

Ethical Policy and Corporate and Social Responsibility Policy

Purpose

Our ethical policy has been established to set standards and provide guidelines regarding the way Interr and its operating divisions should operate in Ethical matters. It is important to retain this set of core values and approaches to the process of doing business on a daily basis.

Interr believes that implementation of the ethics policy:

- promotes a culture of ethical behaviour throughout the organisation
- sets clear standards for employees
- makes good business sense
- protects the integrity and enhances our reputation
- supports the principles of good corporate governance.

Our Ethical and Corporate and Social Responsibility (CSR) policy focuses around these key areas as follows:

Labour and Human Rights

Interr is committed to the prevention of any violation of established Human Rights of any kind, particularly where child labour or undesirable forced acts are involved.

The Human Rights Act 1998 sets universal standards to ensure that a person's basic needs as a human being are recognised and met.

We will:

- Seek to avoid causing or contributing to adverse human rights impacts through our own activities and address such impacts, if they do occur, in a timely and appropriate manner;
- Seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, products and services through our business relationships;
- Provide for, or cooperate in their remediation through legitimate processes, if we identify that we have caused or contributed to adverse human rights impacts; and
- Continue to look for ways to support the promotion of human rights within our operations and our sphere of influence.

Non-discrimination: Commitment to providing equal opportunities regardless of race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, or any other protected status.

Health and safety: The company ensures a safe and healthy work environment, including proper training, equipment, and protocols.

Fair wages: Commitment to paying employees fair wages that meet or exceed legal standards.

Benefits: Provide a comprehensive package of benefits, including healthcare and retirement plans.

Prohibition of child and forced labour: Interr explicitly states and confirms a commitment to not engage in or support child labour and forced labor.

Freedom of Association and Collective Bargaining and Respect for rights: We acknowledge and respect the rights of workers to form or join trade unions and engage in collective bargaining.

Anti-Harassment and Anti-Discrimination: Any instances of these will be investigated in lines with the company Disciplinary procedures.

Reporting mechanisms: The company has a Whistleblowing policy which provides information and procedures to our employees to report incidents or issues without fear of retaliation.



Training and Awareness:

Training and awareness: Conduct regular training programs to educate employees and management about modern slavery.

Awareness: Foster a culture of respect and awareness regarding human rights issues.

Supply Chain Responsibility and Due diligence: We extend our commitment to labor and human rights standards throughout the supply chain.

Monitoring: Implement mechanisms to monitor and address potential violations in the supply chain.

Monitoring and evaluation: The company regularly assess the effectiveness of policies and procedures and encourage feedback from employees, stakeholders, and other relevant parties for continuous improvement.

Legal Compliance and adherence: We are committed to comply with all applicable local and international labor and human rights laws.

By incorporating these elements into our policy, the company demonstrates a commitment to ethical business practices, contribute to the well-being of their employees, and build a positive reputation in the marketplace.

Working hours and conditions

We are committed to providing a safe and healthy working environment for our employees and people affected by our operations or activities; and understand the importance of this to both employees and other stakeholders.

We believe in always doing the right thing and in doing it safely, without unnecessary risk to people's health and we comply with all relevant legislation. Our 'Health and Safety Policy', sets out our commitments and responsibilities.

We require our suppliers and contractors to comply with all applicable legislation and we are committed to proactive management of health and safety to ensure continual improvement and development in performance.

We will provide a safe and healthy working environment, minimising the risks associated with any specific hazards. We provide all relevant health and safety training and take steps to ensure that appropriate and sufficient health and safety training and assessments are carried out and the correct practices put in place in order to achieve this. Reporting of any injuries, accidents, near misses or incidents training and procedures are in place for all staff.

We ensure rest periods to prevent exploitation and ensure a work-life balance as well as ensure defined standard working hours, including starting and ending times, break period and rest days are in place and clearly communicated. The company acknowledges and recognises the needs of flexible working arrangements, including hybrid or remote working

Suitable welfare facilities will be provided to the employees; these include toilet facilities, first aid, drinking water and food storage where required. This including lighting, ventilation, and ergonomics and have specific procedures for maintaining clean and organised workspaces.

Where appropriate, we ensure that employees have access to appropriate tools, equipment or PPE to perform their tasks safely and effectively and regular maintenance and inspection is completed.

We encourage feedback and open dialogue between management and employees regarding concerns and feedback. The company collates staff feedback on their working conditions, health and safety, relationships and feedback on all company departments and wellbeing and suggestions for improvement via our confidential staff survey portal.

We are committed to complying with relevant labour laws and regulations and recognise the importance of promoting the overall well-being of employees via our health and safety first aiders and mental health first aiders.



We assure our employees that they will not face retaliation for reporting concerns about working conditions.

Comply with national and international laws or industry standards on employee working hours, whichever affords greater protection.

Employment is freely chosen

Afford employees the freedom to choose to work and not use forced, bonded or non-voluntary. Afford employees freedom of association with the right to join an independent trades union or other workers' associations and to carry out reasonable representative functions in the workplace.

Facilitate alternative means of democratic representation where laws restrict freedom of association and collective bargaining.

Provide clear, easily understood disciplinary, grievance and appeal procedures that are lawful and appropriate. Any disciplinary measures should be recorded and suppliers should not seek to deprive employees of their legal or contractual rights.

Equality, diversity, inclusion and Fair treatment

Tolerance and respect for other cultures and customs are essential. We aim to provide equal opportunities and fair treatment, irrespective of social, cultural, ethnic or national origins, religious or other beliefs, caste, gender identity/expression, marital status, pregnancy status, sexual orientation, disability, age, skin color, race, parental status, political ideology, military/veteran status, or trade union activity.

Our Human Resources teams across all countries have put in place Diversity & Inclusion programs. We are also committed to complying with all non-discrimination laws.

We believe that the factors that make people different from each other are a source of innovation, creativity, and performance. By bringing in a range of talent, we gain different perspectives, which is essential in the rapidly changing world in which we operate.

No inhumane treatment is allowed

Any physical abuse or coercion, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is permitted and the company will take action against any such (not limited to) behaviours.

Employees

Interr values its employees as a key resource. An atmosphere of good employee communication, involvement & responsibility both individually and as a team is of central importance. The personal development and optimum use of employee talent is strongly encouraged.

Every employee has an equal opportunity for personal recognition and career development, regardless of personal background or belief. No form of discrimination or harassment will be tolerated. An important part of this policy is recruiting, selecting, rewarding and promoting people who demonstrate entrepreneurial behaviour and show individual initiative in combination with a high degree of knowledge and experience of our products, markets and culture.

Customers

Everybody must play their part in providing quality and efficiency to customers. Interr believes that integrity in dealings with customers is a prerequisite for a successful and sustained business relationship. Personal contact, helpful and responsive action are features of the service we provide to develop long term relations with our customers.

Suppliers

Interr believes in supporting UK trade and therefore will always endeavour to buy from UK based manufacturing companies. Interr will aim to develop relationships with, wherever possible, local suppliers based on mutual trust and



all dealings will be conducted in a professional manner at all times. We also undertake to pay our suppliers on time and according to agreed terms.

Ethical purchasing

Interr will always seek to purchase goods and services that are produced and delivered under labour conditions that meet the Ethical Trade Initiative and therefore do not involve the abuse or exploitation of any person, conform to essential labour standards and have the least negative impact on climate change.

As a result, our purchasing decisions will give preference to:

- suppliers that operate a fair employment policy;
- organisations that provide safe and healthy working conditions for their employees;
- suppliers that contribute to, or participate in, policies that support the elimination of modern slavery in all its forms;
- organisations that provide their employees with the right to a living wage and operate with avoidance of excessive working hours and provision of regular employment;
- suppliers that do not undertake any form of harsh and inhumane treatment;

suppliers who have a clear policy towards anti-bribery

Community

Interr seeks to comply with all legislation affecting its operations. We will seek to serve and support the community in which it operates by providing services efficiently and profitably, and by providing good employment opportunities and conditions. We will take into account the concerns of the wider community including the protection of the public as well as both national and local interests. We endeavour to support the trade organisations that are developing a professional attitude toward the industry and promotion of greater understanding of the security industry in the wider community.

Social Responsibility

Interr is committed to and encourages collaboration with organisations that support Fair Trade and operate non-exploitative employment practices in their own businesses and supply chains throughout the world. It will conversely not invest in or do business with any organisation that:

- manufactures or designs weapons, instruments of warfare or torture, or that derives significant revenue from weapons related products or services; or
- manufactures tobacco products or derives significant revenue from tobacco related production.

Conflict of interest

This policy does not allow bribery or political contributions and requires employees to seek to avoid conflicts of interest and to disclose any that do exist. Employees must ensure that their actions are not affected by conflicts of interests. This covers the receipt of giving of gifts or hospitality which is prohibited.

Information

Interr regards information for the purpose of its business as a corporate asset which must be protected against loss of availability, infringement and improper disclosure. We seek to ensure as far as reasonably practicable, that this information is protected. This applies also to intellectual property including inventions, trade secrets, technical information, product design, production expertise, customers' information etc.

Environment

We see it as our duty of care to our clients, employees, investors, partners, and the community at large, to be proactive with our CSR towards environment. In particular, increasing environmental efficiency will remain at the forefront of our consideration as we recognise the need to protect the natural environment. Keeping our environment clean and unpolluted is a benefit to all. We'll always follow best practices when disposing garbage, recycling, conserving energy or using environmentally – friendly technologies.



Records and Data Privacy

We are committed to protecting all personal data entrusted to its employees, clients, suppliers, and any other business partner or individual it works with, because ensuring data privacy also means protecting fundamental rights and freedoms of the individuals to whom the data relates. Interr complies with the applicable data protection legislations and is committed to applying the highest standards when processing personal data. In particular, ensuring that the processing activities it carries out encompass all the data protection principles.

Honesty, completeness and accuracy of records are vital. Records of transactions should be maintained in an accurate, complete, transparent and timely manner in accordance with accounting principles. No unrecorded funds or assets should be established or maintained.

Freedom of expression

We encourage and recognize the importance of freedom of expression and open dialogue. Recognition of the right to freedom of expression is therefore deeply rooted in the way we operate. At Interr, we believe in aligned entrepreneurship, which is based on collaboration, celebrating differences, and encouraging all our employees to express freely their thoughts and opinions, and engage in open dialogue during team meetings, conference calls, forums, and employee surveys, without any fear of retaliation. We conduct regular Staff surveys among our employees on a variety of topics inviting them to share their honest feedback anonymously.

Freedom of association and collective bargaining

Complementary to freedom of expression and open dialogue is the right to freedom of association and collective bargaining. We respect our employees' right to form and join a trade union, in accordance with national laws, and we recognize such organizations for the purpose of collective bargaining. Our employees can exercise their right without fear of intimidation or reprisal, and irrespective of the country where they are located, while respecting local laws. We ensure that all our employees have recourse to consultation and dialogue.

Remedy

We place importance on the provision of effective remedy wherever human rights impacts occur through company-based grievance and whistleblowing policies. We continue to build the awareness and knowledge of our employees and workers on human rights, including labour rights, encouraging them to speak up, without retribution, about any concerns they may have, including through our grievance and whistleblowing policies.

We are committed to continue increasing the capacity of our management to effectively identify and respond to concerns.

Breaches of this policy

We reserve the right to terminate our relationships with individuals (dismissals under misconduct or gross misconduct) and/or organisation in our supply chain if they breach this policy.

Policy Review

This policy may be amended by Interr at any time in order to take into account changes in legislation and best practice. This policy was last reviewed and agreed by the Board and seeks to be reviewed and updated annually. Any queries arising regarding this policy should be addressed to Mick Tabori.

Mick Tabori - CEO January 2024