

**CODE OF BUSINESS ETHICS AND STANDARDS OF CONDUCT**  
**STATEMENT OF CONFORMANCE**

1. GardaWorld Federal Services (GWFS)<sup>1</sup> provides security services in circumstances where weakened governance creates complex, fragile and hostile environments. Our customers, host nation and home governments, the communities within which we operate, our partners and our suppliers rely on us to operate in a responsible manner that enhances human safety and security and which protects assets (both tangible and intangible) while conforming to all applicable laws, regulations and contracting requirements and safeguarding human rights.
2. Every aspect of our business practice and service delivery is governed by our Code of Business Ethics and Standards of Conduct and our corporate Business Management System (BMS).<sup>2</sup> These are founded upon our commitment to respecting human rights and follow the principles of 'Protect, Respect and Remedy'. In order to demonstrate our credibility in applying these principles, we ensure that our entire way of doing business is externally accredited, on a global basis, to a number of International Standards<sup>3</sup> which encompass the full scope of our business functions and services.
3. In complex operating environments, a host nation's own ability to protect human rights may be diminished. Other states and parties may also be known or suspected of acting in a way which has an adverse impact on human rights. In these circumstances, our rigorous application of the principles enshrined in our Code of Business Ethics and Standards of Conduct assists us in minimizing the risk of our own actions causing adverse impacts upon human rights.
4. We respect our people, customers and the communities within which we operate by acting upon firmly held, communicated and administered principles of fairness, equality, integrity and dignity. Our responsible approach, operating our BMS within our robust Legal Operating Framework, includes:
  - a. Using a formal, enterprise-wide procedure for the management of internal and external risk, applied to all aspects of our business processes and decision-making, at all levels (in accordance with ISO 31000).
  - b. Applying a rigorous, fair and risk-based process for the selection, recruitment and vetting of our people, our partners, our suppliers and, where appropriate, our customers.
  - c. Providing a healthy and safe working environment for all of our people, to the extent possible based on local conditions, wherever they are and whatever duties and responsibilities are assigned to them.
  - d. Promoting and maintaining the assurance of quality of service across all of our business processes and services (Externally certified to ISO 9001, covering all of our operations

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<sup>1</sup> 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.

<sup>2</sup> Our code is founded upon the International Code of Conduct for Private Security Service Providers (ICOC), the Montreux Document, and all applicable local, national and international laws and regulations. We are a founding signatory of the ICOC.

<sup>3</sup> ANSI/ASIS PSC.1-2012, ISO 18788, and ISO 9001.

- globally).
- e. Managing and reducing potential impacts of our business operations on the human, built and natural environment around us.
  - f. When risks are realized and disruptions occur, protecting our stakeholders by ensuring that we are prepared, rehearsed and ready to respond rapidly and coherently to resolve the impacts and restore stability, regardless of the levels of scale or complexity.
  - g. Embedding a culture of professional excellence through training, education and talent management for all of our people, across all business disciplines and at all levels.
  - h. Diligently assessing and demanding compliance with the International Code of Conduct for Private Security Providers when selecting potential customers, associates, suppliers, partners and contractors.
  - i. Employing, contracting and fairly compensating all of our personnel and suppliers in accordance with laws, regulations and standards applicable in each and every country of operation.
  - j. Monitoring and auditing our business transactions and activities in accordance with strict rules and processes to ensure prudence and probity in all of our business relationships
  - k. Firmly rejecting and condemning all forms of bribery and corrupt practice at all levels and in all countries of operation.
  - l. Adhering to applicable rules and regulations pertaining to the procurement, import and export required for the delivery of our services.
  - m. Respecting the individual rights of all of our personnel in accordance with all applicable laws, regulations and standards.
  - n. Through our service delivery, facilitating freedom of movement for our customers and other key stakeholders within the countries, regions and communities wherein we operate.
  - o. Through the employment and contracting of services of individuals and groups within local communities where our customer contracts permit, we shall contribute to growth, stability and sustainability of these communities.
5. In the event that a disruptive or undesirable event occurs<sup>4</sup>, we manage the full range of resulting impacts, minimizing adverse effects and restoring our services, rapidly and seamlessly. Where these incidents involve an adverse impact on human rights, we will take all available steps to remedy these issues, specifically:
- a. We operate a formal and confidential process for receiving and responding to internal and external grievances.
  - b. The Company maintains a fair and robust disciplinary process which is employed when

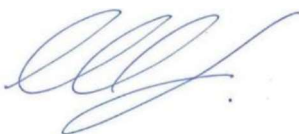
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<sup>4</sup> Any event that has the potential to cause loss of life, loss or damage to our assets/revenue or those of our customers, degradation of our corporate reputation and that of our customers or which negatively impacts upon human rights and fundamental freedoms of internal or external stakeholders.

the Company's Code of Business Ethics and Standards of Conduct is contravened.

- c. We respect the laws in all countries and localities in which we operate and will cooperate with and utilize government authorities, through judicial and non-judicial processes, as reasonably available and necessary.
6. We learn lessons from these events and continually improve our performance through performance evaluation processes that have been certified as effective by external auditors.
7. All of our personnel and tiers of management are formally allocated responsibility and accountability for the management of risk, assurance of quality and adherence to the values and standards covered within this statement.
8. The GWFS senior management team is responsible for providing top management direction, guidance and the moral and physical resources to enable these levels of responsible governance and compliance to be met and sustained.
9. If you wish to explore any aspect of this statement further, please enquire through your existing account or line manager.
10. If you wish to express a grievance of any kind, confidentially or otherwise, please contact [ethics@garda-federal.com](mailto:ethics@garda-federal.com).

Signed:



Pete Dordal  
President  
GardaWorld Federal Services  
Date: May 8, 2020