



## Whistleblowing Policy

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## Preface and document control

This document is intended to provide information in respect of G4S Group 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)

<b>Owner</b>	Group General Counsel
<b>Approver(s)</b>	Group General Counsel

## Version control

Version	Version date	Document history
0.01	29/06/2011	1 <sup>st</sup> formatted draft
0.02	05/07/2011	2 <sup>nd</sup> formatted draft
1.0	12/08/2011	1 <sup>st</sup> live document
2.0	22/04/2013	Re-draft for discussion
2.1	30/06/2014	2nd live document
2.2	14/08/2015	2015/16 Update
2.3	1/04/2017	2017 Update

## Internal distribution list

All G4S employees	

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## Introduction

At G4S we all have a responsibility to ensure that we uphold our core business values, adhere to the law and deliver against the important commitments set out in our business ethics policy.

To help strengthen our culture of ethics and integrity, one of our core values, employees are strongly encouraged to report concerns about wrongdoing, such as breaches of laws, regulations or company policy. This will help G4S to develop an open culture in the dealings between its managers, employees and those with whom it engages.

The Group's whistleblowing policy is to be made publicly available and awareness of the whistleblowing system will be communicated regularly to every employee through a wide range of channels such as induction courses, welcome documentation, notice boards, intranets, and policy manuals.

## G4S Speak Out - Serious Wrongdoing

Speak Out is G4S' global whistleblowing system, hosted by an independent specialist hotline and case management provider.

Speak Out offers a free of charge telephone service and web-reporting, operating 24 hours a day, seven days a week with language translation facilities and provides a confidential channel for employees to report concerns about serious wrongdoing.

Contact details can be found on our company [website](#) and on our dedicated [Speak Out](#) website ([www.g4s-speakout.com](http://www.g4s-speakout.com)).

Serious wrongdoing is behaviour or actions such as major breaches of group policy or the law, actions that pose a real and significant threat to the wellbeing or safety of its employees or others or that may cause serious financial loss. Serious wrongdoing should usually be reported where appropriate to your line manager or local human resources manager in the first instance.

## Other Concerns

Other concerns such as pay-related queries, uniform issues, co-worker disputes or general employment grievances should be directed to a line manager, supervisor or local care-line.

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## Anonymity and Confidentiality

All concerns raised in good faith will be taken seriously and treated with respect. Any misuse or reporting of alleged wrongdoing that is known not to be correct is unacceptable and will be addressed by the company.

The most effective way to raise a concern is to do so openly. Openness makes it easier to assess the concern, investigate where appropriate and to obtain more information if required.

However, we understand that in certain circumstances, you may wish to report an issue confidentially. Subject to any legal restrictions, in all circumstances, G4S treats all information reported as confidential. In order to fully investigate issues raised and to comply with applicable laws and regulations, certain information relating to the issue will need to be shared. Anyone investigating a report will be required to keep all information confidential.

While we encourage you to identify yourself, anonymous calls will be taken equally seriously and investigated as fully as possible. However, the effectiveness of any investigation may be limited if you choose not to be identified. Subject to local legislative restrictions, it is your decision if you choose to remain anonymous and there will never be any attempt by the company to track or covertly discover a whistle-blower's identity.

## Process for Dealing with Whistleblowing Matters

Teamwork and collaboration is one of our core values and we believe that when issues arise, the best way to deal with them is for employees to do so with their managers and colleagues and resolve them together constructively. We expect our managers to encourage a culture where employees are confident they can raise concerns without fear of retaliation, and to respond to genuine issues raised by employees in a constructive way.

In the first instance we encourage you to raise your concerns through your normal reporting line, HR manager or the G4S lawyer that supports your team.

If, you wish to report a serious wrongdoing or the matter involves a senior manager (such as members of the business, country or regional management or the group executive committee) you can contact the G4S Speak Out hotline or [website](#) to report these matters.

Once the details have been logged by Speak Out, the Compliance and Ethics team will assess and respond to your concern, performing any necessary investigation in line with Group standards.

We will ensure that you are not punished in any way for raising a concern in good faith, even if it transpires it was unfounded or the information provided was inaccurate.

If you raise a concern you will be taken seriously and respected. Any harassment or informal pressure placed upon employees raising concerns will not be tolerated and will be

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treated as victimisation, which is a serious offence in accordance with company disciplinary procedures.

If however you misuse the Speak Out website or hotline, or you knowingly make false allegations, this would be unacceptable and would be treated as a serious disciplinary matter.

Subject to regional legislative restrictions, typical serious wrongdoings that may be raised using Speak Out include:

- Breaches of law or regulation
- Deception of customers or exploitation of customer relationships and/or standards
- Harassment or discrimination involving senior management
- Unsafe work conditions or health and safety risks
- Breaches of company policies, procedures or values by senior managers
- Bribery and corruption
- Criminal offences, violence or threats of violence by senior managers
- Misuse of confidential information
- Falsification, concealment or destruction of financial documents or accounting fraud
- Conflict of interest
- Price fixing, other cartel or anti-competitive activity
- Insider trading

Concerns raised through Speak Out will be assessed by the Compliance and Ethics team and followed up. Where required an investigator will be appointed to the case and the investigation will follow an agreed procedure and consistent group standards. The investigator may be internal or, if appropriate, external to G4S.

Any person raising a concern via Speak Out will be:

- Advised how their concern will be handled
- Given an estimate of how long the investigation will take
- Advised how to provide further information relevant to the investigation
- Advised, where appropriate, of the outcome of the investigation
- Advised that if he or she believes they are suffering a detriment for having raised a concern, that he or she should report this to the chair of the Ethics Steering Group or the chairman of the Group Audit Committee via [speakout@g4s.com](mailto:speakout@g4s.com)

## Governance and Oversight

The Whistleblowing Policy and general oversight of whistleblowing reporting and investigations practices are overseen jointly by the Group General Counsel, the Group Chief Financial Officer, and Group Human Resources Director.

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The Group Director of Risk and Audit has overall responsibility for assessing the effectiveness of G4S's confidential reporting and whistleblowing arrangements.

The G4S Ethics Steering Group and the G4S Audit Committee may also review the Group whistleblowing arrangements. The Audit Committee's objective is to ensure that the arrangements are in place and are effective.

The Ethics Steering Group, Audit Committee and CSR Committee will receive regular reports on caseloads and investigations into allegations of a serious nature.

Information about the effectiveness of G4S's Speak Out arrangements will be publicly reported within our annual CSR Report.



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