CBS SECURITY & REMOTE MONITORING LIMITED

Security by Design

2026 POLICY DOCUMENTS

Policy DOCUMENTS

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1 QUALITY POLICY

1.1 Vision Statement

TO CREATE, within CBS, a Company committed to their Clients, Employees and the Industry; whose goals are to achieve full Customer Satisfaction, a position envied by many and surpassed by few.

1.2 Quality Policy

The term CBS, in the context of our Policy Statements, shall mean CBS Security & Remote Monitoring Limited.

It is the policy and overall business objective of CBS to provide services of the highest quality and in compliance with the Clients specified requirements.

These services currently include, but are not limited to, the following-

Manned guarding services	BS 7499
Key holding services	BS 7984
Mobile patrol services	BS 7984
Intruder alarm installation, service and maintenance	BS 60839
Fire alarm installation, service and maintenance	BS 5839
CCTV system installation, service and maintenance	BS8418
Access control installation, service and maintenance	BS60839
Door entry installation, service and maintenance	BS60839
Barrier & gate installation, service and maintenance	BS12453
Provision of Security Services	BS10800

It is also the objective of CBS to enhance its reputation and capabilities in order to gain wider recognition within its field of expertise.

CBS recognises that genuine commitment to understanding the present and future needs of its Clients is essential to the achievement of these objectives and thus to continually strive to ensure that the needs and reasonable expectations of the Clients are realised in the quality of the services it provides.

The Quality Management System is described in the Quality Assurance Manual and includes detailed procedures. To further the quality aims of CBS we have ensured that all employees understand and adhere to the requirements of this policy and the contents of the Quality Assurance Manual

The Quality Manual is published as a direct response to the requirements defined by BS EN ISO 9001: 2015.

CBS will constantly monitor its quality performance and will implement Improvements where appropriate.

Signed Neill Pow

Operations Director
Dec 2025

2 ENVIRONMENTAL POLICY

2.1 General

The Company is conscious of the deep concern expressed over the effect that modern industry and techniques have on the environment. In consequence we keep informed of all Legislation, Regulations and Codes of Practice relevant to environmental issues.

We are also committed to reduce the impact of Climate change and will attempt where possible to reduce our impact on the environment and will encourage all our suppliers to do the same.

Our Company acknowledges that steps must be taken, consistent with our client's requirements, to prevent environmental damage, including disruption or nuisance to our neighbors. We therefore endeavour to keep our works clean and tidy and to avoid pollution of the air, ground or water by noise, fumes, dust, or the disposal of materials.
Regular liaison with occupiers, tenant groups, adjoining property owners and other interested parties is seen as an essential part of our strategy.

2.2 Policy

CBS regards the promotion of Environmental Protection as a major objective for management and employees at all levels and shall take practical steps to:

Operate in a manner designed to minimise and wherever practical eliminate releases to air, land or water.
Integrate Environmental factors into business decisions.
Seek suppliers and sub-contractors who have high performance Environmental standards.
Control the creation of waste and wherever practical recycle materials.
Dispose of waste in a safe and responsible manner.
Hold a valid Waste Carrier Licence.
Comply with all relevant legislation which represents minimum standards.

2.3 Co-operation

CBS will co-operate with our customers' Environmental and Health and Safety Policies to ensure effective Environmental Management at all levels on a Project basis.

Signed Neill Pow

Operations Director
Dec 2025

3 EQUAL OPPORTUNITIES POLICY

3.1 General

CBS are an Equal Opportunities employer. The Company is committed to the principles of Equality, Diversity and Inclusion. We are committed to equal opportunities in all we do. In consequence the Company Policy will ensure that recruitment, selection, training, development and promotion procedures result in no applicant or employee receiving less favourable consideration on the grounds of Race, Colour, Nationality, Ethnic Origin, Disability, Religion, Marital Status, Sexual Orientation, Gender Reassignment, Trade Union membership, Responsibility for Dependents or Age.

3.2 Management

Management has the primary responsibility for:

Ensuring equality, not inducing or attempting to induce others to practice unlawful discrimination.
Bringing to the attention of employees any actions or activities that may be in breech of Equality, Diversity, and Inclusion and that they may be subject to disciplinary action for discrimination of any kind. See staff handbook for disciplinary process.

3.3 Employees

Employees have the responsibility for:

Not discriminating against fellow employees, clients, suppliers or members of the public in the course of their employment.
Not inducing or attempting to induce others to practice unlawful discrimination.
Bringing to the attention of Management any discriminatory actions which they encounter.

3.4 Effective Legislation

The Company Policy will operate in accordance with but not limited to the following Legislation.

Equality Act 2010
Disability Discrimination Act 1995
Equal Pay Act 1970 (Amendment) Regulations 2003
The Race Relations Act 1976, (Amendment) Act 2000 and Regulations 2003
Sex Discrimination Act 1975 (Amendment) Regulations 2003

Signed Neill Pow

Operations Director
Dec 2025

3.5 Holiday Policy

Holiday pay will be calculated to the entitlement of 5.6 weeks per year, (as per ACAS guidance, 5.6 multiplied by average working days per week). All holidays must be accrued.

In each 12-month period Employees are entitled to a maximum 28 working shifts, (pro rata), inclusive of Public and Bank holidays in accordance with current legislation. The annual period for holidays is from the 1st. January to the 31st. December and actual accrued days will be measured pro-rata from these dates. There is no carry forward of holiday entitlement from one holiday year to another, (except by ACAS guidelines exceptions).

The holiday entitlement will accrue at a rate of one-twelfth of the annual entitlement for each completed calendar month. Holiday dates are to be booked and agreed with a minimum of one calendar months' notice.

A maximum of 2 weeks can be booked in any single block unless specific agreement is reached under exceptional circumstances.

No holiday dates may be booked between 21st. December and 3rd. January in any holiday year without exceptional circumstances. Holidays cannot be booked for non-rota days. Early booking of holiday periods is advised to enable rosters to be established and to avoid disappointment over the unavailability of selected dates. A maximum of 6 staff can be on leave on any given day.

Staff will be encouraged to book at least three working week periods of per year to allow a regular full rest and recuperation period, with the remaining leave to be booked ad hoc.

Where possible records will be kept of high demand times of year to ensure fairness and inclusivity of all staff, for example New Year and Religious festivals.

Parental leave will be in accordance with the current Legislation in force. Extended leave, without pay, will be subject to individual agreement taking all circumstances into account.

Some exceptions may exist under TUPE rules.

Signed Neill Pow

Operations Director
Dec 2025

4 SUSTAINABILITY & ETHICAL PURCHASING POLICY

4.1 General

At CBS we take social and environmental factors into consideration alongside financial factors in making decisions on the purchase of goods and the commissioning of services.

Our purchasing decisions should, where practical, consider whole life cost and the associated risks and implications for society and the environment. Procurement can make a significant contribution to our goals of sustainable economic development and resource minimisation by ensuring that the goods and services we buy consider optimum environmental performance.

Procurement has an additional role to play in minimising any risk of social exploitation within the supply chain. We believe that this not only makes business sense, it also has the potential to improve the living and working standards of people around the world.

This policy standard sets out the detailed requirements and minimum expectations of our policy of sustainable and ethical procurement. Specifically, it addresses the expectation that our staff and suppliers have a natural respect for our ethical standards in the context of their own particular culture and that relationships with our suppliers are based on the principle of fair and honest dealings at all times. The same principle of fair and honest dealings must be extended to all others with whom our suppliers do business, including employees, sub-contractors and other third parties and their local communities.

More specifically, we seek to avoid adverse social and environmental impact in the supply-chain, the reduction of environmental impact from service operations and the purchase of products that meet recognised environmental standards.

4.2 Ethical Procurement

Our ethical objective is to ensure that people in the supply-chain are treated with respect and have rights with regard to employment including the rights to freely choose employment, freedom of association, payment of a living wage, working hours that comply with National Laws, equal opportunities, recognised employment relationship, freedom from intimidation and to a safe and healthy working environment.

We will prefer organisations that share our commitment to sound environmental performance and improvement. We will develop ad-hoc partnerships with our suppliers and work together to minimise the environmental and social impacts of our supply chain.

Sustainability requirements will be considered and, where appropriate, these will be specified in initial tender documentation for both suppliers and contractors, to ensure suppliers and contractors are aware of our environmental and social criteria at an early stage in the tender process.

Small firms, voluntary and community organisations, social enterprises and ethnic minority businesses are considered members of our supply chain as they play an important role in the local economy and contribute to social cohesion.

4.3 Environmental Impact

Where practicable, we will purchase goods that have a minimal impact upon the environment, both local and global. Factors taken into consideration will include sustainability of resource production, transportation, full life energy/raw material consumption and waste production and percentage recycled content.

Wherever possible we will consume and purchase less by identifying and eradicating wasteful practices within our own operation and those operations where we have influence.

We will re-cycle goods at the end of their life, where this is possible and where it is not possible ensure disposal in the most environmentally sound manner.

To promote and embed the adoption of sustainable services, we will develop and support through appropriate awareness programmes, new methodologies for identifying needs; appraising options; agreeing design and specification; supplier selection; tender evaluation; contract management and supplier development.

4.4 Procurement process

Environmental and social factors should be considered in the purchasing process. Specifically, this includes considering what the product is made from, the product durability, where it is made and by whom, the efficiency of the product during use and the processes involved in its production and distribution, what the disposal requirements are and if it can be reused or recycled.

We will add sustainability into the procurement cycle: identifying needs; appraising options; design and specification; supplier selection; tender evaluation; contract management and supplier development.

We will support national policy and legislation to reduce CO2 emissions, ban ozone depleting substances and protect biodiversity.

4.5 Ethical Procurement Standard

We expect our suppliers to comply with legal requirements and to adopt the following moral principles:

4.6 Regulatory compliance

Suppliers shall comply with all national and other applicable law and regulations.

Where the National Law and this Standard are in conflict, the highest standards consistent with National Law should be applied.

Where the provisions of law and this Standard are not in conflict but address the same subject, the provision, which affords the greatest protection to people and the environment, should be applied.

4.7 Employment

There is no forced, bonded or involuntary prison labour.

All employees without distinction have the right to join or form trade unions of their own choosing and, where a significant proportion of the workforce agree, to bargain collectively.

Employees' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

4.8 Elimination of child labour

The long-term elimination of child labour should take place in a manner consistent with the best interests of the children concerned.

Suppliers should develop or participate in and contribute to policies and programmes that provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.9 Right to a living wage

Wages paid for a standard working week meet or exceed national (or, where applicable, local) legal standards. CBS encourages all employes to register for a standard working week of 48 hours or less.

In any event, wages should not be paid in kind and should be enough to meet basic needs.

All workers should be provided with written and comprehendible information about their employment conditions in respect to wages before they enter employment and the particulars of their wages for the pay period concerned each time that they are paid. Avoidance of excessive working hours

Standard working hours must comply with National Laws and national benchmark industry standards; whichever affords greater protection to the employee.

All Employees should not, on a regular basis, be required to work in excess of 60 hours per week and should be provided with at least one day off for every 7-day period on average.

Overtime requested by the employer must be voluntary and must not be requested on a regular basis.

4.10 No discrimination

A policy of equality for all should be in place and there should be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, religious beliefs, union membership or political affiliation.

4.11 Provision of regular employment

To every extent possible work performed must be on the basis of recognised employment relationship established through National Law and practice.

Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship should not be avoided

Examples include the abuse of labour-only contracting, sub-contracting, or homeworking arrangements, through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, or the excessive use of fixed-term contracts of employment.

4.12 No Harsh or Inhumane Treatment

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse of other forms of intimidation shall be prohibited. Safe and Healthy Working Conditions We expect our suppliers:

To provide a safe and healthy working environment bearing in mind international standards, the prevailing knowledge of the industry and of any specific hazards

To take adequate steps to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working practice and environment.

Provide workers with suitable and sufficient health and safety training, in order that they fully understand the hazards associated with the work activity and environment and the correct practices required to minimise the risks.

Provide suitable and adequate welfare facilities including toilet facilities, drinking water and food storage where required. Accommodation, where provided, shall be clean, safe and meet the needs of the workers.

To assign responsibility for health and safety to a senior management representative.

4.13 Environment Policy Principles

We will use the following best practice principles to guide the implementation of our policy:

Principle 1: Working together.

We will:

Work collaboratively with suppliers in pursuit of this standard:

Guide relationships by the principle of continual improvement:

Welcome rather than penalise suppliers identifying activities that fall below this standard (undertaken by themselves or sub-contractors) and who agree to pursue their aspirations:

Consider a similar ethical trading standard as a reasonable alternative where suppliers are already working towards sustainability.

Principle 2: Making a difference

We will, and we expect our suppliers to:

Use an environmental and social risk-based approach to the implementation of this standard:

Focus attention on those parts of the supply chain where the risk of not meeting this standard is highest and where the maximum difference can be made with resources available.

CBS's suppliers should:

Be prepared to demonstrate the basis of their approach with regard to the above.

Principle 3: Awareness raising and training

We will, and we expect our suppliers to:

Ensure that all relevant people are provided with appropriate training and guidelines to implement the requirements of this standard.

Principle 4: Monitoring and independent verification

We will:

Recognise that implementation of this standard may be assessed through monitoring and independent verification, and that these methods will be developed as our understanding grows.

We will expect our suppliers to:

Provide reasonable access to all relevant information, premises, and workers (through interviews) and co-operate in any assessment against this standard – using reasonable endeavours to ensure that sub-contractors do the same.

Use reasonable endeavours to provide workers covered by this standard with a confidential means to report to the supplier failure to observe its requirements.

Principle 5: Continuous Improvement

We will, and we expect our suppliers to:

Apply a continual improvement approach in agreeing schedules for improvement plans with suppliers not meeting this standard:

Base improvement plans on individual case circumstances; Ultimately, CBS will not do business with a supplier where serious breaches of this standard are identified and where the supplier consistently fails to take corrective action within an agreed timescale.

Policy Summary Social Responsibility

Suppliers must uphold basic human rights.

Suppliers must ensure that all employees have attained the minimum age required in order to be legally employed.
Employees must be free to choose to work for the supplier and free to leave the supplier and there should be no forced, bonded or involuntary labour.

Employee wages and benefits should at least meet industry or national legal standards

Employee working hours and holiday allowances should comply with industry standards or National Laws.

Employee working conditions must be safe and hygienic.

Suppliers should always work within the laws of their country.

Suppliers should have a policy of equality where there is no discrimination.

Suppliers must make every effort to minimise the impact on the environment by seeking continual reduction in the use of resources, waste generation and by re-using and recycling where practical without affecting quality.

No organisation within the supply chain should be linked to an oppressive regime or be involved in a business that may damage the reputation of or is unacceptable to the principles of CBS.

Employees should have freedom to join trade unions or other representative organisations.

4.13A Modern Slavery

Our Company turn over falls below the requirement of Section 54 of the Modern Slavery Act 2015, which requires large employers to produce a modern slavery statement for each financial year.

We fully support the government's objectives to eradicate modern slavery and human trafficking.

Our annual statement will be transparent to provide information to those ensuring worldwide compliance to this policy, including details of our activities and supply chains if any are deemed to be considered in at risk category.

We call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability; and together we can help the government eradicate the injustice and brutality of modern slavery and human trafficking.

4.14 Supplier Management

Supplier's confidential information must not be disclosed to any third party or used in any way without the consent of the supplier.

The relationship between CBS and the supplier should be open and honest and no relevant information should deliberately be withheld by either party.

In competitive situations unsuccessful suppliers should be fully debriefed about the procurement process and the rationale around the decision-making process.

All suppliers should be treated fairly at all stages of the procurement process.

The arbitrary or unfair use of purchasing power or influence is discouraged

With regard to size, maturity and location of suppliers, consideration should be given to the magnitude of business awarded to a supplier, the impact of that business on the supplier and the level of dependence on that business.

Signed Neill Pow

Operations Director
Dec 2025

5 LOSS CONTROL POLICY

5.1 General

It is the policy of the Company to minimize losses by encouraging all employees to work in a regime of total care and discharge of personal responsibilities at all times. Loss and misuse of plant, tools, equipment, PPE, company premises or vehicles will not be tolerated. Employees participating in or condoning such misuse will face formal disciplinary procedures. Similarly, employees engaging in horseplay or condoning such activities which may cause injury, harm or damage to employees, clients, public or property will also face disciplinary action.

All the losses must be reported within 24 hours to the appropriate management representative in the form of a written statement.

Signed Neill Pow

Operations Director
Dec 2025

6 HEALTH & SAFETY POLICY

6.1 General

Health & Safety excellence is a condition of employment within CBS and forms a major element in our relationship with our clients and commercial partners.

We believe that accidents are preventable, and the company continues to strive towards a zero-incident culture. Our Health & Safety Procedures ensure that our employees, at all levels, are involved in safety decisions and incorporate pro-active methods of accident prevention into their working life.

6.2 Goals

- To do no harm to people or property.
- To do no damage to the Environment.
- To add value to all projects.

6.3 Handbook

A Health & Safety Handbook is made available to all employees of the Company outlining the detailed requirements of our Health & Safety Policy and, in particular, the responsibilities of the Health & Safety Act 1974.

Signed Neill Pow

Operations Director
Dec 2025

7 DISABILITY DISCRIMINATION POLICY

7.1 General

The Company complies with the requirements of the Disability Discrimination Act 1995 where applicable.

7.2 Policy

In the event that an employee comes under the requirements of the Disability Discrimination Act 1995, CBS shall take due notice of the specific circumstances and will consider, but not limited to, the following:

- allocating work to someone else
- transferring to another post or another place of work
- making adjustments to the building
- being flexible about hours – allowing for different core working hours and to allow staff to be away from the office for assessment, treatment or rehabilitation
- providing training
- providing modified equipment
- making instructions and manuals more accessible

Signed Neill Pow

Operations Director
Dec 2025

8 HUMAN RIGHTS POLICY

8.1 General

The Company complies with the requirements of the Human Rights Act 1998 where applicable.

8.2 Policy

16 basic human rights have been incorporated into UK law.

The Human Rights Act 1998 gives legal effect in the UK to certain fundamental rights and freedoms contained in the European Convention on Human Rights (ECHR). There are 16 basic rights taken from the European Convention on Human Rights. These rights not only affect matters of life and death like freedom from torture and killing but also affect your rights in everyday life. The rights include:

- right to life
- prohibition of torture
- prohibition of slavery and forced labour
- right to liberty and security
- right to a fair trial
- no punishment without law
- right to respect for private and family life
- freedom of thought, conscience and religion
- freedom of expression
- freedom of assembly and association
- right to marry
- prohibition of discrimination
- protection of property
- right to education
- right to free elections

- abolition of the death penalty

Signed Neill Pow

Operations Director
Dec 2025

9 COSHH POLICY

9.1 General

The Company shall provide the necessary training and information for all employees who may be required to operate in an environment where materials considered as hazardous are prevalent.

The Company shall then provide suitably compliant storage facilities or specialised PPE where appropriate.

CBS request that all clients provide details of any potential hazardous situations prior to works commencing on any site.

Signed Neill Pow

Operations Director
Dec 2025

10 PERSONAL PROTECTIVE EQUIPMENT POLICY

10.1 General

This statement sets out the CBS policy for providing employees with the necessary PPE in order that they may perform their duties safely in compliance with the Health & Safety at Work Act 1974.

10.2 Policy

CBS will provide suitably compliant PPE for its employees and as a minimum this shall include:

- High Visibility Vest
- Safety Footwear

Additional PPE shall be provided on a Risk Assessed basis or as part of staff uniform considerations.

Employees shall be required to maintain their PPE in suitable condition and advise management if equipment is either not fit for purpose or needs to be replaced.

Signed Neill Pow

Operations Director
Dec 2025

11 CUSTOMER CARE POLICY

11.1 General

This statement sets out the CBS Policy on Customer Care. As a Company with no formal Sales Team or Marketing Campaign, the Company relies fundamentally on goodwill from all of its customers in order to continue growth. It is therefore imperative that all Employees understand the importance of this Policy.

11.2 Policy

CBS is committed to Customer Care from the time of any Enquiry taking place. We are committed to providing any customer or potential customer with a professional, efficient and high-quality service at all times.

We will make sure we understand what our customer's needs are and develop our services around our customers' expectations.

We will ensure that our customers help shape the services we deliver by:

- seeking regular feedback on customer satisfaction
- publish details of how customers can tell us about complaints, pay compliments and give us feedback
- investigate all complaints thoroughly, as quickly as possible and learn from any mistakes
- having regular liaison with customers to keep them updated on any works being undertaken or examining their future needs and aspirations

Signed Neill Pow

Operations Director
Dec 2025

12 CORPORATE SOCIAL RESPONSIBILITIES POLICY

12.1 General

This statement sets out the CBS Policy on Corporate Social Responsibilities. As a Company with a reputation to provide our clients with advice and guidance on their security measures it is incumbent on the Company and its Staff to maintain high levels of security and confidentiality when dealing with other Clients or the General Public.

12.2 Policy

CBS is committed to retaining its position as a valued member of the wider community and our Corporate Social Responsibilities are such that we endeavour to be recognised as a business that takes all of its responsibilities seriously and known for providing any customer or potential customer with a professional, efficient and high-quality service at all times.

CBS will deliver their responsibilities by:

- Employing young people on formal Apprenticeships to ensure that we can provide the industry with qualified personnel for the future.
- Offer work experience to young persons.
- Support charitable activities without specifically nominating a single or group of charities.
- Ensure that none of our activities has an adverse effect on society in general
- We will register and resolve customer complaints in accordance with our QMS.
- We shall support and encourage our employees to help local community organisations and activities.
- We shall operate an equal opportunities policy for all present and potential future employees
- We will offer our employees clear and fairs terms of employment and provide resources to enable their continual development
- We shall maintain a clear and fair employee remuneration policy and shall maintain provisions for employee consultation and business involvement
- We shall provide safeguards to ensure that all employees are treated with respect and without sexual, physical or mental harassment
- We shall provide, and strive to maintain, a clean, healthy and safe working environment

- We shall uphold the values of honesty, partnership and fairness in our relationships with stakeholders.
- Our contracts will clearly set out the agreed terms, conditions and the basis of our relationship.
- We will operate in a way that safeguards against unfair business practices
- We will protect the public in line with the requirements of the Private Security Industry Act 2001

Signed Neill Pow

Operations Director
Dec 2025

13 TRAINING POLICY

13.1 General

This statement sets out the CBS Policy on Training. In order to ensure the continuance of growth and to provide Customers with a quality of service the Company has a commitment for Training its staff to the requisite level to.

13.2 Policy

CBS is committed to providing Training to staff based upon the requirements of the business. To this end Training Need Appraisals are carried out annually and supplemented by regular evaluations during operational reviews. We are committed to providing any customer or potential customer with a professional, efficient and high-quality service at all times and training forms an important facet of this service.

We will make sure we understand what our customer's needs are and develop our services around our customers' expectations embodying training as necessary to achieve the desired end result.

We will achieve these ends by:

- Employing young workers on formal Apprenticeships to ensure that we can provide the industry with qualified personnel for the future.
- Employing personnel with basic acceptable qualifications in place
- Encouraging personnel to seek improvement through training initiatives leading to the acquisition of formal qualifications
- Providing formal training for all aspects of our customer's contractual requirements.
- Provide informal training in post for all staff to ensure their competence in the use of systems in place
- Providing product specific training for all new systems introduced by the Company.
- Creating an environment in which obtaining more skills is seen as a positive way of developing careers.
- Offer work experience to young persons.

Signed Neill Pow

Operations Director
Dec 2025

14 INFORMATION SECURITY POLICY

14.1 General

This statement sets out the CBS Policy on Information Security. Security of information and the processing, storage, access and retrieval is implicit in all areas of Company Policy and Procedures. ISO27002 has replaced ISO17799 and has made a few changes. It is not Company Policy at this time to formulate a full procedure including registration with the limited number of personnel accessing data where most activities are already controlled and subjected to monitoring and continuous assessment. See also Data Protection 17 below.

14.2 Policy

CBS is committed to maintaining confidentiality and ensuring the on-going security of information and data regarding the operation of the Company. All documentation is disposed of securely through shredding of sundry notes and documents, being the first stage in the process, through to retaining archival material in accordance with the QMS procedures.

CBS will deliver their responsibilities by:

- Not discussing Client's business or solutions other than in broad terms and always with the Client's consent
- Ensuring that all documentation relating to specific projects is retained in a secure locked environment.
- Providing training for all aspects of Information Security to staff.
- Provide training in post for all staff to ensure their continued competence in the use of systems in place

Signed Neill Pow

Operations Director
Dec 2025

15 VIOLENCE AT WORK POLICY

15.1 General

This statement sets out the CBS Policy on Violence at Work.

15.2 Purpose of the Policy

The purpose of this policy is to set out the CBS policy and procedures to prevent, manage and respond to work-related violence. Management supports this policy and we will not tolerate any instances of work-related violence, including verbal abuse, to our staff. No member of staff will be blamed for an instance of work-related violence caused by a customer or member of the public. All employees have the right to be treated with consideration, dignity and respect.

15.3 Definition of Work Related Violence

CBS define work-related violence as: any incident in which an employee is abused, threatened or assaulted by a member of the public in circumstances arising out of the course of his/her employment.

15.4 Responsibility of Staff and Management

Managers

All managers have a responsibility to implement this policy and to make sure that staff are aware of it and understand it. Managers should also:

- Treat any reports of work-related violence, threats or abuse seriously and respond to them promptly.
- Record details of the incident where appropriate and give all employees involved in the incident full support during the whole process
- Respond and consider seriously any suggestions made by staff about how to improve violence prevention and management, and give feedback to staff about their suggestions, including whether it will be taken forward and if not, why not.
- Set a positive example by reporting all incidents of violence and abuse and not tolerating abusive behaviour from customers and members of the public. Make sure you also offer good customer service and follow specific policies.
- Respond to and, where possible, resolve incidents, ideally before they escalate.

- Monitor incidences of violence and abuse and initiate appropriate action if more measures are needed.

- Review and amend this policy and the risk assessment as necessary.

- Where possible, direct staff to appropriate support and advice after an incident has occurred.

- Encourage other staff members to support their colleagues, including those that might have witnessed the incident.

- If victims are particularly traumatised by the event, provide support where possible, such as time off work or changes to their tasks.

- If an investigation is needed, work with the police and offer any assistance needed to help in their enquiries.

- Managers have a responsibility to act in a way that does not incite or increase the likelihood of violence.

- Any manager found to be encouraging or inciting violence or not resolving potentially violent or abusive situations may be subject to disciplinary action.

Staff

All staff have personal responsibility for their own behaviour and for ensuring that they comply with this policy.

There are a number of things that staff can do to help prevent work-related violence:

- Be aware of the company's policy and comply with it.

- Offer good customer service and be aware of customer needs.

- Recognise the potential for work-related violence and take action to resolve it early on.

- Staff should take positive action and, for example, contact a manager if they think that someone might cause problems.

- Don't accept instances of work-related violence directed towards you or others. Staff should report any instances of violence, threats or abuse, including any details about when it happened, who was involved and any relevant circumstances that may have contributed to the incident.

- Serious incidents should be reported in the DOB book and on an incident report form kept on site.

- Be supportive of colleagues who are victims or witnessed work-related violence. Suggest additional measures to managers which might help to prevent and manage work-related violence.

- Staff have a responsibility to act in a way that does not incite or increase the likelihood of violence.

- Any staff member found to be encouraging or inciting violence may be subject to disciplinary action.

- violence.

15.5 Risk Assessments

The risk assessments for work-related violence are kept within the site-specific Assignment Instructions.

The risk assessments were conducted by the senior manager and are reviewed every year or more frequently if required.

The risks were assessed by talking to staff, reviewing the incident book and considering the work environment. If staff believe a risk factor has not been covered by the assessment nor have ideas on further prevention measures, they should discuss these with their line manager. The contents of the risk assessment are communicated to all staff and appropriate training will be given.

15.6 Training

The following training is provided:

All staff, including new staff, receive awareness training on work-related violence, our policy and procedures, how to prevent work-related violence, reporting procedures and what to do following an incident.

Managers are trained as above, as well as on how to handle complaints effectively.

15.7 Actions Following an Incident

If a staff member is being abused, threatened or attacked, they should approach their manager or a colleague for help. Managers should respond to the situation by talking to the perpetrator, explaining that their behaviour is not acceptable. They should try to resolve the problem and, if that is not possible, call security for assistance.

Medical assistance should be provided immediately where required. The police should be informed of a serious incident involving physical attack or serious cases of threatening or verbal abuse. Police should also be informed of persistent cases of violence, threats and abuse.

If available CCTV records of incidents should be kept in case the police need them. All incidents should be recorded in the DOB book and Incident Report completed and passed to line managers.

Staff members will be encouraged to provide support to any victims or witnesses of violence, threats or abuse through appropriate training, and managers should provide support, including, where needed, allowing time off work for individuals to recover.

15.8 Reporting and Recording Systems

Staff have a responsibility to report incidences of work-related violence, including threats and verbal abuse, to line managers. All incidents, including physical attacks, serious or persistent threats and verbal abuse, must be recorded in the DOB book on site and an Incident Report completed. This asks for details of when the incident occurred, who was involved, descriptions of the perpetrator and any relevant circumstances that may have contributed to the incident.

Any incidents resulting in major injury to staff or that cause staff to be off work for three days or more must be reported under the RIDDOR Regulations 1995. Any incident which results in a member of the public being taken directly to hospital from the premises must also be reported. Managers should contact the HSE Incident Contact Centre on 0845 300 9923 to report the incident where appropriate.

If managers notice an increase in reports, several reports within a short period or reports about the same perpetrator, managers should record the details, ask staff for more information and take action.

Signed Neill Pow

Operations Director
Dec 2025

16 HARASSMENT IN THE WORKPLACE POLICY

16.1 General

This statement sets out the CBS Policy on Harassment in the Workplace, and further the specific charge of Sexual Harassment in the work place.

16.2 Management

Management has the primary responsibility for:

Not permitting offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. [Bullying]

Not permitting unwanted conduct relating to a relevant protected characteristic, which has the purpose or effect of violating the Individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that Individual. [Harassing]

16.3 Definition of Work Related Violence

It has been argued that behaviour that is considered bullying by one person may be considered firm management by another. Most people agree on extreme cases of bullying and harassment, but it is sometimes the 'grey' areas that cause most problems. As a matter of good practice CBS consider the following to be unacceptable behaviour in the organisation, although the list is not exhaustive and includes:

- spreading malicious rumours or insulting someone by word or behaviour
- copying memos that are critical about someone to others who do not need to know ridiculing or demeaning someone – picking on them or setting them up to fail
- exclusion or victimisation
- unfair treatment
- overbearing supervision or other misuse of power or position
- unwelcome sexual advances – touching, standing too close, display of offensive materials, asking for sexual favours, making decisions on the basis of sexual advances being accepted or rejected
- making threats or comments about job security without foundation
- deliberately undermining a competent worker by overloading and constant criticism preventing individuals progressing by intentionally blocking promotion or training opportunities

It is also recognised that bullying, and harassment, is unlawful and will not be tolerated.

16.4 Definition of Sexual Harassment.

Sexual harassment can be a one-off incident or an ongoing pattern of behaviour.

It can happen in person or in other ways, for example online through things like email, social media or messaging tools.

Examples include:

- making sexual remarks about someone's body, clothing or appearance
- asking questions about someone's sex life
- telling sexually offensive jokes
- making sexual comments or jokes about someone's sexual orientation or gender reassignment
- displaying or sharing pornographic or sexual images, or other sexual content
- touching someone against their will, for example hugging them
- sexual assault or rape

What some people might consider as joking, 'banter' or part of their workplace culture can still be sexual harassment.

Sexual harassment is usually directed at an individual, but it's not always the case. Sometimes there can be a culture of behaviour that's not specifically aimed at one person – such as sharing sexual images. Someone could still make a complaint of sexual harassment in this situation.

The Policy should be read in conjunction with other Company policies [e.g. Equal Opportunities etc.] and grievance procedures detailed in the Staff Handbook will apply to Harassment allegations.

16.5 Responsibility of Staff and Management

Bullying and harassment are not only unacceptable on moral grounds but may, if unchecked or badly handled, create serious problems for the Company:

- poor morale and poor employee relations
- loss of respect for managers and supervisors
- poor performance
- lost productivity
- absence

- resignations
- damage to company reputation
- tribunal and other court cases and payment of unlimited compensation.

The law on sexual harassment is changing on 26 October 2024. By law, all employers will need to take steps to prevent sexual harassment. The new law is the Worker Protection (Amendment of Equality Act 2010) Act 2023.

As an employer, CBS have taken the following steps to prevent sexual harassment.

- remove or reduce risks of sexual harassment to make sure your workplace is safe
- offer support to anyone involved in a sexual harassment complaint
- make it clear to everyone who works for us, or uses our services, that we will not tolerate sexual harassment
- make everyone who works for us aware how to recognise sexual harassment and encourage them to report it
- publish this policy on sexual harassment

16.6 Effective Legislation

The Company Policy will operate in accordance with but not limited to the following Legislation.

- Equality Act 2010
- Disability Discrimination Act 1995
- Equal Pay Act 1970 (Superceded by Part 5, Chapter 3 of the Equality Act 2010)
- The Race Relations Act 1976, (repealed by the Equality Act 2010]
- Sex Discrimination Act 1975 (repealed by the Equality Act 2010] and the Amendment of Equality Act 2010) Act 2023.

Signed Neill Pow

Operations Director
Dec 2025

17 DATA PROTECTION POLICY

17.1 General

CBS needs to collect and use certain types of information about the Individuals or Service Users who come into contact with CBS in order to carry on their work. This personal information must be collected and will be dealt with appropriately whether is collected on paper, stored in a computer database, or recorded on other material and there are safeguards to ensure this under the Data Protection Act 1998.

Additionally, CBS has to conform with the requirements of the General Data Protection Regulation (EU) 2016/679. [GDPR] This legislation replaces the 1995 Data Protection Directive (Directive 95/46/EC) and addresses the export of personal data outside the EU. The GDPR aims primarily to give control back to citizens and residents over their personal data and

17.2 The Data Protection Act 1998

The Data Protection Act is founded on eight principles of data protection. These say that data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than necessary
- Processed in accordance with the rights of data subject
- Be protected in appropriate ways
- Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

17.3 Data Controller

CBS is the Data Controller under the Act, which means that it determines what purposes personal information held, will be used for. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.

17.4 Disclosure

CBS may share data with other agencies such as the local authority, funding bodies and other voluntary agencies.

The Individual/Service User will be made aware in most circumstances how and with whom their information will be shared. There are circumstances where the law allows CBS to disclose data (including sensitive data) without the data subject's consent.

These are:

- Carrying out a legal duty or as authorised by the Secretary of State
- Protecting vital interests of an Individual/Service User or other person
- The Individual/Service User has already made the information public
- Conducting any legal proceedings, obtaining legal advice or defending any legal rights.
- Monitoring for equal opportunities purposes – i.e. race, disability or religion.
- Providing a confidential service where the Individual/Service User's consent cannot be obtained or where it is reasonable to proceed without consent: e.g. where we would wish to avoid forcing stressed or ill Individuals/Service Users to provide consent signatures.

CBS regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal. CBS intends to ensure that personal information is treated lawfully and correctly.

To this end, CBS will adhere to the Principles of Data Protection, as detailed in the Data Protection Act 1998.

Specifically, the Principles require that personal information:

- Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
- Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
- Shall be adequate, relevant and not excessive in relation to those purpose(s)
- Shall be accurate and, where necessary, kept up to date,
- Shall not be kept for longer than is necessary.
- Shall be processed in accordance with the rights of data subjects under the Act,

- Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,

- Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of Individuals/Service Users in relation to the processing of personal information.

- CBS will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information.

- Meet its legal obligations to specify the purposes for which information is used.

- Collect and process appropriate information, and only to the extent that it is needed to fulfill its operational needs or to comply with any legal requirements.

- Ensure the quality of information used.

- Ensure that the rights of people about whom information is held, can be fully exercised under the Act.

- These include:

    - The right to be informed that processing is being undertaken,

    - The right of access to one's personal information.

    - The right to prevent processing in certain circumstances and the right to correct, rectify, block or erase information which is regarded as wrong information).

    - Take appropriate technical and organisational security measures to safeguard personal information.

    - Ensure that personal information is not transferred abroad without suitable safeguards.

    - Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information.

    - Set out clear procedures for responding to requests for information.

17.5 Data Collection

Informed consent is when: -

- An Individual/Service User clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data and then gives their consent.

- CBS will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

- When collecting data, CBS will ensure that the Individual/Service User:

    - Clearly understands why the information is needed.

    - Understands what it will be used for and what the consequences are should the Individual/Service User decide not to give consent to processing.

    - As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed.

    - Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress.

    - Has received sufficient information on why their data is needed and how it will be used.

17.6 Data Storage

Information and records relating to service users will be stored securely and will only be accessible to authorised staff and volunteers.

Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately.

It is CBS's responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

17.7 Data Access and Accuracy

All Individuals/Service Users have the right to access the information CBS holds about them. CBS will also take reasonable steps ensure that this information is kept up to date by asking data subjects whether there have been any changes.

In addition, CBS will ensure that:

- It has a Manager with specific responsibility for ensuring compliance with Data Protection.

- Everyone processing personal information understands that they are contractually responsible for following good data protection practice.
- Everyone processing personal information is appropriately trained to do so.
- Everyone processing personal information is appropriately supervised.
- Anybody wanting to make enquiries about handling personal information knows what to do.
- It deals promptly and courteously with any enquiries about handling personal information.
- It describes clearly how it handles personal information.
- It will regularly review and audit the ways it holds, manages and uses personal information.
- It regularly assesses and evaluates its methods and performance in relation to handling personal information.
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them.
- This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998.

17.8 GDPR Provisions

A Privacy Notice has been added to the CBS website to advise our Customers who we provide details to, e.g. SSAIB, and the fact that they hold and process personal details about them.

17.8.1 Personal data

The term “personal data shall mean any information relating to a person who can be directly or indirectly identified by reference to an identifier such as a CCTV image, access control data, payroll number, biometric data, vehicle number plate etc.

17.8.2 Transparency of Data Protection

Being transparent and providing accessible information to individuals is important to CBS. Generally, CBS are the Data Controller and will collect the information and be responsible for the security of such information. The use and sharing of information is contained within our Policy and will only be retained for periods required by Legislation or on-going situations, generally crime or allegation related.

17.8.3 Conditions for Processing

We will ensure any use of personal data is justified using at least one of the conditions for processing and this will be specifically documented. All staff who are responsible for processing personal data will be aware of the conditions for processing. The conditions for processing will be available to data subjects in the form of a privacy notice.

17.8.4 Justification for Personal Data

We will process personal data in compliance with all eight data protection principles.

We will document the additional justification for the processing of sensitive data, and, will ensure any biometric and genetic data is considered sensitive.

17.8.5 Consent

Generally, the data that we collect is subject to active consent by the data subject. This consent can be revoked at any time.

17.8.6 Criminal Record Checks

Any criminal record checks are justified by law. Criminal record checks cannot be undertaken based solely on the consent of the subject.

17.8.7 Data Portability

Upon request, a data subject should have the right to receive a copy of their data in a structured format. These requests should be processed within one month, provided there is no undue burden and it does not compromise the privacy of other individuals. A data subject may also request that their data is transferred directly to another system. This must be done for free.

17.8.8 Right to be forgotten

A data subject may request that any information held on them is deleted or removed, and any third parties who process or use that data must also comply with the request. An erasure request can be refused if an exemption applies.

17.8.9 Privacy by Design and Default

Privacy by design is an approach to projects that promote privacy and data protection compliance from the start. The DPO will be responsible for conducting Privacy Impact Assessments and ensuring that all IT projects commence with a privacy plan.

When relevant, and when it does not have a negative impact on the data subject, privacy settings will be set to the most private by default.

17.8.10 International Data Transfers

No data may be transferred outside of the EEA without first discussing it with the data protection officer. Specific consent from the data subject must be obtained prior to transferring their data outside the EEA.

17.8.11 Data Audit and Register

Regular data audits to manage and mitigate risks will inform the data register. This contains information on what data is held, where it is stored, how it is used, who is responsible and any further regulations or retention timescales that may be relevant.

17.8.12 Reporting Breaches

All members of staff have an obligation to report actual or potential data protection compliance failures. This allows us to:

- Investigate the failure and take remedial steps if necessary
- Maintain a register of compliance failures
- Notify the Supervisory Authority (SA) of any compliance failures that are material either in their own right or as part of a pattern of failures

Please refer to our Compliance Failure Policy for our reporting procedure.

17.8.13 Monitoring

Everyone must observe this policy. The DPO has overall responsibility for this policy. They will monitor it regularly to make sure it is being adhered to.

17.9 Consequences of Failing to Comply

We take compliance with this policy very seriously. Failure to comply puts both individuals and the Company at risk.

The importance of this policy means that failure to comply with any requirement may lead to disciplinary action under our procedures which may result in dismissal.

17.10 Glossary of Terms

Data Controller – The person who (either alone or with others) decides what personal information CBS will hold and how it will be held or used.

Data Protection Act 1998 – The UK legislation that provides a framework for responsible behaviour by those using personal information.

Data Protection Manager – The person responsible for ensuring that CBS follows its data protection policy and complies with the Data Protection Act 1998.

Individual/Service User – The person whose personal information is being held or processed by CBS for example: a client, an employee, or supporter.

Explicit consent – is a freely given, specific and informed agreement by an Individual/Service User in the processing of personal information about her/him. Explicit consent is needed for processing sensitive data.

Notification – Notifying the Information Commissioner about the data processing activities of CBS, as certain activities may be exempt from notification.

Information Commissioner – The UK Information Commissioner responsible for implementing and overseeing the Data Protection Act 1998.

Processing – means collecting, amending, handling, storing or disclosing personal information.

Personal Information – Information about living individuals that enables them to be identified – e.g. name and address. It does not apply to information about organisations, companies and agencies but applies to named persons, such as individual volunteers or employees within CBS.

Sensitive data – refers to data about:

- Racial or ethnic origin
- Political affiliations
- Religion or similar beliefs
- Trade union membership
- Physical or mental health
- Sexuality
- Criminal record or proceedings

Signed Neill Pow

Operations Director
Dec 2025

18 SOCIAL MEDIA POLICY

18.1 General

Employees of CBS may be able to access social media services and social networking websites at work, either through company IT systems or via their own personal equipment.

This social media policy describes the rules governing use of social media at CBS.
It sets out how staff must behave when using the company's social media accounts. It also explains the rules about using personal social media accounts at work and describes what staff may say about the company on their personal accounts.

18.2 Purpose of the Policy

Social media can bring significant benefits to CBS, particularly for building relationships with current and potential customers.

However, it's important that employees who use social media within the company do so in a way that enhances the company's prospects.

A misjudged status update can generate complaints or damage the company's reputation. There are also security and data protection issues to consider.

This policy explains how employees can use social media safely and effectively.

18.3 Scope

This policy applies to all staff, contractors and volunteers at CBS who use social media while working — no matter whether for business or personal reasons.
It applies no matter whether that social media use takes place on company premises, while travelling for business or while working from home.
Social media sites and services include (but are not limited to):

- Popular social networks like Twitter and Facebook
- Online review websites like Reevoo and Trustpilot
- Sharing and discussion sites like Delicious and Reddit
- Photographic social networks like Flickr and Instagram
- Question and answer social networks like Quora and Yahoo Answers
- Professional social networks like LinkedIn and Sunzu

18.4 Responsibilities

Everyone who operates a company social media account or who uses their personal social media accounts at work has some responsibility for implementing this policy.

However, these people have key responsibilities:

- The senior management are ultimately responsible for ensuring that CBS uses social media safely, appropriately and in line with the company's objectives,

- The Company is responsible for providing apps and tools to manage the company's social media presence and track any key performance indicators. They are also responsible for proactively monitoring for social media security threats.

- The Company is responsible for rolling out marketing ideas and campaigns through our social media channels.

- The Company is responsible for ensuring requests for assistance and support made via social media are followed up.

18.5 Basic Advice

Regardless of which social networks employees are using, or whether they are using business or personal accounts, following these simple rules helps avoid the most common pitfalls:

- Know the social network. Employees should spend time becoming familiar with the social network before contributing. It's important to read any FAQs and understand what is and is not acceptable on a network before posting messages or updates.

- If unsure, don't post it. Staff should err on the side of caution when posting to social networks. If an employee feels an update or message might cause complaints or offence — or be otherwise unsuitable — they should not post it. Staff members can always consult the management for advice.

- Be thoughtful and polite. Many social media users have got into trouble simply by failing to observe basic good manners online. Employees should adopt the same level of courtesy used when communicating via email.

- Look out for security threats. Staff members should be on guard for social engineering and phishing attempts. Social networks are also used to distribute spam and malware.

- Don't make promises without checking. Some social networks are very public, so employees should not make any commitments or promises on behalf of CBS without checking that the company can deliver on the promises.

- Handle complex queries via other channels. Social networks are not a good place to resolve complicated enquiries and customer issues. Once a customer has made contact, employees should handle further communications via the most appropriate channel — usually email or telephone.

- Don’t escalate things. It’s easy to post a quick response to a contentious status update and then regret it. Employees should always take the time to think before responding and hold back if they are in any doubt at all.

18.6 Authorised Users

Only people who have been authorised to use the company’s social networking accounts may do so.

Allowing only designated people to use the accounts ensures the Company’s social media presence is consistent and cohesive.

18.7 Purpose of company social media accounts

CBS’s social media accounts may be used for many different purposes.

In general, employees should only post updates, messages or otherwise use these accounts when that use is clearly in line with the company’s overall objectives.

For instance, employees may use company social media accounts to:

- Respond to customer enquiries and requests for help

- Share blog posts, articles and other content created by the company

- Share insightful articles, videos, media and other content relevant to the business, but created by others

- Provide fans or followers with an insight into what goes on at the company

- Promote marketing campaigns and special offers

- Support new product launches and other initiatives

Social media is a powerful tool that changes quickly. Employees are encouraged to think of new ways to use it, and to put those ideas to management.

18.8 Safe, responsible social media use

The rules in this section apply to:

Any employees using company social media accounts

Employees using personal social media accounts during company time

Users must not:

- Create or transmit material that might be defamatory or incur liability for the company.
- Post message, status updates or links to material or content that is inappropriate.
- Inappropriate content includes: pornography, racial or religious slurs, gender-specific comments, information encouraging criminal skills or terrorism, or materials relating to cults, gambling and illegal drugs.
- This definition of inappropriate content or material also covers any text, images or other media that could reasonably offend someone on the basis of race, age, sex, religious or political beliefs, national origin, disability, sexual orientation, or any other characteristic protected by law.
- Use social media for any illegal or criminal activities.
- Send offensive or harassing material to others via social media.
- Broadcast unsolicited views on social, political, religious or other non-business-related matters.
- Send or post messages or material that could damage CBS's image or reputation.
- Interact with CBS's competitors in any ways which could be interpreted as being offensive, disrespectful or rude. (Communication with direct competitors should be kept to a minimum.)
- Discuss colleagues, competitors, customers or suppliers without their approval.
- Post, upload, forward or link to spam, junk email or chain emails and messages.

18.9 Security and data protection

Employees should be aware of the security and data protection issues that can arise from using social networks.

- Maintain confidentiality
- Users must not:
    - Share or link to any content or information owned by the company that could be considered confidential or commercially sensitive.
    - This might include sales figures, details of key customers, or information about future strategy or marketing campaigns.
    - Share or link to any content or information owned by another company or person that could be considered confidential or commercially sensitive.

For example, if a competitor's marketing strategy was leaked online, employees of CBS should not mention it on social media

- Share or link to data in any way that could breach the company's data protection policy.

- Protect social accounts
- Company social media accounts are protected by strong passwords that are changed regularly and shared only with authorised users.
- Staff must not use a new piece of software, app or service with any of the company's social media accounts without receiving approval from management
- Avoid social scams
- Staff should watch for phishing attempts, where scammers may attempt to use deception to obtain information relating to either the company or its customers.
- Employees should never reveal sensitive details through social media channels. Customer identities must always be verified in the usual way before any account information is shared or discussed.
- Employees should avoid clicking links in posts, updates and direct messages that look suspicious. In particular, users should look out for URLs contained in generic or vague-sounding direct messages.
- Potential sanctions
- Knowingly breaching this social media policy is a serious matter. Users who do so will be subject to disciplinary action, up to and including termination of employment.
- Employees, contractors and other users may also be held personally liable for violating this policy

Where appropriate, the company will involve the police or other law enforcement agencies in relation to breaches of this policy.

Signed Neill Pow

Operations Director
Dec 2025

19 RISK MANAGEMENT POLICY

19.1 General

This statement sets out the CBS policy for the Company's approach to risk management, documents the roles and responsibilities of the senior management team, and other key parties. It also outlines key aspects of the risk management process and identifies the main reporting procedures. This policy has been supplemented by a Risk Management Register and the development of an Organisational Resilience [OR] procedure.

19.2 Policy

CBS will embody the following key principles to outline the Company's approach to risk management and internal control:

- Senior management has responsibility for overseeing risk management within the Company as a whole
- An open and receptive approach to solving risk problems is adopted by senior management
- The senior management team supports, advises and implements approved policies.
- The Company makes conservative and prudent recognition and disclosure of the financial and non-financial implications of risks
- All heads of departments are responsible for encouraging good risk management practice within their department
- Key risk indicators will be identified by the senior management and will be closely monitored on a regular basis.

19.3 Role of the senior management

- The senior management has a fundamental role to play in the management of risk. Its role is to:

- Set the tone and influence the culture of risk management within the Company. This includes:

    - determining whether the Company is 'risk taking' or 'risk averse' as whole or relevant individual issue
    - determining what types of risk are acceptable and which are not
    - setting the standards and expectations of staff with respect to conduct and probity.

- Determine the appropriate risk appetite or level of exposure for the Company.

- Approve major decisions affecting the Company's risk profile or exposure.

- Monitor the management of fundamental risks to reduce the likelihood of unwelcome surprises.

- Satisfy itself that the less fundamental risks are being actively managed, with the appropriate controls in place and working effectively.

- Annually review the Company's approach to risk management and approve changes or improvements to key elements of its processes and procedures.

19.4 Risk management as part of the system of internal control

The system of internal control incorporates risk management. This system encompasses a number of elements that together facilitate an effective and efficient operation, enabling the Company to respond to a variety of operational, financial, and commercial risks. These elements include:

- Policies and procedures

- Attached to fundamental risks are a series of policies that underpin the internal control process. The policies are set by the senior management and implemented and communicated by management to staff. Written procedures support the policies where appropriate.

- Reporting

    - Reporting is designed to monitor key risks and their controls. Decisions to rectify problems are made at regular meetings of the senior management team.

- Business planning and budgeting

    - The business planning and budgeting process is used to set objectives, agree action plans, and allocate resources.

- Internal audit programme

    - Internal audit is an important element of the internal control process. Apart from its normal programme of work, internal audit is responsible for aspects of the annual review of the effectiveness of the internal control system within the organisation.

- external audit.

    - External audit provides feedback to the Quality Manager on the operation of the internal controls reviewed as part of the annual audit.

Signed Neill Pow

Operations Director
Dec 2025

20 DRUGS AND ALCOHOL POLICY

20.1 General

This statement sets out the CBS Policy on Drugs and Alcohol use. The Company Policy is enshrined in the Staff Handbook provided to all staff.

20.2 Policy

No alcoholic drink or non-prescribed drugs will be taken into any Company or Client's premises or consumed during duty hours. All Employees are discouraged from consuming alcohol within 8 hours of the start of a duty shift. Drunkenness, including smelling of drink or the unlawful use of drugs will be deemed a gross misconduct and will result in summary dismissal.

CBS operates a no smoking policy on Company premises unless in a designated area. Employees working on Client premises must observe Client's policies in this regard. Notwithstanding this, all Employees must consider the impression given to our Clients and their Customers.

CBS will deliver their responsibilities by:

- The rules on alcohol and drugs will be strictly enforced.
- Employees with an illness related to alcohol or drugs are encouraged to disclose this at the earliest opportunity to ensure that they seek support and help with treatment.
- All matters concerning alcohol and drugs shall be treated as confidential.
- This policy is designed to comply with relevant legislation such as the Health and Safety at Work Act 1974 and the Misuse of Drugs Act 1971

Signed Neill Pow

Operations Director
Dec 2025

21 ENGINEER'S VAN POLICY

21.1 General

This statement sets out the CBS Policy on the provision of Vans for the use of Engineers. The Company does not provide vans for Engineer's private use but solely for their use in carrying out their duties.

This policy applies to Engineer's employment at Courtyard 4, Coleshill Manor, Coleshill, Warwickshire B46 1DL and all other Company sites that you may be asked to work at from time to time.

21.2 Policy

The vehicle is not provided for Private Use and should be used solely for the purpose of the Company's business.

Therefore, journeys made to and from work and tasks such as making deliveries or visiting customers are acceptable.

Insignificant Private Use is acceptable and; according to the HMRC, private use is insignificant if it is 'very much the exception to the normal use, is intermittent and irregular and last only for short periods of time on odd occasions during the year'.

To help clear up the ambiguity of this statement, the government body cites the following examples of what constitutes insignificant private use:

- If an employee takes an old mattress or other rubbish to the tip once or twice a year.
- If he or she makes a slight detour to drop a child off at school or go to the newsagents on the way to work.
- A dental visit on the way home.

The following examples are deemed to not fall into this category and are therefore worthy of taxation:

- Regular use of the van to do supermarket shopping.
- Taking the van away for a week's holiday.
- Use of the van for social activities outside work.

Signed Neill Pow

Operations Director
Dec 2025

2. Anti-Bribery & Corruption Policy Statement

2.1 CBS is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented.
CBS has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

2.2 CBS will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, regarding our conduct both at home and abroad.

2.3 CBS recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

Signed Neill Pow

Operations Director
Dec 2025