

Introduction

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 (the “Act”) for the financial year ending 31 January 2019. It sets out the steps that we have taken to identify and reduce the risk of modern slavery occurring within our business operations and/or our supply chain and demonstrates GardaWorld Security Corporation’s (‘GardaWorld’) commitment to continually improve its practices to combat slavery and human trafficking.

Organisation Structure and Business

GardaWorld Security Corporation is headquartered in Montreal, Canada and is one of the world’s largest privately-owned security company. It is divided into various business divisions comprising: Cash Services, Security Services – Canada, Security Services – US, and Security Services – Middle East & Africa. GardaWorld is a provider of security and risk management solutions in over 45 countries around the world.

GardaWorld’s UK subsidiaries required to report under the Act are members of the Security Services – Middle East and Africa Division (GardaWorld SS-MEA):

GardaWorld Consulting (UK) Limited, Company No: 09629915, Registered Address: The St Botolph Building, 138, Houndsditch, London, EC3A 7AR

GW Consulting (UK) Limited, Company No: 5079338, Registered Address: Two London Bridge, London SE1 9BG and Aegis Defence Services Limited (ADSL) also t/a GardaWorld, Company No: 4341965, Registered Address: Two London Bridge, London SE1 9BG

NYA International Limited, Company No. 07612902, Registered Address: Two London Bridge, London, SE1 9RA

This statement is made by GW Consulting (UK) Limited on behalf of itself, its subsidiaries, including ADSL and its affiliates including GardaWorld Consulting (UK) Limited and NYA International Limited.

Supply Chains and Key Policies

GardaWorld Security Services - Middle East & Africa (SS-MEA) supply chain relates to both the purchase of goods or services for internal use and also the purchase of goods or services procured in order to fulfil customer contracts. We have over 30 preferred suppliers who support GardaWorld SS-MEA operations, providing goods and services such as professional services, labour recruitment and management, uniforms, IT, vehicles, catering and security equipment and in some instances security services.

GardaWorld SS-MEA is committed to ensure that there is no modern slavery or human trafficking in its supply chains (where it is envisaged the greatest risk of modern slavery and human trafficking may occur) or in any part of its business. Key codes and policies reflect its commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains. Below is a brief summary of key codes and policies which direct the implementation of this desired method of conducting operations.

- **Code**

The GardaWorld SS-MEA Code of Business Ethics and Standards of Conduct, the “Code” sets out the requirements and expectations with respect to key areas of responsible sourcing, including respect of international human rights standards and the prohibition of forced or coerced labour. All suppliers are expected to comply with the principles set out in the Code. They are expected to ensure that the obligations set out in the Code are met or that there is a clear timeline for full implementation within their own organisation and their associated suppliers and subcontractors. Third parties are required to sign an associate certification confirming their compliance with applicable laws and the Code.

The Code includes an express provision on the prohibition of human trafficking.

- ***Human Rights, Modern Slavery and US Combatting Trafficking in Persons***

The respect for and protection of human rights is central to the way in which GardaWorld SS-MEA conducts its business. The GardaWorld SS-MEA policy on Human Rights and Professional Standards deals with respect for human rights including modern slavery and human trafficking with a Human Rights Impact Analysis conducted covering each region which GardaWorld SS-MEA operates and capturing human rights risks from the projects that we deliver.

This comprehensive human rights policy and risk assessment procedure, supported by our due diligence procedures for suppliers and strategic service providers, pay attention to matters related to human trafficking. The procurement policy ensures that all new vendors are assessed (which assessment extends to human trafficking), in order to ensure compliance with GardaWorld SS-MEA's applicable policies and procedures.

The employment of migrant labour is occasionally necessary when the availability of appropriately skilled local labour is scarce, or in order to meet specific client contract requirements (specifically on government and diplomatic contracts in complex, high threat environments). GardaWorld SS-MEA recognises that in seeking better work opportunities and livelihoods for their families and future, migrant workers are often outside the legal protection of their countries of national origin, which can make them vulnerable to abuse and exploitation. GardaWorld SS-MEA has stringent provisions on anti-trafficking and training is provided to all staff. Policies are based upon the principles derived from protection and respect of human rights and the requirements of the US Combating-Trafficking in Persons regulations. Policies cover the use of recruitment agencies, accommodation standards and provide clear employment terms and conditions to help protect all staff (including those who are working away from their home country and the legal protections that this should otherwise provide them). Employment is freely chosen with no use of forced, compulsory, bonded, indentured or child labour. All staff, including migrant workers are offered roles under terms which have due regard to their health and safety, equality and dignity. Policies are developed to safeguard migrant workers from unscrupulous recruitment practices and help to prevent and manage any risks arising from their employment.

- ***Whistle-blowing***

GardaWorld SS-MEA believes the best way of maximizing the potential of individuals is to create a work place environment where employees are valued and able to perform to their fullest potential. Minimizing workplace conflict is essential to this process, GardaWorld is therefore fully supportive of our employees who wish to raise concerns or questions regarding the performance of their duties.

To encourage transparency GardaWorld SS-MEA has a whistle-blowing policy, which includes provisions permitting anonymous reporting, briefed as part of on-boarding and pre-deployment training, with the policy available on the company website, Egnyte (our secure content platform for file storage and retrieval) and held in hard copy at those locations where access to a computer may not be so readily available. Such policies also ensure effective policing from internal sources, providing an even more comprehensive deterrent to any practices of modern slavery and trafficking. The whistle-blowing policy is available via the GardaWorld website for all third parties to access. Employees and contractors are encouraged to raise concerns through their management. If a concern relates to their manager, the HR Senior Manager's details are listed on the policy, as well as an email address and hotline number. Once a complaint has been received, investigations are conducted internally and whistle-blowers are kept up to date as their complaint progresses. Disciplinary action may arise from a whistle-blowing complaint. The General Counsel and the Director of Compliance and Assurance will generally decide how to act in relation to a reported incident, although the Oversight Board of GardaWorld SS-MEA may be asked to review and decide in particular circumstances such as where a conflict of interest would prevent a fair and unbiased investigation. Whistleblowing complaints are also reported to GardaWorld SS-MEA's Oversight Board semi-annually, and to GardaWorld Security Corporation's Governance Committee on a quarterly basis.

Whistle-blowers are entitled to submit anonymous concerns under the strictest level of confidence. Under no circumstances is a whistle blower at risk of retaliation from GardaWorld.

- **Grievance procedure**

GardaWorld SS-MEA implements a comprehensive grievance mechanism. Grievances from all parties whether internal, external, individuals or companies via email, our hotline or a submission of an online form available on our website, are dealt with through the complaints handling system.

Once received the complaints handler logs the complaint in a database and categorises the complaint as either employee, customer, subcontractor, external or whistle-blowing. The complaints handler works closely with the legal team and ensures all complaints are acknowledged within five working days and closes out complaints as soon as possible. If a complainant is not content with the outcome of a complaint they have the right to appeal. The Oversight Board oversees all complaints. The Oversight Board meets semi-annually to discuss any concerns that may have been raised.. The Oversight Board provides corporate governance at the highest level of business operations reviewing practices, specific issues of relevance, and analysing the data within the business to assess performance and trends (including recruitment, incident, audit data, etc.).

The procedures described above mitigate the risk of slavery and human trafficking.

Due Diligence and Supplier Adherence to GardaWorld's Values

GardaWorld SS-MEA has zero tolerance to slavery and human trafficking. To ensure all those in its supply chain and its contractors adhere to company values there is a rigorous supply chain compliance programme.

GardaWorld SS-MEA reserves the right to audit any of its suppliers and their subcontractors to confirm that the requirements set out in GW-COR-PUR-FOR-019 Vendor prequalification and GW-COR-PUR-FOR-021 Vendor assessment/risk rating forms (as a form of due diligence) have been met. Suppliers confirm that any failure to allow an audit may result in the termination of any supply contract. If an audit identifies levels of noncompliance with the Code or the supply contract, the supplier will be required to provide a detailed remedial action plan. If the supplier refuses to comply with the action plan GardaWorld SS-MEA is likely to terminate the relationship.

In addition, and in support of this requirement there is an internal audit system (to provide assurance of):

- regional management audits of every project (Every Six Months)
- internal audit (a minimum of one every 18 months) on each region including projects by the Compliance and Assurance Team
- oversight of the audit processes by the Oversight Board to ensure adherence to the GardaWorld standards and maintaining focus on the key risks to our business.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and the business, GardaWorld SS-MEA provides training to staff, highlighting these matters in the conduct of business. This training takes the form of online courses featuring multiple choice questions at the conclusion of each module, which are required to be completed in order to successfully complete the training, together with training presentations being delivered. Training is provided to all new starters (cascaded through the business) and then refreshed on an annual basis.

Effectiveness in Combatting Slavery and Human Trafficking

GardaWorld SS-MEA has an integrated business management system which is independently certified to ANSI/ASIS PSC.1-2012 standard, as well as being awarded ISO 18788:2015, OHSAS 18001:2007, ISO 14001:2015 and ISO 9001:2015 by a UKAS accredited certification body.

The standards ANSI/ASIS PSC1-2012 and ISO 18788:2015 contain specific requirements for a business to demonstrate that it complies with all pertinent legal obligations and effectively mitigates any risk of slavery and/or

human trafficking. External certification requires regular and independent audit of working practices, policies, procedures and training thereby providing further assurance of the reduced risk of slavery and human trafficking.

Further Steps

In our previous statement, we advised that, in order to ensure the residual risk of human trafficking and modern slavery in our supply chains is minimized, we would: (i) further enhance our supplier due diligence process; (ii) conduct more frequent audits and continual checks of supplier due diligence results and risk status to confirm continued compliance; and (iii) develop an overall supplier code (based upon the principles of the Code), to provide a specific framework when engaging suppliers.

During this period we have taken significant steps to meet our commitments, including, but not limited to:

- (i) significantly enhancing our supplier due diligence process, implementing a new three tier due diligence system, and requiring all higher risk suppliers, including labour recruitment and management providers to be subject to external due diligence investigation;
- (ii) revising our internal audit program to provide for an audit, an advisory visit, and a remote health check on each of our operations and projects every 18 months, thereby increasing our audit touch-points three-fold, while using new tools (such as iAuditor) to increase efficiency of audits, and focusing in on human rights, human trafficking and modern slavery risks and how they are being assessed, mitigated and monitored in our operations and on our projects;
- (iii) finalizing the draft of a new supplier code of conduct, which will be rolled out imminently;
- (iv) participating in significant industry initiatives, including contributing to the development of the International Code of Conduct Association's Guidelines on the Prevention of Sexual Exploitation, and participating in the technical committees and working groups for the review of PSC.1 and the development of PSC.2 to ensure the highest standards (including in respect of human rights generally) in the private security industry are established and maintained;
- (v) refreshing our Oversight Board to ensure that sufficient focus and attention is provided to the key ethics and integrity issues facing our business, and establishing a Business and Human Rights Working Group of our Oversight Board charged with responsibility for exercising oversight, and for ensuring that the key risks to human rights from our activities, including the risks of human trafficking and modern slavery are properly identified, assessed, mitigated, and continuously monitored within the Protect, Respect, and Remedy framework;
- (vi) launching a significant project to vertically integrate our migrant labour recruitment and management within the Company;
- (vii) continuing to integrate a significant number of acquisitions in East Africa, bringing them under our business management system, implementing our policies, procedures, instructions and processes consistently, and ensuring effective corporate oversight;
- (viii) continuously engaging with unions and regulatory authorities in East Africa on fair labour standards, including agreeing a new collective bargaining agreement with the Kenyan National Private Security Workers Union, demonstrating our commitment to fair labour practices in Kenya, and engaging with the Kenyan Protective Security Regulatory Authority in Kenya in respect of enforcement of minimum wage for security officers in the country.
- (ix) Embedding our principles and management systems across all new companies that we acquire, ensuring the implementation of our standards and the provision of coaching and mentoring to ensure clear understanding of the importance of implementation. All new acquisitions undergo internal audits with external UKAS accredited auditors conducting an extension of scope audit, normally within 6 to 9 months of the acquisition being completed.

Modern Slavery Act 2015, section 54 statement

In the year ahead we will focus on embedding these achievements within our operations, and incrementally improving our systems and processes to ensure we meet our commitments to all our stakeholders.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes on behalf of Garda World Security Corporation and GardaWorld Consulting (UK) Limited and all other subsidiaries on slavery and human trafficking statement for the financial year ending 31 January 2019.

Oliver Westmacott President and COO

For and on behalf of GW Consulting (UK) Limited

Date: 17 September 2019