

FAQ – Ethics Hotline

Doing the right thing

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What is an ethics hotline?

An ethics hotline enables a person to alert GardaWorld anonymously about something that might not be in line with the law, organisational values or ethics guiding principles, and that may affect the operations and reputation of our organisation.

Who can use the ethics hotline?

Anyone.

All GardaWorld employees and security professionals, clients, suppliers, business partners, subcontractors, investors, and the general public.

Why should I report suspected or witnessed misconduct?

Denouncing misconduct is important for fostering high ethical standards and maintaining our clients' and the public's trust in our organisation and its operations.

Reporting these events can contribute to preventing ongoing or future misconduct.

How is my anonymity ensured?

We use an independent, third-party service provider's platform called Convercent. It establishes anonymous communication between you and the individuals receiving the messages.

- The service is separate from GardaWorld's IT environment.
- It does not track IP addresses or other data that could identify a person sending a message.
- Messages can only be decrypted by designated individuals.

NOTE: We recommend that you access the ethics hotline from a device that is not connected to the GardaWorld network.

What happens when I contact the hotline by phone?

When you contact the ethics hotline by phone, a trained Interview Specialist, employed by Convercent, will answer your call.

Reporting is available 24/7, in multiple languages.

Is the process different online?

When you go to the Convercent website, you can type your concern in your own words, providing as many details as possible. You will be asked to provide an email address.

Why am I asked for my e-mail address?

When reporting online, you will be asked to provide your e-mail address. This will allow the platform to notify you if there are new developments posted in relation to your report. Your e-mail address is held by Convercent and will not be disclosed to GardaWorld.

What information should I include in my report?

Be as specific as you can by including a detailed description of the event of misconduct that you suspect or have witnessed:

- Date and time
- Location of the event
- Detailed description of the situation
- You may upload text files and pictures on the platform (meta data is removed to ensure your anonymity).

NOTE: You do not have to have proof of your suspicions, but a report should always be submitted in good faith.

What can be reported?

We strongly encourage people to report any unlawful, fraudulent, dishonest, or unethical action, conduct or activity by GardaWorld, its employees or the representatives that act on GardaWorld's behalf, as well as any matter that poses or is likely to pose a risk to GardaWorld, its staff or its clients. Examples include:

- financial, accounting or audit irregularities
- falsification of documents or records
- fraud or theft
- threats, harassment or inappropriate actions, words, etc.
- conflicts of interest
- bribery or corruption
- discrimination
- safety or environmental hazards
- human Rights violations
- misuse of confidential information

IMPORTANT:

- You do not have to go through the ethics hotline to report any of the elements above. However, if you want to ensure your anonymity, you should do so.
- The ethics hotline is NOT meant to provide emergency response or dispatch services. Do not use this hotline to report events presenting an immediate threat to safety, life or property. If you require emergency assistance, please contact your local authorities.

What type of questions will the interview specialist ask me?

You will be guided through a series of questions concerning the issue you are reporting, such as:

- who are the individuals involved?
- who is responsible for the situation?
- when did the incident occur?
- has the incident happened more than once?
- how do you know of the incident?

When you speak to the Interview Specialist, it is important to provide as much factual information as possible so the matter can be properly addressed or investigated.

What happens after reporting an event?

- Once your report is submitted, either online or by phone, you will receive an email confirmation with a password and a link to access to your file, edit or add to its content (ex: add pictures, additional details, etc.)
- Your e-mail address is held by the 3rd party provider and will not be disclosed to GardaWorld.
- If the receiver of your report posts a response or a follow-up question with regards to your report, you will be notified by email and you will be able to respond using the link and password provided.
- This dialogue remains anonymous for as long as you want and ensures that you have the possibility to contribute to a successful investigation process.

How will I know if my report has been investigated?

When you submit your report via the Convercent website, a specific “access number” will be issued and associated with a password which will allow you to log in and add additional information as well as follow the evolution of the investigation into the complaint.

Am I protected from retaliation and reprisals?

Yes, if the reporting is done honestly and in good faith.

What is retaliation?

Retaliation is taking an adverse action against an employee for engaging in protected activity. Adverse action can include:

- Firing or laying off
- Demoting
- Denying overtime or promotion
- Reducing pay or hours
- Giving an employee a reassignment that affects his or her prospects for promotion
- Disciplining
- Denying benefits
- Failing to hire or rehire
- Blacklisting (intentionally interfering with an employee's ability to obtain future employment)
- Intimidating/harassing
- Making threats

What if my suspicions of misconduct are not proven to be correct?

It does not matter. You will not be retaliated against if you report honestly and in good faith what you sincerely believe to be an event of misconduct.

However, any misuse of the ethics hotline or reporting of alleged wrongdoing that is known to be false, malicious or frivolous may lead to disciplinary action, up to and including termination.

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TRUST
VIGILANCE
RESPECT

GARDAWORLD

