

# ESG-Policy

**Garda Sikring Group**

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This Policy will be reviewed and updated annually.

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# Introduction

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Secure HoldCo AS and its subsidiary companies (“Garda Sikring Group” or “the Company”) believes that Environmental, Social, and Governance (ESG) principles are crucial to developing resilient companies and operations that deliver long-term value for our investors. We are committed to integrating ESG into our sub entities and operating philosophy. This ESG Policy outlines our firm-wide approach to integrating ESG in our businesses and are intended to provide a framework for how the Group consider our impact through how we operate our business and how we engage with the communities. Garda Sikring Group takes into account ESG considerations at the Group level, manager level, and sub-entity level.

## Policy Scope & Application

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This ESG Policy is globally valid and applies to all entities of Secure HoldCo AS (“Garda Sikring Group” or “the Company”). The commitments, rules and procedures set out in this Policy apply to the activities of all entities of the Group. It is publicly disposed and incorporated in Garda Sikring Group routines and clearly communicated internally and externally.

The application of the Policy will take into consideration and align with the relevant ESG requirements of Garda Sikring Group’s customers, regulators, and investors as well as the views and interests of its employees, and wider stakeholder community groups such as suppliers and NGOs.

## Policy Purpose

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The purpose of this Policy is to describe the management commitment to sustainability in all our operations. In this Policy, the term sustainability should be understood from a holistic perspective, including environmental, social and economic aspects. Due to the broad topic, responsibility lays with several functions within the organisation (as stated in chapter “Roles and Responsibilities”) and forms an integral part of the Group Management System.

Sustainability is closely integrated in Group’s business strategy, values and culture. Therefore, this Policy is complemented by other steering documents. The relevant documents are listed within each topic in chapter “Overview of our Commitments”.

## Business Purpose

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The Group strives to be the leading actor within physical security. The social purpose of the Company is to provide products and solutions that will facilitate security and safety in the society including freedom of speech, democracy, social inclusion and road safety. Our business purpose positively contribute to the UN Sustainable Development Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable.



## ESG Standards

The Group is committed to complying with all national laws and regulations in the jurisdictions in which it operates and will seek to follow ESG best practice in our industry (seeking specialist third party advice where necessary). We also commit to upholding the 10 Principles of the United Nations Global Compact (see appendix 1) in our own business and those we do business with. We collect inspiration and guidance from relevant initiatives and frameworks, including: the UN Sustainable Development Goals (SDGs), the OECD guidelines for multinational companies, ILO's Human Rights Guidelines, and Principles for Responsible Investment (PRI).

We recognise that we must integrate our values into the daily management of the business to meet the expectations of stakeholders who include customers, employees, regulators, investors, suppliers, the community, and the environment. We also recognise that high ESG standards and a commitment to continuous improvement can help capture opportunities and avoid risks that occur at the intersection of sustainability and commerciality.

We recognise that our responsibilities to our stakeholders are important to our success. We aim to demonstrate these responsibilities through our actions and within our corporate policies.

## Risk & Opportunity Identification

Our sustainability program and reporting framework is based on the ESG-related risks and opportunities deemed "most material" to the Group. Across our value chain, we have identified priority ESG topics that we believe can most affect our ability to develop our companies of enduring value. This identification has been conducted through a double materiality analysis. Our assessment takes into account double materiality which acknowledges a company should report simultaneously on sustainability matters that: 1) are financially material in influencing business value and 2) could negatively or positively impact the environment and/or stakeholders.

We commit to reviewing our ESG risks and opportunities annually to ensure they remain relevant, and we will integration key aspects into the company's overall risk management.

The double materiality analysis resulted in four priorities ESG topics:

ESG topic	European Sustainable Reporting Standard
Climate-friendly operations	E1: Climate Change
Efficient use of resources	E5: Resource use and circular economy
Enjoyment, Equity and Inclusion	S1: Own workforce
Human rights, safety and working conditions	S2: Workers in the value chain
	S4: Consumer and end-user

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## Continuous Improvement

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The Group management commits to ensuring continuous performance improvement on key strategic focus areas to create value for both our business and our stakeholders. In addition, more detailed action plans are available for different topics/areas mentioned in this policy.

## Monitoring and Reporting

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Each commitment made within this Policy document is integrated into our sustainability roadmap. A timeline for implementation and a budget for completion will be agreed by the Board as part of the annual budget process.

Those aspects that can be monitored using quantitative measures / metrics are assigned appropriate Key Performance Indicators for performance measurement and monitoring. Performance against progress will be monitored and communicated to the Board (at least bi-annually), in top management meetings and staff meetings. We also commit to annually reporting our progress to external stakeholders through our Sustainable Business Report.

We are obligated to produce specific information for CSRD, ESRS, CSDDD, CBAM, the Norwegian Transparency Act, the Norwegian Activity Duty and the Duty to Issue a Statement and respond to our investor's ESG-related data requests.

We are committed to being transparent with our investors, shareholders, and other stakeholders about Garda Sikring Group's ESG initiatives, actions, and goals. Our ESG report provides updates regarding our ESG program firm-wide on an annual basis, and we provide periodic ESG updates on board meetings. We value regular, frequent engagement with our stakeholders on ESG matters.

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## Roles and responsibilities

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The Garda Síking Group Board has overall ownership and oversight of this Policy and for all sustainability and ESG matters. The responsibility for the implementation of this Policy and the achievement of its objectives rests with the Chief Executive Officer.

The Group's Board of Directors and Group Executive Management shall incorporate sustainability topics into the overall decision process. Sustainability initiatives shall also be integrated into existing staff functions, ensuring their execution. Each Head of entity is responsible for promoting the Group's sustainability approach in their operations and in all their assignments.

The Director of Sustainability is the document owner of this Group Policy and is responsible for maintaining and updating this Group Policy, as well as ensuring that it is properly published. The Policy will be reviewed by the Board annually to reflect how the Group's approach evolves over time and to take into account the growth and new acquisitions in the Group.

Entity Management is responsible for communicating and implementing this ESG Policy, and for ensuring that all employees within their area of responsibility are familiar with and follow this Policy.

All associates are responsible to follow this Policy and related procedures. Employees are encouraged to ask questions and discuss compliance to this Policy with their managers and relevant support functions. As an employee, you are required to complete the mandatory sustainability e-learning.

# Overview of our Commitments

## Governance

Garda Sikring Group will seek to ensure that its corporate governance arrangements comply with mandatory statutory standards and operate in accordance with the regulatory bodies with jurisdiction over the relevant businesses. It will also operate in accordance with internal policies relating to anti money-laundering, anti-bribery and corruption, and conflicts of interest.

## Business ethics

### Overarching Commitment

To be the leading actor within technical and physical security – 360 degree security, the highest possible level of professionalism is needed in all our endeavours. Business ethics is an expression of the professionalism the Group displays throughout its operations and expects of its directors, officers, employees and others with whom we interact.

The overarching commitment to business ethics are the following:

- Ethical and legal behaviour
- Fair, courteous, and respectful treatment of fellow employees and others with whom we interact
- Fair and appropriate consideration of the interests of other stakeholders (customers, other commercial partners, government authorities and the public) and of the environment
- Professionalism and good business practice

### Goals and Targets

- 100% compliance with our Code of Conduct
- 100% employees signing Code of Conduct
- 100% employee training in Policies

### RELEVANT POLICIES

Employee Code of Conduct

Business Code of Ethics for Suppliers

Fraud, Anti-Bribery and Corruption

Cybersecurity and Information Security

## Fraud, Anti-bribery, Corruption and Anti-money laundering

### Overarching Commitment

The Group is committed to conducting all their business in an honest and ethical manner. It is committed to operating a framework for the prevention and detection of fraud, bribery, corruption, money laundering and terrorist financing and a robust process to be followed in the event that these are suspected. We adopt a zero-tolerance approach to fraud, bribery, corruption, money laundering and terrorist financing and are committed to acting professionally, fairly and with integrity in all business dealings and relationships wherever it operates.

We have strict anti-bribery and anti-money laundering policies in place which are required to be signed by all employees when on-boarding any of the sub-entities. In addition, we require our suppliers to sign our strict Business Code of Ethics for Suppliers that addresses these issues, as well as a Supplier's Declaration that addresses the EU sanctions against Russia. We also commit to delivering training to our employees and to undertaking Anti-Bribery and Corruption, Anti-money laundering, and due diligence on our Suppliers.

### Goals and Targets

- 100% tier 1 sign Business Code of Ethics for Suppliers
- 100% employee training in Fraud, Anti-Bribery and Corruption Policy

### RELEVANT POLICIES

AML Policy

Fraud, Anti-Bribery and Corruption Policy

Business Code of Ethics for Suppliers



## Whistleblowing

### Overarching Commitment

We are committed to conducting business with honesty and integrity, and we expect all Group employees to maintain the same high standards. Our policy and process is designed to ensure that employees can raise their concerns about wrongdoing or malpractice within the Group without fear of victimisation, subsequent discrimination, dis-advantage or dismissal.

Our overarching commitment is to encourage colleagues to raise serious concerns at the earliest opportunity, provide colleagues with guidance as to how to raise those concerns and reassure colleagues that they can raise concerns without fear of reprisals, even if they turn out to be mistaken.

### Goals and Targets

- 100% employee knowledge on Whistleblowing Policies and routines

### RELEVANT POLICIES

Whistleblowing policy

## Cybersecurity and Information Privacy Protection

### Overarching Commitment

The confidentiality, integrity and availability of information, in all its forms, are critical to the on-going function and good governance of the Group. Failure to adequately secure information increases the risk of financial and reputational losses. Prevention is far better than cure.

Our overarching commitment is to:

- Ensure that employees are aware of and comply with all current and relevant legislation;
- Ensure that employees understand their own responsibilities for protection the confidentiality, integrity and availability of data they handle; and
- Protect the Company for liability or damage through the misuse of its IT facilities.

### Goals and Targets

- 100% employee training on Data Privacy and Cybersecurity

### RELEVANT POLICIES

Data Privacy Policy

Cybersecurity Policy

IT-User Policy

## Sustainable Procurement

### Overarching Commitment

The Group is aware of its responsibilities regarding ethics, social considerations, economy, as well as environment, in the supply chain and through procurement. Purchasing activities have a fundamental role in minimising environmental impact and managing risks. Our investment decisions delivered through the purchasing process must establish resilient infrastructure and supply chains to both mitigate and adapt to climate change. Further, economic, environmental, and social objectives in purchasing activities cannot be viewed in isolation.

It is the Group policy to conserve and protect the environment, and Garda Síkring Group will continue to implement those actions whenever possible and economically feasible. In practice, the objective is to purchase products that have reduced environmental impact through the way they are made, transported, stored, packed, used and disposed.

Our overarching commitment is to:

- Purchase goods and services that deliver long-term value for the Company and its stakeholders,
- Select goods manufactured, delivered, used, and disposed of in an environmentally and socially responsible manner, and
- Model sustainable environmental and social purchasing to our community of consumers and vendors.

### Goals and Targets

- 100% compliance with Purchase Policy
- 100% buy-back on all IT-supplies

### RELEVANT POLICIES

Business Code of Ethics for Suppliers

Purchase Policy

Transparency Act Policy

Risk Management Policy

## Supply Chain Control

### Overarching Commitment

Garda Sikring Group is committed to conduct all their business in an honest and ethical manner, including promoting fundamental human rights, decent working conditions and lower GHG emissions in the transactions between the Group and its suppliers. Further, ensuring the stakeholders has access to information about how the Group handle negative consequences of such conditions.

The Group has developed routines and policies to promote the Norwegian Transparency Act and the upcoming Corporate Sustainable Due Diligence Directive (CSDDD) from EU, these are founded on a risk-based approach. In addition, the Group has developed routines for supply chain controls when negotiating and choosing the corrects suppliers for the Group.

Our overarching commitment is to:

- Have supply chain risks fully mitigated and actively contribute to sustainable development,
- Have collaborative efforts and partnerships in place to support stakeholders in the supply chain, both to improve sustainability performance and to raise the bar in the wider industry,
- Proactively take up innovative and far-reaching initiatives to tackle supply chain issues and improve the industry standard (i.e. on packaging, living wage, sustainable transport), and
- Have full supply chain transparency with the ability to trace products from source to consumer (i.e. farm-to-fork strategy).

### Goals and Targets

- Achieve 100% transparency of tier 1 suppliers
- 100% tier 1 sign Business Code of Ethics for Suppliers
- Achieve low social and environmental risks on all suppliers

### RELEVANT POLICIES

Business Code of Ethics for Suppliers

Purchase Policy

Transparency Act Policy

Risk Management Policy

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# Environment

Garda Sikring Group will comply with all applicable laws relating to the environment and climate change as administered by environmental and health protection agencies, local authorities, energy regulators and other relevant regulatory bodies. It will also take appropriate steps to avoid or mitigate the environmental impacts on sustainability factors such as climate change, air quality and biodiversity.

The Group is committed to growing the business in a manner which requires balancing good stewardship in the protection of human health and the natural environment with the need for profitable growth of its operations. In recognition of this, the Group and its companies have adopted a proactive environmental protection policy that states and accounts for its potential adverse impacts on the environment.

The basic principles to achieving this environmental objective are:

- Carry out sound operational and management practices to ensure facilities are in compliance with all applicable legislation providing for the protection of the environment, employees and the public.
- Maintain an active self-monitoring program to ensure compliance with government and company policy.
- Continue to assess available technology to reduce environmental impacts and implement improvements beyond compliance levels where economically viable.
- In the absence of legislation, to apply cost-effective management practices to advance environmental protection and to minimise environmental risk.
- Improve communications and work proactively with government, employees and the public to promote awareness and develop fair, economically viable, realistic laws to protect the environment.
- Where appropriate, encourage and participate in cooperative research for new, better, cost-effective solutions to environmental obstacles.
- Continually update the Board of Directors and report annually to investors, regulators and the public on the Company's performance in carrying out its environmental responsibilities and programs during the year.

## Carbon Footprint Management

### Overarching Commitment

The Group acknowledges the impact our operations has on the climate and our emissions in our value chain. Garda Síking Group generally provide products of steel – a raw material and industry known with high carbon footprint. Our overarching commitment is to become net-zero in our operations by 2050 and join the Paris campaign on 1,5-degree temperature.

Our overarching commitment is to:

- Net-zero emissions achieved for Scope 1 and 2
- Year-on-year progress realised on Scope 3 emissions of at least 2.5% linear annual reduction rate (in line with SBTi)
- Total energy consumption reduced to absolute minimum
- Net-zero carbon footprint (business travel reduced to absolute minimum)

### Goals and Targets

- Validate Science Based Targets through SBTi
- Improve operational efficiencies through minimising GHG emissions
- Source 100% renewable energy in all entities

### RELEVANT POLICIES

Purchasing Policy

Business Travel Policy



## Climate Change Risks & Opportunities

### Overarching Commitment

It is the policy of the Group to prepare and respond to the impacts of climate change (mitigate, adapt, capitalise) with regards to market dynamics and physical disruption. In addition, the Group aims to identify climate change opportunities for business development and market opportunities.

Our overarching commitment is to implement clear quantitative reduction measures realised to minimise risk score, as well as identify several climate opportunities and embed these in the strategy and business model.

### RELEVANT POLICIES

Risk Management Policy

Transparency Act Policy

## Use of Resources and Circular Economy

### Overarching Commitment

The Group is committed to securing and contributing to the regenerative production of renewable resources, as well as regeneration of ecosystems transitioning away from extraction of virgin non-renewable resources.

Our overarching commitment is to push the circularity standards in the industry, e.g. by taking back large volumes of products at end-of-life, and collaboration throughout the value chain, ensure our product strategy aligned to become part of a circular economy, e.g. by obtaining relevant certifications, and ensure that circular business model/product is a key revenue driver of the business.

### Goals and Targets

- Implement 'As-a-Service'-model
- Include ESG-considerations in product design phase

### RELEVANT POLICIES

Purchasing Policy and Guidelines

# Social

Garda Síochána Group will adhere to all applicable laws relating to employment, health & safety, human rights, labour standards, and public safety. We commit to respecting human rights as defined in the UNGC 10 principles (see appendices) and OECD guidelines.

## Employee Engagement & Well-Being

### Overarching Commitment

It is the policy of the Group to respect and care for our employees and recognise their value as individuals. The interaction between managers and employees must be characterised by openness, trust and compliance. Managers and employees must take a joint responsibility for acting fairly, morally correct and sincere.

Our overarching commitment is to have a working environment characterised by well-being, commitment and positive attitudes. We must create a safe and predictable working place and ensure that our employees has the necessary competence to solve their tasks, as well as sufficient resources are made available in the way that these tasks can be solved in a responsible way. We shall create a meaningful and varied everyday life and pride in the workplace by acting with responsibility and a willingness to implement.

### Goals and Targets

- Employee satisfaction results are in the highest quartiles for >5 years. Employees have evaluation discussions twice a year based on their development needs and self-assessments
- Well-being is a main agenda item in board meetings and monitored continuously. A wide range of offerings are in place (e.g. coaching, healthy food, team events etc.)
- Turnover and absenteeism rates are below industry average for >5 years
- L&D budget in place that >85% of employees use annually

### RELEVANT POLICIES

Employee Code of Conduct

Personnel Handbook

## Employee Health & Safety

### Relevance & Overarching Commitment

Safety and openness are fundamental Group values which must be respected and upheld. The Group's overarching commitment is to ensure decent working conditions and provide a healthy and safe working environment free from accidents and work-related illness at our offices, at client's offices, in the field, in business travel and at project sites. This also includes a safe and healthy workplace from a physical, emotional, and mental well-being perspective.

The Group shall provide and maintain equipment and places of work that are safe and without risk to health, provide as necessary, information, instruction, training and supervision that is required to ensure health and safety at work of its employees, as well as encourage staff to set high standard of safety, and to foster an attitude of mind which accepts good safety practice as normal.

### Goals and Targets

- Best-in-class H&S management system and practices in place. H&S certifications available, such as ISO 45001 and OHSAS 18001, and QHSE manager takes overall responsibility for topic
- Accidents are continuously monitored in all categories, and results are significantly below industry benchmarks for >3 years. Absenteeism and turnover rates are significantly below industry benchmark for >3 years.
- Year-on-Year reduction of risks identified in audits due to successful improvement plans

### RELEVANT POLICIES

Health & Safety Policy

Quality Policy

Risk Management Policy

Business Travel Policy

## Diversity, Equity & Inclusion (DEI)

### Relevance & Overarching Commitment

Garda Group is dedicated to fostering a diverse and inclusive workplace that reflects the richness of human differences. We will work towards achieving diversity at all levels of our organisation and promoting equal opportunities for all.

Our overarching commitment is:

- Our DEI performance is considered industry leading, with DEI integrated into every stage of the employee lifecycle and performance regularly reviewed
- Our workforce experiences equal opportunities and the elimination of institutional biases (including wage gap), and can be considered diverse across multiple characteristics at all levels (e.g. employees, management, board)
- Our company actively positions itself as a DEI leader to external stakeholders and its talent pool (e.g. by signing up to industry initiatives, hosting DEI related events)

### Goals and Targets

- Increase woman on board level
- Increase woman on management level
- Celebrating events for under-represented employees
- 100% employee training on DEI

### RELEVANT POLICIES

Health & Safety Policy

Quality Policy

Risk Management Policy

# Appendix 1 - UNGC

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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.