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**CODE OF BUSINESS ETHICS AND CONDUCT**

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**BM-SOMS-POL- 02 VER 01**

			<b>Date</b>
<b>Approved By</b>	<b>Chief Executive</b>	<i>N.R.M</i>	<b>01-10-2021</b>

## **CODE OF BUSINESS ETHICS AND CONDUCT**

This Code is a Policy level document and shall apply to all staff as well as those delivering services on behalf of the company and all our suppliers. It shall govern all activities and operations of BM Security Ltd.

All BM Security business operations, activities and dealings shall be conducted in a manner that evidences a strong commitment to the highest standards of ethics and integrity.

In this endeavour, BM Security Ltd is committed to complying with the following as set forth in the International Code of Conduct.

1. To operate in accordance with this code.
2. To operate in accordance with applicable and relevant laws local, national and international legal, regulatory and other requirements related to its activities and operations and those of any subcontractors or joint ventures and in accordance with relevant corporate standards of business conduct.
3. To operate in a manner that recognizes and supports the rule of law, Relevant international humanitarian law and human rights law, including but not limited to prohibition of torture or other cruel, inhumane, or degrading treatment; awareness and prohibition of sexual exploitation and abuse or gender-based violence, recognition and prevention of human trafficking, child labor, forced labor and slavery and protect the interests of their clients.
4. To take steps to establish and maintain an effective internal governance framework to deter, monitor, report and effectively address adverse impacts on human rights.
5. To provide a means for responding to and resolving allegations of activity that violates any applicable national or international law or this code.
6. To cooperate in good faith with national and international authorities exercising proper jurisdiction regarding national and international investigations of violations of national and international criminal law of violations of international humanitarian law, or of human rights abuse.
7. Applicable international and national employment and environmental laws and codes.
8. International and national measures against bribery, corruption, and similar crimes.
9. Processes for compliance with local, national, and international laws as regards the procurement, licensing, and transshipment of firearms (and other controlled goods) for use in its security operations.
10. Codes or conventions governing our operations for example, The UN Guiding Principles on Business and Human Rights (UNGPs), the International Code of Conduct for Private Security Service Providers (ICoCA) and the Voluntary Principles on Security and Human Rights (VPs).

## **SPECIFIC COMMITMENTS REGARDING MANAGEMENT, GOVERNANCE AND CONDUCT OF PERSONNEL**

1. BM Security has incorporated the Code into company policies and internal controls and compliance systems and integrated it into all relevant elements of its operations.

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2. This includes but not limited to the following procedures.
3. Proper selection and vetting of personnel and subcontractors
4. Establishing and implementing proper HR policies and Personnel contracts in line relevant and applicable labor laws.
5. Providing a safe and healthy working environment
6. Zero tolerance on harassment, threats, violence and abuse of co-workers
7. Establish, communicate the grievance Handling Procedure Personnel and third parties to report and investigate allegations of improper and/or illegal conduct to designated Personnel
8. Offer equal employment opportunities and shall not tolerate Discrimination.
9. Providing a work environment free from illegal drugs and the influence of alcohol.
10. The company shall not tolerate any form of corruption and bribery.
11. Respect for human rights, creating awareness and Compliance
12. The company shall require all staff to take all reasonable steps to avoid the use of force. If force is used, it shall be in a manner consistent with applicable law.
13. BM Security personnel shall not take, hold, detain, or apprehend any persons, except when necessary to defend themselves or others against an imminent threat of violence or following an attack or crime committed by such persons against Company staff, clients, or property under the Company's protection, pending the handover of such apprehended persons to the competent authority at the earliest opportunity humanely.

This code is a statement of the Company's ongoing commitment to ethical behavior. The company may make periodic changes to the Code, as requirements dictate.