



Group Anti-Harassment and Non-Discrimination Policy

June 2022

Executive Summary

The purpose of this Policy is to prevent harassment and discrimination. In this Policy, we set out what we expect from all our people in their interactions with others. This Policy applies to every Verisure colleague.



Introduction

At Verisure, we value all our colleagues as unique individuals and welcome the diversity of profiles, experiences and perspectives we together bring to our Company. We believe that we all have the right to work in an inclusive and professional environment in which our merit, knowledge and skills are the critical factors of our success and we are committed to respecting the dignity of each individual. We promote an environment where everyone should be treated equally regardless of their background, beliefs, choices or personal characteristics; where everyone is valued, respected, listened to, and can bring 100% of their authentic self to work.

To provide this work environment, we do not tolerate any form of discrimination or harassment and strive to prevent such situations from arising by implementing adequate measures and by raising awareness. We encourage those who encounter or witness misconduct to speak up, we investigate suspicions, we take disciplinary actions in accordance with local labour legislations and offer support where suspicions are substantiated, and we have zero tolerance to retaliation against those speaking up in good faith.

We will be implacable when it comes to protecting our colleagues from these types of behaviour and as Verisure colleagues, regardless of our position, function or country of employment, we are all responsible for ensuring and maintaining a safe work environment. Our aim is to achieve an environment free of unacceptable behaviour such as harassment or discrimination. We are counting on everyone to assist the Company in not engaging in, and in preventing, detecting and calling attention to any behaviour that could constitute harassment or discrimination. This behaviour is embedded in our DNA values, Winning as a Team, and with Trust & Responsibility. We leverage our strengths and our diversity to deliver even better outcomes, while developing and supporting one another. We always do the right thing, acting with integrity.

Key Principles

Individual responsibility regarding harassment and discrimination We consider it is the individual responsibility of each of us to treat each other with equal respect, to prevent and address discrimination and harassment situations and to not engage in such type of behaviours. This includes speaking up about inappropriate behaviours.

Preventing harassment and discrimination within our work environment We will take all the necessary steps and implement all the required preventive measures to reduce the risk of harassment and discrimination occurring in our work environment, which we believe is the most effective approach against these types of behaviour.

Commitment to protection from harassment and discrimination We are committed to protecting all colleagues from any form of harassment and discrimination, as well as those who report these types of behaviour. We all have the responsibility, duty and obligation to apply this Policy and its principles to the duties and responsibilities we perform daily.



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Providing equal opportunity On top of protecting colleagues and preventing situations of harassment or discrimination, Verisure strive towards achieving equal opportunity through the entire course of the employees' career, from recruitment, to hiring, as well as subsequent career development and growth within the Company. Verisure is fully committed in having an equal opportunity approach in which no discrimination takes place in each of these stages of the employees working life.

We truly believe that everyone must be granted with the same opportunities for hiring, advancement and benefits, without discriminating due to any of the protected characteristics (i.e. age, gender, sexual orientation, religion, moment in life cycle, nationality, disability status, socio-economic background, etc.).

Respect of applicable laws and other applicable policies Verisure will always comply with applicable national and regional (e.g., EU) laws and regulation, and collective agreements, on harassment and discrimination, which take precedence over this Policy. This Policy is intended to complement applicable legislation and collective agreements in that it may go further in some areas. Any local and Group policies must, as a minimum, be aligned with this Policy in addition to applicable laws and collective agreements.

Who Must Follow This Policy?

This Group Policy applies to any company or affiliated entity of the Verisure Group at any given time. It is mandatory for all Verisure colleagues.

Questions and Support

Please contact in first instance your HR Business Partner (HRBP) if you have any questions related to this Policy. Group HR - Employee & Labour Relations is also available to answer any questions.

Reporting of potential misconduct

We encourage our colleagues to in first instance reach out to their line manager or HRBP if they have a concern. In many cases, your manager or local HRBP will be best placed to follow up on your concern.

For cases when you do not feel comfortable raising your concern within your organization, you can use the dedicated Speak Up Channel that allows you to anonymously report your concerns by sending a report through the platform <https://www.verisurespeakup.com>. Reports sent through this address will be processed by an independent third-party set-up platform before being shared with Group Legal Compliance and Group HR Employee and Labour Relations at Verisure, as per the Group Speak Up Policy and related implementing guidelines.



Other related policies

The below policies are related to this Group Anti-Harassment and Non-Discrimination Policy and can be consulted in case of questions:

- Group Code of Conduct
- Group Speak Up Policy

Harassment: Definitions and different forms

1. Harassment definition

Harassment, including bullying and mobbing, is considered to be a behaviour directed at an individual or a group which creates an offensive, intimidating, humiliating or hostile work environment. It consists of any improper or unwelcome conduct, through repeated or single events, that might reasonably be expected or perceived to cause offence or humiliation to another person or group of people.

Without limiting what may constitute harassment in a given country, by way of example, the most common forms are included in subsequent sections. Depending on the local legislation of each country, the definition of harassment and different forms may also vary.

Harassment may take many different forms and may be referred under different names depending on the jurisdiction in which it is taking place (i.e. moral harassment, sexual harassment, verbal harassment, etc.). Harassment in general implies conduct such as verbal, visual, or physical behaviours; gestures, actions or communications, which may demean, intimidate, belittle, humiliate or embarrass another person and it can also include ignoring or excluding a colleague. Such conduct may amount to harassment no matter whether they are repeated or occurred in a single incident.

2. Harassment can take many forms

There are different types of harassment, including but not limited to, harassment, bullying/mobbing and sexual harassment. The below section includes examples of different forms harassment can take, although the list is not exhaustive.

2.1 Inappropriate behaviour

Some examples which constitute inappropriate behaviour and bullying/mobbing between work colleagues include, but are not limited to the following:

- Humiliating, insulting, name-calling or spreading negative stereotypes which can affect a person's dignity.
- Using offensive language, making unwanted and unsuitable jokes or fun of other.
- Making offensive, unwanted comments or adopting an inappropriate behaviour as described in this section, based on discriminatory grounds, including but not limited to a



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person's status, appearance, sexual orientation, religion, gender identity or any other personal characteristics, traits of character, personal or professional situation.

- Excluding someone on purpose from work related events.
- Circulating or posting pictures, cartoons, posters, letters, notes, e-mails, invitations, or other materials with offensive and hurtful content.
- Intimidating acts, threats, expressly ignoring (not talking or listening to), excluding or setting apart a person or a group of people.
- Discrediting a person, damaging their honour or reputation.
- Improper management behaviour, for example, including but not limited to, constant monitoring of employees during working hours or requesting their geolocation.
- Any type of sexist comments, attitudes, practices or behaviour.
- Defaming and/or denigrating someone or their family.
- Deliberately harming an employee's work, for example, by knowingly withholding relevant information.
- Preventing employees from progressing by intentionally blocking promotion or training opportunities.
- Overbearing supervision or misuse of power or position.
- Unjustified and non-factual based constant criticism towards the employee's work.
- Any other behaviour and treatment that demonstrates hostility, disrespect or degrading someone.

2.2 Physical violence or physical harassment

Physical violence or physical harassment, include acts where someone or a group of people inappropriately touch, physically misbehave towards, or assault another person or a group of people against their will.

The most common forms related to physical harassment include, but are not limited to:

- Unwelcome touching of another person's hair, clothes or body.
- Blocking another person's movement or grabbing them.



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- Any type of physical harassment as detailed in the sexual harassment section included below.

Physical violence can be considered to be any other type of physical assault or unwelcomed and unsuitable physical behaviour or violence. In this sense, physical violence includes, among others, pushing, shoving, kicking, punching or the use of any objects or weapons against an individual.

2.3 Sexual harassment: verbal, visual or physical behaviour of a sexual nature

Sexual harassment can be defined as a clear and perceived unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature when submission to or rejection of such conduct is used as the basis for employment decisions or has the purpose or effect of creating an intimidating, hostile, or offensive working environment which may cause a degrading or humiliating situation.

Sexual harassment includes unwanted sexual overtures, inappropriate sexual jokes, or comments regarding sexual activities and is not tolerated at Verisure, regardless of gender.

Some examples of what constitutes sexual harassment include but are not limited to the following examples:

- Inappropriate and suggestive comments, jokes, innuendoes and compliments.
- Conversations of a sexual nature that are offensive to a person, irrespective of their gender.
- Telephone calls, mail, social media or any form of electronic communication containing sexual content.
- Requests for any type of sexual favour, including repeated, unwelcome requests for dates potentially applying specific pressure on the individual.
- Visual sexual harassment such as exposing private parts, sending sexual images or videos to another person.
- Exposing someone to offensive pictures or images without their consent, sending or looking at offensive and inappropriate private photographs of sexual content.
- Displaying nasty or offensive messages or content from a website, book or magazine.
- Physical sexual harassment, including unwelcome, unwanted physical contact without consent; touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing, fondling and forced sexual contact or assault.
- Any other verbal, visual, physical or psychological pressure or assault with the objective of intimate contact.

- When acceptance of any of the above is implicitly or explicitly made a term or condition of employment, promotion, or expanded opportunities.

Discrimination: Definition and forms

1. Definition

Discrimination is any unjust or prejudicial treatment of people on the grounds of actual or perceived personal characteristic(s). Protected characteristics may be defined as per local legislation and may vary from one country to another. In this sense we hereby include different examples of “protected characteristics”:

- Nationality, racial, geographical or ethnic origin (real or supposed).
- Age.
- Family name.
- Language.
- Marital or civil partnership or familial status.
- Pregnancy and maternity (including breastfeeding), paternity, adoption or other types of care leave.
- Family situation.
- Ideology, religious beliefs, political conviction or affiliation and trade union affiliation.
- Sexual orientation (i.e., person's identity in relation to the gender or genders to which they are sexually attracted).
- Gender identity and expression, physical looking.
- Social status, including precarity of the financial situation or place of residency.
- Physical or mental disabilities, handicap, illness, loss of autonomy, medical or genetic condition.
- Customs, habits or way of living manners.
- Any other characteristic protected by law.

As such, a difference of treatment between persons in relevantly similar situations, without objective ground or/and reasonable justification based on a legitimate aim, would qualify as discriminatory.

Discrimination can be based on a single personal characteristic, but it can also be based on the ground of several personal characteristics to which someone or a group of people are affiliated or may be



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perceived to be affiliated. Discrimination may be expressed in many different ways, such as mistreatment, harassment or bullying as defined in the above section, in a direct or indirect way, often referred as direct or indirect discrimination.

In addition, discriminatory behaviour and/or treatment can be grounded on one or several individual characteristics. It can take place through an isolated event, or a series of events, affecting one person or a group of persons.

2. Discrimination can take different forms

In addition to the above, there can be different forms of discrimination, which are sometimes more difficult to identify. This section touch on some of the different forms of discrimination, although this list is not exhaustive and other forms of discrimination can arise.

2.1 Discrimination by perception

Discrimination can be based on actual personal characteristics, e.g., a particular gender or citizenship, but it can also be based on perceived personal characteristics, e.g., discrimination based on mistakenly perceived disability, or a history of a disability. Discrimination by perception is often triggered by myths or stereotypes which lead to misperception.

2.2 Discrimination by association

Discrimination by association is when a person is treated less favourably because they are linked or associated with a person who has a protected characteristic, e.g., colleague, a friend, spouse, partner, parent, or anyone with whom this person is associated.

2.3 Multiple and intersectional discrimination

Discrimination can be grounded on a single personal characteristic but also on several personal characteristics, sometimes called multiple and intersectional discrimination. Some examples of multiple and intersectional discrimination are included but not limited to the examples below:

- When a person suffers discrimination on different grounds on separate occasions, e.g., a person is discriminated against for their specific gender on one occasion, and because of a perceived disability in another instance.
- When a person suffers discrimination on the same occasion but on two grounds, e.g., a person is discriminated against on the same occasion based on their gender and their sexual orientation.
- When a person suffers discrimination based on two or multiple grounds that operate simultaneously and interact in an inseparable manner, producing a distinct and specific individual type of discrimination in itself, e.g., a woman is discriminated against on the basis of both her gender and her age, and is passed over for opportunities because she is “bound to have children soon”.



How to raise a concern

To effectively prevent or address any type of harassment or discrimination, we all have a responsibility to do the right thing and act with Trust and Responsibility. This means having the courage to speak up if we are victims of, or suspect, harassment or discrimination in the work environment.

In case you have a concern, being yourself the victim or having witnessed any type of misconduct, you have a responsibility to speak up being guided by our Group Speak-Up Policy. Said policy explains what types of suspected misconducts you should speak up about and how you can raise your concerns. Additionally, it also outlines the protections available to you and what you can expect from us when speaking up.

Speaking up may be done using one of the following channels, depending what you are most comfortable with:

- To your manager or another leader within Verisure.
- To your contact in HR.
- Using the Speak Up platform, where you can submit concerns (in an anonymous way or not): <https://www.verisurespeakup.com>.

All the information about the raised concern will be kept as confidential. For further information, please consult the Group Speak Up Policy.

Who does what?

Responsible Group	Description
Employees	Must comply with this Policy and speak up in case of concerns.
Group management team	Ensures that harassment and discrimination risks are identified, understood, effectively managed, and oversee the development of an anti-harassment and non-discrimination culture across Verisure.
Country management teams and functional leaders	Identify, mitigate, and manage harassment and discrimination risks relevant to their businesses. Strive towards an inclusive work environment free of any type of harassment or discrimination.
Human Resources team	Provide policies, processes, templates and guidelines in dealing with such matters.



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Receive and investigate any concerns, complaints on suspected harassment and discrimination, take appropriate disciplinary and/or remedial actions and safeguards zero tolerance to retaliation for speaking up in good faith.

Oversee and coordinate the prevention, training and communication programme on anti-harassment and non-discrimination.

Legal team

Collaborate closely with the Human Resources team on the matters above described and provide guidance on specific situations.

Legal team can also be involved in receiving and investigating complaints and in reviewing harassment and discrimination protocols and policies.

Managers and leaders

Ensure that their team understand and complies with this Policy and related processes and guidance.

Strive towards an inclusive work environment free of any type of harassment or discrimination.

Raise a complaint whenever they witness or become aware of such behaviours.

Support, cooperate and sometimes lead relevant fact-finding exercises and/or disciplinary processes in regard to discrimination and harassment.



Version Control

Version History

Version	Effective Date	Status	Approver and date of approval
1.0	June 2022	Original version	Group Compliance Committee (March 2022)