



CODE OF ETHICS & BUSINESS CONDUCT

The standards that guide how Horizon conducts its business and security operations

OUR COMMITMENT

Horizon is committed to operating lawfully, responsibly and with integrity. Our reputation depends on the trust placed in us by clients, personnel, learners, partners, communities and other stakeholders. We expect everyone acting for or on behalf of Horizon to uphold this Code, exercise sound judgement and speak up where conduct falls short of our standards.

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1. Purpose and scope

This Code sets out the ethical principles and standards of conduct expected across Horizon Security Solutions Ltd. It is intended to support responsible decision-making, protect the people and communities affected by our work, and preserve the trust on which our business depends.

It applies to Horizon directors, employees, workers, instructors, consultants, contractors, subcontractors and any other person acting for or on behalf of Horizon. We also expect suppliers and business partners to uphold equivalent standards where their activities support Horizon services.

The Code applies wherever Horizon operates. Everyone covered by it must comply with applicable UK law, the laws and regulations of the country in which they are working, contractual obligations and any relevant regulatory, licensing or professional requirements. Where standards differ, personnel should seek guidance and follow the higher lawful standard wherever reasonably practicable.

A SIMPLE ETHICAL TEST

Before acting, ask: Is it lawful? Is it consistent with this Code and our contractual obligations? Does it respect human rights, dignity and safety? Would I be comfortable explaining the decision openly to a client, colleague, regulator or member of the public? If the answer is unclear, stop and seek advice before proceeding.

2. Our values

Our original Horizon values remain at the centre of this Code. They have been updated below to make clear what they mean in practice.

Value	What it means at Horizon
Integrity	We act honestly, fairly and transparently. We keep our word, avoid deception and do not allow commercial pressure to compromise lawful or ethical conduct.
Customer focus	We listen to clients, understand their requirements and deliver services with care, professionalism and clear communication. We aim to meet agreed expectations without making promises we cannot responsibly fulfil.
Commitment & reliability	We take ownership of our responsibilities, plan carefully, communicate problems early and do what we say we will do. Reliability includes being dependable when circumstances are difficult or fast-moving.
Performance	We set high professional standards, monitor the quality of our work and seek continuous improvement. Performance never justifies unsafe, unlawful or unethical behaviour.
Expertise	We use competent, appropriately trained and, where required, licensed or qualified personnel. We recognise the limits of our competence and obtain specialist advice or support when necessary.

3. Core ethical standards

3.1 Integrity, honesty and lawful business

- Act honestly and accurately in dealings with clients, learners, colleagues, suppliers, public authorities and other stakeholders.
- Do not falsify records, qualifications, timesheets, expenses, invoices, assessment evidence, incident reports or operational information.
- Do not knowingly participate in unlawful, deceptive or abusive activity, even where requested by a client, partner or person in authority.
- Maintain accurate business and operational records appropriate to the service being delivered.

3.2 Anti-bribery, corruption and fraud

- Horizon has zero tolerance for bribery and corruption. No one acting for Horizon may offer, promise, give, request or accept a bribe, kickback or improper advantage.
- Facilitation payments, secret commissions and disguised payments are prohibited unless a payment is required to protect life or physical safety, in which case it must be reported as soon as practicable.

- Gifts, hospitality and expenses must be reasonable, proportionate, transparent and never intended to influence a decision improperly.
- Suspected fraud, theft, money laundering, corruption or other financial misconduct must be reported promptly.

3.3 Conflicts of interest

- Personal, family, financial or outside-business interests must not improperly influence decisions made on behalf of Horizon.
- Actual, potential or perceived conflicts must be disclosed to a manager or senior member of staff as soon as they arise.
- No one should use Horizon information, relationships, property or opportunities for undisclosed personal gain.

3.4 Fair competition and responsible contracting

- We compete fairly and do not seek business through collusion, intimidation, misrepresentation, improper inducements or misuse of confidential information.
- We seek to contract with legitimate clients, suppliers and partners and will not knowingly support activities that are unlawful or fundamentally inconsistent with this Code.
- Commercial objectives do not override our obligations relating to law, safety, human rights or professional conduct.

4. Human rights and responsible security operations

As a security company, Horizon recognises that our services can affect the rights, safety and dignity of individuals and communities. We therefore expect a particularly high standard of judgement, restraint and accountability in operational activity.

4.1 Human rights and humanitarian responsibilities

- Respect internationally recognised human rights and, where applicable to the circumstances of an operation, relevant principles of international humanitarian law.
- Treat all people humanely and with dignity, regardless of nationality, race, ethnic origin, religion or belief, sex, disability, age, sexual orientation, gender reassignment or any other status protected by applicable law.
- Do not tolerate torture, cruel, inhuman or degrading treatment, collective punishment, sexual exploitation or abuse, trafficking in persons, forced labour or other serious abuse.
- Take reasonable steps to avoid causing, contributing to or being directly linked to human rights harm through Horizon activities or business relationships.

4.2 Use of force, detention and weapons

- Any use of force must be lawful, necessary and proportionate to the threat or legitimate objective, and should be used only for as long as necessary.
- Personnel must seek to de-escalate situations where it is safe and reasonable to do so and must never use force as punishment, retaliation or intimidation.
- Weapons may only be carried, handled or used where lawful, contractually authorised, operationally necessary and by personnel who are suitably trained and authorised.
- Any detention, search or restraint must have a lawful basis and be conducted with due regard for dignity, safety and applicable procedures.
- Serious incidents involving force, weapons, injury, detention or alleged abuse must be reported and recorded promptly and accurately.

4.3 Host communities and local context

- Operate with respect for the lawful customs, culture and religions of host communities while never using local practice as a justification for unlawful discrimination or abuse.
- Avoid conduct that could unnecessarily inflame tensions, undermine community safety or damage trust in Horizon or its clients.
- Consider the foreseeable impact of operations on local people and the environment, and take reasonable steps to reduce avoidable harm.

5. Respectful and professional workplace

5.1 Equality, dignity and non-discrimination

- Horizon will not tolerate unlawful discrimination, bullying, harassment, victimisation or abusive behaviour.
- Employment, deployment, training and business decisions should be based on legitimate requirements, competence, conduct and performance.
- Everyone is expected to contribute to a professional environment in which people are treated with respect and concerns can be raised without intimidation.

5.2 Competence, fitness and professional standards

- Personnel must hold any licences, qualifications, training or clearances required for their role and must not misrepresent their competence or experience.
- Personnel must be fit to perform their duties safely and must not work while impaired by alcohol, illegal drugs or any other substance or condition that makes safe performance unreasonable.
- Managers must not knowingly place personnel in roles for which they are not suitably competent, equipped or authorised.

5.3 Health, safety and wellbeing

- We plan and conduct work with proper regard for the health and safety of personnel, clients, learners and others who may be affected.
- Personnel must follow lawful safety instructions, use required protective equipment and report hazards, near misses and incidents.
- No commercial or operational objective justifies exposing people to an avoidable and unreasonable risk of harm.

6. Modern slavery, exploitation and supply chains

Horizon rejects slavery, servitude, forced or compulsory labour, human trafficking and the exploitation of children. These principles apply to our own activities and to the way we select and work with third parties.

- We do not knowingly use or support forced labour, trafficked labour or exploitative recruitment practices.
- We expect workers to be engaged voluntarily and to retain control of their personal identity documents unless temporary custody is lawfully required and freely agreed for a legitimate purpose.
- Recruitment fees, coercion, threats, debt bondage and restrictions on freedom of movement that amount to exploitation are unacceptable.
- Where a modern slavery or trafficking risk is identified, Horizon will assess the concern, protect affected people where reasonably possible and take appropriate action with the supplier, client or relevant authority.

7. Confidentiality, information and data protection

- Protect client, learner, employee, operational and commercially sensitive information from unauthorised access, use or disclosure.
- Access information only where there is a legitimate business need and share it only with authorised persons.
- Handle personal data lawfully, fairly, transparently and securely in accordance with applicable data protection law and Horizon policies.
- Do not use confidential or personal information for personal advantage, unauthorised media activity or any purpose unrelated to legitimate Horizon business.
- Report suspected data loss, cyber incidents, unauthorised disclosure or compromise of sensitive information promptly.

8. Company assets, environment and responsible use of resources

- Use Horizon funds, equipment, vehicles, systems, intellectual property and other assets responsibly and only for authorised purposes.
- Take reasonable care to prevent loss, damage, misuse, theft and unnecessary waste.
- Comply with applicable environmental requirements and seek to reduce avoidable environmental impact, particularly where operations affect local communities or sensitive locations.
- Do not use Horizon systems or resources to support unlawful, discriminatory, abusive or otherwise prohibited activity.

9. Speaking up, complaints and non-retaliation

Ethical standards are meaningful only if concerns can be raised. Horizon expects personnel to report suspected misconduct, unsafe practice, human rights concerns, fraud, corruption or other serious breaches of this Code.

- Concerns may be raised with a line manager, another senior member of Horizon staff or directly by email to info@horizon.uk.com.
- A person does not need to raise a concern through someone who may be involved in the matter. Concerns may be escalated to senior management where appropriate.
- Horizon will not tolerate retaliation against a person for raising a genuine concern in good faith, assisting an investigation or exercising a legally protected right.
- Where a concern indicates a serious criminal offence, safeguarding issue, regulatory breach or immediate threat to life or safety, Horizon may need to notify an appropriate authority or other relevant body.
- Customers, learners and third parties may also use Horizon's Complaints & Feedback Policy.

IF YOU ARE UNSURE

Do not ignore an ethical concern because you are uncertain whether it amounts to a formal breach. Raise it early. Asking for advice or reporting a genuine concern is preferable to allowing a potentially serious issue to develop.

10. Third parties, managers and accountability

10.1 Suppliers, contractors and partners

- Horizon will take a proportionate, risk-based approach to selecting and managing suppliers, subcontractors and other business partners.
- Where appropriate, contracts and due diligence should address legal compliance, competence, human rights, anti-bribery, confidentiality, data protection, health and safety and other material risks.
- Horizon may require corrective action, suspend work or end a business relationship where serious or persistent conduct is inconsistent with this Code or applicable law.

10.2 Responsibilities of managers

- Managers are expected to model the Code, make expectations clear, take concerns seriously and avoid creating incentives that encourage unsafe or unethical shortcuts.
- Managers must escalate serious concerns promptly and support fair, impartial investigations.
- No manager may instruct or pressure another person to breach the law, this Code or a mandatory safety requirement.

10.3 Investigation and consequences

Suspected breaches will be considered fairly and proportionately. Horizon may investigate, preserve relevant records, obtain specialist advice and take interim protective measures where necessary. Confirmed breaches may result in retraining, corrective action, disciplinary action, removal from an assignment, termination of employment or engagement, termination of a supplier relationship, or referral to a client, regulator, awarding organisation or law-enforcement authority where appropriate and lawful.

11. Horizon undertakes to

- Act with integrity and maintain high standards of business ethics and professional conduct.
- Deliver services with reasonable care, competence and respect for client confidentiality.
- Comply with applicable laws, regulations, licensing requirements and contractual obligations in the countries where we operate.
- Work only for lawful purposes and take proportionate steps to understand the clients, partners and activities we support.
- Respect human rights and, where applicable, international humanitarian responsibilities in the planning and delivery of security services.
- Treat people fairly and with dignity and not tolerate unlawful discrimination, harassment, exploitation or abuse.
- Prevent bribery, corruption, fraud, modern slavery and other serious misconduct within our sphere of control.
- Protect confidential information and personal data and use information responsibly.
- Protect the health and safety of personnel, learners, clients and others affected by our activities.
- Respect host communities and seek to minimise avoidable adverse environmental and social impacts.
- Provide credible routes for concerns and complaints and respond appropriately when standards are not met.
- Review this Code periodically and improve our systems where experience, law, regulation or good practice indicates that change is required.

12. Related policies and document control

This Code should be read alongside Horizon policies and procedures relevant to the activity concerned, including the Complaints & Feedback Policy, Training Terms & Conditions, data protection and privacy information, health and safety arrangements, operational procedures and any client- or contract-specific instructions.

The Code is designed to reflect Horizon's ethical commitments together with relevant UK legal requirements and recognised good practice for responsible private security operations. It does not replace applicable law, regulatory rules, employment terms or contractual obligations.

Policy owner	Horizon Security Solutions Ltd - Senior Management
Applies to	Directors, employees, workers, instructors, consultants, contractors, subcontractors and others acting for Horizon
Policy title	Code of Ethics & Business Conduct
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