



**verisure**

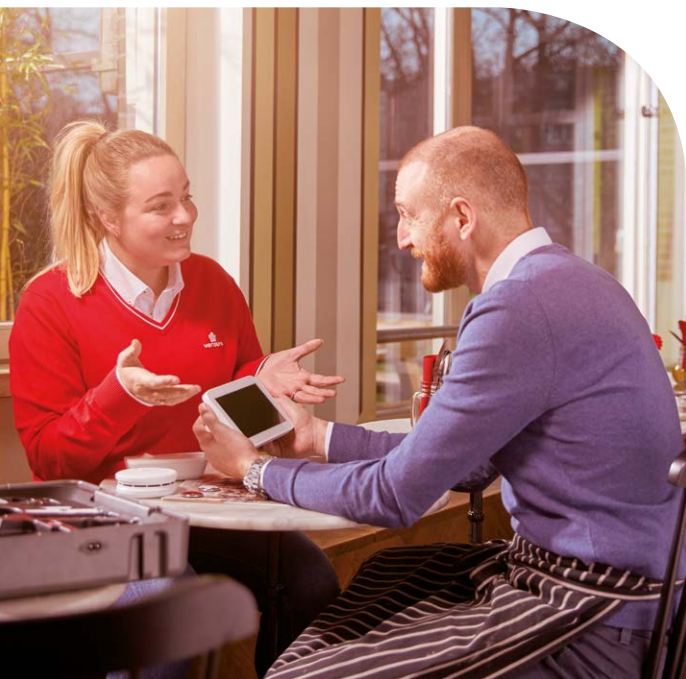


# **Code of Conduct**

***With Trust and  
Responsibility***



**“ We are people  
who protect people.”**



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## 1. Message from our CEO

“ Our customers trust us with what matters most. And our people are our promise; so to earn and keep that trust we must live our DNA and work **With Trust and Responsibility** in everything we do, every day. ”



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Colleagues,

Our mission is to deliver peace of mind to families and small businesses every day. Our customers trust us with their lives and what matters most to them. They deeply trust our products and services and in doing so they trust us to conduct every aspect of our business in a manner that respects that trust – from the way we work with each other, our suppliers and partners, to the way we represent ourselves in the marketplace and the way we compete.

It is everyone's responsibility to understand how these high standards impact our day-to-day work and the way we conduct ourselves.

Our DNA is explicit in our values that guide all our actions: Our passion in everything we do is recognized internally and externally, and our commitment to making a difference is never limited to who we are interacting with. Our approach to innovation and our desire to win as a team is consistent and identifiable. A core tenet of our DNA is 'With Trust and Responsibility', towards one another, our customers and our other key stakeholders. Living this tenet in word and spirit every day is critical to earn and continue building the trust that forms the basis of our continued success.

This Code of Conduct is intended to help direct your decisions day-to-day to reinforce this trust and to act responsibly. It helps distill the kind of company we want Verisure to be. A company which treats everyone fairly and respectfully.

Our vision is to be the number 1 security company in the world. We can only achieve that by acting with integrity and earning trust every day. Our Code of Conduct is clear on what that means. I count on you to read, understand and follow it, every day.

*Austin Lally*

/ CEO /

## 2. Introduction

### 2.1 Our vision, mission and DNA

We believe it is a human right to feel safe and secure. We protect what matters most. Our mission is to bring peace of mind to families and small business owners for generations to come.

We are people who protect people. Our customers are at the heart of everything we do. We are thankful for their loyalty and we believe we need to earn that every day.

We are a highly diverse team with a common core: our DNA. Our DNA is who we are. The essence and soul of our Company. We all have a duty to bring these values to life. Our DNA guides us and articulates what is important to us and our future. It provides a solid grounding as we grow together and continue our mission to bring peace of mind and security to families and small businesses around the world.





## 2.2 Purpose of the code of conduct

Our Code of Conduct sets out the global standards we must follow in our daily work. It provides guidance to all of us on our day-to-day decision making and on our interactions with each other, our customers, our suppliers, government officials, our competitors and our other stakeholders.

## 2.3 Scope of the code of conduct

The Code of Conduct applies to our entire organization, which includes its directors, managers, employees, subcontractors and other collaborators. Everyone in the organization is expected to understand and comply with it.

The Code of Conduct forms part of the Terms of Employment, where and as permissible. The Code of Conduct is globally applicable and implemented in line with local laws.

## 3. Responsibility

### 3.1 Responsibility to understand, comply and seek clarity in case of questions

It is your responsibility to understand and comply with the requirements of the Code of Conduct and laws of the country you work in. Compliance with the Code of Conduct and applicable laws must never be compromised, no matter the short-term gain. Additionally, you must follow our other internal rules, e.g. policies and standards, as they apply in a given situation. These rules may go beyond what is required by the law.

If you are unsure whether a business decision or action is the right thing to do, the following steps can be helpful:

**Pause before you act.** Does a situation make you uneasy? Are your instincts telling you something is not quite right? Would you not feel comfortable if this was reported in the news?

**Think.** Never sacrifice our Company's long-term future for a short-term benefit. Is the approach you are considering consistent with our DNA and values? Does it build or undermine trust in our Company? Will it pose a risk to our reputation?

**Act.** Ask questions and get help. Talk to your HR representative or your contact in another relevant function or get help from your manager. We count on you to speak up!

### 3.2 Responsibility to speak up

If you suspect or witness a violation of our Code of Conduct, you must speak up. You can raise your concern directly with the person in question or with your manager. If you consider it appropriate in view of the nature of the matter, you can also raise the matter directly with HR or Legal, or with senior managers in the organization.

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 **verisurespeakup.com**. Reports sent through this address will be processed by an independent third party set-up platform before being shared with the Group Head of Compliance and Employee and Labour Relations at Verisure.

We will investigate any good-faith concerns promptly and thoroughly. Substantiated violations of the Code of Conduct, other internal rules or applicable laws can result in disciplinary action and, where appropriate, dismissal, legal proceedings and/or criminal charges. For more information please refer to our Group Speak Up Policy.



### 3.3 As a manager of others

Everyone in the organization is responsible for living by our DNA and the Code of Conduct in their day-to-day work and decisions. As a manager of others, you have an additional responsibility to demonstrate our DNA through your actions. Leading by example is critical, as well as acting on any suspected unethical behaviour. You must not tolerate any breaches of the Code of Conduct, even if the person concerned is meeting or exceeding other performance targets. In this regard, the "how" of that we do is as important as the "what" of that we achieve.

As a manager of others, you should regularly encourage your team members to speak up in case they have concerns. In doing so, you should communicate the Company's zero tolerance towards retaliation. Lastly, as a manager of others, you should do your utmost to limit the risk of retaliation against someone in your team who has spoken up.

### 3.4 Strict non-retaliation

We recognize that it takes courage to speak up when you believe something's not right and that it might feel uncomfortable to do so. That is why we do not tolerate retaliation. We are committed to protecting you from suffering adverse consequences for:

- Refusing to do something that violates our Code of Conduct, other internal rules or the law, even if that can result in a short-term loss to Verisure
- Raising a concern in good faith about potential misconduct
- Cooperating with an investigation

Anyone who retaliates against a colleague for engaging in any of these activities will be subject to disciplinary action, up to and including termination.



## 4. Protecting our colleagues

In our DNA, we call it Winning as a Team. We look for and develop our people to be great collaborators: people who build positive team spirit, people who are humble and transparent, people who are great colleagues for one another. We are committed to creating an inclusive work environment, where everyone is valued and respected, experiences the freedom to bring their full self to work and has access to the same opportunities, every step of the way. It's fundamental in the way we attract talent, how we welcome new colleagues, how we reward and develop our people, and how we help people reach their full potential.

### 4.1 Discrimination & harassment

We do not tolerate any type of discrimination. Discrimination is any unjust or prejudicial treatment of people on the grounds of characteristics like gender, racial or ethnic origin, age, national origin, religion or belief, sexual orientation, gender identity or expression, marital status or disability.

We do not tolerate any form of physical or emotional harassment. Harassment is behaviour directed at an individual or a group which creates an offensive, intimidating, humiliating or hostile work environment. Examples include unwelcome sexual advances, offensive jokes, derogatory remarks, etc.

You must not engage in discrimination or harassment. Anyone who engages in such activities will be subject to disciplinary action, up to and including termination.

If you feel you or someone else is experiencing discrimination or harassment, you should always speak up to your Manager or a representative from HR.

For more information, please refer to our Group Anti-Harassment and Non-Discrimination Policy.

Always contact your Manager or a representative from HR or Legal in case of questions or concerns.



## DON'T DO THIS

- Insult or mock a colleague or any third party
- Exclude or isolate a colleague from work activities they should be involved in
- Take revenge on someone
- Request sexual favours
- Engage in unwanted flirting or make sexually tainted comments
- Ask for a date after your request has been declined or ignored
- Make unwanted bodily contact
- Show or circulate any type of offensive materials (for example, rude, racist, or sexual images or cartoons)
- Make degrading comments about appearance
- Make decisions based on whether someone accepts or rejects sexual advances
- Make negative statements regarding colleagues in front of other colleagues, customers or third parties

## DO THIS

- Treat everyone with respect
- Recognize that our different and unique backgrounds mean we can better serve our customers
- Be mindful of cultural differences
- Speak up if you witness discrimination or harassment



### 4.2 Personal data of colleagues

We take data privacy very seriously. We expect you to handle the personal data of everyone at Verisure with care and respect. Do not forward personal data – including contact details – of colleagues to third parties without their consent. Handle any overviews containing personal data of colleagues in accordance with our internal rules. Use judgment before referring to colleagues on social media.

For more information, please refer to our Group Privacy Policy.

Always contact the country Data Privacy Officer or Group DPO (DPO@verisure.com) in case of questions or concerns.

### 4.3 Health and safety

We protect the health, safety and well-being of everyone at Verisure and that of our customers.

It is everyone's responsibility to take the measures necessary to protect our own and others' safety, health and well-being. We are committed to ensuring a safe working environment and to support the health and well-being of everyone.

#### **Use of company cars**

We take road safety very seriously.

When using a company car, you must take particular care to respect all speed limits and other traffic rules. Do not use your phone while driving and do not drive while tired or under the influence. We do not tolerate any behaviour that risks jeopardizing road safety.

#### **Alcohol and drugs**

We conduct business in a safe manner. You may not consume alcohol or drugs during working hours. Also, any suspected use, sale or distribution of illegal substances during working hours will be investigated and, if confirmed, lead to dismissal as permitted by law and, potentially, legal prosecution.

During work events, you may consume reasonable amounts of alcohol if served. You are personally responsible for making sure that your consumption does not prevent you from safely returning home after the event.

If you use company branded clothing or cars, you must not consume alcohol or drugs while wearing the Verisure branded clothing or using the car.



## Strict non-tolerance of violence

As part of our commitment to provide a safe work environment, we never engage in or tolerate any form of violence in the work place.

This includes threats or acts of violence, intimidation or attempts to create fear in others. As with all other cases of non-compliance with this Code of Conduct, you are obliged to speak up about any suspected incidents. If you believe someone is in immediate danger, contact security or enforcement authorities.

Anyone who engages in activities that may jeopardize their own safety and that of others will be subject to disciplinary action, up to and including termination.

Always contact your Manager or a representative from HR in case of questions or concerns.

### DON'T DO THIS

- Drive while tired or under the influence of alcohol or drugs
- Use your phone while driving
- Use alcohol or drugs during working time, even when working from home
- Use violence or violent body language in any form

### DO THIS

- Comply with all internal safety rules relating to occupational hazards
- Respect all traffic rules
- Report any accident, or unsafe situation immediately



## 5. Protecting our customers

### 5.1 Quality of products and services

We are committed to providing safe, high-quality products and services compliant with applicable laws and regulations. Our interactions with customers should at all times be respectful and reflect the With Trust and Responsibility tenet of our DNA. You are therefore expected to behave politely and with integrity in all your interactions with customers. This means – among other things – that you must not:

- Take photos of customers or their homes
- Accept food or alcoholic drinks from customers
- Accept tips or gifts from customers
- Charge customers prices outside the agreed negotiation margins that are set per package
- Contact customers for other reasons than business nor more frequently than required to deliver our service
- Make comments about customers to anyone at Verisure (other than required for professional purposes), friends, family or on social media

If you have any concerns about the products or service quality we develop or deliver, or the way they are communicated to our customers, raise these with your Manager or a representative from the function concerned. We count on you to make sure we keep our commitments to our customers and earn our trust with them at every interaction.

### 5.2 Protecting customer data

Customers give us access to their personal data so that we can provide them with protection. Personal data is data concerning an individual, such as name, address, telephone number, date of birth, ID number, email address, photos and video footage, employment history, etc. It is everyone's responsibility to handle this data in strict compliance with applicable laws and our internal rules. This means you must:

- Only collect the personal data that is strictly necessary for specified and legitimate business purposes and process them in a manner that is compatible with those purposes.
- At all times follow the rules, guidance and processes established by the Company for the handling, storage, and use of personal data.
- Ensure the protection of personal data against unauthorized access and accidental loss, destruction or damage

- Immediately report when documents or devices containing personal data are lost or stolen
- Update or delete any inaccurate, outdated or incorrect personal data without undue delay according to Company instructions

For more information, please refer to our Group Privacy Policy.

Always contact the country Data Privacy Officer (DPO) or Group DPO (DPO@verisure.com) in case of questions or concerns.

### DON'T DO THIS

- Take photos of customers or customers' homes
- Make comments about customers or customers' homes to each other (other than for strictly professional purposes), friends or on social media
- Process or manipulate personal data in a way that is not consistent with the purposes for which it was provided or without authorization
- Contact customers who have asked us not to contact them

### DO THIS

- Always respect our customers' privacy and safeguard their personal data
- Be clear when speaking to customers about their personal data according to Company instruction
- Regularly look at the data you hold to see if it needs to be deleted or modified, and try your best to ensure it is accurate and up to date
- Only use customer data for the purposes for which it was provided
- Contact your local DPO or Legal if you have questions
- Report immediately if personal data is lost or stolen



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### **5.3 Customer contracts**

We pay particular attention to ensure the quality of our customer contracts. We must comply with the obligations set out in the contracts and grant customers the rights they are entitled to under the contract.

Make sure you understand the rights and obligations in our contracts and comply strictly with these rights and obligations in all your interactions with customers.

Always contact your Manager or a representative from Legal in case of questions or concerns.

### **5.4 Compliance with regulations intended to protect customers**

As a prominent player in the private security business, we are committed to fully comply with all regulations governing our services.

You must understand and respect regulations applied to the private security industry in the country where you work and collaborate with national law enforcement officials as stipulated in these regulations.

You must also understand and comply with any other regulations, especially those intended to protect customers, that apply to our products and services.

Always contact your Manager or a representative from Legal in case of questions or concerns.

### **5.5 Responsible marketing and sales**

We compete vigorously and effectively, but never unlawfully. We win and retain customers through making sure our advertising materials and other representations we make are accurate, truthful and in compliance with all relevant laws.

When communicating with consumers – virtually or in person – you must remain accurate, truthful and compliant with laws and internal rules. Any product or services claim must be substantiated. Additionally, when communicating with a customer, you must always identify yourself as a Verisure representative and explain the purpose of your contact.

Any usage of social media for marketing or sales purposes must be done in line with the Group Social Media Guidelines in this Code of Conduct.

Always contact your Manager or a representative from Legal in case of questions or concerns.



## 5.6 Ensuring the integrity of our colleagues

We take our commitment to provide safety and security to our customers very seriously. That is why we are increasingly asking you to provide us with locally relevant proof of a clean criminal record where legally permissible. This is vital if we are to live up to our commitment to protect our customers.

Always contact your manager or a representative of HR or Legal in case of questions or concerns.

## 5.7 Customer security is everyone's responsibility

Our promise of peace of mind and security to our customers is directly related to the integrity and security of the tools, practices, and technologies by which we provide our services.

You are responsible for maintaining a reasonable level of security awareness for completing all mandatory training as advised. You should understand and comply with all Group Information Security Policies and report suspected incidents promptly.

For more information, please refer to the Group Information Security Policy or contact your Regional Security Team.



## 6. Protecting our company

### 6.1 Protection of company assets and accounting against fraud

We insist on honesty and respect for Company assets.

You must never engage in fraudulent or any other dishonest conduct involving the assets or the financial reporting of Verisure or any third party. Any such conduct may not only result in disciplinary sanctions, but also in criminal charges.

Verisure's financial records are the basis for managing the Company's business and fulfilling its obligations to the relevant stakeholders. Therefore, any financial record must be accurate and in line with Verisure's accounting standards.

You must safeguard and make only proper and efficient use of Verisure's assets. You must also seek to protect Verisure's assets from loss, damage, misuse, theft, fraud, embezzlement and destruction. These obligations cover both tangible and intangible assets, including our alarm devices, trademarks, knowhow, confidential or proprietary information, and information systems.

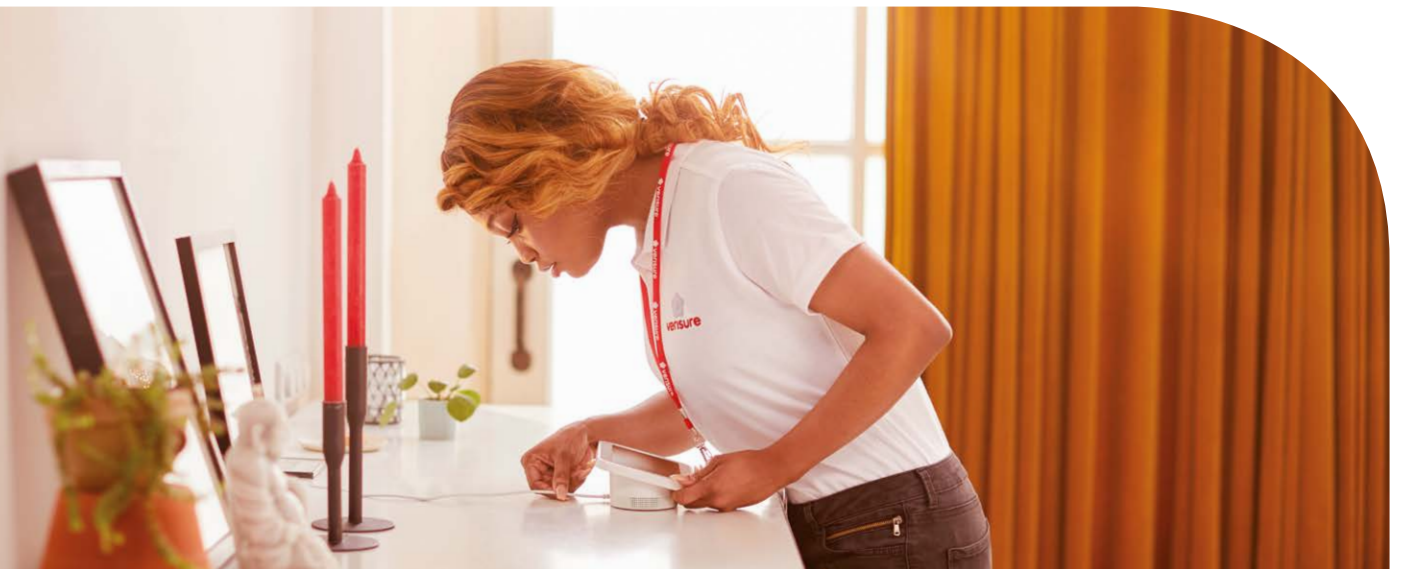
For more information, please refer to our Group Financial Policy and related guidelines, Group Information Security Policy and Group Acceptable Use of IT Resources Policy.

Always contact your Manager or a representative from Finance or IT in case of questions or concerns.

### 6.2 Anti-bribery and corruption

We condemn any form of bribery and corruption in business operations, regardless of where it takes place.

You must apply strict caution when giving or accepting gifts or entertainment involving external stakeholder (suppliers, government officials, lobbyists, etc.), as it may appear as an attempt to improperly influence these stakeholders or to limit your ability to make an objective business decision. All gifts received must be declared to the appropriate director in line with local policy. Accepting or offering cash gifts is strictly prohibited.



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Business entertainment should only be reasonable, moderate and otherwise appropriate and given or accepted as part of legitimate business building activities. For business entertainment, the cost per head must be in line with locally accepted standards (e.g. the accepted price of a dinner as per local travel policy).

You must not accept or offer any type of payment or other benefit that may be perceived as influencing your objectivity or improperly seeking to influence a third party. This includes any bribes, illegal commissions or other types of dishonest payments, as well as payments to government officials to accelerate administrative procedures.

You must never solicit or accept any gifts, gratuities or other monetary incentives as a condition of doing business with a supplier.

Bribes and facilitation payments, or other activities putting your objectivity or the objectivity of third parties in influencing a business outcome in question, will be subject to disciplinary action and potentially also criminal charges.

For more information, please refer to the Anti-Bribery Policy.

Always contact your Manager or a representative from Legal in case of questions or concerns.

### **6.3 Conflict of interest**

We are all expected to use good judgment and act at all times in the best interest of the Company while performing our duties. You should avoid actual or apparent conflicts of interest. A conflict of interest exists when your personal interests interfere with the best interests of Verisure.

Outside of Verisure, you must not pursue activities that will interfere or conflict with your responsibilities at Verisure. Unless authorized upfront by a Group Management Team member, and the relevant Head of HR, you cannot accept or fulfil a position as board member, officer, employee, partner or consultant for organizations other than Verisure. Authorization will be withheld if the position or activity is likely to conflict with your responsibilities or Verisure's interest.

Unless requested by Verisure to take up a particular position or activity, you will pursue outside activities and positions at your own risk and cost, and within your personal time only.

You must not engage – directly or indirectly – in or seek to influence commercial deals with an actual or potential supplier of Verisure if you have a relationship with that supplier that puts you in an actual or apparent conflict of interest.

Immediate family members and partners of anyone working at Verisure may be hired for or provide consultancy to Verisure only if the appointment is based on qualifications, performance, skills and experience and provided that there is no direct or indirect reporting relationship between that individual and their relative or partner. These principles of fair employment will apply to all aspects of the employment, including compensation, promotions and transfers.

It is considered a conflict of interest to enter into a supervisory relationship with anyone you are related to or are in a relationship with.

An actual or apparent conflict of interest may also arise from your personal relationship with a customer, supplier, vendor, competitor or business partner, if that relationship might be seen to impair your objective business judgment.

Should you have any potential conflicts of interest, you should inform your Manager and / or representative in HR, so that the situation can be documented, and appropriate preventative actions can be taken. Failing to notify Verisure of a potential conflict of interest will be considered a serious breach of the Code of Conduct and may have consequences up to and including termination.

Always contact your Manager or a representative from HR or Legal in case of questions or concerns.

### **DON'T DO THIS**

- Work for any competitors of Verisure while you are working here
- Work for companies that are not competitors of Verisure outside your working hours without the required approval
- Provide advice or services to a supplier of Verisure
- Influence hiring so that a relative is employed
- Make undisclosed personal investments in a supplier, commercial partner or competitor
- Have a supervisory relationship with a relative or someone with whom you have an intimate relationship

### **DO THIS**

- If you have commercial relationships with relatives, spouses, friends or other people close to you that could lead to a conflict of interest, inform your manager and / or HR
- Likewise, intimate relationships between colleagues can, depending on their duties and their respective positions, create a conflict of interests. If you find yourself in such a situation, you should tell your Manager and / or HR, so the proper steps can be taken to eliminate the conflict
- If a reported potential conflict of interest situation persists, renew your reporting thereof at least every two years unless it is anyway obvious within the Company

## **6.4 Fairness in business**

We recognize and support the importance of vigorous yet fair competition. Our Company will grow through the quality of our products, services and people, never through unlawful business practices. We act at all times in accordance with all the relevant competition laws. Competition laws are in place to ensure unhampered free competition, which in turn ensures that our customers can obtain products and services of high quality at fair prices.

While competition laws can differ across countries, the same key principles must be followed where ever you are. Based on these principles, you must at all times adhere to the following non-exhaustive list of rules:

- Commercial policy and prices must be set independently and should never be agreed, formally or informally, or coordinated with competitors or other non-related parties, whether directly or indirectly
- Customers, territories or service segments must never be discussed nor allocated between Verisure and its competitors but must always be subject to fair competition
- Competitively sensitive information (e.g. prices, selling conditions, customers, suppliers, marketing plans, product development plans, etc.) must not be shared with or received from competitors. If inadvertently received, contact Legal for advice
- In particular, some conduct may be considered unfair or illegal in certain circumstances, including:
  - Using market power to gain an unfair competitive advantage
  - Entering into agreements with suppliers or sales partners that impose exclusivity obligations
  - Requiring customers to buy one product to get access to another product

For more information, please refer to our Fair Competition Policy.

Always involve a representative from Legal before any calls or meetings with competitors for advice and always contact Legal in case of questions or doubts.



## 6.5 Treatment of confidential information, intellectual property and unsolicited information

### Confidential Information

As part of our roles, we often have access to confidential information owned by Verisure and sometimes also to confidential information owned by third parties, such as suppliers or customers. Confidential information may include financial information, business plans, technical information, information about customers, and other types of information that are not known to the general public or to competitors. You have a duty to protect confidential information as well as confidential relationships between the Company and its customers, suppliers, shareholders and others. This obligation continues after leaving Verisure.

You must never disclose or discuss confidential information with people outside the Company, including family members or friends. Additionally, confidential information should only be provided to or discussed with other colleagues if there is a valid business reason, or with third parties who have a legally binding obligation to keep the information confidential and a clear business need to receive the information.

If you have relatives or other people you know who work for competitors, business customers, suppliers or partners, you must take additional care in protecting Verisure's confidential information and you must not request confidential information from them.

It is important that you never discuss confidential information in places where you can be overheard, such as airports, restaurants, open spaces, etc. It is also your obligation to make sure that no confidential information is left unattended on desks, screens, external data storage devices, etc.



For more information, please refer to our Group Privacy Policy and Group Information Security Policy.

Always contact a representative from Information Security or Legal in case of doubts.

### **Intellectual Property**

Our Intellectual Property, including patents, trademarks, copyrights, trade secrets, inventions and technology, is one of our most valuable assets. You may not allow Verisure's Intellectual Property to be used or shared with third parties without the appropriate authorization and protections in place.

You are expected to respect the Intellectual and Industrial Property rights of third parties. Always contact a representative from Legal in case of doubts.

### **Unsolicited Information**

You should only accept or consider unsolicited ideas from third parties, including ideas for new advertising campaigns, new promotions, new or improved products or technologies, marketing plans or new product names if it is in strict compliance with the Company's procedures for unsolicited ideas. For any other unsolicited idea you receive, please immediately inform a representative from Legal so that a response can be prepared and further action taken. For more information, please refer to your contact in Legal or Group IT Counsel.

## **6.6 Image and reputation**

Our image and reputation are critically important. All measures should be taken to protect and safeguard our image and reputation in all our dealings with each other, customers, suppliers, business partners, competitors and government officials.

You should not speak on behalf of Verisure unless explicitly authorized to do so.

You may interact with authorities, semi-state organisations or public institutions and bodies, if authorized to do so as part of your role. When you do, you are expected to behave in a lawful, ethical and respectful manner.

#### **DON'T DO THIS**

- Make comments on behalf of Verisure to the media before consulting Communications
- Make any statement in any external context that could have a negative impact on Verisure's reputation or trademark

#### **DO THIS**

- Remember that you are a representative of Verisure when you use the Company's uniforms or vehicles; therefore, always behave responsibly when using them

## 6.7 Acceptable use of IT, information security and responsibility to report incidents

You must use all IT equipment and systems in accordance with the Group Information Security Policy and the Group Acceptable Use of IT Resources Policy. It is your responsibility to help us safeguard our technologies, computer systems and applications as well as the data stored on them from damage, alteration, theft, malware, fraud and unauthorized access.

As such you are expected to:

- Maintain a reasonable level of security awareness and complete all mandatory training as required
- Understand and comply with Information Security Policies, communications, and guidance
- Ensure that your use of IT complies with the Group Acceptable Use of IT Resources Policy
- Never attempt to circumvent the Company's security controls or protections

To the extent permitted under applicable law, Verisure reserves the right to monitor and inspect how its networks and assets are used, including inspection of e-mail and other data kept on Company devices.

If you are victim, or suspicious of, a security incident which might affect the Company or your colleagues, always immediately report the activity to your Local Service Desk, Regional Security Team, or Manager.

## 6.8 Social media

We recognize that technology provides unique opportunities to build our business, listen, learn and engage with customers, stakeholders and each other through a wide variety of social media. It brings unique opportunities to connect and communicate, with the potential of building our brand and reputation.

On the flip side, ill-considered use of social media can also greatly damage our brand and reputation.





You should be mindful that your postings on social media, even if done in a private capacity, can impact the Verisure brand and expose the Company to legal risk. In view of this, we expect that you at all times:

- Be truthful and accurate in your description of the Company, our products and services
- Disclose your affiliation with the Company when making comments about Verisure
- Respect the privacy of our customers and never post any image or comments about them or their homes
- Refrain from all derogatory, offensive or inappropriate comments concerning Verisure, our brands, our colleagues, our customers, our business partners or even our competitors
- Refrain from speaking on behalf of the Company unless authorized to do so
- Refrain from infringing third party image rights, trademarks or copyright

For more information please refer to the applicable social media standards or to your contact in Marketing or Communications.

Always contact your Manager, HR, or Legal in case of concerns or questions.

### **DON'T DO THIS**

- Make any reference to your job or your relationship with Verisure in any personal communication, in such a way that the reference might be interpreted, even mistakenly, as being a remark made by Verisure or approved by Verisure

### **DO THIS**

- If you use social media for your job, make sure any posts you make in social media about Verisure are in line with the Code of Conduct and the Social Media Guidelines
- Make sure you disclose clearly that you work at Verisure when posting about Verisure



## 7. Governance

The Functional and Country Heads are responsible for ensuring that sufficient resources and attention are given to an effective implementation of the Code of Conduct within their respective teams and geographies.

Country Compliance Committees are responsible for ensuring the implementation of the Code of Conduct in their respective geographies. Further, they are responsible for continuously building a do-the-right-thing culture within their organization, ensuring that the appropriate processes are in place and followed to address and follow up on compliance concerns, evaluating the implementation of the Code of Conduct on an annual basis and reporting annually to the Group Compliance Committee on the implementation and areas for improvement. The Compliance Committees will typically consist of the Head of the Country, Head of HR and Head of Legal.

Approved by the Group Board, December 2018 (as updated in November 2021).







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