



Group Anti-Facilitation of Tax Evasion Policy

December 2022

Executive Summary

Tax Evasion, and the deliberate and dishonest facilitation of Tax Evasion by another person, are criminal offences. The purpose of this Policy is to prevent the facilitation of Tax Evasion by Third Parties we deal with. It provides information and guidance to all Verisure colleagues and others working with us on how to recognise and prevent the facilitation of Tax Evasion. The Policy also stresses the importance of respecting all laws relevant to countering Tax Evasion in the jurisdictions in which we operate, including the UK Criminal Finances Act 2017.

Issuing Department: Group Tax

Owner: Group CFO

Version: 1.0



Introduction

We are committed to acting professionally, fairly and with integrity in all of our business dealings and relationships wherever we operate. It is Verisure's DNA to always act with trust and responsibility. As such, we are committed to raising awareness around, and implementing and enforcing effective systems to counter the facilitation of Tax Evasion.

In many jurisdictions, we can face criminal and other sanctions, including fines, for any facilitation of Tax Evasion. Additionally, any facilitation of Tax Evasion by our Company could also severely damage our reputation. We therefore take our legal responsibilities seriously and have a zero tolerance to any facilitation of Tax Evasion within Verisure.

This Policy is intended to help raise awareness of the key principles to follow in our day-to-day operations and when to seek guidance. It is important that we all understand and closely follow the principles of this Policy.

Defined words are capitalised.

Key Principles

Do not facilitate Tax Evasion	We do not knowingly engage in or agree to practices that facilitate Tax Evasion.
Know our vendors and other Third Parties we deal with	We must know our vendors and other Third Parties we deal with as part of our operations. We have the responsibility to conduct adequate due diligences with regard to them and to contract with them applying terms helping to prevent Tax Evasion.
Recognise and report any Third Party requests that raise red flags from a Tax Evasion perspective	We must all recognise the red flags that raise suspicions that a Third Party is intending to engage or is engaging in Tax Evasion. Any such potential red flags, or any other situations or action that raise suspicion about Tax Evasion, should be reported immediately either to your Manager or directly to Group Tax for assessment.
Speak Up in case of concerns	If you become aware of any person within Verisure who is part of facilitating Tax Evasion by a Third Party, you have the responsibility of Speaking Up following the principles of our Group Speak Up Policy.

Who Must Follow This Policy

This Policy applies to all colleagues, suppliers, contractors, directors and officers of Verisure.

Questions and Support

Please ask Group Tax if you have any questions related to anti-facilitation of Tax Evasion.

Policy Requirements

Do not facilitate tax evasion

Tax Evasion involves deliberate and dishonest conduct and is in that regard different from tax avoidance or tax planning. Tax Evasion and the facilitation of Tax Evasion are illegal. The deliberate and dishonest facilitation of Tax Evasion is even criminal in several jurisdictions. **We do not knowingly engage in or agree to practices that facilitate Tax Evasion.** We refuse to agree to terms that could help facilitate Tax Evasion or deal with Third Parties we have reason to believe are involved in Tax Evasion. We do not tolerate any form of Tax Evasion and strive to prevent such situations from arising by implementing adequate measures and by raising awareness.

Know our vendors and other Third Parties we deal with

Vendors who do not comply with regulatory standards can lead to us having to pay fines, undergo penalties, and perhaps face legal prosecution. Additionally, the vendors you choose are ultimately extensions of Verisure. Any reputational risks from unvetted vendors will pass on to us. We must always follow our Group Procurement Policy to ensure we meet this requirement.

Recognise and report any Third Party request that raise red flags from a Tax Evasion perspective

From dealing with vendors or other partners, to dealing with their expense claims, there are many ways we may inadvertently find ourselves in situations where there is a risk of Tax Evasion occurring.

The following is a list of possible red flags that may arise and which should raise concerns related to Tax Evasion. The list is not intended to be exhaustive and is for illustrative purposes only:

- (a) a Third Party has made or intends to make a false statement relating to tax, has failed to disclose income or gains to, or to register with, any competent authorities, has delivered or intends to deliver a false document relating to tax, or has set up or intends to set up a structure to try to hide income, gains or assets from a tax authority.
- (b) a Third Party has deliberately failed to register for VAT (or the equivalent tax in any relevant non-EU jurisdiction) or failed to account for VAT;
- (c) a Third Party requests payment in cash and/or refuses to sign an agreement, or to provide an invoice or receipt for a payment made;



- (d) someone working with us as a colleague who asks to be treated as a self-employed contractor, but without any material changes to his/her working conditions;
- (e) a Third Party requests that payment is made to a country or geographic location different from where the Third Party resides or conducts business;
- (f) a Third Party, to whom we have provided services, requests that their invoice is addressed to a different entity, where we did not provide services to such entity directly;
- (g) a Third Party, to whom we have provided services, asks us to change the description of services rendered on an invoice in a way that seems designed to obscure the nature of the services provided;
- (h) a Third Party submits an invoice that appears to be non-standard or customised;
- (i) a Third Party insists on the use of side letters or refuses to put terms agreed in writing or asks for contracts or other documentation to be backdated;
- (j) a Third Party invoices for a commission or fee payment that appears too large or too small, given the service stated to have been provided; or
- (k) a Third Party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us.

If you encounter any of these or other red flags, report them immediately either to your Manager or directly to Group Tax for assessment.

Speaking Up in case of concerns

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.

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 platform will be shared with the CLO or the Group Tax Director at Verisure, as per the Group Speak Up Policy and related implementing guidelines.

Internal training and communication to Third Parties

We will follow and make available training on non-facilitation of Tax Evasion, as relevant. Such training may form part of a wider financial crime detection and prevention training.

Our zero tolerance to Tax Evasion must be communicated to our vendors and other Third Parties with whom we contract, as part of our Procurement process or separately.



Monitoring and Review

We monitor and review our preventative procedures and make improvements, as relevant. All colleagues are invited to comment on this Policy and our other practices, and suggest ways in which they might be improved, to the Group Tax Director.

Key Responsibilities

Responsible	Description
Everyone	Must comply with this Policy and Speak Up in case of questions, doubt or concern.
Group Board	Provides oversight of the program ensuring that the facilitation of Tax Evasion risks are identified, understood, effectively managed, and oversees the development of an anti-Tax Evasion culture across the Group.
Group Chief Legal Officer (CLO) and Group Tax Director	The Group Tax Director should be involved in any tax proceeding and investigation procedure relating to anti-facilitation of Tax Evasion law infringements. All incidents that risk involving facilitation of Tax Evasion must be reported immediately to the CLO and the Group Tax Director.

Definitions

Group / Verisure	Verisure Topholding Group AB and its direct and indirect subsidiaries.
Tax / Taxes	Any net income, capital gains, gross income, gross receipts, sales, use, transfer, ad valorem, franchise, profits, license, capital, withholding, payroll, employment, property, alternative, value added, or other tax imposed by any governmental authority, or any interest or any penalties incurred under laws with respect to such taxes.
Tax Evasion	A deliberate effort not to pay Tax, and the deliberate and dishonest facilitation of Tax Evasion by another person. These are established criminal offences.
Third Party	Any individual or organisation you come into contact with during the course of your work. This includes actual and potential customers, suppliers, partners, distributors, business contacts, agents, advisers, and government and public bodies, including their advisers, representatives and officials, politicians and political parties.



Version Control

Version History

Version	Effective Date	Description of Change	Status	Author	Approval Trail
V1	Dec-22	First issue	Final	Group Legal	Group Board on 14.12.2022