

Employee Code of Conduct

Garda Síkring Group

Policy Owner:

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This Policy will be reviewed and updated annually.

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Introduction

Garda Sikring Group strives to be a leader within technical and physical security – 360 degree security. To achieve this, the highest possible level of professionalism is needed in all its endeavours. This Code of Conduct is an expression of the professionalism the Group strives for throughout its business, and of the professionalism the Group expects of its directors, officers and employees (sometimes collectively referred to as “associates” below).

Scope

This Employee Code of Conduct is globally valid and applies to all legal entities of Secure HoldCo AS and its subsidiary companies (hereby referred to as “Garda Sikring Group” or “the Company”). It is publicly disposed and incorporated in Garda Sikring Group routines and clearly communicated internally and externally.

All associates of Garda Sikring Group are expected to follow the law and adhere to high ethical standards. They should demonstrate social and environmental responsibility, professionalism, and use good business practice in performing their jobs. Specifically, we aim to uphold the United Nations Global Compact Principles which encompass human rights, labour standards, environment and anti-bribery & corruption.

Security and openness are fundamental Garda Sikring Group values which must be respected and upheld. Associates shall use good judgement and common sense in all situations when the requirement of the law or of good business practices appears unclear. Employees should seek advice and direction from their supervisor in such situations.

We expect the same ethical conduct across our value chain, please see *Business Code of Ethics for Suppliers*.

The principles contained within the Employee Code of Conduct are based on the following principles which align with the United Nations Global Compact principles:

- 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

Any violation of this Employee Code of Conduct is considered as misconduct and will be addressed accordingly.

1. Compliance with the law

Garda Sikring Group is committed to operating within the framework of the laws, rules and regulations applicable to its business. Compliance with the law is an absolute requirement for Garda Sikring Group and its employees.

All employees are expected to understand and adhere to the laws, regulations and binding standards affecting their work and must not encourage other employees or persons with whom Garda Sikring Group does business to breach the law.

Management is expected to provide necessary instruction and advice. On occasion, there may be disagreement as to whether or not Garda Sikring Group is in full compliance with the law. Litigation may occur. At all times, Garda Sikring Group will act responsibly and abide by the final decisions rendered by the courts.

Issues of compliance with requirements of governmental agencies may also arise. It is important to Garda Sikring Group management to be informed of any such issues at an early date. Each employee has the responsibility to inform Garda Sikring Group management immediately if he or she believes that such an issue may exist.

YOUR RESONSIBILITIES

- ✓ **Be compliant** with all applicable laws.
- ✓ **Inform** Garda Sikring Group management in case of any compliance issues at an early date.

For further information on Compliance, consult with immediate manager.

2. Harassment and discrimination

Each employee is entitled to fair and respectful treatment by his or her supervisors, subordinates and peers.

Garda Sikring Group will not tolerate discrimination or harassment based on race, religion national origin, sex, sexual orientation, disability, age or any other relevant category. All employees shall conduct themselves in accordance with the letter and spirit of these principles.

Garda Sikring Group supports the spirit and intent of applicable human rights and anti-discrimination laws and will not accept any behaviour which conflicts with these principles and laws.

The individual's personal dignity, privacy and rights must be respected. Garda Sikring Group undertakes to respect the human rights of those affected by the company's operations, and to influence the company's business relations to do the same.

Garda Sikring Group are expected to follow the ILO convention's recommended minimum age for access to employment. Garda Sikring Group will not tolerate any form of forced labour, slave labour or involuntary labour. All working relationships must be free of choice and free of threats.

YOUR RESPONSIBILITIES

- ✓ **Do not make or tolerate** sexual jokes, comments about a person's body, graphic statements about sexual matters, or engage in offensive behaviour of a sexual nature.
- ✓ **Do not make or tolerate** jokes, comments, remarks or treat any employee differently because of his or her race, colour, sex, national origin, age, religion, disability, marital or family status, or any other non-business related consideration. Doing so is discriminatory.
- ✓ **Do not tolerate** bullying or any similar behaviour
- ✓ **Do not display** sexually suggestive objects or pictures at work.
- ✓ **Create an atmosphere** free of any suggestion of discrimination. Harassment or bullying.

Register violations on behalf of yourself or if witnessing other situations through the whistleblowing portal

For further information on Harassment and Discrimination, consult the local Human Resources representation.

3. Environment

Garda Sikring Group is committed to growing the Company 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, Garda Sikring 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:

1. 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.
2. Maintain an active self-monitoring program to ensure compliance with government and company policy.
3. Continue to assess available technology to reduce environmental impacts and implement improvements beyond compliance levels where economically viable.
4. In the absence of legislation, to apply cost-effective management practices to advance environmental protection and to minimise environmental risk.
5. 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.
6. Where appropriate, encourage and participate in cooperative research for new, better, cost-effective solutions to environmental obstacles.
7. 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.

YOUR RESPONSIBILITIES

- ✓ **Always comply** with your facility's environment, health and safety rules and procedures, and be sure of the "safe way" to perform a task. If unsure, ASK!
- ✓ **Understand** the specific environmental requirements for your job function.
- ✓ **Ensure** that environmental permits have been obtained and are up-to-date, and that records, documents, and labels are complete, accurate, and truthful.

For further information on Environment, and/or on Workplace Standards consult immediate manager.

ESG Policy

4. Personal Information

Access to personal information about Garda Síking Group employees must remain restricted to people with a “need to know” within Garda Síking Group and will be transmitted to other employees or third parties only for legitimate and necessary business purposes or to satisfy legitimate investigative or legal requirements.

All sensitive information must be protected by restricted handling of information and securing written and electronic documentation.

YOUR RESPONSIBILITIES

- ✓ Employees who are responsible for maintaining personal information must ensure that the information is not disclosed inappropriately or misused.

If you think there may have been a breach of this requirement please report it immediately to through the whistleblowing portal.

Data Privacy Policy

5. Conflict of Interest (1/2)

Business transactions must be conducted with the best interests of Garda Síkring Group in mind.

Nobody, whenever an individual, a commercial entity, or a company with a relationship to a Garda Síkring Group employee may improperly benefit from Garda Síkring Group through his or her relationship with the employee or as a result of the employee's position in the company. Furthermore, no employee may personally benefit in an improper way.

Employees are expected to advance Garda Síkring Group's legitimate business interests when the opportunity to do so arises. Employees may not (a) take for themselves (or direct to a third party) a business opportunity that is discovered through the use of the Garda Síkring Group's property, information or position or indeed any other opportunity which it reasonably believes may be of interest to Garda Síkring Group, (b) use Garda Síkring Group's property, information or position for personal gain or (c) compete with Garda Síkring Group. Employees owe a duty to Garda Síkring Group to advance its legitimate interests whenever the opportunity to do so arises.

Other examples of ways in which conflicts of interest could arise:

- Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with Garda Síkring Group.
- Hiring or supervising family members or closely related persons.
- Serving as a board member for an outside commercial company or organisation.
- Owning or having a substantial interest in a competitor, supplier or contractor.
- Having a personal interest, financial interest or potential gain in any Garda Síkring Group transaction.

YOUR RESPONSIBILITIES

- ✓ **Place compliance** with laws and ethical principles above private gain.
- ✓ **Do not solicit** or accept anything of more than minor value from business suppliers.
- ✓ **Do not have a position** with, nor financial interest in, another business that interferes or appears to interfere with our duties or responsibilities, unless approved in advance by the location Human Resources representative
- ✓ **Do not conduct/transact** Company business with a relative unless approved in advance by the location Human Resources representative.
- ✓ **Disclose** any financial interest in or position with any competitor.
- ✓ **Report** suspected violations of conflict of interest procedures to the location Human Resources representative, or report suspected violations through the whistleblowing portal

For further information on Conflict of Interest, consult immediate manager.

5. Conflict of Interest (2/2)

- Placing company business with a firm owned or controlled by a Garda Síochána Group employee or his or her family.
- Accepting gifts, discounts, favours or services from a customer/potential customer, competitor, or supplier, unless equally available to all Garda Síochána Group employees.

Situations that may cause conflict, or give the appearance of conflict, between an employee's responsibilities towards Garda Síochána Group and his or her personal interests should be avoided.

Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the HR department.

YOUR RESPONSIBILITIES

- ✓ **Place compliance** with laws and ethical principles above private gain.
- ✓ **Do not solicit** or accept anything of more than minor value from business suppliers.
- ✓ **Do not have a position** with, nor financial interest in, another business that interferes or appears to interfere with our duties or responsibilities, unless approved in advance by the location Human Resources representative
- ✓ **Do not conduct/transact** Company business with a relative unless approved in advance by the location Human Resources representative.
- ✓ **Disclose** any financial interest in or position with any competitor.
- ✓ **Report** suspected violations of conflict of interest procedures to the location Human Resources representative, or report suspected violations through the whistleblowing portal

For further information on Conflict of Interest, consult immediate manager.

6. Document Retention and Destruction

All employees should protect Garda Síkring Group's assets and ensure that they are used efficiently and for legitimate business purposes in the interests of the Company.

Garda Síkring Group's assets include not only equipment, materials, systems, data, supplies and services that are purchased by Garda Síkring Group but also its extremely valuable confidential information and the information entrusted to it by persons with whom it conducts or seeks to conduct business. Altering, shredding or otherwise destroying documents or records (written or electronic) that are relevant to any breach of law or any pending, threatened or anticipated government investigation, audit, regulatory proceeding or lawsuit is strictly prohibited.

Similarly, we must cooperate fully in any authorized internal or external investigation by or on the order of Garda Síkring Group's auditors, government or law enforcement officials, regulators or courts and must not make any false or misleading statements or otherwise engage in misleading conduct.

YOUR RESPONSIBILITY

- ✓ **Exercise appropriate** care, custody and control over Garda Síkring Group's files, documents, films, and electronically recorded data or images).
- ✓ **Keep confidential** information stored properly when it is not being used.
- ✓ **Destroy unnecessary** or outdated files and information after having made sure that there is no longer any requirement to keep the information stored (e.g. under the law or court order)
- ✓ **Do not destroy** files or information if you have reason to believe that they could become relevant in an upcoming crisis or in an anticipated or pending legal dispute or administrative procedure.

For further information on Document Retention, consult immediate manager.

7. Confidentiality (1/2)

In carrying out Garda Sikring Group's business, employees often have access to confidential or proprietary information about Garda Sikring Group, its investors and business partners, its investee companies or potential investee companies, or other third parties.

Employees must protect the confidentiality of such information, except when disclosure is authorized or legally mandated. Confidential information includes, among other things, any non-public information concerning Garda Sikring Group, including its businesses, financial performance, results or prospects, financial and other information about potential acquisitions and any non-public information provided by a third party with the expectation that the information will be kept confidential and used solely for the business purpose for which it was conveyed.

All information regarding the business, affairs and activities of Garda Sikring Group and its investees and potential investees should be considered confidential by employees unless and until it is properly made available to the public. Any employee who receives confidential information is prohibited from disclosing such information to any other person unless it is necessary to do so in the conduct of Garda Sikring Group's business and then only if the employee takes appropriate steps to protect the continuing confidentiality of such information.

Procedures on the next page.

YOUR RESPONSIBILITIES

- ✓ **Never disclose** confidential information
- ✓ **Protect** Garda Sikring Group's confidential or proprietary information by confidentiality agreements, appropriate storage and encryption.

For further information on Confidentiality, consult immediate manager.

7. Confidentiality (2/2)

In order to prevent the misuse or inadvertent disclosure of material information, the procedures set forth below should be observed at all times:

- confidential matters should not be discussed in places where the discussion may be overheard, such as elevators, restaurants, airplanes or taxis;
- confidential documents should not be read in public places, left in unattended conference rooms, left behind when a meeting is over or discarded where they can be retrieved by others. Similarly, employees should not leave confidential information at their homes where it can be accessed by others;
- care should be taken in communicating confidential matters on wireless telephones or other wireless devices;
- transmission of confidential information via electronic means, such as by fax or e-mail, should be made only where it is reasonable to believe that the transmission can be made and received under secure conditions;
- access to confidential electronic data should be restricted through the use of passwords;
- unnecessary copying of confidential documents should be avoided and extra copies of confidential documents should be shredded or otherwise destroyed;
- documents and files containing confidential information should be kept in safe and controlled locations;
- all proprietary information, including computer programs, analyses, models and other records, are the property of Garda Síkring Group and may not be removed, disclosed, copied or otherwise used except in the normal course of employment or with prior authorization. When leaving the employment of Garda Síkring Group, an employee must return all confidential information in his or her possession and is required to continue to protect any confidential information learned during the course of his or her employment

YOUR RESPONSIBILITIES

- ✓ **Never disclose** confidential information
- ✓ **Protect** Garda Síkring Group's confidential or proprietary information by confidentiality agreements, appropriate storage and encryption.

For further information on Confidentiality, consult immediate manager.

8. Use of Computers and Internet

The Company's computer resources and information technology systems are intended to be used for business purposes.

While employees are generally permitted to also use such resources and systems for incidental personal purposes, they must use them in a responsible manner and in a manner that would not reasonably be expected to expose them to loss or damage.

Further, employees are not permitted to use Garda Sikring Group's technology resources to engage in communications that contain, promote or constitute illegal or obscene information or activities, matters that could reasonably be expected to expose Garda Sikring Group to any criminal, civil or regulatory censure or liability whatsoever, matters that would be embarrassing to Garda Sikring Group or its associates or damaging to its or their business and affairs if publicly disclosed, or information or conduct that unduly interferes with the work of the particular employee or of other employees.

YOUR RESPONSIBILITIES

- ✓ **Do not expect** electronic messages to be private or confidential.
- ✓ **Do not use** these systems to solicit or communicate in a manner which would violate this or other Garda Sikring Group policies including communicating discriminatory or harassing statements, pornographic material, inappropriate humour, solicitations regarding political or charitable matters, or for any illegal purposes.
- ✓ When creating messages, **always keep in mind** that these may be made public or used in legal proceedings.
- ✓ **Use good judgment** in using these systems and exercise the same judgment in creating electronic messages, as you would use in paper documents.
- ✓ When storing private documents on Company computers, these must be saved in **own folder marked "private"**.

For further information on Electronic Communication, consult immediate manager or read the applicable IT-Policies.

IT-User Policy

9. Antitrust (1/2)

Employees are expected to compete vigorously in business dealings on behalf of Garda Síkring Group but also to deal fairly with Garda Síkring Group's investors, service providers, suppliers, competitors and other employees.

Decisions in the purchase of goods or services should be made only on sound business principles and in accordance with ethical business practices. No employee should take unfair advantage of any other person through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. No employee should unfairly disparage or misrepresent competitors of Garda Síkring Group either generally or in respect of a particular matter or transaction and should never seek to induce another party to breach a contract in order to enter into a transaction with Garda Síkring Group.

Antitrust laws apply to all business arrangements, irrespective of their form (in writing or not), as well as to business conduct in general.

Antitrust laws apply if the negative impact on competition is effective in a country, even though the anti-competitive behaviour is conducted outside that country.

Potentially Critical Agreements

Because of the complexity of antitrust legislation, all agreements which may have a negative effect on competition must be verified by entity CEO.

Clauses which may have a negative effect on competition include:

- Exclusivity clauses
- Pricing clauses
- Tie-in clauses
- Territorial restrictions
- Price discrimination (including preferential discounts and rebates)

YOUR RESPONSIBILITIES

- ✓ **Never** agree with competitors to fix prices, or divide markets.
- ✓ **Never** enter into any understanding that restricts either party's discretion to manufacture any products or provide any service, or that limits selling to, or buying from, a third party.
- ✓ **Never**, enter into any understanding that might:
 - ✓ Restrict a customer's discretion to use or resell one of Garda Síkring Group's products;
 - ✓ Condition the sale of a product or service on the customer's purchase of another product or service from Garda Síkring Group.
- ✓ **Comply** with the principles and rules of fair competition and do not violate applicable antitrust laws.
- ✓ **Contact** the entity CEO for prior approval before any meeting with a competitor. If you attend a trade association meeting and competitors are present, never discuss at the meeting or at any social gathering prices, costs, sales, profits, market shares, or other competitive subjects. If such matters enter into the discussion, stop the discussion, or leave the meeting or social gathering, and notify the entity CEO.
- ✓ **Report any activities** that appear contrary to the antitrust laws to the entity CEO and/or through the whistleblowing portal

For further information on Antitrust, consult the entity CEO.

9. Antitrust (2/2)

Prohibited Agreements and Arrangements

Agreements between competitors aimed at coordinating market behaviour are generally prohibited. This includes:

- Agreements to fix prices, costs, profits, margins, or terms and conditions of sale
- Agreements to allocate territories or customers
- Bidding arrangements
- Agreements to limit or restrict products or services
- Agreements to allocate or limit production facilities, volumes, inventories, or capacity
- Agreements to apply a boycott, i.e. a refusal to supply or to accept delivery.

Abuse of Dominant Market Position

Companies who hold a strong position in a market can be regarded to have a so-called “dominant market position”. In this case, the “abuse” of a dominant market position can be illegal.

Examples of “abuse” of market power by a market player with a dominant market position can be:

- Excessively high prices
- Temporary low price strategy to eliminate competition
- Loyalty rebate schemes
- Restricting products offered or tying the purchase of products to other purchases
- Refusal to supply

Marketing and pricing strategies, as well as rebate schemes must be regularly reviewed with, and new strategies and schemes must be discussed prior to implementation, entity CEO.

Mergers, Acquisitions (including Divestitures)

Antitrust law normally prohibits mergers or acquisitions which would bring about a dominant market position and could injure competition. Moreover, notification to government authorities is required in most jurisdictions before certain mergers or acquisitions can be made. Group CEO should be involved in acquisition projects at an early stage.

Intellectual Property Rights

Contracts relating to the use of intellectual property rights (patents, trademarks, designs, copyright, know-how and trade secrets) are often subject to special rules and may therefore be critical in terms of antitrust. Any enforcement of intellectual property rights must be approved by Group CEO.

YOUR RESPONSIBILITIES

- ✓ **Never** agree with competitors to fix prices, or divide markets.
- ✓ **Never** enter into any understanding that restricts either party’s discretion to manufacture any products or provide any service, or that limits selling to, or buying from, a third party.
- ✓ **Never**, enter into any understanding that might:
 - ✓ Restrict a customer’s discretion to use or resell one of Garda Sikring Group’s products;
 - ✓ Condition the sale of a product or service on the customer’s purchase of another product or service from Garda Sikring Group.
- ✓ **Comply** with the principles and rules of fair competition and do not violate applicable antitrust laws.
- ✓ **Contact** the entity CEO for prior approval before any meeting with a competitor. If you attend a trade association meeting and competitors are present, never discuss at the meeting or at any social gathering prices, costs, sales, profits, market shares, or other competitive subjects. If such matters enter into the discussion, stop the discussion, or leave the meeting or social gathering, and notify the entity CEO.
- ✓ **Report any activities** that appear contrary to the antitrust laws to the entity CEO and/or through the whistleblowing portal

For further information on Antitrust, consult the entity CEO.

10. Anti-Bribery, Entertainment and Gift (1/2)

Garda Sikring Group has zero tolerance towards any acts of bribery.

Garda Sikring Group will investigate any instances of bribery and will take disciplinary and other appropriate actions accordingly. In case of any doubts about whether offering or receiving of any benefits are acceptable or not, employees should discuss the question with their supervisor and/or contact the local HR-Director for advice. Modest gifts and reasonable entertainment may be given and received, where legally permitted and in accordance with local business practices, to and from persons doing business or seeking to do business with Garda Sikring Group.

No gift or entertainment should be of such nature or value as to constitute a real personal enrichment of the recipient or to create an obligation on the part of the recipient, or as would reflect unfavourably on Garda Sikring Group or the donor or recipient if subjected to public scrutiny. Cash or equivalents are not to be given or accepted. Employees are encouraged to be thoughtful with respect to gifts given and accepted in the context of those relationships to ensure that they are appropriate, and would reasonably be perceived as appropriate, in the circumstances.

From Garda Sikring Group employee to another party (giving)

No employee shall make any payment, or kickback, or offer improper financial advantage to any party (including an official of a government or a government-controlled entity) for the purpose of obtaining business or other services, nor shall any employee extend personal benefits to any party (including customers or other persons) if such benefits are outside the usual business practice at a location or violate applicable laws.

Business entertainment and business gifts to any party (including government officials, if permitted, as well as to other persons) must be in compliance with the rules and regulations of government bodies as well as those of business partners. Invitations to events have to be restricted to major customers, whereby spouses and/ or other relatives must not be invited.

YOUR RESPONSIBILITIES

- ✓ **Act** ethically and with integrity.
- ✓ **Do not make** any corrupt payment or bribe in any form, regardless of amount, directly or through an intermediary.
- ✓ **Do not accept** or give money as a gift.
- ✓ **Do not create** or maintain a secret or unrecorded fund or asset for any purpose.
- ✓ **Do not make** any false or misleading entries in Garda Sikring Group's records or make any payment on behalf of Garda Sikring Group without adequate supporting documentation.
- ✓ **Report** any suspected acts of bribery or violations through the whistleblowing portal

For further information on the various Anti-Bribery laws and for information on bribery or entertainment and gifts, consult immediate manager.

Fraud, Anti-Bribery and Corruption Policy

10. Anti-Bribery, Entertainment and Gift (2/2)

Travel expenses incurred by invited customers shall only be reimbursed to an extent that it is objectively necessary and reasonable (well-grounded, appropriate number of guests, class of travel, level of accommodation costs and length of time); if customers suggest that a week-end visit or non-business related events are added to the business trip, such suggestions should be handled for their own expenses.

Third parties must not be used to circumvent any of the policies mentioned above. This means that subcontracts, purchase orders, consulting agreements etc. should not be used to channel improper benefits to any party (including government officials, employees of other businesses, their relatives or business associates). Payments to agents should represent no more than an appropriate remuneration for legitimate services rendered by such agent. Additionally, only contractual terms with a clear commercial justification are acceptable (all contracts have to outline in a clear and transparent way for what Garda Sikring Group is paying and what Garda Sikring Group does expect to receive in return). There must be no “off the books” or secret accounts. All applicable laws are to be strictly observed.

From another party to Garda Sikring Group employee (receiving)

Garda Sikring Group employees shall not accept inappropriate or illicit benefits which might be offered to them by any party (including customers, suppliers or other persons). However, Garda Sikring Group employees do not have to refuse every customary present. If the value of such present (as a rule of thumb) exceeds common conventions or is greater than the amount of EURO 50, employees are expected to agree with their superior whether the gift is acceptable (there may be times when a more expensive gift may be more appropriate to the occasion) or should be refused (in this case the giver has to be informed politely on the refusal).

Nevertheless employees are expected to hand the gift over to the company in order to put it into a basket and distribute it to the employees on a random basis. Money (cash, cheques, or any form of transfer of currency) should never be given or accepted as a gift. Invitations to business entertainments that are not in line with customary practice in the relevant country should be declined. In case Garda Sikring Group employees are entertained by any party (including suppliers or other persons) these employees must ensure that inappropriate event and travel expenses are not borne by the inviting party.

YOUR RESPONSIBILITIES

- ✓ **Act** ethically and with integrity.
- ✓ **Do not make** any corrupt payment or bribe in any form, regardless of amount, directly or through an intermediary.
- ✓ **Do not accept** or give money as a gift.
- ✓ **Do not create** or maintain a secret or unrecorded fund or asset for any purpose.
- ✓ **Do not make** any false or misleading entries in Garda Sikring Group's records or make any payment on behalf of Garda Sikring Group without adequate supporting documentation.
- ✓ **Report** any suspected acts of bribery or violations through the whistleblowing portal

For further information on the various Anti-Bribery laws and for information on bribery or entertainment and gifts, consult immediate manager.

Fraud, Anti-Bribery and Corruption Policy

11. True and Fair Financial Reporting, Financial Information

Financial statements shall be prepared in compliance with local regulation as well as with the local laws and regulation and according to Norwegian GAAP reflected by Garda Sikring Group Accounting Guidelines and thus provide a true and fair view.

Furthermore, the reliability of the financial reporting shall be enhanced by effectively operating internal controls.

Investors, creditors and others have a legitimate interest in Garda Sikring Group's financial information. The integrity of Garda Sikring Group's financial reporting is based upon the validity, accuracy and completeness of the information upon which its accounts and records are based. Garda Sikring Group expects employees involved in creating, processing or recording such information to take responsibility for its integrity.

Without limiting the foregoing, employees may not be involved in the submission of false invoices or expense reports, the forging or alternation of cheques or misdirection of payments, the unauthorized handling or reporting of transactions, the creation or manipulation of financial information so as to artificially inflate or depress financial results, or any improper or fraudulent interference with or coercion, manipulation or misleading of Garda Sikring Group's auditors.

Information in Garda Sikring Group's public communications, including securities commission filings and communications with investors, must be full, fair, accurate, timely and understandable. All employees who are involved in the Garda Sikring Group's disclosure process, including all senior financial personnel and all employees with supervisory responsibilities with respect to Garda Sikring Group's public disclosure documents, are expected to act in furtherance of this requirement. In particular, these individuals are required to be familiar with and to comply with all applicable disclosure requirements and are prohibited from knowingly misrepresenting, omitting, or causing others to misrepresent or omit, material facts about Garda Sikring Group to others, whether within or outside Garda Sikring Group.

YOUR RESPONSIBILITIES

- ✓ **Make appropriate** and timely entries in Garda Sikring Group books and records to record all transactions.
- ✓ **Diligently perform**, and adequately document the performance of, all control procedures you are responsible for.
- ✓ **Do not make** an inaccurate, false, or misleading entry in Garda Sikring Group books and records.
- ✓ **Do not make** or approve payments without adequate supporting information or if any part of the payment is to be used for any purpose other than the purpose described in the supporting documentation.
- ✓ If you participate in the preparation of financial reports, know and follow Garda Sikring Group's accounting and internal control procedures.
- ✓ **Report** any inaccurate, false, or misleading records through the whistleblowing portal

For further information on Financial Controls and Records, consult with the local controller.

12. Political and Charitable Activities

Garda Sikring Group recognises the legitimate interests of employees in being involved in political activities, including the support of political candidates and the expression of opinions on political or public issues.

Similarly, Garda Sikring Group recognises and encourages employees' involvement in charity and community service and the making of charitable donations. However, employees should make it clear that they are acting or speaking on their own behalf and not on behalf of Garda Sikring Group in engaging in such activities or making such donations unless they are authorized by Garda Sikring Group to act on its behalf. Donations of Garda Sikring Group's funds or assets and the use of Garda Sikring Group's name in support of political or charitable causes may only be made with proper authorization.

Nothing in this policy is intended to restrict in any way any persons from participating in political activities of any type; however, unless specifically approved in advance no person should use Garda Sikring Group's resources for political activities or attribute any political position to Garda Sikring Group or any of its employees.

YOUR RESPONSIBILITIES

- ✓ **Never** represent your personal political activity as being Garda Sikring Group's political activity.
- ✓ **Never** use Garda Sikring Group assets or employees in support of political activities without approval of the local HR-Director

For further information on Political Contributions and Activities, consult with immediate manager.

13. Drugs and alcohol

The intention of the following guidelines is to help employees who have a drug problem. If drug abuse is suspected or there is a need to raise awareness of the topic the safety representative and/or the occupational health service should be involved. Our wish is to create greater transparency around such questions and to establish support and assistance.

Drug abuse is defined by:

- Any unauthorised use during working hours
- Use outside working hours in such quantities, and at such times, that it either leads to absence from work or that the person concerned shows up indisposed to work
- Use during or outside working hours in such quantities that it must be assumed to have an impact on the person concerned reliability, loyalty and sound judgment from a safety point of view

Symptoms of abuse can be:

- Frequent absences in connection with holidays and pay days
- Irregular attendance at place of employment/work
- Frequent sick calls for simple illnesses
- Change in work efficiency or malfunction of the service
- Change in mental balance, ability to cooperate and willingness to cooperate

Guidelines for follow-up:

- Personnel with a substance abuse must contact their nearest guardian or doctor themselves.
- Personnel who see that a colleague has problems with drugs must contact the nearest supervisor who, if necessary, passes the report on so that measures can be taken. It is not dishonest to take such a step, but a significant way to help a colleague.
- If drug use is detected, the person concerned is summoned to the nearest superior. He/she is made aware that the behaviour is contrary to acceptable professional ethics, and the person concerned is instructed (in writing) to seek medical treatment for treatment options.
- If the person concerned recognises that there is drug use, follow-up must be carried out with a doctor.
- In the event of a new offence, a written warning is given with a demand for a change in behaviour. Further offenses will result in dismissal.

YOUR RESPONSIBILITIES

- ✓ **Do not** consume alcohol or illegal drugs in work situations.
- ✓ **Register** violations on behalf of yourself or if witnessing other situations through the whistleblowing portal

For further information on drugs and alcohol, consult immediate manager.

14. Reporting Violations

Based on Garda Síking Group's culture of integrity and honesty, issues should be discussed and addressed before a violation occurs.

However, employees are expected to report violation of law, regulation or this Code of which they become aware. Similarly, any employee who is unsure as to whether a violation has occurred or who needs guidance as to whether to take a particular action that may be, or may appear to be, a violation, should seek advice and consult with the appropriate contact persons. Individuals who report a violation or potential violation or who cooperates in the investigation of a violation or potential violation will not be subject to harassment, discipline or retaliation as a result of such report.

Violations can be reported through the whistleblowing portal and/or representatives of supervisor, manager, entity CEO, Group HR, and Group CEO.

Whistleblowing portal is linked on entity website, or contact local HR-representative for link to the portal.

YOUR RESPONSIBILITIES

- ✓ **Familiarise** yourself with this Employee Code of Conduct.
- ✓ **Understand** when you might use the Garda Síking Group ethics and compliance whistleblowing portal.
- ✓ **Respect** anyone who in good faith raises or helps address a violation of the Code of Conduct or other ethics or integrity concern.
- ✓ **Respect** the privacy and personal data of others.
- ✓ **Speak Up!** Use the – in your personal judgment – most appropriate channel including your colleagues, your supervisor, your supervisor, manager, entity CEO, HR-team or Group CEO.
- ✓ **Register** violations through the whistleblowing portal

For further information on Reporting Violations, consult immediate manager.

Whistleblowing Policy

15. Implementation of the Code and Consequences of Violation

It is ultimately the responsibility of the Garda Sikring Group board of directors to monitor compliance with this Code. The monitoring of compliance is achieved through systems and processes implemented by Garda Sikring Group management that are designed to result in wide dissemination of the Code, to encourage compliance with its provisions and to facilitate the reporting of actual or suspected breaches. Such breaches are investigated by management as appropriate and, depending upon the nature of the breach and other relevant circumstances, either dealt with by management with the results reported to the board or referred to the board for further action.

Each employee shall receive a digital copy of this Employee Code of Conduct. It is the duty of management to include the Code of Conduct in employee training programs. Management shall monitor compliance with the Code and, if need be, implement special monitoring programs. Breaches will be dealt with promptly and fairly in a manner that takes into account the seriousness of the violation and the conduct of the employee in response thereto.

Self-reporting by employees is encouraged and will be given due consideration by Garda Sikring Group in dealing with any violation. Disciplinary action can include, but is not limited to, an impact on the applicable individual's record or remuneration, suspension or termination of employment, pursuit of any and all remedies available to Garda Sikring Group for any damages or harm resulting to it from a violation, and referral to the appropriate legal, regulatory or law enforcement body.