Modern Slavery Act Statement FY2025

Introduction

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 (the "Act") for the financial year ending 31 January 2025. It sets out the steps that we have taken to identify and reduce the risk of modern slavery occurring within our business operations and/or our supply chain and demonstrates the commitment of GardaWorld Security Corporation ('GardaWorld') to continually improve its practices to combat slavery and human trafficking.

Organisation Structure and Business

GardaWorld Security Corporation is headquartered in Montreal, Canada and is one of the world's largest privately-owned security organisations. It is divided into various business divisions, comprising: GardaWorld Cash Services; (Sesami); GardaWorld Security – Canada; GardaWorld Security – US; GardaWorld Security - Africa, GardaWorld Security - Critical Infrastructure & Government Services; GardaWorld Federal Services and Crisis24 comprising Travel Risk & Crisis Management, Executive Protection and specialised consultancy. GardaWorld provides services in over 45 countries around the world.

GardaWorld's UK subsidiaries required to report under the Act are members of the GardaWorld Security - Critical Infrastructure & Government Services Division ("CI&GS"): GW Consulting (UK) Limited, Company No: 5079338, Registered Address: Two London Bridge, London SE1 9RA, and Aegis Defence Services Limited (ADSL) also trading as GardaWorld, Company No: 4341965, Registered Address: Two London Bridge, London, SE1 9RA. This statement is made by GW Consulting (UK) Limited on behalf of itself and its group affiliates, including ADSL.

Supply Chains and Key Policies

GardaWorld CI&GS's supply chain relates to both the purchase of goods and services for internal use, and the purchase of goods and services procured in order to fulfil customer contracts. There are various preferred suppliers who support GardaWorld CI&GS operations, providing goods and services such as professional services, labour recruitment and management, uniforms, IT, vehicles, catering and security equipment and, in some instances, security services.

GardaWorld CI&GS is committed to ensuring that there is no modern slavery or human trafficking in its supply chains (where it is envisaged the greatest risk of modern slavery and human trafficking may occur) or in any part of its business. Strict codes and policies reflect its commitment to acting ethically and with integrity in all its business relationships, and to implementing and enforcing effective systems and measures of control to ensure the elimination of all opportunities for slavery and human trafficking throughout its supply chains. Below is a brief summary of key codes and polices which direct the implementation of this desired method of conducting operations.

- ***Code***

The GardaWorld CI&GS Code of Business Ethics and Standards of Conduct (the "**Code**") sets out its requirements and expectations with respect to key areas of responsible sourcing, including respect of international human rights standards and the prohibition of forced or coerced labour. All suppliers are expected to comply with the principles set out in the Code. They are expected to ensure that the obligations set out in the Code are met or that there is a clear timeline for full implementation within their own organisation and their associated suppliers and subcontractors.

The Code includes an express provision on the prohibition of human trafficking.

- ***Supplier Code of Conduct***

In July 2020, GardaWorld CI&GS introduced a specific "Supplier Code of Conduct" that it requires all of its suppliers to sign and adhere to. This draws upon the GardaWorld Code as well as the UN Guiding Principles on Business and Human Rights, the Montreux Document and the International Code of Conduct (ICoC), and covers a wide range of subject matters, with particular focus on prohibiting forced labour, human trafficking and child labour. It insists on integrity by suppliers in all areas of commercial and personal behaviour and has been introduced to ensure our commitment to driving out the potential for modern slavery is fully cascaded across all levels of the supply chain. The Supplier Code of Conduct complements our stringent due diligence processes which further operationalise our commitment to reducing the risk and opportunity for modern slavery across our business activities. The Supplier Code of Conduct was reviewed and updated in 2024 to include requirements to comply with the UN Global Compact principles, to which we also subscribe. This includes principles covering Human Rights, Labour and Anti-Corruption.

- ***Human Rights, Modern Slavery and US Combatting Trafficking in Persons***

The respect for and protection of human rights is central to the way in which GardaWorld CI&GS conducts its business. The GardaWorld CI&GS policy on Human Rights deals with respect for human rights including modern slavery and human trafficking.

This comprehensive human rights approach and risk assessment procedure, supported by our enhanced due diligence procedures for suppliers and strategic service providers, pay attention to matters related to human trafficking.

The employment of migrant labour is occasionally necessary when the availability of appropriately skilled local labour is scarce, or in order to meet specific client contract requirements (generally on government and diplomatic contracts in complex, high threat environments). GardaWorld CI&GS recognises that in seeking better work opportunities and livelihoods for their families and future, migrant workers are often outside the legal protection of their countries of national origin, which can make them vulnerable to abuse and exploitation. GardaWorld CI&GS has stringent provisions on anti-trafficking and training is provided to all staff. Policies are based upon the principles derived from protection and respect of human rights and the requirements of the US Combating-Trafficking in Persons regulations. Policies cover the use of recruitment agencies, accommodation and welfare standards and provide clear employment terms and conditions to help protect all staff (including those who are working away from their home country and the legal protections that this should otherwise provide them). Employment is freely chosen with no use of forced, compulsory, bonded, indentured or child labour. All staff, including migrant workers are offered roles under terms which have due regard to their health and safety, equality and dignity. Policies are developed to safeguard migrant workers from unscrupulous recruitment practices and help to prevent and manage any risks arising from their employment.

- ***Whistleblowing***

GardaWorld CI&GS believes the best way of maximizing the potential of individuals is to create a workplace environment where employees are valued and able to perform to their fullest potential. Minimising workplace conflict is essential to this process; GardaWorld is therefore fully supportive of our employees who wish to raise concerns or questions regarding the performance of their duties.

To ensure employees and all third parties are able to raise any concerns surrounding unethical practice or Human Rights abuses within the workplace in an anonymous and confidential way, GardaWorld launched a new, fully independent Whistleblowing Hotline in 2020. The hotline caters for all of our working languages and ensures that any employee, contractor or supplier that has any ethical concerns about the business is able to report such concerns either via the internet or by speaking to an independent telephone operator. Toolbox Talks are delivered to further enhance awareness on the topic.

In addition to our Whistleblowing Hotline, GardaWorld has a designated Whistleblowing Policy, which all employees are briefed on during their onboarding and pre-deployment training. The Whistleblowing Policy is accessible to all employees through Egnyte (our secure content platforms for file storage and retrieval), with hard copies available at those locations where access to a computer may not be so readily available. Further, the Whistleblowing Policy is also available via the GardaWorld website for all third parties to access. Such policies also ensure effective policing from internal sources, providing an even more comprehensive deterrent to any practices of modern slavery and trafficking.

In addition to the independent Whistleblowing Hotline, employees and contractors are encouraged to raise concerns through their management. If a concern relates to their line manager, details for the HR Senior Director and how to make discrete contact are listed on the Whistleblowing Policy.

Once a complaint has been received from the independent Whistleblowing Hotline provider, investigations are conducted internally and whistle-blowers are kept up to date as their complaint progresses. Disciplinary action may arise from a whistleblowing complaint.

- ***Grievance procedure***

GardaWorld CI&GS implements a comprehensive grievance mechanism. Grievances from all parties whether internal, external, individuals or companies via email, our independently hosted Whistleblowing Hotline or the submission of an online form available on our website, are dealt with through the complaints handling system.

If a complainant is not content with the outcome of a complaint, they have the right to appeal. The procedures described above mitigate the risk of slavery and human trafficking.

Due Diligence and Supplier Adherence to GardaWorld's Values

GardaWorld CI&GS has zero tolerance to slavery and human trafficking. To ensure all those in its supply chain and its contractors adhere to company values there is a rigorous supply chain compliance programme, supported by a Supplier Code of Conduct that clearly sets out GardaWorld CI&GS' expectations.

GardaWorld CI&GS reserves the right to audit any of its suppliers and their subcontractors to confirm that the requirements set out in GW-COR-PUR-FOR-019 Vendor prequalification and GW-COR-PUR-FOR-021 Vendor assessment/risk rating forms (as a form of due diligence) have been met. Suppliers confirm that any failure to allow an audit may result in the termination of any supply contract. If an audit identifies levels of non-compliance with the Code or the supply contract, the supplier will be required to provide a detailed remedial action plan. If the supplier refuses to comply with the action plan GardaWorld CI&GS is likely to terminate the relationship. GardaWorld CI&GS physically visits its suppliers from time to time and proactively looks at any suggestion of non-compliance with its policies, particularly with regard to forced labour and child labour. Gardaworld CI&GS also conducts due diligence on all of its strategic service providers in the form of an operational questionnaire, formal report and audit. This has specific requirements to comply with the standards we expect, including adherence to international and national humanitarian law.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and the business, GardaWorld CI&GS provides training to staff, highlighting these matters in the conduct of business. This training takes the form of online courses featuring multiple choice questions at the conclusion of each module, which are mandatory in order to successfully complete the training, together with training presentations being delivered. Training is provided to all new starters (cascaded through the business) and then refreshed on an annual basis.

Risk Assessment

Gardaworld CI&GS identifies human rights risks, including those associated with slavery and human trafficking via the Human Rights Impact Assessment. This is completed at corporate level and at each individual work location. This includes an analysis of the human rights principles in which we need to consider, identification of potential impacts to stakeholders and rightsholders, our current actions to mitigate risk and improvement actions where necessary. This is reviewed on an annual basis.

Effectiveness in Combatting Slavery and Human Trafficking

GardaWorld CI&GS has an integrated business management system which is independently certified by a UKAS accredited certification body to ANSI/ASIS PSC.1-2022, ISO 18788:2015, ISO 45001: 2018, ISO 14001:2015 and ISO 9001:2015. In addition, GardaWorld CI&GS is certified as an International Code of Conduct Association ("**ICoCA**") member, confirming its adherence to the International Code of Conduct that has human rights and a prohibition against modern slavery and human trafficking at the core of its standards.

The standards ANSI/ASIS PSC1-2022 and ISO 18788:2015 contain specific requirements for a business to demonstrate that it complies with all pertinent legal obligations and effectively mitigates any risk of slavery and/or human trafficking. External certification requires regular and independent audit of working practices, policies, procedures and training thereby providing further assurance to GardaWorld CI&GS of the reduced risk of slavery and human trafficking in its supply chain.

Further Steps

In the year ahead and as previously done, we will continue to implement best practice relating to combatting human trafficking and modern slavery across the business. In particular, we will continue to roll out revised policies and procedures across GardaWorld, in order to ensure alignment across the organization, with respect to amongst other matters, a zero-tolerance approach to modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes on behalf of Garda World Security Corporation and GardaWorld Consulting (UK) Limited and all other subsidiaries on slavery and human trafficking statement for the financial year ending 31 January 2025.



Janine Miller
Director
For and on behalf of GW Consulting (UK) Limited

Date: 14 July 2025