

Media Relation Policy

Purpose

SGC Holdings Ltd trading as SGC Security Services (“SGC”) aims to work constructively and transparently with the media to ensure that information of public interest is communicated accurately, responsibly, and in a timely manner.

This policy sets out how media enquiries are handled and who is authorised to speak on behalf of the Company.

Media Management and Spokespersons

SGC’s Director is designated as the Company’s Public Information Officer (“PIO”) and is responsible for the implementation of this policy.

Where the PIO is unavailable, they will appoint an authorised spokesperson to act on their behalf.

Only the PIO or an authorised spokesperson may make statements to the media on behalf of SGC.

Handling Media Enquiries

All media enquiries must be treated professionally, courteously, and promptly.

Any employee who receives a media enquiry must:

- refrain from making any comment; and
- immediately refer the enquiry to their line manager, who will notify the PIO without delay.

Media enquiries are given a high priority, and every reasonable effort will be made to meet deadlines while ensuring that all information released is accurate, complete, and approved.

Where information is required to respond to a media enquiry, relevant managers must provide the PIO with accurate and complete information as soon as reasonably practicable.

The PIO may delegate subject-specific responses to an authorised spokesperson where specialist knowledge is required.

Records and Information Requests

Media requests for records or information will be handled in accordance with:

- the UK General Data Protection Regulation (UK GDPR);
- the Data Protection Act 2018; and
- SGC's Data Protection and Information Security policies.

All media records requests must be referred to the PIO.

Where requests involve personnel or personal data, the PIO will liaise with the HR Manager, who is the designated custodian of employee records.

Only information that may lawfully be disclosed will be released. Confidential, personal, or sensitive information will not be disclosed unless legally required.

Personal Views and Public Commentary

SGC recognises employees' rights to express personal views on matters of public interest.

However, employees must not present personal opinions as representing the views of SGC.

Employees must:

- not use SGC stationery, branding, or official contact details when expressing personal views;
- include a clear disclaimer if identifying themselves as an SGC employee, stating that the views expressed are personal and do not represent the Company; and
- make the same clarification when speaking at public meetings, participating in media discussions, or engaging on social media, unless formally authorised as a Company spokesperson.

SGC-Initiated Media Communications

All proactive media activity on behalf of SGC, including:

- press releases;
- media briefings; and
- direct contact with journalists or editors,

must be coordinated through the PIO.

Departments seeking publicity for Company activities or events must liaise with the PIO to ensure consistency, accuracy, and compliance with legal and reputational requirements.

Public Safety and Security-Related Matters

Where media enquiries relate to:

- security incidents;
- criminal investigations; or
- matters involving law enforcement,

the PIO will coordinate responses with the appropriate external authorities and ensure that disclosures do not prejudice investigations or breach legal obligations.

No employee may release information relating to incidents, investigations, or security operations without authorisation.

Crisis and Emergency Communications

In the event of a crisis or major incident, media communications will be managed in accordance with SGC's Crisis Communications Plan.


The PIO will act as the primary point of contact for all media communications and will coordinate approved messaging, supported by designated alternates where necessary.

Compliance

Failure to comply with this policy may result in disciplinary action.

This policy will be reviewed periodically to ensure it remains appropriate, effective, and compliant with legal and regulatory requirements.

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| Name | Paul Macarthur | Position | Managing Director |
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| Signature |  | Date | 14/01/2026 |