



# Supplier Code of Conduct

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## INTRODUCTION

G4S pursues a responsible purchasing policy consistent with its business ethics, respect for fundamental worker rights, and environmental standards, all of which are key conditions for doing business with G4S.

This Supplier Code of Conduct sets out the G4S requirements and expectations with respect to key areas of responsible sourcing, and ensures that G4S upholds the values and sustained excellence for its customers and stakeholders.

This G4S Supplier Code of Conduct is informed by the International Bill of Human Rights and the UN Guiding Principles on Business & Human Rights, the principles concerning fundamental rights set out in the International Labour Organization's (ILO) Declaration on Fundamental Principles, Rights at Work and the 2015 Modern Slavery Act.

This Supplier Code of Conduct applies to all G4S Suppliers and their sub-contractors, which mean all of those with whom G4S and its subsidiaries worldwide have a contractual relationship; including contractors, Suppliers of goods and services and joint venture partners.

Any breach of the obligations stipulated in this Supplier Code of Conduct will be considered a material breach of contract by the Supplier.

## EXPECTATIONS FOR SUPPLIERS

As a minimum, all our Suppliers must comply with this Supplier Code of Conduct as defined by G4S. They are expected to ensure that these obligations are already in place or there is a clear time-line for full implementation within their own organisation and their associated Suppliers and sub-contractors.

G4S is committed to the highest standards of business integrity and as a result will not tolerate any practice that is inconsistent with the principles of honesty, integrity and fairness, anywhere in the world it operates.

G4S reserves the right to audit any of its Suppliers and their sub-contractors to confirm that the requirements set out in this Code of Conduct are in force. Failure to permit such an audit may result in the termination of any supply contract with G4S and its subsidiaries.

Should any audit identify any levels of non-compliance to this Code of Conduct, the supplier will be required to provide a detailed remedial action plan within twenty eight days, which must be presented to the relevant G4S Procurement team. If the Supplier refuses to comply with the action plan, G4S reserves the right to terminate the commercial relationship.

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Where compliance with this Supplier Code of Conduct could lead to a conflict with or a violation of applicable laws or regulations, the Supplier shall promptly notify G4S of the situation and explain how it intends to operate in a responsible manner.

## THE SUPPLIER DECLARES TO COMPLY FULLY WITH THE FOLLOWING:

### BUSINESS ETHICS

All commercial exchanges with our Suppliers are based on an honest basis across all aspects of their operations both internally and externally. All transactions will comply with applicable laws and be built on transparency, strict business practices, confidentiality and freedom of competition.

The Supplier and its sub-contractors will have in place the appropriate business ethics policies and procedures, which must be in the appropriate local language(s) and distributed to employees, Suppliers and agents. Suppliers must be committed to the highest standards of ethical conduct when dealing with workers, Suppliers and customers.

### ENVIRONMENTAL POLICIES

All our Suppliers are required to apply all local applicable laws related to environmental issues. We strongly encourage our Suppliers to develop a sustainable environmental policy, which aims at reducing waste and minimising the environmental impact of their operations. The Supplier will provide G4S with details of their environmental policy.

The Supplier agrees to:

- Act in accordance with the applicable statutory and international standards regarding environmental protection.
- Minimise environmental pollution and make continuous improvements in environmental protection.
- To set up or use a reasonable environmental management system and demonstrate a commitment to reducing their environmental impact.
- When requested provide details of their carbon emissions to G4S as part of a Scope 3 GHG measurement requirement.
- Not source any timber protected by international agreements such as the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) or if its composition or origin are not known.

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- Procure all timber in accordance with the applicable local legislation and wherever practicable from responsible sources. For supply into the European Union all timber products must be sustainable and FSC or (PEFC) certified.
- Ensure that any food procured on behalf of G4S complies with all legislation related to quality, sustainability and the environment.
- Only use Suppliers who provide provenance of their main ingredients back to the primary source for food procured on behalf of G4S.
- Suppliers employing more than 250 people must ensure they have a carbon reduction strategy in place and where possible follow the World Business Council for Sustainable Development (WBCSD) and World Resources Institute (WRI) Greenhouse Gas Protocol or have a comparable standard for vehicle fleet, fuel, refrigerants and electricity usage.

## SUPPLYING GOODS AND SERVICES TO THE UNITED KINGDOM GOVERNMENT

Any Supplier or sub-contractor supplying goods or services to Her Majesty's Government in the United Kingdom on behalf of G4S must adhere to the UK Government Commercial Function Supplier Code of Conduct (*September 2017*)

Please see the link below to access this code of conduct

<https://www.gov.uk/government/publications/supplier-code-of-conduct>

## PROHIBITION OF CORRUPTION AND BRIBERY

G4S conducts its business in accordance with all applicable laws and regulations and sets high standards of ethical behaviour. Suppliers are expected to:

- Comply with international anti-bribery standards as stated in the United Nations Global Compact Principle 10 and local anti-corruption and bribery laws including, The UK Bribery Act 2010 and USA Foreign Corrupt Practices Act (FCPA).
- Not offer services, gifts or benefits to G4S employees in order to influence the employee's conduct in representing G4S in any jurisdiction.
- Maintain adequate procedures to prevent employees and others performing services on their behalf from paying and receiving bribes.

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## RESPECT FOR BASIC HUMAN RIGHTS

G4S Suppliers must act in line with local legislation, the principles of the United Nations Global Compact, the UN Guiding Principles on Business & Human Rights, the UN Universal Declaration of Human Rights, the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

The Supplier agrees to:

- Promote equal opportunities for, and treatment of its employees irrespective of race, nationality, social background, disabilities, sexual orientation, pregnancy or maternity, political or religious conviction, sex, age; marital or civil partnership status or any other factor which cannot be justified.
- Not employ or make anyone work against their will or under circumstances in which their labour may be coerced and exploited.
- Respect the personal dignity, privacy and rights of each individual.
- Refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination.
- Prohibit behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.
- Provide fair remuneration and guarantee the applicable national statutory minimum wage, union agreements or industry standards.
- Recognise, as far as legally possible, the right of free association of employees and to neither favour nor discriminate against members of employee organisations or trade unions.
- Employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14. In the case of jobs with a higher degree of risk, such as front line security roles, no workers under the age of 18 should be employed.
- Where the Supplier is engaged in the recruitment and supply of migrant works to G4S, comply with the regulations and laws in force in host and destination countries as well as with the G4S Migrant Workers Policy and associated Appendices which apply, which applies additional measures covering the use of recruitment agencies, accommodation standards and employment terms and conditions.

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Where relevant, Suppliers and sub-contractors who provide manned security and other related services agree to:

- Respect the rule of law, including safeguarding human rights.
- Ensure that employees are appropriately trained, including firearms handling where applicable.
- Ensure that individuals credibly implicated in human rights abuses do not provide services to G4S.
- Ensure that appropriate rules for the use of force are in place, and that the use of physical force is for defensive purposes only.
- Report any instances of physical force used by the Supplier or their sub-contractors to the relevant authorities and G4S.

## HEALTH AND SAFETY OF EMPLOYEES

G4S expects our Suppliers to strive to implement the standards of occupational health and safety at a high level. The Supplier must comply with occupational health and safety regulations and provides a work environment that is safe and conducive to good health, in order to preserve the health of employees and prevent accidents, injuries and work related illnesses.

The Supplier agrees to;

- Take responsibility for the health and safety of its employees.
- Control hazards and take the best precautionary measures against accidents and occupational diseases.
- Provide documented training and ensure that employees are educated in health and safety issues.
- Set up or use an occupational health and safety management system.
- Comply with all relevant local laws and regulations.

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## SUPPLY CHAIN DIVERSITY

To deliver an effective and sustainable supply chain, G4S seeks to engage diverse and inclusive Suppliers within the local communities where we operate.

G4S expects its Suppliers to demonstrate a diverse workforce composition actively embracing workforce age, gender, race, national or ethnic origin, religion, language, political beliefs, sexual orientation, physical ability and promoting supply chain inclusion throughout their own supply chains.

The Supplier agrees to:

- Use reasonable efforts to promote among its Suppliers compliance with this Code of Conduct.
- Provide G4S with details of their diversity and inclusion policy and where requested provide evidence of how this policy is put into practice.
- Be committed to ensuring its own Supplier selection processes are transparent, objective and non-discriminatory and provide fair and equal opportunities for all organisations including Small and Medium Enterprises (SMEs) and organisations owned by under-represented groups.
- Confirm the ability to report periodically to G4S on workforce demographics and other diversity related issues as required.
- Give robust consideration to the economic, environmental and social consequences of its choice of design, materials, manufacture, production, logistics, service delivery, operation, maintenance, recycling and disposal and to how best to address these consequences.

## SCREENING OF EMPLOYEES

Suppliers must undertake employee employment screening in line with the relevant G4S standards or industry standards if more onerous for all employees who provide services behalf of G4S.

## BUSINESS CONTINUITY PLANNING

The Supplier shall be prepared for any disruptions of its business (e.g. natural disasters, terrorism, software viruses). This preparedness especially includes disaster recovery plans to protect both employees and the environment as far as reasonably possible from the effects of possible disasters that arise within the domain of operations.

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## RECORD ACCURACY AND RETENTION

The Supplier shall ensure that business records relating to G4S are securely retained for the period required by law, and that they accurately and fairly reflect all business transactions.

## DATA PROTECTION

The Supplier shall ensure compliance with laws and directives providing for the protection, transfer, access and storage of personal information. This includes General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679)

## GOVERNMENT, MEDIA AND INVESTOR RELATIONS

The Supplier shall not instigate any form of publicity or make any statement or submission to investors, the media or government referring to G4S, without first obtaining prior written permission from the G4S (except where required by Government or under the law). The Supplier must submit any such request to G4S Group Communication Department ([media@g4s.com](mailto:media@g4s.com)) for authorisation.

## REPORTING BREACHES OF THE CODE

All Suppliers are expected to self-monitor their compliance with this Supplier Code of Conduct. In the first instance, known or potential breaches should be reported to the: G4S Procurement Best Practice Lead: [victoria.deputron@g4s.com](mailto:victoria.deputron@g4s.com) or via the **Speak Out website** at [www.g4s-speakout.com](http://www.g4s-speakout.com)

## MANAGEMENT COMMITMENT

The Supplier's board must commit to adopting or establishing a management system designed to ensure compliance with this Supplier Code of Conduct and applicable laws and regulations, identify and mitigate related operational risks, and facilitate continuous improvement.

<b>Issued by:</b>	Robert Copeland; Procurement Director	
<b>Endorsed by:</b>		
<b>Date</b>	<b>Signature</b>	
27/11/2017		Tim Weller, Chief Financial Officer (G4S PLC)
23/11/2017		Robert Copeland, Procurement Director
23/11/17		Nigel Lockwood, Head of CSR (G4S PLC)

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