

ANNEX A - HUMAN RIGHTS POLICY STATEMENT OF INTENT

1. The development of standards, regulation and transparency within the Private Security sector led in 2010 to the development of the International Code of Conduct, of which GardaWorld Federal Services (GWFS)¹, along with other members of the GardaWorld corporate group, was a founding signatory. GWFS's policy is to embrace and support the development of international Standards deriving from the Code and at all times to achieve adherence to Standards recognized by the International Code of Conduct Association. This commitment and the commitment to comply with legal obligations and best practice are set out in our Human Rights and Professional Standards Policy.
2. GWFS's overarching approach is to recognize the human rights of all "rights holders" with whom it comes into contact. GWFS's policy is to respect the culture, religion and ethnic customs, human dignity and human rights of the communities and countries in which its personnel and subcontractors work. All company personnel shall to the best of their ability and wherever possible, rigorously oppose violation of these rights. Part of the risk management process carried out at all levels is to include an assessment of the impact of GWFS operations on those rights holders and, where appropriate, consultation shall take place with such rights holders as part of mitigating any potential human rights impacts.
3. GWFS will seek to ensure the inclusion and fair and equal treatment of all personnel in our working environment, regardless of his or her ethnic or social origin, color, gender, gender identity, religion, nationality, sexual orientation or other distinguishing characteristics.
4. GWFS policies and procedures require that consideration be given to the engagement-where possible and appropriate-of the local community who may potentially be affected, at all stages of project design, implementation and completion.
5. GWFS has in place clearly documented internal and external third-party grievance and dispute resolution processes that are transparent, equitable and predictable, to enable the remediation of any adverse human rights impacts they cause or to which they may contribute. These processes include whistleblowing, grievance and complaints procedures to investigate any alleged non-conformance with the Business Management System or with the requirements of applicable laws, regulations and contract requirements. The third-party grievance process is available on the Company website and is communicated to clients and local stakeholders' in-country, such as through the use of simple posters.
6. GWFS has in place supplier selection, due diligence and contract management policies that seek to ensure compliance across its teammates and suppliers worldwide. GWFS is conscious of the impact it may have as an employer in economically and/or socially fragile countries. The Company respects the social rights of its employees and of the communities with which it comes in to direct and indirect contact through its activities.
7. GWFS applies a consistent and rigorous approach to human rights impact assessment as articulated in its HRIA methodology set out in the Human Rights Risk Assessment Standard Operating Instruction. This requires a strategic company-level Human Rights Impact Assessment (HRIA) to be undertaken on a regular basis. Project specific (tactical) level HRIAs are to form an element of the GWFS risk management process.

¹ GardaWorld Federal Services (GWFS) is a registered "doing-business-as name" of Aegis Defense Services, LLC (Aegis). Aegis is a cleared U.S. company and subsidiary of GardaWorld Security Corporation. Aegis operates pursuant to a Special Security Agreement (SSA) that is approved by the U.S. Government Defense Security Service (DSS). The SSA ensures that Aegis maintains Foreign Ownership, Control and Influence (FOCI) mitigation controls between Aegis and its foreign affiliates to protect U.S. classified information and unclassified export-controlled information and maintain Aegis's independence in performing classified contracts.

Approved By:



Pete Dordal,
President & Chief Executive Officer
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