

United Nations Global Compact

GardaWorld Security Services Middle East & Africa - Communication on Progress

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PRESIDENT & COO STATEMENT OF CONTINUED SUPPORT

I am pleased in 2021 to once again pledge the support of GardaWorld Security Services Middle East & Africa (and its Business Units (Aegis Defence Services and KK Security) collectively referred to as "GardaWorld") as we participate in 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, champion and develop high standards across the private security industry; leading by example. The commitments discussed in this document are embedded in 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 Security Services Middle East & Africa continues to identify best practice relevant to our industry, in order to ensure that we keep building on our leading role to promote, create and implement a regulatory framework for the global security sector that has Human Rights, our people and the environment at its heart.

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 Security Services Middle East & Africa

GENERAL

GardaWorld Security Services Middle East & Africa is a division of GardaWorld, a Montreal 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, Belgium, Burundi, Democratic Republic of the Congo, France, Haiti, Iraq, Kenya, Tanzania, Libya, Malawi, Mozambique, Nigeria, Rwanda, Singapore, Somalia, Uganda, United Kingdom, United States of America, Yemen, and Zambia. We have substantial operating experience and a worldwide client base, including governments, international agencies and the international corporate sector.

We provide 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 primarily the Middle East, Afghanistan and Africa.

GardaWorld believes that the private security sector can only benefit from a continuously improving, suitably regulated system of accountability and ethics. As we face changing missions, new responsibilities and increasingly complex, dynamic and dangerous environments, we recognise that the need for transparency and oversight continues to be 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**”), Human Rights Policy, and Supplier Code of Conduct (the “**Supplier Code**”) (see <https://www.garda.com/about-us/governance-and-compliance>). All employees, advisors, sub-contractors and suppliers sign up to a code of ethics and conduct that insists on integrity in all areas of commercial and personal behaviour. These are all set out in the GardaWorld Code and the Supplier Code.

In 2013 GardaWorld became one of the founding members of the International Code of Conduct Association (ICoC(A)), and in August 2017 we became one of the very first companies to be awarded Full Membership of and certification by the ICoCA in recognition that our systems and policies meet the standards and practices derived from the Code. This membership formalises, in an international forum, our commitment and conformance 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 then new ISO 18788, and we continue to maintain our certification through external and independent auditors evaluating our levels of service delivery and compliance. We continue to undergo external audits each year by an independent audit body and

spread our knowledge and standards into the new markets that we enter, as well as educate and generate the correct culture in the companies that we acquire.

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

- **Integrity.** 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.
- **Trust.** 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.
- **Vigilance.** 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 policy, our Code of Ethics at the GardaWorld Group level, the Supplier Code and our Whistleblowing Policy can be found on our Company's Business Management System accessible by all staff and by third parties via our website. Senior Management communicate regularly with all personnel, ranging from those in our Head Office to our locally engaged personnel in country, to ensure they are familiar with these documents and that we embed a culture of continual improvement across our organisation.

Below we provide evidence 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 twelve months including implementation of our Action Plan in our 2020/2021 Communication on Progress.

These commitments are incorporated into our Compliance and Operational Excellence Framework to ensure one coherent message is delivered throughout our business; in addition to being monitored through our Oversight Board function (which meets not less than twice a year), and supported by our Business and Human Rights Working Group (which meets not less than four times a year).

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 and letter of International Law, including International Humanitarian and Human Rights Law.
- GardaWorld does not condone, nor will it ever intentionally 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 the violation of these rights.

We have a specific policy dealing with Human Rights which outlines the commitment to the UN Guiding Principles on Business and Human Rights, including guidance on Human Rights Risk and Impact Assessments (HRRIA). 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 on Human Rights, at both the strategic and operational level of Human Rights risks and our potential impacts. As fully certified members of the ICoCA, we comply with the Code and train our staff in its relevance to behaviour that might impact others Human Rights.

GardaWorld has robust policies requiring our sub-contractors to adhere to these principles. We have a supplier selection policy through which we determine whether suppliers meet the same standards and code of ethics and conduct on Human Rights, and GardaWorld's suppliers must acknowledge and confirm adherence to our Supplier Code. 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. This is not just a "desk-top" exercise, but rather generally involves visiting our suppliers and ensuring our staff remain vigilant to potential abuses.

Systems and Monitoring

- Statement of Conformance and Code of Ethics. In order to maintain the highest ethical standards, GardaWorld ensures that all personnel sign an acknowledgment form to confirm that they have read in detail, understand and will abide by the GardaWorld Code and international humanitarian laws. By making this acknowledgement, personnel are confirming that nothing in their past or present conduct contravenes our code.
- Whistleblowing. The Company encourages and expects all staff to take responsibility for raising any concerns about unethical malpractice or Human Rights abuses within the workplace. As such GardaWorld has a designated Whistleblowing Policy and a fully independent Whistleblowing Hotline. Any instances of whistleblowing are investigated with the Legal Department's oversight to ensure they are properly handled. In addition, each quarter a summary of whistleblowing cases are reported to the Governance Committee at the GardaWorld Group level in Montreal and to the Oversight Board.
- Training for Operatives. To ensure that the ethos that we work to is correctly 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 the International Code of Conduct (ICoC). Also, every member of staff receives mandatory training on Human Rights, including the UN Guiding Principles on Business and Human Rights.

- Policy Implementation. Human Rights Risks and Impact Assessments are carried out six-monthly at the strategic level to ensure that our policies, systems and procedures comply with the requirements of salient Human Rights. Human Rights Risks and 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. Such assessments are reviewed every year as a minimum.
- Policy Implementation. Our Oversight Board meets at least twice a year to drive continual improvement across the company, to adopt best practice and discuss topical issues which may impact upon Human Rights. The Oversight Board also provides a degree of monitoring to ensure that internal audit schedules are maintained, analysing relevant incident data and audit recommendations, and ensuring that lessons/improvements are incorporated into company policy, procedure and practices. It also provides a forum for discussion and debate of any potential ethical issues. The chair of the Oversight Board is required to maintain a robust element of independence and does not sit on any other board of the GardaWorld Group.

Measurable 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 2020 CoP. Examples include:

- We have maintained our certification to the international standard ISO 18788 that has Human Rights risk management at its heart. The scope of our worldwide certification to the international standards ISO 18788, PSC.1, ISO 9001, ISO 14001 and ISO45001 has been successfully extended across the entirety of the East Africa Business Unit, with the exception of DRC which will be certified in November 2021. We have rolled out our Business Management Systems across the East Africa Business Unit and continue to review our policies and procedures to ensure that best practices are incorporated into our operating procedures.
- We have launched a new international Code of Ethics in all business units and divisions across the Company. Forming part of the foundation of GardaWorld's Ethics and Compliance Framework, the Code contains a set of guiding principles designed to serve as a standard of conduct which all personnel are expected to commit to in their work.
- We have maintained our internal Compliance and Assurance audits that are conducted across all operational locations with employees, sub-contractors and clients all participants in the audit (including throughout COVID-19, adopting remote auditing practices as required). 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 ICoCA into an effective, high-profile organisation focussed on monitoring the health of the Private Security Sector globally. In October 2020, our Senior Director, Risk, Insurance and Welfare was elected to join the ICoCA Board of Directors, representing the industry At Large, for a three-year term. In this position she has contributed to the development of online training on Preventing and

Addressing Sexual Exploitation and Abuse (PSEA), the first online training course developed through ICoCA. We have continued to encourage the ICoCA Board to broaden its international search to add more governments to its membership, which we see as key to maintaining pressure on the security sector to improve globally. We have maintained involvement and communication directly about the development of the ICoCA'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. Training on Human Rights has been incorporated as part of induction training for all Security Officers across the East Africa Business Unit, which includes an awareness of the Voluntary Principles on Security and Human Rights. We have also continued 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 on communities and environments. We have implemented webinars across the business to provide coaching on the methodology for conducting good and effective Human Rights Risks and Impact Assessments.
- We have rolled out a refreshed, more effective and independently hosted Whistleblowing Hotline across all of our operating locations. The hotline caters for all of our working languages and ensures that any employee, contractor or supplier that has any ethical concerns about the business is able to file such concerns either via the internet or by speaking to an independent telephone operator. Across the East Africa Business Unit, independently hosted country-specific local hotlines are in place and a Toolbox Talk has been prepared to further enhance awareness on the topic.
- Our UK subsidiary published its annual Modern Slavery Act Statement in September 2020 as required under UK law. We also utilise the Modern Slavery Assessment Tool to ensure that our approach to countering the possibility of modern slavery is enhanced.
- We have maintained Human Rights Risks and 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. The Oversight Board also works to review and hold to account the outcomes of three Working Groups all linked to Human Rights.
- We have maintained and continue to promote our Supplier Code of Conduct (which draws on the GardaWorld Code as well as the UN Guiding Principles on Business and Human Rights, the Montreux Document and the ICoC to ensure that our suppliers support GardaWorld in their commitment to protecting the Human Rights of all persons who may be impacted by our activities.
- We have implemented a new Sanctions Policy which ensures that we are not inadvertently engaging with any person, client or supplier across our operations who is the subject of sanctions.
- We have worked to further enhance the standards of accommodation for all our personnel, and in particular our Third Country National (TCN) personnel, to ensure equality of standards and treatment between TCNs, Local Country Nationals (LCNs) and Expats wherever possible.

- As part of initial risk assessments upon the awarding of new contracts, site surveys are conducted which include criteria on basic Human Rights including access to shelter whilst on site, access to drinking water and access to sanitation facilities.
- We have recognised the ongoing challenges that COVID-19 has brought globally, especially to our international workforce who have experienced continued difficulty with travelling home and the financial impacts that the service reductions have had on personnel. We have continued to provide support through our Welfare Team, chartered special flights to rotate personnel and have liaised with our workforce when and where possible to ensure redundancies have been kept to a minimum.
- We have continued to run a Business and Human Rights Working Group to support our Oversight Board function by ensuring resources and time are provided for key stakeholders to ensure oversight of this important area.
- We have reviewed and revised our Human Rights Policy.

Plans for 2020/21

We will:

- Maintain our full membership of the ICoCA, and our PSC.1-2012, ISO 18788, ISO 45001 and ISO 14001 certification, as well as extend certification to our operations in DRC. 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 2021/22 to ensure that lessons are identified and continual improvement opportunities exploited. We will feed the results into our Business Management System as part of every Oversight Board, supported by the Business and Human Rights Working Group.
- As an industry leader we will remain involved through various technical committees, working groups and professional bodies in the updating and review of industry standards.
- Continue to work with the ICoCA to refine 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. Our Senior Director, Risk, Insurance and Welfare will continue to serve on the ICoCA Board of Directors and represent GardaWorld in continuing to develop the work of the ICoCA.
- Continue to ensure the implementation of the Supplier Code to confirm that our suppliers understand the expectations and commitment required about Human Rights for their workforce as a GardaWorld approved supplier.
- Roll out an enhanced an Due Diligence process to reduce the risk of inadvertently contracting with a party who has recently engaged or continues to engage in Human Rights abuses.
- Continue to roll out the new Code of Ethics at the Group level, ensuring that this is integrated into employee and contractor onboarding materials and into training modules to be completed by all personnel.
- Revise our Code of Business Ethics and Standards of Conduct (The GardaWorld Code) as required to ensure that this exists cohesively and in alignment with the new Code of Ethics at the GardaWorld Group level.

- Continue to promote the new Whistleblowing Hotline, including through the delivery of Toolbox Talks across the East Africa Business Unit, designed to further enhance awareness on the topic.

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 issues above to ensure 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

- Ethical 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. We ensure that 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 our clients and our suppliers 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 self-performing recruitment activities 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, including the UK's Modern Slavery Act 2015. 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 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.

Measurable Achievements since the last CoP

We have delivered on our plans in our 2020 CoP and have implemented other improvements as part of our development of the company's Business Management System. Company examples are:

- We have rolled out our policies, procedures and systems across companies that we continue to acquire.

- We have launched a new international Code of Ethics in all business units and divisions across the Company. This contains a set of guiding principles designed to serve as a standard of conduct which all personnel are expected to commit to in their work.
- Our UK subsidiary has continued to publish its Modern Slavery Act Statement annually since 2017, last doing so in October 2020. We have also utilised the Modern Slavery Assessment Tool to ensure that our approach to countering the possibility of modern slavery is enhanced.
- 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 implemented a new QHSE Management Training Package for our management teams that consists of a total 44 hours of training covering key aspects of our management systems and the standards expected by the company.
- We have rolled out a refreshed, more effective and independently hosted Whistleblowing Hotline across all of our operating locations. The hotline caters for all of our working languages and ensures that any employee, contractor or supplier that has any ethical concerns about the business is able to file such concerns either via the internet or by speaking to an independent telephone operator. Across the East Africa Business Unit, independently hosted country-specific local hotlines are in place and a Toolbox Talk has been prepared to further enhance awareness on the topic.
- We have continued to strengthen our welfare support organisation to ensure that those in need can seek support in and outside the workplace should it be required. This support is delivered by a trained Welfare Team which includes a mental health nurse, and is supported by our new Welfare Ambassadors. We also engage external mental health support through the mental health specialists March on Stress and offer an extensive Employee Assistance Programme.
- 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 their reviews have been incorporated into our operating procedures ensuring that we are continually improving and developing.
- We have continued to ensure alignment of best practices used in due diligence procedures for dealing with and managing our sub-contractors.
- We ensure that personnel are permitted to, and aware of the trade unions they are able to, join. For some of our unions, collective bargaining agreements are in place to enhance certain employment benefits, over and above that required by law.
- The Oversight Board continues to receive regular reports on grievances/complaints and monitors that lessons have been learnt and applied across the organisation's activities to ensure a culturally respectful environment.
- Employment practices have been reviewed during the Company's strategic and project HRRIs.
- We have continued to undertake an additional layer of risk assessments, 'Point of Work Risk Assessments', that allow the process to engage the workforce completing the task to ensure that they are risk-aware and to increase the detail captured and the review of working practices.

- GardaWorld has maintained the Business and Human Rights Working Group meetings to ensure discussions on, review of and monitoring of our policies and implementation of standards in respect to ensuring that our code and standards are implemented across our operations. This Working Group, along with others, reports directly to the Oversight Board.

Plans for 2021/22

- Continue to roll out all relevant policies into recent acquisitions and integrations of businesses as we continue to grow our global footprint.
- Continue to ensure the implementation of the Supplier Code to ensure that our suppliers understand the expectations and commitment required concerning their workforce as a GardaWorld approved supplier.
- Conduct our next annual review of our policies and procedures throughout 2021/22 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.
- Roll out an enhanced Due Diligence process to reduce the risk of inadvertently contracting with a party who has engaged or continues to engage in Human Rights abuses.
- Deliver diversity and inclusion training across the business to further develop a diverse and inclusive culture and to reduce the potential for workplace discrimination.
- Ensure that our Business and Human Rights Working Group meets not less than quarterly to review and discuss pertinent topics to ensure the implementation of the GardaWorld Code and Supplier Code, as applicable, throughout our operations.
- Ensure that our UK Subsidiary reviews annually and, if necessary, amends and updates its Modern Slavery Act Statement.
- Continued rollout of the QHSE Management Training Course.

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 a 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 14001:2015; environmental requirements and procedures are implemented across all operations.

GardaWorld Project Managers are 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, grassroots community projects. An example of this are our water purification projects in Iraq.

All operational locations have an applicable HSE Plan, an implemented waste management plan, with the emphasis placed on reduction at source, recycle or reuse before 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.

Measurable Achievements since the last CoP

The plans set out in our 2020 CoP have been taken forward including the following company examples:

- Implementation of a bi-annual environmental performance checklist to identify any potential energy and cost savings for implementation on a project by project basis and the setting of localised performance targets.
- Continued reduction in the need for printing through the elimination of unnecessary documentation and changing our systems to permit digital signatures through secured electronic documents, as opposed to printing, signing and scanning records.

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- We have undertaken an assessment of the environmental measures in place across the Corporate London office, with opportunities for improvement identified. This has included opportunities to improve use of IT equipment to ensure optimised energy usage, and opportunities to improve recycling in the office.
- We have developed an action plan and undertaken initial actions to improve environmental aspects of the London office based on the environmental assessment. Environmental aspects have been identified for all of our operating locations as part of the rollout of the Business Management System, in addition to the creation of location specific Waste Management plans.
- We have implemented an additional layer of risk assessment, 'Point of Work Risk Assessments', that is done on each element of a task and incorporates identifying any environmental risks. This brings a level of granularity to our assessments to ensure their robustness. Training webinars are undertaken across the business for our management personnel, which include training on Environmental Aspects and Impacts to enable our workforce to implement this process to a good standard.

Plans for 2021/2022

- Continue to implement the 6 monthly environmental assessment checks across all projects and regional offices to identify ways in which we can reduce our impact on the environment.
- Continue to review printing needs throughout our business.
- Continue to implement further actions surrounding improvements to environmental aspects of our Corporate offices, including the reduction of energy usage and waste production and continued improvement surrounding the use of responsibly sourced materials.
- Undertake further reviews of environmental aspects and opportunities for improvement across the remainder of our Corporate offices, implementing identified actions from these as required.
- Continued implementation of webinars and training on environmental management and the conducting of environmental aspects and impacts assessments for our operational management teams to ensure that the assessments continue to be effective and relevant.

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. The GardaWorld Code 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 the GardaWorld Code and our Anti-Bribery & Corruption Policy.

Operating a value-added outsourced service in high-risk environments, it is essential that GardaWorld holds itself against 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 the GardaWorld 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 the GardaWorld Code are 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 employees are cognizant of all relevant policies. 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.

Measurable Achievements since the last COP

The Company has continued to pay significant attention to this critical aspect of the GardaWorld Code and has delivered on its plans for 2020/21. Company examples are:

- We continued to look at and remove the use of cash where possible in our business to reduce the potential risks. The Oversight Board has a particular focus on this issue.
- We continue to ensure that all personnel have been trained in and signed up to the GardaWorld Code.
- We issued a revised Anti-Corruption and Bribery Policy in December 2020.
- We have commenced the rollout of new Anti-Corruption and Bribery Training across the business. This has currently been undertaken in Kenya and across our operating markets in the Middle East.
- We rolled out a new Anti-Facilitation of Tax Evasion Policy in December 2020.
- We have launched a new international Code of Ethics in all business units and divisions across the Company. Forming part of the foundation of GardaWorld’s Ethics and Compliance Framework, the Code contains a set of guiding principles designed to serve as a standard of conduct which all personnel are expected to commit to in their work.
- 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 Board.
- Continued implementation of our Anti-Bribery, Corruption and Fraud Working Group with members from all different levels and functions of our business in attendance.

- We launched a new Competition Policy and rolled out mandatory training on Competition Law to complement this.
- We continue to conduct six monthly regional reviews/meetings to conduct a review of the regional specific risks around bribery, corruption and fraud.
- We have engaged in meaningful discussions with both clients and our supply chain on Anti-Corruption and Bribery measures as part of our zero-tolerance approach to corruption and bribery.
- We have continued implementation of our new Supplier Code which all suppliers working with GardaWorld are required to formally acknowledge.
- We have rolled out a refreshed, more effective and independently hosted Whistleblowing Hotline across all of our operating locations. The hotline caters for all of our working languages and ensures that any employee, contractor or supplier that has any ethical concerns about the business is able to file such concerns either via the internet or by speaking to an independent telephone operator.

Plans for 2021/2022

- Continue to review our Business Management System against best practices to ensure continued compliance with ISO 37001 and recognised best practices in relation to bribery, corruption and fraud.
- Continue the rollout of Anti-Corruption and Bribery training across the remainder of the business, including the remainder of our operating markets which make up the East Africa Business Unit.
- Roll out an enhanced Due Diligence process to reduce the risk of inadvertently contracting with a party who has recently engaged or continues to engage in Human Rights abuses or corrupt practices.
- Maintain Anti-Bribery, Corruption and Fraud Working Group meetings to monitor, evaluate and suggest risk mitigation strategies. The working group will continue to report to the Oversight Board for transparency.
- Continue to review and implement supplier management procedures 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 in order to minimise cash transactions.

SUMMARY

GardaWorld has pledged its commitment to conform with, participate in and promote the Global Compact and its principles. Each principle, as demonstrated, has been integrated into 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 challenge 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 ISO 45001.

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.