

GARDAWORLD CODE OF BUSINESS ETHICS AND STANDARDS OF CONDUCT STATEMENT OF CONFORMANCE

1. GardaWorld International Protective Services provides security services in circumstances where weakened governance creates complex, fragile and hostile environments. Our clients, host nation and home governments, the communities within which we operate, our partners and our suppliers rely on us to operate in a responsible manner that enhances human safety and security and which protects assets (both tangible and intangible) while conforming to international law, local laws and human rights.
2. Every aspect of our business practice and service delivery is governed by our **Code of Business Ethics and Standards of Conduct** and our corporate **Business Management System (BMS)**. These are founded upon our commitment to respecting human rights and follow the principles of '**Protect, Respect and Remedy**'¹. In order to demonstrate our credibility in applying these principles we ensure that our entire way of doing business is externally accredited, on a global basis, to a number of International Standards² which encompass the full scope of our business functions and services.
3. In complex operating environments a State's own ability to **protect** human rights may be diminished. Other states and parties may also be known or suspected of acting in a way which has an adverse impact on human rights. In these circumstances, our rigorous application of the principles enshrined in our Code of Business Ethics and Standards of Conduct assists us in minimising the risk of our own actions causing adverse impacts upon human rights.
4. We **respect** our people, clients and the communities within which we operate by acting upon firmly held, communicated and administered principles of fairness, equality, integrity and dignity. Our responsible approach, operating our BMS within our robust Legal Operating Framework, includes:
 - a. Using a formal, enterprise-wide procedure for the management of internal and external risk, applied to all aspects of our business processes and decision-making, at all levels (Fully compliant with ISO 31000 and ISO 22301).
 - b. Applying a rigorous, fair and risk-based process for the selection, recruitment and vetting of our people, our partners, our suppliers and, where appropriate, our clients.
 - c. Providing the healthiest and safest working environment possible for all of our people, wherever they are and whatever duties and responsibilities are assigned to them (Externally certified to OHSAS 18001, covering all of our operations globally).
 - d. Promoting and maintaining the assurance of quality of service across all of our business processes and services (Externally certified to ISO 9001, PSC.1 and ISO 18788 covering all of our operations globally).
 - e. Managing and reducing potential impacts of our business operations on the human, built and natural environment around us (Externally certified to ISO 14001, covering all of our operations globally).
 - f. When risks are realised and disruptions occur, protecting our stakeholders by ensuring that we are prepared, rehearsed and ready to respond rapidly and coherently to

¹ Our code is founded upon the UN Guiding Principles on Business and Human Rights, the International Code of Conduct for Private Security Service Providers (ICOC), the Montreux Document and all applicable local, national and international laws and regulations. We are a founding signatory of the ICOC.

² ISO 18788:2015, ANSI/ASIS PSC1-2012, ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018.

resolve the impacts and restore stability, regardless of the levels of scale or complexity. (Fully compliant with ISO 22301, globally).

- g. Embedding a culture of professional excellence through coherent, progressive and accredited programmes of training, education and talent management for all of our people, across all business disciplines and at all levels (Training and development is accredited by RoSPA, Edexcel and Highfield).
- h. Diligently assessing and demanding compliance with the International Code of Conduct for Private Security Providers and the UN's Guiding Principles when selecting potential clients, associates, suppliers, partners and contractors.
- i. Employing, contracting and fairly reimbursing all of our personnel and suppliers in accordance with laws, regulations and standards applicable in each and every country of operation.
- j. Monitoring and auditing our business transactions and activities in accordance with strict rules and processes to ensure prudence and probity in all of our business relationships
- k. Firmly rejecting and condemning and having systems in place to avoid all forms of bribery and corrupt and fraudulent practice by our people at all levels and in all countries of operation.
- l. Adhering to applicable rules and regulations pertaining to the procurement, import and export of goods required for the delivery of our services.
- m. Ensuring and respecting freedom of expression in matters of faith, gender, culture and heritage in all aspects of our business.
- n. Through our service delivery, facilitating freedom of movement for our clients and other key stakeholders within the countries, regions and communities wherein we operate.
- o. Through the employment, professional development and contracting of services of individuals and groups within our local communities, we shall contribute to growth, stability and sustainability of these communities.
- p. Enhancing the quality of lives in the communities around us by providing social assistance programmes, cognisant of social, faith and cultural sensitivities and associated risks.

5. In the event that a disruptive or undesirable event³ occurs, we manage the full range of resulting impacts, minimising adverse effects and restoring our services, rapidly and seamlessly (Fully compliant with ISO 22301, covering all of our operations globally). Where these incidents involve an adverse impact on human rights, we will take all possible steps to **remedy** these through both judicial⁴ and non-judicial processes, specifically:

- a. We operate a formal process for receiving and responding to internal and external grievances. Where confidentiality is needed, a whistle-blower procedure is employed.

³ Any event that has the potential to cause loss of life, loss or damage to our assets/revenue or those of our clients, degradation of our corporate reputation and that of our clients or which negatively impacts upon human rights and fundamental freedoms of internal or external stakeholders.

⁴ Judicial Process here refers to due process in accordance with international law and the laws of the countries within which we operate, as defined in the operating licenses and other applicable agreements to which we subscribe.

- b. The Company maintains a fair and robust formal disciplinary process which is employed when the Company’s Code of Business Ethics and Standards of Conduct is contravened.
 - c. We submit to due legal process where a judicial solution is required.
6. We learn lessons from these events and continually improve our performance through performance evaluation processes that have been certified as effective by external auditors.
7. All of our personnel and tiers of management are formally allocated responsibility and accountability for the management of risk, assurance of quality and adherence to the values and standards covered within this statement.
8. The Senior Leadership Team, supported by the Oversight Board, are responsible for providing top management direction, guidance and the moral and physical resources to enable these levels of responsible governance and compliance to be met and sustained.
9. If you wish to explore any aspect of this statement further, please enquire through your existing account manager or by email through: gwinfo@garda.com
10. If you wish to express a grievance of any kind, confidentially or otherwise, please contact gwethics@garda.com or submit your concern through the compliance page on our website.

Signed:



Oliver Westmacott
President & Chief Operating Officer

Dated: 18th April 2019