

Business Code of Ethics for Suppliers

Garda Sikring Group

Policy Owner:

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Policy Version: 1.2

This Policy will be reviewed and updated annually.

Foreword

“ At Garda Sikring Group, we are proud to contribute to securing society and assets by executing critically important projects for public and private clients across the Nordics and beyond. We have a long-standing commitment to operating to the highest standards of corporate conduct.

Environmental, Social and Governance (ESG) is highly prioritised in our value chain through policies, business relationships and development. Importantly, this approach covers both our own business operations and our wider supply chain.

Worldwide, we work with thousands of suppliers of direct materials (such as steel, packaging, and plastic), indirect materials (such as machinery and transportation) and services (such as IT consultancy).

While this Business Code of Ethics for Suppliers sets out the minimum standards we expect of our suppliers, we also encourage them to strive for continuous improvement within their own operations and supply chains.

We recognise the different circumstances and challenges our suppliers face and believe by working together we can raise standards, drive sustainable practices, and create shared value for all.”

Jon Ola Stokke, CEO Garda Sikring Group, October 2023



Table of contents

Introduction	3
1. Ethical business commitment and fair competition	3
2. Employment is freely chosen by employees	3
3. Freedom of association and the right to collective bargaining are respected	3
4. Working conditions are safe and hygienic	4
5. Payment of minimum wages	4
5. Conflict of interest	4
7. Working hours are not excessive	4
8. No discrimination is practised	4
9. Regular employment is provided	5
10. No harsh or inhumane treatment is allowed	5
11. Environment protection	5
12. Sanctions	5
13. Documentation	6
14. Right of access	6
15. Right to control at the place of production	6
16. Reaction to violation	6
17. Feedback and continuous improvement	6
Declaration of Code of Ethics for Suppliers	7
Appendix 1 – The ten principles of UNGC	8

The provisions of this code constitute minimum and not maximum standards. Where the provisions of law and this code address the same subject, the provision shall be applied which affords the greater protection.

Introduction

This Code of Ethics for Suppliers is globally valid and applies to Secure HoldCo AS and its subsidiary companies (“Garda Sikring Group” or “the Company”). It is publicly disposed and incorporated in Garda Sikring Group routines and clearly communicated internally and externally.

The ethical principles contained in this document describe the principles of Garda Sikring Group and its affiliates for responsible acting regarding ethics, working conditions, health and safety as well as environment. The ethical principles are in accordance with 10 Principles of the United Nations Global Compact (see appendix 1).

The document forms an integral part of the agreements between Garda Sikring Group and its suppliers. Garda Sikring Group expects its suppliers to comply with these principles and promote the same standards throughout their own supply chains.

1. Ethical business commitment and fair competition

a) The suppliers will adhere to all applicable local, national and supra-national laws and regulations. In countries, or in specific situations where there is no law or regulation governing a particular activity or operation, Garda Sikring Group expects its suppliers to conduct their operations consistent with the principles of this Policy. Garda Sikring Group shall be entitled to verify in a suitable manner whether its suppliers comply with these principles.

b) The suppliers will never, directly or through intermediaries, offer, promise or make any understandings about any personal or improper advantage in order to obtain or retain a business or other advantage from Garda Sikring Group or a third party, whether public or private.

c) In the course of making business decisions or carrying out their job responsibilities, the supplier’s employees shall avoid conflicts of interests between personal interests and the interests of the business and its business objectives.

d) The suppliers are committed to the principles of lawful and free competition under observation of the relevant national and international legislation.

e) The supplier adopts a zero-tolerance approach to fraud, bribery and corruption and is committed to acting professionally, fairly and with integrity in all business dealings and relationships wherever it operates. For more information on anti-bribery and corruption, see the Company’s *Fraud, Anti-Bribery and Corruption Policy*.

2. Employment is freely chosen by employees

a) There is no forced, bonded or involuntary prison labour.

b) Workers are not required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable time.

3. Freedom of association and the right to collective bargaining are respected

a) Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

b) The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

c) Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

d) Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates and does not hinder the development of parallel means for independent and free association and bargaining.

4. Working conditions are safe and hygienic

a) A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of associated with or occurring in the course of work, by minimizing, so far as it is reasonably practicable, the causes of hazards inherent in the working environment.

b) Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

c) Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

d) Accommodation, where provided, shall be clean, safe and meet the basic needs of the workers.

5. Child labour shall not be used

a) There shall be no use of child labour.

b) Young persons under 18 shall not be employed at night or in hazardous conditions.

c) The supplier shall observe the relevant International Labour Organisation standards.

6. Payment of minimum wages

a) Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event, wages should always be high enough to meet basic needs and to provide some discretionary income.

b) All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

c) Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

7. Working hours are not excessive

a) Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.

b) In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7-day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

8. No discrimination is practiced

a) There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

9. Regular employment is provided

a) To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

b) Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, subcontracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

10. No harsh or inhumane treatment is allowed

a) Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

b) The supplier are expected to commit to and respect the protection of internationally proclaimed human rights, in particular ILO's Human Rights Guidelines.

c) The suppliers shall not be complicit in human rights abuses.

11. Environment protection

a) The suppliers shall run their business in a way which, at a minimum, protects and preserves the environment. This includes amongst others the maintenance of natural resources, the avoidance of the use of dangerous or hazardous substances to the extent possible and a responsible handling of wastes.

b) The suppliers shall in particular comply with all applicable national and international environmental legislations and obtain all necessary environmental permits to run their business.

12. Sanctions

a) The supplier shall ensure they conduct their business in compliance with all lawful international sanctions regimes. As such, suppliers must:

- Fully comply with all lawful sanctions regimes affecting their business.
- Implement effective internal controls to minimise the risk of any non-compliance with relevant sanction regimes, including training and support for their employees and contract workers.

13. Documentation

a) The supplier is obliged to comply with the requirements and expectations that emerge from this Business Code of Ethics for Suppliers. Garda Sikring Group can require this work to be documented within a reasonable time on one or more occasions of the following ways:

- Self-declaration from the supplier
- Explanation of where goods are produced
- Follow-up calls with Garda Sikring Group
- Own or independent third-party control of the working conditions at the production site

b) Garda Sikring Group may at any time require documentation to be provided or check whether the requirements are met fulfilled.

14. Right of access

a) Garda Sikring Group must have access to all necessary systems, including finances, pay and working conditions. The right of access includes, among other things, audit and verification, interviews, inspection, control and document review.

b) The supplier must provide reasonable assistance free of charge for such inspection for 3 years after the last payment found place.

c) The supplier must ensure that Garda Sikring Group has a corresponding right of access to the supplier's premises subcontractors.

15. Right to control the place of production

a) Garda Sikring Group reserves the right to carry out notified or unannounced checks on production site at the supplier and/or subcontractor during the contract period.

16. Reaction to Violation

a) Breach of this Code of Ethics for Suppliers constitutes a breach of contract which can cause reactions.

b) Violations of ethical guidelines must be corrected. The supplier is obliged to make corrections at his own expense and/or order a subcontractor to make such corrections, within a reasonable period set by Garda Sikring Group. Done rectification must be documented in writing and rectification of the breach is not considered to have taken place before that the necessary documentation is available

c) In the event of a breach, Garda Sikring Group can also order the supplier to stop all deliveries and work. Garda Sikring Group direct financial loss caused by such an outage, as well as the supplier's costs, are covered the supplier.

d) In the event of a significant breach of ethical guidelines, Garda Sikring Group can terminate the contract immediately effect. Repeated breaches will always be considered a material breach of contract. The same goes for if the supplier fails to correct

17. Feedback and continuous improvement

a) Garda Sikring Group encourage the stakeholders to provide feedback on challenges and successes they face in upholding the principles of this Code of Ethics. This should be addressed with the immediate contact person in Garda Sikring Group.

b) The purpose of feedback is so that Garda Sikring Group can work with suppliers to support them in adhering to the code.

Declaration of Code of Ethics for Suppliers

Name of the Company: _____

Date/Place: _____

Full Name: _____

Signature: _____

Appendix 1 – The ten principles of UNGC

Corporate sustainability starts with a company's value system and a principles-based approach to doing business. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption. Responsible businesses enact the same values and principles wherever they have a presence and know that good practices in one area do not offset harm in another. By incorporating the Ten Principles of the UN Global Compact into strategies, policies and procedures, and establishing a culture of integrity, companies are not only upholding their basic responsibilities to people and planet, but also setting the stage for long-term success.

The Ten Principles of the United Nations Global Compact are derived from: the Universal Declaration of Human Rights, the [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#), the [Rio Declaration on Environment and Development](#), and the [United Nations Convention Against Corruption](#).

Human Rights

[Principle 1](#): Businesses should support and respect the protection of internationally proclaimed human rights; and

[Principle 2](#): make sure that they are not complicit in human rights abuses.

Labour

[Principle 3](#): Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

[Principle 4](#): the elimination of all forms of forced and compulsory labour;

[Principle 5](#): the effective abolition of child labour; and

[Principle 6](#): the elimination of discrimination in respect of employment and occupation.

Environment

[Principle 7](#): Businesses should support a precautionary approach to environmental challenges;

[Principle 8](#): undertake initiatives to promote greater environmental responsibility; and

[Principle 9](#): encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

[Principle 10](#): Businesses should work against corruption in all its forms, including extortion and bribery.