



ISS Speak Up Policy

Group Legal, June 2020



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1. Policy Statement

In line with the ISS Values and Code of Conduct, the business integrity of ISS is non-negotiable. ISS is committed to conducting our business in accordance with the law and high ethical standards.

This policy aims to:

- provide a platform for employees, business partners and other stakeholders to raise serious and sensitive concerns;
- ensure that such concerns are treated seriously and appropriately and
- re-assure that any person raising a serious concern in good faith will be protected from reprisals or retaliation.

2. Scope

This policy is meant to provide a secure and confidential channel for reporting serious and sensitive concerns that could have an adverse impact on the reputation, operations and performance of the business of ISS, and which, due to the nature of the concern, cannot be reported through the normal reporting lines. The nature of concerns could include:

- unlawful activity;
- financial fraud (e.g. accounting manipulation, non-compliance with internal control procedures, misappropriation of assets or fraudulent statements);
- bribery or corruption (e.g. conflicts of interest, bribery, sponsorships, donations, gifts or facilitation payments);
- acts by senior management that cannot be reported using local channels without risk of adverse impact;
- violation of competition laws (e.g. price fixing, exchange of price sensitive information or collusion with competitors);
- serious endangerment to environment, health or safety;
- activities, which otherwise by law, treaty or agreement, amount to serious improper conduct (e.g. discriminatory practices, sexual harassment, use of child labour or human rights violations).



3. Employment and workplace related matters - consult locally at first

Employees who have a concern are encouraged to discuss such matters first with their supervisors, managers or other appropriate personnel such as local People & Culture, local legal counsel or local CFO.

Concerns relating to the employment terms or local workplace matters such as conflicts with colleagues and managers, disciplinary sanctions, correct and timely payment of wages and benefits are outside the scope of this Speak Up Policy and should normally be resolved locally.

4. Reporting of a serious and sensitive concern



In case you wish to report a concern within the scope of the Speak Up Policy, you can report the matter by accessing the whistleblower system on our corporate website, <http://www.issworld.com/corporate-responsibility/approach-to-cr/speak-up> (the “Speak Up system”).

You are always welcome to report a concern in confidentiality to the Head of Group Internal Audit (please see contact details below).

5. Confidentiality

Registration of a submitted report is anonymous in the Speak Up system. The system does not log the IP address of the computer that is used to file the report and does not use cookies.

All communication will be anonymous and confidential unless you instruct otherwise. To facilitate investigation of the matter, you are encouraged to identify yourself and explain your concern in sufficient detail. Follow-up questions and investigation may not be possible unless the source of the information is identified. In order to assist ISS in conducting an investigation of a complaint, please provide as much information as possible.

When a complaint or concern is submitted by use of the Speak Up system, the complainant can choose to establish an anonymous mailbox in the system for communication purposes. ISS may in such case use this communication channel for follow-up inquiries and further dialogue, where relevant. The complainant can edit or supplement the complaint by use of the mailbox or directly in the system by use of complaint case number and password. The complainant may choose to close the communication channel at any time.

ISS will treat all concerns and issues raised under this policy in a confidential manner except to the extent necessary to conduct a complete and fair investigation. The identity of the complainant shall be kept confidential.

6. No discrimination or retaliation

ISS will ensure that there will be no discriminatory or retaliatory action against any employee or third party who reports a concern to ISS in good faith based on his/her personal knowledge. If a person believes that he or she has been retaliated against for reporting or participating in an investigation, he/she should immediately report such perceived retaliation to the Head of Group Internal Audit (please see contact details below). All such reports will also be investigated confidentially.

Allegations made in bad faith and without any factual substance may result in disciplinary or other appropriate action.

7. Handling of reported concerns

Each complaint or concern will be received via the dedicated Speak Up system hosted by an external provider and screened by an external law firm. In accordance with the instructions from ISS, the external law firm will forward the complaint or concern to the Head of Group Internal Audit, including an initial assessment of the report. The Head of Group Internal Audit shall (i) record all reported complaints or concerns, (ii) consider the seriousness and credibility of the complaint or concern raised and (iii) proceed accordingly in determining the appropriate action. Some complaints or concerns may be resolved without requiring investigation. Reports are forwarded via the Speak Up system where all communication and storage of personal data take place in an encrypted form and are protected by the use of password.

The Head of Group Internal Audit may, on his/her sole discretion, consult with the Audit & Risk Committee (or a body appointed by the Audit & Risk Committee) and any senior members of the management. He or she may also engage external auditors, investigators and/or legal counsel to assist in the investigation and analysis of the results thereof.

The conclusions of the investigation will be submitted to the Audit & Risk Committee. The Audit & Risk Committee may decide on placing any investigation report before the Board of Directors depending on the gravity and magnitude of the violation.

8. Remedial Action

Appropriate remedial action will be taken in case an investigation shows violation of ISS compliance policies and/or laws and regulations.

9. Processing of personal data

Collection, processing and any disclosure of personal data submitted via the Speak Up system will be carried out in compliance with applicable data protection laws.



9.1 The types of personal data processed by ISS

Unless the report is submitted anonymously, the report will involve processing of personal data about the individual reporting a relevant matter as well as the reported individual(s) and, in some cases, also other individuals mentioned in the specific report.

The individuals in question will be notified when a report is received, and an investigation is initiated, unless the notification needs to be postponed to ensure an effective investigation or if there are other material and justified interests of ISS, which are considered to outweigh the interests of the individual(s) being investigated.

The personal data processed as part of a report will be name and contact details as well as a description of the matter/incident which led to a report, including potentially a criminal offense under the applicable laws.

The examination of a reported matter may involve collection and processing of additional information, including information gathered via conversations with the individual reporting the matter, the reported individual, the employees and board members, business partners, shareholders or other stakeholders involved, where relevant and appropriate. The processing may also include information on potential sanctions under the employment law as well as content of any relevant notifications to authorities, including police reports.

9.2 The legal basis for processing

The processing of personal data in respect of any (potential) violation is based on ISS's legitimate interest to investigate a relevant matter and maintain an independent whistleblower system where an incoming report can be received and processed in line with the standards determined by ISS and reflecting our values.

Any relevant disclosure of personal data to public authorities, including the police, will be based on a legal obligation to disclose such information and/or ISS's legitimate interest to report relevant violations to the authorities.

The processing of personal data as part of a sanction pursuant to employment law, which is derived from a report, will be based on ISS's legitimate interests, such as consideration of our business and reputation as well as maintaining the standards required to hold job a position within the ISS Group.

9.3 The recipients of the personal data

The personal data collected via the Speak Up system may be disclosed to the relevant entities within the ISS Group, public authorities as well as third parties involved in the processing of the incoming reports. Such third parties are data processors acting on behalf of ISS and they may only process personal data subject to a data processing agreement and upon instructions from ISS.

9.4 Transfer of personal data to third countries

In certain situations, your personal data may be transferred to a country outside of EU/EEA. In such case ISS ensures an adequate level of security by transferring to countries approved by the EU Commission as having an adequate level of protection, or by entering into an appropriately drafted contract between ISS and the non-EU/EEA entity receiving the data. If you wish to obtain a copy of the appropriate safeguards provided for the transfer of personal data to third countries, please contact the Group Data Protection Officer (please see contact details below).

9.5 Your data protection rights

ISS has taken all necessary and adequate steps in order to protect the individuals reporting as well as the reported individuals and their personal data and ensure their rights as a data subject.

As a data subject you have several rights in accordance with the data protection laws. Please note that certain limitations may apply to your ability to exercise these rights, for example, when your right to obtain the information is found to be overridden by essential considerations of private interests. Subject to such limitations the following rights may be exercised:

- Right of access, e.g. you have the right to request access to your personal data and receive a copy of the personal data.
- Right to rectification, e.g. you have the right to rectify inaccurate personal data concerning you, including completion of incomplete personal data.
- Right to erasure - under certain circumstances, ISS is obliged to erase the personal data processed concerning you upon your request.
- Right to restriction - under certain circumstances, you have the right to restrict our processing of personal data concerning you.
- Right to data portability - where processing is based on your consent or performance of a contract with you, you have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format and transmit these personal data to a third party.
- Right to object - under certain circumstances, you have the right to object to our processing of your personal data.

If processing of your personal data is based solely on your consent, you may withdraw your consent at any time. Please note that this does not affect our processing of your personal data prior to the withdrawal of your consent.

If you wish to exercise any of the rights, please contact the Group Data Protection Officer (please see contact details below).

The individual reporting as well as the reported individual may at any time lodge a complaint with the relevant supervisory authority. In Denmark, the supervisory authority is the Danish Data Protection Agency (www.datatilsynet.dk).

10. Retention of the Records

ISS A/S may retain a copy of all complaints or concerns, investigation reports and all relevant documentation thereof as long as necessary for the processing and documentation of the complaint or concern in question.

Personal data collected via the Speak Up system will be deleted or permanently anonymised if the reported conduct is out of scope or obviously unfounded. Deletion will otherwise take place when the personal data no longer serves a purpose for the investigation or the investigation has been finalised. If authorities have been notified, the personal data will be deleted or permanently anonymised after the case is no longer investigated by the authorities.

11. Contact details

11.1 Point of contact regarding this Speak Up Policy



Head of Group Internal Audit

Email: issgi-speakup-all@group.issworld.com

Phone: +45 3817 6800

Ordinary mail to the following address: Head of Group Internal Audit, ISS A/S, Buddingevej 197, DK-2860 Soeborg, Denmark

11.2 Point of contact concerning personal data:



Group Data Protection Officer

Email: dpo@group.issworld.com

Ordinary mail to the following address: Group Data Protection Officer, ISS A/S, Buddingevej 197, DK 2860 Soeborg, Denmark

12. Version

Document version	
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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/speakup/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/speak-up/incident-reporting.

You can also contact directly:

Shane Horan

Head of Group Internal Audit

ISS World Services A/S

Buddingevej 197, DK-2860 Søborg, Denmark

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

Revision 6

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