

1. PURPOSE

The purpose of this Corporate Social Responsibility (CSR) Policy is to outline Stronghold Facility Services Pty Ltd (SHFS) commitment to ethical business practices, sustainability, and contributing positively to society and the environment. This Policy reflects our dedication to corporate citizenship and social responsibility by promoting responsible business conduct. SHFS is committed to being recognised as a leader in the field of Corporate Social Responsibility and recognizes that in doing so, we will add significant value for our stakeholders.

2. SCOPE

This Policy applies to all employees, contractors, vendors and authorized representatives acting on behalf of SHFS. It encompasses all aspects of CSR, including environmental stewardship, ethical business conduct and community engagement. SHFS Management will ensure that appropriate organizational structures are in place to effectively identify, monitor, and manage Corporate Social Responsibility issues and performance relevant to our businesses.

SHFS will conduct its business in an open, honest, and ethical manner. We recognize the importance of protecting all our human, financial, physical, informational, social, environmental, and reputational assets. SHFS will advise our partners, contractors, and suppliers of our Corporate Social Responsibility Policy, and will work with them to achieve consistency with this policy. SHFS is committed to measuring, auditing and publicly reporting performance on its Corporate Social Responsibility programs.

3. POLICY STATEMENTS

Ethical Business Conduct

SHFS is committed to conducting business with the highest ethical standards, integrity, and transparency. We will comply with all applicable laws and regulations in all regions in which we operate. Our commitment to Ethical Business Conduct includes:

Transparency

SHFS pledges to maintain accurate, and transparent records of all business operations, permits, insurances, and licenses. Concerning business integrity and ethics, social and labour conditions, health and safety in their operations, and environmental impacts, suppliers must operate transparently and comply with appropriate third-party assessments.

Anti-Bribery and Corruption

SHFS does not tolerate the giving or receiving of bribes, including the making of facilitation payments. It expects that all directors, employees, and consultants working, whether directly or indirectly for or on behalf of SHFS comply with these principles in the performance of their services.

SHFS also expects its Suppliers to comply with all applicable laws, statutes and regulations relating to anti-bribery and anti-corruption; including but not limited to state and commonwealth law, and to not engage in any activity, practise or conduct which would constitute an offence under such requirements. SHFS will not tolerate fraudulent or corrupt behaviour or engage in bribery, corruption, extortion, embezzlement or any form of unethical inducement or facilitation of payments and will not tolerate any such behaviour from suppliers or its representatives.

SHFS has a zero-tolerance policy towards corruption and bribery, ensuring:

- All employees and partners adhere to our strict anti-corruption guidelines.
- Regular training and awareness programs on ethical conduct.
- Prompt reporting and investigation of any suspected unethical behaviour.



Labour and Modern Slavery

SHFS is fundamentally committed to ensuring that there is no slavery or human trafficking in its supply chains or any part of the business. As a professional services supplier, SHFS works to provide its clients with the highest level of service attainable. SHFS holds itself to the utmost standards of professional conduct and will accept nothing less from its staff, suppliers and contractors.

- SHFS requires all staff to consider the risks of Modern Slavery practices in our operations and supply chains and identify these where they are found to exist.
- SHFS requires all staff to read and understand the Modern Slavery Code of Conduct and adhere to the code
- SHFS requires all suppliers and contractors to consider the risks of Modern Slavery practices in their operations and supply chains and identify these where they are found to exist.
- SHFS requires all suppliers and contractors to read and understand the Modern Slavery Code of Conduct and adhere to the code

Integrity and Transparency

We conduct our business with integrity and transparency by:

- Adhering to ethical business practices and complying with all relevant laws and regulations.
- Maintaining open and honest communication with stakeholders.
- Implementing robust governance practices to ensure accountability.

4 Environmental Stewardship

SHFS acknowledges the importance of environmental sustainability. We will Strive to reduce our environmental footprint by:

- Reducing energy consumption
- Minimizing waste and promoting recycling and responsible disposal practices
- Implementing eco-friendly initiatives and practices in our operations
- Evaluating and mitigating environmental risks associated with our business activities

Energy Efficiency

We strive to reduce our carbon footprint by implementing energy-efficient practices in our offices and operations. This includes:

- Utilizing energy-efficient lighting, heating, and cooling systems.
- Encouraging the use of renewable energy sources where feasible.
- Promoting the use of energy-efficient vehicles for our service fleet.

Waste Reduction

SHFS is committed to minimizing waste through:

- Implementing recycling programs for paper, plastics, and electronics.
- Encouraging digital documentation to reduce paper consumption.
- Proper disposal of hazardous materials in compliance with environmental regulations.



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Resource Conservation

We aim to conserve natural resources by:

- Using sustainable materials in our procurement processes.
- Reducing water consumption through efficient practices and technologies.
- Supporting and promoting the use of environmentally friendly products and services

SHFS continuously reviews and improve our internal environmental systems to maintain our ISO 14001 certification in environmental management — ensuring that we continue to operate effectively and in a socially and environmentally responsible way. By maintaining this respected international standard, and through our memberships and subscriptions to industry leading forums and networks, we aspire to excellence in environmental sustainability management.

Social Responsibility

SHFS is dedicated to positively impacting the communities in which we operate. We will engage in initiatives that support education, social welfare and community development. SHFS stresses collaborative, consultative, and partnership approaches in our community investment programs. SHFS will integrate Community Investment considerations into decision-making and business practices, and will assist in local capacity building to develop mutually beneficial relationships with communities. SHFS will contribute to our host communities' quality of life by supporting innovative programs in health, education, social services and the environment, as well as cultural and civic projects. SHFS will also strive to provide employment and economic opportunities in the communities where we operate.

As an Australian owned and operated business, we are proud of our responsibility to contribute to the communities in which we operate. We actively support community groups and charities by giving practical and meaningful assistance. This is achieved through helping with fundraising efforts, sponsorship, no-cost services at certain events and volunteering for any additional help that we can offer.

Employee Welfare

We prioritize the well-being and development of our employees by:

- Ensuring a safe and healthy work environment.
- Providing opportunities for professional development and training.
- Promoting diversity, equity, and inclusion within our workforce.

Community Engagement

SHFS is dedicated to contributing positively to the communities we serve by:

- Supporting local initiatives and charitable organizations.
- Encouraging employee volunteerism and community involvement.
- Engaging in partnerships that foster community safety and development.

Sustainable Service Solutions

We are committed to delivering service solutions that are both effective and sustainable by:

- Integrating advanced technologies that minimize environmental impact.
- Continuously evaluating and improving our service practices to enhance sustainability.
- Promoting the use of sustainable products and services in our service solutions.



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Client Engagement

We work closely with our clients to:

- Understand and incorporate their sustainability goals into our service services.
- Provide tailored service solutions that align with their environmental and social responsibility objectives.
- Educate clients on the benefits of sustainable service practices.

Monitoring and Reporting

We are dedicated to continuously improving our CSR efforts by:

- Regularly monitoring and evaluating our sustainability practices.
- Setting measurable goals and targets for improvement.
- Engaging with stakeholders to gather feedback and drive enhancements.

Transparency in Reporting

SHFS commits to transparency in our CSR efforts by:

- Publishing annual CSR reports that detail our progress and achievements.
- Communicating our sustainability initiatives and performance to stakeholders.
- Being accountable and responsive to stakeholder inquiries and concerns.

Conclusion

SHFS is committed to being a responsible corporate citizen. By integrating sustainable practices into our operations, fostering ethical business conduct, and engaging positively with our communities, we aim to create long-term value for all our stakeholders. This CSR policy reflects our commitment to sustainability and social responsibility as we continue to provide exceptional security solutions.

Daniel Zeitoune

Date

27.11.23

Director

Stronghold Facility Services