



ARB SECURITY

CODE OF CONDUCT AND BUSINESS ETHICS

1. ARB Security Mission

To provide a safe and secure working environment for its personnel and clients, achieved through the recruitment of experienced personnel and commitment to respecting Human Rights.

2. Adherence to the Law

ARB Security staff and service employees shall act in accordance with Albanian Law while conducting its business.

3. ARB Security Commitment to Human Rights

3.1 ARB Security is committed to respecting the United Nation's (UN) convention on Human Rights and the International Labour Organisation's (ILO) and Voluntary Principles on Security and Human Rights on fundamental human rights of its staff, service employees, clients and social community.

3.2 ARB Security staff and service employees will have equal opportunities of employment, fair rewards for commitment, career progression based on ability and performance and also necessary qualifications and conduct.

3.3 ARB Security values the knowledge and diversity that bring to the business its staff and service employees from different backgrounds and geographical locations.

3.4 ARB Security trains internally its personnel and invests on them to ensure they have equal opportunities to progress within the company.

4. Health and Safety

4.1 ARB Security will take the necessary measures in order its staff and service employees understand the environmental impact on our activities.

4.2 ARB Security will create and maintain a safe and healthy workplace through the design of the work environment, provision and use of all necessary

equipment, tools and procedures and appropriate training in order to eliminate any risk in the workplace.

4.3 Take appropriate measures to ensure that its employees refrain from using any drug and/or alcohol in the work environment.

5. Conflicts of Interest

5.1 The head of ARB Security, the technical director and the service employee may not be simultaneously an employee of the ministry structures responsible for public order and security, Armed Forces military, State Intelligence Service and Prison Police officer.

5.2 The head of ARB Security shall have no interest, property, or personal property relationship with the official who certifies or licenses the activity of the Private Physical Security Service.

5.3 ARB Security staff and service employees are obliged to advance the legitimate interests of the Company while refraining from any conflict of interest.

5.4 When there is a suspicion that a situation in which our employees are involved in a conflict of interest, then the respective supervisors in the Company draw attention in order to change that possible situation for timely detection of facts and the prevention of conflicting developments. Each employee has the right to immediately notify if he finds that there may be a conflict of interest regarding any work, relationship or financial interest.

5.5 The Company respects the rights of its employees to engage in activities outside the normal time of their employment, provided that such activities do not impair the ability of ARB Security employees to properly perform their duties. In order to avoid such an inference, unless approved by the ARB Security Directors, in writing, an employee shall refrain from using ARB Security or its premises for charitable, political or other purposes outside the employee's normal duties and responsibilities.

5.6 The Company respects the possible engagement of its employees in the political and civil activities of the communities in which they reside and where ARB Security exercises business activity, but requires from them to avoid any involvement that affects the ARB Security activities.

6. Confidentiality

6.1 ARB Security's confidential information is not publicly available and cannot be used or owned by a third party.

6.2 ARB Security staff and service employees will adhere to relevant confidentiality agreements and will accept that any specific information will remain confidential even after the end of employment and cannot be shared with persons outside the company.

6.3 ARB Security staff and service employees will take the necessary steps to protect confidential information relating to business practices and developments, including (but not limited to), trademarks and copyright, intellectual property rights, and computer systems, communication resources and other technological developments.

6.4 ARB Security does not allow the distribution of the information that could damage the company or third parties' reputation and affect its operation and future business. All employees are bound to protect and act in accordance with this policy and has a duty to protect its confidentiality and report immediately any wrong use of this information.

6.5 ARB Security takes every step to ensure third party confidentiality and seeks to protect it at all times. Any violation of this policy will result in disciplinary action, including dismissal.

7. Gifts and hospitality

7.1 ARB Security staff and service employees will not accept gifts, bonuses or entertainment related to their business which may conflict with the provisions of this Policy.

7.2 Gift / hospitality is not granted or accepted for the purpose of influencing a party to take or keep the business in the forefront or as a reward for the provision or retention or advantage of the business or in a clear or implicit exchange for benefits;

7.3 Gift or hospitality may not be in violation of legal and sub legal acts.

7.4 Any gift or hospitality is given on behalf of the Society and not on behalf of the individual;

7.5 Gift or hospitality does not include cash or cash equivalents.

7.6 Gift or hospitality is of a suitable type and value and is given or accepted at an appropriate time, taking into account the business relationship with the other party.

7.7 Gift or hospitality shall be deemed to be appropriate only by an independent third party member in all current circumstances, retrospectively or in perspective.

7.8 Gift / hospitality is given or accepted openly and not secretly.

7.9 Gifts or hospitality are accepted only with prior approval of the Company's holders when the value of the gift or hospitality per person is higher than the announced limits. Gifts or hospitality of an insignificant value such as promotional items (for example pens, notepads, diaries and calendars) or refreshments offered during a meeting are not covered by this rule.

8. Privacy

8.1 ARB security, while recruiting its personnel, let them know about the legal reasons of obtaining any private data from them, why it collects it, and what it does with it.

8.2 Collection, use, or disclosure of its personal information should normally be done only with employees' knowledge and consent.

8.3 Any employees' personal information will be accurate, complete, and updated.

8.4 Employees will be able to access their personal information in order to verify its accuracy and completeness.

9. Anticorruption/Bribery

9.1 ARB Security does not tolerate any corruption/bribery. It does not provide, seek, give or accept bribes or improper advantages for business or private benefits, both directly as well as indirectly, for themselves or for others.

9.2 ARB Security staff and service employees have a personal responsibility to actively work to prevent corruption of every form, active or passive. Incidents or concerns must be reported respectively

9.3 Encouragement of the employees to report corruption cases.

9.4 Transparent processes in the recruiting and managing of human resources

10. Relationships with the Government

10.1 ARB Security respects the authority of the governments in the area in which it conducts its business. It assures that its staff and service employees maintain honest, transparent and ethical relationship with the government, their agencies, officials and personnel, specifically with State Police.

10.2 Staff and service employees must ensure that when providing company information to representatives of the government, that it is accurate, comprehensive and in compliance with applicable laws and regulations relating to corporate participation in public affairs.

11. Harassment, Discrimination and Misconduct

11.1 ARB Security does not tolerate abusing, bullying or harassment of any kind and expects its employees to respect this policy and each other at all times.

11.2 ARB Security does not tolerate any discrimination based upon religion, gender, age, ethnicity, nationality, disability, sexual orientation, social origins and associations with all recruitment and promotional decisions based purely on performance, merit and qualifications necessary only.

11.3 ARB Security will require from all its personnel to report any incidents of harassment or abuse of co-employees. Any form of harassment within the company will not be tolerated.

12. Sexual Exploitation

12.1 ARB Security will not benefit from, nor allow its Personnel to engage in or benefit from, sexual exploitation (including, for these purposes, prostitution) and abuse or gender-based violence or crimes, either within the Company or

externally, including rape, sexual harassment, or any other form of sexual abuse or violence.

12.2 ARB Security will require its Personnel to, remain vigilant for all instances of sexual or gender-based violence and, where discovered, report such instances to competent ARB Security or/and State authorities.

12.3 ARB Security while contracting with clients and/or business partners, identifies even the possibilities of problems related with sexual exploitation. If this is the case, it defies additional requirements for the security personnel and staff.

12.4 ARB Security will require from its Personnel to report any acts of sexual exploitation nature that affect either the Company or contractor and business partners.

13. Prohibition of Torture

13.1 ARB Security will not, and will require that its Personnel not, engage in torture or other cruel, inhuman or degrading treatment or punishment.

13.2 ARB Security will sensitize its security personnel and staff that contractual obligations, superior orders or exceptional circumstances such as an armed conflict or an imminent armed conflict, a threat to national or international security, internal political instability, or any other public emergency, can never be a justification for engaging in torture or other cruel, inhuman or degrading treatment or punishment.

13.3 ARB Security will require that its Personnel report any acts of torture or other cruel, inhuman or degrading treatment or punishment, known to them, or of which they have reasonable suspicion. Such reports will be made to the Client and one or more of the following: the competent authorities in the country where the acts took place, the country of nationality of the victim, or the country of nationality of the perpetrator.

14. Restricting Apprehending Persons

14.1 ARB Security will require its Personnel to not take or hold any persons except when apprehending persons to defend themselves or others against an imminent threat of violence, or following an attack or crime committed by such persons

against Company Personnel, or against clients or property under their protection, pending the handover of such detained persons to the Competent Authority at the earliest opportunity.

14.2 Any above mentioned apprehension will be consistent with applicable national or international law and be reported to the Client without delay.

14.3 ARB Security will require that its Personnel to treat all apprehended persons humanely and consistent with their status and protections under applicable human rights law or international humanitarian law, including in particular prohibitions on torture or other cruel, inhuman or degrading treatment or punishment.

15. Prevention and combating of human trafficking policy

15.1 International code of conducts' requirements and national legal obligations are the fundamental principles and rights at work are two main pillars of ARB Security related to the prevention and combating of human trafficking.

15.2 Based on these two pillars, the overall ARB Security policies and procedures aim building of a solid human rights for the promotion of fundamental principles and rights at work.

15.3 ARB Security staff responsible for the employee recruiting works based on well-adjusted and strict regulations based on codes of conduct, systems of certification and transparent ratings.

15.4 ARB Security has in place its adequate mechanisms of recruitment and human rights, respectively Human resources, Recruitment Board and Human Rights Office.

15.5 As related to the prevention and combating of the human trafficking, the overall purpose of these three instruments is to strengthen action against and to prevent forced labour, physical and sexual violence, recruitment of workers into hazardous and unsafe work and protecting persons, particularly migrant workers, from possible abusive and fraudulent practices during the recruitment and placement process.

15.6 Its human resources staff and respective boards, being in compliance with regard to national and international standards, are obliged to identify and exclude any informal action while in the process of screening, vetting and recruiting of the

personnel in order to protect its candidates from fraudulent, exploitative and abusive practices.

15.7 ARB Security's policies and procedures ensure that any citizen that wants to be employed from it, is transparently made aware with regards to contracts, working and living conditions as well, through disclosing relevant information.

15.8 ARB Security recruits local employees for its physical security contracted sites, so its policies exclude recruiting of migrant employees.

ARB Security

**Legal Representative
Perparim Hasani**

