

April 22, 2019

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Allied Universal (the Company) requires its employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The purpose of this policy is to encourage and enable Company directors, officers, and employees to report any action or suspected action taken within the Company that is illegal, fraudulent or in violation of Company policies or applicable procurement law. This policy applies to any matter which is related to the Company's business and does not relate to private acts of an individual not connected to the business of the Company. It is intended to supplement but not replace existing policies that contain reporting elements.

Specifically, this Policy provides that:

- The Company maintains a reporting system whereby its employees, as well as third parties—where permitted by law— (such as competitors, vendors, and consumers) can and are encouraged to report suspected legal and ethical concerns, including workplace illnesses, injuries, and safety hazards, as well as concerns related to accounting, internal accounting controls, or auditing matters;
- All reported concerns should be submitted d

Federal statutes

“retaliation” includes, but is not limited to, any adverse action taken against an employee because he

Resolution Process in the Employee Handbook provides that the employee take the matter to his/her supervisor's supervisor. If the concern remains unresolved or if the employee is uncomfortable speaking with his/her supervisors, the employee should contact the branch or region Human Resources Manager/Director or contact Corporate Human Resources to discuss the situation and desired solution.

The Company encourages anyone reporting a violation to identify himself or herself when making a report in order to facilitate the investigation of the violation. However, reports may be submitted on a confidential basis by the complainant or may be submitted anonymously by contacting:

1-888-260-5948

or

[aus.ethicspoint.com](http://aus.ethicspoint.com)

*If you are a new user, you will need to create a username and password*

Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, to comply with all applicable laws, and to cooperate with law enforcement authorities. Additionally, the Company will explore anonymous allegations to the extent possible, but will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances from attributable sources.

Any manager or other individual who receives a report of a violation or a possible violation should refrain from conducting any independent investigation, and promptly forward the report to the Vice President/Deputy General Counsel, who will advise on next steps. The Company has established procedures for the receipt, investigation and resolution of all reports of possible violations of Company policies or applicable laws. Any such report will be evaluated promptly and investigated as appropriate. Except in the case of an anonymous report, the complainant will be informed that follow-up has or is occurring promptly after the report has been received and processed.

It is Company policy that, unless otherwise impractical, employees first exhaust internal reporting mechanisms before attempting to report violations externally. However, if internal reporting mechanisms have been exhausted to no avail, Company employees are protected under Federal laws from reprisals for external reporting. Specifically, FAR 3.903 prohibits the Company from discharging, demoting or otherwise discriminating against an employee as a reprisal for disclosing information to a Member of Congress, or an authorized official of an agency or of the Department of Justice, relating to a

substantial violation of