

Anti-Corruption and Anti-Bribery Policy Statement



Background

Corruption is illegal. It impedes economic growth, distorts competition and has a very negative impact on societies across the world.

ISS has always had very strict rules against the practice of corruption and bribery in its business. As signatory to and supporter of the United Nations Global Compact (UNGC) since its inception in 1999, ISS has made a strong commitment to combat the use of corruption, extortion and bribery, wherever we do business.

In ISS we apply high ethical standards in the conduct of our business, and we compete on fair terms and solely on the merits of our services, without compromising our integrity or our business relationships. Our business integrity is non-negotiable and we do not allow budgetary or other commitments to justify a violation of this central principle.

This policy statement summarises the fundamental principles of the ISS Anti-Corruption and Anti-Bribery Policy ("Policy").

Fundamental Rules

To ensure that ISS maintains high ethical standards and to avoid violations of anti-corruption and anti-bribery laws, ISS has adopted the ISS Code of Conduct, which includes the following basic rules on anti-corruption and anti-bribery to guide the behavior of our employees:

- 1) ISS is against any form of corruption and bribery and is committed to combat such practices;
- 2) ISS competes for business on fair terms and solely on the merits of its services;
- 3) Regardless of local practice, any personal payments, kickbacks or bribes between ISS and customers, suppliers or public servants are strictly prohibited;
- 4) It is unacceptable to receive gifts or other gratuities from business partners – unless customary in the environment, of modest value and serving a business purpose.

As a global services provider we also operate in countries, where laws on anti-corruption and anti-bribery are flawed, not followed or enforced. Regardless of the local laws, the ISS Code of Conduct and the Policy shall as a minimum be applied and govern the behavior of ISS employees.

Facilitation payments

ISS forbids the use of facilitation payments.

Political contributions

No political contributions – direct or indirect - are allowed unless they have been decided by and approved by the ISS Board of Directors. ISS is a member of employer unions and other branch associations which may support certain political matters or organisations in the interest of its members.

Business partners

The standards of the ISS Code of Conduct and the Policy apply to all our suppliers and business partners.

When selecting a supplier or business partner, we carry out due diligence and screen against a global sanction list before entering into an agreement. We ensure that the supplier or business partner is familiar with the ISS Supplier Code of Conduct and the Policy, that compliance with the ISS Supplier Code of Conduct and the Policy is included in all agreements and that the written agreement with the supplier or business partner contains a right of termination in the event that the supplier or business partner acts in a manner inconsistent with the ISS Supplier Code of Conduct or the Policy.

Training

All managers within the ISS Group are responsible for ensuring that employees are familiar with the content of the ISS Code of Conduct and that they obey the rules.

As part of their on-boarding, new employees receive information about and training in the ISS Code of Conduct. To support the training and onboarding, ISS has a mandatory Code of Conduct e-learning training programme for all leaders and support staff in ISS.

Enforcement, monitoring, and reporting

ISS has a zero-tolerance policy towards employees, suppliers and business partners who violate anti-corruption and anti-bribery rules.

ISS Group Internal Audit reviews and monitors compliance with the ISS Code of Conduct and the Policy in its audit programmes. The Business Integrity Committee of the ISS Group is responsible for reviewing the Policy and investigating reports of possible violations of the anti-corruption and anti-bribery rules.

ISS has an Escalation Policy and a 'Speak Up' Policy reporting system is in place for reporting of serious matters such as violation of the Policy.

Annually the ISS Group reports on anti-corruption and anti-bribery matters in its Corporate Responsibility Report.

Honesty

We respect

Entrepreneurship

We act

The ISS Values

Responsibility

We care

Quality

We deliver

ISS has adopted a Speak Up Policy to make it possible for employees of ISS, business partners and other stakeholders to report any serious and sensitive concerns in a secure and confidential way.

A Speak Up Guide is available at www.issworld.com/about-iss/our-approach-to-cr/speak-up/speak-up-guide to help you assess if your concern is (a) a local matter that should be reported to your supervisor, manager, local HR/People & Culture director, local legal counsel or local CFO or (b) a serious and sensitive concern that should be reported to Group via a secure and externally hosted reporting system available at the website of ISS in your country or at www.issworld.com/about-iss/our-approach-to-cr/speak-up/ or via a telephone hotline +44 2036301701.

You can also contact directly:

Dan Otzen

Head of Group Internal Audit

ISS World Services A/S

Buddingevej 197, DK-2860 Søborg, Denmark

Email: Dan.Otzen@group.issworld.com

Phone: +45 38 17 68 00

All inquiries will be treated confidentially and in accordance with the ISS Speak Up Policy.

