

# Septimius Security Code of Conduct

Administration Department

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AD-COC-V1-25

Form Issued Date: 31- December-2024

Form Next Planned Update: 31- December-2025



# **Revisions**

Specify the significance from previous versions of the document

Rev.	Date	Revision Description
00	01/01/2022	Initial release of the document.
01	31/12/2023	Comprehensive review and updates, including layout improvements.
02	31/12/2024	Revisions to align with company standards, enhance document quality, and update layout.



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#### 1. Introduction

The Septimius Security Code of Conduct defines the principles and ethical standards that govern our operations. This policy applies to all employees, contractors, subcontractors, and business partners.

#### **Purpose of this Code**

- Promote a culture of integrity, professionalism, and transparency.
- Ensure adherence to international security standards and human rights principles.
- Protect the reputation of Septimius Security and its stakeholders.
- Establish clear guidelines for ethical decision-making.
- Encourage employees to report misconduct and violations without fear of retaliation.

#### **Core Values**

- Integrity We uphold honesty and ethical conduct in all actions.
- **Professionalism** We maintain the highest standards in security services.
- Respect We treat all individuals with dignity and fairness.
- **Compliance** We follow all laws, regulations, and internal policies.
- Continuous Improvement We consistently enhance our security practices.

# 2. Human Rights & Ethical Conduct Commitment

Septimius Security is committed to protecting human rights and ensuring all security operations align with:

- International Code of Conduct for Private Security Providers (ICoCA)
- United Nations Guiding Principles on Business & Human Rights (UNGPs)
- Libyan labor laws and international legal standards

#### **Human Rights Standards**

- Employees must respect human dignity and avoid any form of abuse, harassment, or discrimination.
- Security personnel must not participate in torture, inhumane treatment, forced labor, or any actions that violate international human rights law.
- Employees must report any suspected human rights violations immediately.



#### **Non-Discrimination & Equal Treatment**

- Discrimination based on race, gender, age, religion, disability, or any other protected category is strictly prohibited.
- Harassment, bullying, or intimidation in any form will not be tolerated.
- Employees are encouraged to report discrimination or harassment incidents confidentially.

#### 3. Professional Conduct

All employees must conduct themselves professionally in their interactions with colleagues, clients, and stakeholders. This includes:

- Maintaining honesty and transparency in all business dealings.
- Protecting confidential company and client information.
- Avoiding conflicts of interest and disclosing any personal relationships that could impact business integrity.
- Ensuring a professional appearance and behavior at all times.

#### **Crisis Management & Business Continuity**

- Employees must follow emergency response protocols and support crisis management efforts.
- Personnel must be prepared for business continuity plans in case of security threats or disruptions.

# 4. Principles of Use of Force

- Force must always be a last resort and should only be used when necessary to prevent harm, protect assets, or ensure public safety.
- De-escalation techniques must be prioritized before considering any physical intervention.
- Any use of force must be reasonable, proportionate, and in compliance with international and local laws.
- Employees must follow strict reporting procedures for any incidents involving the use of force,
   including proper documentation and internal review.

# 5. Whistleblower Protection & Reporting Violations

Employees must report any violations of laws, human rights, or company policies.

#### **Internal Reporting Channels:**

- Direct manager, General Manager, Department Director, or CEO.
- Email: info@septimiussecurity.com or libya@septimiussecurity.com.



#### **External Reporting Options:**

 If internal mechanisms fail, employees may escalate concerns to legal authorities, regulatory bodies, or ICoCA oversight organizations.

#### **Confidentiality & Non-Retaliation Measures:**

- Whistleblowers are fully protected from retaliation, termination, or any form of harassment.
- Reports will be handled confidentially, and only those necessary for the investigation will have access to information.

# 6. Anti-Bribery & Anti-Corruption Policy

Septimius Security has a zero-tolerance policy for bribery and corruption.

#### **Prohibited Practices**

- Offering or accepting bribes, facilitation payments, or kickbacks.
- Engaging in fraudulent business practices.
- Making political contributions on behalf of the company.

#### **Employee Responsibilities:**

- Report any requests for bribes or suspicious activities immediately.
- Refuse any gifts or hospitality that could influence business decisions.
- Ensure all financial transactions are transparent and properly recorded.

# 7. Confidentiality & IT Security

#### **Confidentiality Commitment**

Employees must protect:

- Client data and operational intelligence.
- Employee personal information.
- Company trade secrets and financial information.

## **IT Security Measures:**

- No unauthorized use of personal email accounts or external storage devices.
- Report any cybersecurity threats immediately.
- Use only company-approved communication tools for business matters.



# 8. Workplace Harassment & Discrimination Prevention

- All employees have the right to a safe and respectful workplace.
- Harassment, bullying, and discrimination will not be tolerated.
- Employees can report workplace issues confidentially.

## **Investigation & Resolution Process:**

- Complaints will be investigated impartially.
- Disciplinary actions will be taken against violators.

#### **Training & Awareness:**

- Annual refresher training on workplace conduct.
- Managers are responsible for enforcing anti-harassment policies.

# 9. Social Media & Public Communications

- Employees must not post confidential company or client information on social media.
- Negative comments about Septimius Security, clients, or employees must be avoided.
- Only authorized employees may speak on behalf of the company.
- Employees must respect brand reputation in all communications.

# 10. Employee Accountability & Disciplinary Action

#### Violations of this Code will result in:

- Formal warnings.
- Suspension or termination.
- Legal action if violations breach national or international laws.

#### **Disciplinary Process:**

- Initial Review Report reviewed by HR and management.
- Investigation Evidence gathered and employee interviewed.
- Resolution Decision on disciplinary action taken.
- Appeal Process Employees can challenge decisions.



# 11. Compliance, Monitoring & Annual Review

- Annual employee certification of compliance with this Code.
- Regular audits and risk assessments to ensure adherence.
- The Code is reviewed and updated annually to reflect legal and operational changes.

## 12. Conclusion

Adherence to the **Septimius Security Code of Conduct** is a condition of employment. Employees must:

- Read and understand this Code.
- Comply with all policies and reporting obligations.
- Uphold the highest ethical and professional standards.

Failure to comply will result in disciplinary action.

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