

Whistleblowing Policy

Doing the right thing

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1. PURPOSE

In keeping with our commitment to maintain the highest ethical and professional standards in all of our worldwide operations, Covered Persons (as defined below) and external stakeholders are strongly encouraged to report concerns about any perceived or suspected Misconduct (as defined below) either directly by the Company, its employees, officers or directors, or indirectly by the labor unions, contractors or suppliers the Company deals with in the conduct of its business. The sooner matters of concern are identified, the better the chances of effectively resolving them.

Accordingly, GardaWorld has established this Whistleblowing Policy (this **Policy**) to manage the receipt, retention and treatment of complaints and concerns received by the Company regarding activities believed to be illegal, dishonest, unethical or otherwise improper. This Policy provides clear guidance on the use of internal and external communication channels that will allow such concerns to be raised in confidence, and anonymously if desired, without fear of reprisals or retaliation of any kind.

2. SCOPE

Throughout this Policy, the words “GardaWorld” or “Company” refer to Garda World Security Corporation, its subsidiaries and its business units or divisions.

This Policy is mandatory and applies to all directors, officers, and employees of GardaWorld, and any person authorized to act on the Company’s behalf, such as third-party representatives and temporary personnel (collectively, **Covered Persons**).

The Ethics Hotline, our external and independent whistleblowing hotline and web platform further discussed herein, are available to Covered Persons, as well as to external stakeholders: any person, group, or organization directly or indirectly affected by an issue related to or caused by any of the Company’s operations or practices worldwide. This may include, but is not limited to, suppliers, contractors and customers (or any of their respective employees), non-governmental organizations, and/or members of the communities in which we operate.

The internal communication channels and the Ethics Hotline discussed in this Policy are not meant to provide emergency response or dispatch services and should, therefore, not be used to report events presenting an immediate threat to safety, life or property. Crimes or suspected crimes against person or property should be reported to local law enforcement.

3. GROUNDS FOR RAISING A CONCERN

As used in this Policy, the term “**Misconduct**” describes any unlawful, fraudulent, dishonest, or unethical action, conduct or activity engaged in by the Company or by Covered Persons.

Examples of Misconduct that should be reported in accordance with this Policy would include, but are not necessarily limited to, a perceived or apprehended violation of:

- applicable laws or regulations
- GardaWorld’s *Code of Ethics*
- GardaWorld’s *Suppliers Code of Conduct*
- the *Code of Conduct* of a specific business unit or division of the Company
- Company policies, including GardaWorld’s accounting policies or internal accounting control systems
- human rights practices

Additional and more specific examples of Misconduct that should be reported in accordance with this Policy are:

- acts of fraud, bribery, corruption, kick-backs or fraudulent reporting
- unsafe or dangerous working conditions
- threats or harassment
- risks to Covered Persons’ or to the public’s health and safety
- misuse of confidential information
- dangerous or environmentally damaging activity
- attempts to cover up the occurrence or likely occurrence of any of the examples of Misconduct referred to here in Section 3

Specific employment concerns, such as pay-related queries, uniform issues, co-worker disputes or general employment grievances, should be addressed directly with a line manager, supervisor or the Human Resources Department of the Company, as appropriate, rather than through the Ethics Hotline.

4. CONFIDENTIALITY, NON-RETALIATION AND ANONYMITY

GardaWorld recognizes that Covered Persons may not always feel comfortable discussing their concerns, especially if they believe senior managers are responsible for the Misconduct in question. Therefore, this Policy aims to ensure that concerns raised honestly and in good faith by Covered Persons will be treated with the appropriate degree of confidentiality, that no retaliatory action will be taken against them for reporting suspected wrongdoing and that, if they wish, concerns can be raised anonymously.

Information concerning a complaint and information obtained during an investigation resulting from the whistleblowing process will, to the extent reasonably possible, be kept confidential and will not be disclosed to others except on a “need to know” basis or as required by applicable law.

No person who, honestly and in good faith, reports Misconduct in accordance with this Policy shall suffer reprisals or retaliation of any kind, including threats or harassment, or, in the case of Covered Persons, any form of adverse employment action such as dismissal, demotion, suspension, threats or compensation decreases. The right of the whistleblower to protection against retaliation does not, however, include immunity for any personal Misconduct in which the whistleblower may have been involved.

Retaliation against a whistleblower who has reported any Misconduct in good faith is a violation of, and should immediately be reported in accordance with, this Policy.

A knowingly false complaint or report is also a violation of this Policy and sound judgment must be exercised to avoid baseless allegations. Any reporting of alleged wrongdoing that is known to be false or maliciously or frivolously made by the whistleblower may lead to disciplinary action, up to and including termination.

While Covered Persons and external stakeholders are encouraged to report Misconduct using management and direct communication channels, respectively, the Company has also put in place the external Ethics Hotline as the means through which Covered Persons or external stakeholders can make confidential and anonymous complaints, if they are more comfortable doing so.

5. REPORTING A CONCERN

Covered Persons or external stakeholders who believe Misconduct has occurred or will occur are encouraged to report their concerns in accordance with this Policy. The Company undertakes to investigate and respond in a timely and efficient manner to all complaints or concerns reported in good faith in accordance with this Policy. It should be noted that the seriousness, complexity and timeliness of the disclosure may impact the manner and speed with which an incident is reviewed, investigated and resolved.

A) COVERED PERSONS

In line with our core values – Integrity, Respect, Trust and Vigilance – we expect our managers and senior employees to foster a culture of openness in which issues can be addressed and settled in a constructive manner.

If you know or suspect Misconduct has occurred or is likely to occur, you are encouraged to promptly come forward with such information and first discuss the situation through normal internal management channels, unless you are uncomfortable doing so.

If you are not comfortable discussing the issue with your supervisor or if you have already discussed it with your supervisor but do not feel the issue has been adequately dealt with or resolved, you should then speak with a representative of the local Legal Department or the Human Resources Department of the Company.

However, if the Misconduct cannot be appropriately resolved by reporting through the internal management channels described above, whether because such reporting would not provide the necessary level of confidentiality, or because your local management is participating in or condoning the Misconduct that concerns you, we encourage you to raise the issue immediately via the Ethics Hotline or web platform operated by an independent third party (Convercent) accessible here: garda.com/ethicshotline, or via the Governance and sustainability section of the corporate website garda.com.

B) EXTERNAL STAKEHOLDERS

External stakeholders are encouraged to report any Misconduct via the Ethics Hotline or web platform operated by an independent third party (Convercent) accessible here: garda.com/ethicshotline.

External stakeholders who have concerns, issues or complaints of a purely commercial, rather than ethical, nature are invited to address them with their appropriate business contact at GardaWorld. Any concerns outside the scope of this Policy that are reported through the Ethics Hotline or web platform will be redirected to the appropriate channel and will not be the subject of any whistleblowing investigation.

C) CONFIDENTIAL EXTERNAL HOTLINE AND WEB PLATFORM

The Ethics Hotline and web platform are operated by Convercent, an independent, third-party service provider that receives, retains, records, and reports all incoming complaints received from Covered Persons and external stakeholders. The hotline and web platform are free to use and can be accessed 24 hours per day, 7 days per week.

When raising a concern either online or over the phone, Covered Persons and external stakeholders will be asked to provide as much specific information as possible, including names, frequencies, dates, places, events that took place and a description of the Misconduct.

A specific “access number” will be issued and associated with a password, allowing the whistleblower to follow the evolution of the investigation into the complaint.

Once a complaint is logged onto the independent platform, the appropriate investigation teams will be notified and the investigation procedures will start. Throughout the course of the investigation, the whistleblower and the investigator assigned to the case will be able to communicate through an anonymous communication channel integrated in the platform. As appropriate, the whistleblower may also be notified of the outcome of the investigation through that channel.

The investigation, the outcome of the investigation, any report prepared as a result of the investigation and any disciplinary action arising therefrom will remain confidential. Any breach of confidentiality may lead to disciplinary action being taken, including dismissal.

6. GOVERNANCE AND OVERSIGHT

This Policy and general administration of whistleblowing reporting and investigation practices are overseen jointly by the Chief Security Officer, the General Counsel, the Chief Financial Officer, and the Corporate Secretary.

The Governance Committee of the Board of Directors will receive regular reports on caseloads and investigations into allegations of a serious nature, including, as appropriate, on the findings, investigation results and any remedial actions, and the Audit Committee will be notified of matters relating to questionable accounting practices, deficiencies in internal accounting controls or audit issues.

Information about the effectiveness of this Policy and the external hotline and web platform will be reported publicly.

7. ADDITIONAL INFORMATION

This Policy is meant to serve as a guideline for disclosing Misconduct. Nothing in this Policy is intended to create any contractual obligations on the part of the Company towards any person, and the Company reserves the right to modify or deviate from this Policy in its sole discretion, consistent with applicable law.

Employees with questions regarding this Policy should contact the Chief Security Officer at ethics@garda.com.

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