



SLAVERY AND HUMAN TRAFFICKING STATEMENT (2021)

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015, for the year ended 31st December 2021. It sets out the steps that we have taken to identify and reduce the risk of modern slavery occurring within our supply chain and business operations.

Organisation

In April 2021, G4S was acquired by Allied Universal, a leading security and facility services company, established in the United States. Since the acquisition date, the newly enlarged organisation has been working to harmonise the policies and procedures of both companies - sharing experience and adopting the best from both. The integration process is complex and will continue throughout 2022 and into 2023.

With its headquarters in the UK, **G4S Ltd** manages the Allied Universal (International) businesses outside of North America, which continue to be branded G4S.

G4S has a unique global footprint, with operations across more than 80 countries, and is trusted to manage complex security matters for customers across a broad range of government and commercial industry sectors.

In today's world, we believe that there is no greater purpose than serving and helping safeguard customers, communities, and people around the world.

- Delivering industry-leading security solutions to our customers
- Providing rewarding work for our employees
- Making a positive social and economic contribution to our society
- Building a company that creates significant and sustainable value for our key stakeholders.

Further information about Allied Universal and G4S can be found on our websites at [aus.com](https://www.aus.com) and [g4s.com](https://www.g4s.com)

Commitment and approach

We have a continuing commitment to respect human rights. We seek to use our influence and geographical reach to help improve industry standards, provide decent employment opportunities and promote stable communities around the world.



Everyone at G4S is expected to respect and protect the human rights of the company's employees, the people in our care, those who supply G4S, and those that live and work in the communities in which we operate.

There are no circumstances under which any human rights abuses are acceptable or will be tolerated.

We are committed to the continual improvement of our systems and controls to help ensure that modern slavery and other human rights violations do not occur in any of the business operations or supply chains.

We recognise the challenge in identifying modern slavery and human trafficking risks or practices and understand that no global organisation can be complacent nor have complete certainty that it is not present within its organisation or supply chain.

We have taken action and made positive progress, but continue to look for ways to enhance the protection of workers in our organisation and supply chain.

At G4S, we utilise a range of information sources to help us identify potential modern slavery risk areas. These include engagement with NGOs and other independent experts such as EcoVadis, UNI the global union, the International Labour Organisation (ILO), and the United Nations Global Compact's Modern Slavery Working Group. As a result, we continue to focus our efforts on mitigating these risks in both our supply chain and the employment of migrant workers in the Middle East and Asia.

Our supply chain and Supplier Code of Conduct

We strictly prohibit the use of modern slavery in the company's supply chain and accept a shared responsibility with our suppliers to operate in an ethical way and to respect international human rights standards, including the prohibition of forced or coerced labour.

There are currently around 40,000 suppliers supporting G4S's worldwide operations. These deliver a broad range of goods and services, including uniforms, vehicles, technology, catering, professional and support services and equipment.

Our Supplier Code of Conduct sets out G4S's requirements and expectations with respect to key areas of responsible procurement, including the prevention of modern slavery and human rights violations.

As a minimum, all suppliers to G4S are expected to comply with the principles set out in the Supplier Code or to commit to a clear timeline for full implementation within their own organisation, and their associated suppliers and subcontractors.

To help ensure that these principles are met, we engage with suppliers, particularly those categorised as potentially high-risk with regard to modern slavery.



Since 2019, G4S has partnered with [EcoVadis](#), a leading sustainability rating agency, to help us ensure that our suppliers in high-risk categories meet the ethical standards set out in our Supplier Code of Conduct.

The G4S/EcoVadis programme requires in-scope suppliers to complete an assessment tailored to their industry, size and location. The assessment covers 21 criteria across the four sustainability themes of environment, labour and human rights, ethics, and sustainable procurement.

The supplier's responses are analysed by EcoVadis, which provides both the supplier and G4S with a detailed report setting out the supplier's sustainability performance. Where their performance does not meet the required levels, a corrective action plan must be submitted to G4S to address any issues raised.

Since its launch, the programme has been implemented by G4S businesses across 13 countries. Within these markets, around 3.5% (c.450) of suppliers have been categorised as potentially high-risk, including manufacturers of electronics and uniforms, providers of cleaning services and temporary labour.

To date, over 300 EcoVadis assessments have been completed, representing 68% of in-scope suppliers. We are encouraged that 85% of those have achieved a satisfactory rating.

We work with those that have not achieved a satisfactory rating, or who declined to take part in the programme, to address any shortfalls or encourage participation. A small number have failed to fully engage with the programme and have been excluded from our supplier database as a result.

We continue to utilise this experience and expand the programme internationally, with the aim that the G4S/EcoVadis programme be extended to cover 80% of International procurement spend by 2024.

In addition, to support the programme, we have:

- Published a **Supply Chain Social Principles** guidance and due-diligence toolkit, to help procurement teams provide clarity to suppliers on the social standards expected of them.
- Implemented **Integrity Next**, an online supplier monitoring platform that covers key aspects of ethical and sustainability requirements. Initially launched in the UK, we plan to extend this across five countries in 2022, representing around 44% of our International procurement spend.
- Delivered **modern slavery training sessions** to G4S procurement teams and in-scope suppliers.
- Issued communications to colleagues about modern slavery in the supply chain and G4S's commitments.



We reserve the right to audit any of our suppliers and their subcontractors as part of any new contract of supply to confirm that the requirements set out in the Supplier Code are in force. Failure to participate in an EcoVadis assessment or to allow an audit may result in the termination of any supply contract. If an audit identifies levels of non-compliance with the Supplier Code, the supplier will be required to provide a detailed remedial action plan in order to continue doing business with G4S.

Our business operations and our other policies

Where concerns about modern slavery are raised within our business, these will be reviewed to determine the appropriate handling of the matter. Those which are deemed as being of a serious nature are investigated or overseen at a senior and independent level.

In 2021, allegations were received via Speak Out, raising concerns around working hours and the pay of subcontractor employees in the UK. The subsequent investigation found no evidence of modern slavery. However, in order to address these concerns and subcontractor performance, G4S:

- Deployed a team of professional investigators to investigate the allegations. The investigators found evidence that some subcontractor employees had worked excessive hours, but it was not possible to determine that they were coerced to do so. Where appropriate, allegations regarding pay were reported to HM Revenue and Customs.
- Deployed significant numbers of G4S staff on-site to monitor the performance of subcontractors.
- Carried out an increased number of unannounced operational audits.
- Carried out welfare visits, during which subcontractor employees were interviewed in confidence.
- Deployed IT systems which provided an additional level of assurance on compliance with working hours rules.

We use the findings from our investigations to improve our internal processes and procedures around supplier chain risk management.

Migrant worker welfare and employment practices

G4S is a leading global employer that is committed to the highest standards of employment. This includes ensuring that migrant workers are treated fairly and with dignity and respect.



We ensure that our employment policies and practices are consistent with international conventions, including the **UN Guiding Principles on Business and Human Rights** and the **ILO core labour conventions**.

For G4S, the employment of migrant labour is necessary for a small number of countries^{1,2}, where we employ around 24,000 migrant workers as the availability of local labour is scarce. We know that migrant workers are far from home and potentially vulnerable, and it is critical that we safeguard their welfare and human rights.

Our Migrant Worker Policy framework is based upon good practice principles and applies additional measures covering the use of recruitment agencies, accommodation standards and clear employment terms and conditions to help protect employees who are working away from their home country and the legal protections that this would provide them.

G4S is committed to ensuring the human rights of migrant workers (in the same manner as all its employees) are respected. Employment must be freely chosen with no use of forced, compulsory, bonded, indentured or child labour. We aim to offer decent work under terms which protect the health and safety of employees and ensure they are treated fairly, and with dignity.

G4S businesses are required to self-assess against our employment standards and human rights controls on an annual basis and report on action to address any gaps. These are monitored by the Human Resources Department and Head of Government Affairs & ESG. The feedback from the self-assessment is consolidated to show year on year trends and highlight approaches where more guidance or support may be required. The self-assessments are supported by compliance reviews by local and regional teams and independently reviewed by the Internal Audit Department.

We have made significant enhancements to our existing policies and invested in our processes and controls to support and protect migrant workers across the group:

- Refreshed the policies and procedures that reinforce the expected behaviours of all stakeholders in respect of migrant workers. These include the [G4S Ethics Code](#), Migrant Worker Policy Framework and the [Speak Out](#) whistleblowing service. Benchmarked with external organisations where appropriate, these have added rigour to our internal audits and provided further opportunities to establish improved standards, assess compliance and drive change.
- Adopted the 'Employer Pays' principle as set out in the Principles of the [Leadership Group for Responsible Recruitment](#) (LGRR).

¹ Bahrain, Macau, Oman, Saudi Arabia, Thailand, United Arab Emirates

² The G4S branded business in Qatar is not owned by the group. It is owned by the Al-Attiya Group of Trading Companies (AGTC), which operates under a contract that entitles AGTC to use the G4S brand in Qatar. G4S proactively engages with AGTC to promote labour practices which comply with the ILO core labour conventions.



- Implementation of this principle began in 2020 and has been completed in Bahrain, Macau, Oman, Thailand and UAE. We continue to work with businesses operating in Saudi Arabia and Qatar to address the local challenges and complete implementation of the principle well ahead of the LGRR objective of 2026.
- Appointed **Migrant Worker Coordinators** (MWCs) to conduct a programme of checks in both home and destination countries to verify compliance with our Migrant Worker Policy and to confirm that the employee’s experience during the recruitment process is consistent with our standards.

The programme checks cover a range of areas, including:

- The use of recruitment agencies and any associated costs being borne by employees in the recruitment process.
- Consistency of conditions set out in initial offers with actual terms on arrival in the destination country.
- Freedom of movement and any issues that may restrict this such as the withholding of passports or application of unreasonable notice periods or bonded costs.

MWCs are independent of the local management team and report directly to Regional Management outside of the country, who are responsible for ensuring that migrant workers' voices are heard. Where the MWC has established that our standards have not been met, appropriate remediation measures are made.

<i>Migrant Worker Assurance Programme: (November 2019 to March 2022)</i>		
<i>In person interviews with migrant worker employees</i>	<i>Remote surveys completed by migrant worker employees</i>	<i>As a percentage of G4S migrant worker population</i>
4,075	1,457	23%

- Undertaken **modern slavery briefing sessions** for the leadership teams of all G4S businesses employing migrant workers. While the focus for this programme was on our responsibilities to migrant workers, it also highlighted other potential modern slavery situations and how they may relate to G4S within our organisation, our supply chain and in our day to day operations.



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- Established a **Modern Slavery Steering Group**. Chaired by the Chief HR Officer (International), the steering group oversees progress in implementing migrant worker policies and standards and other relevant case reviews.
- Reviewed accommodation for migrant workers and made a number of changes to enhance the facilities.

We have continued to engage with interested stakeholders to ensure that opportunities to accelerate progress are not missed and we continue to make progress. These stakeholders include local business partners, government representatives, and UNI, the global union federation, under our Ethical Employment Partnership (EEP).

Other key policies which relate to the prevention of modern slavery are:

Our Business Ethics Code, sets out in detail how the G4S values and standards should be applied in order to always do business in the right way. Following a comprehensive review, the new Code was launched early in 2021. Supported by mandatory training programmes for all employees, the Code has been designed to be inclusive and accessible to all and relevant at every stage of the employee lifecycle.

The Code, and its accompanying training package, include specific references to human rights matters, including modern slavery and human trafficking.

The G4S Human Rights Policy and Guidelines, which were refreshed early in 2021, apply to all the International businesses, and define our commitment to the Universal Declaration of Human Rights, the UN Guiding Principles on Business & Human Rights and the ILO's Declaration on the Fundamental Rights at Work. They set our approach to human rights, including the responsibility of our management with regard to ongoing risk assessment, regular thematic audit and compliance monitoring. Building on the experience of G4S, Allied Universal is currently developing its human rights policy and framework for implementation across its global operations. This will be launched later this year.

We regularly review the global human rights environment to generate a heat-map. The 2021 review identified 19 countries, in which G4S has operations, as being high-risk environments for a range of human rights matters. These may include restrictions on civil liberties, high levels of corruption and the local attitude to labour rights and standards. The review's findings are integrated into our risk and compliance processes and may trigger additional levels of assessment and internal audit where necessary.

Our Whistleblowing Policy, explains that every G4S colleague has a responsibility to ensure that we uphold our core values, adhere to the law and deliver against the important commitments we set ourselves, including those in our Business Ethics Code, Human Rights Policy, Supplier Code of Conduct and Human Resources Core Standards.



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If colleagues have any concerns that our standards are not being met, we encourage them to use Speak Out (g4s-speakout.com), our global whistleblowing service, to report them.

Speak Out can be used in confidence, in multiple languages, at any time of the day or night, by any employee, former employee or other third party such as people we work with.

Allied Universal's International Ethics Committee oversees the delivery of our whistleblowing policy and conducts regular reviews of serious cases, investigation progress and resulting actions. Every report is assessed and investigated further where appropriate.

Following its independent review, conducted by Protect in 2020, and the subsequent refresh and relaunch of Speak Out, 1,450 cases were raised in 2021 (2019:555) - indicative of the improved awareness and trust in the service.

Signature:

A handwritten signature in black ink, appearing to be 'rlbh', written over a large, faint, light grey watermark of the G4S logo.

This statement was approved by the board of G4S Limited on 29 June 2022 and signed on its behalf by David Buckman, one of its directors.

This statement covers G4S Ltd and its group of companies, with reporting companies proceeding with their own board approvals according to the Modern Slavery Act (2015).

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