

# SLAVERY AND HUMAN TRAFFICKING STATEMENT (2020)



This statement is made in accordance with Section 54 of the Modern Slavery Act 2015, for the year ended 31st December 2020. 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.

## Commitment and approach

G4S has a continuing commitment to respect human rights and we will use our influence and geographical reach to help improve industry standards, provide decent employment opportunities and create secure and promote stable communities around the world.

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

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

We are fully 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 G4S's 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.

## Organisation

With its headquarters in the UK, G4S is the global leader in security services. It has a unique global footprint, with operations across more than 80 countries

Our purpose - **Securing Your World** - is to make the world a safer and more secure place in which to work and live.

We do this by:

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

G4S is trusted to manage some of the most sensitive security matters for customers across a broad range of geographic markets and industry sectors - customers put their trust in G4S and in our colleagues every single day.

- **Security Solutions** - 93% of the group - focused on security and security technology.
  - Custody & Rehabilitation - 7% - focused in Australia and UK.
- **Cash Solutions** - 7% of the group - focused on cash management and cash technology.

At the time of publishing this statement, [G4S had confirmed on 16th March 2021](#) that shareholders representing 79.09% of the group's issued share capital had accepted the offer for G4S plc by Allied Universal. The acquisition of G4S by Allied Universal is expected to complete before 6th April 2021.



On 6 April 2021, the entire issued share capital of G4S plc was acquired by Allied Universal. Following this effective acquisition date, Allied Universal has commenced a Post Completion Review which will inform the future strategy of the enlarged group.

Further information on our organisation and business model may also be found in our Integrated Report at [g4s.com](https://www.g4s.com).

## Our supply chain and Supplier Code of Conduct

We strictly prohibit the use of modern slavery in G4S's supply chain and accept the 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, delivering 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, as well as 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 regards to modern slavery.

G4S is 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.

By the start of 2021, the programme had been implemented across our businesses in Hong Kong, Saudi Arabia, UAE and the UK, where around 5% of suppliers have been categorised as potentially high-risk, including manufacturers of electronics and uniforms, cleaning and temporary labour.

To date 154<sup>1</sup> Ecovadis assessments have been completed, representing 92% of in-scope suppliers. We are pleased that 93% of supplier's scorecards 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. In 2021, we expect to extend the programme to our businesses in Belgium, Denmark, India, Kenya, Luxembourg, Netherlands, South Africa and the USA. By the end of 2023, we aim to have implemented the programme across our top 20 highest spending businesses, to cover 80% of G4S's total procurement spend.

In addition, to support the programme, we have:

- Launched a '**G4S Supply Chain Social Principles**' guidance and due-diligence toolkit, to help G4S procurement teams provide clarity to suppliers on the social standards expected of them.
- Delivered **modern slavery training sessions** to G4S procurement teams and in-scope suppliers.

<sup>1</sup> At 4th March 2021

- 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

### 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 in a small number of countries<sup>2,3</sup>, where we employ around 28,000 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 Group Human Resources Department and Head of Government Affairs & CSR. 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 Group Internal Audit Department.

Over the past two years 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:

- Improved our **Migrant Worker Policy framework** to help ensure that all migrant workers have freedom of movement without restriction and retain all their identity documentation, that employees fully understand the terms and conditions of the roles they are applying for and that these are not varied adversely.
- Adopted the 'Employer Pays' principle as set out in the Principles of the [Leadership Group for Responsible Recruitment](#) (LGRR).

Implementation of this principle began in 2020 and has been completed in Oman, Thailand and UAE. We are committed to completion in all markets 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.

<sup>2</sup> Bahrain, Macau, Oman, Saudi Arabia, Thailand, United Arab Emirates

<sup>3</sup> 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.

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 2021</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>
<i>1,870</i>	<i>765</i>	<i>9.25%</i>

- During 2020, and while current travel to the countries has been restricted due to COVID-19, remote surveys are being used to assess compliance with our standards. We expect face to face compliance interviews with migrant workers to re-commence as soon as COVID-19 restrictions are lifted.
- 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.
- Established a **Modern Slavery Steering Group** to continually review the progress on implementing our migrant worker policies and standards across the group.
- Reviewed **accommodation for migrant workers** and made a number of changes to enhance the facilities.

We have engaged with the Council on Ethics for the Norwegian Government Pension Fund and other interested stakeholders, such as the ILO representative in Qatar and UNI, the global union, under our [Ethical Employment Partnership](#) (EEP) to improve standards in the industry.

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. It is designed to be inclusive and accessible to all and relevant at every stage of the employee lifecycle.

The Code, and it's accompanying training package, includes specific references to human rights matters, including modern slavery and human trafficking.

Our [Human Rights Policy](#) and [Guidelines](#), which were refreshed early in 2021, apply to all of the Group's businesses, 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.

We regularly review the global human rights environment to generate a heat-map. The 2019 review identified 23 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 reviews findings are integrated into our risk and compliance processes and may trigger additional levels of assessment and internal audit where necessary. We will next review the heat-map in 2021.

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.

If colleagues have any concerns that our standards are not being met, we encourage them to use Speak Out ([g4s-speakout.com](https://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.

G4S's Group Ethics Steering Committee oversees the delivery of our whistleblowing policy and conducts regular reviews of serious cases, investigation progress and resulting actions. In 2020, 553 cases were raised via Speak Out (2019:555). Every report is assessed and investigated further where appropriate.

Recognising the need for regular review and continual improvement, in 2020, we undertook a full review of G4S's whistleblowing service, updating our whistleblowing policy, evaluating the case management process and external service provider and refreshing communications materials.

In addition, we engaged [Protect](#), a leading UK whistleblowing charity, to conduct an independent review of our whistleblowing practices. The recommendations from the review are being implemented in 2021, alongside the implementation of a new whistleblowing system and a new whistleblowing policy. This will be further embedded through refreshed training for our investigators and revised training on our values, culture and ethics for the entire business.



*This statement was approved by the board of G4S plc on 6th April 2021 and signed on its behalf by Elisabeth Fleuriot, Chair of the CSR Committee, G4S plc*

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