



G4S Slavery and Human Trafficking Statement (2022)

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015, for the year ended 31st December 2022. It sets out the steps that we have taken to identify and reduce the risk of modern slavery occurring within our supply chain and business operations.

Commitment and approach

We have a continuing commitment to respect human rights. We seek to use our influence and geographical reach to help improve industry standards, provide decent employment opportunities and promote stable communities around the world.

Everyone at G4S is expected to respect and protect the human rights of the company's employees, the people in our care, those that supply G4S, and those that live and work in the communities in which we operate.

There are no circumstances under which any human rights abuses are acceptable or will be tolerated.

We recognise that identifying modern slavery and human trafficking risks or practices can be challenging, and understand that no global organisation can be complacent nor have complete certainty that it is not present within its organisation or supply chain.

We have taken action and made positive progress to our systems and controls, but remain dedicated to continual improvement to mitigate the risk of modern slavery and other human rights violations occurring in any of our business operations or supply chains.

At G4S, we utilise a range of information sources to help us identify potential modern slavery risk areas. These include engagement with NGOs and other independent experts such as EcoVadis, UNI the global union, the International Labour Organisation (ILO), and the United Nations Global Compact's Modern Slavery Working Group. As a result, we continue to focus our efforts on mitigating these risks in both our international supply chain and the employment of migrant workers in the Middle East and Asia.

Organisation

G4S has a unique global footprint, with operations across almost 100 countries, and is trusted to manage complex security matters for customers across a broad range of government and commercial industry sectors.



We believe that there is no greater purpose than serving and helping safeguard customers, communities, and people around the world.

- Delivering industry-leading security solutions to our customers
- Providing rewarding work for our employees
- Making a positive social and economic contribution to our society
- Building a company that creates significant and sustainable value for our key stakeholders

In April 2021, Allied Universal, a leading security and facility services company, established in the United States, acquired G4S. Since that date, the organisation has been working to harmonise the policies and procedures of both companies - sharing experience and adopting the best from both. Given the size and scale of our operations, the integration process is complex and has continued throughout 2022.

With its headquarters in the UK, G4S Ltd manages the Allied Universal (International) businesses outside of North America, which chiefly use the G4S brand.

Further information about Allied Universal and G4S can be found on our websites at aus.com and g4s.com

Managing modern slavery risks in the supply chain

We strictly prohibit the use of modern slavery in G4S's supply chain and are committed, together with our suppliers, to operate in an ethical way, respecting international human rights standards, including the prohibition of forced or coerced labour.

There are currently around 40,000 suppliers supporting G4S's worldwide operations, delivering a broad range of goods and services. Our risk assessment process has identified a small number of key categories of procurement spend as having a potentially higher risk of exposure to modern slavery.

- a) Manufacture of electronic equipment and of textiles, such as uniform
- b) Non-technical facilities management, such as cleaning, catering and support services.
- c) Temporary labour

Refreshed early in 2023, our [Supplier Code of Conduct](#) sets out G4S's requirements and expectations with respect to key areas of responsible procurement, including the prevention of modern slavery and human rights violations.

As a minimum, all suppliers to G4S are expected to comply with the principles set out in the Supplier Code of Conduct or to commit to a clear timeline for full implementation within their own organisation, and their associated suppliers and subcontractors.



We have partnered with leading sustainability analytics experts, [EcoVadis](#) and [Integrity Next](#), to help ensure that our suppliers meet the ethical standards set out in our Supplier Code of Conduct.

The G4S and EcoVadis programme applies to suppliers in high-risk categories. It requires in-scope suppliers to complete an assessment tailored to their industry, size, and location. The assessment covers 21 criteria across the four sustainability themes:

- I. *Labour and Human Rights:* This criteria covers issues such as child labour, forced labour, discrimination, and health and safety
- II. *Ethics:* Covering issues such as bribery and anti-corruption practices
- III. *Environment:* Covering issues such as climate change, pollution, and waste management
- IV. *Sustainable Procurement:* This criteria covers issues such as ethical sourcing, fair trade, and recycled materials.

The supplier's responses are analysed by EcoVadis, which provides both the supplier and G4S with a detailed report setting out the supplier's sustainability performance. Where their performance does not meet the required levels, a corrective action plan must be submitted to G4S to address any issues raised.

Since its launch, the programme has been implemented in G4S businesses across 26 countries. Within these markets around 5.5% of suppliers (c.560) have been categorised as potentially high-risk, including manufacturers of electronics and uniforms, providers of cleaning services and temporary labour.

To date, approximately 400 EcoVadis assessments have been completed, representing over 70% of in-scope suppliers. We are encouraged that, as we extend the programme into more challenging, developing markets, more than half continue to achieve a satisfactory rating.

We work with those that have not achieved a satisfactory rating, or who declined to take part in the programme, to address any shortfalls or encourage participation. A small number have failed to fully engage with the programme and have been excluded from our supplier database as a result.

Alongside our partnership with EcoVadis, in 2021, we began implementation of Integrity Next into our supply chain management. Integrity Next is an online supplier monitoring platform that assesses a broad range of ethical and sustainability matters, providing G4S with a real-time overview of our suppliers sustainability performance. To date, the system has been applied in six countries, representing around 45% of G4S spend.

We will continue to utilise the experience gained from Ecovadis and Integrity Next and expand these programmes internationally. By the end of 2024, we aim to have extended the Integrity Next system across businesses representing 80% of G4S's procurement spend. Additionally, building on the experience of G4S, Allied Universal aims to launch a Supplier Code of Conduct and supplier ethics due-diligence programme across its North American operations later this year.



In addition, to support the programme, we have:

- Published a '**G4S Supply Chain Social Principles**' guidance and due-diligence toolkit, to help G4S procurement teams provide clarity to suppliers on the social standards expected of them.
- Delivered **modern slavery training and guidance** to G4S procurement teams and in-scope suppliers in partnership with EcoVadis.
- Issued **communications** to colleagues, raising awareness of modern slavery and our responsibility, both in the community and in our supply chain.

We reserve the right to audit any of our suppliers and their subcontractors as part of any new contract of supply to confirm that the requirements set out in the Supplier Code are in force. Failure to participate in an EcoVadis assessment or to allow an audit may result in the termination of the related supply contract. If an audit identifies levels of non-compliance with the Supplier Code, the supplier will be required to provide a detailed remedial action plan including timeline to compliance, in order to continue doing business with G4S.

Our business operations and our other policies

Migrant worker welfare and employment practices

G4S is a leading global employer that is committed to the highest standards of employment. This includes ensuring that migrant workers are treated fairly and with dignity and respect.

We ensure that our employment policies and practices are consistent with international conventions, including the UN Guiding Principles on Business and Human Rights and the ILO core labour conventions.

For G4S, the employment of migrant labour is necessary in a small number of countries^{1,2}, where we directly employ around 16,000 migrant workers as the availability of local labour is scarce. We know that migrant workers are far from home and potentially vulnerable, and it is critical that we safeguard their welfare and human rights.

Our Migrant Worker Policy framework is based upon good practice principles and applies additional measures covering the use of recruitment agencies, accommodation standards, and clear employment terms and conditions to help protect employees who are working away from their home country and the legal framework they are familiar with.

G4S is committed to ensuring the human rights of migrant workers (in the same manner as all its employees) are respected. Employment must be freely chosen with no use of force, compulsory, bonded, indentured, or child labour. We aim to offer decent work under terms which protect the health and safety of employees and ensure they are treated fairly, and with dignity.

¹ 2022: Bahrain, Oman, Saudi Arabia, United Arab Emirates

² The G4S branded business in Qatar is not owned by the group. It is owned by the Al-Attiya Group of Trading Companies (AGTC), which operates under a contract that entitles AGTC to use the G4S brand in Qatar.



G4S businesses are required to self-assess against our employment standards and human rights controls on an annual basis and report on action to address any gaps.

These are monitored by the Human Resources Department and Head of Government Affairs & ESG. The feedback from self-assessment is consolidated to show year on year trends and highlight approaches where more guidance or support may be required.

The self-assessments are supported by compliance reviews by local and regional teams and independently reviewed, on a sample basis, by the internal audit department. During 2023 the internal audit department undertook five thematic audits related to migrant worker welfare standards and four broader audits of human rights controls.

In 2020, we adopted the [Employer Pays Principle](#), as set out in the Principles of the Leadership Group for Responsible Recruitment (LGRR). As of 2023, we have completed the implementation of this principle in all directly managed G4S businesses, where migrant employees are deployed.

We continue to encourage and support the owners of G4S Qatar³ to address local challenges and complete implementation of the principle ahead of the LGRR objective date of 2026.

Our 20+ strong team of Migrant Worker Coordinators (MWC), Welfare Officers, and other related roles continue to support migrant workers on the ground. Our MWC are independent of the local management team and reports directly to the Regional Management outside of the country.

- During 2022, our MWC has ensured that migrant worker employees were represented well in our Global Employee Engagement Survey. Over 23,000 migrant workers (including Qatar) participated in the survey, making up 90% of the region's total respondents. Overall, the survey had a 74% response rate in the Middle East and achieved a 91% overall positive score. 84% of respondents indicated that they felt they were treated fairly by G4S and 88% felt that their managers took their concerns seriously.
- Supporting the programme of face-to-face assurance interviews, we are developing a new interactive technology solution, which will be located in all migrant worker accommodation facilities. This portal will enable employees to access information 24/7, complete survey responses, ask questions to regional management, and register any concerns or issues. In addition, Welfare Officers are being trained to conduct interviews with employees and to raise reports with the MWC.
- The programme of face-to-face assurance interviews recommenced in Q1.2023, with over 1,000 (c.21%) migrant workers in the United Arab Emirates being interviewed by end May. The programme aims to cover Oman, Bahrain, and Saudi Arabia by end Q3. 2023.

Additionally, like every employee, our migrant worker community has access to Speak Out, G4S' global whistleblowing service.

During 2022, we have continued to engage with interested stakeholders to ensure that opportunities to accelerate progress are not missed. These stakeholders include local business partners and government representatives.

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Other key policies which relate to the prevention of modern slavery are:

Chaired by the Chief HR Officer (International), the **Modern Slavery Committee** continues to oversee the implementation of our Migrant Worker Policy and standards, and other relevant case reviews.

Our [Ethics Code](#), sets out in detail how the G4S values and standards should be applied in order to always do business in the right way. Supported by mandatory training programmes for all employees, the Code has been designed to be inclusive and accessible to all and relevant at every stage of the employee lifecycle.

The Code, and its accompanying training package, include specific references to human rights matters, including modern slavery and human trafficking.

Our [Global Human Rights Policy](#), which was refreshed in 2022, and its supporting framework apply to all of the Group's businesses, and defines our commitment to the Universal Declaration of Human Rights, the UN Guiding Principles on Business & Human Rights and the ILO's Declaration on the Fundamental Rights at Work. They set our approach to human rights, including the responsibility of management regarding ongoing risk assessment, regular control and thematic audits and compliance monitoring.

We regularly review the global human rights environment to generate a heat-map. The 2023 review identified 26 countries, in which G4S has operations, as being potentially high-risk environments for a range of human rights matters. These may include restrictions on civil liberties, high levels of corruption or the local attitude to labour rights and standards. The reviews findings are integrated into our risk and compliance processes and may trigger additional levels of assessment and internal audit where necessary.

Our [Whistleblowing Policy](#) explains that every G4S colleague has a responsibility to ensure that we uphold our core values, adhere to the law and deliver against the important commitments we set ourselves, including those in our Ethics Code, Human Rights Policy, Supplier Code of Conduct and Human Resources Core Standards.

If colleagues have any concerns that our standards are not being met, we encourage them to use Speak Out (g4s-speakout.com), our global whistleblowing service, to report them.

Speak Out can be used in confidence (where permitted by law), in multiple languages, at any time of the day or night, by any employee, subcontractor, or third-party such as people we work with. Speak Out is promoted to employees and third parties at onboarding, as well as through employee handbooks, Ethics Code, posters, newsletters and other channels. Retaliation is strictly prohibited and any retaliation against those who Speak Out will be treated as a serious disciplinary offence.

Allied Universal's International Ethics Committee oversees the delivery of our whistleblowing policy and conducts regular reviews of serious cases, investigation progress and resulting actions. In 2022, a total of 1,323 cases were raised via Speak Out (2021:1,460). Every report is assessed and investigated further where appropriate.

Recognising the need for regular review and continual improvement, in 2020, we undertook a full review of G4S's whistleblowing service, updating our whistleblowing policy, evaluating the case management process and external service provider and refreshing communications materials. This process will again be reviewed and updated in 2023.

Signature: 

This statement was approved by the board of G4S Limited on 30th June 2023 and signed on its behalf by David Buckman , one of its directors.

This statement covers G4S Ltd and its group companies, with reporting companies proceeding with their own board approvals according to the Modern Slavery Act (2015).



An ALLIED UNIVERSAL Company