

Securitas Business Partner Code of Conduct

1 Why a Business Partner Code of Conduct?

At Securitas, we place a strong emphasis on ethics, integrity and compliance. We strive to always conduct our business in a sustainable way and in line with our core values, *Integrity, Vigilance and Helpfulness*. We are committed to maintaining the highest standards of integrity and compliance with applicable laws, rules, regulations and any codes of conduct in the jurisdictions where we operate.

Anti-corruption legislation in certain countries has extra-territorial reach, meaning that it also applies to acts performed outside of the country that enacted the rules. Examples of such legislation are the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. This Business Partner Code of Conduct also seeks to ensure compliance with the principles of these Acts and to preserve the spirit and intent of these Acts in all countries.

The Securitas Group is a signatory of the United Nation's Global Compact and we support and respect the principles set out in the *United Nation's Universal Declaration of Human Rights*, the *International Labour Organization's Declaration on Fundamental Principles and Rights at Work* and *OECD's Guidelines for Multinational Enterprises*. We recognize our responsibility to promote and observe those principles when conducting our global business.

This Business Partner Code of Conduct (the "**Code**") has been created to give our business partners a clear view of the values and principles that underpin all our work. It outlines the minimum standards that Securitas requires its business partners to comply with when doing business with us. The standards set out in this Code are based on internationally recognised treaties and agreements.

2 The Business Partner Code of Conduct applies to all Suppliers, Sub-Contractors and Business Partners of Securitas

This Code applies to all suppliers, sub-contractors, agents and business partners of Securitas (jointly referred to as "**Business Partners**"). For purposes of this Code, business partners will include service partners, consultants, intermediaries and similar parties who represent and/or provide goods or services to Securitas.

Business Partners are required to observe and comply with all applicable laws, regulations and industry standards, as well as the standards set out in this Code. All legally required permits, licenses, approvals and registrations must be in place.

It is the responsibility of each Business Partner to meet the requirements of this Code and to pass on the same or equivalent requirements to its own business partners, employees, officers, directors or



authorized representatives, without exception, for all dealings and transactions involving Securitas. Each Business Partner shall bear the cost associated with fulfilling this Code.

Diligent and consistent compliance with the provisions of the Business Partner Code of Conduct will be considered for selection, retention and evaluation of Business Partners.

In no case shall Business Partners abide to any order, request or instruction that might imply a breach or an infringement of the provisions of this Business Partner Code of Conduct.

If a Business Partner fails to comply with the Code, and the non-compliance is not insignificant, Securitas reserves the right to terminate the agreement and business relationship with the Business Partner, without prejudice to any other rights and remedies available. In the event that non-compliance is identified by the Business Partner, the Business Partner must inform Securitas of this without undue delay.

3 Let Us Know

Business Partners and our employees, directors and representatives must report incidents of non-compliance with this Code. Business Partners shall have adequate grievance mechanisms in place for such reporting and must ensure that concerns may be raised in good faith without the fear of retaliation.

Violations of this Code may also be reported directly to Securitas through the *Securitas Integrity Line* at <https://securitas.integrityline.com/> or via e-mail at integrity@securitas.com.

4 Human Rights, Working Conditions and Health & Safety

Securitas supports and respects the protection of internationally proclaimed human rights and expects the same from our Business Partners. Business Partners shall ensure that they are not complicit in any human rights abuses.

Business Partners are strictly forbidden from employing persons who are below the minimum age for employment, that is, the minimum age according to local laws or the age of completion of compulsory schooling or fifteen years old, whichever is higher. If young workers between the ages 15 and 18 are allowed by local law, they cannot be employed for any unsafe, hazardous or heavy work.

Business Partners are strictly forbidden from engaging in or tolerating modern slavery and exploitation, including forced, coerced, bonded, or compulsory labour and human trafficking. Business Partners cannot engage in or tolerate restrictions of movement, confiscation of identity documents, excessive recruitment fees, debt bondage, withholding of wages, violence, or any other kind of exploitation or abuse.

Business Partners must have written and clear terms and conditions for their employees. Business Partners must comply with applicable laws regarding working hours and rest rules. Business Partners must pay wages and benefits that meet or exceed the legal minimum standards, collective bargaining agreements or appropriate prevailing industry standards, in a timely manner.

Securitas respects the rights of all employees to choose whether to be represented by a trade union for the purpose of collective bargaining and to form and join trade unions or workers' associations of their choice in accordance with local laws and principles, including respecting freedom of peaceful



assembly and association and no employee should risk being harassed or retaliated against for exercising these rights. Securitas expects that our Business Partners do the same.

Business Partners must establish a safe and sound work environment. Business Partners are expected to maintain adequate systems designed to prevent work related injuries and illnesses and their employees should receive appropriate health and safety training, instructions and equipment.

Securitas is an equal opportunity employer and all employees are to be treated and treat others fairly and equally, without any type of discrimination or form of harassment. Securitas expects that our Business Partners promote diversity and equal opportunity and uphold the elimination of discrimination in employment and occupation.

5 Business Ethics

Securitas insists on honesty, integrity and fairness and we are strongly committed to upholding and promoting the highest ethical business standards in all aspects of our business. All Business Partners are expected to conduct their business with honesty and integrity and not participate in any unfair dealings and practices, including anti-competitive conduct.

Securitas has zero tolerance for all forms of bribery and corruption. Business Partners must not seek, accept or retain business advantages based on illegal, improper or unethical behaviour. This also applies to Business Partners acting for or on behalf of Securitas.

Business Partners are required not to accept any kind of corrupt practices or payments and are expected to maintain an adequate system for the prevention of corruption, including a written anti-corruption policy, which reflects at least the undertakings of this Code.

Business Partners shall not provide any gifts, trips, meals or entertainment to a Securitas' employee or any third party in any situation in which it might influence, or appear to influence, any employee or third party's decisions in relation to the Business Partner. It is not necessary that the benefit is given or offered directly to the person exercising the power. It may also be given or offered to an intermediary or a family member. To the extent the circumstances merit, Business Partners may provide modest gifts, meals, or entertainment to Securitas's employees if this does not violate any law and they are not cash or cash equivalents, frequent or expensive and they are consistent with customary business practice. Business Partners will accurately reflect any such gifts, meals or entertainment in their books and records.

Although corruption can occur in any business dealings (including with private companies and individuals) the risk of corruption is particularly acute when dealing with government officials¹. In the context of government officials, an offence will be committed if a bribe is offered to a government official to gain a business advantage even if the official does not act improperly. Therefore, particular care should be taken when dealing with government or public entity officials.

¹ Government officials are officials who hold positions in any central, regional or local government departments, ministries, judiciary, or in partly/ fully state-owned or funded agencies/organizations and public institutions. Examples of government officials are politicians, ministers, staff of United States Department of Homeland Security or any country's Interior/ Home ministry staff, customs officials, and employees of tax authorities etc. Employees in state owned (partly or fully) organizations are also considered to be Government officials.



Business Partners shall not participate in, facilitate or support money laundering and terrorist financing.

Business Partners shall establish systems to prevent competition law violations and must not participate in any bid rigging, price fixing, cartel activity or other anti-competitive activities.

Business Partners are required to comply with applicable trade sanctions regulations, including those published by the United Nations, the United States, and the European Union.

Business Partners must protect the privacy of employees, representatives of customers, business partner representatives and other individuals, and process personal data lawfully, fairly and transparently.

Business Partners are required to prevent situations where there is an actual or potential conflict of interest between Securitas and the Business Partner, or a closely related party, and disclose such situations to Securitas.

Business Partners shall protect Securitas' confidential information and intellectual property rights and must keep confidential all the information to which they have access in the performance of their work, services or supply of goods to Securitas, even if such information is not classified or not specifically about Securitas and act to prevent its misuse, theft, fraud, or improper disclosure. If Business Partners are aware of material, non-public information relating to Securitas or its business, they may not purchase, sell or otherwise trade in securities of Securitas or any company that trades with Securitas or engage in any other action to take advantage of that information

Accurate, reliable information and records are critical for Securitas' to meet its financial, legal, and management obligations and they are necessary to fairly reflect Securitas' transactions. Business Partner must keep accurate records of all matters related to the Business Partner's business with Securitas. This includes the proper, prompt and complete recording of all expenses and payments and the availability of supporting evidence and documentation.

6 Environmental Sustainability

Securitas strives to conduct business in a sustainable way with respect and consideration for the environment and we should also work in a way that contributes to a more sustainable future.

Business Partners must ensure that they comply with all applicable environmental laws and regulations and expects Business Partners to take a precautionary approach to environmental challenges by undertaking initiatives to promote greater environmental responsibility and by the development and diffusion of environmentally friendly technologies, to the best of their abilities.

7 Compliance with Laws

Business Partners are responsible for ensuring that their directors, officers, employees and subcontractors, representatives and agents understand and comply with applicable regulations and conventions, as well as regional and national legislation, to the extent applicable to the relevant agreement or commercial relationship.



8 Implementation and Monitoring

This Code is part of Securitas' agreement with the individual Business Partner. The individual Business Partner shall sign the attached Commitment Letter to confirm its compliance with this Code, [Exhibit 1](#).

Securitas reserves the right to make periodic information requests of Business Partners, including inspections and/or audits – with or without support of a third party – of facilities, operations and relevant books and records, to substantiate Business Partners' compliance with the Code. Securitas shall strive to give reasonable notice prior to such information requests. Business Partners are not obliged to disclose information which is subject to confidentiality due to applicable laws and regulations or under contract. Information requests, including inspections and/or audits, shall be subject to proper confidentiality undertakings.



Securitas Business Partner Code of Conduct - Commitment Letter

The undersigned is a Business Partner to Securitas (as defined by the Securitas Business Partner Code of Conduct).

1. By signing this document, we acknowledge and agree that:
 - a. the Code outlines Securitas' minimum expectations of Securitas' Business Partners (including our organisation) in relation to:
 - i) human rights, working conditions and health & safety,
 - ii) business ethics,
 - iii) environmental sustainability, and
 - iv) compliance with laws,
 - b. the Code may be amended or updated by Securitas from time to time (such amendments will apply generally for all Business Partners and will be provided, if possible, with reasonable notice), and
 - c. the Code includes an ongoing expectation that Business Partners (including our organisation) will inform Securitas of any concerns or incidents in relation to the content of this Business Partner Code of Conduct.

2. On behalf of my organisation:
 - a. I confirm that Securitas' expectations as set out in the Code are understood;
 - b. I provide the commitment that we will uphold the principles of the Code, as amended from time to time, in our policies, our procedures and our day-to-day practices; and
 - c. I acknowledge and agree that the Code, as amended from time to time, forms part of our contractual terms with Securitas (but will not reduce, alter or supersede any other obligations which may be imposed by any applicable contract, law, regulation or otherwise).

Date:

Organisation:

Signature:

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Name:

Position: