



Business Ethics Policy

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Preface and document control

This document is intended to provide information in respect of G4S Group Head Office policy, procedure, standards or guidance and will be periodically updated to reflect any changes due to business requirements or infrastructure. This document **MUST** be reviewed and approved by the designated G4S Group Head Office approver(s) to ensure technical accuracy and business validity.

Document owner and approver(s)

Owner	Group HR
Approver(s)	Group HR Director

Version control

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1.0	12/05/2011	1 st Formatted live document
1.01	12/08/2011	Live document including amends relating to Bribery Act legislation
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3.0	11/04/2013	Live document. Annual review and update to reflect new Human Rights Policy and Guidance
4.0	25/06/2014	Annual review and various amends including but not restricted to health and safety and standards of business practice
5.0	01/07/2015	Annual review. Minor amends
6.0	01/11/2017	Annual review. New values and new section on taxation added. Sections 1.2, 1.4, 3.5, 3.7, 4.1, 5 and 6.1 changed. Minor amends elsewhere
7.0	30/04/2019	Annual review. Removal of reference to Ethics Code. Section 3.3 on Harassment revised, and sections 5.1 and 5.3 updated in line with new Acceptable Use Policy. Sections 2, 3.5, 5, 5.2, 6, 6.1, 6.2 changed and minor amends elsewhere

Internal distribution list

Global leadership team and all managers	

External distribution

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The Business Ethics Policy

G4S's approach to business is based upon a core set of values known as the [G4S Values](#). These values reflect the standards we set for ourselves and the unique role G4S has in safeguarding people, property and assets across the world. They help us to attract and retain employees, to win and keep our customers and to obtain appropriate long-term investment in the Group – all of which contribute to achieving our goal of delivering outstanding customer service, providing engaging and rewarding employment and delivering sustainable profitable growth for shareholders. Demonstrating and living up to our values is the responsibility of every employee across the organisation.

Whilst our values guide our everyday actions, this Business Ethics Policy provides a more detailed explanation of our standards of operation to help managers and employees make the right decisions. The policy also sets out the expectations of our customers and other stakeholders.

It is essential that the ethical business standards set out in this policy are applied in all G4S businesses. Our senior managers are therefore required to show their personal commitment by regularly endorsing this policy and confirming compliance within their own areas of responsibility. All G4S senior managers are also required to ensure this policy is communicated annually to all managers.

We are committed to these standards and routinely monitor compliance across the organisation, taking remedial action whenever necessary.

The Business Ethics Policy also refers to Speak Out, our global whistleblowing hotline and web service which enables employees across the Group to report, in good faith, issues which they are concerned about or instances of potential breaches of this policy. Where these concerns are not being or cannot be addressed through your line manager, please do use Speak Out.

Ashley Almanza
Group Chief Executive Officer
G4S plc

Our Values



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6.2. Compliance monitoring

6.3. Adherence to policy

1. Standards of business practice

G4S is committed to high ethical standards in our business dealings.

1.1. Bribery and corruption

G4S is resolutely opposed to bribery and corruption in whatever form it may take.

Any payments or gifts made by or on behalf of G4S and which induce or are intended to induce someone to act improperly and payments, gifts or inducements to public officials to influence them in the performance of their duty (other than payments, fees etc. which they are entitled to demand by written law), are matters which will be investigated and may result in disciplinary action, including summary dismissal, against employees concerned.

Gifts or entertainment may only be offered to a third party if they are consistent with customary business practice in the relevant territory, are appropriate in value and cannot be interpreted as inducements. Guidance should be sought from the [Entertainment Policy](#). Where there is any doubt, further guidance should be sought from the relevant Regional, Divisional or the Group General Counsel.

Sales of the Group's services and products and purchases of services and products from suppliers will be made on the basis of benefit to the Group in terms of service, quality, performance, price, value and strong customer relationships. They will never be on the basis of giving or receiving inducements in the form of payments, gifts, entertainment or favours or in any other form. The [Commercial Sponsorship Policy](#) provides additional guidance to managers on this subject.

Employees should not accept gifts, money or entertainment from third party organisations or individuals where these might reasonably be considered likely to influence business transactions. Gifts, other than trivial ones with a low value, should be returned. This becomes even more important when a procurement decision is pending. In a culture where such an action might cause offence, the gift should be declared to the company and, either kept by the Company General Counsel or paid for by the recipient via a donation to an appropriate charity. Gifts can be recorded by using the [Gift Registration Form](#). Please note that although the financial limit for the recording of gifts has been set at £500, this does not change the Group policy stated above.

1.2. Political contributions

G4S does not make contributions to political parties, political candidates or political organisations and this policy should be followed worldwide. Any exceptions to this approach must be approved in advance by the G4S plc board.

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All G4S companies are bound by the rules which govern G4S plc. This means that approval from the shareholders of G4S plc at a General Meeting would be required for any significant political donation by any G4S company. Any request for approval should be submitted in the first instance to the relevant President or CEO for the region or division, who must refer the request to the G4S Company Secretary before any payment is offered or made. It is important to note that 'contributions' and 'payments' can include sponsorship of events and gifts in kind etc. not just cash donations.

1.3. Treatment of customers

Mutual trust and confidence between G4S and our customers is vital. All employees should strive to consistently deliver service excellence and value for money, meeting customers' expectations and anticipating their changing requirements.

Accurate understanding of both the customer's expectations and the company's obligations are vital and depend on open and clear communication with the customer.

Our goal is to understand the customer's needs and work jointly to deliver them. If during contract discussions we consider that a customer's interests are not well served in the long term by our proposals, we will make this clear even if it impacts negatively on our business.

Being open and honest with our customers also means that we will raise concerns with them if we become aware of any business practices or processes in their business which we believe are contrary to their values or may compromise our own values.

1.4. Treatment of suppliers

Our suppliers are entitled to fair treatment. It is our policy to pay suppliers in accordance with agreed terms of trade. We set high standards for our suppliers in the context of our own ethical policy. These standards are explained in our [Supplier Code of Conduct](#) and all suppliers are expected to comply with them or ensure that there is a clear timeline for full implementation within their own organisation and their associated suppliers and subcontractors.

1.5. Competition

G4S will always compete vigorously and in a fair and ethical way. Competitive success is built on providing good value and service excellence. When in contact with competitors, employees will avoid discussing confidential information and no attempt will be made to improperly acquire competitors' trade secrets or any other confidential information. Employees must not publicise, discuss or share with competitors (even indirectly) intellectual capital, pricing information or engage in any conduct or practices which would conflict with the laws applicable to the business concerned.

1.6 Taxation

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As outlined in its published Tax Strategy, the G4S Group operates in a large number of countries and is typically subject to tax in those jurisdictions. G4S is committed to managing its tax affairs responsibly and transparently. Appropriate policies and compliance processes to ensure integrity of tax filings and timely and accurate tax payments in all countries in which we operate have been established. We expect employees to comply with all applicable policies and compliance processes and to ensure they do not involve any G4S entity in tax evasion. In addition, employees must not knowingly facilitate the evasion of any tax by any non-G4S entity such as a customer, supplier or contractor.

2. Our approach to corporate governance

G4S is committed to promoting the long-term sustainable success of our company, generating value for our shareholders and contributing to wider society through compliance with the relevant legal and regulatory environments and careful management of business risks.

2.1. Compliance with the law

G4S complies fully with all relevant national and international laws and regulations.

It is the responsibility of all managers to ensure, by taking legal or other expert advice where appropriate, that they are aware of all local laws and regulations which may affect the area of the business in which they are engaged.

2.2. Accounting standards and records

All accounting documentation must clearly identify the true nature of business transactions, assets and liabilities in conformity with relevant regulatory, accounting and legal requirements. No record or entry may be false, incomplete or suppressed.

All Group reporting must be accurate and complete and in compliance in all material respects with accounting standards, policies and procedures, as outlined in the Group Finance Manual. Employees must not materially misstate or knowingly misrepresent management information for personal gain or for any other reason. Concerns that this may have occurred or will occur should be reported to the Group Financial Controller and/or the General Counsel or, if not appropriate, then via Speak Out, the global whistleblowing hotline and web service.

2.3. External reporting

G4S businesses may be required to make statements or provide reports to regulatory bodies, government agencies or other government departments. Care should be taken to ensure that such statements or reports are correct, and accurate. Senior management must be made aware of any sensitive disclosure before it is made.

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Care must also be taken when making statements to the media. Information which, if made public would be likely to have material effect on the G4S plc share price or about certain transactions such as mergers, acquisitions or disposals or transactions with related parties is subject to specific rules. Such matters should be referred to the Group General Counsel or Company Secretary. Enquiries from the media should be referred to designated company media relations experts and statements should only be made by spokespersons that have been authorised by Group Communications. Only authorised spokespersons are permitted to represent the company in media or investor relations.

G4S will provide, through the G4S corporate website and through the published integrated report and accounts and other statements, appropriate information to enable shareholders to assess our business performance. We will comply with applicable laws and stock exchange regulations as to the disclosure of information about G4S.

2.4. Policies and procedures

G4S recognises that there are risks associated with carrying out any business activity. Management is responsible for ensuring that policies and procedures are in place to manage risks and for complying with those policies and procedures. Employees should ensure that they are aware of the risks associated with their activities and that they comply with policies and procedures in place to manage those risks.

3. Our commitments to our employees

G4S is committed to optimising individual and business performance through employing the best people at all levels and creating an environment in which they want to and are able to contribute fully to the Group's success. To achieve a working environment in which team spirit and commitment to the goals and values of G4S are maintained, we all have a duty to ensure that individual employees are treated fairly and with dignity and respect.

3.1. National regulation

In dealing with its employees, G4S will act in compliance with national regulatory requirements and employers' obligations to employees under labour or social security laws and regulations must be respected.

3.2. ILO Declaration on Fundamental Principles and Rights at Work

G4S supports the four fundamental principles in the ILO Declaration. Thus, in accordance with local legislation and practice we will respect freedom of association and the right to collective bargaining. Employment will be freely chosen with no use of forced or child labour, and we will not discriminate on the basis of gender, colour, ethnicity, culture, religion, sexual orientation or disability and will abide by all anti-discrimination legislation in every jurisdiction where Group companies operate.

3.3. Harassment

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We expect all colleagues to be treated with integrity and respect. Harassment of any kind will not be tolerated. Harassment can be defined as unwanted behaviour, which is intimidating, upsetting, embarrassing, humiliating or offensive. Harassment (racial, sexual or of any other kind) of any employee is unacceptable. Should an employee believe, in good faith, that he or she has been harassed the matter should be raised with the relevant Human Resources Manager who will arrange for it to be investigated impartially and without delay. In the event that it is not possible or appropriate for the matter to be raised with the Human Resources Manager, Speak Out, the confidential whistleblowing hotline (see section 6.1), should be used.

3.4. Equal opportunity

G4S values all its employees for their contribution to the business. Opportunities for advancement will be equal and will not be influenced by considerations other than their performance, ability and aptitude. Employees will also be provided with the opportunity to develop their potential and, if appropriate, to develop their careers further with the company.

3.5. Health and safety

At G4S we are passionate about working safely and take great care to protect our colleagues and customers from harm. Our policies and standards target health and safety risks in the Group and all businesses must meet these standards in addition to complying with the relevant laws and our customer's health and safety requirements. This includes consulting employees on health and safety matters, providing them with safe and healthy working conditions, as well as appropriate training and equipment. It is our moral obligation to safeguard each other, our customers and those in our care. We require our leaders to set health and safety targets and personally lead continuous safety performance improvement in their businesses. We expect every manager to take responsibility for inspiring and leading their team to put health and safety at the forefront of their day to day activities.

3.6. Terms of employment

The businesses and their employees will work towards creating long-term relationships. Employees will be paid for and work hours at least as favourable as the terms established by national legislation or agreements or industry standards. Where none exist, the business will set standards by ensuring wages paid are market reflective and the hours worked are not excessive, regardless of local practices.

3.7. Employment screening

In order to protect the interests of its employees and customers, and because of the nature of its business, G4S will apply rigorous pre-employment screening and selection techniques.

Continued employment will be subject to satisfactory completion of the Group's screening procedures, or those of the individual employing G4S company, if the latter is more onerous. The screening standards continue to apply throughout employment and should an

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employee's security status alter such that he or she no longer meets the qualification requirements, their employment will be terminated, with or without notice as appropriate.

For some jobs employees are legally required to hold a formal licence or qualification. In the event that an employee is unable to obtain a licence or qualification required for their role as set out in their contract of employment, or the licence or qualification is withdrawn or revoked, his or her continued employment will be reviewed and may be terminated depending on the circumstances, including the availability of jobs which the company considers to be suitable alternatives.

Should an employee be convicted of any offence relating to dishonesty or should he/she be sentenced to a probationary order or spend time in prison custody, action may be taken (up to and including summary dismissal) depending on the circumstances of the case in accordance with the relevant disciplinary policy.

4. Our approach to being a good corporate citizen

G4S is committed to being a good corporate citizen, taking account of the economic, social and environmental impact of our business and aiming to maximise the benefits and minimise any negative impact of our global operations.

4.1. Human rights

G4S is committed to fulfilling its responsibilities on human rights around the world by applying the United Nations Guiding Principles on Business and Human Rights (2011). This commitment is reflected in the [G4S Human Rights Policy](#).

The Guiding Principles affirm four international standards that have achieved broad international consensus as a human rights baseline for all businesses:

- The Universal Declaration of Human Rights (1947)
- The International Covenant on Civil and Political Rights (1966)
- The International Convention on Economic, Social and Cultural Rights (1966)
- The International Labour Organisation Declaration on Fundamental Rights at Work (1998)

The G4S Human Rights Policy demonstrates our commitment to respect human rights and embodies our particular understanding of their significance for a global security group of our scale and diversity. It also sets out the requirement for the conduct of all employees in the group and those with whom we do business. In addition, the [Slavery and Human Trafficking Statement](#) describes the actions we have taken in relation to specific human rights issues such as the prevention of modern slavery.

4.2. The environment

G4S will conduct its business with respect and consideration for the environment. We will strive actively to reduce the Group's overall impact on the environment by targeting annual

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reductions in our carbon intensity and the management of waste, water, vehicle emissions and energy consumption.

4.3. Local communities

G4S is fully committed to supporting and assisting the communities in which it operates through a variety of means including charitable fundraising, sponsorship of community projects and voluntary work by employees. We conduct our business with respect and consideration for the good of local communities, taking steps to minimise any disturbance as a result of our operations. We will also serve local interests by providing good employment opportunities and effective services and products and paying a fair wage which supports a reasonable standard of living for our employees and their families.

5. Employee commitments to G4S

Employees have a duty to promote the interests of the company.

This policy cannot anticipate every eventuality where actions of employees may conflict with our ethical standards. Employees are therefore expected to exercise good ethical judgement even when circumstances might not otherwise specifically violate this code of conduct or where specific laws or regulations do not apply. Managers represent the company and our values at all times and must not engage in any behaviour, in or outside of work, which could bring the company into disrepute. If in any doubt, employees should consult local legal counsel.

One of our core values is 'We act with integrity and respect'. This is a reflection of the fact that our business activities are built on trust, honesty and openness. It is important that such trust, honesty and openness are maintained at all times. As a result, employees will be expected to comply with any requirement contained in their contract of employment to disclose issues relating to their employment screening. This could include him/her being cautioned or charged with any criminal offence or being the subject of a private prosecution for example for financial irregularity. Failure to disclose such information may result in disciplinary action up to and including summary dismissal. Knowledge or reasonable suspicion that any other employee has committed or plans to commit any serious wrongdoing or serious breach of duty or other act which might materially damage the interests of G4S must also be disclosed.

5.1. Confidential information

Employees must not make use of confidential information obtained through their employment for personal gain. The disclosure of confidential information to any third party during or after employment is not permitted unless the disclosure has been appropriately authorised, is for a legitimate business reason and the information is being communicated securely. 'Confidential information' is either information that has been described specifically as being confidential or is otherwise obviously confidential from the surrounding circumstances.

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The [Acceptable Use Policy](#) explains how employees are expected to protect the confidentiality and integrity of business information in all formats, including hard copy, so that it cannot be inappropriately altered or disclosed to anyone who does not have a legitimate right to it. The use of USB (mass storage devices), file sharing on unapproved systems or private networks, and leaving G4S devices (such as laptops) unprotected, is not permitted.

The term 'confidential information' does not include information in the public domain or information which the individual concerned is required by law to disclose.



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5.2. Conflicts of interest

Every employee has a duty to avoid business, financial or other direct or indirect interests or relationships which conflict with the interests of the company, or which divides his or her loyalty to the company. Examples of such potential conflicts would be a personal investment, personal or family connection with a competitor, customer or supplier. Any activity which could constitute a potential conflict must be avoided or terminated unless, after disclosure to the appropriate level of management, it is confirmed in writing that the activity does not constitute a conflict of interest and is not detrimental to the reputation and standing of the company.

5.3. Social networking

Employees have a duty to promote the interests of the Group/Company. When engaging in social networking on websites or in groups which show any association with, or make reference to G4S, employees are expected to behave in ways that are consistent with our G4S values and policies. This includes verifying the identity of people who request connections and only accessing links from trusted sources in case they lead to banned or unethical sites. Employees must ensure that the company is not exposed to legal or reputational risks and the safety and security of employees, customers and the general public are not undermined.

6. Implementation

This Business Ethics Policy is published widely in G4S including on the global intranet and corporate website. The policy must be adopted by all companies as a minimum standard and issued to all G4S managers and relevant specialists. Senior leaders will be asked to confirm compliance on an annual basis and ethics training will be provided.

For all new managers, employment contracts or written statements will include the Business Ethics Policy with a signed copy retained on file for audit purposes.

Implementation of and adherence to the Business Ethics Policy is monitored as part of G4S compliance processes. The policy will be reviewed annually. Where G4S companies already have their own published ethics policies, these must be reviewed against this Group policy to ensure they meet the same minimum standards.

For frontline and administration staff, details of the standards of behaviour expected of them in accordance with our values will be provided as part of induction training and on an ongoing basis.

6.1. Staff complaints, concerns and suggestions

Staff can expect that the company will give due consideration to their constructive suggestions and will provide a considered and objective review of genuine concerns and complaints.

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Concerns such as pay related queries, uniform issues, co-worker disputes or general grievances should in the first instance be directed to your line manager, supervisor or to the local Human Resources team by following the available local channels. In some instances, G4S businesses provide a hotline for employees to raise such concerns for investigation and resolution by senior management locally.

Concerns about potential unethical behaviour such as concerns regarding fraud, misrepresentation, theft, harassment, discrimination and non-compliance with regulations, legislation, and G4S policies and procedures should be reported to your line manager or local G4S legal manager. In the event that this is not possible or appropriate, the matter should be reported to the relevant G4S Regional Legal Counsel or via Speak Out, the global whistleblowing hotline and web service (www.g4s-speakout.com). Employees may do this anonymously if they so wish. To ensure that confidentiality is maintained, employees should not discuss such concerns with other third parties, unless specifically authorised or unless it is a legal requirement.

Business leaders are required to make their employees aware of both the Speak Out service including the relevant free telephone number and calling instructions for their country of operation.

6.2 Compliance monitoring

We monitor, on a regular basis, compliance with this ethics policy, using information reported via Speak Out, internal/external audit and ongoing management reporting.

6.3 Adherence to policy

Since G4S aims to maintain high ethical standards in carrying out its business activities, practices of any sort that are incompatible with the Group's principles and policies are not tolerated. Strict adherence to these principles and supporting policies is a condition of employment in the Group. Any action by an employee, which deliberately or recklessly breaches this ethics policy, may result in disciplinary action and where appropriate, criminal proceedings will be instituted.

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