

Chancerygate

Corporate Policies

CHANCERYGATE CORPORATE POLICIES

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1. Chancerygate Corporate Policies

- 1.1 This document sets out the corporate governance policies for the Chancerygate group, which includes Chancerygate Group Limited and all of its subsidiaries ('Chancerygate'). Chancerygate is committed to conducting all of our business in a transparent, responsible and ethical manner. These policies set out our expectations and the actions that need to be undertaken to ensure we continue to meet our legal obligations and best practice in connection with corporate governance.
- 1.2 You should familiarise yourself with these policies and comply with them at all times, including any updates or changes notified to you from time to time. Any questions you may have regarding the policies or what you must do to comply with them should be referred to your line manager or to the Chief Operating Officer.
- 1.3 The policies set out in this document apply to all employees unless otherwise indicated, including directors, trainees, interns, secondees, casual and agency staff (collectively referred to as staff). They do not form part of the terms of your employment contract and we may amend these policies at any time without prior notice or consultation.
- 1.4 For non-UK staff, your statutory and other legally defined obligations will be governed by local laws. Consider these policies as a minimum. You should perform your duties to the standard that is the greater of these policies and the legal requirements in effect in your jurisdiction.

2. Responsibility for the Corporate Policies

- 2.1 The Board has ultimate responsibility for compliance with corporate policies.
- 2.2 The Chief Operating Officer has responsibility for setting and reviewing corporate policies, with support from the Head of ESG and Legal Counsel.
- 2.3 Heads of department have day to day responsibility for overseeing and monitoring compliance with the policies within their teams. Line managers must ensure that their direct reports understand the standards of behaviour expected of them and take appropriate action in connection with any failures to comply with a policy, or concerns with regard to the same.
- 2.4 All staff are expected to familiarise themselves with our corporate policies and take responsibility for their own compliance. A declaration of compliance must be provided by all staff on an annual basis and audits will be conducted as deemed necessary and appropriate.
- 2.5 These policies are kept under review on an ongoing basis, with a review undertaken a minimum of once a year, to ensure that the provisions continue to meet our legal obligations and reflect best practice.

Schedule 1 **Anti-Harassment and Bullying Policy**

1. Policy statement

- 1.1. Chancerygate is committed to providing a working environment free from harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect.
- 1.2. This policy covers harassment or bullying which occurs at work and out of the workplace, such as on business trips or at work-related events or social functions. It covers bullying and harassment by staff and also by third parties such as consultants, suppliers or visitors to our premises.

2. What is harassment

- 2.1. Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.
- 2.2. It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.
- 2.3. Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.
- 2.4. A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

3. What is bullying

- 3.1. Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation.
- 3.2. Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:
 - (a) physical or psychological threats;

- (b) overbearing and intimidating levels of supervision;
 - (c) inappropriate derogatory remarks about someone's performance;
- 3.3. Legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to staff in the course of their employment, will not amount to bullying on their own.

4. What should you do

- 4.1. If you are being harassed or bullied, or have observed what you consider to be harassment or bullying of a colleague, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this approach is too difficult or uncomfortable, or you do not consider it to be appropriate, you should speak to your line manager or HR, who can provide confidential advice and assistance in resolving the issue formally or informally.
- 4.2. If informal steps are not appropriate, or have not been successful, you should raise the matter formally under our Grievance Procedure.
- 4.3. We will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. We will consider whether any steps are necessary to manage any ongoing relationship between you and the person accused during the investigation.
- 4.4. Once the investigation is complete, we will inform you of our decision. If we consider you have been harassed or bullied by an employee the matter will be dealt with under the Disciplinary Procedure as a case of possible misconduct or gross misconduct. If the harasser or bully is a third party such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

5. Protection and support for those involved

- 5.1. Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.

6. Record-keeping

- 6.1. Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our Data Protection Policy.

Schedule 2 **Prevention of sexual harassment policy**

1. Policy statement

- 1.1. Chancerygate is committed to promoting an environment free from all forms of sexual harassment and takes a zero-tolerance approach to sexual harassment.
- 1.2. This policy covers sexual harassment which occurs at work and out of the workplace, such as on business trips or at work-related events or social functions. It covers sexual harassment by staff and also by third parties such as consultants, suppliers or visitors to our premises.
- 1.3. This policy focuses explicitly on sexual harassment. An individual can be sexually harassed and also experience unlawful harassment related to one or more of the protected characteristics in the Equality Act 2010 which are sex, race, disability, sexual orientation, age, religion, belief, gender reassignment, marriage and civil partnership, pregnancy and maternity. These forms of unlawful harassment are dealt with in the anti-bullying and harassment policy.

2. What is sexual harassment

- 2.1 Chancerygate is committed to promoting an environment free from all forms of sexual harassment and takes a zero-tolerance approach to sexual harassment.
- 2.2 This policy covers sexual harassment which occurs at work and out of the workplace, such as on business trips or at work-related events or social functions. It covers sexual harassment by staff and also by third parties such as consultants, suppliers or visitors to our premises.
- 2.3 This policy focuses explicitly on sexual harassment. An individual can be sexually harassed and also experience unlawful harassment related to one or more of the protected characteristics in the Equality Act 2010 which are sex, race, disability, sexual orientation, age, religion, belief, gender reassignment, marriage and civil partnership, pregnancy and maternity. These forms of unlawful harassment are dealt with in the anti-bullying and harassment policy.
- 2.4 Sexual harassment is unlawful. It is defined in the Equality Act 2010 as unwanted conduct of a sexual nature which has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them whether the perpetrator intended this or not. One isolated incident can be sexual harassment.
- 2.5 The conduct does not need to be sexually motivated, only sexual in nature.
- 2.6 It is not necessary for someone to object first before conduct can be described as unwanted.
- 2.7 Unwanted conduct of a sexual nature covers a range of behaviours and can include:

- (a) sexual comments, jokes or gestures;
- (b) displaying sexually graphic pictures, posters or photos;
- (c) intrusive questions about a person's private or sex life or a person discussing their own sex life.

2.8 Conduct that is directed at one person may constitute sexual harassment of another person because of the environment it creates.

3. What will we do

3.1 Under the Equality Act 2010 we have a duty to take reasonable steps to prevent sexual harassment of workers in the course of their employment. Chancerygate recognises that there are multiple measures that can help prevent all types of sexual harassment, including but not limited to:

- (a) Mandatory anti-sexual harassment training for all staff on prevention, culture and reporting procedures in relation to sexual harassment.
- (b) As part of the on-boarding process for new staff, ensuring that they receive training and are provided with relevant policies.
- (c) Conducting annual staff surveys to find out about concerns and experiences and of sexual harassment, workplace culture and environment. We will actively monitor progress each year and will introduce targeted learning and development or other interventions as deemed necessary based on the survey results.
- (d) Ensuring staff have access to appropriate resources and a safe confidential space for discussions in person and online
- (e) Making third parties aware of our sexual harassment policy and make it clear Chancerygate does not tolerate sexual harassment. We will set out the actions we will take if a third party sexually harasses a worker including ejecting or banning a third party from events, meetings or contacting workers and reporting criminal acts to the police if appropriate
- (f) Ensuring a zero-tolerance attitude to sexual harassment is clearly communicated to all staff and any third parties, in internal as well as external facing communications.

4. What should you do

4.1 Chancerygate is committed to dealing with cases of sexual harassment promptly, efficiently and sensitively when they become aware of them. You do not have to be the recipient or target of sexual harassment to make a report about it. If you see it happening or become aware of a problem, you have the right to challenge it and report it to a line manager, HR or the Chief Operating Officer.

4.2 This policy includes an informal and formal process for dealing with reports of sexual harassment.

5. Informal process

- 5.1 If you are being sexually harassed, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. This can be done verbally or in writing. If this approach is too difficult or uncomfortable, or you do not consider it to be appropriate, you should speak to your line manager or HR, who can provide confidential advice and assistance in resolving the issue formally or informally.
- 5.2 Chancerygate recognises that sexual harassment may occur in unequal relationships (between a line manager and a staff member) and it may not be possible for you to inform the alleged harasser. You should speak to HR or the Chief Operating Officer who can provide confidential advice and assistance in resolving the issue informally or formally.
- 5.3 An informal or formal complaint can be made directly to a line manager, HR or the Chief Operating Officer.

6. Formal process

- 6.1 If a staff member does not wish to pursue an informal route, the informal route has not been successful, or the case is too serious, you should raise the matter formally under our Grievance Procedure
- 6.2 We will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. We will consider whether any steps are necessary to manage any ongoing relationship between you and the person accused during the investigation.
- 6.3 Once the investigation is complete, we will inform you of our decision. If we consider that the allegation of sexual harassment has been upheld the matter will be dealt with under the Disciplinary Procedure as a case of possible misconduct or gross misconduct. If the harasser is a third party such as a customer or other visitor, we will consider what appropriate action to take. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

7. Protection for those involved

- 7.1 Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.

8. Record-keeping

- 8.1 Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents

compiled during the process. These will be processed in accordance with our Data Protection Policy.

9. Support for staff who have experienced sexual harassment

9.1 Chancerygate commits to making sure that reasonable adjustments are made for the staff member in terms of an individual risk and needs assessment that might include time off work for counselling or to take legal advice, for example.

9.2 If you have experienced sexual harassment at work, you can also contact the following organisations for free and confidential support and advice:

- ACAS - www.acas.org.uk
- Rights of Women free and confidential legal helpline for women who have experienced sexual harassment at work: 0207 490 0152
- Galop, the LGBT+ anti-violence charity, 0800 999 5428
- Citizens Advice Bureau - www.citizensadvice.org.uk
- Equality and Human Rights Commission (EHRC) - www.equalityhumanrights.com

Schedule 3 **Anti-Corruption and Bribery Policy**

1. Policy statement

- 1.1 It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships
- 1.2 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect

2. What is bribery

- 2.1 Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.
- 2.2 Bribery includes offering, promising, giving, accepting or seeking a bribe.
- 2.3 All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your line manager.
- 2.4 Specifically, you must not:
 - (a) give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
 - (b) accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
 - (c) give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- 2.5 You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

3. Gifts and hospitality

- 3.1 This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.
- 3.2 A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process). Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret.
- 3.3 Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers, and business partners.

3.4 If you have any concerns in connection with the perception of, timing or appropriateness of a gift or hospitality, you should speak to your line manager or the Chief Operating Officer prior to making or accepting the same.

4. Approval Process

4.1 All gifts or hospitality with an actual or estimated value in excess of:

- (a) £200 will require the prior written authorisation of your line manager; and
- (b) £500 will require the prior written authorisation of the Chief Operating Officer.

5. Record-keeping

5.1 You must keep a written record of:

- (a) all gifts given or received;
 - (b) all hospitality exceeding a value of £100 given or received,
- and this will be reviewed on an annual basis.

5.2 You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

5.3 All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

6. Compliance with this policy

You must ensure that you read, understand, and comply with this policy, including the undertaking of mandatory training in a timely manner.

7. How to raise a concern

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your line manager or the Chief Operating Officer without delay.

Schedule 4 **Anti-Slavery and Human Trafficking Policy**

1. Policy statement

- 1.1 This document sets out our policy in relation to modern slavery.
- 1.2 We are committed to acting ethically and with integrity in all of our business dealings and to the implementation and enforcement of effective systems and controls aimed at mitigating the risk of modern slavery occurring anywhere in our business or in any of our supply chains.

2. What is Modern Slavery

- 2.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 and a violation of fundamental human rights.
- 2.2 Modern slavery can take many different forms, such as servitude, forced and compulsory labour, child labour or human trafficking. All have in common the deprivation of a person's liberty in order to exploit them for personal or commercial gain.

3. Prevention of modern slavery

- 3.1 We are committed to having a transparent and consistent Group approach to modern slavery and trafficking consistent with our disclosure obligations under the Modern Slavery Act 2015.
- 3.2 Our policy will be reviewed regularly, communicated to our employees and displayed on our company website. Our commitment to preventing modern slavery will be communicated to all our contractors, suppliers and other business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- 3.3 Our Modern Slavery Statement sets out the steps that have been taken to prevent modern slavery and human trafficking. We will not work with any organisation that either has been or is found to be knowingly involved with modern slavery. We expect and require that our suppliers will hold their own suppliers to the same high standards.
- 3.4 We will provide adequate resources and training on the risk our business faces from modern slavery for all staff.

4. Compliance with the policy

- 4.1 You must ensure that you read, understand, and comply with this policy, including the undertaking of mandatory training in a timely manner.
- 4.2 The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.
- 4.3 If you have reason to believe or suspect that a breach of this policy has occurred or is likely to occur, you must follow our response plan and report it as soon as possible.
- 4.4 We aim to encourage openness and will support anyone who raises concerns under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting their suspicion that modern slavery of

whatever form is or may be taking place in part of our own business or in any of our supply chains.

5. Breach

- 5.1 Any employee who breaches this policy will face disciplinary action which could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Schedule 5 Whistleblowing policy

1. Policy statement

- 1.1 We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

2. What is whistleblowing?

- 2.1 Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

3. How to raise a concern

- 3.1 We hope that in many cases you will be able to raise any concerns with your line manager. However, where you prefer not to raise it with your manager for any reason, you should contact the Chief Operating Officer.
- 3.2 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

4. Confidentiality

- 4.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

5. External disclosures

- 5.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
- 5.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

6. Protection and support for whistleblowers

- 6.1 We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

- 6.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Chief Operating Officer or HR immediately.
- 6.3 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases the whistleblower could have a right to sue you personally for compensation in an employment tribunal.
- 6.4 However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

7. Contacts

Public Concern at Work (Independent whistleblowing charity)	Helpline: (020) 7404 6609 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk
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Schedule 6 Health and Safety Policy

1. Policy statement

- 1.1 We recognise our responsibilities under the Health and Safety at Work Act 1974, for ensuring so far as is reasonably practicable, the health, safety and welfare our staff and others that may be affected by the activities of the company. We regard the standards set by the various relevant statutory provisions as the minimum standard, which must be achieved, and will endeavour to improve upon these standards where reasonably practicable.
- 1.2 This policy sets out our arrangements for ensuring we meet our health and safety obligations to staff and anyone visiting our premises or affected by our work.
- 1.3 The Office Manager has day to day responsibility for health and safety matters in the workplace and the operation of this policy.

2. Your responsibilities

- 2.1 All staff share responsibility for achieving safe working conditions. You must take care of your own health and safety and that of others, observe applicable safety rules and follow instructions for the safe use of equipment.
- 2.2 You should report any health and safety concerns immediately to your line manager or to the Office Manager.
- 2.3 You must co-operate with managers on health and safety matters, including the investigation of any incident.
- 2.4 Failure to comply with this policy may be treated as misconduct and dealt with under our Disciplinary Procedure.

3. Training

- 3.1 We will ensure that you are given adequate training and supervision to perform your work competently and safely.
- 3.2 All new joiners will be given a health and safety induction and provided with appropriate safety training.

4. Equipment

- 4.1 You must use equipment in accordance with any instructions given to you. Any equipment fault or damage must immediately be reported to your line manager. Do not attempt to repair equipment unless trained to do so.

5. Accidents and first aid

- 5.1 Details of first aid facilities and the names of trained first aiders are displayed on the notice boards.

5.2 All accidents and injuries at work, however minor, should be reported to the Office Manager and recorded in the Accident Book which is kept in the Concierge Room.

6. Fire safety

6.1 All staff should familiarise themselves with the fire safety instructions, which are displayed on notice boards and near fire exits in the workplace.

6.2 If you hear a fire alarm, leave the building immediately by the nearest fire exit and go to the fire assembly point shown on the fire safety notices.

6.3 Fire drills will be held at least every 12 months and must be taken seriously. We also carry out regular fire risk assessments and regular checks of fire extinguishers, fire alarms, escape routes and emergency lighting.

7. Risk assessments and measures to control risk

7.1 We carry out general workplace risk assessments periodically. The purpose is to assess the risks to health and safety of employees, visitors and other third parties as a result of our activities, and to identify any measures that need to be taken to control those risks.

8. Computers and display screen equipment

8.1 If you use a computer screen or other display screen equipment (DSE) as a significant part of your work, you are entitled to a workstation assessment and regular eyesight tests by an optician at our expense.

8.2 Further information on workstation assessments, eye tests and the use of DSE can be obtained from HR.

9. Lone working

9.1 Lone working control measures are designed to safeguard you if you work alone either some or all of the time and you do not have colleagues in the vicinity to assist if an incident occurs, such as an act of violence, accident or health issue.

9.2 It is our policy that staff should:

- (a) ensure that their line manager (or HR if sensitive) is aware of any underlying medical condition which requires reasonable adjustments to be made or additional precautions to be taken in connection with lone working;
- (b) inform their line manager prior to attending the workplace outside usual working hours;
- (c) use the stairs in the office, not the lift, if you are alone in the building;
- (d) ensure that your mobile phone is charged, fully working and accessible at all times if lone working;
- (e) take any other reasonable precautions in the circumstances.

- 9.3 Line managers are responsible for identifying and minimising risks associated with those who are identified as lone workers within their teams and providing all necessary equipment and practical support.

Schedule 7 **Data Protection Policy**

1. Policy statement

- 1.1 Chancerygate is committed to transparent, lawful, and fair proportionate processing of personal data. This includes all personal data we process about our staff or those who work or interact with us.
- 1.2 This policy provides a framework for ensuring that we meet our obligations under the General Data Protection Regulations in the UK and EU (UK GDPR and EU GDPR) and the Data Protection Act 2018 (DPA 18).

2. Who must comply with this policy

- 2.1 This policy applies to all the processing of personal data carried out by the Chancerygate Group, including processing carried out by joint controllers and data processors.

3. What is personal data

- 3.1 The GDPR definition of "personal data" includes any information relating to an identified or identifiable natural living person. Pseudonymised personal data is covered by the legislation, however anonymised data is not regulated by the GDPR or DPA 18, providing the anonymisation has not been done in a reversible way.
- 3.2 Some personal data is more sensitive and is afforded more protection, this is information related to race or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data; biometric ID data; health data; sexual life and/or sexual orientation; and criminal data (convictions and offences).

4. Data protection principles

- 4.1 Chancerygate complies with data protection legislation guided by the six data protection principles. In summary, they require that personal data is:
 - (a) processed fairly, lawfully and in a transparent manner;
 - (b) used only for limited, specified stated purposes and not used or disclosed in any way incompatible with those purposes;
 - (c) adequate, relevant, and limited to what is necessary;
 - (d) accurate and, where necessary, up to date;
 - (e) not kept for longer than necessary; and
 - (f) kept safe and secure.
- 4.2 In addition, the accountability principle requires us to be able to evidence our compliance with the above six principles and make sure that we do not put individuals at risk because of processing their personal data. Failure to do so, can result in breach of legislation, reputational

damage, or financial implications due to fines. To meet our obligations, we put in place appropriate and effective measures to make sure we comply with data protection law.

5. Protecting Personal Data

- 5.1 We assign an owner to each category of personal information to ensure that the risk to personal data is identified and appropriately managed. The owner will be responsible for dealing with any subject access requests and other information rights requests, with the support of the Head of ESG, Legal Counsel and/or Chief Operating Officer as appropriate in the circumstances.
- 5.2 We publish a privacy notice on our website and track and make available any changes in our privacy notice. We also publish a staff privacy notice as part of our staff handbook and keep it up to date.
- 5.3 We require all staff to undertake mandatory training on data protection which they must repeat every year.
- 5.4 We have a procedure for reporting data breaches that is communicated to all staff. We assess whether we need to report breaches to the ICO (or equivalent body in other European countries) and we take appropriate action to make data subjects aware if needed.

6. Compliance

- 6.1 All staff are responsible for carrying out their work in compliance with this policy. Any queries, breaches or concerns relating to the policy should be reported to the Head of ESG.

Schedule 8 Anti-Money Laundering Policy

1. Policy Statement

- 1.1. We recognise our legal obligations to have procedures and controls in place to deter, disrupt and detect money laundering and terrorist financing and this document sets out our policy in relation to combating money laundering and terrorist financing.
- 1.2. We adopt a risk-based approach to the application of measures to prevent money laundering/terrorist financing. We are committed to conduct our business with a view to preventing exposure to any form of money laundering, to identifying potential areas where it may occur and to complying with all legal and regulatory requirements, in particular with regard to the reporting of actual or suspected cases.

2. What is Money Laundering?

- 2.1. Money laundering is the concealment of the origins of illegally obtained money, typically by means of transfers involving foreign banks or legitimate businesses. It is a collective term used for a number of offences involving the proceeds of crime or terrorism funds.
- 2.2. The money laundering regulations that are relevant to the Group include the Proceeds of Crime Act 2002 and the Terrorism Act 2000. Offences under these acts include:
 - (a) concealing, disguising, converting or transferring criminal property or removing it from England and Wales;
 - (b) arranging, or becoming concerned in an arrangement, which the person who knows, or suspects, or facilitates (by whatever means), the acquisition, retention, use or control of criminal property by or on behalf of another person;
 - (c) acquiring, using or having possession of criminal property; and
 - (d) entering into or becoming concerned in an arrangement which facilitates the retention or control by or on behalf of another person of terrorist property.

3. How to raise a concern

- 3.1. If you suspect money laundering you must report your concerns to the Chief Operating Officer as soon as possible. An individual will commit a criminal offence if they know or suspect, or have reasonable grounds to believe, that another person is engaged in money laundering and they do not disclose this. This may be an internal or external person.
- 3.2. You must follow the directions of the Chief Operating Officer and must not make any further enquiries, or take further steps in any related transaction without express authorisation from them.

- 3.3. You must not disclose your suspicions to the person suspected of money laundering. You must not discuss this with any other person and the referral must not be recorded on any document that the suspected person may see or have access to.
- 3.4. The Chief Operating Officer will evaluate any referral to determine whether it is necessary to be reported to the National Crime Agency (NCA). If so, it must be promptly reported.

4. Communication and awareness

- 4.1. Chancerygate will provide adequate resources and training on the risk our business faces from money laundering to ensure the successful application of this policy.
- 4.2. You must ensure that you read, understand, and comply with this policy, including the undertaking of mandatory training in a timely manner.

5. Breach

- 5.1. Any employee who breaches this policy will face disciplinary action which could result in dismissal for misconduct or gross misconduct.
- 5.2. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Schedule 9 Anti-Facilitation of Tax Evasion Policy

1. Policy statement

- 1.1 Chancerygate has a zero tolerance approach to all forms of tax evasion. Employees and those acting on behalf of the Chancerygate group must not undertake transactions which:
- (a) cause the group to commit a tax evasion offence; or
 - (b) facilitate a tax evasion offence by a third party.
- 1.2 The group is committed to acting professionally, fairly and with integrity in all of our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter tax evasion facilitation.

2. What is Tax Evasion and Tax Evasion Facilitation?

- 2.1 Tax evasion is a criminal offence under the UK Criminal Finances Act 2017, as well as potentially resulting in an unlimited fine, exclusion from tendering for public contracts and damage to our reputation.
- 2.2 **Tax evasion** means the offense of cheating the public revenue or fraudulently evading UK tax, and is a criminal offense. The offense requires an element of fraud, which means there must be deliberate action, or omission with dishonest intent.
- 2.3 **Foreign tax evasion** means evading tax in a foreign country, provided that conduct is an offense in that country and would be a criminal offense if committed in the UK. As with tax evasion, the element of fraud means there must be deliberate action, or omission with dishonest intent.
- 2.4 **Tax evasion facilitation** means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person, or aiding, abetting, counselling or procuring the commission of that offense. Tax evasion facilitation is a criminal offense, where it is done deliberately and dishonestly.

3. Compliance

- 3.1 All forms of tax evasion and tax evasion facilitation are strictly forbidden.
- 3.2 It is not acceptable for you (or someone on your behalf) to:
- (a) engage in any form of facilitating tax evasion or foreign tax evasion;
 - (b) aid, abet, counsel or procure the commission of a tax evasion offense or foreign tax evasion offense by another person;
 - (c) fail to promptly report any request or demand from any third party to facilitate the fraudulent evasion of tax (whether UK tax or tax in a foreign country), or any suspected fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person, in accordance with this policy;

- (d) threaten or retaliate against another individual who has refused to commit a tax evasion offense or a foreign tax evasion offense or who has raised concerns under this policy.

4. How to raise a concern

- 4.1 You are encouraged to raise concerns about any issue or suspicion of tax evasion or foreign tax evasion at the earliest possible stage.
- 4.2 If you become aware of any fraudulent evasion of tax in the course of your work, or you are asked to assist another person in their fraudulent evasion of tax (whether directly or indirectly), or if you believe or suspect that any fraudulent evasion of tax has occurred or may occur, you must notify your line manager or the Chief Operating Officer as soon as possible.

5. Communication and awareness

- 5.1 We will provide adequate resources and training on the risk our business faces from tax evasion for all individuals who work for us to ensure the successful application of this policy.

6. Breach

- 6.1 Any employee who breaches this policy will face disciplinary action which could result in dismissal for misconduct or gross misconduct.
- 6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Schedule 10 **Global Sanctions Policy**

1. **Policy statement**

- 1.1. Chancerygate is committed to carrying on business in accordance with the highest ethical standards. This includes complying with all applicable trade sanctions regulations (“**Sanctions Laws**”) in the countries in which we operate.

2. **What are Sanctions**

- 2.1. Sanctions are the regulatory restrictions applicable to dealings with certain countries/territories, governments, groups, entities, individuals or controlled goods or services.
- 2.2. Countries, companies and individuals may also be subject to sanctions, and these are as listed on the UK Government website (GOV.UK) and the official website of the European Union (https://www.eeas.europa.eu/eeas/european-union-sanctions_en).

3. **How to raise a concern**

- 3.1. All employees have the obligation to read and comply with this policy, to understand and identify any red flags that may arise and to escalate potential compliance concerns relating to sanctions to their line manager. You should not take any actions prior to receiving advice and/or instructions.

4. **Communication and awareness**

- 4.1. Chancerygate will provide adequate resources and training on the risk our business faces from sanctions to ensure the successful application of this policy.

5. **Breach**

- 5.1. Any employee who breaches this policy will face disciplinary action which could result in dismissal for misconduct or gross misconduct.
- 5.2. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Schedule 11 **Business Continuity and Disaster Recovery Policy**

1. Policy statement

- 1.1 The purpose of this policy is to establish a clear and effective framework for ensuring that Chancerygate can continue to operate critical business functions in the event of an unexpected disruption or disaster.
- 1.2 This policy outlines the objectives of Chancerygate in the event of a disruption and disaster and the procedures that have been put in place for the prevention, response, and recovery from events that may affect business operations, personnel and data security.

2. What does this policy cover?

- 2.1 This policy applies to all Chancerygate employees, offices, facilities, IT systems and financial operations.
- 2.2 The primary objectives of this policy are to:
 - (a) Ensure the safety and well-being of employees;
 - (b) Minimise downtime and the impact of disruptions to business operations;
 - (c) Protect critical data and assets from loss or corruption;
 - (d) Facilitate a swift recovery to normal operations following a disaster or significant disruption;
 - (e) Maintain compliance with applicable legal and regulatory requirements.

3. Office

- 3.1 In the event of an office disruption (such as a natural disaster, fire, or other physical incidents) Chancerygate will:
 - (a) **Ensure the availability of remote work solutions:** All staff are set up to be able to work from home/remotely. Chancerygate will initiate remote work procedures or, where necessary, relocate employees to alternate office space. Any scheduled in-person meetings can be held via Microsoft Teams.
 - (b) **Provide essential office equipment (e.g., phones and laptops) quickly:** Chancerygate maintains an inventory of essential office equipment and supplies and can send equipment to staff.
 - (c) **Communicate to all staff in the event of office closure or disruption:** The primary method of communication to employees will be via e-mail, with communication moving to mobile phones in the event that e-mails are adversely affected.

4. IT systems

4.1 In the event of any IT-related disruption (such as server or network failures, data breaches, software crashes, power outages etc.), Chancerygate will rely on the processes and procedures provided by its third-party IT service provider, Akita. These include:

- (a) **Data backup:** Akita manages regular backups of Chancerygate's critical data, ensuring that it is securely stored both on-site and off-site (cloud-based solutions). This ensures that in the event of data loss or system failure, data can be restored with minimal disruption.
- (b) **Disaster recovery plan:** Akita maintains a disaster recovery plan, tailored to Chancerygate's infrastructure. This plan includes procedures for the restoration of IT systems and applications.
- (c) **System redundancy:** Akita ensures that key IT systems, such as email servers, network infrastructure, and cloud applications, are set up with redundancy measures to minimise downtime and ensure high availability during disruptions.
- (d) **Cybersecurity:** Akita implements robust cybersecurity measures, including firewalls, intrusion detection systems, and regular security audits and recommendations, to protect Chancerygate's IT systems from cyberattacks that could disrupt operations or compromise data.
- (e) **Monitoring and reporting:** Akita provides continuous monitoring of Chancerygate's IT infrastructure via automate software to detect potential issues before they impact operations. They also provide regular reports on system performance and security status to keep management informed of the health of the IT environment.

4.2 In the event of a disruption, Akita's disaster recovery procedures will be immediately activated to restore critical IT systems and data. The Office Manager will coordinate with Akita to ensure the appropriate systems and data are prioritised for restoration. Once Akita has been notified (or, in the event that Akita first recognises a disruption has occurred), specialist engineers will be available immediately.

5. Key persons risk

5.1 In the event of absence of key personnel (for example, as a result of illness, emergency, external factors etc.) Chancerygate has in the place the following measures:

- (a) **Succession planning:** Chancerygate maintains a clear succession plan for key roles, ensuring a smooth transition if a key person is temporarily or permanently unavailable.
- (b) **Knowledge management:** Maintaining detailed documentation via sharepoint of key processes, decisions and project statuses, ensuring that essential information is accessible to others within Chancerygate.

- (c) **Communication with employees:** Establish clear lines of communication to ensure management and employees are informed and able to take appropriate actions.

6. Bank accounts / accounting software

6.1 If Chancerygate experiences any issues with its financial systems, including bank accounts and accounting software (such as technical issues with bank's online platform, administrative errors, software system failures etc), Chancerygate will seek to minimise disruption by:

- (a) **Carrying out access control:** Access to bank accounts and accounting software is limited to authorised personnel only.
- (b) **Utilising cloud-based accounting software:** Where possible, Chancerygate will use cloud-based accounting software to enable access from alternative locations if necessary.
- (c) **Ensuring bank account continuity:** It is possible that authorised personnel can access and manage bank accounts remotely in the event of office closure or personnel unavailability. Online platforms can be accessed remotely and in accordance to the bank mandate and permissions.
- (d) **Carrying out regular backups:** Chancerygate regularly backs up accounting data, including transaction history and financial reports, to prevent data loss during a disaster.

Schedule 12 Procurement Policy

1. Policy statement

1.1 Chancerygate is committed to conducting our business with the aim of creating optimal returns for our investors and minimising our risks. As an industry leader and a responsible business, we also promote the highest standards for sustainability, ethics and business conduct. Our relationship with our suppliers is critical to achieving these aims.

1.2 This policy sets out how Chancerygate will carry out the procurement of goods, works and services from our supply chain. It applies to all procurement undertaken by Chancerygate, including procurement relating to our developments, investment and asset management and the management of our offices.

2. Our Approach

2.1 We will carry out procurement in accordance with the following principles:

- (a) We will assess and the review the risks associated with each procurement to select the most appropriate procurement route and where needed include due diligence, contractual conditions and performance monitoring to mitigate any risks.
- (b) We will only work with suppliers who have the necessary capability and demonstrate high levels of performance.
- (c) We will seek to maximise best value for money by undertaking competitive tendering where this is proportionate.
- (d) We will only do business with suppliers who agree to meet our ethical and sustainability standards which are set out in our Supplier Code of Conduct.

2.2 More details are set out in our procurement procedures which must be applied on a case by case basis.

3. Compliance with the Policy

3.1 All staff who carry out procurement are responsible for compliance with this policy and with our procurement processes. Any queries and concerns should be directed to the Head of ESG.

Schedule 13 Tenant Screening Policy

1. Policy statement

1.1 This document sets out our policy in relation to screening of tenants of properties that we own or manage.

2. Our Approach

2.1 Chancerygate is committed to incorporating environmental, social and governance (ESG) factors across all of the Group's business dealings and relationships to deliver long term sustainability and social value.

2.2 There are specific sectors and economic activities where we consider the sustainability risks to the climate, planet and people are so severe, that entering into tenancy agreements with them is misaligned with our principles.

2.3 We will undertake tenant screening on all new primary lease agreements based on ESG grounds to identify occupiers undertaking activities that may have a material ESG risk. Where tenant business activities fall into high risk categories, a referral will be made to the Board to determine suitability based on a review the ESG risks to Chancerygate and our Stakeholders. Joint venture investors will also be consulted on these decisions.

2.4 Tenant screening will also be undertaken in accordance with our Anti-Money Laundering Policy and our Global Sanctions Policy.

3. Risk Categories

3.1 We consider all potential occupiers on a case by case basis and any guidelines listed here are non exhaustive.

3.2 Tenants involved in the production, operation, trade, or sale of any the following are considered to be of the highest risk categories and will generally be excluded:

- (a) Indiscriminate weaponry
- (b) Pornography
- (c) Noxious substances, pollutants or those otherwise adversely associated with climate change (in respect of revenue from tar sands or thermal coal)
- (d) Illegal drugs or cannabis

3.3 Tenants involved in the production, operation, trade, or sale of any the following are considered to be of high risk categories and will generally be the subject of additional scrutiny:

- (a) Conventional weaponry (including firearms)
- (b) Tobacco and related products
- (c) High-interest Lending
- (d) Gambling

4. We recognise that some investors may also wish to avoid other activities, including for example additional environmental, religious or ethical concerns. Where appropriate, these will be taken into account.
5. **Compliance with the Policy**
 - 5.1 All staff who are responsible for identifying tenants are responsible for carrying out screening in accordance with this policy, and notifying the board of any tenants in any of the risk categories. Any queries should be directed to the Head of ESG.

Schedule 14 **Environmental Social and Governance (ESG) Policy**

1. Policy statement

1.1 Chancerygate is committed to incorporating ESG factors across all of our business dealings and relationships, to deliver long term sustainability and social value. The company is committed to continual improvement in ESG performance.

2. What is ESG?

2.1 ESG relates to the business's impact on the environment and society as well as how robust and transparent its governance is.

2.2 Chancerygate has carried out a materiality analysis to determine the most important ESG issues for the business to focus on. This includes both how Chancerygate's actions impact on people and the planet, but also how sustainability issues could affect the company's financial-wellbeing.

2.3 The material issues include:

Environment:

- (a) Reducing operational and embodied carbon emissions
- (b) Transitioning to renewable energy uses
- (c) Resilience to climate change
- (d) Biodiversity and urban greening
- (e) Circular economy and waste
- (f) Responsible water management

Social:

- (a) Health, safety and wellbeing
- (b) Diversity, Equity & Inclusion
- (c) Social value in local communities

Governance:

- (a) Corporate governance and ethical business
- (b) Human rights and modern slavery
- (c) Transparency and data management
- (d) Sustainable Supply chains

3. Incorporation of ESG Factors

- 3.1 Chancerygate will engage with our partners and relevant stakeholders to ensure that the environmental and social performance of our developments and managed assets are optimised within the bounds of what is commercially viable.
- 3.2 Our approach to ESG will be discussed regularly in our board meetings and investment decisions will be reviewed to ensure ESG risks & opportunities are identified and mitigated.
- 3.3 Our commitment to ESG will be communicated to all our contractors, suppliers and other business partners via a supplier code of conduct at the outset of our business relationship with them and reinforced as appropriate thereafter.

4. Responsibilities

- 4.1 The Board maintains oversight of alignment of ESG with business strategy and responsibility for ESG risks and opportunities at a strategic level. The Board has ultimate responsibility for defining the ESG strategy and targets, this includes responsibility for ESG related risks and opportunities to the business.
- 4.2 The ESG committee, comprising a cross-functional management team, drives the development and implementation of the ESG strategy. As part of continual improvement, the committee will identify, develop and implement processes to manage the principal ESG risks and opportunities.
- 4.3 Team leaders at all levels within the Group are responsible for ensuring those reporting to them understand and comply with this policy and receive regular training on ESG.
- 4.4 Employees are responsible for considering ESG factors in their decisions, and raising any issues to their line manager. Any queries should be directed to the Head of ESG.

Schedule 15 **Conflicts of Interest Policy**

1. Policy statement

- 1.1 Chancerygate recognises the importance of good governance, including procedures and controls to prevent, monitor and manage potential conflicts of interest amongst its directors and employees. The purpose of this policy is to set out Chancerygate's approach to identifying, preventing and managing conflicts of interest, as well as setting out the arrangements to clearly document potential conflicts of interest.

2. What is a conflict of interest?

- 2.1 A conflict of interest is a situation where one or more persons or entities have competing interests, and serving one interest involves potential detriment to another.

Directors

- 2.2 A director's conflict of interest is a situation in which a company director has an interest, either direct or indirect, that conflicts, or may conflict, with those of the company. Directors have a duty to manage conflicts of interest under the Companies Act 2006 and must take responsibility to prevent any external interests from impairing their ability to make objective, unbiased business decisions while carrying out their duties.

Employees

- 2.3 For employees, a conflict of interest may arise where an employee's personal interests are at odds with the company they work for. Examples of conflicts of interest include situations where a member of staff:

- (a) is likely to make a financial gain, or avoid a financial loss, at the expense of the company;
- (b) has an interest in the outcome of a service provided in respect of a transaction, which is distinct from the company's interest in that outcome;
- (c) has a financial interest or other incentive to favour one third-party service provider over the interests of another third-party service provider;
- (d) carries on the same business as the company;
- (e) has a relationship with any related party; or
- (f) receives or will receive from a person or company an inducement in relation to a service provided to the company, in the form of monies, goods or services, other than the standard commission or fee for that service.

Commercial

- 2.4 Whilst we endeavour to avoid any conflicts of interest during the course of our business dealings, it is possible that these will arise, for example where we own or manage assets with similar sized units in reasonably close proximity to each other which, in the case of development sites, reach (or are expected to reach) practical completion at a similar time.

3. Approach to conflicts management

3.1 Chancerygate maintains and operates organisational and administrative arrangements to prevent conflicts of interest from adversely affecting the business. This is achieved through the identification, prevention and management of conflicts.

Directors

3.2 Upon appointment each Director of Chancerygate will complete a Declaration of Interests form, which will be updated annually.

3.3 Each Director is responsible for assessing whether they have or may have a potential conflict of interest and, if so, informing the Board.

3.4 Where a conflict of interest is notified to the Board, the Board will decide, on a case by case basis, whether the interest can be authorised or whether any further action needs to be undertaken, which may include an individual Director being excluded from specific board meetings or decisions.

Employees

3.5 Where an employee believes they have identified an actual or potential conflict of interest, they are required to report to both their line manager and to the Chief Operating Officer who will determine what action needs to be taken.

3.6 A record will be kept of all declared conflicts of interest.

3.7 All employees are expected to proactively escalate to their line manager and to the Chief Operating Officer any actual or potential personal or business conflicts they identify. By signing the annual declaration of adherence with these policies, employees confirm that they have no conflict or related party interest which has not been declared.

Commercial

3.8 To ensure that potential conflicts are proactively identified, existing and pipeline work in progress will be considered:

- (a) at weekly meetings within the DM and AM teams; and
- (b) at monthly cross departmental meetings.

3.9 Sites will be resourced appropriately to manage conflicts, including:

- (a) appointment of different agents on different schemes/estates;
- (b) use of information barriers;
- (c) allocation or reallocation of responsibility internally.

3.10 Any conflicts or potential conflicts of interest which are identified will be communicated without delay to any partner or stakeholder who may be affected, to ensure transparency and clarity of approach.

4. Compliance

- 4.1 Compliance with this policy is the responsibility of each individual Director or member of staff. Any queries, breaches or concerns relating to the policy should be reported to the Chief Operating Officer.

Schedule 16 Safeguarding Policy

1. Policy statement

- 1.1 Although the Group does not engage in any regular activities with children, young people or adults at risk, from time to time people working for us or on our behalf may engage with these groups, for example by offering work experience or when taking part in volunteering activities on behalf of the Group.
- 1.2 The purpose of this policy is to protect children, young people and adults at risk who our staff engage with and to provide our staff with the overarching principles that guide our approach.

2. Legal and Policy Background

- 2.1 This policy has been drawn up based on legislation, policy and guidance that seeks to protect children, young people and adults at risk in the United Kingdom.
- 2.2 There is no single legal definition of safeguarding. There are certain specific meanings in specific situations. Chancerygate defines safeguarding as:
- (a) Creating a safe and welcoming environment, where everyone is respected and valued.
 - (b) Making sure the company is run in a way that actively prevents harm, harassment, bullying, abuse and neglect.
 - (c) Being ready to respond to any safeguarding issues that arise.

3. Safeguarding Policy Statement

- 3.1 Chancerygate recognises that providing opportunities such as work experience, careers advice or careers-based activities to children and young people is an excellent opportunity to help them develop new skills and gain valuable knowledge about the world of work. Chancerygate recognises the value that can be delivered by volunteering.
- 3.2 We are committed to ensuring a safe and supportive environment for children, young people and adults at risk and to keeping them safe from harm. It is our intention that volunteering activities provided by the Group are safe, positive, and fulfilling experiences for everyone involved.
- 3.3 We will safeguard children, young people and adults at risk by:
- (a) Valuing, listening to and respecting them.
 - (b) Adopting safeguarding best practices through our policies, procedures and good practice guide.
 - (c) Ensuring that all staff know about and follow our policies, procedures and good practice guidance and providing support to them as required.

- (d) Recording, storing and using information professionally and securely, in line with data protection legislation and guidance (more information about this is available from the Information Commissioner's Office: ico.org.uk/fororganisations).
- (e) Making sure that children, young people and their families know where to go for help if they have a concern or complaint.
- (f) Using our procedures to manage any allegations against staff appropriately.
- (g) Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise.
- (h) Ensuring that we have effective complaints and whistleblowing measures in place.
- (i) Building a safeguarding culture where staff, children, young people and their families, treat each other with respect and are comfortable about sharing concerns.

4. Compliance with the Policy

4.1 The Head of ESG has primary responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it and reviewing internal control systems and procedures to ensure they are effective in providing safeguarding for children, young people and adults at risk.

4.2 All staff are responsible for:

- (a) following procedures and good practice in accordance with this policy;
- (b) raising any concerns they may have about the welfare of a child, young person or adult at risk immediately with the Head of ESG. If this person is not available then you should seek advice from the Chief Operating Officer;
- (c) maintaining confidentiality for everyone that is concerned with any concerns or complaints. Information should be handled on a need-to-know basis only. All information should be stored in a secure place with limited access to designated people, in line with data protection laws.