GARDAWORLD FEDERAL

GardaWorld Federal Services ("GWFS" or "Company") is committed to maintaining the highest standards of professionalism, and the following procedure is designed to provide a transparent and accessible process for addressing concerns raised by individuals or organizations affected by our activities.

GWFS employs an open-door policy across all operational locations, and employees are encouraged to raise their concerns through their immediate line management. However, if an employee feels unable or uncomfortable raising it with their management team, or that their concern has not been resolved at the project level, they may use any of the reporting methods below.

REPORTING CONCERNS

To raise a concern, please use one of the following methods, as applicable. Please provide as many details as you can to assist us with looking into your concern, e.g., what happened, who was involved and/or present, the relevant date(s), and the relevant location(s), together with any supporting documentation, if available:

- Via email: ethics@garda-federal.com
- Via hotline: +1 (571) 814-2915
- Via verbal or written submission directly to the GWFS Human Resources or Legal Departments
- Via verbal or written submission directly to a GWFS supervisor, site manager, or project representative
- Via letter to the Company's corporate address: 1700 N. Moore Street | Suite 1875 | Arlington, VA 22209

Reports made through the hotline, email, or by letter may be made anonymously, and people who wish to remain anonymous should state this preference at the time the submission is made. Nevertheless, the Company encourages the provision of contact information in submissions to allow the Company's designees to communicate with the complainant further (i.e., to seek clarification about the concerns raised), and/or to provide an update on the action taken, as needed.

The Company prohibits retaliation against any person who raises a concern in good faith or participates honestly in an investigation. Information shall be handled confidentially to the extent practicable, consistent with the need to conduct a thorough investigation and applicable law(s).

REVIEW AND PROCESSING OF CONCERNS

When a concern is received, GWFS aims to complete the following steps within the timelines below:

- Validate the concern within 48 hours of receipt to confirm whether it falls within the scope of GWFS operations, has been directed at the correct business unit within GardaWorld, and relates to an actual operational location
- The submission will be acknowledged within 2 to 3 business days of receipt, including an explanation of next steps and expected timeframes (where contact information is provided).
- Written updates as the matter progresses may be provided intermittently, as appropriate (where contact information is provided).
- Confirmation that the investigation and/or review has concluded will be communicated within 21 days of the acknowledgment (where contact information is provided).

Timeframes may be extended where circumstances require, including if the matter is particularly complex or involves a large volume of information, individuals or records across multiple entities or

jurisdictions, relevant personnel who are unavailable (i.e., due to rotation schedules or leave), and/or other circumstances outside the Company's reasonable control.

INVESTIGATION

The GWFS Legal Department or its designee is responsible for ensuring that all internal and external concerns are reviewed and, where appropriate, investigated. The investigation aims to establish facts objectively and identify any issues requiring remedial and/or corrective action.

Where appropriate, the GWFS Legal Department or its designee may prepare an investigation report and/or provide the relevant investigative findings to appropriate management personnel for further action. Consistent with company practices and privacy considerations, the Company may not be able to disclose the results of Company investigations, including personnel matters and/or actions involving other parties, to the complainant or other participants in the investigation.

If any concern raised identifies a breach of applicable law requiring disclosure to external authorities, the GWFS Legal Department will communicate, as appropriate, with relevant external authorities, and the Company will cooperate with any subsequent external investigation.

APPEAL

If the person raising the concern is dissatisfied with the outcome of a review and/or investigation, an appeal can be lodged within 14 days of the date the outcome is communicated to them. Appeals will be heard by the GWFS President or his designee.

The following timelines will typically apply to appeals:

- Acknowledgment of the appeal within 3 to 5 business days of receipt, including explanation of next steps and expected timeframes.
- Appeal decision communicated to appellant, within 21 days from acknowledgment.

Timeframes may be extended where circumstances outside the Company's reasonable control require.

EXTERNAL REPORTING

This grievance process does not restrict an employee's right to raise workplace concerns, to discuss terms and conditions of employment, or to report suspected wrongdoing. Nothing in this communication or in company policy prohibits a party from reporting possible violations of law, or from communicating with or providing information to any relevant government agency or enforcement authorities, with or without notice to the company.