

Winns' Security Services Ltd

BUSINESS ETHICS POLICY – GENERAL STATEMENT

Winns Security Services Ltd. (the Company) is committed to ethical business behavior at all times in every aspect of the management and operation of our business.

As part of this commitment, the Company will not tolerate any action or omission by any employee or any other person or organization acting on the Company's behalf that could, by any reasonable interpretation, be considered unethical or fraudulent or could be viewed as malpractice, either commercially or morally.

Our **Director, Alan Davies**, is ultimately responsible for fulfilling this commitment. The Company is also supported by competent external advisors who provide advice, guidance and hands-on assistance with management issues including health, safety, welfare, environment, quality and employment issues. The external advisors take account of the statutory, i.e. legal, and voluntary regulatory requirements that may be applicable to our business, in the advice, support and documentation he provides and those we produce ourselves.

We will take appropriate steps to ensure that our statutory duties are met at all times e.g. in particular (but not exclusively) with regard to the UK Acts, UK Regulations and relevant EC Directives relating to employment, health, safety and welfare, environmental and accountancy practices.

We consider that this commitment also encompasses our responsibility for protecting other persons and organizations with whom we are associated from any harm that could result from any breach in this policy.

It is the duty of our **Chairman** with the support of the **Management Team** to ensure that adequate resources are made available to ensure our statutory obligations are continuously fulfilled and that all management and administration practices, processes, procedures, systems and documentation are designed to remove or minimize the temptation to take 'short-cuts' or to engage in other acts e.g. offering or accepting or soliciting bribery or other corrupt practices that could in any way reflect badly upon our business and our customers.

Each employee and person otherwise engaged by our company will be given such information, instructions, and training as is necessary to enable their full understanding of and compliance with this policy.

Adequate facilities and arrangements will be maintained within our employment practices to encourage 'whistle-blowing' i.e. to encourage employees or their representatives to raise issues such as suspected or identified breaches of this policy.

Competent people, including, where appropriate, specialists from outside the organization, will be appointed to assist us in meeting our statutory duties and those obligations that we have voluntarily adopted, such as this and other Company policies,

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The successful implementation of this policy requires total commitment and co-operation from and between all levels of employee and contracted personnel working for our Company. Each individual has a legal obligation to act within relevant UK and European law and, as such, to act responsibly for his / her own sake and for the sake of his / her colleagues and other people outside the Company with whom we interact.

This policy will be regularly monitored to ensure that the objectives are achieved and it will be reviewed and, if necessary, revised in the light of legislative or organizational changes.

Our 'Fraud and Malpractice response Plan' is given below.

FRAUD & MALPRACTICE RESPONSE PLAN

Winns Security Services Ltd. will, in the event of there being an instance of fraud or malpractice or other breach of the Company's Business Ethics Policy that has involved a Company employee put the following response plan, or the appropriate element(s) of it, into action:

Immediately on receiving a report of or directly identifying an instance of fraud or malpractice or other breach of the Company's Business Ethics Policy, the **Director** will consider whether the matter should be subject to criminal investigation and, if so, will immediately notify the Police.

Whether or not considered a matter for the Police to investigate, the **Director** will (unless advised that it would be prejudicial to a Police investigation) initiate an investigation, following, where appropriate, the disciplinary and, if relevant, the grievance procedures set out in the Company's Terms and Conditions of Employment.

In the case of an Employee being placed under suspicion because of a matter reported by a Client / Customer, then the Employee concerned will, if required by the Client / Customer, be temporarily barred from working at the relevant sites until the matter has been appropriately investigated. The outcome of the investigation will then determine the next step to take in terms of placement of the Employee at relevant sites.

Signed: _____ *ALAN DAVIES* _____ Date: September, 2010

Alan Davies, Director