

**SECTOR  
ALARM**)))

Home of Safety



# Sector Alarm – Code of Conduct

*Approved by the Board on 19 October 2021*

## **1. SECTOR ALARM GROUP CODE OF CONDUCT**

### **1.1 Introduction to the Code of Conduct**

- (1) Sector Alarm Group (including all group companies) (hereafter "Sector Alarm") has developed a Code of Conduct that serves as a practical tool in the daily practice to ensure compliance.
- (2) The fundamental purpose of the Code is to encourage our employees to make sound decisions when it comes to their individual conduct. Therefore, it is also an explicit expression of what Sector Alarm expects from its employees, and others acting on the behalf of, or representing the Group, in terms of behavior and the Group's attitude to our ethical standards.
- (3) Our employees represent Sector Alarm in several different contexts and quite often on travel, thus exposing them to situations of risk. It is important to recognize that both the conscious and unconscious choices of individuals might, in a worst-case scenario, come under the scope of national criminal acts or laws.
- (4) We recognize that there are risks associated with carrying out any business activity. Management is responsible both for ensuring that policies and procedures are in place to manage risks and for complying with national company policies and procedures. As a responsible employer, we further recognize that what might threaten our employees might also be a threat to our company's reputation externally and our internal company culture.
- (5) In order to work within our industry, a clean criminal record is required. While the requirements of such certificates may vary depending on national laws, violations of such national laws may ultimately prevent people from working in this industry.
- (6) Sector Alarm build relationships based on trust. We are therefore determined to abide by the Code of Conduct when acting on behalf of Sector Alarm to maintain and enhance our reputation in the market and amongst our customers.

### **1.2 Scope and responsibility**

- (7) Sector Alarm's Code of Conduct applies to all employees as well as the members of the Board of Directors, representatives for the owners, independent consultants, temporary staff and hired staff.
- (8) Each employee is responsible for reading, understanding and following this Code of Conduct. We expect you to adopt these principles as your own guiding principles in the daily practice, and we expect you to always act safely within the limits set out in this Code. Sector Alarm shall always act in an ethical, responsible and lawful manner.
- (9) You will either be asked to confirm digitally or in writing that you will comply with the Code of Conduct. If you have any questions about the Code or its principles, please do not hesitate to ask your line manager.
- (10) This Code of Conduct is intended to deter wrongdoing and to promote high standards of integrity and compliance with all applicable laws and regulations by everyone that act on behalf of Sector Alarm.
- (11) The Code of Conduct is general in nature and does not provide a complete definition of responsible behaviour. The ultimate responsibility to act in accordance within the law and Sector Alarm's ethical standards will always remain an individual responsibility.
- (12) Management is responsible both for ensuring that policies and procedures are in place to manage risks and for complying with national company policies and procedures
- (13) The Code of Conduct is officially part of the personnel policy documentation in all Sector Alarm subsidiaries.

### **1.3 Whistleblowing and non-compliance**

#### **1.3.1 Whistleblowing**

- (14) Whistleblowing occurs when an employee raises a concern or discloses information, which relates to wrongdoing, illegal practices or unethical conduct that has come to the employee's attention through work.
- (15) Sector Alarm has a whistleblowing policy that is intended to encourage and enable employees to raise concerns within our workplace rather than overlooking a problem or "blowing the whistle" externally.
- (16) Under this policy, an employee is entitled to raise any concerns, dilemmas or disclose information without fear of penalisation or threat of less favorable treatment, discrimination or disadvantage. Every violation report is important and helps Sector Alarm to prevent economic losses and damage to our reputation. With employees help, we can ensure our integrity and reliability and thereby also our success.
- (17) In the whistleblower system, employees can report serious matters such as bribery, extortion, embezzlement, theft, accounting irregularities, bullying, harassment, discrimination or other violations of the Code of Conduct. Your first point of contact should always be your line manager or HR.
- (18) The whistleblower system may not be used to make false accusations against others, and altogether, deliberately untrue information may not be reported.
- (19) There are more information about the whistleblower system and the procedure for whistleblowing in Sector Alarm's handbooks.

#### **1.3.2 Non-compliance**

- (20) Violations of this Code of Conduct may result in disciplinary action, up to and including termination. Disciplinary action will be taken in accordance with national policies and laws. Violations of this Code of Conduct may also subject individuals to possible civil and criminal penalties.
- (21) If you are ever unsure whether a decision is in line with the principles set out in the Code of Conduct, please do not hesitate to ask your line manager or HR to seek further guidance.

## **2. BUSINESS AND SALES CONDUCT**

### **2.1 Antitrust and competition**

#### **2.1.1 Antitrust law**

- (22) One of the most fundamental competition law principles is that all market-players act independently of their competitors. Antitrust laws are designed to ensure a fair and competitive market place by preventing restrictions on free competition, the establishment of monopolies and unlawful competitive practices.
- (23) Sector Alarm wants a fair and open competition in every market, both nationally and internationally. Under no circumstances must Sector Alarm or any of its employees participate in actions that violates current competition laws.

### 2.1.2 Important basic rules

#### **SECTOR **ALARM** employees shall not:**

- Agree to or fix sales prices on alarm services with a competitor. This also includes minimum price, timing of price changes, price targets, rebates;
- Participate in market sharing by agreeing, fix or divide certain customers, territories or markets with a competitor;
- Enter into any other form of agreement or understanding with competitors that are intended to limit competition;
- Discuss or disclose any (current or future) information that might be competitively sensitive, such as prices, customers, sales volumes, market strategies, costs and profit margins;
- Agree with competitors to limit delivery of certain goods or services.

#### **Examples of *anticompetitive* behaviour:**

- Agree with another alarm service provider not to compete for each other's customers;
- Exchange of information regarding the customers/geographical areas in focus;
- Inform another market player about an upcoming win-back campaign;
- Agree with another alarm provider not to expand into a new market segment or geographical area;
- Agree with another alarm provider to divide sales territories amongst themselves;
- Indirect cooperation or sharing of competitively sensitive information through trade organisations, such as the Norwegian Federation of Service Industries and Retail Trade (NHO Service) or the Employers' Organisation for the Swedish Service Sector (ALMEGA).

- (24) The greatest risk for antitrust infringements arises from relations with competitors. Any contact or conversation with a competitor should therefore be avoided, unless prior approved by Group CFO or external counsel. Contact between competitors may later be questioned and subject to unfavourable interpretation by competition authorities. Caution is therefore needed.
- (25) In any event, competitively sensitive matters, such as listed in Section 2.1.2 (above), should *never* be discussed with a competitor. This applies both to informal and professional settings, as for example meetings in NHO Service or ALMEGA.
- (26) If you receive information that could be considered as competitively sensitive, you have to speak up and make it clear that Sector Alarm does not want to receive such information. If the information is shared in a meeting, you must clearly distance yourself from the discussion and leave the meeting.

- (27) Both formal (written contracts) and informal (handshake or "gentlemen's agreements") agreements will qualify as a violation under the prevailing anti-trust rules. Any attempt to reach such anticompetitive agreements, understandings or arrangements may be unlawful, even if unsuccessful.

**SECTOR ALARM employees should therefore:**

- Only participate in meetings where competitors may be present based on a detailed agenda that has been circulated to all parties beforehand, and ensure that discussions are strictly limited to the matters set out in the agenda;
- Take accurate minutes of all topics discussed at the meeting;
- Clearly refuse to engage in any conversations involving confidential information or business secrets;
- Seek advice from your line manager or legal counsel if in doubt as to whether information may be shared with a competitor;
- Leave the meeting immediately if competitively sensitive topics are discussed. Also clearly point out that it is Sector Alarm's policy to comply with antitrust law. Ensure that your objection and departure are recorded in the minutes; and
- Always follow the principle that Sector Alarm's pricing, strategy, customers and geographical areas are not at any time discussed with competitors.

**2.1.3 Consequences of antitrust-violations**

- (28) If competition authorities (either national or at an EU-level) suspects antitrust-violations, they can order inspections without prior notice ("dawn raids") at the premises of Sector Alarm as well as the homes of employees, if appropriate.
- (29) Breach of antitrust rules may lead to substantial fines being imposed on Sector Alarm, with up to 10 % of the Group's annual turnover.
- (30) Employees and executives face a personal risk, in the form of fines or in severe cases, imprisonment.
- (31) If a conversation or a situation appears to restrict competition between Sector Alarm and its competitors, or if you suspect that anyone is violating competition laws, you must notify it to your line manager immediately.

**2.2 Unfair commercial practices and sales conduct**

- (32) Sector Alarm employees shall comply with applicable laws and standards in terms of commercial practices. This means that Sector Alarm shall operate in the market through fair methods.
- (33) When representing Sector Alarm, especially in a sales situation, it must be clear to the prospective customers that we represent Sector Alarm, and if mandated appropriate workwear and identification cards must be worn.
- (34) All marketing and communication regarding Sector Alarm's products and service offerings shall be true, accurate, fair, transparent and in compliance with applicable legislation and internal guidelines. Comparisons with competitors shall be made by using objective and documented information only.

**SECTOR ALARM employees shall not:**

- Fail to identify themselves as employees of Sector Alarm
- Use any marketing practices, including comparative advertising, which creates confusion with any services, trademarks, commercial names or other distinguishing marks of a competitor (i.e. the customer entering into a contract with Sector Alarm under the belief that is contracting with a competing company); or
- Use incorrect, undocumented or subjective comparisons with competing companies. It should be noted that comparisons are not strictly prohibited as long as it based on objective information.

**2.3 Anti-money laundering**

(35) Money laundering is the process when criminal funds or assets are hidden in legitimate business dealings making their source appear legal. It also covers the use of legitimate funds to support crime or terrorism.

(36) Sector Alarm shall not accept, facilitate or support money laundering.

**2.4 Anti-corruption and anti-bribery**

(37) Corruption undermines legitimate business, distorts competition and exposes companies and individuals to risk.

(38) Sector Alarm employees, board members and all other individuals acting on Sector Alarm's behalf are not allowed to engage in any form of corruption or bribery.

(39) Sector Alarm employees, board members and all other individuals acting on Sector Alarm's behalf must neither accept nor offer bribes or other benefits for business or personal gain.

(40) We will comply with applicable anti-corruption laws and regulations everywhere we do business.

**SECTOR ALARM employees shall not:**

- Give or offer an improper advantage in connection with a person's position, office or assignment in either the public or private sector;
- Demand, accept or receive an improper advantage in connection with your position, office or assignment;
- Offer, promise or give a financial or other kind of advantage with the intention to (i) induce a person to perform improperly a relevant function or activity, or (ii) in order to reward a person for the improper performance of such a function or activity;
- Offer to pay, pay or authorise the payment of money or anything of value to a public official in order to influence any act or decision of the public official in his or her official capacity or to secure any other improper advantage in order to obtain or retain business;

- Offer or give an improper advantage to a third party in exchange for this person trying to influence the conduct of someone else (trading in influence);
- Pay a facilitation or grease fee.

(41) By buying services from, or form partnerships with other companies, Sector Alarm expose the company to a liability for breaches of anti-corruption laws by others. We will therefore select our business partners carefully and never engage a business partner that does not adhere to acceptable ethical and business standards.

## **2.5 Gifts, entertainment and hospitality**

(42) Gifts, entertainment and hospitality can be an acceptable form of promoting a company's products and services, in addition to improve the company's image and express appreciation in connection with business events.

(43) However, providing gifts, entertainment or hospitality could be interpreted as an attempt to influence another person, in return for business or services. Any attempt to influence a person by providing gifts, entertainment or hospitality in order to obtain business to our company is strictly prohibited.

(44) Gifts, entertainment and hospitality may be exchanged at a level that does not exceed customary local courtesies and is in accordance with ethical business practices and applicable law. Gifts, entertainment and hospitality should be reasonable in amount, modest and infrequent, and appropriate in the circumstances.

(45) Employees must not directly or indirectly accept, or permit any member of his or her immediate family to accept, any gifts, gratuities or other favours from any customer, independent contractors, supplier or other person doing or seeking to do business with Sector Alarm, other than flowers or low value promotional items (e.g. with a company logo). Other gifts may be accepted in situations where refusing to accept the gift is likely to offend or damage a business relationship, in which case you can accept the gift and hand it over to Sector Alarm as soon as possible.

(46) We must always exercise caution when giving or receiving gifts and entertainment. Always ask yourself about the intention of the exchange and whether it may pose any problems should it be made public to others. If in doubt, ask your line manager for advice. Never accept a gift or take part in entertainment or events that might affect your objectivity or independence.

### **SECTOR ALARM's policy for giving and receiving gifts**

- In giving and receiving gifts, the following criteria must be met:
  - The gift must have a clear business-wise purpose;
  - The gift is reasonable and in line with good business practice; and
  - The exchange must comply with applicable law and regulations
- Employees are unable to give or receive gifts if:
  - Receiver is a person whose positions enables him/her to influence a decision and the gift or hospitality is of the kind that can be seen as an attempt to achieve a beneficial decision;

- Receivers objectivity, reputation, independence, or integrity might be influenced;
- The gift can be seen as a payment for a service;
- The gift can damage the company's reputation if it were to be known;
- The gift is entertainment of unseemly character;
- The gift could be seen as extravagant or inappropriate; or
- The gift is repeated or given regularly and supersedes what one would consider a natural amount of attention through the course of a year. It is, for example, fine to give/receive flowers or confections several times in one year.

## **2.6 International trade, economic sanctions and export control**

- (47) Laws governing international trade affect the transmission of goods, services and technology across national borders. These laws may include economic and trade sanctions, anti-boycott laws, export controls, and laws intended to combat money laundering and the financing of terrorism and other criminal activities. Such sanctions include sanction regulations enforcing UN Security Council resolutions in national laws, sanctions adopted by the European Union and U.S. sanctions.
- (48) It is Sector Alarm's policy to strictly comply with these laws and regulations in the countries in which we operate. Employees who are involved in importing, exporting and in business across national borders have a particular responsibility to remain up-to-date on the latest requirements and regulations governing international trade.

## **3. THE WORKPLACE**

### **3.1 Health and safety**

- (49) Sector Alarm strives to provide a sound workplace for all employees with good working conditions and a good working environment. We will always comply fully with applicable laws and regulations relating to workplace health and safety, and we are committed to safeguarding the health and wellbeing of all our employees.
- (50) All employees have an obligation to comply with health, safety and security policies. Work-related injuries or illnesses must be reported immediately.

### **3.2 Human rights**

- (51) Sector Alarm supports the protection and promotion of human rights. We are committed to respecting human rights of those affected by our activities and to comply with all applicable national and local labour laws in the countries in which we operate. We shall always consider the material social issues and respect basic labour rights when conducting business activities.

#### **SECTOR ALARM shall ensure:**

- Fair employee working conditions, such as minimum wages, working hours and the health and safety of the employees;
- That we recognise the freedom of association;

- That working conditions meet or exceed international labour standards, including the International Labour Organisation's conventions and recommendations;
- That we never discriminate in respect of employment and occupation;
- That we never use any form of forced and compulsory labour in our own operations and commit our contractors or suppliers to the same policy;
- That we never use child labour in our own operations and commit our contractors or suppliers to the same policy; and
- That we seek to prevent or mitigate human rights impact linked to our operations, products or services.

### **3.3 Equal employment opportunities and diversity**

- (52) Diversity in our workplace helps us to attract and retain top talent. This is crucial to the success of Sector Alarm. Thus, we are committed to providing all employees with a working environment free of discrimination, harassment and bullying. This includes any form of unwelcome conduct towards another person, whether verbal, physical or psychological.
- (53) All employees at Sector Alarm shall show respect for all individuals and make efforts to ensure a working environment characterized by equality and diversity. We do not accept any form of discrimination of our own employees or others that are involved in our activities or that we do business with.
- (54) The requirements apply in relation to all unequal treatment, exclusion or preference of an individual or group, for example based on gender, race, disability, age, religion, sexual orientation, political views, national, ethnic or social origin. We follow these principles in all areas of employment, including when we recruit, hire, train, promote and reward our employees.

## **4. PERSONAL CONDUCT**

### **4.1 Conflicts of interest**

- (55) All employees must seek to avoid any activity that is or has the appearance of a conflict of interest with Sector Alarm. We expect you to always act in the best interest of the company, and not make decisions based on what will benefit you personally.
- (56) A conflict of interest exists when your personal interests (such as personal financial interest), interfere, or may appear to interfere, with your independent judgment on behalf of Sector Alarm.

#### **SECTOR ALARM employees should not:**

- Disclose internal information without authorization;
- Use the position in Sector Alarm for inappropriate personal gain or advantage;
- Take part in or attempt to influence a decision if you personally, or someone close to you, can gain advantages from the decision. Persons close to you includes a family member, friend, company in which you hold a significant

interest, or a person to whom you owe an obligation. A business associate or close colleague may also be included in this category;

- Carry on a business in your own time of a similar nature to your work in the company;
- Have paid work, ownership interests or other potential influence or financial interest in one of our competitors, suppliers or customers, or any other business outside the company, if this can be considered to weaken your loyalty to Sector Alarm;
- Accept personal discounts offered by customers or suppliers because of your position at Sector Alarm and which are not available to a large group of employees.

(57) All employees must disclose any conflict or appearance of a conflict of interest with Sector Alarm to the line manager.

#### **4.2 Purchase of sexual services**

(58) Sector Alarm have a zero-tolerance policy towards the purchase of sexual services either for yourself or for others.

(59) While on Sector Alarm business, you may not visit any establishment that would reflect negatively on Sector Alarm. This includes sexually oriented businesses or any such similar environments.

(60) The law in several European countries forbids buying sexual services. In Norway and Sweden it is illegal for their citizen to take part in such activities even when carried out abroad.

#### **4.3 Intoxicants**

(61) To ensure a safe and drug-free workplace, an employee may not be under the influence of any intoxicating substances (e.g. alcohol and illegal drugs) during working hours, while on Sector Alarm premises or while conducting business on Sector Alarms behalf. You must also refrain from using or encouraging others to use these substances in a manner that can place the user, Sector Alarm or any of its business partners in jeopardy or in direct conflict with any national laws around the use, possession or handling of such illegal substances at any time.

(62) At the discretion of Sector Alarm and under strict control, a limited amount of alcohol can be served in work settings when Sector Alarm arrange an event or when local custom or special occasions make it suitable.

(63) Employees on Sector Alarm business, whilst travelling abroad should follow the laws of the hosting country in regard to the purchase and consumption of alcohol.

(64) Employees of Sector Alarm who drive for work as part of their duties are strictly forbidden from driving or being in charge of their company or personal vehicle while under the influence of alcohol, drugs or certain prescription drugs whilst working for or representing the company.

(65) In all Sector Alarm countries the use of intoxicating substances are always subject to local work regulations as well.

(66) Sector Alarm reserves the right to call on the services of local law enforcement agencies in any case it deems necessary.

## **5. COMPANY ASSETS AND CONFIDENTIALITY**

### **5.1 Company assets**

- (67) All property and assets must be treated in a proper manner and only be used for its intended purposes. All physical property, including our facilities, equipment and supply, must be protected from misuse, damage, theft or other improper handling.
- (68) You must take reasonable care when using company property; report any lost or stolen property or equipment without undue delay.

### **5.2 Confidentiality**

- (69) All employees and anyone acting for or on behalf of Sector Alarm must preserve the confidentiality of our proprietary and confidential information and data, including intellectual property, and ensure that it is kept confidential and secure. This duty applies also after the employment with Sector Alarm has ended.
- (70) Confidential or proprietary information may include non-public information and includes, but is not limited to, business plans, marketing and sales programs, product development plans and information about mergers and acquisitions. The obligation to maintain confidentiality extends beyond the termination of the relevant relationship.
- (71) The duty of confidentiality should prevent unauthorized persons from gaining access to information that may harm Sector Alarm's business or reputation. This duty should also protect individuals' privacy and integrity. Employees and managers shall also not engage in unethical or illegal means to obtain confidential information or proprietary data belonging to others.
- (72) All employees with access to the personal data of any other employees are subject to strict confidentiality.
- (73) When recruiting employees from competing companies, we shall not request or encourage such candidates or employees to share confidential information about their former employer(s).

#### **SECTOR ALARM employees must:**

- Be aware of the surroundings to ensure that confidential conversations take place in an appropriate environment;
- Understand that forwarding e-mails can be a breach of confidentiality;
- Ensure that all documents, papers, correspondence and equipment are kept secure at all times and are carefully locked away at night and that all the security procedures are properly maintained at all times;
- Refrain from making contact with or communicate with any members of the press or media or anyone so connected, on behalf of the employer, unless you have obtained the prior written permission; and
- Ensure that we do not receive, offer, request or in any other way misuse any trade secrets or confidential information from or about competitors of Sector Alarm.

## **6. ACCURATE BOOKS AND RECORD KEEPING**

We are committed to ensure that our books, records and accounts are prepared honestly and in accordance with applicable legal requirements. All financial

information must be correct, registered and reproduced in accordance with generally accepted accounting principles. It is never acceptable to create false or misleading records or otherwise conceal the truth from management, auditors, or regulators. Such conduct may constitute fraud and can result in civil and criminal liability for you and the company.

## **7. COMMUNICATION AND SOCIAL MEDIA**

- (74) General enquiries about Sector Alarm or its employees as well as all enquiries from the media, external attorneys and investors should be passed on to Group CFO and/or the Director of Communication.
- (75) Individual employees at Sector Alarm are not allowed to make statements on behalf of Sector Alarm or about the company or the business to media, investors, in social media or in other public fora, without prior written approval.
- (76) Employees taking part in social networks on web sites or in groups that link or refer to Sector Alarm are expected to act and behave in accordance with the core values, standards and policies of Sector Alarm. Thus, all employees must ensure that Sector Alarm is not exposed to legal or reputational risk and that the safety of our employees, customers and the general public is not undermined.

## **8. ENVIRONMENT**

- (77) Sector Alarm will at all times seek to protect the environment and conserving natural resources, and make sure to operate in compliance with applicable environmental laws and regulations. Management and employees are expected to be environmentally conscious in its daily operations and support our initiatives to operate in an environmentally sound manner.
- (78) Sector Alarm are committed to ensuring that the environmental impacts of our operations are reduced wherever possible. We shall support a precautionary approach to environmental challenges and seek environmentally friendly solutions throughout our operations, and we will work to reduce our impact on the environment.

### **SECTOR ALARM shall strive to:**

- Reduce the overall effect of our business activities on the environment by:
  - reducing waste from operations, and ensure the efficient use of resources including energy, raw materials, land and water;
  - managing materials and wastes properly;
  - limit pollution including greenhouse gas emissions;
  - ensure environmentally friendly supply chain choices where commercially practicable;
  - encourage innovation and promote and develop environmentally friendly technologies and practice