



G4S UK & Ireland political lobbying policy

As one of the world's largest companies, G4S has a responsibility to ensure that our commitment to the highest ethical and regulatory standards is clear. Integrity is one of the Group's core values - being a responsible business partner, employer, customer and supplier is an important part of our strategy and forms an essential foundation on which we carry out our business.

This policy refers to the approach G4S Secure Solutions (UK & Ireland) ('G4S') takes to our official and unofficial interactions with the local and national governments or governmental organisations (generally referred to as "governments" in this policy) of the countries in which we operate on matters of current or future public policy which have specific interest to the business and/or its stakeholders.

This policy applies to all G4S companies incorporated into the UK & Ireland region, including Afghanistan, Iraq and Sudan.

Definition of lobbying

We deliver public services in partnership with and on behalf of the UK and other sovereign Governments and in the course of doing this our employees will have frequent discussions with stakeholders about service delivery and possible new services or new ways of delivering services. All such interactions will be undertaken in an ethical way and on the basis of the best information and analysis available.

For the purpose of this policy, G4S defines lobbying as instances where:

- An Authorised Person (see below) expresses opinion over a matter of current or future public policy to politicians or officials working within government departments or international supra-governmental organisations on behalf of G4S;
- An Authorised Person provides feedback or any other form of input to government elected politicians or officials working within government departments or international supra-governmental organisations on a matter of current or future public policy on behalf of G4S

Stakeholders

G4S considers the stakeholders which might be affected by our lobbying approach to be:

- international, national and local politicians;
- international, national and local officials;
- regulatory and inspection bodies;
- industry trade bodies;
- partners;
- G4S plc shareholders and the investment community at large;
- employees and potential future employees of G4S worldwide.



G4S approach to lobbying

G4S aims to be consistent in our communications with local and national governments or international supra-governmental organisations on matters of current or future public policy, as well as transparent in our reporting of these communications to stakeholders.

We take our role as a responsible corporate citizen and an industry leader seriously, and as such we do engage on current or future public policy matters which are of specific concern to us or to our stakeholders.

However, we are a politically-neutral company and will not engage in any lobbying intended to favour or promote a specific political party or organisation.

Political contributions

As outlined in the G4S plc Business Ethics Policy, G4S does not make contributions to political parties and this policy is followed worldwide. The only exceptions to this are in countries where there is a legal requirement to do so or where there is an established, lawful and generally accepted practice to do so. In such circumstances, any payment must be approved by the Regional CEO.

As G4S is a UK plc, it must comply with the UK Companies Act. As a result any intended payments by any group company to organisations which are politically active anywhere within the European Union must be referred to the G4S company secretary, before they are offered or made. Shareholder approval may be required and obtaining such approval would be difficult, time consuming and expensive, so payments of any more than token amounts are unlikely to be permitted.

Responsibility for public policy activities

The Regional CEO for G4S UK, Ireland and Africa is responsible for the overall position of the region on public policy matters in the countries in which we operate. The CEO may delegate that authority to relevant country or business unit Managing Directors in their areas of responsibility.

The responsibility for monitoring and overseeing public policy interaction is held by the UK& Ireland Regional Corporate Affairs Director who ensures that lobbying activity is consistent with the Group's position, is legally compliant, follows best practice and is properly reported to stakeholders.

Authorised Persons

Lobbying on behalf of G4S in the UK & Ireland may only be carried out by individuals who have been expressly authorised to do so by the Regional CEO or UK & Ireland Regional Corporate Affairs Director. These individuals (Authorised Persons) will carry out public policy interactions only on the basis of the best information and analysis that is available.



These Authorised Persons will only carry out lobbying on behalf of the Company on the subject areas for which they have been expressly authorised, and they are responsible for reporting to the Regional Corporate Affairs Director on the progress and outcomes of their activity.

The lobbying process

Lobbying will be carried out only by Authorised Persons, as outlined above. It will be undertaken in a manner that is lawful and appropriate to the country in which it is taking place. All interaction with representatives of governments will be consistent with the Group's Business Ethics Policy.

We will ensure that any lobbying that takes place through the various Trade Associations of which we are a member is a true reflection of our values.

Disclosure

In order to ensure transparency for our shareholders and other stakeholders, G4S will maintain on its website its responses to UK Government consultations.