risks and opportunities in a timely manner.
- ★ Ethical issues must be dealt with in an efficient and transparent manner.
- ★ A positive contribution to society as a whole, and specifically the communities in which we operate, must be ensured.
- ★ Support for the Modern Slavery Code of Conduct including:
 - ★ Fair contracts of employment and adherence to minimum wage payments
 - ★ No retention of personal ID or documents of proof of right to work in the UK
 - ★ No retention of wages or other deposits or unauthorised deductions with itemised payslips
 - ★ Freedom to join trade unions or workers' organisations
 - ★ No employment of under working age staff
 - ★ Policies for Equal opportunities and equal and humane treatment for all staff
 - ★ Clear grievance procedure
- ★ We must seek to influence our suppliers and sub-contractors to operate to similar high standards as ourselves.

All employees have a duty to follow the principles set out in this policy statement. It is the responsibility of directors and senior management to ensure that all employees who directly or indirectly report to them are fully aware of Shield's policies and values in the conduct of the Company's business. It is also the responsibility of directors and senior management to lead by example and to demonstrate the highest standards of integrity in carrying out their duties on behalf of the Company. These issues are further safeguarded through corporate governance process and monitoring by the board.

Signed:



Date: 1 May 2021

Malcolm Rose, Chief Executive Officer - On behalf of Shield Service Group Ltd