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North America Supplier Code of Conduct

Definitions

Allied Universal or the Company refers to Allied Universal Security Services, Allied Universal Technology Services, Allied Universal Event Services, Allied Universal Janitorial Services, Allied Universal Risk Advisory and Consulting Services, Michael Stapleton Associates, AMAG and Deposita and all of their subsidiaries, affiliates and related companies operating in the United States, Canada and Mexico.


Supplier, for the purposes of this document, means any business, subcontractor, contractor, vendor, investigator, consultant, agent, representative, individual, or legal entity that transacts with Allied Universal by supplying materials, goods and/or services for or on behalf of Allied Universal.

Client refers to any business, individual or legal entity that contracts with Allied Universal for goods, materials and/or services.

Procurement Team refers to Allied Universal employees with either Corporate Spend or Strategic Sourcing in their job titles.

Personal Information means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

Confidential Information means any non-public information that relates to the Company's business dealings.

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Purpose

Allied Universal pursues responsible procurement practices consistent with its Code of Ethics, its values, the Global Human Rights Policy and other company sustainability goals and objectives which are key requirements for doing business with Allied Universal.

This North America Supplier Code of Conduct (“Code”) sets out Allied Universal’s requirements and compliance expectations of Suppliers with respect to key areas of responsible sourcing. Adherence to this Code enables the Company to uphold its values and deliver top-quality products and services while fulfilling our commitments to our customers and stakeholders.

Allied Universal considers a Supplier’s violation of this Code grounds to declare that Supplier to be in material breach of any contract or supply agreement the Company has with that Supplier.

Objectives

This Code:

- Defines minimum standards that Suppliers are expected to maintain; and
- Provides a framework for the evaluation of current and prospective Suppliers’ fitness to do business with Allied Universal.

Scope

This Code applies to all Suppliers, as well as any third party those Suppliers might engage in furtherance of their work with Allied Universal. We expect all Suppliers to comply with this Code in good faith and to the best of their ability, taking into account the nature of their business, size, level of organizational complexity and operational realities. Mindful that our Suppliers have different capabilities, Allied Universal encourages Suppliers to communicate any concerns regarding their ability to fulfill their obligations under this Code. Allied Universal reserves the right to excuse a Supplier’s performance of any obligation under this Code that is inconsistent with the Supplier’s capabilities, upon demonstration of same and in consideration of the following criteria, among others:



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- the criticality or the Supplier's goods and services to Allied Universal and its Clients;
- how Supplier's inability to fulfill obligations of this Code affects Allied Universal's ability to comply with its legal, regulatory, compliance, health and safety obligations;
- how Supplier's inability to fulfill obligations of this Code affects Allied Universal's competitive advantage in marketplace; and
- how Supplier's inability to fulfill obligations of this Code affects Allied Universal's ability to protect its personnel, operations and confidential and personally identifiable information.

Expectations for Suppliers

Suppliers must comply with this Code. Suppliers are expected to ensure that the obligations set forth in this Code are already in place or that there is a clear timeline for the implementation of the obligations within Supplier's organization, as well as their associated suppliers and subcontractors.

Allied Universal is committed to the highest standards of business integrity. Accordingly, the Company will not tolerate any practice that is inconsistent with its values and the principles of honesty, integrity and fairness.

Allied Universal reserves the right to audit any Suppliers and their subcontractors to confirm the Code requirements are being met. Allied Universal expects Suppliers to cooperate with any such audit and deems a Supplier's refusal or failure to permit an audit grounds to terminate any agreement or other contract between Supplier and Allied Universal and its subsidiaries.

In the event Allied Universal identifies non-compliance with this Code, Allied Universal may require Supplier to provide a detailed corrective action plan within thirty (30) days to the Procurement Team or Allied Universal representative as identified in Supplier's contract.

Where compliance with this Code would lead to a conflict with or a violation of applicable laws or regulations, the Supplier shall promptly notify Allied Universal of the situation and explain how it intends to operate in a responsible manner without violating the laws or regulations in question.



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Business Ethics

Conducting ethical business in accordance with our values and Code of Ethics is of the highest importance to Allied Universal and we want to partner with Suppliers who share our commitment to ethics and integrity.

Building trust with our suppliers, we conduct all interactions with honesty and transparency, aligning with our Code of Ethics across all internal and external operations. All transactions will comply with applicable laws, regulations and ethical business practices. For a copy of Allied Universal's Code of Ethics, please visit www.aus.com.

The Supplier and its subcontractors must prioritize ethical conduct in their policies and procedures, with clear demonstrations of their practical implementation.

Sustainability

The development of sustainable business practices helps us increase the efficiency of our operations and reduce our resource footprint. In partnership with our customers, employees and Suppliers, Allied Universal is exploring energy efficient technologies, reducing waste and encouraging our stakeholders to think about their environmental impact.

We aim to work with Suppliers that support sustainability initiatives and will assist us in understanding and reducing supply chain effects on the environment.

Suppliers are required to adhere to all environmental laws applicable to their operations and dealings with and on behalf of Allied Universal. Allied Universal encourages Suppliers to develop a sustainable environmental policy aimed at reducing waste and minimizing any harmful effects their operations have on the environment. Allied Universal requires Suppliers to provide it with details of their environmental policies and practices upon request, and to supplement, update and provide future data and information as needed to comply with Allied Universal's own sustainability strategy.

The Supplier agrees to:

- Act in accordance with relevant local, national and/or international environmental laws and regulations.



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- Minimize environmental pollution and make continuous improvements in environmental protection.
- When requested, provide details of its carbon emissions to Allied Universal as part of a Scope 3 GHG (Green House Gases, including but not limited to Carbon dioxide, Methane, Nitrous oxide, Hydrofluorocarbons and Perfluorocarbons) measurement requirement, including the proportion of their emissions that apply to work carried out for Allied Universal and its clients.
- Source and supply materials from sources in full compliance with the United States' Customs-Trade Partnership Against Terrorism (C-TPAT).
- Not source and supply materials from individuals or entities listed by the U.S. Department of Treasury, Office of Foreign Assets Control ([OFAC](https://home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-information)) as sanctioned (<https://home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-information>).

Prohibition Against Corruption and Bribery

Bribery and corruption in any form is prohibited. Suppliers may not offer, make, promise, request or accept a bribe, kickback or any improper payment, gift, favor or other item of value in connection with Allied Universal's business. Allied Universal expects its Suppliers will:

- Comply with applicable local, national and/or international anti-bribery and corruption laws and regulations.
- Not offer services, gifts or benefits to anyone, anywhere in order to influence their conduct in relation to Allied Universal.
- Maintain adequate procedures to prevent their employees and others performing services on their behalf from paying and receiving bribes.
- Not evade taxes or help any other party evade taxes.
- Mitigate appropriately against any real, potential or perceived conflict of interest through their work with Allied Universal. A Supplier with a position of influence gained through a contract should not use that position to unfairly disadvantage any other Supplier or reduce the potential for future competition, for example by creating a technical solution that locks in the Supplier's own goods or services.

Report immediately any known or suspected instances of corruption and bribery to Speak Out via aus.ethicspoint.com or telephonically at (888) 260-5948 (U.S. and Canada) or (800) 926-0023 (Mexico).



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Respect for the Basic Human Rights of Employees

Suppliers must act in line with applicable local, national and/or international laws governing human rights.

The Supplier agrees to:

- Promote equal opportunities for, and treatment of, its employees irrespective of race, nationality, social background, disabilities, sexual orientation, pregnancy or maternity, political or religious conviction, sex, age; marital or civil partnership status or any other factor which cannot be justified.
- Not employ or make anyone work against their will or when their labor may be coerced and exploited, such as by threat, withholding personal documentation, bonded labor fees, or other action restricting the rights of the individual.
- Respect the personal dignity, privacy, and rights of everyone.
- Refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment, or discrimination.
- Prohibit behavior including gestures, language, and physical contact that is sexual, coercive, threatening, abusive or exploitative.
- Provide fair remuneration as per industry standards.
- Communicate Allied Universal standards to employees and workers actively engaged in providing services to Allied Universal.
- Comply with any local legislation relating to the application of regional or local living wage rates.

Anti-Slavery and Human Trafficking

Allied Universal strictly prohibits the use of modern slavery and human trafficking of any kind in its supply chains. Allied Universal recognizes the responsibility it shares with its Suppliers to operate in an ethical way to mitigate and eradicate any cases of human rights violation. Allied Universal expects its Suppliers to be open and transparent in the way they conduct business with Allied Universal and agree to:

- Comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes in force in the country where they are supplying goods and services to or on behalf of Allied Universal.
- Represent and warrant that they have not been convicted of any offense involving slavery and human trafficking; nor have they been the subject of any investigation, inquiry or enforcement proceeding regarding any offense or alleged offense of, or in connection with, slavery and human trafficking.



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- Notify Allied Universal as soon as they become aware of (a) any breach, or potential breach of the above bullets or (b) any actual or suspected slavery or human trafficking in a supply chain which has a connection with the goods or services provided to Allied Universal.

Health and Safety

Suppliers must comply with relevant occupational health and safety laws and regulations.

Suppliers must:

- Evaluate and control risks associated with their business operation, taking precautionary measures to avoid workplace accidents and illnesses.
- Provide employees with relevant and effective training to enable them to deliver their roles safely, ensuring that employees are trained on health and safety risks in addition to safe work practices.
- Ensure that training is commensurate with the risk posed by their role and any specific training required by Allied Universal or its customers is delivered.
- Raise in a timely manner any risks or concerns raised by the Supplier's employees that are related to Allied Universal or Allied Universal customer operations.
- Provide a work environment that is safe and conducive to good health.
- Provide employees with the necessary equipment to work without injury.
- Manage cases of workplace injuries and illnesses effectively.
- Appoint a senior manager with responsibility for the delivery of health and safety.
- Ensure there is sufficient professional health and safety expertise in place to advise and support the business operations.
- Provide a point of contact if requested, to consult with Allied Universal on matters relating to health and safety.
- Ensure that Allied Universal health and safety requirements are communicated to, understood and followed by any employees working on Allied Universal activities.
- Ensure that all accidents and incidents that occur while working directly on Allied Universal activities are investigated, and that corrective action is defined, taken and communicated to Allied Universal.
- Ensure an assurance and audit program is in place to maintain compliance.

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Firearms and Use of Force

Allied Universal expects Suppliers who provide armed services to only use firearms for the protection of life. Allied Universal expects the Supplier to ensure that all armed employees are licensed, trained and are physically and mentally capable of fulfilling the role.

The Supplier is required (i) to have robust policies and procedures in place that are consistent with Allied Universal’s Use of Force Policy and do not violate local laws and regulations for the use of force relevant to the jurisdiction where the Supplier operates on Allied Universal’s behalf; and (ii) to comply with Allied Universal’s Use of Force Policy. In the event of a conflict between the Supplier’s Use of Force policies and procedures and the Allied Universal equivalent standard and where Allied Universal’s policies and procedures might be more restrictive than local rules, the Allied Universal standard will prevail and apply unless a violation of law would result.


The Supplier is required to report and investigate any breaches of firearms or rules of force policy requirements to the Procurement Team or Allied Universal contact as identified in Supplier’s contract.

Supply Chain Diversity, Equity & Inclusion

Allied Universal recognizes the importance of diversity, equity and inclusion in all aspects of its business. Allied Universal aims to work in partnership with diverse Suppliers and will provide access to resources, material and training where appropriate to enable diverse Suppliers to remain both competitive and supported within the Allied Universal supply chain. Suppliers are encouraged to review Allied Universal’s [Diversity Equity and Inclusion Policy](#).

To deliver an effective and sustainable supply chain, Allied Universal seeks to engage diverse and inclusive Suppliers within the local communities where we operate.

All Suppliers that have certified diversity status can utilize the following Request for Information ([RFI](#)) to express their interest in transacting with Allied Universal. Please note that submission of the completed RFI by the Supplier does not commit Allied Universal to any formal commercial relationship or agreement with the Supplier. When suitable opportunity presents, Allied Universal will make every effort to evaluate and transact with capable and qualified diverse Suppliers.

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RFI Link: <https://app.smartsheet.com/b/form/8ebedef18029445aa291179ab3f9bc27>

The Supplier agrees to:

- Use reasonable efforts to promote among its own Suppliers compliance with this Code.
- Provide Allied Universal with details of their Diversity, Equity and Inclusion policy, and with evidence of how that policy is put into practice, upon request.
- Ensure its own supplier selection processes are transparent, objective and non-discriminatory and provide fair and equal opportunities for all organisations.
- Confirm the ability to report periodically to Allied Universal on workforce diversity related issues as required.
- Consider the economic, environmental and social consequences of its choice of design, materials, manufacture, production, logistics, service delivery, operation, maintenance, recycling and disposal, as well as how best to address any ill effects of same.

Screening of Employees

Suppliers must undertake employee pre-employment screening in compliance with all local laws and in line with the relevant industry standards for all employees, including subcontracted employees who provide services directly to Allied Universal.

Notwithstanding the following, Suppliers must at all times ensure their personnel are properly licensed and credentialed to perform the contracted services. For all employees working in security related roles, including any subcontracted employees, Allied Universal's standard background screening requirements or Client-specific background screening requirements will apply and form part of any contractual terms of agreement.

Business Continuity Planning

The Supplier shall be prepared for any disruptions of its business (e.g., natural disasters, terrorism, software viruses and pandemics). This preparedness includes disaster recovery plans to protect employees as far as reasonably possible from the effects of disasters that might arise within the domain of operations.



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Record Accuracy and Retention

The Supplier shall ensure that business records relating to Allied Universal are securely retained for the period required by law, and that they accurately and fairly reflect all business transactions.

Data Protection

The Supplier shall ensure compliance with applicable local, state, national and international laws and directives providing for the protection, transfer, access and storage of personal information.

Privacy and Confidentiality

Allied Universal is committed to collecting, handling, processing, and protecting Personal Information and Confidential Information, and the networks and systems on which this information is stored, in compliance with applicable U.S. and international privacy and information security laws.

Any Supplier that obtains Personal Information or Confidential Information about Allied Universal is obligated to take precautions not to handle, view, or share such information outside the scope of their relationship with Allied Universal. Allied Universal considers Supplier's failure to protect Personal Information or Confidential Information grounds to terminate all agreements with the Supplier. Allied Universal reserves the right to pursue any civil action available to it in the event Supplier fails to protect its Personal Information or Confidential Information and to refer suspected criminal conduct to the appropriate enforcement authority.

Government, Media and Investor Relations

The Supplier shall not instigate any form of publicity or make any statement or submission to investors, the media or government referring to Allied Universal, without first obtaining prior written permission from Allied Universal (except where required by Government or applicable law). The Supplier must submit any such request to their relevant Allied Universal Procurement Team personnel or relevant member of the Company management responsible for the Supplier relationship for authorization.



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Management Commitment

The Supplier's governing body must commit to adopting or establishing a management system designed to ensure compliance with this Code and applicable laws and regulations; identify and mitigate related operational risks; and facilitate continuous improvement.

Cybersecurity

It is essential that Suppliers safeguard the integrity and security of their computer systems and comply with any relevant legal standards and guidance.

Suppliers must maintain the integrity, confidentiality, and security of Allied Universal data, ensuring it is not inappropriately altered or disclosed to anyone without a legitimate need to access and only for legally permissible purposes specified in the relevant service contract and/or subcontract agreement. Where a suspected or actual security breach is identified, suppliers must immediately inform Allied Universal.

Suppliers must ensure that any third parties they engage in connection with their work for Allied Universal also follow these requirements.

Reporting, Cooperation and Non-retaliation

Suppliers must uphold the standards outlined in this Code, which includes reporting any suspected violations of those standards. If you observe potential violations of the law or this Code, you must immediately report the matter to the highest-ranking Allied Universal employee you are doing business with, the Allied Universal Speak Out Hotline or Allied Universal's Chief Compliance Officer. You do not need to be certain that a violation has occurred to make a report. In fact, it is important to report any suspected or potential ethical issue.

Allied Universal fairly, objectively and thoroughly examines every ethics concern and, if necessary, takes immediate corrective action. Allied Universal endeavors to provide the person who reported the concern (if that person identified themselves) with information about the outcome. Supplier agrees to cooperate with Allied Universal in the investigation of reports of suspected misconduct. Such cooperation includes, but is not limited to, making available for audit, inspection or duplication relevant documents and information, as well as making employees available for interviews. Allied



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Universal does not tolerate retaliation in any form. Allegations of retaliation will be taken seriously, investigated and addressed appropriately.

Allied Universal Speak Out Hotline

[Aus.ethicspoint.com](https://aus.ethicspoint.com)

U.S. and Canada (888) 260-5948

Mexico (800) 926-0023