



Business Ethics Policy

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Preface and document control

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

Owner	Group HR
Approver(s)	Group HR Director

Version control

Version	Version date	Document history
1.0	12/05/2011	1 st Formatted live document
1.01	12/08/2011	Live document including amends relating to Bribery Act legislation
2.0	01/05/2012	Live document. Annual review and updates to reflect new policies.
	Enter a date.	

Internal distribution list

Top 350 managers and all employees	

External distribution

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The G4S Ethics Code

The business philosophy of G4S has been developed around a core set of values which are fundamental to the organisation’s development and success. One of these values is **Integrity**, which means we can always be trusted to do the right thing, and the G4S Ethics Code below sets out how we expect all our employees to behave in order to live this core value.

<p>Being safe and secure</p> <ul style="list-style-type: none"> • Putting health & safety first • Protecting the security of our customers, the public and those in our care • Carefully following company rules and procedures 	<p>Being honest and trustworthy</p> <ul style="list-style-type: none"> • Always following the law • Reporting any wrongdoing • Never offering or taking a bribe • Avoiding any conflict of interest 	<p>Being fair and considerate</p> <ul style="list-style-type: none"> • Showing respect and consideration for others • Treating people fairly • Considering our local communities • Thinking about the environment 	<p>Being professional and proud</p> <ul style="list-style-type: none"> • Doing the best job you can • Looking smart and professional • Being a good role model • Safeguarding the G4S name
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All G4S companies are required to ensure the G4S Ethics Code is cascaded throughout their business and brought to the attention of all employees.

The Business Ethics Policy

In support of this code, the purpose of this Business Ethics Policy is to ensure that managers and employees have a detailed understanding of the group’s minimum standards of operation and the expectations of our customers and stakeholders.

It is essential that the ethical business standards set out in this policy are applied throughout our countries of operation. Our senior managers are therefore asked to show their personal commitment by regularly endorsing this policy and confirming compliance within their own areas of responsibility. All G4S companies are also required to ensure this policy is cascaded to all managers as well as to other employees whose roles are impacted by these standards.

We are committed to these standards and routinely monitor compliance across the organisation, taking necessary action in the unlikely event that they are not being met.

Nick Buckles
CEO
G4S plc

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1. Our approach to being a good corporate citizen

G4S is committed to being a good corporate citizen, taking account of the economic, social and environmental impact of our business and aiming to maximise the benefits and minimise any negative impact of our global operations.

1.1. Human rights

G4S is committed to delivering high standards of human rights around the world. To do this, we aim to apply the new United Nations Guiding Principles on Business and Human Rights (2011) - based on the International Bill of Human Rights and the ILO Declaration of Fundamental Principles & Rights at Work (1998) - across the group. A new Policy and detailed Guidelines will be launched during 2012 to provide clarity on upholding these principles in our policies, procedures and practices throughout our operations.

The new policy demonstrates our commitment to respect human rights and embodies our particular understanding of their significance for a global security company of our scale and diversity. The Human Rights Guidelines will set out our expectations for the conduct of all companies in the group, our employees and those with whom we do business.

G4S is also a signatory to the UN Global Compact and a founder signatory of a new International Code of Conduct for Private Security Providers which sets out principles for security operations in so-called “complex environments” – areas experiencing or recovering from disaster or unrest and where governments or the rule of law are weak.

We will endeavour to work with business partners who conduct their business in a way that is compatible with our policies of respect for human rights and ethical conduct. We will work with customers to ensure that contractual requirements do not infringe human rights. We will take measures to ensure that the work of our employees does not compromise internationally accepted human rights conventions, whilst recognising and respecting the diversity in local cultures across the different countries in which we operate.

1.2. The environment

G4S will conduct our business with respect and consideration for the environment. We will strive actively to reduce the group’s overall impact on the environment by targeting annual reductions in our carbon intensity and the management of waste, water, vehicle emissions and energy consumption.

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1.3. Local communities

G4S is fully committed to supporting and assisting the communities in which we operate through a variety of means including charitable fund-raising, sponsorship of community projects and voluntary work by employees. We conduct our business with respect and consideration for the good of local communities, taking steps to minimise any disturbance as a result of our operations. We will also serve local interests by providing good employment opportunities and effective services and products.

2. Standards of business practice

G4S is committed to high ethical standards in our business dealings to ensure the integrity of our employees and our organisation is maintained.

2.1. Bribery and corruption

G4S is resolutely opposed to bribery and corruption in whatever form it may take.

Any payments, gifts or inducements made by or on behalf of G4S and which induce or are intended to induce someone to act improperly and payments, gifts or inducements to public officials to influence them in the performance of their duty (other than payments, fees etc which they are entitled to demand by written law) are matters which are likely to result in disciplinary action, including summary dismissal, against employees concerned.

Gifts or entertainment may only be offered to a third party if they are consistent with customary business practice in the relevant territory, are modest in value and cannot be interpreted as inducements to trade. Where there is any doubt, guidance should be sought from the Entertainment Policy and the relevant Regional or Group General Counsel.

Sales of the Company's services and products and purchases of products and services from suppliers will be made solely on the basis of quality, performance, price, value and/or for the benefit of the Group, and never on the basis of giving or receiving inducements in the form of payments, gifts, entertainment or favours or in any other form. The Commercial Sponsorship Policy provides additional guidance to managers on this subject.

Employees should not accept gifts, money or entertainment from third party organisations or individuals where these might reasonably be considered likely to influence business transactions. Gifts, other than trivial ones with a low value, should be returned. In a culture where such an action might cause offence, the gift should be declared to the company and, if practical, donated to an appropriate charity.

2.2. Political contributions

G4S does not make contributions to political parties, political candidates or organisations which are politically active and this policy should be followed worldwide. The only exceptions to this might be in countries where there is a legal requirement to do so or where there is an

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established, lawful and generally accepted practice to do so. Even in such circumstances, any payment must be approved in advance by the full G4S plc board.

All G4S group companies are bound by the rules which govern G4S plc. This means that approval from the shareholders of G4S plc at a General Meeting would be required for any significant payment. Since obtaining such approval would be difficult, time consuming and expensive, payments of any more than token amounts are unlikely to be permitted. In accordance with the G4S Policy on Political Contributions, any request for approval should be submitted in the first instance to the relevant Regional or Divisional CEO who must refer the request to the G4S Company Secretary before any payment is offered or made.

2.3. Treatment of customers

Mutual trust and confidence between G4S and our customers is vital. All employees should strive to consistently deliver service excellence and value for money, meeting customers' expectations and anticipating their changing requirements.

2.4. Internal suppliers

Any business transactions between G4S subsidiaries for the supply of goods or services should be based on normal 'arm's length' business principles. These principles should cover pricing and other contractual terms and must be as defensible as those to which independent parties might be expected to agree.

2.5. External suppliers

All suppliers are entitled to fair treatment and all potential suppliers should have a reasonable opportunity to win G4S business. It is our policy to pay suppliers on time in accordance with agreed terms of trade. We set high standards for our suppliers in the context of our own ethical policy.

2.6. Competition

G4S will always compete vigorously, but in a fair and ethical way. Competitive success is built on providing good value and service excellence. Competitors should not be disparaged. When in contact with competitors, employees will avoid discussing confidential information and no attempt will be made to improperly acquire competitors' trade secrets or any other confidential information. Employees must not publicise, discuss or share with competitors (even indirectly) pricing strategies or undertake any arrangements or practices which would conflict with the laws applicable to the business concerned.

3. Our approach to corporate governance

G4S is committed to protecting the interests of our shareholders and our organisation through compliance with the relevant legal and regulatory environments and careful management of business risks.

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3.1. Compliance with the law

G4S will comply fully with all relevant national and international laws and will act in accordance with local guidelines and regulations, including those which are industry specific, governing our operations.

It is the responsibility of all managers to ensure, by taking legal or other expert advice where appropriate, that they are aware of all local laws and regulations which may affect the area of the business in which they are engaged, including tax and exchange controls.

3.2. Accounting standards and records

All accounting documentation must clearly identify the true nature of business transactions, assets and liabilities in conformity with relevant regulatory, accounting and legal requirements. No record or entry may be false, distorted, incomplete or suppressed.

All Group reporting must be accurate and complete and in compliance in all material respects with accounting policies and procedures, as outlined in the Group Finance Manual. Employees must not materially mis-state or knowingly misrepresent management information for personal gain or for any other reason.

3.3. External reporting

G4S businesses may be required to make statements or provide reports to regulatory bodies, government agencies or other government departments. Care should be taken to ensure that such statements or reports are correct, timely and not misleading. Senior management must be made aware of any sensitive disclosure before it is made.

Care must also be taken when making statements to the media that information given is correct and not misleading. Information which, if made public would be likely to have material effect on the G4S plc share price or about transactions such as mergers, acquisitions or disposals (no matter how small) is subject to specific rules. Such matters should be referred to the relevant Regional or Divisional General Counsel. Enquiries from the media should be referred to company media relations experts and statements should only be made by designated spokespersons.

G4S will provide, through the G4S corporate web-site and through the published annual report and accounts and other statements, appropriate information to enable shareholders to assess our business performance. We will comply with applicable laws and stock exchange regulations as to the disclosure of information about G4S.

3.4. Policies and procedures

G4S recognises that there are risks associated with carrying out any business activity. Management is responsible both for ensuring that policies and procedures are in place to manage risks and for complying with those policies and procedures. Employees should

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ensure that they are aware of the risks associated with their activities and that they comply with policies and procedures in place to manage those risks.

4. Our commitments to our employees

G4S is committed to optimising individual and business performance through employing the best people at all levels and creating an environment in which they want to and are able to contribute fully to the Group's success. To achieve a working environment in which team spirit and commitment to the goals and values of G4S are maintained, the Company will ensure that individual employees are treated fairly and with dignity and respect.

4.1. National regulation

In dealing with its employees, G4S will act in compliance with national regulatory requirements and employers' obligations to employees under labour or social security laws and regulations must be respected.

4.2. ILO Declaration on Fundamental Principles and Rights at Work

G4S supports the four fundamental principles in the ILO Declaration. Thus, in accordance with local legislation and practice we will respect freedom of association and the right to collective bargaining, employment will be freely chosen with no use of forced or child labour, and we will not discriminate on the basis of gender, colour, ethnicity, culture, religion, sexual orientation or disability.

4.3. Harassment

Harassment can be defined as unwanted behaviour, which a person finds intimidating, upsetting, embarrassing, humiliating or offensive. Conduct involving the harassment (racial, sexual or of any other kind) of any employee is unacceptable. Should an employee believe that he or she has been harassed the matter should be raised with the relevant Human Resources Manager who will arrange for it to be investigated without delay, impartially and confidentially.

4.4. Equal opportunity

G4S values all of its employees for their contribution to the business. Opportunities for advancement will be equal and will not be influenced by considerations other than their performance, ability and aptitude. Employees will also be provided with the opportunity to develop their potential and, if appropriate, to develop their careers further with the company.

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4.5. Health & safety

G4S places the highest priority on promoting the health and safety of employees whilst at work. In particular, we will constantly review the effectiveness of our methods of operation to best protect those who work in a high-risk environment.

4.6. Terms of employment

The businesses and their employees will work towards creating permanent long-term relationships. Employees will be paid for and work hours at least as favourable as the terms established by national legislation or agreements or industry standards.

4.7. Pre-employment screening and selection

In order to protect the interests of its employees and customers, and because of the nature of its business, G4S will apply rigorous pre-employment screening and selection techniques.

5. Employee commitments to G4S

Employees must avoid situations where appearance of business impropriety exists, even though the circumstances might not otherwise specifically violate this code of conduct or where specific laws or regulations do not apply.

5.1. Confidential information

Employees must not make use of confidential information obtained through their employment for personal gain. The disclosure of confidential information to any third party during or after employment is not permitted unless the disclosure has been appropriately authorised, is for a legitimate business reason and the information is being securely communicated. 'Confidential information' is either information that has been specifically described as being confidential or is otherwise obviously confidential from the surrounding circumstances.

The term 'confidential information' does not include information in the public domain or information which the individual concerned is required by law to disclose.

5.2. Conflicts of interest

Every employee has a duty to avoid business, financial or other direct or indirect interests or relationships which conflict with the interests of the Company, or which divides his or her loyalty to the Company. Any activity which even appears to present such a conflict must be avoided or terminated unless, after disclosure to the appropriate level of management, it is determined that the activity is not unethical or improper, does not compromise integrity and is not detrimental to the reputation and standing of the company.

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5.3. Social networking

Employees who engage in social networking on websites or in groups which show any association with, or make reference to, G4S are expected to behave in ways that are consistent with G4S values and policies. Employees must therefore ensure that the company is not exposed to legal or reputational risks and the safety and security of employees, customers and the general public are not undermined.

6. Implementation

This Business Ethics Policy is widely published in G4S including on the global intranet and corporate website. The Policy must be adopted by all companies as a minimum standard and issued to all G4S managers and relevant specialists. Ethics training will be provided and an annual sign off implemented.

For frontline/administration staff an Ethics Code (including relevant elements of the Business Ethics Policy) is to be promoted by business units and management with content reflected where appropriate in training, and other internal communications channels.

For all new staff, employment contracts or written statements include the Business Ethics Policy or Ethics Code as appropriate. These should be signed, retained on file and be auditable.

Implementation and adherence to the Business Ethics Policy is monitored as part of G4S compliance processes. The policy will be reviewed annually. Where G4S companies already have their own published ethics policies, these must be reviewed against this Group policy to ensure they meet the same minimum standards.

6.1. Staff complaints, concerns and suggestions

Staff can expect that the Company will give due consideration to their constructive suggestions and will provide a considered and objective review of genuine concerns and complaints. Such concerns include fraud, misrepresentation, theft, harassment, discrimination and non-compliance with regulations, legislation, policies and procedures.

Concerns must be investigated impartially so that the employee's rights are protected. Employees who have concerns about potential unethical behaviour should advise their local Human Resources or Finance Director in the first instance. Employees may do this anonymously if they so wish. To ensure that confidentiality is maintained, employees should not discuss such concerns with colleagues or other third parties, unless specifically authorised or unless it is a legal requirement.

If the employee is dissatisfied with the response to the concern which he or she has raised, or if the concern relates to a matter of exceptional gravity or sensitivity, he or she can use a confidential reporting hotline. There are two levels of hotline available:

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- G4S local business hotline for employees to raise concerns for reporting, investigating and resolution by senior management in their own local business. All G4S businesses are required to advise their employees of the phone number and email address to be used.
- Safe to Say – A global hotline and web service (<https://www.g4s.safe2say.info/>) for issues which either cannot be reported and properly investigated locally, or are of exceptional gravity or sensitivity. G4S businesses are required to make their employees aware of the relevant free phone number and calling instructions for their country of operation.

6.2 Compliance monitoring

We monitor, on a regular basis, compliance with this ethics policy, using information reported via the confidential reporting hotline facility, internal/external audit and ongoing management reporting.

6.3 Adherence to policy

Since G4S aims to maintain high ethical standards in carrying out its business activities, practices of any sort that are incompatible with the Group's principles and policies are not tolerated. Strict adherence to these principles and supporting policies is a condition of employment in the Group. Any action by an employee, which deliberately or recklessly breaches this ethics policy, may result in disciplinary action and where appropriate, criminal proceedings will be instituted.

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