

# SLAVERY AND HUMAN TRAFFICKING STATEMENT (2019)



This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 for the year ended 31st December 2019. It sets out the steps that we have taken to identify and reduce the risk of modern slavery occurring within our supply chain and business operations.

## Commitment and approach

G4S is committed to the respect of human rights and the continued development of an ethical and sustainable business model. We encourage the improvement of industry standards, the provision of decent employment opportunities and create secure and stable communities around the world.

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

Any human rights abuse is completely unacceptable and will not be tolerated under any circumstances.

We are fully committed to improving our systems and controls to help ensure that modern slavery and other human rights violations do not occur in any of G4S's business operations or supply chains.

We recognise the challenge in identifying modern slavery and human trafficking risks or practices, and understand that no global organisation can be complacent nor have complete certainty that it is not present within its organisation or supply chain. We have made good progress, but will continue to look for ways to enhance the protection of workers in our organisation and supply chain.

At G4S, we utilise a range of information sources to help us identify potential modern slavery risk areas. These include engagement with NGO's and other independent experts such as the UN Global Compact's Modern Slavery Working Group, Ecovadis, and the Norwegian Council on Ethics. As a result, we continue to focus our efforts on mitigating these risks in both our supply chain and the employment of migrant workers in the Middle East and Asia.

## Organisation

With its headquarters in the UK, G4S is the world's leading, global, integrated security company. We specialise in the provision of security and related services to a diverse range of customers across six continents. We operate in over 90 countries and provide a broad range of services often in complex environments and sectors.

Further information on our organisation and business model can be found in our Integrated Report for 2019 ([integratedreport.g4s.com](https://integratedreport.g4s.com)).

## Our supply chain and Supplier Code of Conduct

We strictly prohibit the use of modern slavery in G4S's supply chain and accept the shared responsibility with our suppliers to operate in an ethical way and to respect international human rights standards, including the prohibition of forced or coerced labour.

There are currently around 45,000 suppliers supporting G4S's worldwide operations with a broad range of goods and services, including uniforms, technology, catering, professional services and equipment.

Our [Supplier Code of Conduct](#) sets out G4S's requirements and expectations with respect to key areas of responsible procurement, including the prevention of modern slavery and human rights violations.

All suppliers to G4S are expected to comply with the principles set out in the Supplier Code or to commit to a clear timeline for full implementation within their own organisation, as well as their associated suppliers and subcontractors.

To help ensure that these principles are met, we have increased our engagement with suppliers, particularly those categorised as potentially high-risk with regards to modern slavery.

In 2019, we partnered with [EcoVadis](#), a sustainability rating agency, to design an international programme which is helping us to ensure that our suppliers in high-risk categories are meeting the ethical standards of our Supplier Code of Conduct.



The programme requires in-scope suppliers to complete an assessment tailored to their industry, size and location. The assessment covers 21 criteria across the four sustainability themes of environment, labour and human rights, ethics, and sustainable procurement.

The supplier's responses are analysed by EcoVadis, who provide both the supplier and G4S with a detailed report setting out the supplier's sustainability performance. Where their performance does not meet the required levels, a corrective action plan must be submitted to address the shortcoming.

To deliver the programme, G4S procurement teams receive briefings on modern slavery to help build an understanding of the issues and awareness of the risk within the supply chain. Alongside these briefings, wider communications have been issued by senior management to employees about modern slavery in the supply chain and G4S's commitments.

The programme has been implemented across our UK businesses, where around 5% of suppliers to our UK businesses have been categorised as potentially high-risk, including uniform and electronics manufacture, cleaning and temporary labour. To date 109<sup>1</sup> EcoVadis assessments have been completed. We are pleased that 96% of supplier's scorecards have achieved a satisfactory rating, we are engaged with those who have not achieved a satisfactory rating or who have declined to participate in the programme.

In addition, we have worked with EcoVadis to further enhance our supplier risk mapping process, which will provide a greater level of detail around potential modern slavery risks in our supply chain.

Our aim is to utilise this experience and apply the process internationally between 2020 and 2023. Implementation will focus on our top 15 highest spending businesses to cover 85% of G4S's total procurement spend. Ethical procurement guidance and due-diligence toolkits will be made available to all other markets.

We reserve the right to audit any of our suppliers and their subcontractors as part of any new contract of supply to confirm that the requirements set out in the Supplier Code are in force. Failure to participate in an EcoVadis assessment or to allow an audit may result in the termination of any supply contract. If an audit identifies levels of non-compliance with the Supplier Code, the supplier will be required to provide a detailed remedial action plan in order to continue doing business with G4S.

## Our business operations and our other policies

### Migrant worker welfare and employment practices

We ensure that our employment policies and practices are consistent with international conventions, including the UN Guiding Principles on Business and Human Rights and the ILO core labour conventions.

For G4S, the employment of migrant labour is necessary in a small number of countries<sup>23</sup>, where we employ around 30,000 migrant workers as the availability of local labour is scarce. We know that migrant workers are far from home and potentially vulnerable, and it is critical that we safeguard their welfare and human rights.

Our Migrant Workers Policy framework is based upon good practice principles and applies additional measures covering the use of recruitment agencies, accommodation standards and clear employment terms and conditions to help protect employees who are working away from their home country and the legal protections that this would provide them.

G4S is committed to ensuring the human rights of migrant workers (in the same manner as all its employees) are respected. Employment must be freely chosen with no use of forced, compulsory, bonded, indentured or child labour. We aim to offer decent work under terms which protect the health and safety of employees and ensure they are treated fairly, and with dignity.

<sup>1</sup> At 13th April 2020

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

<sup>3</sup> The G4S branded business in Qatar is not owned by the group. It is owned by the Al-Attia Group of Trading Companies (AGTC), which operates under a contract that entitles AGTC to use the G4S brand in Qatar. G4S proactively engages with AGTC to promote labour practices which comply with the ILO core labour conventions.

G4S businesses are required to self-assess against our employment standards and human rights controls on an annual basis and report on action to address any gaps. These are monitored by the Group Human Resources Department and Head of Government Affairs & CSR. The feedback from the self-assessment is consolidated to show year on year trends and highlight approaches where more guidance or support may be required. The self-assessments are supported by compliance reviews by local and regional teams and independently reviewed by the Group Internal Audit Department.

Since the beginning of 2019, we have taken additional steps to enhance our protection of migrant workers in the Middle East and Asia.

We have continued to improve our Migrant Worker Policy framework to help ensure that all migrant workers have freedom of movement without restriction and retain all their identity documentation, that employees fully understand the terms and conditions of the roles they are applying for and that these are not varied adversely.

In July 2019, a Migrant Worker Coordinator was appointed to conduct a programme of checks in both candidates home and destination countries to verify compliance with our Migrant Worker Policy and to confirm that employee's experience during the recruitment process was consistent with our standards. Where the Coordinator has established that these standards have not been met, appropriate remediation measures are made.

To ensure effective coverage of our migrant worker population, two additional Coordinators are being appointed, and to date, they have completed more than 1,900<sup>4</sup> direct surveys with migrant workers in UAE, Saudi Arabia and Bahrain. The programme will be extended to include other countries during 2020.

The programme checks cover a range of areas, including:

- The use of recruitment agencies and associated costs being borne by employees in the recruitment process.
- Consistency of conditions set out in initial offers with actual terms on arrival in the destination country.
- Freedom of movement and any issues that may restrict this such as the withholding of passports or application of unreasonable notice periods or bonded costs.

G4S has committed to the principle of 'Employer Pays' as set out in the Principles of the Leadership Group for Responsible Recruitment. Implementation of this principle begins in 2020, with the aim that all countries will be compliant by 2026.

New health and safety officers and welfare officers have been appointed to support the wellbeing of our migrant worker employees.

We continue to engage with the Council on Ethics for the Norwegian Government Pension Fund and other interested stakeholders, such as the ILO representative in Qatar and UNI, the global union federation with whom we agreed our [Ethical Employment Partnership](#) in 2008, and with whom we are working on a range of employment matters, including improving collective representation where possible in the Middle East.

In December 2019, Ashley Almanza (Group CEO) hosted a briefing with G4S's global leadership team (approximately 220 senior managers) to highlight the potential risk of modern slavery among our migrant worker population and to reiterate the company's commitment to ensuring that the welfare and human rights of all employees be protected and his expectation that all G4S business leaders to achieve this.

Early in 2020, we delivered modern slavery briefing sessions for the leadership teams in all G4S businesses employing migrant workers. While the focus for this programme was on our responsibilities to migrant workers, it also highlighted other potential modern slavery situations and how they may relate to G4S within our organisation, our supply chain and in our day to day operations.

Looking forward, the training programme will be adapted and made available to wider audiences across the group. We will also establish a Modern Slavery Steering Group, comprising a cross-functional team of subject matter experts from G4S, who will be charged with advising members of the Group Executive Committee on best practices to continue to combat all forms of modern slavery.

<sup>4</sup> 20th April 2020

**Other key policies which relate to the prevention of modern slavery are:**

Our [Business Ethics Policy](#), which defines what we consider to be acceptable and unacceptable business practices. The policy is reviewed and updated regularly and all senior managers are required to confirm their understanding of it and agreement to apply it within their areas of responsibility.

To ensure that our approach to business ethics reflects best practice and is suitable for driving the appropriate behaviours in a global workforce in 2020, we will be undertaking a thorough review of our policy and guidelines in this area and will relaunch a refreshed policy and framework this year.

Our [Human Rights Policy](#), which applies to all of the Group's businesses, defines our commitment to the Universal Declaration of Human Rights, the UN Guiding Principles on Business & Human Rights and the ILO's Declaration on the Fundamental Rights at Work.

We regularly review the global human rights environment to generate a heat-map. The 2019 review identified 23 countries, in which G4S has operations, as being high-risk environments for a range of human rights matters. These may include restrictions on civil liberties, high levels of corruption and the local attitude to labour rights and standards. The reviews findings are integrated into our risk and compliance processes and may trigger additional levels of assessment and internal audit where necessary.

Our [Whistleblowing Policy](#), which explains that every G4S colleague has a responsibility to ensure that we uphold our core values, adhere to the law and deliver against the important commitments set out in our Business Ethics Policy, Human Rights Policy, Supplier Code of Conduct and Human Resources Core Standards.

We encourage our employees to speak out and report any issues without fear of retaliation at [g4s-speakout.com](http://g4s-speakout.com) or via a confidential telephone hotline. All those raising concerns in good faith will be taken seriously and treated with respect.

G4S's Group Ethics Steering Committee oversees the delivery of our whistleblowing policy and conducts regular reviews of serious cases, investigation progress and resulting actions. In 2019, 555 cases were raised via Speak Out (2018:519). Every report is assessed and investigated further where appropriate.

One of the ways that we measure the confidence of employees to raise concerns is our regular Global Employee Survey. In 2019, 83% of the 454,644 employees who responded to the survey indicated that they felt able to raise ethical concerns at G4S via the available channels.

Despite the positive progress made in the area of whistleblowing, we are keen to ensure that our Speak Out service reflects best practice and is capable of meeting the needs of a modern workforce. Therefore, we have commissioned an independent review of our whistleblowing service by [Protect](#), a UK charity that advises on whistleblowing practices. We look forward to receiving their findings and will implement any suggested improvements.

Further information on the usage of Speak Out can be found in our [Integrated Report](#).



**Elisabeth Fleuriot**  
**Chair of the CSR Committee**

This statement was approved by the board of G4S plc on 14 May 2020 and signed on its behalf by Elisabeth Fleuriot, Chair of the CSR Committee, G4S plc.

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