



An ALLIED UNIVERSAL Company

# Supplier Code of Conduct





## INTRODUCTION

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G4S, an Allied Universal® Company, pursues a responsible purchasing policy consistent with its business ethics and company values, respect for fundamental worker rights, and environmental standards, all of which are key conditions for doing business with G4S.

This Supplier Code of Conduct sets out the G4S requirements and expectations with respect to key areas of responsible sourcing. Compliance with the Code by its suppliers enables G4S to uphold its values and deliver sustained excellence for its customers and stakeholders.

This G4S Supplier Code of Conduct is underpinned by international human rights standards, including the International Bill of Human Rights and the UN Guiding Principles on Business and Human Rights, the principles concerning fundamental rights set out in the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and the 2015 Modern Slavery Act.

This Supplier Code of Conduct applies to all G4S Suppliers and their subcontractors, which means all of those with whom G4S and its subsidiaries worldwide have a contractual relationship; including contractors, suppliers of goods and services and joint venture partners.

Any breach of the obligations stipulated in this Supplier Code of Conduct will be considered a material breach of contract by the Supplier.



## EXPECTATIONS FOR SUPPLIERS

As a minimum, all our suppliers must comply with this Supplier Code of Conduct and provide evidence of compliance upon request by G4S. Suppliers are expected to ensure that these obligations are already in place or that there is a clear time-line for full implementation within their own organization and their associated suppliers and subcontractors, including suitable contractual terms.

G4S is committed to the highest standards of business integrity and as a result will not tolerate any practice that is inconsistent with the principles of honesty, integrity and fairness, anywhere in the world that it operates.

G4S reserves the right to audit any of its suppliers and their subcontractors to confirm that the requirements set out in this Code of Conduct are in force. Failure to permit such an audit may result in the termination of any supply contract with G4S and its subsidiaries.

Should G4S identify non-compliance to this Code of Conduct the Supplier will be required to provide a detailed remedial action plan within twenty eight days, which must be presented to the relevant G4S Procurement team. If the Supplier refuses to comply with the agreed actions, G4S reserves the right to terminate the commercial relationship.

Where compliance with this Supplier Code of Conduct could lead to a conflict with or a violation of applicable laws or regulations, the Supplier shall promptly notify G4S of the situation and explain how it intends to operate in a responsible manner.





## BUSINESS ETHICS

G4S considers ethical conduct to be of the highest importance in all business transactions.

All exchanges and transactions with our suppliers are on an honest basis across all aspects of operations both internally and externally and in line with our Business Ethics Code. All transactions will comply with applicable laws and be built on transparency, strict business practices, confidentiality and freedom of competition.

The Supplier and its subcontractors will ensure that ethical considerations are at the heart of their policies and procedures and be able to demonstrate how these take effect in practice



## ENVIRONMENTAL POLICIES

G4S recognises the threat from climate change and that its business activities have a direct and indirect impact on the natural environment. We are committed to proactively managing these impacts in a responsible manner.

The development of sustainable business practices helps us to increase the efficiency of our operations and reduce our resource footprint. In partnership with our customers, employees and suppliers, G4S is investing in energy efficient technologies, reducing waste and encouraging our stakeholders to think about the environmental impact of their decisions, with the aim of reducing the environmental footprint of our operations.

We aim to work with suppliers that proactively support sustainability initiatives, and assist us in understanding and reducing supply chain impacts on the environment. In particular, we want to work with suppliers that provide sustainable products and services, aligning with our values to provide low-carbon solutions to our clients.

All our suppliers are required to adhere to all local applicable laws related to environmental issues. We strongly encourage our suppliers to develop a sustainable environmental policy, which aims at reducing waste and minimizing the environmental impact of their operations. The Supplier will provide G4S with details of its environmental policy and will be expected to provide future data and information as required by G4S to comply with our own environmental strategy and policy.

### The Supplier agrees to:

- > Act in accordance with the applicable statutory and international standards regarding environmental protection.
- > Minimize environmental pollution and make continuous improvements in environmental protection.
- > Set up or use a reasonable environmental management system and demonstrate a commitment to reducing its environmental impact.
- > When requested, provide details of its carbon emissions to G4S as part of a Scope 3 GHG measurement requirement, including the proportion of their emissions that apply to work carried out for G4S and its clients.
- > Not source any timber protected by international agreements such as the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), or if its composition or origin are not known.
- > Procure all timber in accordance with the applicable local legislation and wherever practicable from responsible sources. For supply into the United Kingdom and the European Union all timber products must be sustainable and FSC or (PEFC) certified.
- > Ensure that any food procured on behalf of G4S complies with all legislation related to quality, sustainability and the environment.
- > Only use food suppliers who provide provenance of their main ingredients back to the primary source for food procured on behalf of G4S.



## PROHIBITION OF CORRUPTION AND BRIBERY

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G4S conducts its business in accordance with the highest standards of ethical behavior in accordance with all applicable laws and regulations; therefore it expects its suppliers will:

- > Comply with international anti-bribery standards as stated in the United Nations Global Compact Principle 10 and local anti-corruption and bribery laws including, The UK Bribery Act 2010 and USA Foreign Corrupt Practices Act (FCPA).
- > Not offer services, gifts or benefits to G4S employees in order to influence the employee's conduct in representing G4S in any jurisdiction.
- > Maintain adequate procedures to prevent employees and others performing services on their behalf from paying and receiving bribes.
- > Not engage in the evasion of taxes or assist any other party in the evasion of taxes.
- > Mitigate appropriately against any real or perceived conflict of interest through their work with G4S. A supplier with a position of influence gained through a contract should not use that position to unfairly disadvantage any other supplier or reduce the potential for future competition, for example by creating a technical solution that locks in the Supplier's own goods or services.
- > Any known or suspected instances of corruption and bribery should be reported using the G4S confidential hotline at [G4S-SpeakOut.com](https://www.g4s.com/speakout)



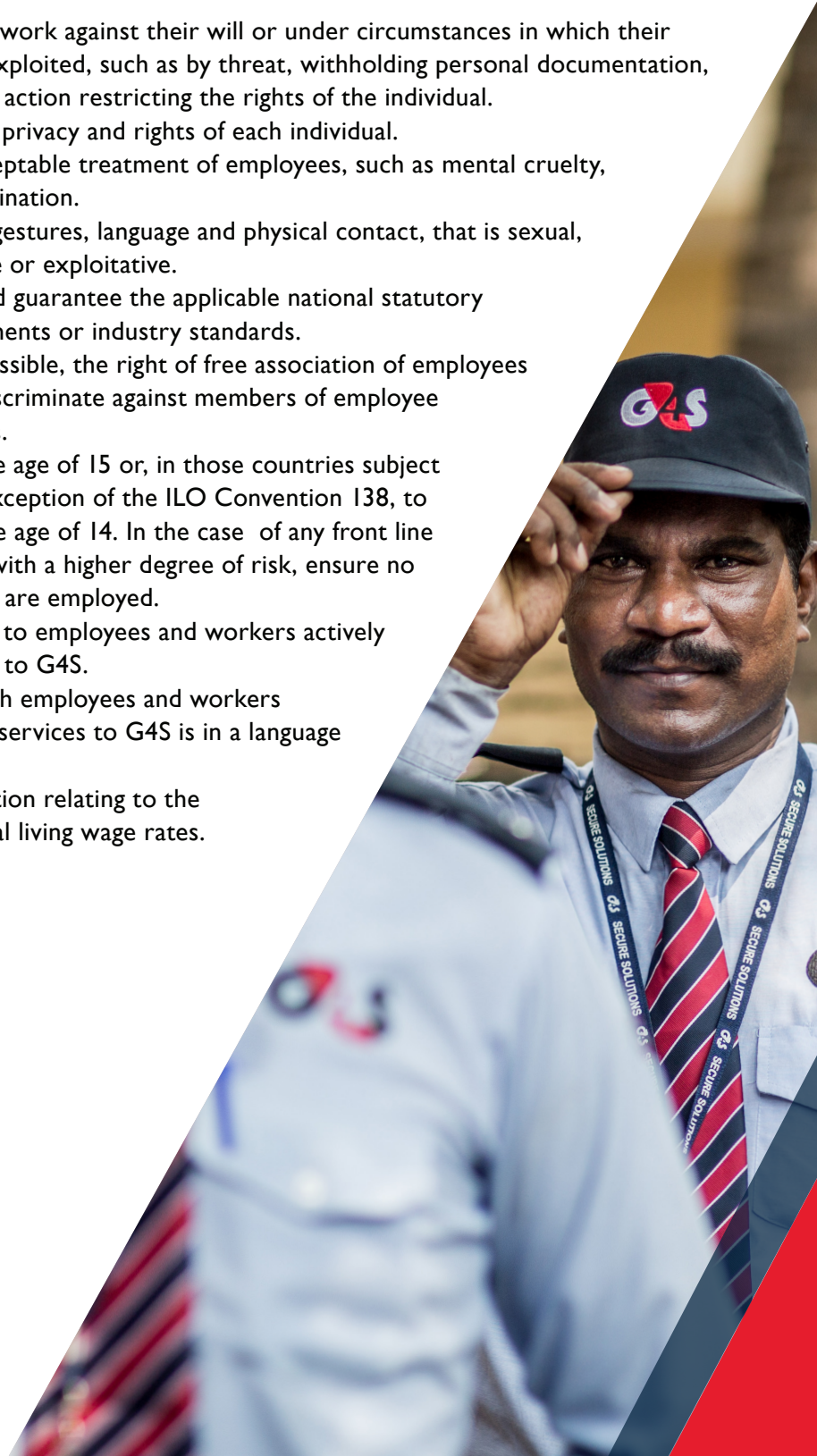


## RESPECT FOR THE BASIC HUMAN RIGHTS OF EMPLOYEES

G4S suppliers must act in line with local legislation, the principles of the United Nations Global Compact, the UN Guiding Principles on Business & Human Rights, the UN Universal Declaration of Human Rights, the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

### The Supplier agrees to:

- > Promote equal opportunities for, and treatment of its employees irrespective of race, nationality, social background, disabilities, sexual orientation, pregnancy or maternity, political or religious conviction, sex, age; marital or civil partnership status or any other factor which cannot be justified.
- > Not employ or make anyone work against their will or under circumstances in which their labour may be coerced and exploited, such as by threat, withholding personal documentation, bonded labour fees, or other action restricting the rights of the individual.
- > Respect the personal dignity, privacy and rights of each individual.
- > Refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination.
- > Prohibit behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.
- > Provide fair remuneration and guarantee the applicable national statutory minimum wage, union agreements or industry standards.
- > Recognize, as far as legally possible, the right of free association of employees and to neither favour nor discriminate against members of employee organizations or trade unions.
- > Employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14. In the case of any front line security roles or other jobs with a higher degree of risk, ensure no workers under the age of 18 are employed.
- > Communicate G4S standards to employees and workers actively engaged in providing services to G4S.
- > Ensure all communication with employees and workers actively engaged in providing services to G4S is in a language understood by them.
- > Comply with any local legislation relating to the application of regional or local living wage rates.





## ANTI-SLAVERY AND HUMAN TRAFFICKING

G4S strictly prohibits the use of modern slavery and human trafficking of any kind in its supply chains. G4S recognises the responsibility it shares with its suppliers to operate in an ethical way to mitigate and eradicate any cases of human rights violation.

### **G4S expects its suppliers to be open and transparent in the way they conduct business with G4S and agree to:**

- › Comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force in the country where they are supplying Goods and Services to or on behalf of G4S (for example the UK Modern Slavery Act 2015).
- › Represent and warrant that it has not has been convicted of any offence involving slavery and human trafficking; nor has it been the subject of any investigation, inquiry or enforcement proceedings regarding any offence or alleged offence of or in connection with slavery and human trafficking.
- › Notify G4S as soon as it becomes aware of (a) any breach, or potential breach of the point above or (b) any actual or suspected slavery or human trafficking in a supply chain which has a connection with the goods or services provided to G4S.



## HEALTH AND SAFETY

G4S expects its suppliers to protect the health and safety of its employees in their place of work. The Supplier must comply with relevant occupational health and safety laws and regulations, as a minimum.

### **The Supplier agrees to:**

- › Evaluate and control risks associated with their business operation, taking precautionary measures to avoid occupational accidents and illnesses.
- › Provide employees with relevant and effective training to enable them to deliver their roles safely, ensuring that employees are trained on health and safety risks in addition to safe work practices.
- › Ensure that training is commensurate with the risk posed by their role and any specific training required by G4S or its customers is delivered.
- › Raise in a timely manner any risks or concerns raised by the Supplier's employees that are related to G4S or G4S customer operations.
- › Provide a work environment that is safe and conducive to good health.
- › Provide employees with the necessary equipment to work without injury.
- › Manage cases of occupational injuries and illnesses effectively.
- › Comply with guidance from national public health authorities in the case of an epidemic/pandemic.
- › Appoint a senior manager with responsibility for the delivery of health and safety.
- › Ensure there is sufficient professional health and safety expertise in place to advise and support the business operations.
- › Provide a point of contact if requested, to liaise with G4S on matters relating to health and safety
- › Ensure that G4S Health and Safety requirements are communicated to, understood and followed by any employees working on G4S activities.
- › Ensure that all accidents and incidents that occur whilst working directly on G4S activities are investigated, and that corrective action is defined, taken and communicated to G4S.
- › Ensure an assurance and audit program is in place to maintain compliance.



## FIREARMS AND USE OF FORCE

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G4S expects those suppliers who provide armed services to only use firearms for the protection of life. G4S expects the Supplier to ensure that all armed employees are licenced, trained and are physically and mentally capable of fulfilling the role.

The Supplier is required to have robust policies and procedures in place that reflect the rules for the use of force relevant to the jurisdiction that they operate in and the UN Basic Principles on Use of Force and Firearms and/or G4S' own Use of Force Policy.

The Supplier is required to report and investigate any breaches of firearms or rules of force policy requirements.



## SUPPLY CHAIN DIVERSITY, EQUITY & INCLUSION

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G4S recognises the importance of diversity, equity and inclusion in all aspects of its business. G4S aims to work in partnership with diverse suppliers (as defined below) and will provide access to resources, material and training where appropriate, to enable diverse suppliers to remain both competitive and supported within the G4S supply chain.

To deliver an effective and sustainable supply chain, G4S seeks to engage diverse and inclusive suppliers within the local communities where we operate.

G4S expects its suppliers to demonstrate a diverse workforce composition actively embracing workforce age, gender, race, national or ethnic origin, religion, language, political beliefs, sexual orientation, physical ability and promoting supply chain inclusion throughout their own supply chains.

### The Supplier agrees to:

- > Use reasonable efforts to promote among its own suppliers compliance with this Code of Conduct.
- > Provide G4S with details of their Diversity, Equity and Inclusion policy and where requested provide evidence of how this policy is put into practice.
- > Be committed to ensuring its own supplier selection processes are transparent, objective and non-discriminatory and provide fair and equal opportunities for all organisations including Small and Medium Enterprises (SMEs), and organisations owned by under-represented groups such as minority business enterprises (MBEs\*), and woman-owned enterprises (WBEs)'
- > Confirm the ability to report periodically to G4S on workforce demographics and other diversity related issues as required.
- > Give robust consideration to the economic, environmental and social consequences of its choice of design, materials, manufacture, production, logistics, service delivery, operation, maintenance, recycling and disposal and to how best to address these consequences.

G4S wishes to engage with suppliers that comply with legal and contractual obligations under any relevant local or international social value legislation. We also encourage our suppliers to support other social value initiatives where appropriate, such as: increasing job opportunities for local residents and disadvantaged groups; improving staff wellbeing; contributing to community initiatives/ local charities; encouraging employment opportunities for ex-military staff; providing apprenticeships and other learning and development opportunities.





## **SCREENING OF EMPLOYEES**

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Suppliers must undertake employee pre-employment screening in compliance with all local laws and in line with the relevant industry standards for all employees, including sub-contracted employees who provide services directly to G4S. For all employees working in security related roles, including any sub-contracted employees, the provisions of the G4S Group Screening Policy will apply and form part of any contractual terms of supply.



## **BUSINESS CONTINUITY PLANNING**

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The Supplier shall be prepared for any disruptions of its business (e.g. natural disasters, terrorism, software viruses and pandemics). This preparedness in particular includes disaster recovery plans to protect both employees and the environment as far as reasonably possible from the effects of possible disasters that arise within the domain of operations.



## **RECORD ACCURACY AND RETENTION**

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The Supplier shall ensure that business records relating to G4S are securely retained for the period required by law, and that they accurately and fairly reflect all business transactions.



## **DATA PROTECTION**

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The Supplier shall ensure compliance with laws and directives providing for the protection, transfer, access and storage of personal information. This includes General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679)



## **GOVERNMENT, MEDIA AND INVESTOR RELATIONS**

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The Supplier shall not instigate any form of publicity or make any statement or submission to investors, the media or government referring to G4S, without first obtaining prior written permission from G4S (except where required by Government or under the law). The Supplier must submit any such request to G4S's Group Communication Department ([media@g4s.com](mailto:media@g4s.com)) for authorisation.



## REPORTING BREACHES OF CODE

All suppliers and subcontractors should provide an appropriate whistleblowing service ensuring that anything related to G4S is raised through the G4S Speak Out process. Any known or suspected breaches of the Supplier Code of Conduct should be reported using the G4S confidential hotline at G4S-SpeakOut.com.



## MANAGEMENT COMMITMENT

The Supplier's board must commit to adopting or establishing a management system designed to ensure compliance with this Supplier Code of Conduct and applicable laws and regulations, identify and mitigate related operational risks, and facilitate continuous improvement.



## CYBER SECURITY

It is essential that suppliers safeguard the integrity and security of their systems and comply with any relevant legal standards and guidance.

Suppliers must maintain the integrity, confidentiality and security of G4S data, ensuring it is not inappropriately altered or disclosed to anyone without a legitimate need to access. Where a suspected or actual security breach is identified, suppliers must inform G4S immediately.

Suppliers must ensure that these requirements are also adhered to by any subcontract data processors.



## TREATMENT OF SUPPLY CHAIN

We expect suppliers to deal fairly with the subcontractors and suppliers in their supply chain. We expect suppliers to avoid passing down unreasonable levels of risk to subcontractors who cannot reasonably be expected to manage or carry these risks. We expect suppliers not to create barriers to the use of small and medium-sized enterprises who are qualified to provide goods or services, and to encourage innovation in their supply chains to increase the value or quality of supply.

### Signed for and on behalf of the Supplier:

Signed \_\_\_\_\_

Name \_\_\_\_\_

Title \_\_\_\_\_

Supplier Name \_\_\_\_\_

Date \_\_\_\_\_