



## 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)

|                    |                                 |
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| <b>Owner</b>       | Group General Counsel           |
| <b>Approver(s)</b> | Group Ethics Steering Committee |

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| 0.02    | 05/07/2011   | 2 <sup>nd</sup> formatted draft |
| 1.0     | 12/08/2011   | 1 <sup>st</sup> live document   |
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| 2.2     | 14/08/2015   | 2015/16 Update                  |
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## Internal distribution

All G4S employees

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## Version control

### External distribution

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## Introduction

At G4S, our values are the standards which we set for ourselves. They are reflected in the culture of our organisation and demonstrated through our behaviour and actions. They influence what we say and do and how we interact with each other, our customers, and those in our care.

|   |   |  |
|---|---|--|
| <p><b>WE ACT WITH...<br/>INTEGRITY AND<br/>RESPECT</b></p> <p>Our business activities and relationships are built on trust, honesty and openness. We do what we promise and always strive to do the right thing. We listen. We treat our colleagues, customers and those in our care with the utmost respect.</p> | <p><b>WE ARE PASSIONATE<br/>ABOUT...<br/>SAFETY, SECURITY AND<br/>SERVICE EXCELLENCE</b></p> <p>We are passionate about working safely and take great care to protect our colleagues and customers from harm. We are experts in security and use that knowledge to protect our customer's assets. We keep our promises and are passionate about delivering high levels of customer service.</p> | <p><b>WE ACHIEVE THIS<br/>THROUGH...<br/>INNOVATION AND<br/>TEAMWORK</b></p> <p>We invest in technology and best practice to continuously improve the products and services we offer. We challenge ourselves to find new ways of helping our customers achieve their goals. We work together as a team, valuing everyone's contribution, to ensure we achieve the best results for our customers and our business.</p> |
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We all have a responsibility to ensure that we not only uphold these values, but that we also adhere to the law and deliver against the important commitments set out in our **Business Ethics Code**.

In order to ensure that we always 'Act with integrity and respect', it is critical that we have an effective process in place so that colleagues are able to confidently raise concerns if they believe any behaviours are falling short of our values. Supporting these with effective communications which explain how concerns can be raised, quickly, in confidence and without fear of reprisals, is equally important.

Just having a reporting system in place that everyone knows about is not enough. If you have concerns about the conduct or behaviour of your colleagues or any wrongdoing by G4S representatives, we strongly urge you to **Speak Out**.

Wrongdoing may include bullying and harassment, discrimination, unsafe working conditions or practices, unethical behaviour or criminal acts. In reporting your concerns about the conduct or behaviour of your colleagues or any wrongdoing, you will help us to ensure that we all follow our values and continue to develop an open culture at G4S.

The Group's Whistleblowing Policy has been made available publicly and information on how to raise concerns with managers or via the **Speak Out** system are communicated regularly to every employee, both on joining the company and thereafter on an ongoing basis. We want to ensure that everyone in G4S understands the importance of raising concerns and is confident in doing so. A wide range of channels such as induction courses, welcome documentation, notice boards, intranets, websites, values communications materials, training and policy manuals will help to reinforce and remind you of the behaviours which are expected of G4S employees and how to report concerns if you believe the behaviour of others falls short of our values. (**G4S Hub: Speak Out**)

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## G4S Speak Out

Speak Out is G4S' global system for raising concerns. It is hosted by an independent and confidential specialist hotline and case management provider.

Speak Out offers a free of charge telephone service and a dedicated web-reporting platform ([g4s-speakout.com](https://g4s-speakout.com)). It is available 24 hours a day, seven days a week, with language translation facilities and provides a confidential channel for colleagues and other stakeholders to report concerns about wrongdoing at G4S.

The contact details can also be found on all G4S intranets and websites.

Everyone in G4S is responsible for reporting behaviour or actions such as breaches of group policy, law or G4S Values (including actions that pose a threat to the wellbeing or safety of our colleagues and others such as people in our care) that may damage G4S's reputation or cause financial loss.

## Other Concerns

If you have other concerns, such as pay-related queries, uniform issues, co-worker disputes or general employment grievances you should, in the first instance and where feasible, raise these with your supervisor, line manager or through your HR manager.

## Anonymity and Confidentiality

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

However, we understand that in certain circumstances, you may wish to report an issue confidentially. In all circumstances, subject to any legal restrictions, 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 with those investigating the matter. Anyone investigating a report will be required to keep all information confidential.

Anyone who raises a concern will be taken seriously and treated with respect. However, any misuse of Speak Out, such as knowingly making a false allegation, is unacceptable and will be treated as a serious disciplinary matter.

While we encourage you to identify yourself so that our investigators can engage with you throughout the process, anonymous calls will be taken equally seriously and investigated as fully as possible. 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 whistleblower's identity. However, the effectiveness of any investigation may be limited if you choose not to be identified. Additionally if we do not know who you are, we will be far less able to protect you.

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## Process for Dealing with Speak Out Matters

Working together as a team is a core G4S value and we believe that when issues arise, the best way to deal with them is for you to do so with your managers and colleagues and resolve them together constructively.

We expect our managers to encourage a culture where you are confident that you may raise concerns without fear of retaliation and that you will be taken seriously. We expect our managers to respond to genuine issues in a constructive way.

In the first instance, we encourage you to raise any concerns which you may have through your normal reporting line or HR manager.

If for whatever reason, this may be difficult, not appropriate or the person to whom you have reported the matter has not been able to resolve your concern, you can contact G4S Speak Out by telephone or website to report these matters.

Once the details of the concern have been logged by Speak Out the regional compliance and ethics team will assess and respond to your concern, commissioning any necessary investigation in line with Group standards.

Employees who report concerns are helping us improve how we work and our work environment, uphold our G4S Values and safeguard our reputation. Reporting concerns also helps us to resolve issues early before they develop into a more serious situation.

We will ensure that those who Speak Out are supported and not punished in any way for raising a concern. If you raise a concern you will be taken seriously and respected.

Any harassment or informal pressure placed by managers or colleagues upon employees who have raised concerns or provided information to an investigation will be treated as retaliation and will not be tolerated. If you Speak Out you will always be protected by G4S. G4S views any retaliation against those who Speak Out as a serious disciplinary offence which may result in action up to and including dismissal (in accordance with local laws).

Misuse of the Speak Out website or telephone service by anyone, or knowingly making false allegations, is also unacceptable and will be treated as a serious disciplinary matter.

Subject to regional legislative restrictions, typical concerns that may be raised using Speak Out include (but are not limited to):

- Breaches of law or regulation
- Breaches of company policies or values
- Unsafe working conditions or health and safety risks
- Bribery or corruption
- Bullying, harassment, discrimination or other inappropriate behaviour
- Criminal offences, violence or threats of violence
- Actions resulting in the violation of an individual's human rights

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- Deception of customers or exploitation of customer relationships and/or standards
- Misuse of confidential information
- Fraud or dishonest behaviour
- 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 relevant Regional Ethics Committee and followed up. Where required, an investigator will be appointed to the case who may be internal (but independent of the allegation) or, if appropriate, external to G4S.

Where possible, when raising a concern via Speak Out you will be:

- Thanked, supported and protected
- Advised how your 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 you believe you are suffering negative impact for having raised a concern, that you should report this to the chair of the Group Ethics Steering Committee or the chairman of the Group Audit Committee by emailing [speakout@g4s.com](mailto:speakout@g4s.com)

## Governance and Oversight

The Whistleblowing Policy and general oversight of the reporting and investigation practices are overseen by the Group Ethics Steering Committee. Membership of the Steering Committee consists of: The Group General Counsel (chair), Group Human Resources Director, Group Corporate Affairs Director, Group Company Secretary, Group Head of Risk & Compliance and the Group Chief Financial Officer.

The Group Head of Risk & Compliance has overall responsibility for assessing the effectiveness of G4S's Speak Out arrangements.

Effectiveness of the Speak Out process and our employees confidence in using it, will be measured through a combination of periodic review of the Group's Speak Out arrangements, the biennial Employee Engagement Survey [link] and the year-on-year analysis of the cases reported [link].

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

The Group Ethics Steering Committee, Audit Committee and CSR Committee receive regular updates on Speak Out trends, caseloads and investigations into allegations of a serious nature.

Information about the effectiveness of G4S's Speak Out arrangements is reported publicly, each year, within our Integrated Annual Report.

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