

# CODE OF CONDUCT

A CODE OF ETHICAL BUSINESS CONDUCT



**WITH TRUST &  
RESPONSIBILITY**

# Content Index

<b>1. INTRODUCTION</b>	<b>4</b>	<b>4. PROTECTING OUR CUSTOMERS</b>	<b>18</b>
1.1. Our vision, mission, and DNA	5	4.1. Responsible marketing, sales and service delivery	19
1.2. Purpose of the Code of Conduct	6	4.2. Protecting customer data	20
1.3. Scope of the Code of Conduct	6	4.3. Customer contracts	21
<b>2. RESPONSIBILITIES</b>	<b>7</b>	4.4. Quality of products and services and compliance with security and product regulations	22
2.1. Responsibility to understand, comply, and seek clarity in case of questions	8	4.5. Ensuring the integrity of our people	22
2.2. Responsibility to speak up	9	4.6. Customer security is everyone's responsibility	23
2.3. Responsibility to apply strict non-retaliation	10	<b>5. PROTECTING OUR COMPANY</b>	<b>24</b>
2.4. Responsibility as a manager	10	5.1. Protection of company assets and accounting against fraud	25
2.5. Responsibility to respect Human Rights and Labour Standards in our Company and through our value chain	11	5.2. Anti-bribery and corruption	26
<b>3. PROTECTING OUR COLLEAGUES</b>	<b>13</b>	5.3. Conflict of interest	27
3.1. Non-discrimination & anti-harassment	14	5.4. Treatment of confidential information, intellectual property, and unsolicited information	29
3.2. Personal data of our colleagues	15	5.5. Image and reputation	30
3.3. Health, safety, and well-being	16	5.6. Acceptable use of IT, Artificial Intelligence (AI), information security, and responsibility to report incidents	31
		5.7. Social media	31
		<b>7. PROTECTING OUR COMMUNITIES AND OUR PLANET</b>	<b>33</b>
		<b>8. GOVERNANCE</b>	<b>35</b>



# Message from our CEO

Dear colleagues,

When your mission is to give peace of mind and protect people, trust is everything. We promise our customers we will keep them safe and secure, and that means striving to work to the highest possible ethical standards.

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

As a company, we are committed to doing the right thing, always. Our Code of Conduct sets out what this means. It's based on the values of our DNA, and it helps us all to do the right thing so we can meet the expectations of our customers, colleagues, business partners, investors and other key stakeholders.

Our DNA is explicit in our values that guide all our actions: Our passion in everything we do is recognised 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 value of our DNA is 'With Trust and Responsibility', towards one another, our customers, and our other key stakeholders. Living this core value every day is critical in earning and continuing to build the trust that forms the basis of our continued success.

Our vision is to be the number one security company in the world. We can only achieve that by acting with integrity and delivering every aspect of our business with Trust and Responsibility. Our Code of Conduct is clear on what that means. I count on you to read, understand and follow it, every day.



**Austin Lally**

Group Chief Executive Officer at Verisure

***'Our customers trust us with what matters most to them. And they count on us to deliver every aspect of our business with Trust and Responsibility.'***

1



# INTRODUCTION

# Introduction

1.1

## 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.





As part of our Company purpose, mission, and DNA values, we are also committed to driving our sustainability and ESG - Environmental, Social and Governance- strategy, which is built around five key pillars:

- Ethics and Integrity: Doing the Right Thing and acting with Trust and Responsibility at all times
- Our Customers: Dedicated to offering Best-in-Class Protection to our customers
- Our People: The foundation of our success
- Our Communities: Actively having a positive impact in the communities we serve
- Our Planet: Minimising our environmental impact and protecting our planet to the widest extent possible.



1.2

## Purpose of the Code of Conduct

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

1.3

## Scope of the Code of Conduct

The Code of Conduct applies to our entire organisation, including our directors, managers and other colleagues as well as subcontractors, and other collaborators. Everyone in the organisation is expected to understand and comply with our Code of Conduct.

The Code of Conduct forms part of the terms of work, either through the terms of employment, service or other type of work agreement, always in compliance with local legislation. The Code of Conduct is globally applicable and implemented in line with local laws to the widest possible extent. To the extent the Code of Conduct conflicts with local law, local law will always prevail.





2



**RESPONSIBILITIES**



# Responsibilities

2.1

## 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 the laws of the country in which you work. Compliance with the Code of Conduct and applicable laws must never be compromised, no matter the short-term gain. The Company provides training and guidance to help you to understand the Code of Conduct. If you have any questions, please contact your manager or HR representative.

Additionally, you must follow our other internal rules, e.g., policies and standards, as they apply in each 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 feel uncomfortable 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!



2.2

## Responsibility to speak up

### Addressing your concerns and speaking up

Verisure is committed to acting in accordance with high ethical standards in its business conduct.

If you suspect or witness a violation of our Code of Conduct, or any other applicable laws or regulations, you should speak up. We encourage you to raise your concern directly with your manager or your local HR contact, as they are often the best positioned to assist. If you consider it appropriate in view of the nature of the matter, you can also raise the matter with Legal or with senior managers in the organisation.

In case you don't feel comfortable raising your concern within your organisation, you can use the dedicated Group Speak Up Platform to report your concerns, including anonymously, by sending a report through [verisurespeakup.com](https://verisurespeakup.com). Reports raised through our Speak Up Platform will be reviewed by members of the Group HR and Legal / Compliance teams and, if an investigation is opened, it will be investigated by an appointed Case Manager.

We will investigate any good faith concerns promptly and thoroughly. We take any concern seriously and make every effort to ensure our Code of Conduct is followed at all times. Our people are the foundation of our success, and this Code includes all the standards for everything we do as a team. Substantiated violations of the Code of Conduct, other internal rules or applicable laws will 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.





2.3

## Responsibility to apply strict non-retaliation

We recognise 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 facing negative repercussions for the following:

- Refusing to engage in any action that goes against our
  - Code of Conduct, internal rules, or the law, even if it may result in a short-term loss for Verisure
- Reporting a concern in good faith about possible
  - misconduct or assisting in 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.

2.4

## Responsibility as a manager

Everyone in the organisation is responsible for living our DNA and following the Code of Conduct in their day-to-day work and decisions. As a manager, you have the additional responsibility to demonstrate our DNA through your actions. It is also your responsibility to ensure that the activities under your authority comply with the Code of Conduct and applicable laws. You are also responsible for role modelling the expected behaviour for your team.

Leading by example includes 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. You should demonstrate that acting With Trust and Responsibility is always the right course of action. You also have the responsibility to actively role-model our Diversity, Equity, Inclusion & Belonging (DEIB) principles. In this regard, the way we do things is as important as what we accomplish.

As a manager, 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.



2.5

## Responsibility to respect Human Rights and Labour Standards in our Company and through our value chain

Verisure upholds Human Rights and Labour Standards internally and throughout its value chain, adhering to:

- The United Nations Global Compact's 10 principles, the Guiding Principles on Business and Human Rights, the Sustainable Development Goals (SDGs)
- The Organisation for Economic Co-operation and Development (OECD) Guidelines
- The International Labour Organisation defined tools with the Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy and other conventions which provide guidance founded on principles contained in international labour standards.

We recognise Human Rights as intrinsic standards that protect individual dignity and equality beyond legal obligations. Everyone in the Company is expected to act With Trust & Responsibility and to ensure there is no forced or child labour, human trafficking, modern slavery, or discrimination in our operations.

We all have a responsibility to respect the relevant labour laws that apply to our roles within the Company. This includes ensuring freedom of association, upholding collective bargaining rights, and supporting constructive dialogue with trade unions. You must not participate in any form of discrimination, harassment, or violence, particularly related to legitimate union activities or membership.

Through our value chain, we are committed to partnering only with those who respect laws and share our values of human and labour rights, ethics, health & safety and environmental protection, in line with UNGC principles - including anti-slavery, human trafficking, forced or child labour, non-discrimination, anti-harassment legislation and freedom of association.

If you have any concerns about a potential violation of human rights or labour standards, you must immediately report your concern.



For more information on our responsibilities regarding contracting with third parties from an ethical, legal, and socially responsible perspective, please consult our Supplier Standard & Ethical Code.





3



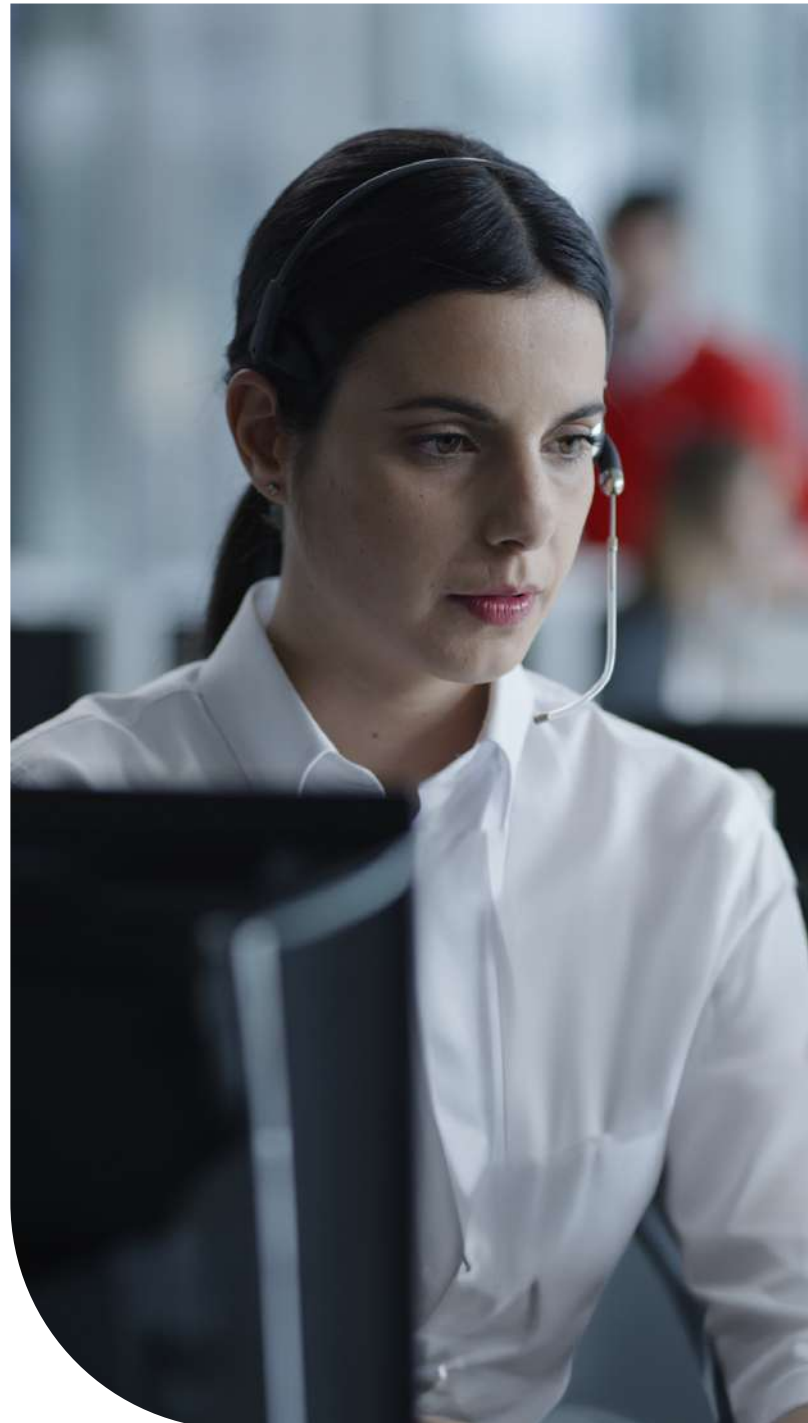
**PROTECTING  
OUR COLLEAGUES**



# 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 to 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, sharing their identity and uniqueness within our organisation and having access to the same opportunities, every step of the way. We also want to be representative of the societies in which we operate around the world. It's fundamental to the way we attract talent, welcome new colleagues, reward and develop our people, and how we help them reach their full potential. In light of our commitments to Diversity, Equity, Inclusion and Belonging, we count on you to contribute to the creation of a safe and inclusive culture, avoid any type of bias, and help other colleagues feel their unique identity is accepted within our Company.





**3.1**

## **Non-discrimination & anti-harassment**

We do not tolerate any type of discrimination or any form of physical or psychological harassment.

### **What is discrimination and what is harassment?**

**Discrimination** is any unjust or prejudicial treatment of people on the grounds of, among others, characteristics like gender, racial or ethnic origin, age, national origin, religion or belief, sexual orientation, gender identity or expression, marital status or disability.

**Harassment** is a 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.

### **How to react if you experience or witness any discriminatory or harassing behaviour?**

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, or raise your concern through the Group Speak Up platform

### **Do this**

- ✓ Treat everyone with respect
- ✓ Recognise that our different and unique backgrounds mean we can better serve our customers
- ✓ Be mindful of diverse backgrounds when interacting with your colleagues and customers
- ✓ Speak up if you witness discrimination or harassment.



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 anyone
- ✗ Request sexual favours
- ✗ Engage in unwanted flirting or make sexually charged comments
- ✗ Ask someone on a date after you have already been declined or ignored
- ✗ Make unwanted bodily contact
- ✗ Show or circulate any type of offensive material (for example, racist comments, sexual images, or cartoons)
- ✗ Make degrading comments about someone's 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.

3.2

## Personal data of our colleagues

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



For more information, please refer to our Group Privacy Policy and Group Personal Data Breach Standard.



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





**3.3**

## Health & safety and well-being

We are committed to protecting the health and safety of our colleagues and fostering their well-being.

We count on you to support and promote a culture of safety within our organisation, and to raise any concerns on safety hazards or unsafe work practices through the available channels. It is everyone's responsibility to comply with internal safety rules and report any accident or unsafe work practices or situations immediately.

### Use of company cars and road safety

We take road safety very seriously. To the extent permissible under applicable laws, we conduct driving license checks or require proof of valid driving license whenever it is a requirement for one of our positions. If you were asked to provide driver's license information when joining or changing roles within the Company, we expect you to inform your manager and the HR Department if there is a change in your driving license status during your employment to comply with local laws.

Misuse of Company cars or violation of road safety policies will result in disciplinary action.

### Do this

- ✓ Comply with applicable traffic regulations, including speed limits and regulations for parking and using your phone while driving
- ✓ Plan your route ahead of time for any work-related trip. Consider potential risks such as weather conditions, road closures, and how long the journey will take
- ✓ Report any concerns you may have about your Company vehicle immediately to the designated department, so vehicle maintenance can be carried out if needed
- ✓ If you have a Company car, ensure all required vehicle maintenance is carried out in accordance with local Company policy
- ✓ Please report any road accidents or traffic misconduct involving a colleague immediately to the designated department. This helps us investigate the root causes, take corrective actions, and prevent future incidents.

We also encourage you to take care of your own well-being by taking the time to maintain your physical and mental health. Verisure continues to respect the working time directive aimed at safeguarding proper rest periods and promoting an appropriate work-life balance.

Anyone who engages in activities that may jeopardise their 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

- ✗ Drink alcohol or consume drugs or any other substance that may impact your ability to drive or get into a car with a driver who has been drinking or using drugs. Colleagues found driving under the influence of alcohol or drugs will be subject to disciplinary action and might be reported to the authorities
- ✗ Use your phone while driving, even if you use a hands-free option such as earphones, a headset or a helmet. If you need to use your phone, pull over safely, use it, and then continue your trip
- ✗ Let yourself become distracted while driving, even in slow or stopped traffic. Eating, changing clothes, or putting on makeup while driving is dangerous
- ✗ Let your emotions get the best of you when in traffic. Even if another driver is annoying, avoid road rage
- ✗ Drive while tired. If you are going on a long drive, prioritise resting before your journey, and if necessary, find a safe spot to take a break. Remember that being tired or drowsy can slow down your reaction time and affect your ability to drive safely
- ✗ Forget to run a quick check on your car before driving. To the best of your ability, check that your tyres, oil level, battery, windshield wipers, brakes, and lights are in good condition before you set off, particularly before a long trip. If you have any concerns, reach out to the designated department.

## **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. In addition, you must not consume alcohol or drugs while wearing Verisure-branded clothing or operating a Company vehicle.

During work events, you may consume reasonable amounts of alcohol if served. Your behaviour must be appropriate and respectful towards colleagues and others at all times. You are personally responsible for ensuring that your alcohol consumption does not prevent you from safely returning home after the event, in compliance with the applicable legislation.

## **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 workplace.

This includes threats or acts of violence, intimidation, and 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, including the police.







# PROTECTING OUR CUSTOMERS

# Protecting our customers

**4.1**

## Responsible marketing, sales and service delivery

We are committed to responsibly marketing and selling our services. We aim to delight our current and prospective customers in all our interactions and consistently deliver high-quality services. While we compete vigorously and effectively to win and retain customers, we always do so in a fair and lawful manner.

Our interactions with customers must always be respectful and reflect the 'With Trust and Responsibility' value of our DNA. We must remain accurate, honest, and compliant with laws and internal standards in all our interactions. This includes interactions involving marketing, sales, installations, customer onboarding, alarm monitoring, and other customer services, as well as handling complaints or cancellation requests. Any product or service claim must be substantiated.


### Do this

- ✓ Reflect our customer-centricity in all your interactions
- ✓ Ensure you accurately and clearly provide all relevant information regarding our services and their related terms and conditions. Follow closely the applicable process for doing so
- ✓ If you are in a customer service role, make sure to address requests in a timely and respectful manner, following the relevant internal standards and processes
- ✓ If you are in contact with a customer who has expressed their unwillingness to receive further communication from our Company, please ensure to disclose this information to the appropriate team to respect their data privacy
- ✓ Follow the guidelines in this Code of Conduct for using social media for marketing or sales purposes. Refer to section 6.7, Social Media, for more details.

Every one of us has a responsibility to ensure that our customers have the best user experience possible. If your role involves interacting with our current or prospective customers (e.g. Marketing, Sales, or Customer Service), please adhere to the following standards at all times:

### Don't do this

- ✗ Exaggerate, mislead or use inaccurate information, or omit important information when interacting with customers as part of your role
- ✗ Divert from installation guidelines in terms of quantity or location of devices during the installation process
- ✗ Take photos of customers or their homes during the visit, accept food, alcoholic drinks, tips or gifts from customers
- ✗ Charge customers prices outside the agreed negotiation margins that are set per package
- ✗ Divert from internal processes intended for interactions with customers and contact customers for other reasons than business or contact them more frequently than required to deliver our products and services or as determined by the applicable process
- ✗ Make comments about customers to anyone at Verisure (other than required for professional purposes), friends, family or on social media.



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



4.2

## Protecting customer data

Our continued success depends on our ability to maintain the trust of our current customers and gain the trust of our prospective customers. They entrust us with their personal data and so we live up to their trust by collecting, storing, and using all data securely and responsibly.

### 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 instructions
- ✓ 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 collect and use personal data that is strictly necessary for specified and legitimate business purposes - i.e. acceptable, valid, proportionate, and limited - and, store, remove, and process them accordingly
- ✓ Follow the rules, guidance and processes established by the Company for the handling, storage, and use of personal data at all times
- ✓ Ensure the protection of personal data against unauthorised access and accidental loss, destruction or damage
- ✓ Immediately report any suspected potential personal data incident using the dedicated channels for doing so. This could include cases of unauthorised access to personal data, accidental loss of personal data, personal data sent to the wrong recipient, and the loss or theft of documents or devices containing personal data
- ✓ Act promptly in accordance with applicable policies when data subjects request to exercise their rights under applicable data protection laws. If you are unsure to whom the request should be forwarded, contact your local data protection officer
- ✓ Update or delete any inaccurate, outdated, or incorrect personal data without delay and according to Company instructions.

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. We take several measures to help protect personal data and to meet our legal obligations. In addition to these measures, it is everyone's responsibility to handle personal data in strict adherence to applicable laws and our internal standards. It is important that you understand what this means for your role and take responsibility for ongoing compliance, including the following for current customers, as well as for prospective customers when applicable:

### Don't do this

- ✗ Take photos of customers or their homes
- ✗ Make comments about customers or their homes to other colleagues (other than for strictly professional purposes), to 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 authorisation
- ✗ Contact customers who have asked us not to contact them.



For more information, please refer to our Group Privacy Policy and our Group Personal Data Breach Standard.



Always contact the country/cluster Data Privacy contact, and/or the Group Data Privacy Team (DPO@verisure.com) in case of questions or concerns.

4.3

## Customer contracts

We pay particular attention to ensuring 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.

### Do this

- ✓ Ensure you fully understand the customer contract and its terms
- ✓ Adhere to local guidelines for correct customer contracting, including the use of relevant contracts and the inclusion of all necessary information
- ✓ Maintain consistency in all written materials, discussions, and correspondence with current or prospective customers when describing the customer contract terms.

### Don't do this

- ✗ Convey any information to prospective or current customers that contradicts the customer contract
- ✗ Make statements or promises to customers that are not supported by the customer contract.



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





4.4

## Quality of products and services and compliance with security and product regulations

We are committed to providing safe, high-quality products and services compliant with applicable laws and regulations.

To the extent required by your role, you must understand and comply with laws and regulations applicable to:

- Our products and services, and the private security industry; and
- Our collaboration with national law enforcement officials and first responders as stipulated in these regulations.



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

4.5

## Ensuring the integrity of our people

We take our commitment to providing safety and security to our customers very seriously. That is why, where and when legally permissible, we are asking our colleagues to provide us with locally relevant proof of a clean criminal record. Additionally, and always in compliance with local laws, we expect you to share any changes to your criminal record or other background information specifically required for your position during your employment. This is vital if we are to live up to our commitment to protecting our customers.



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



4.6

## 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, devices, practices, and technologies we use to provide our services.

### Do this

- ✓ Participate in the security and IT resources training provided by the Company, including mandatory sessions, to maintain a good level of security awareness
- ✓ Only access current and prospective customer data you are authorised to access and with a valid business need
- ✓ Proactively inform your manager or IT if your profile settings should be amended based on your role. This includes reducing access rights if you have access to more customer data than you should due to incorrect profile settings
- ✓ Only handle current and prospective customer data on Verisure-approved devices (laptops, tablets, and other company-approved devices).

### Don't do this

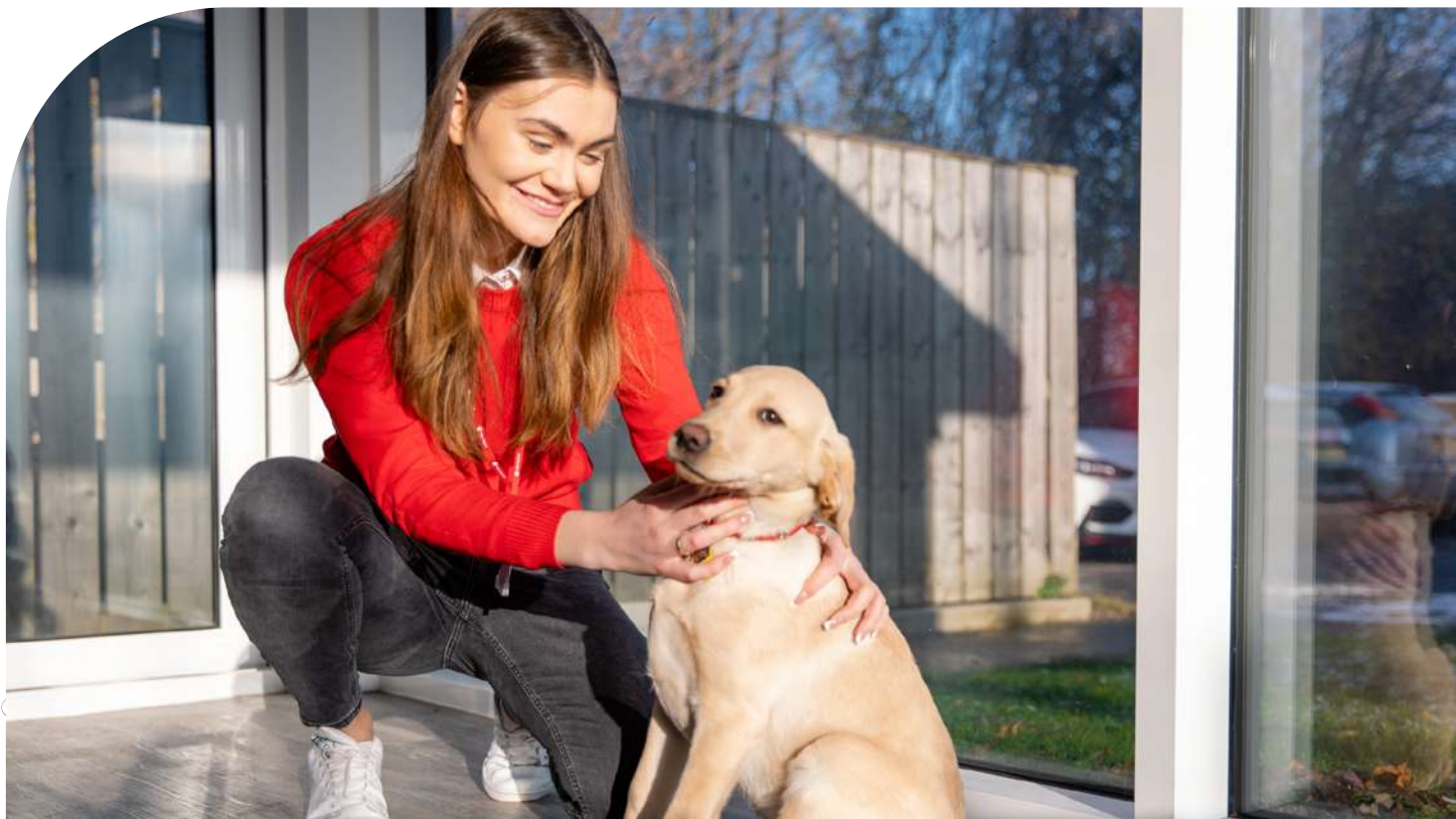
- ✗ Share current and prospective customer data with colleagues who do not have access through their profile settings, even if your intentions are good
- ✗ Provide current and prospective customer information to callers or emails if you cannot verify their identity
- ✗ Transfer or save any Verisure data, including customer data, to your personal email or devices that do not have Verisure security controls.



For more information, please refer to the Group Information Security Policy and the Group Acceptable Use of IT Resources Policy.



Contact your regional IT Security Team if you have any questions.





5



**PROTECTING  
OUR COMPANY**

# Protecting our company

5.1

## 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 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 accounting standards.

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

Protecting Company assets also involves a responsibility to only incur Company costs and expenses in line with applicable policies. This means having the required internal approvals and authority before entering into commitments on behalf of the Company. It also means only incurring expenses in accordance with the applicable Travel and Expense Policy and reporting these accurately and promptly together with the underlying documentation.



For more information, please refer to our Group Information Security Policy, Group Acceptable Use of IT Resources Policy, Group Delegation of Authority Policy, Group Procurement Policy and with the applicable Travel and Expense.



Always contact a representative from Legal in case of doubt.





5.2

## 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 stakeholders (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.

Business entertainment should only be reasonable, moderate, and appropriate, and given or accepted as part of legitimate business 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 influencing your objectivity or the objectivity of third parties in a business outcome will be subject to disciplinary action and potentially also criminal charges.



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



Always contact your manager or a representative from Legal with any questions or concerns.



**5.3**

## 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 explicitly authorised by local HR and management (including through company policy in compliance with local legislation), you cannot accept or fulfil a position as a board member, officer, employee, partner or consultant for organisations other than Verisure. Authorisation will be withheld if the position or activity is likely to conflict with your responsibilities or the interest of the Company.

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 if 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 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 or HR representative, so that the situation can be documented, and appropriate preventative actions can be taken.



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

### Do this

- ✓ Inform your manager or HR if you have commercial relationships with relatives, spouses, friends, or others close to you that could lead to a conflict of interest
- ✓ Inform your manager or HR representative if you have a family or intimate relationship with a colleague that may create a conflict of interest due to your roles. This will allow them to take appropriate steps to resolve the potential conflict of interest
- ✓ If a reported potential conflict of interest situation continues, renew your reporting at least every two years, unless it is already well-known within the Company.

### 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 first checking the local company policy and getting prior approval from HR and management if necessary
- ✗ Provide advice or services to a supplier of Verisure
- ✗ Influence hiring so that a relative is employed
- ✗ Invest in a supplier, commercial partner, or competitor without disclosure and approval
- ✗ Have a supervisory relationship with a family member or someone with whom you have an intimate relationship.





## Fairness in business

We recognise 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 always act 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 high-quality products and services at fair prices.

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

- Commercial policy and prices must be set independently and should never be agreed upon, 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
- 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
  - Collecting competitive intelligence, including during HR processes, that do not adhere to the principles for doing so established by the Company.



For more information, please refer to our Group Fair Competition Policy and related guidance.



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.

5.4

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

### Confidential Information

You may sometimes have access to confidential information owned by Verisure and sometimes also 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 is not available to the public or competitors. Therefore, it is your 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 confidential information and you must not request confidential information from them.

You must never discuss confidential information in places where you can be overheard, such as airports, restaurants, open spaces, etc. You also must make sure that no confidential information is left visible on desks, screens, external data storage devices, etc.



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



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

### Intellectual Property

Our Intellectual Property, including patents, trademarks, copyrights, trade secrets, registered designs, inventions, and technology, is one of our most valuable assets. You may not allow Verisure Intellectual Property to be used or shared with third parties without the appropriate authorisation and protections in place. You are expected to respect the Intellectual and Industrial Property rights of third parties.



For more information, please refer to our Group Intellectual Property Policy and related guidance.



Always contact a representative from Legal in case of doubt.

### 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 our Group Trade Secret and Confidential Information Policy and related guidance.



For more information, please refer to your contact in Legal or Group Intellectual Property Counsel.



**5.5**

## 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 authorised to do so.

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

### Do this

- ✓ Remember you are a representative of Verisure when you use the Company's uniforms or vehicles so always act with Trust and Responsibility while using them.

### Don't do this

- ✗ Make comments on behalf of Verisure to the media before consulting a Verisure Communications representative
- ✗ Make any statement in any external context that could have a negative impact on the reputation, brands or trademarks of the Company.

**5.6**

## Acceptable use of IT, Artificial Intelligence (AI), 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 unauthorised access.

It is also your responsibility to use AI responsibly and only for the purposes it is intended to be used for. You must always use artificial intelligence tools in accordance with any applicable instructions and guidelines, such as the Group Generative Artificial Intelligence Responsible Use Guidelines.

You are also responsible for:

- Maintaining a reasonable level of security awareness and completing all training as required
- Understanding and complying with Information Security Policies, communications, and guidance
- Ensuring your use of IT complies with the Group Acceptable Use of IT Resources Policy
- Never attempting 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.



For more information, please refer to the Group Information Security Policy, the Group Acceptable Use of IT Resources Policy and the Group Generative AI Responsible Use Guidelines.



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

**5.7**

## Social media

We recognise 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 posts 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 always expect that you:

- Refrain from utilising the company logo and other corporate visual assets unless you have received explicit approval and guidance from your local Communications or Marketing team
- Do not publish strategic, sensitive, private or confidential Company information
- Be truthful and accurate in your description of the Company and 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 images or comments about them or their homes
- Refrain from all derogatory, offensive or inappropriate comments concerning Verisure, our brands, your colleagues, our customers, our business partners and even our competitors
- Refrain from speaking on behalf of the Company unless authorised to do so, and do not respond to messages from competitors or people who comment negatively about the Company. If you see something, forward it to your local Communications or Marketing team
- Refrain from infringing third-party image rights, trademarks, or copyright.

### Do this

- ✓ If you use social media for your job, make sure any posts you make on 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.

### 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.



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



Always contact your local Comms and Marketing team or your manager, someone from the HR or Legal function that can guide you to the right colleague in case of concerns or questions.



6



**PROTECTING OUR  
COMMUNITIES  
AND OUR PLANET**



# Protecting our communities and our planet

We understand that our responsibility to society at large goes beyond our business and includes our communities and our planet.

We are committed to being a positive actor in our communities wherever our expertise, assistance, and solutions are needed. It's intrinsic to our DNA to make a positive impact on our communities through our products and services, the jobs we create and the social actions we undertake. We restate our commitment to human rights and our intent to conduct ourselves as a socially responsible Company wherever we operate. Our people are invited to positively impact their communities by participating in volunteering or charity initiatives across all our geographies. At Verisure we:

- Respect, learn from, and support the communities and cultures in which we work while understanding the impact our business may have on communities
- Engage with communities in a timely, honest, and culturally appropriate manner
- Conduct business activities in a manner that promotes and respects human rights and fosters non-discriminatory behaviour
- Support Company charitable activities whenever we have the opportunity, and it feels right to them
- Obtain approval as required before making any contributions on behalf of the Company.

We are also committed to protecting the planet by minimising our environmental impact. We count on you to act with environmental protection in mind by being as efficient as possible in the use of resources including waste treatment, energy use, fuel use, water use, and biodiversity, and in maximising the durability and recyclability of our products and facilities. Doing our part by using resources responsibly, helping to curb emissions, and following environmental laws and regulations is everyone's responsibility.



For more information on our sustainability strategy, please refer to our ESG website:  
<https://www.verisure.com/esg/2023>





7

# GOVERNANCE



# Governance

Verisure has a strong commitment to acting with Trust and Responsibility – it's part of our DNA - and we count on you to strive towards a workplace where everyone complies with our Code of Conduct.

The Functional and Country Heads are responsible for ensuring that sufficient resources and attention are given to the 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. They are also responsible for continuously building a do-the-right-thing culture within their organisations, ensuring the appropriate processes are in place and followed. This includes addressing and following 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 implementation and areas for improvement. The Compliance Committees will typically consist of the Head of Country, Head of HR, and Head of Legal.

This Code of Conduct sets the standards for everything we do, and the topics covered are complemented by the applicable Group policies, standards, and guidelines.



<i>Initial version</i>	<i>December 2018</i>
<i>Updated version</i>	<i>November 2021</i>
<i>Updated version</i>	<i>September 2024</i>





**verisure**