

# OUR Code

Guiding Principles to Ethical and Responsible Business



An ALLIED UNIVERSAL Company





# Message from the CEO

As the world's leading security and facility services company with operations in more than 100 countries, we are committed to setting the highest standards and leading the industry through uncompromising integrity while upholding the highest ethical standards.

It's critical to our continued success that we act legally, ethically and with integrity. Our Code is the playbook for that success. It provides the fundamental values, principles and standards necessary to make sound, ethical, legal and moral business decisions while living our values and driving our long-term progress.

Every team member is expected to review and follow this Code. If you observe conduct that does not comply with our Code, say something. I can assure you that we are listening and will respond appropriately.

In the end, our goal is to drive a strong ethics and compliance culture that builds trust, promotes integrity and improves the way we engage with each other and our business partners. Our Code is a critical part of that. Join me in upholding it in everything we do as a global team.

Stay safe,  
Steve Jones, Global Chairman and CEO

A handwritten signature in black ink, appearing to read 'Steve Jones'.



# Table of Contents

## 4 Our Responsibilities

- 4 Our Values, Our Culture, Our Code
- 5 Using Our Code
- 6 Speak Out
- 7 Complying with the Law

## 8 Our People and Safety

- 8 Our People
- 9 Health and Safety
- 10 Human Rights
- 10 Combating the Trafficking of Persons
- 11 Culture and Belonging
- 12 Bullying and Harassment
- 13 Ethical Behaviour Towards Animals
- 13 Drugs and Alcohol

## 14 Our Business with Integrity

- 14 Anti-Bribery and Corruption
- 15 Gifts & Entertainment
- 16 Political Contributions
- 17 Conflicts of Interest
- 18 Competition and Antitrust
- 19 Financial Integrity
- 20 Anti-Fraud & Dishonesty
- 21 Anti-Money Laundering and Counter Terrorist Financing

## 22 Our Business Partners

- 22 Our Environment
- 23 Our Customers
- 24 Our Suppliers and Other Third Parties
- 24 Our Communities

## 25 Our Assets and Reputation

- 25 Protecting Our Confidential Information and Assets
- 26 External Communications
- 27 Our Brand and Intellectual Property

## 28 Implementation

## 28 Glossary





## Our Values, Our Culture, Our Code

We champion ethical and responsible business practices throughout our organisation. Our Code empowers us to act with integrity in our interactions with our colleagues, customers and communities. As the cornerstone of our culture, it shapes how we collaborate and ensures our values are deeply embedded in our operations.

### PURPOSE

There for you™, serving and safeguarding customers, communities, and people around the world.

### VISION

Be the world's most trusted services partner.

### MISSION

The company, through its unparalleled customer relationships, provides proactive solutions, cutting-edge smart technology, and tailored services that allow customers to focus on their core business.

### VALUES

WE ARE  
**AGILE,  
RELIABLE  
AND  
INNOVATIVE.**

OUR  
**CARING**  
CULTURE PUTS  
PEOPLE AND  
**SAFETY**  
FIRST.

WE  
DELIVER THROUGH  
**TEAMWORK**  
AND ALWAYS  
ACT WITH  
**INTEGRITY.**



# Using Our Code

Our Code provides the principles of our key policies and commitment to doing business legally, ethically, and with integrity.

Adherence to our Code is mandatory for everyone who works for us in whatever capacity and at any location across the Company, which includes employees, board members, directors and officers. Additionally, third-party shareholders, partners, contractors, representatives and agents working on our behalf are required to follow our Code.

Failure to follow our Code may result in disciplinary action, up to and including termination. Page 6 on Speak Out outlines how to confidentially report actions inconsistent with our Code. Do not hesitate to use Speak Out and encourage others to do the same if they have concerns.

As an employee, it is mandatory that you understand your individual responsibilities in applying our Code when performing your role.



## Your responsibilities

- Read and understand our Code and apply it every day in your role.
- Complete all mandatory training.
- Speak up and ask questions if unsure about making the right decision or raise concerns of instances of noncompliance with our Code.
- Cooperate fully and honestly during any investigation.
- Make informed decisions based on our values.



## Our leaders' and managers' additional responsibilities

- Lead by example, and be a positive role model of our Code and values and create a working environment where you discuss our Code and values with your team.
- Ensure everyone on your team understands our Code and values.
- Encourage colleagues to ask questions and raise concerns. Listen and respond promptly and protect them from any form of retaliation.
- Ensure suppliers, contractors and subcontractors act in a manner consistent with our Code.





# SPEAK OUT!



## Speaking Up

We all have a responsibility to speak up when actions, behaviours or decisions undermine our values or our Code. If you suspect wrongdoing, there are a number of ways to raise your concern. All concerns will be taken seriously and handled confidentially.



## Our speak up channels

- Contact your manager or another manager
- Contact Human Resources (HR), Ethics & Compliance (E&C) or Legal Services Group (LSG)
- Contact Speak Out

If the matter relates to issues such as your work schedule, uniform or pay questions, contact your manager or HR for the quickest resolution.



## Speak Out

Speak Out is our global confidential telephone and web-based service that employees and third parties can use to report breaches of our Code or other wrongdoing, 24-hours a day, seven days a week. The Speak Out helpline is administered by an independent third party. You can report your concern anonymously in accordance with any local laws.

For more information including local phone numbers and online reporting you can visit:

<b>U.S. and Canada</b>	<a href="https://aus.ethicspoint.com">aus.ethicspoint.com</a>	(888) 260-5948
<b>Mexico</b>	<a href="https://aus.ethicspoint.com">aus.ethicspoint.com</a>	(800) 926-0023
<b>International</b>	<a href="https://g4s-speakout.com">g4s-speakout.com</a>	Country phone numbers can be found at <a href="https://g4s-speakout.com">g4s-speakout.com</a>
<b>TSS</b>	<a href="https://tss.ethicspoint.com">tss.ethicspoint.com</a>	0808 196-8164

Concerns can be raised in confidence, and will be treated sensitively, with information being shared on a need to know basis and only for investigating and handling purposes. We will fairly and objectively examine all concerns and take appropriate action.

We do not tolerate retaliation in any form. Allegations of retaliation will be taken seriously, investigated, and addressed appropriately.

Our People and Safety

Our Business with Integrity

Our Business Partners

Our Assets and Reputation

Implementation

Glossary





# Complying with the Law

You must comply with all laws and regulations. Breaking the law harms our business and damages trust and our reputation. In some countries, local laws or specific security industry standards are more stringent than our policies and standards. In that event, stricter requirements apply. Where our Code reflects the local laws, failing to follow our Code could constitute breaking the law. As well as facing disciplinary action for violations, you may also face fines and criminal prosecution.

## What would you do?

It is a legal requirement in our country to acquire security permits for our business. The requirement is not enforced by the government, and we do not think our competitors have them. Do we have to do this?

## Answer:

**Yes. You must always comply with the law. Without exception and regardless of the behaviour of other companies.**



## Your Decision Tool

We must always act ethically, with integrity, making good decisions. If you are not sure about a decision, the following can help guide your decision making:

- Is your decision consistent with the law, our Code, and our values?
- What would happen if everyone made a similar decision?
- What are the potential impacts of your decision?
- Could you stand by your decision if it became public or headline news?

If you are still unsure, speaking to your manager or another trusted colleague can help to make the right decision.

Our People and Safety

Our Business with Integrity

Our Business Partners

Our Assets and Reputation

Implementation

Glossary



Our Responsibilities

## Our People

We are committed to fostering a work environment that attracts, develops, and retains top talent. Our leadership is dedicated to creating an exceptional employee experience through building trust, acting with empathy, and supporting our teams. We strive to ensure that our people feel heard, valued, supported, and have the resources to unlock their full potential.

To ensure we are listening to our teams, we regularly seek feedback from employees. We develop I-Care leaders at every level of the organisation through ongoing training and development and provide employees with career advancement opportunities, so they can continue to learn and grow within the organisation.

By upholding these values and principles, the organisation can achieve increased engagement, innovation, and discretionary effort that is key to our future success.

Our People and Safety

Our Business with Integrity

Our Business Partners

Our Assets and Reputation

Implementation

Glossary





# Health and Safety



Health and safety are top priorities, which means ensuring we identify and address health and safety related risks, consult appropriate persons on health and safety matters to manage those risks, and deliver appropriate training. We investigate all incidents and “near misses” and regularly review health and safety performance to drive improvements. Our goal is “zero harm.”

You must always comply with health and safety laws, customer safety requirements and our health and safety policies, procedures and standards. You must complete all health and safety training, always use and wear all safety equipment correctly and follow all procedures that help protect you.



## Workplace Violence

Violence has no place at our offices, locations, posts or job sites. This includes intimidation, violent acts, and/or threats of violence. We will not tolerate this conduct.



## Use of Force

We are committed to the safety of our employees, customers and communities and have strict standards regarding use of force. Our primary responsibility in a security role is to detect and deter while involving law enforcement when needed. You must strictly comply with our use of force policy and procedures using de-escalation techniques unless protecting yourself or others from immediate harm, to the extent permitted by Company policies and applicable law and consistent with your training. Where we provide Care and Rehabilitation services, we comply with the standards set by the relevant authorities and government agencies for our use of force procedures, training, and incident review processes.



## Weapons

No Company employee or anyone acting on the Company's behalf may carry, possess, or store a firearm or other weapon, including less lethal weapons, during the course and scope of their employment, except as permitted by applicable Company policy. In matters where relevant country or U.S. state law prohibits such a restriction, Company policy prohibits the carrying of a personal firearm to work, as well as having a personal firearm available in any compartment of a Company vehicle or private vehicle being used for work purposes.

*See the Company's health and safety policies for more information.*



# Human Rights

We are committed to respecting human rights and fulfilling humanitarian responsibilities towards our employees, customers, suppliers, investors, and communities we serve.

We closely monitor human rights abuses, which can be complex and hard to identify and include modern slavery, unnecessary or illegal use of force, mistreatment of detainees, restricting freedom of movement, and criminal and sexual exploitation.

Importantly, a business can violate an individual's human rights as follows:

- Directly, by abusive actions or policies.
- Actively colluding with or supporting the violation of human rights by states, partners, customers or other parties.
- Indirectly, through its links to subcontractors or suppliers which abuse human rights as they support or act on our behalf.

You must report any human rights violations to your manager or Speak Out.



## Combating the Trafficking of Persons

We prohibit employees, agents, and subcontractors from engaging in human trafficking or any related activity. We take our responsibility to combat human trafficking seriously by following proper hiring requirements and labour laws in all jurisdictions where we do business. If in the course of your job duties you witness anyone engaged in suspected trafficking-related activities, you must immediately report this conduct to your manager or Speak Out, as well as law enforcement authorities.

### What would you do?

I work as a security professional at an airport. During the last few months, I have noticed the same passenger being accompanied by different children. The children are all roughly the same age and look fearful. Should I say anything?

### Answer:

Yes. Well done for being alert. This may be a case of human trafficking or child labour and you should tell your supervisor or manager about your concerns.



- You must always behave in a way which recognizes the value of teamwork and encourages mutual respect.
- Be open to new ideas, listen to suggestions and welcome different points of view regardless of where they come from.
- Never discriminate against people based on personal characteristics such as their race, color, ethnic origin, age, nationality, disability, gender, sexual orientation, gender identity, marital status or any other characteristic protected by law.
- Anyone involved in decisions affecting the employment or care of others is required to attend training to ensure they understand their responsibilities and legal obligations to make decisions that are objective and fair.
- Challenge any unacceptable or inappropriate behaviour so it can be addressed.

We are an equal opportunity employer that does not tolerate discrimination against any employee or applicant on the basis of any legally protected characteristic or status. This applies to all terms and conditions of employment, including pay rates, terminations, promotions, evaluations or other aspects of career development.

*For more information, please review the Company's Culture and Belonging Policy.*







## Bullying and Harassment

A safe, respectful and inclusive work environment is critical for fostering a caring culture. We are committed to ensuring that no employee is bullied, harassed or discriminated against in any way by a supervisor, other employees, customers or their employees or any other person in the workplace. Any behaviours that create a hostile, degrading, intimidating or offensive environment will not be tolerated. Bullying and harassment of any kind is unacceptable.

- While on duty, always treat others with respect and be aware of how your behaviour affects others including those in our care.
- Do not engage in behaviours that could be seen as abuse or harassment, such as name calling, innuendo, inappropriate jokes or purposely misgendering people.
- Never engage in displaying or sharing offensive or inappropriate images, graffiti or content of a sexual nature.
- Never engage in physical behaviours such as touching, pinching, patting, coercion or violence, whether actual or threatened.
- Be an ally for others and challenge and report behaviours that are not in line with our policies, our Code or our values.

We do not tolerate retaliation and will take any retaliation concerns seriously. Retaliation can include denying a training opportunity, rejecting holiday requests, blocking promotions or similar type behaviour.

### What would you do?

At the site where I work, the customer and my colleagues use abbreviated names for me, which are rude and they know I dislike them. Should I report this or just accept it as workplace banter?

### Answer:

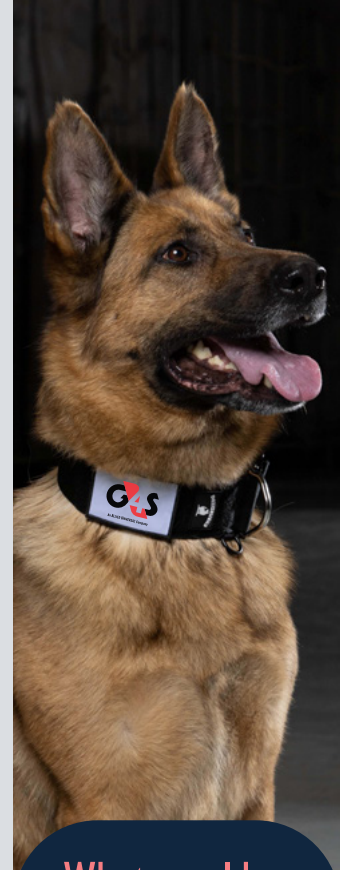
**Answer: You should report it to your supervisor or via Speak Out. We will not tolerate any form of harassing behaviour that undermines the dignity of others at work.**



# Ethical Behaviour Towards Animals

The Company acts in accordance with applicable laws related to the prevention of cruelty to animals and the Company's canine care and protection policies. The Company will not tolerate mistreatment or cruelty towards animals. We believe all animals deserve:

- Freedom from hunger and thirst by ready access to fresh water and diet to maintain health and vigor.
- Freedom from discomfort by providing an appropriate environment, including shelter, transport, and a comfortable resting area.
- Freedom from pain, injury or disease by prevention or rapid diagnosis and treatment.
- Freedom to express normal behaviour by providing sufficient space, proper facilities, and companionship.
- Freedom from fear or distress by ensuring conditions and treatment(s), which avoid mental suffering.



## Drugs and Alcohol

You are not permitted to use, possess, or be under the influence of any substance that could impair your ability to perform your job, such as alcoholic beverages, marijuana, illegal drugs, misused prescription medications, or other unauthorised controlled substances in the workplace or while engaged in job related activity.

If you are taking a prescribed or over-the-counter medication that may affect your ability to work safely, you must immediately inform your manager and HR.

*See the Company's human resource policies for more information.*

### What would you do?

I noticed a security professional arriving for work in the morning. Her speech was slurred and she was unsteady on her feet. Should I say something?

### Answer:

Yes, before she puts herself or her colleagues at risk, raise your concerns with her supervisor, HR or Speak Out.





Our Responsibilities

## Anti-Bribery and Corruption

We compete on merit, win business fairly and work with reputable customers and suppliers. Neither employees nor anyone acting on the Company's behalf may offer, make, promise, request or accept a bribe, kickback or any other improper payment, gift, favor or other item of value in connection with the Company's business.

Our Global Anti-Bribery and Anti-Corruption Policy is simple. Remember:

- We do not accept or offer bribes.
- We do not accept or offer kickbacks or illegal payments of any kind.
- We do not tolerate corruption in any form.

Local laws and customs are not an exception to this rule; regardless of location and context, we never pay or receive bribes. If you need help navigating a culturally sensitive situation, speak with your manager, contact HR, E&C or Speak Out.

Facilitation payments are small amounts of money or goods sometimes known as "grease payments" given to government officials to expedite the performance of a routine task, or to take action, already within their scope of authority. These are also considered bribes and are forbidden.

Those found to have been involved in bribery or any form of corrupt practices, whether directly or indirectly, will be subject to disciplinary action, up to and including termination of employment, and may also face criminal charges.

*For more information, please review the Company's Global Anti-Bribery and Anti-Corruption Policy.*

### What would you do?

On checking the delivery note for a delivery to a customer, you notice that there are three bags missing. When asked about the shortage, the delivery driver immediately offers you some money in exchange for not saying anything. Should you accept the payment?

### Answer:

**No, the payment being offered is a bribe and accepting it would be inconsistent with our values, our Code and Global Anti-Bribery and Anti-Corruption Policy, and possibly the law. You should decline the money and promptly report the matter to your manager or Speak Out.**

Our People and Safety

Our Business with Integrity

Our Business Partners

Our Assets and Reputation

Implementation

Glossary



The personal safety of our employees is our highest priority. If any payments are demanded to protect colleagues from imminent harm, any such payment must be reported as soon as practical to LSG or E&C.



# Gifts and Entertainment



Gifts or entertainment of customers and potential customers are permitted under certain circumstances and must not be excessive. Exchanging gifts and entertainment to develop good business relations is permitted and must follow region-specific guidance as to the nature and amount of the expense and appropriate approval processes.

Importantly, gifts to or entertainment of a potential customer around the time of a bid for that customer is prohibited. We are strictly prohibited from providing, or receiving gifts, gratuities, or entertainment from government officials or government employees. For those doing business with the U.S. Government, refer to Gift Giving – Business Courtesies and Entertainment When Dealing With Federal Government Employees for additional details.

You must refrain from giving or accepting: cash; cash equivalents, such as prepaid gift cards; stocks; checks; money orders; loans; lavish entertainment; and favors from customers, competitors, or vendors. Please see any region-specific policy for further guidance.

Any variance from these rules requires prior written approval from your manager in accordance with our policies. Stay alert, use common sense, and do not put yourself or the Company at risk.

Always follow the guidance in this Code, the relevant gifts and entertainment policy and any local policies and follow the strictest requirement.

*For more information, please consult with your leadership and review the relevant local policies.*

## What would you do?

You have received a small box of cookies to celebrate the New Year from a local recruitment supplier who has been involved in a number of appointments. They are worth about \$5 and are a traditional offering the New Year. Should these cookies be returned or is it okay to keep them and share them with colleagues?

## Answer:

It is acceptable to keep small gifts of nominal value that are not going to influence or be perceived as influencing your decision to use a particular supplier. Always be transparent about any gifts received with your manager and thank the supplier promptly. Your local gifts and entertainment policy states the value threshold for gifts and approval process for variances.



## Political Contributions

We do not prohibit employees from voluntarily making personal political contributions, participating in the political process on personal time, or expressing personal views on legislative or political matters. Involvement in civic affairs or political activities is a personal choice. If you speak out on public issues, you must make it clear that you are speaking only for yourself and not for the Company or in your capacity as an employee or representative of the Company.

Campaign finance and ethics laws, as well as Company policy, prohibit the use of Company funds, assets, services, or facilities on behalf of a political party except under limited circumstances. The Company will not compensate or reimburse you or any employee, in any form, for any political contribution. Any political solicitation made during business hours on or at Company facilities must be approved in advance by senior management.

Personal political activities can sometimes create a conflict of interest with the Company. Speak with your manager if you believe your political activity might affect (or even appear to affect) your role in the Company and/or the Company's disclosure obligations.

### What would you do?

I am using my social media profile to help raise awareness of a political candidate. Is that okay? I only use social media on my own time and there is no mention of my job on my profile.

### Answer:

Yes, so long as you do not claim to be speaking for the Company and you do it on your own time. You might want to review local laws to determine whether such involvement with the political candidate triggers disclosure obligations.





# Conflicts of Interest

The Company policy on conflicts of interest is straightforward. In the course and scope of your duties with the Company:

- Always act in the best interest of the Company.
- Always protect the Company's reputation.
- Protect and enhance the trust of our customers and suppliers.
- Do not allow financial, personal, or social activities to interfere with commitments to the Company.

A conflict of interest arises if your personal, professional, social, financial or political interests or activities interfere with your responsibilities to the Company, or your ability to make objective decisions for the Company. Being transparent and proactive in disclosing and recording conflicts of interest allows them to be appropriately managed, protecting you and the Company.

Our Code cannot describe every potential conflict of interest. The list below describes some of the more common examples:

- **Workplace relationships:** such as having personal or romantic relationships with other Company employees, vendors, customers, or an employee, tenant, or customer at the account to which you are assigned.
- **Working with close relatives and friends:** such as supervising a family member who also works at the Company in your managerial line.
- **Resourcing:** such as being involved in the hiring process of a candidate that is a close relative or someone with whom you have a close relationship.
- **Political appointments:** running for, or accepting an appointment to, a political or government office.
- **Outside employment or business opportunities:** such as holding a second job outside of the Company that conflicts with your work here. You should discuss any second job with your manager to determine if a conflict or potential conflict exists.
- **Personal investments:** such as having any personal interest, dealings or ownership in any business that is either a competitor, customer, supplier, Company business partner (actual or contemplated), trade association, or industry standard-setting organisation.

Importantly, even the appearance or perception of a conflict is a problem. You must report any actual, potential or perceived conflict to your manager.





# Competition and Antitrust

We compete fairly and ethically and comply with competition and antitrust laws. These laws are intended to ensure that competition between companies is fair and protects the public. Sharing competitor information, agreeing to fix prices, allocating markets and other practices that would inhibit competition is prohibited.

Never enter into inappropriate discussions with competitors. Never enter into agreements, formal or not, expressed or implied, that unreasonably restrict competition. This includes:

- Agreements with competitors to charge customers the same price (price fixing), reduce competition in bidding (bid rigging), or divide markets or service territories (market allocations).
- Agreements not to sell to or buy from competitors and/or suppliers (boycotts).
- Requiring a customer to buy an item or service as a condition to buying another item or service (tying).
- Never discuss confidential information about the Company with competitors or seek confidential information from them. Be particularly careful at industry forums, trade association meetings and similar gatherings to avoid participating in any informal discussions with representatives of competitors about anticompetitive topics.

*For additional information, please review the Company's Global Fair Competition and Antitrust Policy.*

## What would you do?

After a meeting with several competitors, we agreed to go for a quick lunch. The topic of business acquisitions came up and they started talking about their expansion plans. I excused myself and left the meeting. Was I right to do so?

## Answer:

Yes, you did the right thing. Never participate in conversations about confidential business matters with competitors. State your reason for leaving the conversation before you walk away and ask that your decision to leave due to concerns over the topic of discussion be noted. If you are not sure whether the topic of discussion is permissible, exercise caution and leave the meeting.





# Financial Integrity



## Recordkeeping, Accounting and Internal Controls

We strictly adhere to laws, regulations, accounting principles, ethical practices, and other criteria designed to ensure full accountability and reliability in our accounting records, systems, and financial statements.

We maintain accurate, auditable books and records of account that fairly reflect our transactions, and we maintain an effective system of internal controls to ensure integrity and completeness of our financial records.

We expect employees to accurately collect, record, and report Company information, including payroll-related data, time and attendance records, test and training results, cost and pricing data, invoice and billing records, purchase orders, and all other data that supports our books and records.

Employees with responsibility for preparing and maintaining the Company's financial statements must comply with our internal accounting policies and procedures, which are based on generally accepted accounting practices, as well as with laws and regulations and Company policies governing record retention and preservation. Absolutely no false or misleading entries may be made for any reason.



## External Audits and Reviews

On an annual basis, the Company engages an independent accounting firm to audit its books and records of account. At times, federal, state, and local government regulators and inspectors, inclusive of tax auditors, insurance auditors, and other qualified inspectors, might subject the Company to routine operational audits and inspections. We fully cooperate with such audits and reviews and promptly, completely, and accurately address requests for information. Employees are prohibited from concealing, destroying, or altering original documents and records; delaying communication of information or records; knowingly providing false or misleading statements or inaccurate information to auditors or inspectors; or otherwise obstructing access to information.

If you have any questions or concerns about an audit or investigation at your site, consult your manager.



## Insider Trading Laws

As an employee of the Company, you may have access to material non-public information concerning the Company or its vendors, suppliers, or customers. Common examples of such information include, but are not limited to: new service contracts, personnel changes, marketing strategies, proposed mergers and acquisitions, and financial results or other strategic plans. It is a criminal offense to use inside information for illegal purposes.

If in possession of material non-public information, you must not share that information internally or externally without prior approval. Moreover, you must not use that information or engage in any action to take advantage of that information, such as buying or selling Company securities (if and when publicly available) based on that non-public information.



# Anti-Fraud and Dishonesty

Do not engage, directly or indirectly, in dishonesty, fraud, theft, embezzlement, falsification of records (including but not limited to falsifying timecards, injury reports, property claims, training records, and expense reports), whether in paper or electronic form.

Fraud encompasses acts such as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation or concealment of material facts, and collusion which may result – directly or indirectly – in financial or personal gain to the perpetrator, the Company, or a third party.

Report attempts or suspected acts of fraud, deceit, or dishonesty to your manager or via Speak Out. The business may attempt, where practical and appropriate, to recover losses using civil and/or criminal remedies and report such attempts to law enforcement.

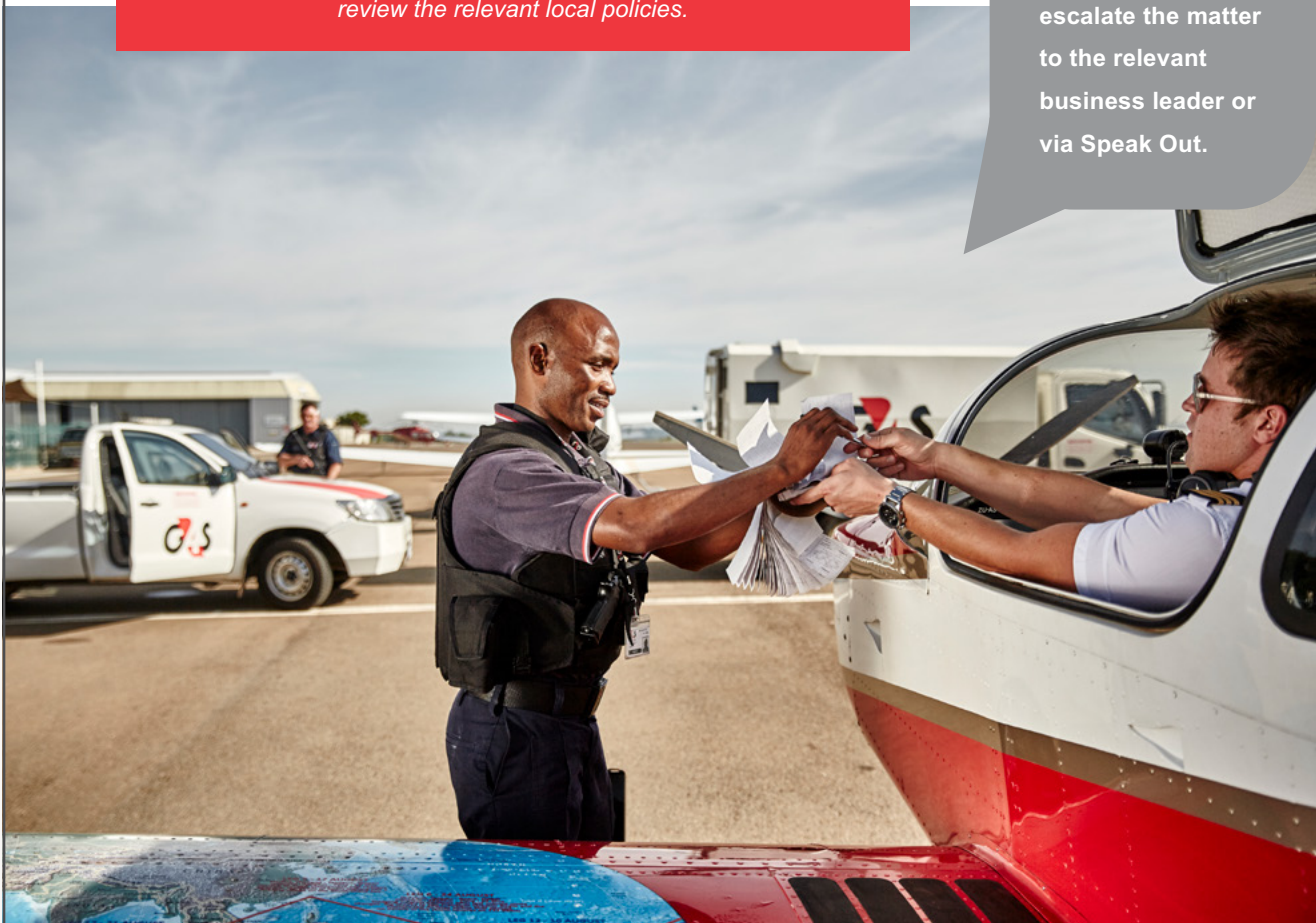
*For additional information, please consult with your leadership and review the relevant local policies.*

## What would you do?

An employee has prepared the monthly performance report for a customer. When his manager checks the report, she asks him to increase some of the lower KPI scores because they may give the customer a poor impression of the Company. What should he do?

## Answer:

Refuse to make the change and escalate the matter to the relevant business leader or via Speak Out.





# Anti-Money Laundering and Counter Terrorist Financing

Anti-money laundering (AML) and counter terrorist financing (CTF) laws seek to prevent the financial system from being used to receive and legitimately transfer the proceeds of crime, to finance terrorism, or evade taxes, and to stop entities and individuals from hiding, benefiting from and facilitating money laundering or the financing of terrorism. You must:

- Never become involved in money laundering or conduct business with persons who are suspected to be linked to illegal activity.
- Never conceal, disguise, convert or transfer the proceeds of crime.
- Never remove the proceeds of a crime from a country.
- Never acquire, use or possess the proceeds of a crime.
- Never aid or abet, facilitate or procure such activities.
- Never assist or facilitate any party with the unlawful evasion of taxes.

Our cash solutions businesses handle cash and other valuables belonging to customers and third parties, which increases their exposure to the risk of money laundering or terrorist financing. To mitigate that risk, employees working with those businesses must adhere to additional rules and business-specific policies. Those employees should ask their manager about any additional compliance expectations specific to their role with the business.

- Promptly seek advice from your manager and LSG if any demand or request is received from a law enforcement agency in connection with alleged money laundering or terrorist financing.
- Do not “tip off” customers or third parties if you become aware that law enforcement agencies are conducting an investigation into suspected money laundering or terrorist financing, as this could itself be a criminal offense.

We are committed to complying with all applicable AML and CTF laws and regulations.

*For additional information, please consult with your leadership and review the relevant local policies.*

## What would you do?

The police inform the Company that they are investigating one of our customers for suspected money laundering. The police request confidential information about previous transactions. Should I comply with the police request? What should I tell the customer?

## Answer:

You should immediately report the request to your manager, who can consult with LSG and ensure that the Company cooperates with the police investigation in the appropriate way and in accordance with applicable laws, policies and contractual commitments. Do not notify the customer about the police investigation, as this could assist them in evading the law.



Our Responsibilities

Our People and Safety

Our Business with  
Integrity

Our Business Partners



## Our Environment

We strive to reduce our impact on the environment, setting targets for any reductions in carbon intensity and the management of waste, water, vehicle emissions and energy consumption.

We collaborate with others to find ways to operate more sustainably. Where opportunities permit, we also partner with our customers, contractors and suppliers to achieve the same. We encourage you to:

- Explore every opportunity to adopt more sustainable practices that reduce energy and water consumption and produce less waste.
- Protect the environment for the future. Never litter.
- Switch off engines and equipment when not in use and treat water as a scarce resource regardless of where you live.
- Notify us if you have ideas about how to reduce our environmental impact. We are listening and would like to hear them.

Our Assets and  
Reputation

Implementation

Glossary



# Our Customers

We look to partner with reputable customers who respect our people and share our values. Our goal is to develop and enhance long-term customer relationships. At the heart of these relationships is a bond of trust and openness, honesty and transparency throughout all our interactions.

Our customers entrust us with their most valuable resources—their people, their information and their assets. In return, we commit to behaving in line with our values and to ensure our work is of the highest quality. We value our customers and any treatment of their assets or information in a dishonest or disrespectful way is prohibited.

We comply with applicable laws and regulations, including trade sanctions and restrictions imposed on countries, individuals and governments.

- You must always be truthful in your dealings with customers. Never promise what you know we cannot deliver or deliver less than we have promised.
- Charges and costs must always be accurate and lawful.
- Never agree to contracts with customers unless you have written approval to proceed. If you are unsure, check with your local finance department.
- Do not pressure customers to buy our services or commit to a contract they do not want.



## Government Services

We serve many government agencies and other public authorities globally. We comply with all laws and regulations applicable to relationships and potential relationships with such agencies and authorities and their employees. These laws may vary by country and it is your responsibility to maintain awareness of the laws that may apply to you. Employees serving governmental entities in the U.S. must also follow the Company's Guidelines Applicable to U.S. Government Procurement Activities. The policies are available on the Company intranet sites or ask your manager.

## What would you do?

I process invoices for our customers and have noticed that the costs have more than doubled for one of them. This seems strange given the size of the contract has not changed. Should I say something?

## Answer:

**Yes, always raise concerns about invoices with the relevant account or local finance manager so they can investigate. Customer invoices must be accurate.**





# Our Suppliers and Other Third Parties

We set high ethical standards and want to work with reputable third parties (e.g., suppliers, vendors and subcontractors) who share our commitment to ethical business practices. When necessary, we help suppliers and other third parties enhance their standards.

You must follow all procurement policies when engaging suppliers and other third parties. Treat them with respect, fairness and honesty and enable them to perform effectively. Never approve expenditures that are outside your delegated authority. If you are not sure of your expenditure limits, seek guidance from the local finance department. Follow-up with your local team about applicable procurement and third-party due diligence policies. Ensuring appropriate due diligence is performed on our business partners is critical to our success.

---

## Our Communities

We care about our communities and operate in a respectful way. This includes encouraging voluntary work, sponsorship of community projects and charitable fundraising for a variety of causes. We will also serve local interests by providing good employment opportunities with meaningful work and fair wages.

We will share our knowledge, expertise and resources to help raise the standards for the industry and for the benefit of our communities.





# Protecting Our Confidential Information and Assets

We protect the confidentiality of information belonging to the Company, our employees, our customers and suppliers.



## Use of Resources

Inappropriate and illegal use of Company or customer property is prohibited. Use good judgment in the use of Company and customer-provided property. The Company reserves the right to inspect and review the contents of electronic equipment connected to its network and to monitor use of the Company's IT network to maintain and ensure its safety and integrity. Employees have no expectation of privacy when using the Company's IT network or electronic equipment.

Do not use Company resources to transmit, store, or download materials that are in violation of applicable law (i.e., movies, unlicensed software, or stolen software) or that could be considered threatening, maliciously false, or obscene. In addition, you are strongly encouraged to use only company-issued hardware and software to conduct business. If this is not possible or practical, please consult your manager. Only utilise customer property in accordance with our Code and written agreements with the customer.



## Privacy and Confidentiality

The Company handles personal information of its employees and customers, as well as that of individuals who might visit our and our customers' facilities or become involved in a security event (e.g., a courier, witness, etc.). We also create confidential and proprietary business information. The Company is committed to lawfully collecting, processing, transmitting and protecting personal and confidential information, and to securing the networks and systems on which that information is stored. Compliance policies and guidance regarding potentially applicable U.S. and international privacy and information security laws are available on the Company's intranet.

**Personal Information:** Any information that relates either directly or indirectly to an identifiable person (e.g., name, date of birth, government-issued identification number, address, email, phone number, ethnicity, gender and other information that alone or in combination with other elements of personal information could be used to identify a specific individual).

**Confidential Business Information:** Any information that relates to the Company's business dealings, including but not limited to, financial, marketing and statistical data, competitive information, and other non-public company information.

Failure to protect both personal and confidential business information from unauthorised access could subject the Company or yourself to civil and/or criminal action, give both the Company and our customers' competitors an unfair advantage, or lead to reputational damage.

You must take precautions not to handle, view, or share such information outside the scope of your job duties. Employees who inadvertently do so must protect this information from any further disclosure subject to applicable laws.

You must also ask your manager before utilising any third-party technology solution to ensure it has been approved for use by the IT Department.



Our Responsibilities

Our People and Safety

Our Business with Integrity

Our Business Partners

Our Assets and Reputation

Implementation

Glossary



## External Communications

We are bound by Company policies regarding speaking with the media and posting information on the Internet. Only designated spokespeople are permitted to speak to the press on behalf of the Company or make public posts or statements on behalf of the Company. If you are contacted by a member of the media, direct them to either [pressna@aus.com](mailto:pressna@aus.com) or [media@g4s.com](mailto:media@g4s.com) or tell your manager.

Employees who utilise social media or other internet sites for personal purposes should carefully consider how the information they share affects or reflects on the Company if they are identifiable as a Company employee. Do not share or post online any of the Company's confidential or proprietary information or any information that would compromise a customer's security or business operations or reveal confidential personal information.

This does not prohibit employees from engaging in protected concerted activity. This policy does not and should not be interpreted to infringe upon an employee's right to communicate with others related to issues concerning wages and other terms and conditions of employment.

Employees must adhere to fair, forthright, and legal sales and marketing practices and present only truthful, non-deceptive information.

Use social media wisely and always think about the way information may be received or perceived.

What would you do?

I found some information about the Company on LinkedIn which includes photos taken at work which I think puts our colleagues at risk. What should I do?

**Answer:**

**Raise it with your manager or a member of the communications team so they can follow up and seek to have it removed, if appropriate.**



# Our Brand and Intellectual Property

We require all employees to protect and respect our brands and other intellectual property and use them appropriately. Our Company family of brands, which includes our logos and any trademarks, are our intellectual property. Across the world, wherever we operate, our brands are important. It reflects our common identity and values and represents an organisation that can be trusted. We all have a responsibility to safeguard our brands from any misuse.

We must follow laws pertaining to copyright protection in all jurisdictions in which we operate. This includes laws that prohibit duplication of print materials, licensed computer software, and other copyright-protected works. We also have a responsibility to respect the intellectual property and brands of other organisations too.



An ALLIED UNIVERSAL<sup>®</sup> Company





# IMPLEMENTATION

## Our Responsibilities

Our Code is intended to help you do business ethically and with integrity. To make that possible, it is widely distributed and regularly updated.

When committing to work with or for us, you are committing to following our Code. In some cases, it will form part of your contract of employment. In many cases the terms within it are also the law.

Please follow it and if you have any concerns raise them with your manager or via Speak Out.

## Our People and Safety

Our Code can not be waived without prior written approval from the Allied Universal Global Chief Compliance Officer. Our Code sets out our expectations of everyone we work with and our commitment to doing business legally, ethically, and with integrity. Failure to comply with our Code will be addressed through appropriate actions, which may include disciplinary up to and including termination of employment.

## Our Business with Integrity

## Our Business Partners

## Our Assets and Reputation



# GLOSSARY

**Company** - includes Allied Universal and all Allied Universal subsidiaries, affiliates, and related companies worldwide, including G4S Limited and its subsidiaries.

**Ethics & Compliance** - E&C

**Human Resources** - HR

**Legal Services Group** - LSG

**Global Code of Ethics** - Our Code

## Implementation

## Glossary



An ALLIED UNIVERSAL Company