

**FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN  
SUPPLY CHAINS ACT  
JOINT ANNUAL REPORT  
FOR  
GARDA WORLD SECURITY CORPORATION / CORPORATION DE  
SÉCURITÉ GARDA WORLD  
-AND-  
GARDA ALARM SERVICES CORPORATION / CORPORATION DE  
SERVICES D'ALARME GARDA**



**FOR  
FISCAL YEAR ENDING JANUARY 31, 2024**

**Introduction**

Garda World Security Corporation / Corporation de Sécurité Garda World ("**GardaWorld**") does not tolerate any form of human trafficking, child labor or slavery, including forced or bonded labor of any kind, and is committed to demonstrating the highest respect for human rights, playing a leading role in protecting against all forms of abuse and promoting greater protection in the supply chain. As a global security company with over 132,000 employees, our activities inherently involve human rights risks. By respecting and promoting internationally recognized human rights, we can ensure that work is a source not only of income, but also of dignity and motivation for the people we employ. Essential elements of human rights due diligence and control include a global commitment to human rights and an assessment of the impact of the company's activities on human rights. We are particularly vigilant about the risks involved in our operations and have developed systems to ensure fair employment practices throughout the organization. We adhere to best practice in human rights risk management, and our approach draws on both the core principles of the International Labour Organization and our membership Protecting All Components of Founding Society of the International Code of Conduct Association (ICoCA), a multi-stakeholder initiative created in 2013 to ensure that private security providers respect human rights and humanitarian laws. Along with the other signatories, we affirm our responsibility to respect human rights and fulfill our humanitarian responsibilities towards all those affected by our business activities, including staff,

customers, suppliers and the population of the region in which services are provided. We also recognize the importance of respecting the different cultures we encounter in the course of our work, and the people we come into contact with as a result.

GardaWorld's relationships with its business units and with suppliers, subcontractors, consultants, partners and other third parties working on behalf of the organization are an integral part of the company's supply chain. Consequently, all suppliers have a responsibility to respect ethical business practices, human rights, sustainable development and environmental practices as described in the Supplier Code of Conduct.

Within this framework, GardaWorld and its subsidiaries are committed to complying with the requirements of the Act.

Consequently, this report is made in accordance with the provisions of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “**Act**”) for the fiscal year ending January 31, 2024. It outlines the steps we have taken to identify and reduce the risk of modern slavery within our supply chain and demonstrates GardaWorld's commitment to continuously improving its practices to combat modern slavery and human trafficking.

### **Organization Structure and Activities**

Headquartered at 2300 rue Émile-Bélanger in Montréal, province of Québec, Canada (H4R 3J4), GardaWorld is one of the largest private security firms in the world. Divided into several business units, the organization's services include physical security, cash handling, cash ecosystem management and integrated risk management. GardaWorld as well provides monitoring and security services through its subsidiary, Garda Alarm Services Corporation / Corporation de Services d'alarmes Garda (« **Garda Alarm** »).

Among these business units, the reporting requirements under the Act are applicable to only Garda Alarm, as it sells or distributes goods in Canada and elsewhere, and import goods produced outside Canada, and to GardaWorld, as the parent company who controls Garda Alarm.

### **Supply Chains and Key Policies**

GardaWorld's supply chains described in this report mainly concern the procuring of monitoring and security equipment that will be sold to Garda Alarm's customers.

GardaWorld is committed to ensuring that there is no modern slavery or human trafficking in its supply chains. Our codes and policies reflect our commitment to act ethically and with integrity in all our business relationships, and to implement effective procedures and control measures to ensure the elimination of all opportunities for slavery and human trafficking throughout its supply chains. Below is a brief summary of the organization's governance structure, key codes and policies that guide the implementation of our commitments.

## **Governance Structure**

GardaWorld's Board of Directors (the Board) is responsible for implementing a governance structure to ensure that the principles of the corporate codes and policies are respected, promoted and effectively managed throughout the organization. In fulfilling this obligation, the Board has mandated the Governance Committee to oversee the interpretation, evaluation, review and consequent formulation of recommendations, modifications or amendments to the Codes and Corporate Policies. The Corporate Governance Committee advises the Board on the development of corporate governance standards for the Company, and on the review of associated procedures to ensure compliance with applicable laws and regulations. At the operational level, corporate codes and policies are overseen jointly by the Head of Corporate Security, the Senior Vice-President - Legal Affairs, the Chief Financial Officer and the Corporate Secretary.

## **Code of Ethics**

GardaWorld's Code of Ethics is the foundation of our commitments and is intended to guide our conduct in accordance with the high standards we have set for ourselves and must uphold. It is at the heart of who we are, and how we do business. It lays the foundation for our guiding principles, our organizational culture, expected workplace behaviors, the health and well-being of our employees, our human rights commitments, integrity in professional conduct, social & environmental issues, privacy and data confidentiality.

The [Code of Ethics](#) is available to everyone on the GardaWorld website.

## **Supplier Code of Conduct**

GardaWorld has zero tolerance for slavery and human trafficking within its supply chain. To ensure that all members of its supply chain and subcontractors adhere to the company's values, there is a rigorous supply chain compliance program, supported by a supplier code of conduct that clearly defines GardaWorld's expectations. The Supplier Code of Conduct details GardaWorld's requirements and expectations in key areas of responsible sourcing, including compliance with international human rights standards and the prohibition of forced labor. All suppliers are required to comply with the principles set out in the Code. They must ensure that the obligations set out in the code are met, or that a clear timetable is set for the full implementation of these obligations within their own organization and their associated suppliers and subcontractors. The Code contains an express provision on the prohibition of human trafficking. The Code is inspired in particular by the United Nations Guiding Principles on Business and Human Rights, the Montreux Document and the International Code of Conduct (ICoC). It also covers a wide range of subjects, with particular emphasis on the prohibition of forced labor, human trafficking and child labor. It insists on supplier integrity in all areas of business and personal behavior and has been introduced to ensure that our commitment to eliminating the potential for modern slavery is fully reflected at all levels of the supply chain. The Supplier Code of Conduct complements our rigorous due diligence processes, which embody our

commitments to reducing the risks and opportunities of modern slavery in our supply chains.

### **Declaration of Human Rights**

Respecting and protecting human rights is at the heart of how GardaWorld conducts its business. GardaWorld's Human Rights Statement addresses respect for human rights, including modern slavery and human trafficking. This holistic approach to human rights emphasizes the implementation of a risk assessment process, supported by due diligence procedures for suppliers and attention to human trafficking issues.

The Declaration is available to all on the GardaWorld website.

### **Whistleblowing Policy**

GardaWorld believes that the best way to maximize people's potential is to create a work environment where employees are valued and able to realize their full potential. Minimizing workplace conflict is essential to this process. GardaWorld therefore fully supports its employees who wish to raise concerns or report questionable practices.

To ensure that employees and all third parties are able to raise concerns about unethical practices or human rights violations in the workplace anonymously and confidentially, GardaWorld launched a fully independent ethics helpline (electronic and telephone) for whistleblowers in 2020. The helpline responds to all our working languages and allows any of our employees, contractors or suppliers with ethical concerns about the company to report them either via the internet or by speaking to an independent telephone operator. "Toolkits" are also available to raise awareness on this subject.

The Whistleblower Policy and Whistleblower Program are independent and managed by a third party (worldwide whistleblower hotline) and are available to everyone on the GardaWorld website.

### **Sustainability Reports**

Our Sustainability Reports detail GardaWorld's approach to sustainability. Developed in alignment with the United Nations Sustainable Development Goals and other globally recognized standards, our reports are based on three main pillars: security and trust, people and communities, and environmental impact. As one of the world's largest private integrated security companies, we are fully aware of our ability to have a positive impact on our employees, our partners and the communities in which we operate.

As a responsible company, GardaWorld fully supports the principles of the UN Universal Declaration of Human Rights and complies with the UN Guiding Principles on Business and Human Rights. Our Sustainability Reports detail how we address modern slavery issues within our global priorities, whether within our own company and our employees, our due diligence process towards third parties (suppliers and customers), as well as our key performance indicators in this area.

## **Determining the Risk of Forced Labour or Child Labour**

The GardaWorld Group primarily provides services in Canada and only exceptionally sells goods. Its revenue in Canada is not based on the sale of products. Consequently, although vigilant, the identification of risk zones associated with suppliers is limited. We consider the risk of forced or child labor in the supply chains to be low due to the nature and overall value of the goods sold.

### **Steps Taken to Assess and Manage the Risk Identified in our Operations and Supply Chains**

#### Supplier analysis

We have undertaken an initial analysis of our suppliers to ensure that our main business partners meet the highest ethical standards in terms of human rights and decent working conditions. To carry out our analysis, we drew inspiration from Pareto's Law (80/20), which stipulates that around 20% of our suppliers account for 80% of total expenditure per distinct supply chain.

In short, our approach enabled us to identify over a hundred suppliers accounting for just under 70% of the total expenditure covered by these measures with a total expenditure covered by these measures.

Subsequently, we consulted the websites of all the suppliers we identified to find information on the measures taken by each to control and prevent any human rights violations in their business dealings, including forced labor, child labor and all other forms of modern slavery.

We also examined the countries of origin of these suppliers and noted that most of these vendors are headquartered in member countries of the OECD (Organization for Economic Cooperation and Development). This finding is of significant importance, as OECD countries are subject to strict regulations on labor rights, the environment and ethical standards in supply chains. Thus, this observation suggests that our main suppliers operate in a regulated and supervised environment, which potentially reduces the risk of abuses in supply chains, such as child labor, unsafe working conditions or unfair trade practices.

We have also used the 2023 Global Slavery Index (GSI) as a basis for an exhaustive examination of the regulations surrounding the issue of modern slavery in our suppliers' countries of origin.

Subsequently, we pushed our investigation further for all suppliers from countries with a GSI prevalence index higher than 4 and for which little information was available, by having external investigation reports generated on the directors and their company that included:

- politically exposed directors (PEP), their close associates and family members;
- whether entities are state-owned and companies are state-financed;
- whether entities are on a global sanctions list;

- unfavorable media presence; and
- whether the securities are subject to sanctions.

Accordingly, based on our current analysis, we have no reason to believe that any of the suppliers in the supply chains under review are in breach of one or more provisions of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, or of the provisions of the International Labour Organization's core conventions on fundamental labour rights.

### Remediation

As we have not identified any event of forced labour or child labour in our activities or supply chain in the discussed financial year, it was not necessary for us to take any measures to remediate and rectify any incident of forced labour or child labour, including any loss of revenue by any vulnerable family.

If such an event occurs in our activities or supply chain and is brought to our attention, we will take all necessary and appropriate measures to remediate and rectify such event in accordance with established international standards.

### **Training**

When hiring our employees, to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and within the company, GardaWorld is currently developing training that will be accessible virtually to all its staff, focusing on these issues in the conduct of business. This training will take the form of online courses with multiple-choice questions at the end of each module, which are mandatory to successfully complete the training. A follow-up report will be submitted quarterly to the members of the Corporate Governance Committee.

When engaging new suppliers and hiring new employees, GardaWorld raises awareness and conveys the company's current codes and policies.

### **Assessment of Efficiency and Other Steps**

In the coming year, and as we have already done, we will continue to implement best practices relating to the fight against human trafficking and modern slavery throughout the company. In particular, we will continue to roll out revised policies and procedures across GardaWorld, to ensure alignment across the organization, with regard to, among other things, a zero-tolerance approach to modern slavery. Finally, to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and across the company, GardaWorld is currently developing training that will be accessible virtually to all its staff, focusing on these issues in the conduct of business. This training will take the form of online courses with multiple-choice questions at the end of each module, which are mandatory to successfully complete the training. A follow-up report will be submitted quarterly to the members of the Corporate Governance Committee.

## **Approval and Certification**

This report, for the financial year ending January 31, 2024, was approved by the Board of Directors of Garda World Security Corporation / Corporation de Sécurité Garda World, on May 30, 2024, and the Board of Directors of Garda Alarm Services Corporation / Corporation de Services d'Alarmes Garda, on May 30, 2024, pursuant to paragraph 11 (4)(b)(ii) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I hereby attest that I have reviewed the information contained in the report for the entities listed hereabove. Based on my knowledge, and having exercised reasonable diligence, I hereby attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year indicated above.

I have the authority to bind for GardaWorld and Garda Alarm.

*(s) Pierre-Hubert Séguin*

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Me Pierre-Hubert Séguin,  
Secretary for Garda World Security Corporation and Garda Alarm Services Corporation

Date: May 30, 2024