



Corporate Social Responsibility Policy (CSR)

The Corporate Responsibility Policy was approved by the Board on February 27th 2017

As a company with a Global Reach, Sovereign recognises that we influence the lives of many people and that we have an extensive interface with societies around the world. Currently operating in the United Kingdom, throughout Europe and the Americas, with plans to expand into the Southern Hemisphere our long-term business success depends on a high level of corporate responsibility

Our Commitment

We recognise the UN Guiding Principles on Human rights and are committed to operating within the guidelines of these principles both in the way we interact with our own employees, workers and requiring our suppliers to embrace, adopt and action these principles themselves.

We have our own code of conduct and a supplier's code of conduct and are committed to good governance, encouraging and developing our people and ethical operation. This is in addition to any legal requirement from government and regulators.

How do we approach CSR?

- Our Values**
- Our Code of Conduct**
- Our Strategy**

These are appended to this document at the bottom

We are committed to contribute to sustainable economical development and responsible business practices through the following codes:

Business Ethics

- We will always conduct our business in a lawful manner
- We will compete for business on fair terms and solely on the merits of the services we offer
- We will strive to combat corruption and bribery (see anti-corruption below)
- We will carry out our activities according to the principles of good corporate governance
- We will ensure that the social, environmental and ethical commitments of Sovereign are reflected in all of our dealings with customers, suppliers and stakeholders

Human Rights

- We will always conduct our business in a manner that respects the rights and dignity of all people, complying with all legal requirements.
- We respect internationally recognised human rights, as set out in the International Bill of Human Rights and the International Labour Organisation's declaration on Fundamental Principles and Rights at Work.
- We recognise our responsibility to respect human rights and to avoid complicity in human rights abuses, as stated in the UN Guiding Principles on Business and Human Rights.
- We treat everyone who works for Sovereign fairly and without discrimination. Our employees, agency staff and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.
- We respect freedom of association. Where our employees wish to be represented by trade unions we will cooperate in good faith with the bodies that our employees collectively choose to represent them within the appropriate national legal frameworks.
- We respect the rights of communities that may be impacted by our activities. We will seek to identify adverse human rights impacts and take appropriate steps to avoid, minimise or mitigate them.
- We will make contractual commitments with suppliers that encourage them to adhere to the same principles.

Anti-Corruption

- It is the Company's policy to conduct all of its business in an honest and ethical manner. The Company takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates and to implementing and enforcing effective systems to counter bribery.
- The Company will uphold all laws relevant to countering bribery and corruption and is bound by the laws of the UK, including the Bribery Act 2010, in respect of its conduct both at home and abroad. Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if the Company is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for public contracts and face damage to its reputation. The Company therefore takes its legal responsibilities very seriously.
- In this policy third party means any individual or organisation you come into contact with during the course of your work for the Company and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers and government and public bodies, including their advisors, representatives, officials and politicians and political parties.
- This policy applies to all individuals working at all levels, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), contractors, trainees, casual workers and agency staff, agents or any other person associated with the Company, wherever located (collectively referred to as workers in this policy).
- You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Company or under its control. All workers are required to avoid any activity that might lead to or suggest, a breach of this policy.
- A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. This policy does not prohibit normal and

appropriate hospitality (given and received) to or from third parties. The giving or receipt of gifts is not prohibited, if the following requirements are met:

- (a) it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
 - (b) it complies with local law;
 - (c) it is given in the Company's name, not in your name;
 - (d) it does not include cash or a cash equivalent (such as gift certificates or vouchers);
 - (e) it is appropriate in the circumstances - for example, in the UK it is customary for small gifts to be given at Christmas time;
 - (f) taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time; and
 - (g) it is given openly, not secretly.
- Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties.
 - The Company appreciates that the market practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.
 - It is not acceptable for you (or someone on your behalf) to:
 - (a) give, promise to give or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
 - (b) give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
 - (c) accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
 - (d) accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
 - (e) threaten or retaliate against another employee or worker

who has refused to commit a bribery offence or who has raised concerns under this policy; or

(f) engage in any activity that might lead to a breach of this policy.

- The Company does not make and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. If you are asked to make a payment on the Company’s behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt, which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with a Director.
- The Company only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of a Director.
- The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Company or under the Company’s control. As such, you must ensure that you read, understand and comply with this policy and must notify a Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.
- The Company must keep financial records and have appropriate internal controls in place, which will evidence the business reason for making payments to third parties. You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to review by the Compliance Officer. You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the expenses policy and specifically record the reason for the expenditure. All accounts, invoices, memoranda and other

documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

- You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption or if you have any other queries, these should be raised with a Director.
- It is important that you tell a Director as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.
- Employees or workers who refuse to accept or offer a bribe or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- The Company is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your Line Manager and/or a Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure.
- Training on this policy forms part of the induction process for all new employees and other workers. All existing employees and workers will receive regular, relevant training on how to implement and adhere to this policy. The Company's zero-tolerance approach to bribery and corruption must be

communicated to all suppliers, contractors and business partners at the outset of its business relationship with them and as appropriate thereafter. Frequently asked questions about this policy can be found in the Appendix.

- The board of directors has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations, and that all those under the Company's control comply with it. The Chief Operating Officer has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption. Workers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Chief Operating Officer.
- This policy does not form part of any employee's contract of employment and it may be amended at any time.

Our Values

What we value:

Respect

We respect the places in which we operate. This starts with compliance to laws and regulations. We hold ourselves responsible to operating to the highest ethical standards and we behave in ways that will earn the respect and trust of others. Our business is founded on the relationships we have and we respect each other and those with whom

we work. We value diversity of people and thought. We care about the consequences of our decisions, large or small, on those around us.

Safety

Our business is founded on safety in all areas, the safety of our employees and customers being paramount. Everything we do relies upon the safety of our workforce, customers and the communities around us. We care about the safe management of the environment, locally and globally. We are committed to delivering an excellent service wherever that may be in the world.

Excellence

We operate in a high-risk environment and are committed to excellence through good training, regular retraining and the disciplined management of our service delivery teams. We follow and uphold the rules and standards we set for our company. We commit ourselves to quality outcomes and will always look to improve. If something is not right, we will correct it.

Courage

We recognise that our business operates in an ever-changing environment. Reaching the best outcomes often needs the courage to face difficulty and to speak up and stand by what we believe. We always strive to do the right thing. We explore new ways of thinking and are not afraid to ask for help. We are honest with ourselves and actively seek feedback from others.

One Team

Whatever the strength of the individual we will accomplish more by collaborating with each other. We put the team ahead of our personal success and are committed to building its strength and capabilities. We trust each other to deliver on our respective obligations.

Code of Conduct

The purpose of this code is to provide a clear framework within which employees are expected to conduct themselves. Sovereign strives to maintain a work environment for its employees, workers and suppliers

in which honesty, integrity and respect for colleagues are constantly reflected in personal behavior and standards of conduct.

Standards of personal behavior

Equality of opportunity

Each of us individually is responsible for the promotion of inclusivity and for valuing diversity. Sovereign seeks to ensure that the work environment for its employees and workers is supportive, and one where individual respect is shown to all. All employees and workers, regardless of their gender, race, ethnic background, culture, (dis)ability, sexual orientation, age, religion, socio-economic status or any other factor will be supported and encouraged to perform to their potential.

Harassment and bullying

To secure an environment in which all employees and workers are able to flourish and to achieve their full potential, Sovereign is committed to ensuring that everyone is able to work without fear of harassment, bullying or intimidation. Everyone in Sovereign has a part to play by ensuring that their own behaviour, whether intentional or unintentional, does not constitute harassment. Sovereign will take action against inappropriate behaviour, which shows lack of respect for others, or which leads people to feel threatened.

Health and safety

Sovereign places a high priority on providing a safe working environment and will act positively to minimise the incidence of all workplace risks as required by the Health and Safety at Work Act 1974 and other associated legislation. All activities should be carried out with the highest regard for the health and safety of employees, workers and suppliers. Our aim is excellence in health and safety, by means of continuous improvement of standards, and the comprehensive use of risk assessments so as to systematically remove the causes of accidents/incidents and ill-health. This together with more specific aims and objectives, reflects Sovereign's commitment to promote employee's well being.

Relationships with other Employees, workers or Suppliers

Sovereign does not concern itself with the private lives of its employees or workers unless they affect its effective operation or its reputation.

Members of staff who are relatives or who have a close personal relationship should not normally have a supervisory or authorising relationship with each other.

Employees must inform their line manager if they have a close personal relationship with another employee, worker or customer of Sovereign that could be considered as impacting on the way they conduct themselves at work

Performance

Sovereign expects individuals to follow all reasonable rules and instructions given by those supervising or managing their activities and/or work areas.

Misuse of drugs and alcohol

It is a disciplinary offence to be on Company premises and/or carrying out official duties when under the influence of alcohol or non-medically prescribed drugs.

Gambling

Gambling activities must not be conducted on company premises; discretion may be used in relation to small raffles for charitable purposes, national lottery syndicates, occasional sweepstakes etc.

Conduct outside work

Sovereign does not seek to dictate how employees or workers conduct themselves in their personal lives outside work. However, unlawful, anti-social or other conduct by employees, which may jeopardise Sovereign's reputation or position, will be dealt with through the disciplinary procedure.

Dress code

Sovereign does not operate a formal dress code for its employees or workers other than for those who are required to follow a specific dress code to carry out their duties. However, employees and workers must ensure that their dress is appropriate for the situation in which they are working and that they present a professional image and one

that reflects sensitivity to customer perceptions. This may reflect their ethnicity and lifestyle but should not be provocative or cause offence to those with whom they have contact.

Use of equipment for non-work purposes

Sovereign will allow employees reasonable use of equipment and facilities, provided that authorisation has been obtained from the appropriate Director and that the use does not interfere or conflict with the work of Sovereign. Any costs are to be met by the individual.

Private telephone calls

Employees and workers may use company telephone facilities to make occasional private calls for essential or emergency matters. Private international calls are not permitted without prior authorisation.

Use of IT equipment, Internet and social media

Users of the Company IT and/or Internet facilities must behave reasonably towards other users and the facilities and they must behave appropriately. Users who do not behave reasonably and appropriately may be subject to disciplinary action in accordance with relevant procedures.

In particular, employees must not use company facilities to create, display, produce, store, circulate or transmit obscene or pornographic material in any form or medium under any circumstances. Employees may use the company Internet facilities for occasional personal matters, but must not access social media for personal purposes in working hours.

Information security

Sovereign recognises that information and the associated processes, systems and networks are valuable assets and that the management of personal data has important implications for individuals. The Company believes that security is an integral part of the information sharing which is essential to corporate endeavour.

Data protection

Sovereign holds and processes information about employees, workers and other data subjects for administrative and commercial purposes. When handling such information, Sovereign and all staff or others who process or use any personal information must comply with the Data

Protection Principles which are set out in the Data Protection Act 1998.

Raising matters of concern

Employees have a right and a duty to raise concerns, which they may have about breaches of the law or propriety by Sovereign. This should normally be through their Director but in circumstances where this is not appropriate they may approach the Director of Human Resources in confidence. No individual who expresses their views in good faith and in line with this guidance will be penalised for doing so.

Breaches of this code

This code of conduct has been drawn up to provide a source of guidance to the Sovereign's employee and workers. It is not a contractual document and can be amended at any time by Sovereign. All staff must comply with both the provisions of this code and Sovereign's policies and procedures, breaches of which will be taken seriously and may result in disciplinary action up to and including dismissal.

Our Strategy

Sovereign's strategy has developed over the last 10 years from a focus on the London Ground Transportation market to the Global Ground Transportation market, without compromising on the basic foundation of maintaining an excellent service to our customers.

We have and will continue to develop processes and procedures that allow us to maintain an excellent service as driven by the demands and requirements both in the present and emerging.

With this strategy Sovereign is developing as a Global supplier offering seamless and integrated Ground Transportation services to its mainly corporate customers. This foundation places Sovereign in a unique position as it allows us to offer facilities to customers locally and worldwide through an integrated operating platform and App consolidated, if required to a single centre for administration.

Sovereign's strategy is focussed on leveraging the benefits of a consistent, professional service aligning the skills and attributes of its people, based on best practice, standard business practice and thorough excellent implementation of processes in accordance with customer requirements.

In exploiting our unbeatable knowledge and experience we offer solutions to customers, which addresses their specific needs, using local knowledge to supplement processes, adding value to our proposition.

Sovereign will meet the demands of its customers with a uniform offering across cultures and across borders.