# **United Nations Global Compact**

GardaWorld International Protective Services Communication Progress 5<sup>th</sup> August 2017

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# PRESIDENT & COO STATEMENT OF CONTINUED SUPPORT

I am pleased in 2017 to once again pledge the support of both Aegis Defence Services Limited and GardaWorld International Protective Services and, for the first time, the support of our recently acquired affiliate KK Security Group (collectively GardaWorld IPS) in the participation of the United Nations Global Compact, and to provide our action plan to continue to deliver our commitment to advancing internationally recognised Human Rights, Labour, Environmental, Anti-Bribery and Corruption principles. Our commitment to these principles is a fundamental element of our long-standing work to establish and develop high standards across the private security industry. The commitments discussed in this document are embedded into our business; we use them as a guide to set the objectives and performance expectations in our Compliance and Operational Excellence Framework.

As a growing business, GardaWorld IPS continues to identify best practice relevant to our industry in order to ensure that we keep build on our leading role to promote, create and implement a regulatory framework for the global security sector that has human rights at its heart. One recent example is our participation in both the working group and technical committee during the review of the internationally recognised standard ANSI/ASIS PSC.1.

We are determined to continue to improve our performance in all areas. Our support and commitment to the Compact is continuous and unwavering.

**Oliver Westmacott** 

President & Chief Operating Officer, GardaWorld International Protective Services

#### **GENERAL**

GardaWorld International Protection Services is a Dubai based, privately owned company that provides integrated, land-based and offshore security, risk management and consultancy services in complex and potentially high-risk environments. The company has overseas offices in Afghanistan, Libya, Nigeria, Mali, Haiti, Mozambique, Somalia, Yemen, Iraq, United Kingdom, Kenya, Tanzania, Uganda, DRC, Malawi, Rwanda, Burundi, Belgium, Paris and the USA. We have substantial experience and a worldwide client base, including governments, international agencies and the international corporate sector. We are a major security provider to the US and UK governments, the EU and are a registered UN contractor.

We offer industry leading risk advice and security solutions – from corporate operations, commercial risk and foreign investment to counter-terrorism, close protection and support to governments. With a global footprint, our partners, associates and clients further benefit from the extensive capabilities of our personnel, built up through careers in the military, diplomatic and intelligence services, as well as in the police, journalism, the UN, finance and commerce. This breadth of knowledge, combined with our practical experience gained in over 20 years of operations, allows us to provide the highest quality specialist security advice as well as risk management solutions that take meticulous account of the specific requirements of each client.

Our vision is to be the recognised global leader in providing comprehensive security and risk management services in complex environments and emerging markets across the Middle East and Africa.

GardaWorld believes that the private security sector can only benefit from a continuously improving, properly regulated system of accountability and ethics. As we face changing missions, new responsibilities and increasingly complex and dangerous environments, we recognise that the need for transparency and oversight is greater than ever.

GardaWorld remains committed to setting and adhering to the highest ethical standards, as reflected in our Code of Business Ethics and Standards of Conduct (the "GardaWorld Code") and Human Rights and Professional Standards policy (see <a href="https://www.garda.com/about-us/governance-and-compliance">https://www.garda.com/about-us/governance-and-compliance</a>). All employees, advisors and sub-contractors sign up to an internal code of ethics that insists on integrity in all areas of commercial and personal behaviour. These are all set out in the GardaWorld Code.

In 2013 GardaWorld became one of the founding members of the International Code of Conduct Association (ICoC(A)) and in April 2015 GardaWorld was one of the first companies to be approved by the ICoC(A) as a transitional member under the Association's enhanced membership and certification processes. To date, GardaWorld is the only company to have shared documentation with the ICoCA for the purpose of testing Certification based on PSC.1. This formalises, in an international forum, our commitment to conform to the International Code of Conduct for Private Security Service Providers, the Voluntary Principles on Human Rights, UN Guiding Principles on Business and Human Rights and applicable international humanitarian law, human rights and customary laws and agreements. In May 2016 GardaWorld was the first company to be certified on a worldwide basis under the new ISO 18788 and we continue to maintain our certification through external and independent auditors evaluating our levels of service delivery and compliance.

The following core company values and standards underpin GardaWorld practice and guide everything that we do, from the strategic decision making to tactical level detail:

- <u>Integrity</u>. Integrity is an essential ingredient of trust and a core requirement of management. We promote a culture of honesty, openness and transparency, and an ethical and working environment based on trust and confidence. We are committed to protecting our clients' people and assets as if they were our own.
- <u>Trust</u>. We aim to create an environment where individuals can be trusted to take full
  responsibility for their own actions and behave with absolute professionalism at all times. We
  maintain an Oversight Board that provides governance and instigates a system of checking
  that we do what we say we do and ensuring we learn lessons so our clients can be assured
  of our professionalism.
- Respect. Even in the most difficult of circumstances we will treat each other with dignity and decency.
- <u>Vigilance</u>. We undertake to set the gold standard of delivery by adopting an energetic, vibrant and 'can do' approach and ensure that everyone understands their roles and responsibilities in order to attain the highest of standards.

# **OUR COMMITMENT**

The United Nations Global Compact's principles are reflected in our Company policies, standards and guidance which all flow from the GardaWorld Code. Our Code, our Human Rights and Professional Standards policy, and our Whistleblowing policy can be found on our Company's internal business management system accessible by all staff. We maintain our website to ensure transparency in our compliance approach and make it easy for third parties to access our complaints procedure. Communications continue to be carried out regularly with all personnel – from those in our Head Office to locally engaged personnel - to ensure they are familiar with these documents and that a culture of continual improvement is embedded in the organisation.

Below we provide evidence from our relevant policies on how we apply the UNGC's principles in our work; on how these have been mainstreamed into corporate functions and business units; and on the sustainability efforts and performance of the company in the last 12 months including implementation of our action plan in our 2016/17 communication on progress.

These commitments are expressed and incorporated into our Compliance and Operational Excellence Framework to ensure one coherent message is delivered throughout our business.

#### **HUMAN RIGHTS**

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and

**Principle 2:** make sure that they are not complicit in human rights abuses

### Assessment, Policy and Goals

Our commitment to the UNGC's principles on human rights is expressed in the GardaWorld Code, which states that:



- GardaWorld will only engage in legitimate security work which adheres to the principles of International Law, including International Humanitarian and Human Rights Law.
- GardaWorld does not condone, nor will it ever become involved in, the violation of human rights as embodied within the Universal Declaration of Human Rights and the European Convention of Human Rights.
- GardaWorld personnel respect the culture, religion and ethnic customs, human dignity and human rights of the communities and countries in which they work. They will to the best of their ability and wherever possible, rigorously oppose violation of these rights.

We have a specific policy dealing with Human Rights and Professional Standards which outlines the commitment to the UN Guiding Principles on Business and Human Rights, including guidance on human rights impact and risk assessments. Furthermore, although unable to participate formally in the extractives' industry Voluntary Principles on Security and Human Rights (VPs) due to our status as consultants, GardaWorld incorporates the ethos of the VPs into our day-to-day business conduct via the GardaWorld Code and our regular assessments of potential impacts to human rights, at both the strategic and operational level, of Human Rights risks and our potential impacts.

GardaWorld has robust policies requiring our sub-contractors to adhere to these principles. We have a supplier selection policy through which we determine whether potential suppliers meet the same standards and code of ethics and conduct on human rights. Only suppliers that can demonstrate evidence are included on our supplier list. Our due diligence approach includes where appropriate (dependent upon the area of operations and the work to be undertaken) assessing what training is provided by sub-contractors to their personnel, especially concerning human rights and anti-bribery and corruption.

### Systems and Monitoring

- <u>Statement of Conformance and Code of Ethics</u>. In order to maintain the highest ethical standards, GardaWorld ensures that all personnel sign a Statement of Conformance and Code of Ethics; every person's signed statement is kept on record.
- Whistleblowing. The Company encourages all workers to take responsibility for raising any concerns that they might have about any unethical malpractice or human rights abuses within the workplace. As such GardaWorld has a designated Whistleblowing Policy in order for any individual to report concerns about potentially dangerous, illegal or unethical workplace practices. The policy and procedures allow anonymity if it is requested. Any cases of whistleblowing are monitored by the Legal Department to ensure they are properly handled and that lessons are identified.
- Training for Operatives. To ensure that the ethos that we work to is properly understood by all deployed personnel, training is given which covers Geneva Convention, Hague Convention and International Humanitarian Law; Local Law; Human Rights Law (including anti trafficking in persons); Public International Law; the Montreux Document and UN Global Compact and, where relevant, Sharia Law. In addition, every member of staff receives mandatory training and participates in workshops on human rights including the UN Guiding Principles on Business and Human Rights. Personnel attendance on training courses is recorded and monitored and the requirement for continuation training is reviewed as part of regular performance reviews.
- <u>Policy Implementation</u>. Human Rights Impact Assessments are carried out six-monthly at the strategic level to review and ensure that all our policies, systems and procedures comply



with the requirements of salient human rights. Human Rights Impact Assessments are also carried out at the Head Office, when entering new markets or contracting with particular clients, to determine whether we are comfortable working in new regions or with new clients, and at the country and project level to identify any potential increased risk of negatively impacting human rights through our activities. All projects as part of the overall risk management procedures within our business conduct a specific Human Rights Impact Assessment in relation to their operations. Such assessments are reviewed every year as a minimum.

 <u>Policy Implementation</u>. Our Oversight Board meets at least once per quarter to drive continual improvement across the company, monitor Company performance against the Business Management System including through ensuring internal audit schedules are maintained, the monitoring of relevant data such as trend analysis of incident data and audit recommendations, and ensuring that lessons/improvements are incorporated into company policy, procedure and practices.

# Measureable Achievements since the last Communication on Progress (CoP)

In the last 12 months, GardaWorld has achieved measurable improvements in our processes, systems and culture; including the achievement of plans set out in our 2016 CoP. Examples include:

- We have maintained our certification to the international standard ISO 18788 that has human rights risk management at its heart, we were the first security company to achieve this level of certification and it is maintained across our worldwide operations.
- We have reviewed all of our policies and procedures contained in our Business Management System to ensure that best practices are incorporated into our operating procedures.
- We have maintained our internal Compliance and Assurance Audits that are conducted in all
  operational locations with employees, sub-contractors and our customers all participants in
  the audit through discussions conducted. Specific focus is placed on ensuring that the
  human rights of staff and people working on our behalf are maintained to the standards that
  we expect.
- We have continued to provide input and support to help build the ICoC(A) into an effective, high-profile organisation focussed on monitoring the health of the Private Security Sector globally. We have maintained involvement and communication directly in relation to the development of the ICoC(A)'s full membership requirements and its role in 'certification' of private security companies.
- We have continued to review and evaluate the effectiveness of our training provision in respect of human rights continuing the delivery of human rights training workshops throughout our business, specific to GardaWorld, to reflect the latest thinking on Human Rights including the UN Guiding Principles Reporting Framework and to assist our employees with transitioning their theoretical knowledge of human rights issues into a greater understanding of how these issues affect us and what impacts we can have in practice.
- We have maintained Human Rights Impact Assessments as part of our overall risk management approach at a project level throughout our business.
- We continue to cover Human Rights in our internal audits and review the results of the internal audits at every Oversight Board meeting.

• We have taken part in the review of the ANSI/ASIS PSC.1-2012 standard, which has a key focus on human rights, holding positions on the technical committee and working group as we continue to be involved as an industry leader in maintaining the standards.

### Plans for 2017/18

#### We will:

- Maintain our ISO 18788 status by the extending it to any new countries we commence business in (including those in which KK Security operates) and also to any newly acquired business units. We will continue to reinforce independent testing of our human rights, risk management and continuous improvement policies and procedures in every aspect of our business.
- Carry out our next annual review of our policies and procedures throughout 2017/18 to
  ensure that lessons are identified and continual improvement opportunities exploited. We will
  feed the results into our Business Management System as part of each and every Oversight
  Board.
- As an industry leader remain involved through various technical committees, working groups and professional bodies in the updating and review of industry standards.
- Continue to work with the ICoC(A) to develop its complaints and international monitoring functions as part of its development into an effective, high-profile, organisation focussed on monitoring the health of the Private Security Sector globally.

# **LABOUR**

**Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

**Principle 4:** the elimination of all forms of forced and compulsory labour;

**Principle 5:** the effective abolition of child labour; and

**Principle 6:** the elimination of discrimination in respect of employment and occupation.

# Assessment, Policy and Goals

GardaWorld has clear policies on all of the aforementioned issues as part of ensuring that the highest standards of welfare are provided for personnel whether in-house staff or contractors. GardaWorld prides itself on being a respected employer of choice and achieves this by providing competitive remuneration, the best available equipment taking account of the operating environment and other risks, safe and secure accommodation and life support relevant to the operating environment.

GardaWorld fulfils its responsibility for promoting equal opportunities and combating discrimination, seeking to ensure the full integration of each employee in his or her working environment regardless of ethnic or social origin, race, gender, religion, nationality, sexual orientation or other distinguishing characteristics.

Our commitment to the UNGC's principles on Labour is expressed in the GardaWorld Code which states:

# Working Standards

- Good working standards are crucial in the development of GardaWorld and the potential of our personnel. Maintenance of appropriate remuneration levels reduces the risk of staff turnover and through continuity of quality ensures a high level of efficiency.
- GardaWorld is committed to ensuring the best working conditions that the area of operation will permit.
- In accordance with this principle, the level of remuneration is designed to ensure that quality work is appropriately remunerated and encourages loyalty and continuity.
- There are many different occupational hazards associated with the nature of the work engaged in by GardaWorld. Appropriate medical support including psychological assessment is provided to ensure the maximum possible attention in the event of serious incidents and subsequent injuries to personnel.
- In line with these procedures, GardaWorld follows best practice by ensuring suitable insurance is always in place to cover medical issues, property and business risk.

# **Equal Opportunities**

- GardaWorld recognises its responsibility for promoting equal opportunities and combating discrimination.
- We seek to ensure the full integration of all personnel in his or her working environment, regardless of his or her ethnic or social origin, colour, gender, religion, nationality, sexual orientation or other distinguishing characteristics.
- We seek to ensure that its clients also recognise respect for these values in the working conditions made available to all personnel.

#### Systems and Monitoring

GardaWorld has implemented practices that prevent People Trafficking activities; such practices include performing our own recruitment and where this is not possible, undertaking due diligence on the recruitment companies that we use. This ensures that any person recruited is not being coerced, tricked, blackmailed or otherwise pressurised into accepting employment or conditions that would fall under the definitions of People Trafficking or Forced Labour. All personnel receive training to ensure awareness of the issue and a clear understanding of the applicable regulations. In addition, we have minimum age standards for our personnel which ensure that there can be no question of exploiting child labour: for example, GardaWorld exceeds the ILO standards prohibiting hazardous work for all under 21s: our minimum age for personnel carrying arms or otherwise engaged in potentially hazardous work is 23.

One of GardaWorld's core values is Respect. At GardaWorld all personnel are committed to treating each other with dignity and respect regardless of background or status and understand that each employee has a valuable contribution to make to the overall success of the company. These values are embedded into the culture of the Company alongside our other core values – Trust, Integrity, and Vigilance.

GardaWorld has a Grievance Process which clearly outlines the procedure that personnel can follow to ensure they can resolve any complaints or grievances relating to their employment.



Instances of grievances are monitored by the legal department and at the highest level by the independently-chaired Oversight Board.

GardaWorld is committed to identifying training and development needs of employees as well as monitoring and reviewing training and development at team and organisational levels. All employees have the opportunity to discuss and agree with their line manager any gaps in skills and/or performance against objectives. Monitoring that these discussions have taken place is part of the Company's performance pay regime.

# Measureable Achievements since the last CoP

We have delivered on our plans in our 2016 CoP and have implemented other improvements as part of our development of the company's Business Management System. Company examples are:

- We have completed a review and training needs analysis against the roles, responsibilities
  and expected duties of our personnel throughout our business to ensure that we continue to
  deliver the key requirements in ensuring that we deliver industry leading services and
  develop our personnel.
- We have developed and implemented a child labour remediation plan to ensure that in the
  unlikely and unexpected event of discovering the use of child labour in our supply chain
  when conducting due diligence that we have an agreed set of processes for dealing with
  such issues to ensure the welfare of the child.
- Continuation of project level training on HSE and Human Rights is ongoing throughout all of our regions. This includes continual upskilling of our locally hired workforce who are qualified trainers. This training is offered and delivered to clients when requested.
- We have reviewed all of our policies and procedures in our Business Management System
  to ensure that best practices and previous lessons identified from incident investigations and
  after action reviews have been incorporated into our operating procedures to ensure that we
  are continually improving and developing.
- Alignment of best practices used in due diligence procedures for dealing with and managing our sub-contractors.
- Alignment of all new business areas to the Business Management System and specifically the implementation of our OHSAS 18001 certified HSE management system across all elements of our business.
- Introduced 'town hall' meetings once per month with our local workforce on all contracts to
  ensure that welfare measures are maintained and continue to conduct monthly 'toolbox talks'
  that include a specific requirement for consultation with the workforce.
- The independently-chaired Oversight Board continues to receive regular reports on grievances/complaints and monitors that lessons have been learnt and applied across the organisation's activities in order to ensure a culturally respectful environment.
- Employment practices have been reviewed during the company's strategic and project HRIAs.

#### Plans for 2017/18

Roll out all relevant policies within KK Security companies.



Conduct our next annual review of our policies and procedures throughout 2017 to ensure that lessons are identified and continual improvement opportunities are exploited. We will incorporate the results into our Business Management System as part of every Oversight Board.

Review and introduce a variant of the industry standard Job Safety Analysis that is suitable
for our industry in which to support the risk management process and quarterly review. This
will the observation and documentation of the steps specific to a task to ensure that we are
identifying the key risks and implementing the necessary controls required.

#### **ENVIRONMENT**

**Principle 7:** Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

**Principle 9:** encourage the development and diffusion of environmentally friendly technologies.

# Assessment, Policy and Goals

Within the scope of our business activities, GardaWorld aims to promote respect and protection for the environment both at a local and global level. GardaWorld appreciates the advantages of a sustainable environment to the conduct of our business activities. Our commitment to the UNGC's principles on the Environment is expressed in our Environmental Policy (part of our HSE Policy) which states as follows:

Environmental Policy: It is GardaWorld policy to conduct its business throughout the world in a manner that protects and sustains the environment. To this end, the company is committed to the following:

- Incorporating environmental considerations into business decisions, including planning and design activities.
- Assessing environmental aspects and impacts of products, processes, and operations.
- Encouraging employees to adopt good housekeeping measures to save energy, use public transport and non-paper based communications where possible, and recycle paper and other office waste responsibly.
- Assure compliance with both the spirit and intent of local and national laws and regulations.
   In countries where laws and regulations do not exist or are inadequate, appropriate standards will be developed.
- Reporting environmental results to all stakeholders; including the setting and monitoring of environmental performance targets.
- Striving to make a positive environmental contribution to the communities where we operate.

### Systems and Monitoring

GardaWorld's Business Management Systems is externally certified to ISO 14001; environmental requirements and procedures are implemented across all operations.



GardaWorld Project Managers are fully trained in environmental aspect and impact assessments, including environmental impact mitigation. Environmental emergency contingencies are fully planned and rehearsed with both staff and sub-contractors at operational locations.

GardaWorld is committed not only to environmental sustainability but also to better social welfare and we are very proud of our socially responsible commitments to local communities in post-conflict environments in which we seek to provide immediate relief through low-cost, high impact, grass roots community projects such as water purification projects in Iraq.

All operational locations within their own HSE Plan implement a waste management plan with the emphasis on reduction at source, recycle or reuse prior to any waste treatment and the setting of objectives to improve environmental performance based on an impacts assessment.

GardaWorld adopts a prudent use of natural resources where possible and has implemented procedures for waste and energy reduction such as system defaults to double-sided printing, the use of paper from sustainable forests, lighting systems that switch off office lighting at the end of the working day and the tracking of vehicle mileage to reduce our environmental impacts.

### Measureable Achievements since the last CoP

The plans set out in our 2016 CoP have been taken forward including the following company examples:

- We were successful in developing and achieving certification of our Business Management System against the new and recently revised ISO 14001:2015 standard. This included the development our environmental aspects and impacts assessments to consider the lifecycle of services and activities involved in our day to day business.
- Review and replacement of our printers used in the Dubai Head Office to new and more energy efficient models.
- Setting and monitoring of targets in relation to the carbon emissions from flights in relation to our operational personnel in order to promote the use of environmentally friendly technology as a replacement to air travel for non-essential business requirements.
- Continued alignment of all new business areas to the Business Management System and specifically the implementation of our ISO 14001 certified HSE management system across all elements of our business.
- We have had a survey and alterations conducted to the air conditioning units in our Dubai office to ensure that they are running as efficiently as possible throughout the building.

# Plans for 2017/18

- Roll out all relevant policies within KK Security companies.
- To develop the way in which we monitor our carbon emissions from flights to an average
  value per person and to make individuals aware of what their carbon footprint relates to..
  This information will then be utilised to continue to promote the use of environmentally
  friendly technology as a replacement to air travel for non-essential business requirements;
  including a review of available technology to assist the company in achieving a reduction of
  our carbon footprint.

- Establish a methodology for measuring the performance of our vehicle fleet that relates to and compares the fuel consumption in relation to kilometres travelled, to allow the setting of a baseline and expected performance target for monitoring and identifying any potential inefficient vehicles that may require servicing or repair.
- To develop and implement across all of our regions a bi-annual environmental performance checklist that looks to identify any potential energy and cost savings for implementation on a project by project basis and of which will set localised performance targets. These targets will be reviewed at the Oversight Board meetings to establish their suitability and coherence with the overall GardaWorld strategic direction.

#### **ANTI-CORRUPTION**

**Principle 10:** Business should work against corruption in all its forms, including extortion and bribery.

# Assessment, Policy and Goals

GardaWorld is committed to the very highest of ethical standards in relation to business integrity. We have a Code of Ethics and Business Conduct that extensively and comprehensively demonstrates that we have a zero tolerance approach to corruption, including extortion and bribery.

Our commitment to the UNGC's principles against corruption is expressed in our Code of Ethics and Business Conduct and our recently implemented Anti-Bribery & Corruption Policy.

GardaWorld operates a value added outsourced service in high-risk environments, often in the undeveloped world. We wish to be the "best of breed" and as such it is essential that we set ourselves the very highest standard of ethics, conduct and procedures. GardaWorld – its employees, advisors, contractors and suppliers – must behave, at one and the same time, ethically and with integrity, whilst remaining a commercial organisation. All GardaWorld employees, contractors, or suppliers are, in one form or another, open to audit for compliance with this Code. The spirit of this Code applies not only to all employees of GardaWorld but also to any advisor, contractor, supplier or agent engaged by GardaWorld. This Code is not a contract and no contract is implied. If any part of this Code conflicts with applicable law, the law will prevail.

Detailed within our Code of Ethics and Business Conduct is policies relating to our "Ethical Business Practices" including anti-trust/anti-competitive behaviour and independent pricing, anti-boycott, international business, conflicts of interest and potential conflicts, all personnel, potential suppliers, current suppliers and subcontractors are required to certify that they have not and will not engage in bribery and corruption.

### Systems and Monitoring

Training is given to all staff in the GardaWorld Code to ensure that all employees are cognisant of all relevant policies. The Code is also emphasised during induction training.

Monitoring is carried out through regular internal audit reviews of financial systems; cash-box and cash-flow checks in operational areas; and monitoring trends and statistics at the Oversight Board.

#### Measureable Achievements since the last COP

The company has continued to pay significant attention to this important aspect of our Code of Business Conduct and has delivered on its plans for 2016/17. Company examples are:

- A review of our procedures relating to corruption that included a gap analysis of our Business Management System against the new standard ISO 37001 and the implementation of an Anti-Bribery and Corruption Policy and Fraud Risk Assessment Tool.
- We continued to look at and remove the use of cash where possible in our business to reduce the potential risks.
- We reviewed our gift and hospitality register procedures and ensured that these give clear state guidance limits in relation to all entities that GardaWorld may interact with; for example charitable donation limits.
- We continue to ensure that all personnel have been trained in and signed to the Code of Ethics and Business Conduct.
- We continue to ensure that personnel undertake anti-bribery and corruption training.
- The Oversight Board continues to monitor any risks and gaps in our processes and procedures, receives reports on gifts and hospitality and ensures that emphasising the importance of transparency are cascaded via the Management Boar.

### Plans for 2017/18

- Continue to implement the findings from the gap analysis against ISO 37001 throughout our business to ensure that our Business Management System is compliant to this standard (including in KK Security companies).
- The establishment of an Anti-Bribery, Corruption and Fraud Working Group to monitor performance and processes, including reporting findings to the Oversight Board.
- Review and implementation of supplier management procedures to continue to ensure that
  due diligence is conducted to the correct level required and to identify any further
  improvements that can be made e.g. payment being made electronically not order to
  minimise cash transactions.

#### **SUMMARY**

GardaWorld has pledged its commitment to conform with and promote the Global Compact and its principles. Each principle, as demonstrated, has been integrated in our Business Management System, policies, culture and day-to-day processes including monitoring and continuous improvement.

GardaWorld has continued to play a leading role in the introduction of arrangements internationally to improve standards in the private security industry including in relation to human rights, labour and anti-corruption. Through this broader action and advocacy in support of UN goals and issues, GardaWorld meets some of the requirements of Global Compact Advanced.

GardaWorld has continued to test its own policies and procedures against those set out in ISO 18788 and PSC.1, standards that build on the International Code of Conduct and challenges private security companies to achieve high standards against operational delivery and in particular to assess human rights, labour, anti-corruption, environmental and other ethical policies and procedures. The requirements of ISO 18788 and PSC.1 are unique in that the independent auditors not only assess policies and protocols at a company's head office but also the delivery of services



on the ground. We are justifiably proud to have been the first company certified to ISO 18788 and PSC.1 standard in addition to our certification to ISO 9001, ISO 14001 and OHSAS 18001.

In future we will ensure that we meet our assurance commitment to the Global Compact by continuing to publish an annual CoP, setting out our performance in articulating and implementing the ten principles into our overall functions and performance.