



SEXUAL HARASSMENT/WORKPLACE HARASSMENT POLICY

Sexual harassment, whether it occurs between a supervisor and a subordinate or between co-workers, cannot and will not be tolerated by G4S Secure Solutions (USA) Inc.

Definition of Sexual Harassment

Sexual harassment is a violation of Title VII of the Civil Rights Act of 1964 and it is against our policy for any employee, male or female, to sexually harass other employees by:

Making unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature a condition of an employee's employment, or

Making submission to or rejection of such conduct the basis for employment decisions affecting the employee, or

Creating an intimidating, hostile or offensive working environment by such conduct.

Types of Sexual Harassment

Sexual harassment may take different forms. Examples of several types of forms are:

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| Verbal | Sexual innuendoes, suggestive comments, jokes of a sexual nature, graphic commentaries, sexual propositions or sexual threats. |
| Non-verbal | Sexually suggestive objects or pictures, suggestive or insulting sounds, leering, whistling or obscene gestures. |
| Physical | Unwanted physical contact, including touching, pinching, brushing the body, coerced sexual intercourse or assault. |

Workplace Harassment

Consistent with the Company's policy on sexual harassment, it is also strictly against policy for employees to harass other employees on the basis of race, color, religion, gender, national origin, age, disability, sexual orientation, gender identity, genetic information or any other characteristic protected by law.

Definition of Workplace Harassment

Harassment under this policy, is verbal, non-verbal or physical conduct that denigrates or shows hostility or aversion toward another individual because of his/her race, color, religion, gender, national origin, age, disability, sexual orientation, gender identity, genetic information or any other characteristic protected by law, and that:

- Has the purpose or effect of creating an intimidating, hostile or offensive work environment; or
- Has the purpose or effect of unreasonably interfering with an individual's work performance; or
- Otherwise adversely affects an individual's employment.

Harassing conduct includes—but is not necessarily limited to—epithets, slurs, or negative stereotyping; threatening, intimidating or hostile acts; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group and that is placed on walls or elsewhere on the premises, or is circulated in the workplace.

How to File a Complaint

Employees who believe they are the victims of sexual harassment and/or workplace harassment have a number of options at their disposal: (1) Immediately contact their supervisor or , a manager; (2) File a complaint with the Employee Concerns Hotline by calling 800-307-9005 or on-line at www.myG4Sconcern.com; (3) Contact Corporate Human Resources Department at 800-506-6265. Upon request, we will provide a management representative who is the same gender as the employee to receive the complaint. Complaints will be investigated in a timely and thorough manner. They will be kept confidential to the extent practicable within the context of the investigation. Appropriate corrective action will be taken and a summary of the action taken will be provided to the employee.

Appropriate Discipline

If an investigation into a sexual harassment and/or workplace harassment complaint concludes that an employee violated this policy by harassing another employee, the violator will be subjected to discipline which may include termination of employment, regardless of his/her level.

Retaliation is Prohibited


It is strictly against Company policy to retaliate against an employee who either (1) has complained of sexual/workplace harassment and/or (2) has participated in sexual/workplace harassment investigations.

The Company will not retaliate against an employee who, in good faith, makes a complaint or report of sexual harassment or workplace harassment, or who participates in the investigation of such a complaint or report. Retaliation against any individual for good faith reporting of a claim of harassment or for cooperating in the investigation of same will not be tolerated and will itself be cause for appropriate disciplinary action, up to and including termination of employment.

Relationships/Dating

Corporate and Field Personnel: Employees are prohibited from establishing/having a sexual/romantic/dating relationship with their direct or indirect subordinates.

Corporate Personnel: Corporate Headquarters employees are prohibited from establishing/having a sexual/romantic/dating relationship any employee in the field within the scope of their influence.



Drew Levine, President