GardaWorld Federal Services' (GWFS)[1] is a security service provider that operates across the United States, and internationally in challenging 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, contracting requirements, and safeguarding human rights.

Every aspect of our business practice and service delivery is governed by our Code of Business Ethics and Standards of Conduct, guided by relevant international standards, and maintaining our commitment to company values. These are founded upon our commitment to respecting human rights and follow the principles of 'Protect, Respect and Remedy'[2]. To demonstrate our credibility in applying these principles, we ensure that our entire way of doing business is in compliance to the International Standards, applicable to our service offerings. The delivery of our security services as part of the Worldwide Protective Services (WPS) program is certified to ANSI/ASIS-PSC.1-2022 and ISO 18788:2015 (excluding clauses 8.5 (&A8.5) and 8.3.6 which are not requirements of the applicable programs), and ISO 9001:2015.

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.

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:

- 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 (Fully compliant with ISO 31000).
- 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.
- Providing the healthiest and safest working environment reasonably possible for all our people, wherever they are and whatever duties and responsibilities are assigned to them.
- Promoting and maintaining the assurance of quality of service across all of our business processes and services (Externally certified to ISO 9001, PSC.1 and ISO 18788).

[1] GardaWorld Federal Services (GWFS) operates pursuant to a Special Security Agreement (SSA) that is approved by the U.S. Government Defense Security Service (DSS). The SSA ensures that GWFS maintains Foreign Ownership, Control and Influence (FOCI) mitigation controls between GWFS and its foreign affiliates to protect U.S. classified information and unclassified export-controlled information and maintain GWFS's independence in performing classified contracts.

[2] Our code is founded upon the UN Guiding Principles on Business and Human Rights, 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.

- Managing and reducing potential impacts of our business operations on the human, built, and natural environment around us.

- 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.

- Embedding a culture of professional excellence through coherent, progressive and accredited programs of training, education, and talent management for all of our people, across all business disciplines and at all levels.

- Diligently assessing and demanding compliance with the International Code of Conduct for Private Security Providers and the UN's Guiding Principles when selecting potential customers, associates, suppliers, partners and contractors.

- 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.

- 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.

- Firmly rejecting and condemning all forms of bribery and corrupt practice at all levels and in all countries of operation.

- Adhering to applicable rules and regulations pertaining to the procurement, import and export required for the delivery of our services.

- Respecting the individual rights of all of our personnel in accordance with all applicable laws, regulations and standards, including ensuring and respecting freedom of expression in matters of faith, gender, culture, sexual orientation, and heritage in all aspects of our business.

- Through our service delivery, facilitating freedom of movement for our customers and other key stakeholders within the countries, regions, and communities where we operate.

- We shall contribute to the growth, stability, and sustainability of these communities by employing and contracting the services of individuals and groups within local communities where our customer contracts permit.

- Enhancing the quality of lives in the communities around us by providing social assistance programmes, cognisant of social, faith and cultural sensitivities and associated risks.

If a disruptive or undesirable event[3] occurs, 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 through both judicial[4] and non-judicial processes, specifically:

- We operate a formal and confidential process for receiving and responding to internal and external grievances, supported by the implementation of a whistleblower policy.

- The Company maintains a fair and robust formal disciplinary process, which is employed when the Company's Code of Business Ethics and Standards of Conduct is contravened.

[3] 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.

[4] Judicial Process here refers to due process in accordance with international law and the laws of the countries within which we operate, as defined in the operating licenses and other applicable agreements to which we subscribe.

- 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.

We learn lessons from these events and continually improve our performance through performance evaluation processes that have been certified as effective by external auditors.

All our personnel and tiers of management are formally allocated responsibility and accountability for managing risk, assuring of quality and adhering to the values and standards covered within this statement.

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.

If you wish to explore any aspect of this statement further, please enquire through your existing account or line manager.

If you wish to express a grievance of any kind, confidentially or otherwise, please contact ethics@garda-federal.com.

Signed By:

Original document signed.

Pete Dordal, President & Chief Executive Officer

Date: 6 July 2026