

ISS GROUP

Data Ethics Policy



PEOPLE MAKE PLACES



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1 INTRODUCTION

On 1 January 2021, new legislation came into force for large and listed companies in Denmark to report on data ethics. The purpose of the legislation is to provide transparency in how companies work with data and encourage companies to take responsibility for how to manage data.

At ISS, we measure ourselves against high ethical standards in all aspects of our business, including data use. Therefore, the guiding principles for data ethics in this Policy must be followed, with focus on:

- Responsibility - strengthening governance and management of fundamental human rights;
- Inclusiveness - creating long-term value for all stakeholders, inclusion and engagement where we are present and in what we do;
- Leadership - ensuring the integration of fundamental rights in the design of our products and services.

1.1 Scope

By having data ethics integrated into our products and services, we are better positioned to ensure responsible and sustainable use of data. Therefore, the principles of this Policy apply to:

- ISS global operations, including all legal entities worldwide owned or controlled by the ISS Group ("ISS" or "ISS Group"), and all Employees and Executives of ISS;
- All natural and legal persons (and their respective Employees, Management, Board of Directors and beneficial owners) performing services for or on behalf of the ISS Group, including ISS Suppliers and Business Partners.

All principles, guidelines and rules referred to in this Policy must be followed along with other relevant corporate policies of ISS. Where stricter rules than those described in this Policy apply, the stricter rules must be followed.

1.2 Compliance

It is mandatory for **all ISS employees** as well as **ISS Suppliers and Business Partners**, who have access to data on behalf of or in collaboration with ISS, to use data responsibly by following the guiding principles in Section 2 below on data ethics. This includes applying a data-centric approach to ensure sustainability when using data.

1.3 Roles and responsibility

Group Legal and Global IT, Digitalisation & Services ("GITDS") are jointly responsible for implementation of and adherence to the ISS Data Ethics Policy including awareness training and integration with other Policies. Group Legal and GITDS report to Senior Management and are responsible for assessing:

- conformity
- compliance
- effectiveness, and
- need for revision

The Business Application Owner(s) (Business/Operations) and Technical Application Owner(s) (IT) of the systems and processes that are subject to this Policy are responsible for ensuring that the guiding principles set out in Section 2 below are observed.

1.4 Audit and monitoring

To enable the ISS Group (or its third-party professional representatives) to review and monitor compliance with this Policy, **Employees**, as well as ISS **Suppliers** and **Business Partners**, must provide access to all relevant:

- documents,
- records,
- systems,
- policies, and
- procedures.

Group Internal Audit carries out controls to ensure compliance with this Policy.

1.5 Adaption and publication

This Data Ethics Policy was adopted by Executive Group Management and the Board of Directors on 15 December 2021.

The Policy is available on the ISS website and in OPF (<https://opf.issworld.com/policies-standards>).

Group Legal and GITDS shall review the Policy at least once a year, and submit changes, if any, for approval. Unless changes to the Policy are material, changes can be approved by the Executive Group Management.

2 GUIDING PRINCIPLES FOR DATA ETHICS

The guiding principles for data ethics, as described below, sets the ethical standard for the use of data within ISS. The principles are based on the Charter of Fundamental Rights of the European Union.

2.1 Self-determination

Human self-determination must be a priority in all data processes. The individual shall to the extent possible ultimately control what their data is used for and in what context.

2.2 Human dignity

Human dignity must be respected in all data processes. Data shall not be used to exploit knowledge to the detriment of the individual's interests. This includes, e.g., protection of data against leaks and abuse by use of progressive technologies and encryption methods and protecting individuals from discrimination and misuse of data through organisational processes for data analysis and combination of data.

2.3 Responsibility

Responsibility and due diligence shall be exercised when using new technology, e.g., automated decisions, profiling, artificial intelligence, and data sharing with third parties. Risk assessments must be performed, and responsibilities clarified to external and internal users of such technology.

2.4 Equality and fairness

Processes, including machine learning and data processing algorithms, must be balanced and actively aim to prevent unwanted bias in data (e.g., sorting and washing of data) and promote designs that avoid categorisation, which discriminates between, e.g., population groups, ethnicity, race, etc. The standards and criteria for reducing bias and discrimination must be clear and transparent.

2.5 Progressiveness

Advanced data usage should aim to support positive progress for society. ISS strives to produce technical and organisational solutions that support progress and ethically responsible data management.

2.6 Diversity & Inclusion

Diversity is essential in teams working with data and data processes. Diversity ensures competencies, and the ability to identify and manage social and ethical consequences of data processing. Further, a diverse and inclusive culture supports representation of the needs and values of different social groups and enables such interests to be taken into consideration when designing data systems and processes.

2.7 Accountability

ISS is responsible for the data we store and use. Therefore, we are dedicated to ensuring robust governance of data processes in all parts of our organisation. Governance is essential in enabling ISS to establish processes that are based on informed decisions with due consideration of the guiding principles of this Policy.

3 DATA ETHICS AND ARTIFICIAL INTELLIGENCE

The application of data ethics is particularly important when developing and deploying data processing technologies based on AI systems. The dynamic nature of IA (such as machine learning or deep learning) inherently poses ethical challenges as the processing of data and the potential outcomes can be affected by the AI system itself.

To mitigate the risks associated with the use of AI systems, ISS apply the following principles when developing and deploying decision-making AI systems:

3.1 Responsibility

Development and deployment of AI systems must be supported by procedures to monitor the implementation of AI systems and mitigate unintended consequences of such implementation that are inconsistent with the guiding principles set out in this policy.

3.2 Accountability

When developing and deploying an AI system, ISS will designate a function and/or individuals for any such system to ensure compliance with this policy.

3.3 Transparency and explainability

When deploying an AI system, ISS must be transparent regarding the use of AI in decision-making processes and the intended purpose of any such system.

3.4 Fairness and non-discrimination

The outcome of decision-making AI systems should be measured against the same standards of decision-making performed by humans and enable fair and non-discriminatory outcomes.

3.5 Safety and reliability

AI systems designed to autonomously make decisions will only be acceptable if such systems operate on the basis of clearly defined principles and within boundaries limiting their decision-making powers.

AI systems must be tested thoroughly to ensure as stable and secure an operation as possible.

4 HOW TO REPORT NON-COMPLIANCE WITH THIS POLICY

Speak Up!

If you see a breach of this policy or if you have any questions, in general or with respect to a particular situation, always contact your manager, local management, local legal counsel or Group Legal (+45 38 17 00 00).

In case, you cannot report the issue to your manager or local management, you shall contact Head of Group Internal Audit or Head of Group Legal either by phone (+45 38 17 00 00) or through our secure and externally hosted [Speak Up reporting system](https://www.issworld.com/about-iss/speak-up/incident-reporting) available at your country website or <https://www.issworld.com/about-iss/speak-up/incident-reporting>.

Any communication will be taken seriously, handled confidentially and will be subject to a considered and objective review.

5 Document control

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Responsible	Group Legal and Global IT, Digitalisation & Services
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The ISS Values



To ensure good corporate governance ISS has adopted number of compliance policies and standards some of which can be found here.

ISS has adopted a Speak Up Policy to provide a secure and confidential channel for reporting concerns. The Speak Up Policy is available here (EN) and in other languages here. If you want to learn more about the Speak Up go to our Responsible Business Conduct & Speak Up webpage.

If you are an employee, customer, business partner or other stakeholder and believe there is a breach of the ISS Code of Conduct, our policies or relevant laws and regulations, we encourage you to speak up and report this.

Depending on the nature and seriousness of the concern, address your concern with your supervisor or a manager, local People & Culture, local legal counsel, or local CFO.

The Speak Up system is hosted by an independent third-party. The Speak Up system can be accessed through your local company website in your local language as well as on the Group ISS World Services website here.

You can also directly contact:

Head of Group Internal Audit

ISS World Services A/S

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

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