



Global Code of Ethics

A Guide to Business Ethics, Compliance, and Workplace Conduct

Updated January, 2022





To truly excel, in every aspect of our lives, we must be phenomenal. This is critical to professional success and personal development. When we exist at a higher standard we can reach our goals, execute on our mission and live our culture... and be there for our clients and colleagues.

Be Phenomenal® or Be Forgotten.



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A MESSAGE FROM THE CEO

Dear Fellow Employees,

At Allied Universal®, we have seen a tremendous amount of growth over the years. One aspect that never changes is our commitment to operating with the highest ethical standards and leading with integrity as we help safeguard our communities, people, and assets.

Our Global Code of Ethics is an important part of this commitment. To be a strong company on the outside, we must be a strong company on the inside. Our Code provides us all with the tools necessary to make sound business decisions and sets a foundation for our long-term success. In short, it is our North Star.

How we conduct our business and how we treat others will continue to determine how the world views Allied Universal. We have an obligation to our employees, shareholders, customers, suppliers, community representatives, and other business partners to be honest, fair, and forthright in all our business activities. Each of us is responsible for supporting our core values by performing our jobs in accordance with the law, company policies, and our Code.

Our Code also requires good judgment. It cannot cover every situation you may encounter in your daily work. It does, however, cover a variety of topics to equip us with skills necessary to make the right decisions.

Familiarize yourself with our Code, and please join me in making the commitment to uphold it in all that we do as Allied Universal employees.

Best Regards,

Steve Jones
CEO, Allied Universal®



QUICK REFERENCE GUIDE

Who to Contact

To report a potential violation of the law or this Code, or for more information or to seek guidance on ethics-related questions or concerns, employees should contact their direct supervisor or Human Resources representative.

How to Report

Reports may also be made anonymously through the Allied Universal [Ethics Hotline](#).

Additional Policies

The specific policies referenced in this Code can be found on the [Allied Universal intranet](#). If you do not have access to the Allied Universal intranet, contact your direct supervisor or Human Resources representative. Employees are responsible for strict adherence to these policies and are obligated to complete any and all required trainings. Employees working outside of the U.S. must be aware that the Company's policies may differ from country to country based upon each country's laws and regulations.

Please be aware that nothing in this document, or any other Allied Universal policy, should be interpreted as interfering with any employee's right to engage in protected concerted activity, to report violations, or any other right protected by applicable laws in your jurisdiction.

Additional Support

If additional support is needed, employees may contact their Human Resources representative.

Contacts, Resources, and Policies Appendix

Contacts and Resources

- ▶ [Allied Universal Ethics Hotline](#)
aus.ethicspoint.com
[1-888-260-5948](tel:1-888-260-5948) (U.S.)
- ▶ [Human Resources Directory](#)
my.aus.com/sites/hr
- ▶ [Chief Compliance Officer](#)
[1-484-567-3667](tel:1-484-567-3667) (U.S.)
- ▶ [Allied Universal Intranet](#)
my.aus.com

Policies

- ▶ [Policies Index](#)
my.aus.com/sites/hr
- ▶ [Anti-Human Trafficking Policy](#) ▶
- ▶ [Business Entertainment and Gifts Policy](#) ▶
- ▶ [Global Anti-Corruption Policy](#) ▶
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- ▶ [Social Media Policy](#) ▶
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OUR
CORE VALUES

Trusted
Reliable
Forward-thinking
Courageous
Caring
Nimble and Responsive

EXPECTATIONS UNDER OUR CODE

Allied Universal is governed by the conviction that business conduct is as equally important as business performance. We must maintain the highest ethical standards when carrying out our daily work activities, as our behavior in the workplace affects our success and shapes our reputation. This includes treating all people fairly, protecting safety and privacy, complying with all applicable laws and regulations, and upholding best business practices at all times.

Employee Responsibilities

Our Global Code of Ethics (“Code”) sets out core principles that provide a framework for our business decisions. All Allied Universal personnel are expected to conduct themselves in accordance with the Code and in compliance with all applicable laws in all circumstances, including those not specifically enumerated in this Code. Our Code applies to Allied Universal® Security Services, Allied Universal® Technology Services, Allied Universal® Event Services, Allied Universal® Janitorial Services, and Allied Universal® Risk Advisory and Consulting Services, and to all of its subsidiaries, affiliates, and related companies both in the United States and internationally (collectively referred to as “Company” or “Allied Universal”). In business situations where Allied Universal does not have full control over the entity, representatives of Allied Universal shall use their influence to achieve adherence to the spirit and content of our Code.

Employees must also be aware that some clients may have Codes of Ethics or other guidelines that they may be required to follow. Employees should review such guidelines with their supervisor.



Labor and Employment Consideration

Nothing in this document, or any other Allied Universal policy, should be interpreted as interfering with any employee’s right to engage in protected concerted activity, to report violations, or any other right protected by applicable laws in your jurisdiction.

Reporting and Non-Retaliation Policy

Employees must uphold the standards outlined in these guidelines, including by 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 your direct supervisor or through the Allied Universal [Ethics Hotline](#). You do not need to be certain that a violation has occurred in order 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 makes every effort to provide the person who reported the concern (if that person identified themselves) with information on the outcome.

If no action is taken by the person to whom the violation is reported, or if the employee believes the matter should be reported to a person in higher authority, the employee should bring the matter to the Chief Compliance Officer.

Allied Universal will not retaliate, or permit retaliation by others, against an employee for having made a good faith complaint or participating in any related investigation. Retaliation itself is a violation of our Code, with consequences up to and including termination. Please review the Company’s [Whistleblower Policy](#).

Consequences

Employees who are deemed to have committed violations of our Code or any applicable laws will be subject to disciplinary action up to and including termination. Allied Universal reserves the right to refer potential violations to regulatory and law enforcement authorities, if deemed appropriate under the circumstances.



Conduct in the Workplace

CONDUCT *IN THE WORKPLACE*

Diversity and Inclusion

Allied Universal is an Equal Opportunity Employer and does not tolerate discrimination against any employee or applicant on the basis of any legally protected characteristic or status. This policy applies to all terms and conditions of employment, including continued employment, promotions, evaluations, or other aspects of career development.

Anti-Harassment

Allied Universal is committed to ensuring that no employee is discriminated against or harassed by a supervisor, other employees, clients or their employees, or any other person in the workplace in violation of any and all applicable laws. All Company employees are responsible for maintaining a workplace free of harassing or discriminatory conduct, including but not limited to threatening conduct or comments based on any legally protected characteristics or status.

Fraternization

Allied Universal has fraternization rules for U.S.-based employees regarding an employee's personal or romantic relationships with other Company employees, vendors, Company clients, or an employee, tenant, or homeowner at the account to which an employee is assigned. Please contact your direct supervisor or Human Resources representative for additional information.



A safe, respectful, and inclusive work environment is paramount at Allied Universal.

Q I saw a supervisor harassing a coworker? Should I report them?

A *Yes. If you see something, say something. Allied Universal is committed to preventing harassment in the workplace, and will take immediate corrective action if harassment occurs.*



CONDUCT *IN THE WORKPLACE*

Use of Resources

Allied Universal prohibits inappropriate or illegal use of company and/or client property. Employees are trusted to use good judgment in the use of all Company and client-provided property, including but not limited to: all forms of printed and electronic media, including the internet; copy machines, scanners, and similar devices; telephones and mobile phones; desktop and laptop computers; and portable or wireless devices.

Employees may not use Company resources to transmit, store, or download materials that are in violation of applicable law (i.e., movies, unlicensed software, or stolen software) or that could be considered threatening, maliciously false, or obscene. The Company reserves the right to inspect and review the contents of all computers and other electronic devices, subject to applicable law.

In addition, employees are strongly encouraged to use only company-issued hardware and software to conduct business. If this is not possible or practical, please consult your supervisor.

Employees may have access to property of clients, including but not limited to, documents, furniture, and other property. Regardless of any written consent of the Client, employees may only utilize Client property in accordance with our Code.





Safety in the Workplace

SAFETY *IN THE WORKPLACE*

Health, Safety, and Security

Allied Universal employees are entrusted with maintaining the highest levels of safety and security for our clients. The Company expects all of its employees to review and abide by established safety policies and procedures and considers such a condition of continued employment.

Each branch and/or line of business is responsible for developing, administering, and complying with site-specific safety procedures; providing any required safety equipment to employees at no cost; and reducing the frequency and severity of work-related injuries or illnesses. All employees are responsible for reporting potential or actual hazards to health or safety, as well as any work-related injuries or illnesses, to a supervisor as soon as practical.

Workplace Violence

Violence has no place at Allied Universal and will not be tolerated. This includes intimidation, horseplay, violent acts, and threats of violence.

Substance Use

Allied Universal has strict standards regarding substance use in the workplace. Employees are not permitted to use, possess, or be impaired by alcoholic beverages, illegal drugs, or controlled substances in the workplace or while engaged in any job-related activity. Employees may not report to work under the influence of alcohol, illegal drugs, or controlled substances.

Weapons

Allied Universal has strict standards regarding weapons in the workplace. Employees are prohibited from possessing any weapon in the workplace or while engaged in any job-related activity, with the exception of employees who are working in armed positions and are properly authorized, licensed, trained, and registered to do so, or other properly authorized personnel.

Use of Force

Allied Universal seeks to be known as the industry leader in use of force training and response, and the management of armed security operations. We demonstrate commitment to this goal with effective inventory controls and training, and strict compliance with all Allied Universal policies, contractual obligations, and applicable laws and regulations. Allied Universal is committed to the safety of all Allied Universal employees, clients and communities that it serves and has strict standards regarding Use of Force. Allied Universal's primary responsibility in a security role is to detect and deter while involving law enforcement when needed. In Allied Universal new employee orientation and in ongoing training efforts, Allied Universal employees are educated on Allied Universal's expectations that Allied Universal employees avoid using force and instead use de-escalation techniques unless protecting themselves or others from immediate harm, to the extent permitted by applicable law.

Within our international businesses, where we provide care and rehabilitation services, the company complies with the standards for use of force, training, and incident review procedures set by the relevant authorities.

Anti-Human Trafficking

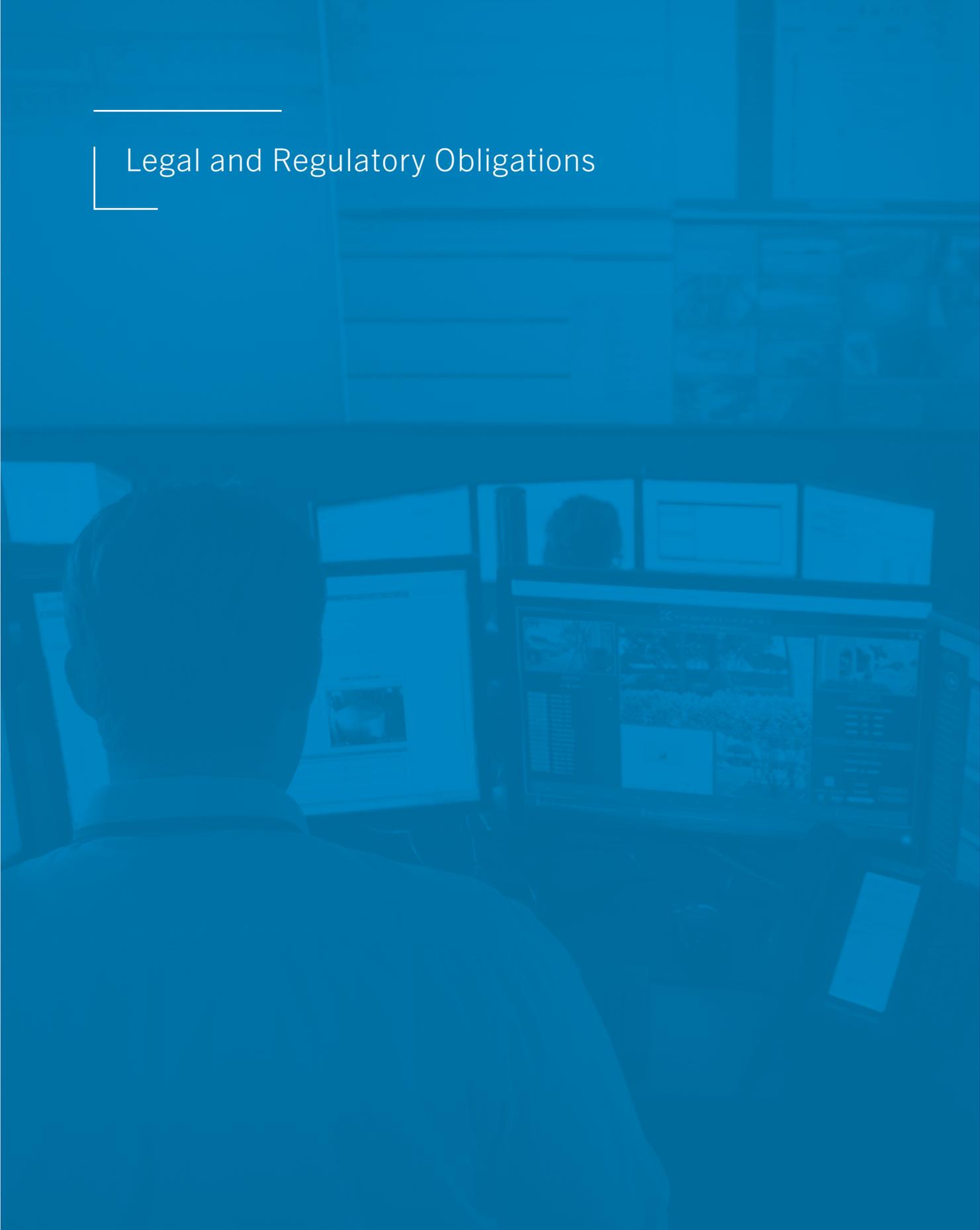
Allied Universal strictly prohibits any employees, agents, or subcontractors from engaging in the trafficking of persons or any related activity, as defined in the Allied Universal [Anti-Human Trafficking Policy](#). We take our responsibility to combat human trafficking seriously by following proper hiring requirements and labor laws in all jurisdictions where we do business, and by immediately reporting any evidence from any source that a Company employee, agent, or subcontractor has engaged in trafficking-related activity. Employees are to immediately report to their direct supervisor or the Allied Universal [Ethics Hotline](#), as well as law enforcement authorities, if in the course of their job duties they witness any individuals engaged in suspected trafficking-related activities.

Q Our work safety standards exceed what our competitors do. Can't we follow the same rules as them?

A *No. We must adhere to Allied Universal policies. Allied Universal is committed to the highest standards of workplace safety, and we want to be viewed as providing our clients with the best possible services.*



Legal and Regulatory Obligations



LEGAL AND REGULATORY OBLIGATIONS

Allied Universal is committed to the highest standards of regulatory compliance. The Company and its employees must comply with all federal, state, and local laws and regulations that are applicable to its business in all jurisdictions where the Company operates.

Bribery and Anti-Corruption Laws

Allied Universal employees must comply with all anti-bribery and anti-corruption laws applicable in the jurisdictions in which the Company operates, including but not limited to the United States Foreign Corrupt Practices Act (FCPA) and the UK Anti-Bribery Act 2010.

Employees are to be aware that “kickback agreements” are illegal and strictly prohibited by the Company. A kickback arrangement involves accepting or offering bribes or payoffs intended to induce, influence, or reward favorable decisions of any person or entity, including clients, vendors, or government personnel, in a position to benefit the employee or Allied Universal.

For additional information on Allied Universal’s expectations with respect to compliance with anti-corruption laws, please refer to the Company’s [Global Anti-Corruption Policy](#).

Insider Trading Laws

As an employee of Allied Universal, you may have access to material non-public information concerning the Company or its vendors, suppliers, or clients. Information is “material” if it is likely to affect the investment or voting decisions of the average shareholder or investor. Examples of material information include, but are not limited to: new service contracts, personnel changes, marketing strategies, proposed mergers and acquisitions, and financial results or other strategic plans. Information concerning Allied Universal is “non-public” if it has not been made available to the general public through a national news release or other mass media services.

While in possession of material non-public information, you may not engage in any action to take advantage of this information or pass it on to others, including but not limited to buying or selling Allied Universal securities (if and when publicly available). In addition, you should discuss this information only with those employees of Allied Universal who absolutely have a need to know it. These restrictions also apply to information relating to any other company, including clients and vendors, obtained in the course of your employment with the Company.

Q A new subcontractor failed to perform according to the subcontract agreement. A representative from the subcontractor offered me a pair of playoff tickets for a local sports team in exchange for a waiver of non-compliance. Can I accept the tickets?

A No. Accepting a payment in exchange for unwarranted favorable treatment under a subcontract may be considered a kickback and violates the federal Anti-Kickback Act.



LEGAL AND REGULATORY OBLIGATIONS

Antitrust and Unfair Competition Laws

Allied Universal is subject to antitrust laws in the United States as well as in other countries in which the Company operates. Antitrust and similar laws are intended to ensure that competition between companies is fair and to protect the public against business competitors who “collude” to unfairly set prices. You could be breaking these laws if you do things as simple as discuss with competitors pricing, terms and conditions of contracts, proposals, territories, or dealings with clients, vendors, or other competitors. You should be particularly sensitive to antitrust rules if you participate in trade associations or other meetings where competitors are likely to be present.

Any violation of the antitrust, competition, and trade practice laws could subject you and the Company to civil penalties and to criminal prosecution. This is a complicated area of law, so contact the Chief Compliance Officer with questions or concerns.

Copyright Laws

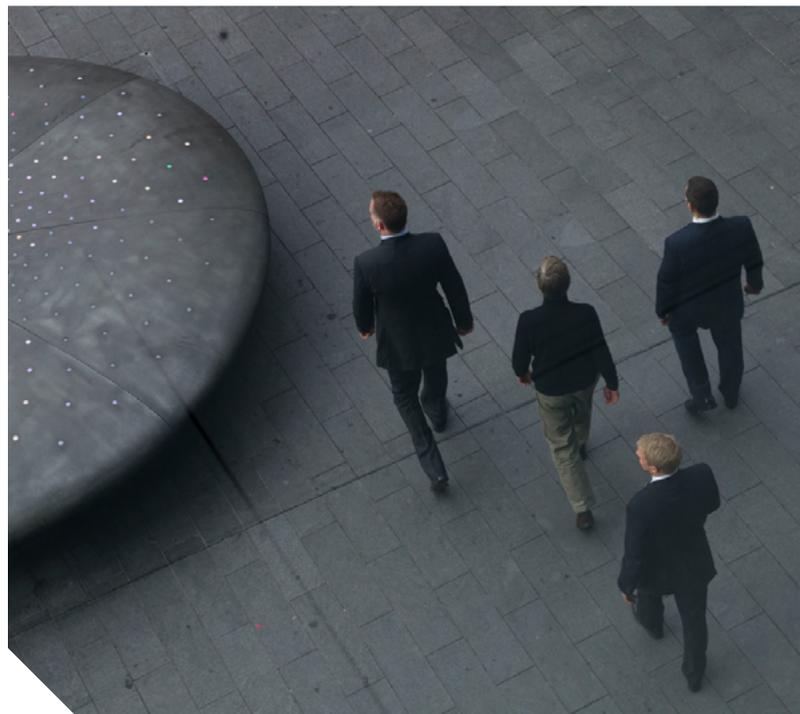
Allied Universal must follow laws pertaining to copyright protection in all jurisdictions in which the Company operates. This includes laws that prohibit duplication of print materials, licensed computer software, and other copyright-protected works.

Fraud and Theft

Allied Universal employees must not engage, directly or indirectly, in fraud, theft, embezzlement, falsification of records (including but not limited to timecards, injury reports, property claims, training records, and expense reports) whether paper or electronic, or any other activities that are illegal in the jurisdiction in which they are employed.

Government Services

Allied Universal serves many federal, state, local, and foreign government agencies and other public authorities. Allied Universal must comply with all laws and regulations applicable to relationships and potential relationships with such agencies and authorities and their employees. Laws regarding interacting with government agencies and their employees may vary among countries in which Allied Universal operates, and it is your responsibility to maintain awareness of the laws which may apply to you. Employees serving government clients must also follow the Company’s [Guidelines Applicable to U.S. Government Procurement Activities](#).





Best Practices: Business Dealings

BEST PRACTICES *BUSINESS DEALINGS*

Privacy and Confidentiality

In the conduct of its business, Allied Universal handles the personal information of its employees, clients, and the public, and also creates confidential proprietary business information. The Company is committed to collecting, handling, processing, and protecting personal 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, including but not limited to the General Data Protection Regulation 2016/679 (“GDPR”) and applicable data privacy laws in any jurisdiction where Allied Universal operates. This information includes:

Personal Information: Any information that relates either directly or indirectly to an identifiable person (for example: name, address, email, and phone number). Includes employee personnel files, compensation information, evaluations, disciplinary matters, psychological assessments, medical/diagnosis information, or any other personally identifiable information.

Confidential Information: Any information that relates to the Company’s business dealings, including but not limited to, financial, marketing and statistical data; competitive information, including the identity of clients, pricing, budgets, processes, and techniques; contemplated or pending mergers, acquisitions, or reorganizations; bid proposals to prospective clients and contract negotiations with prospective and current clients; research and development; business reports and summaries; and training materials and programs.

Failure to protect personal or confidential business information from disclosure could subject Allied Universal or you to civil and/or criminal action, give both Allied Universal’s and our clients’ competitors an unfair advantage, or lead to reputational damage.

Employees must take precautions not to handle, view, or share such information outside the scope of their job duties. Employees who inadvertently do so must protect this information from any further disclosure subject to applicable laws, including but not limited to the Health Insurance Portability and Accountability Act of 1996 (HIPAA).



Allied Universal is committed to the highest standards of business practices and ethics in all aspects of our work.



BEST PRACTICES *BUSINESS DEALINGS*

Conflict of Interest

Allied Universal employees have a responsibility to always act in the best interest of the Company. You cannot use your position with Allied Universal for personal gain.

A conflict of interest is any situation in which you, or a family member stands to receive an actual or potential personal benefit due to your position with Allied Universal. Employees must avoid any activities, relationships, and associations that might conflict with, or be perceived as conflicting with, the Company's interest, and must disclose any potential conflicts to the Company.

Q I received a gift worth \$20 from a vendor. The gift is within the Allied Universal guidelines, but I know that the vendor gave me the gift with the intent to influence my decision making. Can I keep the gift?

A **No.** *Inform your supervisor immediately and return the gift to the client. Employees should refuse any gift or offer that gives the appearance of something improper, even if it is within the gift amount guidelines.*

Entertainment, Gifts, and Gratuities

Certain business entertaining—including meals, social events, or training and educational activities—is an accepted business practice at Allied Universal, but the cost and scope of these activities must be reasonable and appropriate.

Gifts given to clients or potential clients should not exceed the aggregate value of \$100 per year per client. Gifts received should not exceed an aggregate value of \$25 per year. Employees must refrain from giving or accepting: cash, cash equivalents (such as Visa gift cards, stocks, checks, money orders, etc.), loans, lavish entertainment, or favors from clients, competitors, or vendors. You may vary from these rules only if you have received prior written approval from your direct supervisor in accordance with Company policies. Before accepting invitations for entertainment from clients, competitors, or vendors, you must check with your supervisor. Stay alert, use common sense, and do not put yourself or the Company at risk.

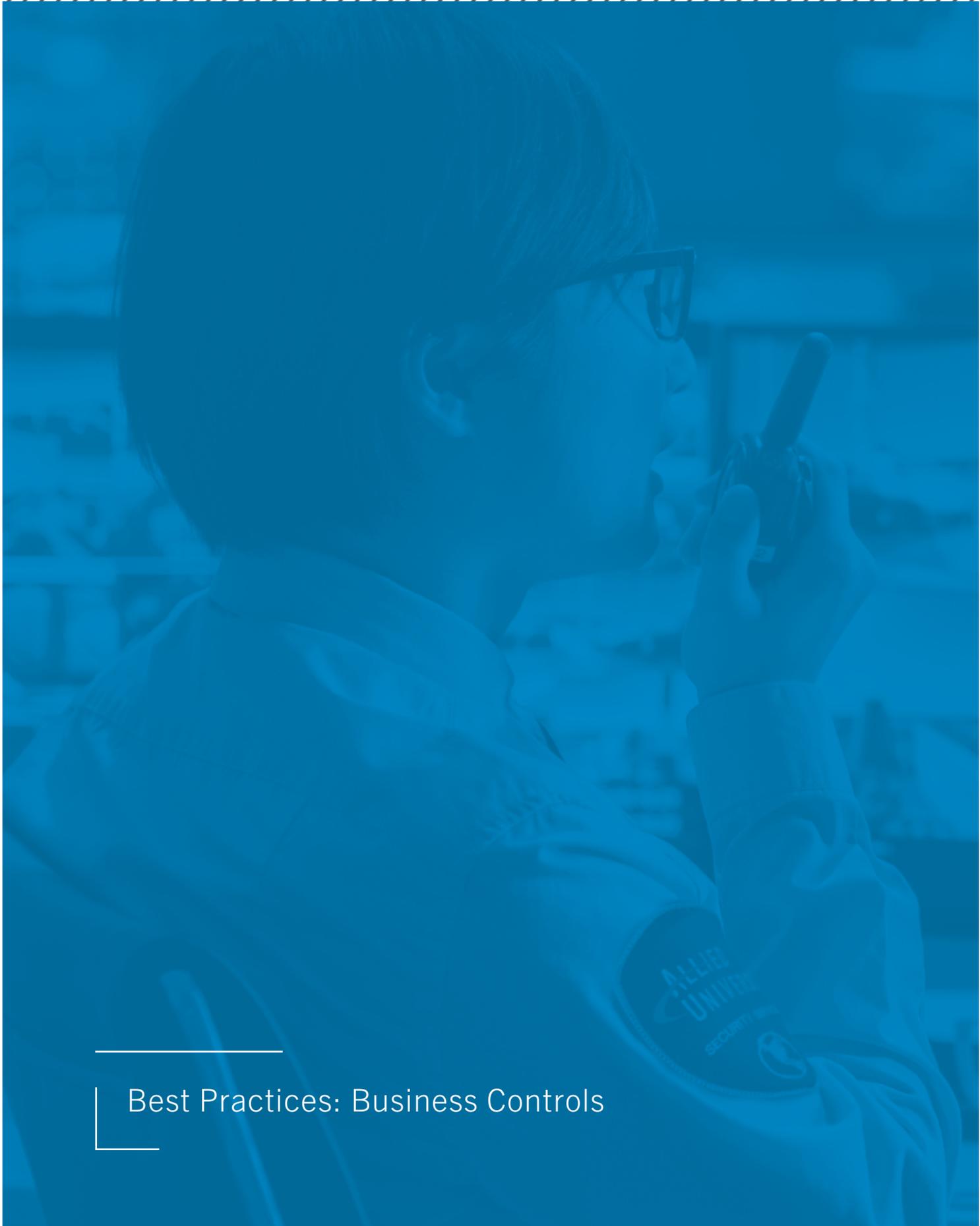
For additional information on Allied Universal's expectations with respect to providing and receiving entertainment and gifts, please refer to the Company's [Business Entertainment and Gifts Policy](#).

Special rules and laws apply to gifts and entertainment provided to government officials or employees. Allied Universal employees are strictly prohibited from providing to, or receiving from, government officials or employees any gifts, gratuities, or entertainment. Laws regulating gifts and entertainment provided to government officials may differ in the different jurisdictions in which Allied Universal operates, but Allied Universal's prohibition applies even if the law permits such gifts. Please reference the policy for Gift Giving – [Business Courtesies and Entertainment When Dealing With Federal Government Employees](#) for additional details.

Political Contributions

Allied Universal does not prohibit employees from voluntarily making personal political contributions, participating in the political process on personal time, or expressing their personal views on legislative or political matters. Any involvement by you in civic affairs or political activities is a personal choice. If you speak out on public issues, you must make it clear that you are speaking only for yourself and not for the Company.

Campaign finance and ethics laws, as well as Company policy, prohibit the use of Company funds, assets, services, or facilities on behalf of a political party except under limited circumstances. Further, Allied Universal is prohibited from compensating or reimbursing any employee, in any form, for any political contribution. Any political solicitation made during business hours on or at Company facilities must be approved in advance.



Best Practices: Business Controls

BEST PRACTICES *BUSINESS CONTROLS*

Sales, Marketing, and Advertising Standards

All Allied Universal employees, including but not limited to sales representatives, must adhere to fair, forthright, and legal sales and marketing practices and present only truthful, non-deceptive information.

Press and Social Media Policies

Employees are bound by Company policies regarding speaking with the media and posting information on the Internet.

Only designated Company spokespersons are permitted to speak to the press on behalf of the Company. If you are contacted by a member of the media, you must tell your supervisor immediately.

Employees who utilize social media or other Internet sites for personal purposes should carefully consider how the information they share impacts or reflects on the Company if they identify themselves as Allied Universal employees. Employees should not share or post online any of the Company's confidential or proprietary information or any information that would compromise a client's security or business operations or reveal personal information. For additional guidance, please review the Company's [Social Media Policy](#).

Q An acquaintance who works for a news organization asked me about a rumor that Allied Universal plans to acquire a new company. Can I comment on or off the record?

A *No. Only designated Company spokespersons are permitted to speak to the press on behalf of the company. In addition, employees must be careful not to share confidential or proprietary information about Allied Universal's business dealings.*



Q I came across a post on social media that involves an incident at a client site. Can I comment on the social media post with information about the individuals involved in the incident?

A *No. Employees should not share or post any information that could compromise a client's business operations or expose personal information of a client or members of the public. Please be mindful of how social media posts reflect on the Company.*

BEST PRACTICES *BUSINESS CONTROLS*

Recordkeeping, Accounting, and Internal Controls

Allied Universal strictly adheres to laws, regulations, accounting principles, ethical practices, and other criteria designed to ensure full accountability and reliability in its accounting records, systems, and financial statements. Sound accounting practices require that Allied Universal maintain books, records, and accounts that accurately and fairly reflect all transactions, as well as maintain an effective system of internal control to ensure integrity and completeness in record keeping. Employees are required to accurately collect, record, and report Company information, including payroll-related time and attendance records, test and training results, cost and pricing data, invoice billing records, purchase orders, and all other data that supports the company's books and records that are audited by an independent accounting firm on an annual basis.

Employees with responsibility for preparing and maintaining the Company's financial records must comply with Allied Universal's internal accounting policies and procedures, as well as with all laws and regulations governing record retention and preservation. To maintain the integrity of the Company's accounting records, Allied Universal's financial statements must be prepared in accordance with generally accepted accounting principles and must be supported by adequate documentation that provides a complete, accurate, and auditable record of the transactions that took place in the judgment of management. Absolutely no false or misleading entries may be made for any reason.

External Audits and Reviews

At least on an annual basis, Allied Universal engages an independent third-party accounting/auditing firm to audit its books and records. The selected accounting firm is also responsible for testing and assessing the quality and reliability of the Company's system of internal controls which are required to serve as the basis or foundation for the Company's financial statements. At times, the Company may also be subject to routine operational audits or inspections by federal, state, or local government regulators and inspectors, inclusive of tax auditors, insurance auditors, or other qualified inspectors. It is Allied Universal's mandate to fully cooperate with these audits or reviews and provide all necessary requested information promptly, completely, and accurately. During or prior to these audits or reviews, employees are prohibited from: concealing, destroying, or altering any documents or records; delaying communication of information or records; knowingly providing false or misleading statements or inaccurate information to auditors or inspectors; or otherwise obstructing access to information. If you have any questions or concerns about an audit or investigation at your site, consult your direct supervisor or the Chief Compliance Officer.





Applying Our Code to Your Job

HOW TO APPLY OUR CODE TO YOUR JOB

Ethical Decision Making Framework

All of us are confronted with complex workplace issues every day. To ensure that you handle these situations in accordance with the law, Allied Universal policies, and our Code, stop and consider the following before making a decision:



If the answer to any of these is “no” or “not sure,” then stop and reconsider your course of action. If you have questions or need additional guidance, consult your direct supervisor or the Chief Compliance Officer.

Additional Resources

Our Code is meant to provide an overview of Allied Universal's policies on workplace conduct, compliance with applicable regulatory and legal obligations, and ethical business practices. It is subject to change as the Company develops new policies and procedures and as government agencies and regulators modify their rules. Employees must familiarize themselves with the Company policies referenced in this Code, as well as all other applicable policies and procedures, and must complete all required trainings.

For additional support in understanding the laws, regulations, and practices that affect your work, contact your direct supervisor. If further guidance or interpretation is needed, contact your Human Resources representative or the Chief Compliance Officer.

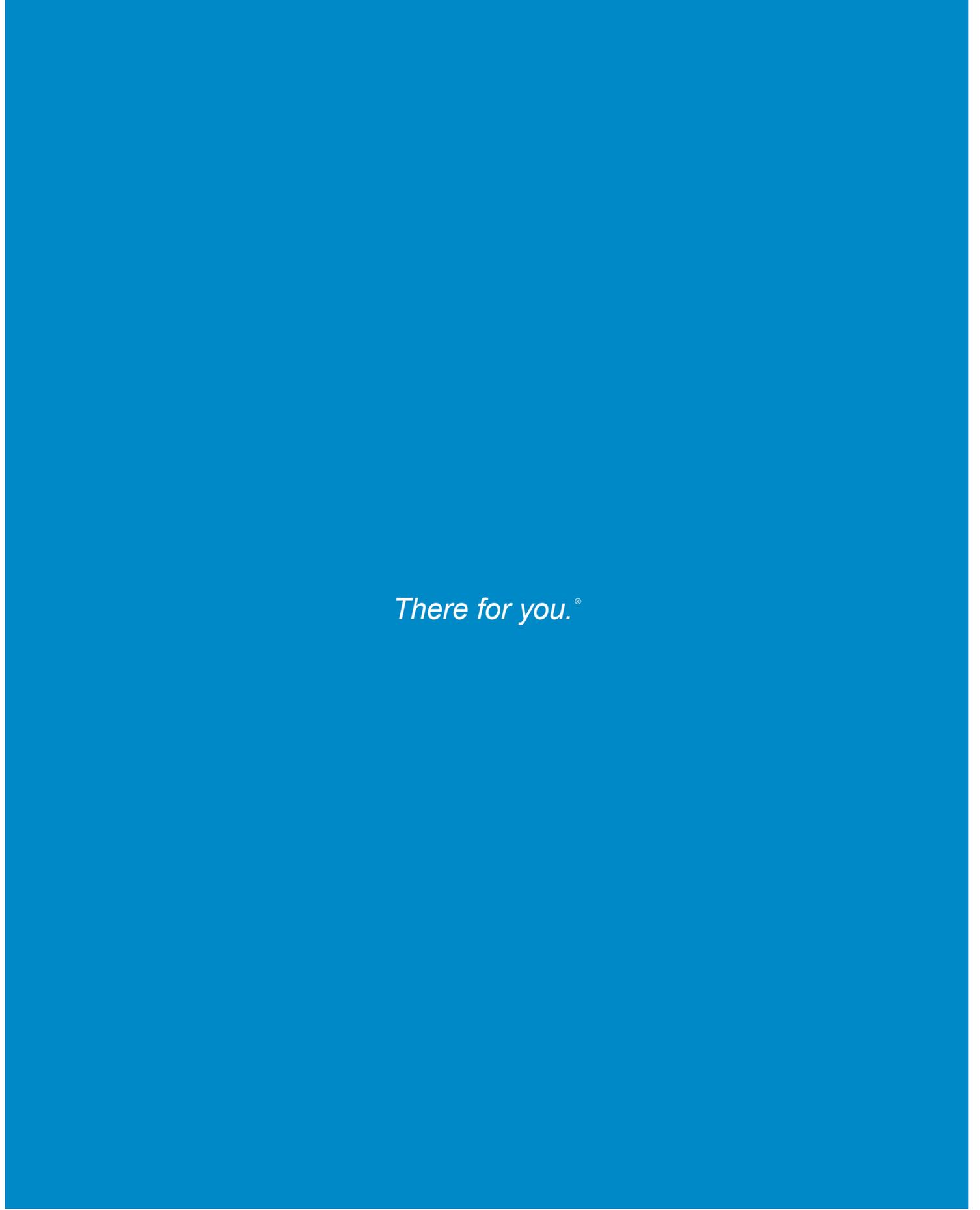
Most importantly, remember that any suspected violations of the standards set forth in this Code or of the law must be immediately reported to your direct supervisor or the Allied Universal [Ethics Hotline](#). All employees may report issues anonymously through this hotline, consistent with applicable laws. When you call or log on to the hotline, your report will be taken by a third party company, who will then direct the report to the appropriate individuals at Allied Universal for a thorough and complete investigation.

- ▶ [Allied Universal Ethics Hotline](#)
aus.ethicspoint.com
[1-888-260-5948](tel:1-888-260-5948) (U.S.)

I read and acknowledge the terms set forth in this Code.

[Employee Signature]

[Date]



There for you.®

