



INTERNATIONAL SOS

Safeguarding of Children and Vulnerable Adults

Version 1.04

Document Owner: **Legal**

Document Manager: **Group Director Human Resources**

Effective: **March 2026**

POLICY

**WORLDWIDE REACH.
HUMAN TOUCH.**

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Group	INTERNATIONAL SOS Safeguarding of Children and Vulnerable Adults		Policy
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EFFECTIVE DATE:	October 2025	DOCUMENT MANAGER:	Group Director Human Resources

Revision History

Revision	Rev. Date	Description	Prepared by	Reviewed by	Date	Approved by	Date
1.00	February 2015	Original Document	Revalidation Manager	Group General Counsel Group GM Professional Development	October 2015	Group Director Human Resources	October 2015
1.01	June 2016	Changed document classification from "Intl.SOS Internal" to "Public"	Group Manager Compliance	Group General Counsel Group GM Professional Development	June 2016	Group Director Human Resources	June 2016
1.02	March 2021	Periodic review	Group Manager Compliance	Group General Counsel Group GM Professional Development	March 2021	Group Director Human Resources	March 2021
1.03	September 2022	Annual review with the following updates: <ul style="list-style-type: none"> • Broadened document's Purpose (1.2.1) to cover "all people, especially children and vulnerable adults" • Broadened definition of Abuse (1.4.4) to cover acts of endangerment • Clarified the need for disciplinary action to be taken (2.3.3 & 3.1.1) where there are proven allegations of abuse as opposed to simply allegations 	Group Manager Compliance	People and Culture Manager	October 2022	Group Director Human Resources	October 2022
1.04	October 2025	<ul style="list-style-type: none"> • Update Introduction – background, scope, purpose and definitions (1.0) • Include guiding principles (2.0) • Create and maintain a Child and Vulnerable Adult-safe environment (3.2) • Include reporting requirements (3.4.1.) • Expand on recruitment procedures (3.4.2.) • Include Safeguarding@internationalsos.com and Keep Safe form (3.4.3.) • Expand on disciplinary procedures (3.4.4.) • Expand on compliance to local Safeguarding laws and international standards (3.4.6.) • Include responsibilities for all staff (4.1.) • Include Data Protection (5.0), and Regular Review (6.0) 	GM IAS	Regional Contracts Manager and Legal Counsel Pacific	October 2025	Group Director Human Resources; Group General Counsel	March 2026

Responsibilities

The Safeguarding of Children and Vulnerable Adults Policy applies to all employees of International SOS.

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1. INTRODUCTION

1.1. Background

- 1.1.1. International SOS is a world-leading provider of high-quality health and security services and expertise.
- 1.1.2. Through our activities and operations, we sometimes work directly with, and encounter, Children and Vulnerable Adults, as clients and as members of the communities in which we live and work. We recognise that International SOS employees and associated personnel are often in positions of relative power, trust, confidence and authority and that their decisions and conduct can have profound impacts on a Child or Vulnerable Adults' rights to life, survival and development.
- 1.1.3. In line with our Code of Conduct and Ethics, International SOS takes seriously our obligation to promote the rights and wellbeing of all Children and Vulnerable Adults to whom we owe a duty of care, treat them with respect and safeguard them from Harm.
- 1.1.4. Safeguarding people is a key priority that reflects both the focus on individual rights and many countries' legislated requirement to have regard for the need to protect and promote the rights of people who use health services.
- 1.1.5. International SOS has a key role in Safeguarding Children and Vulnerable Adults within the context of delivering its services.
- 1.1.6. At the organisational level, we have procedures aimed at preventing, managing risks of, detecting and responding to Harm.
- 1.1.7. Medical personnel may observe signs indicating a possible Child or Vulnerable Adults Safeguarding concern or they may be the first person(s) in whom a Child or a Vulnerable Adult confides information that suggests a Safeguarding concern. It is important that they (and anyone who may encounter Children or Vulnerable Adults) are supported to notice and identify signs indicating a possible Safeguarding concern; know what action to take; and are able to engage in age - and developmentally - appropriate and culturally sensitive conversations with Children or Vulnerable Adults about Safeguarding concerns, including in response to disclosures, without triggering further trauma to the individual.

1.2. Scope

- 1.2.1. This policy applies to all staff and representatives engaged or employed by International SOS, whether in a paid or unpaid capacity, full-time or part-time. For the purposes of this Policy, this includes employees, sub-contractors and their employees, suppliers and their employees, consultants, interns, volunteers, temporary workers, trustees, board members, and others associated with or working on behalf of the organisation and authorised visitors.

1.3. Purpose

- 1.3.1. The purpose of this Policy:
 - (a) Prevent Harm to the Children and Vulnerable Adults we work with, are in contact with or who are affected by our services, programs and operations;

- (b) Ensure that we respond in an effective, appropriate and timely manner to any Child or Vulnerable Adult Safeguarding incidents and concerns; and
- (c) Ensure that any concerns we have about Children's safety, or the safety of Vulnerable Adults, within the communities in which we work are reported via the appropriate mechanisms.

1.4. Definitions

- 1.4.1. **Abuse** encompasses all forms of deliberate ill treatment that result in actual or potential Harm to the individual's safety, well-being, health, survival, development and/or dignity and that takes place in the context of a relationship or responsibility, trust or power. Abuse can consist of a single act or repeated acts. It may be physical, verbal or psychological. It may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which they have not consented and cannot consent, or if an individual is placed in a situation that could endanger their wellbeing regardless of whether it leads to any actual impairment or detrimental outcome.
- 1.4.2. **Child** is any individual under the age of 18 years regardless of the age of adulthood or consent in national legal systems.
- 1.4.3. **Child Protection** is defined as the prevention of and response to all forms of violence, Abuse, neglect and exploitation affecting Children, perpetrated by any person—this could be a family member, a community member, a peer or the Child themselves, engaging in self-Harm.
- 1.4.4. **Harm** is injury, pain, suffering or trauma of a physical, psychological or emotional nature. Harm caused to Children or Vulnerable Adults may be visible or invisible.
- 1.4.5. **Safeguarding** means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. It is fundamental to creating high-quality health and social care. Those most in need are: children, young people and adults whose circumstances make them vulnerable.
- 1.4.6. **Safeguarding of Children and Vulnerable Adults** refers to the sum of measures an organisation takes to promote the wellbeing and protect Children and Vulnerable Adults from any Harm – direct and indirect – arising from their contact with that organisation. This involves identifying, preventing and managing risks of all forms of Harm including, but not limited to, physical, sexual and emotional Abuse; exploitation; neglect and negligent treatment; discrimination; and detecting and responding appropriately to allegations, suspicions and concerns.
- 1.4.7. **Vulnerable Adult Protection** is defined as the prevention of and response to all forms of violence, Abuse, neglect, exploitation and discrimination affecting Vulnerable Adults. This includes Harm perpetrated by caregivers, family members, service providers, community members, peers, or others in positions of trust or authority.

It also encompasses Safeguarding against self-neglect and ensuring that Vulnerable Adults are supported to make informed decisions, exercise autonomy, and access appropriate care and protection measures.

- 1.4.8. **Vulnerable Adult** means a person aged 18 or over who is, or may be, in need of additional care or support by reason of mental or other disability, age, illness, or life circumstances; and who is, or may be, unable to protect themselves from significant Harm, Abuse or exploitation.



2. GUIDING PRINCIPLES

- 2.1. This Policy is informed by the principles derived from the UN Convention on the Rights of the Child and adapted to include Vulnerable Adults:
- (a) **Non-discrimination:** All Children and Vulnerable Adults should enjoy their rights without discrimination of any kind, regardless of their race, colour, sex, language, religion, disability, age, or any other status;
 - (b) **Best interests:** In all actions concerning Children and Vulnerable Adults, their best interests shall be a primary consideration;
 - (c) **Right to survival and development:** Children and Vulnerable Adults have the right to life, survival, and development to the maximum extent possible;
 - (d) **Respect for views and autonomy:** Children who are capable of forming their own views have the right to express those views freely in all matters affecting them, with their views being given due weight according to their age and maturity. Vulnerable Adults should be supported to express their views and make informed decisions, with appropriate consideration given to their capacity and circumstances.
- 2.2. International SOS has a zero-tolerance approach to all forms of Abuse, exploitation, neglect and negligent treatment of Children and Vulnerable Adults. We take a risk-based approach to identifying, mitigating, managing and reducing the risks to Children and Vulnerable Adults that may be associated with our activities and operations.

3. POLICY

3.1. Commitment

- 3.1.1. International SOS recognises that all Children and Vulnerable Adults have a right to be protected, and that staff have a responsibility to protect them from Harm or Abuse when delivering our services.
- 3.1.2. International SOS takes every reasonable step to ensure that Children, young people and Vulnerable Adults are protected where our staff and associates are involved in the delivery of our services. All suspicions and allegations of Abuse are taken seriously and responded to swiftly and appropriately.
- 3.1.3. International SOS enable all our staff and those who work with us to make informed and confident decisions regarding Safeguarding. We expect all staff to have read, understood and to adhere to this policy and related procedures.

3.2. Creating and Maintaining a Child and Vulnerable Adult-safe environment

- 3.2.1. International SOS will:
 - (a) Integrate Safeguarding measures for both Children and Vulnerable Adults throughout our organisational policies, procedures, processes, systems and operations;
 - (b) Create a culture of openness and mutual accountability at all workplaces to enable Safeguarding issues and concerns to be raised and discussed, including those affecting Vulnerable Adults;
 - (c) Prevent from working with Children or Vulnerable Adults any individuals who pose an unacceptable risk to their safety and wellbeing;
 - (d) Deliver our services and implement our activities in a Child-centred and adult-sensitive manner, recognising the specific needs and rights of vulnerable individuals;
 - (e) Comply with all local laws regarding the protection of Children and Vulnerable Adults, except where contractual obligations or international standards impose greater protections, in which case those standards or requirements must be followed.

3.3. Objectives

- 3.3.1. International SOS aims to:
 - (a) have senior managers who are committed to the wellbeing and safety of Children and Vulnerable Adults
 - (b) be clear about staff responsibilities to safeguard and promote the welfare of Children and Vulnerable Adults while delivering International SOS services
 - (c) have procedures for escalating adverse incidents including those relating to Safeguarding.

3.4. Related Policies and Procedures

3.4.1. What to report

- (a) All incidents, allegations, disclosures, suspicions and concerns relating to Child Abuse, exploitation, neglect and negligent treatment in connection with International SOS staff, representatives, services, programs and operations must be reported as per International SOS reporting mechanisms.
- (b) All incidents, allegations, disclosures, suspicions and concerns relating to policy non-compliance or Code of Conduct violations by International SOS staff, representatives, subcontractors or parties working on or in support of an International SOS program, operation, site or clinic must be reported.
- (c) All incidents, allegations, disclosures, suspicions and concerns relating to Abuse, exploitation, neglect and negligent treatment observed by you, or reported to you in your capacity as a staff member, representative, subcontractor or supplier of International SOS, regardless of whether the report or observation directly involves another individual howsoever connected with International SOS.

3.4.2. Recruitment

- (a) Recruitment procedures ensure that all staff are appropriately hired and credentialed.
- (b) For roles that involve contact with or working with Children and/or Vulnerable Adults (see section 1.4: Definitions), additional Safeguarding processes will be applied, which may include:
 - (a) Explicit Safeguarding and values-based interview questions that explore role-relevant knowledge, attitudes, skills and behaviours related to working with Children and Vulnerable Adults;
 - (b) Obtaining at least two verbal references from verified former line managers, including the most recent, regarding the job applicant's Safeguarding knowledge, attitudes, skills and behaviours and their suitability to work with or be in contact with Children and/or Vulnerable Adults;
 - (c) Conducting criminal record checks (including checks relevant to working with Children and Vulnerable Adults) covering the previous five years for every country in which the job applicant has lived for 12 months or longer, plus their country of citizenship;
 - (d) Checking sex offender registries, Child Abuse registries, and Vulnerable Adult protection registries at the local, state and national levels where the job candidate has worked, including against previous names.

3.4.3. Escalation

- (a) There are formal escalation procedures for escalating incidents to the relevant Safeguarding Lead, Safeguarding Advisor, local Legal Counsel, or to Safeguarding@internationalsos.com. You may also report anonymously via the Keep Safe form.

3.4.4. Disciplinary

- (a) In the event of an allegation of Abuse that is proven against staff, International SOS disciplinary procedures are followed, in conjunction with the relevant local authorities if appropriate.
- (b) Where an allegation against an International SOS staff member of Child Abuse, exploitation, neglect or negligent treatment is upheld by a Safeguarding investigation, the matter will be escalated confidentially to the **Regional Human Resources Director** and the **Group General Counsel** for further action which may include disciplinary action, up to and including summary dismissal, and/or referral to authorities for criminal investigation.
- (c) Where the following are determined to have occurred, they will be considered misconduct as they constitute a failure to protect Children or Vulnerable Adults from actual, potential or suspected Harm and will be escalated confidentially to the **Regional Human Resources Director** and the **Group General Counsel** for further action which may include disciplinary action, up to and including summary dismissal, and/or referral to authorities for criminal investigation:
 - 1) Failure by an International SOS staff member to report an incident, suspicion, concern or allegation of Child Abuse, exploitation, neglect or negligent treatment involving an International SOS staff member;
 - 2) Policy non-compliance or Code of Conduct violation by International SOS staff; and
 - 3) Failure by an International SOS staff member to report policy non-compliance and Code of Conduct violation by an International SOS staff member.

3.4.5. Consent

- (a) Staff must be aware of the procedure for obtaining informed consent from the appropriate parent/guardian of a Child or Vulnerable Adult where appropriate.

3.4.6. Local Laws

- (a) International SOS staff must understand and comply with local Safeguarding laws and regulations, and international standards – complying with whichever gives greater rights and protections to Children and Vulnerable Adults.

4. RESPONSIBILITIES

4.1. All Staff

- 4.1.1. Must be familiar with and adhere to International SOS's Safeguarding of Children and Vulnerable Adults Policy, which apply at all times, during and outside of work. This includes an undertaking to:
- (a) Never Abuse, exploit, neglect or negligently treat any Child or Vulnerable Adult;
 - (b) Never use International SOS property to access, view, create, download, distribute or profit from Abuse or exploitation material involving Children or Vulnerable Adults;
 - (c) Never request or accept personal contact details from, nor share personal contact details with, any Child or Vulnerable Adult, or their family members, whom you have come into contact with through your work with International SOS, otherwise than as is reasonably required for official International SOS purposes.
- 4.1.2. Must understand and comply with the laws of the host country, applicable laws of the country of registration (e.g. if a clinician), and international standards—whichever provides greater rights and protection to Children and Vulnerable Adults;
- 4.1.3. Must consider Safeguarding in project planning, supply and implementation to determine potential risks to Children and Vulnerable Adults associated with project activities and operations, and work with local stakeholders, including affected individuals and the Safeguarding Advisor, to apply contextually relevant measures that reduce the risk of Abuse, exploitation, neglect and negligent treatment where reasonably practicable;
- 4.1.4. Must maintain awareness of the behaviours that constitute Abuse, exploitation, neglect and negligent treatment of Children and Vulnerable Adults;
- 4.1.5. Must understand how to respond to disclosures from Children and Vulnerable Adults, and allegations from community members;
- 4.1.6. Must know how to report Safeguarding incidents and concerns, and report immediately any witnessed, suspected, disclosed or alleged incidents of Abuse, exploitation, neglect and negligent treatment of Children or Vulnerable Adults via the designated Safeguarding reporting channels.

4.2. Human Resources

- 4.2.1. The **regional head of HR in each region** shall ensure appropriate recruitment procedures are followed for all new medical staff and appropriate disciplinary action is taken where there are proven allegations of Abuse.

4.3. Medical Team and Senior Managers

- 4.3.1. Individual staff who have contact with Children and Vulnerable Adults must be alert to potential indications of Abuse or neglect and know how to act upon their concern by being aware of the related procedures.
- 4.3.2. Any allegations or concerns of suspected Abuse or Safeguarding issues must be immediately escalated to the Safeguarding Advisor, to Safeguarding@internationalsos.com, or to your manager (if appropriate).

5. DATA PROTECTION

- 5.1. Individual's personal, confidential and/or personally identifiable information may only be collected/accessed by authorised personnel at the explicit direction of International SOS for precise, clear and legitimate International SOS activities, programs and operations and in accordance with applicable privacy laws and the International SOS Privacy Policy. This information must be limited to that which is strictly necessary for the permitted purpose.
- 5.2. Prior to collection of any personal data, age-appropriate free and informed consent must be obtained from the Child or Vulnerable Adult (written, when possible; otherwise, verbal consent) and/or from the Child's or Vulnerable Adult's parents or legal guardians. The Child, Vulnerable Adult and/or their parent or legal guardian must be advised that consent can be withdrawn at any time without affecting their access to services. Informed consent requires that the Child or Vulnerable Adult is provided with an explanation, in the Child's or Vulnerable Adult's primary language and using terminology adapted to the age, development and/or needs of the individual, of why the information is being collected; how it will be used; how it will be stored and for how long; who will have access to it and for what purposes. All collection of personal information must be done in compliance with applicable privacy laws and the International SOS Privacy Policy.
- 5.3. Individual's personal, confidential and/or personally identifiable information must be safely stored in password protected encrypted files and otherwise in accordance with the International SOS Data Protection Policy.
- 5.4. Sharing of Children's or Vulnerable Adult's personal, confidential and/or personally identifiable information is strictly on a "need to know" basis and must be done in accordance with applicable privacy laws and the International SOS Privacy Policy.
- 5.5. Children and Vulnerable Adults have the right to access their own personal data and to request the correction of incorrect personal data in compliance with applicable privacy laws and the International SOS Privacy Policy.

6. REGULAR REVIEW

- 6.1. This Policy is subject to regular review, at least every three years and earlier if needed.

7. ENFORCEMENT AND REPORTING BREACHES

- 7.1. Breaches of this Policy may have serious legal and reputation repercussions and could cause material damage to International SOS. Consequently, breaches can potentially lead to disciplinary action that could include summary dismissal and to legal sanctions, including criminal penalties.
- 7.2. All employees are expected to promptly and fully report any breaches of the Policy. A report may be made to the employees' supervisor or the Group General Counsel. Reports made in good faith by someone who has not breached this Policy will not reflect badly on that person or their career at Intl.SOS. Reports may be made using the following e-mail address: Compliance@internationalsos.com.



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