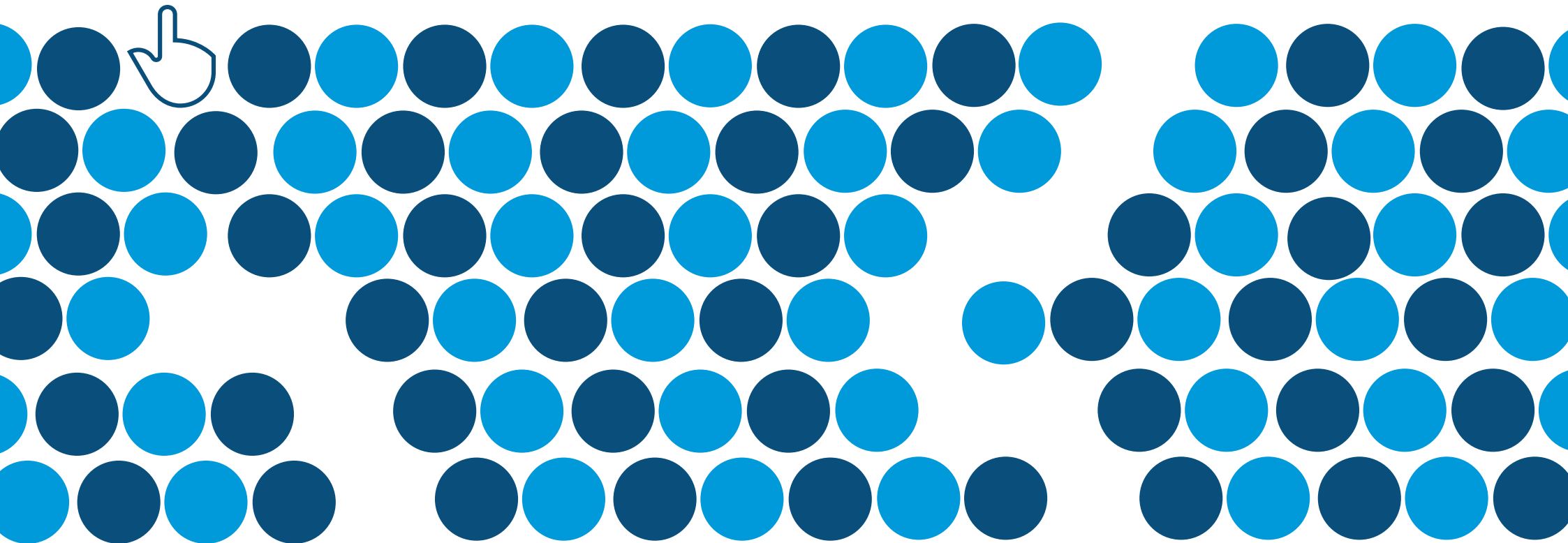




Gunnebo Code of Conduct



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CEO's introduction

A beacon for sustainability

Gunnebo entered the second decade of this century with new owners and a fresh approach to how we do business, based on independent Business Units focusing their expertise on meeting customer needs.

At the same time, we have made a step change towards the digitalisation of our business processes, while using data to revolutionise our product offering and place Gunnebo at the forefront of innovation in the security industry.

A common thread running throughout these changes is sustainability, in terms of our environmental and social impact, the way we value and develop our employees, and the ethical framework governing how we work. A successful business is a sustainable business. We all have a responsibility to the future.

This new Code of Conduct reflects the transformation in our business. Every interaction we have with a customer, a supplier, a business partner, our colleagues, the media or society says something about the sort of company we are. The Code provides clear guidelines on how we should act. Each one of us has a duty to uphold Gunnebo's reputation as a responsible company.

Acting in line with this Code is therefore crucial to our future success. I expect you to read it, reflect on it and dig deeper into the detailed policies on which it is based.

I want Gunnebo to be an open, transparent organisation in which each one of us is accountable, and where each employee feels comfortable to question what we do. That means me, too – I have enormous respect for the work you do, and encourage you to come forward ideas and suggestions. Where there are problems, we have made it easier for employees and stakeholders to report their concerns (see page 22).

In this way, the Code of Conduct is a tool to help us achieve our goal of being the leading global provider of a safer future. Please make good use of it.

Stefan Syrén
President and CEO



Each one of us has a duty to uphold Gunnebo's reputation as a responsible company



Why do we have a Code of Conduct?

Gunnebo's Code of Conduct was first introduced in 2002, since then it has been guiding us to act with integrity and good judgement:

- ✓ To ensure respect for employees and their rights, to offer safe and fair working conditions, to continuously develop skills and competencies to ensure individual job satisfaction and development opportunities.
- ✓ To gain and maintain customers through continuous development, to build lasting relationships based on trust, and to provide products, services and solutions that meet customers' expectations.
- ✓ To ensure productive, ethical and transparent relationships with suppliers, customers and other partners by establishing clear guidelines and expectations and conducting necessary control.
- ✓ To deliver value through sustainable profitable growth by always considering health, safety and our impact on the environment.
- ✓ To manage the business as a responsible, ethical member of society, acting according to the laws in the countries where we are present, showing respect for the protection of internationally proclaimed human rights.



Who does it apply to?

Employees

All Gunnebo employees, everywhere we operate, must follow the Code of Conduct and all Group policies.

Entities controlled by Gunnebo

Every entity Gunnebo controls is required to adopt and follow the Code of Conduct and all related compliance policies.

Third parties

Third parties representing Gunnebo, such as consultants, agents, sales representatives, distributors and independent contractors, must follow our Channel Partner's Code of Conduct.

Suppliers

We expect our Suppliers to follow the requirements stated in our Supplier Code of Conduct.

Expectations: Employees

All employees shall contribute to Gunnebo's culture of compliance by understanding the Code of Conduct and Gunnebo's policies, embracing and actively engaging in Gunnebo's commitment to ethics and integrity, and acting to enforce compliance and avoid violations.

▼ All employees therefore have the following responsibilities:

- Follow the law: it is Gunnebo's policy to comply with the law everywhere we do business. No one has the authority to violate any law or to direct another person to violate the law on behalf of the company.
- Understand Gunnebo policies: gain an understanding of the policy requirements set forth in the Code of Conduct.
- Learn the policies applicable to your job.
- Check the company's intranet (Midas) for complete and up-to-date policies.
- Go to your manager with any questions about policies. If you still have questions, contact a member of Group Legal or Group HR.
- Raise your concerns promptly about potential violations of the Code of Conduct, or any Gunnebo policy, by contacting your manager or a high-ranking manager, or using the Gunnebo Ethics Helpline (see reporting process on page 22).

Expectations: Managers

As a manager, you should create a culture of compliance in which employees understand their responsibilities and feel comfortable raising concerns without fear of retaliation. This means encouraging ethical conduct and compliance with the law by personally demonstrating and pro-

moting the Gunnebo Performance Cornerstones, considering compliance efforts when evaluating and rewarding employees, and ensuring that employees understand that business results are never more important than ethical conduct and compliance with Group policies.

▼ A manager must take the following steps to build an infrastructure to prevent, detect and respond to compliance issues:

Prevent compliance issues:

- Ensure that policies and processes, tailored to address your particular risk areas, are communicated and implemented.
- Ensure that all employees receive education about Gunnebo policies and relevant laws.
- Commit adequate resources to implement compliance efforts.

- Implement control measures, such as appropriate financial and non-financial controls.

Detect compliance issues:

- Promote the Gunnebo Performance Cornerstones and the Code of Conduct.
- Encourage employees to speak

up and report integrity or compliance issues.

Respond to compliance Issues:

- Promptly implement corrective action to fix compliance weaknesses when identified.
- Follow up on Code of Conduct trainings for your employees.

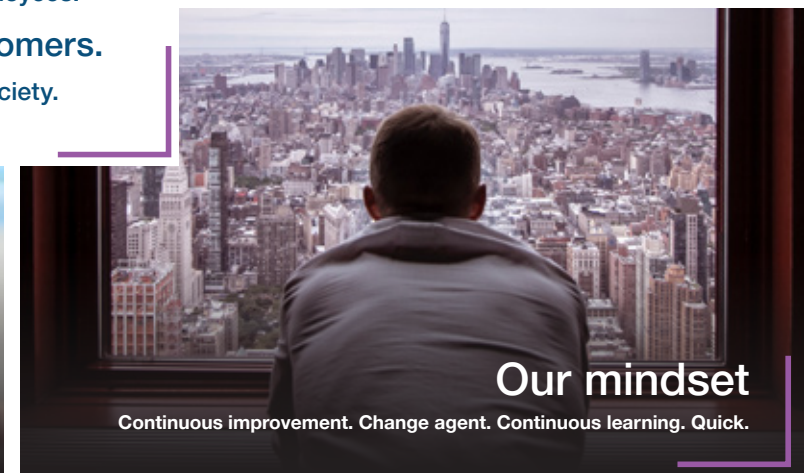
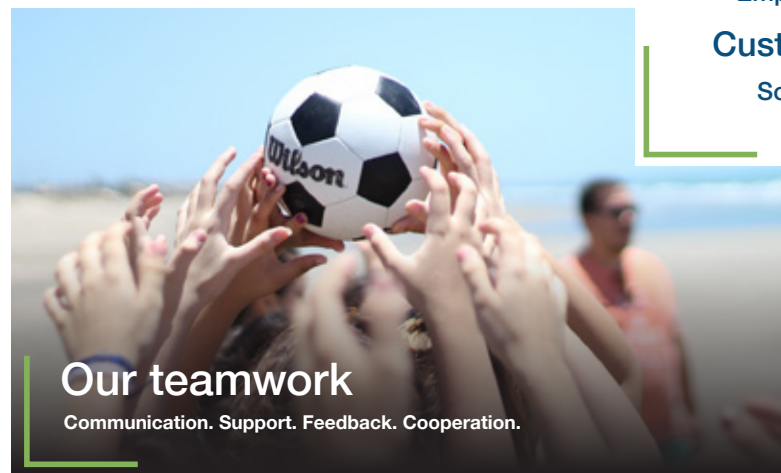
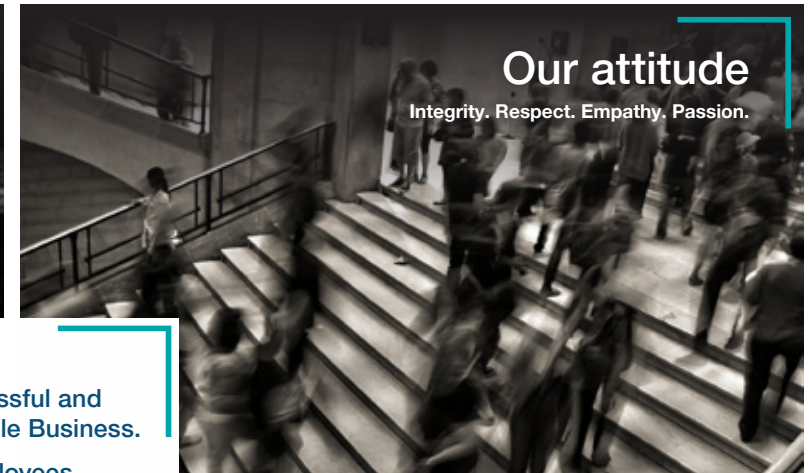
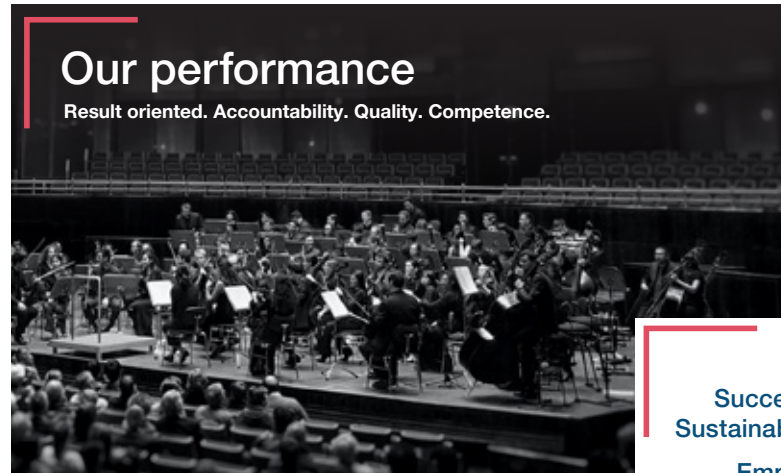
Gunnebo Performance Cornerstones

Our Code is what Gunnebo stands for and what we expect from our employees. In addition to this, we have our Performance Cornerstones – the direction for how we want our employees to develop.

The Gunnebo Performance Cornerstones are our preferred way of acting and represent the core values and competences required to be successful within our company. The four cornerstones are:

- Our performance
- Our attitude
- Our teamwork
- Our mindset

Our performance cornerstones are an integrated part of our daily work. They are also used for follow-up and coaching in our performance evaluation process.



Successful and Sustainable Business.

Employees.

Customers.

Society.

Gunnebo and sustainability

At Gunnebo we strive to be a sustainable business. We base our sustainability work on our Sustainability Approach and Sustainability Policy. Our three pillars of sustainability are

- [Our Business](#)
- [Our People](#)
- [Our Impact](#)

In this Code of Conduct we use the same structure to help explain how we want you to act when working for Gunnebo.



Our Business



The Group's mission is to create a safer world – for all our stakeholders. We aim to build and maintain a sustainable and thereby ethical business, both internally and in collaboration with our business partners.



Taking a decision. Is your action in line with the Code?



Bribery and corruption

Any payment, gift or favour that is made to gain an improper advantage in any business situation is never acceptable and exposes you and Gunnebo to possible criminal prosecution. Gunnebo expressly prohibits improper payments, gifts and favours in all business dealings in every country around the world, whether with governments, other businesses or private individuals.

- Gunnebo will never accept suppliers, vendors or partners that offer bribes, and we will take action if such bribery is discovered. All forms of compensation to agents, suppliers and partners shall relate only to justified (bona fide) products or services.
- Just as giving or accepting a bribe is illegal, so is asking for or offering a bribe, even if the transaction never occurs. If you feel that you are being pressured by anyone to provide a personal incentive, you must say "NO", and refer the client to our Code of Conduct.
- Gifts, entertainments, compensations and personal favours may be offered to, or received from, a third party only: in connection with a legitimate business reason; if they are modest in value; and consistent with customary business practice. No gifts, entertainments, compensations or personal favours may be offered in violation of any applicable law.



Conflicts of interest

On the job or in your free time, nothing you do should conflict with your responsibilities to Gunnebo. No activity at work or at home should hurt Gunnebo's reputation or business. Misusing Gunnebo's resources or influence is also prohibited.

Even when nothing wrong is intended, the appearance of a conflict of interest can have negative effects. It is crucial to consider how your actions might appear, and to avoid the perception of a conflict of interest. The foregoing includes:

- Financial interests in another company where you could personally affect Gunnebo's business through that company (for example, as a customer, supplier, or investment).
- Performing part-time jobs in Gunnebo hours or using Gunnebo equipment or materials.
- Gifts of other than nominal value – as well as personal discounts or other benefits – from suppliers, customers, or competitors, particularly if you are making decisions on Gunnebo's behalf that involve them.
- Directing business to suppliers when you know they are owned or managed by your family members or friends.
- Misusing Gunnebo resources, your position or influence to promote or assist in an outside activity.
- Hiring, promoting, or directly supervising a family member or close friend.



Confidentiality

Protecting information that Gunnebo considers confidential is crucial. Theft or unauthorised use or disclosure of confidential information could significantly hurt the company. This includes any non-public information about our processes, products, innovations, and financial or strategic plans or positions.

- Make sure you are authorised and have a proper business purpose before disclosing confidential information to anyone.
- If you need to disclose, do so only on a “need to know” basis.
- Make sure that there is proper confidentiality in place
- Do not discuss confidential information in public places or leave confidential material unattended, even in the office.
- Protect the confidential information that suppliers, business partners and others share with us.
- An obligation to protect confidential information may continue after you have left the company.



Antitrust and competition laws

Antitrust or competition laws aim to prevent or prohibit agreements or understandings between competitors, distributors or partners that undermine competition by regulating the behaviour of dominant companies within an industry. Additionally, antitrust laws require prior review and possible clearance for mergers, acquisitions, and certain other transactions, in order to prevent transactions that would substantially reduce competition.

- Gunnebo should always compete on the merit of our products and services and never take actions that are illegal under competition laws, such as engaging in agreements or understandings with competitors or price-lifting with distributors – express or implied, formal or informal, written or oral – that undermine competition.
- These laws are complex, global in reach, and can operate differently in each situation. It is essential that you consult Group Legal as appropriate.



Sanctions and export controls

Sanctions and export control laws impose restrictions on exports and trade between countries, in order to put pressure on, or prevent funding of, certain regimes, individuals or organisations. Gunnebo has a global presence with sales and exports to many parts of the world. It is therefore of crucial importance that all business conducted by Gunnebo complies with all applicable sanctions and export control laws.

- Always follow procedures involving due diligence, i.e. screening your business partners.
- Investigate export license requirements before exporting a product or sharing technical information or software across a national border.
- Gunnebo’s distributors and agents must also abide by these laws when selling and distributing our products.
- Penalties for violating sanctions and export control regulations can be severe; both the company and its employees can be subject to very large fines, and individuals may also face the risk of imprisonment. Violations could also cause reputational damage and could lead to the breach of financial agreements.

Screening your business partners. Always follow procedures involving due diligence.



Intellectual property

Patents, trademarks, copyrights, trade secrets, and other proprietary information – often called intellectual property – are valuable assets for Gunnebo. All employees must work to safeguard our intellectual property. At the same time, it is critical that Gunnebo respects the valid intellectual property rights of others.

- If you have access to any confidential information or intellectual property, handle it properly, safeguard it from inappropriate disclosure, and use it only in ways that are permitted. If the information belongs to a third party, follow any agreements with that party, including on use or disclosure.
- A key to protecting our intellectual property, and at the same time guarding against risk, is the timely and reasonable review of new Gunnebo products, services, processes and technologies for possible infringement of the intellectual property rights of others.
- Unauthorised use of others' intellectual property can expose Gunnebo and its employees to civil lawsuits and damages, significant fines, and even criminal penalties.



Data privacy

Gunnebo has a responsibility to look after the information that we collect about individuals, including our employees, customers and business partners. When people trust us with their information, we should live up to that trust. Data protection laws give individuals the right to understand, and in some cases control, how their data is used. They also place obligations on Gunnebo to handle people's data fairly and to respect their rights. This means:

- Give people information about how Gunnebo processes their personal data.
- Make sure you always have a good, lawful reason or specific business need to process personal data.
- Process only as much personal data as you need, and no more; keep personal data accurate, complete, and up to date; keep personal data only for as long as you need it, and thereafter ensure to delete or anonymise it.
- Share personal data with third parties only if you have valid legal grounds to do so.
- Protect personal data from getting lost or stolen. Make sure service providers also protect our personal data.
- Allow individuals the right to access, correct or erase their personal data, or object to it being used for certain purposes.



Product compliance

Gunnebo products are designed, manufactured, marketed, and sold to comply with applicable legal requirements and standards. We believe that compliance is essential to build trust in our products, leading to success for us and for our customers. The foregoing includes:

- Comply with all legal and regulatory requirements as well as international standards.
- In product development or when changing a current product, make sure that regulatory and legal standards are met.
- Do not change test results for them to look better and do not take shortcuts or make decisions that compromise product compliance.
- Do not provide misleading information.

Do not take shortcuts or make decisions that compromise product compliance





Anti-money laundering

Money laundering is the act of placing illegal gains into the financial system in ways designed to avoid drawing the attention of banks, financial institutions or law enforcement agencies. People involved in criminal activity such as terrorism, drug trafficking, bribery, or fraud may try to launder the proceeds of their crimes to hide them or make them appear legitimate.

- Do not accept large cash payments for products or services, accept payments from entities other than the contractual customer, or allow a customer to settle their account through multiple payments directly into our accounts.
- Ensure you conduct business only with reputable customers involved in legitimate business activities with funds derived from legitimate sources.
- Each Gunnebo entity should implement risk-based know-your-customer due diligence procedures calibrated to the risk in question and should take reasonable steps to prevent and detect unacceptable and suspicious forms of payment.



Political involvement

Gunnebo observes strict neutrality with regard to political parties, candidates and related institutions. Neither the name nor resources of Gunnebo shall be used to promote the interests of political parties or candidates. This means:

- Do not make political or charitable contributions using company funds or in the company's name.
- Do not use working hours, company property, or any other company resources to promote your personal political interests.
- Do not fundraise for political causes or promote political candidates while at work.



Accounting and reporting

We should ensure to report in a transparent, truthful, and timely manner to convey a true picture of our performance, both at a local entity level and a group level. We report financial transactions in accordance with generally accepted accounting practices. This means:

- Be honest, accurate and complete when reporting or recording information about our business.
- Ensure that records are always securely maintained to avoid any unauthorised use or alteration, disclosure, damage or loss.
- When submitting or approving expenses, ensure they accurately reflect the transaction and comply with company policies and procedures.
- Never misstate facts when recording a transaction or enter information that you know is incorrect.
- "Off the books" accounts, transactions, and assets are prohibited.

Do not allow a customer to settle their account through multiple payments directly into our accounts.





IT and information security

Gunnebo is subject to constant and increasing IT threats, and we must ensure high security for our internal and external stakeholders. IT and information security constitute cornerstones to uphold customer services and business operations following applicable laws and regulations.

- Gunnebo's IT Policy gives guidelines for the safe use of email, internet, online meetings, mobile devices, and computers.
- Each individual user is responsible for exercising good judgement regarding the appropriate use of IT resources.
- IT resources should be seen as work tools and must not be used against the company's interests.
- Your access and authorisations are personal and must never be transferred or made available to others, whether internal or external.
- Users are asked always to be cautious and vigilant with respect to information security, seeking advice whenever you feel uncertain how to act.



Communications

Information from Gunnebo Group, including all the company's communication activities, shall conform to ethical standards. Gunnebo shall be open and approachable in all its communications, providing factual and consistent information about the company's offering and operations.

- All communication shall strive towards building and strengthening the Gunnebo brand, internally and externally.
- Gunnebo shall protect the Group's corporate name, brands and trademarks from usage that can be confusing, misleading, conflicting, or that dilutes its meaning.
- Gunnebo shall not participate in national or international politics or take actions that could be regarded as political or religious.
- Confidentiality is part of the nature of the Group's business. All customer-related communication and reference cases, including information about businesses and installations, must therefore be cleared with the customer before any external or internal communication is made. We should never discuss specific customer solutions with third parties.



Seek advice whenever you feel uncertain how to act.

Our People



Employees are the company's greatest asset and key to long-term growth and success. We want to be an employer that people are proud to work for. We want to offer good working and living conditions for both our employees and the people around us.



At Gunnebo we have a zero-tolerance attitude to any form of discrimination.



Equal opportunities and non-discrimination

Everyone is entitled to human rights, including the right to be treated equally and the right to be protected from discrimination. In the workplace this refers to equal job opportunities and fair treatment of employees and job applicants. We at Gunnebo have the utmost respect for these fundamental values: equality and non-discrimination.

- We stand for equal opportunities. Recruitment, promotion, remuneration, redundancy, retirement, or any other employment-related decisions must be made solely on the basis of the qualifications for the job, regardless of race, religion, age, national origin, gender, sexual orientation, political opinion, union membership, marital status, disability or any other characteristic protected by law.
- We strive to create such a working environment where every employee feels valued, where their knowledge, experience and skills are critical factors for their success, where everyone acts professionally and without bias.
- We do not tolerate any form of harassment, retaliation or violence in the workplace. This includes verbal or physical harassment, bullying, sexual harassment, power harassment, racism, inappropriate humour or other actions that offend or cause distress.



Respect

Being valued and treated respectfully helps to promote a positive work culture in which employees are fulfilled, loyal, engaged, and motivated to perform at their very best. In Gunnebo we should treat colleagues and all other stakeholders with mutual respect. Respect should be understood as accepting somebody for who they are, even though they are different from you or do not agree with you.

- No one should bully, intimidate or threaten any other.
- Behaviour that could be found offensive or inappropriate should be avoided.
- We apply a zero-tolerance attitude to any form of discrimination.



Diversity and inclusion

Gunnebo believes a diverse workforce contributes to a more profitable business – a position backed by research. A diverse and inclusive workplace supports higher revenue growth, higher employee retention, and greater readiness to innovate.

- Diverse teams are encouraged in the organisation to bring different perspectives to our work, whether it is in a management team, a project group, or in any other part of the business.
- We should strive towards creating an inclusive environment in the company and with regard to our stakeholders.
- We should encourage diversity and try our best to challenge our unconscious behaviour, for example by respecting that we are all individuals and have different points of view.



Modern slavery and human rights

Modern slavery is the severe exploitation of other humans for personal or commercial gain. It could look like a normal job, but the difference is that humans are being controlled by violence, threats, or bring forced into debt from which they cannot escape. Worldwide, people trapped in modern slavery tend to be children and women/girls.

- Gunnebo does not tolerate any form of modern slavery, including forced, bonded, or compulsory labour, or human trafficking. Gunnebo employees are responsible to ensure that modern slavery is not present at any stage in the production of our products
- Gunnebo employees should respect human rights. As an organisation, we are committed to an ongoing risk management process to identify, prevent, mitigate and account for how we address any potentially adverse human rights impacts of our business.



Compensation and working hours

Gunnebo complies with all relevant labour laws, standards and regulations, including those relating to remuneration practices, working hours restrictions and provision of leisure time.

- Remuneration for work should, as a minimal requirement, comply with all relevant laws and standards, including those relating to minimum wages, overtime, statutory benefits and paid vacations.

- Each employee shall be rewarded in a correct and fair manner in accordance with their individual performance and contribution to the success of the company.
- We respect our employees' working and leisure hours. No employee should work beyond the maximum permitted hours.
- We strive to maintain and encourage a healthy work-life balance for our employees.



Maintain and encourage a healthy work-life balance for our employees.



Employee consultation, freedom of association and collective bargaining

Gunnebo strives to maintain good communication with each employee through varied channels and procedures, as well as recognising the right for employees to organise and their right to collective bargaining and agreements.

- We promote clear and transparent information and consultation procedures for employees and management to facilitate constructive dialogue and effective communication.
- We acknowledge and respect the right of our employees to form or join any legally recognised unions or associations, as well as to choose their representatives, to bargain collectively and to strike.
- Worker representatives should not be in any way discriminated against and should have full access to perform their representative functions.



Use a risk-based approach, speak up and stop any unsafe working practices



Health and safety

Gunnebo is committed to providing safe and healthy working conditions by controlling the risks associated with its processes and thereby ensuring compliance with relevant health and safety laws and regulations.

At Gunnebo, we have a strong belief that employees who feel good, both physically and mentally, perform well, and therefore, in addition, we promote well-being activities. We shall contribute to a healthy and safe workplace by, for example:

- Applying a risk approach in all situations, always putting safety first and proactively working to control core hazards.
- Following instructions, especially when using production machinery, and never taking shortcuts. We shall provide the right tools and equipment to carry out tasks safely and effectively.
- Using personal protection and proper work equipment, such as ear protection when noise is above acceptable levels and especially considering protection for hands while working in production.
- Openly and honestly reporting incidents, fully investigating them and learning from them, communicating and sharing knowledge on safety to promote a safety culture. Employees should be empowered to speak up and stop any unsafe working practices.

Our Impact



We care about the environment and take responsibility continuously by striving to improve our environmental performance. We focus especially on reducing our contribution to climate change, including, but not limited to, handling resources as efficiently as possible, striving to have a circular mindset and applying circular economy principles. We consider environmental risks and strive to mitigate them.



Environmental care

Being a global company with several production plants and sales companies all over the world, we impact the environment both directly and indirectly, in our own operations but also throughout our supply chain. In our day-to-day activities we shall consider our environmental impact by:

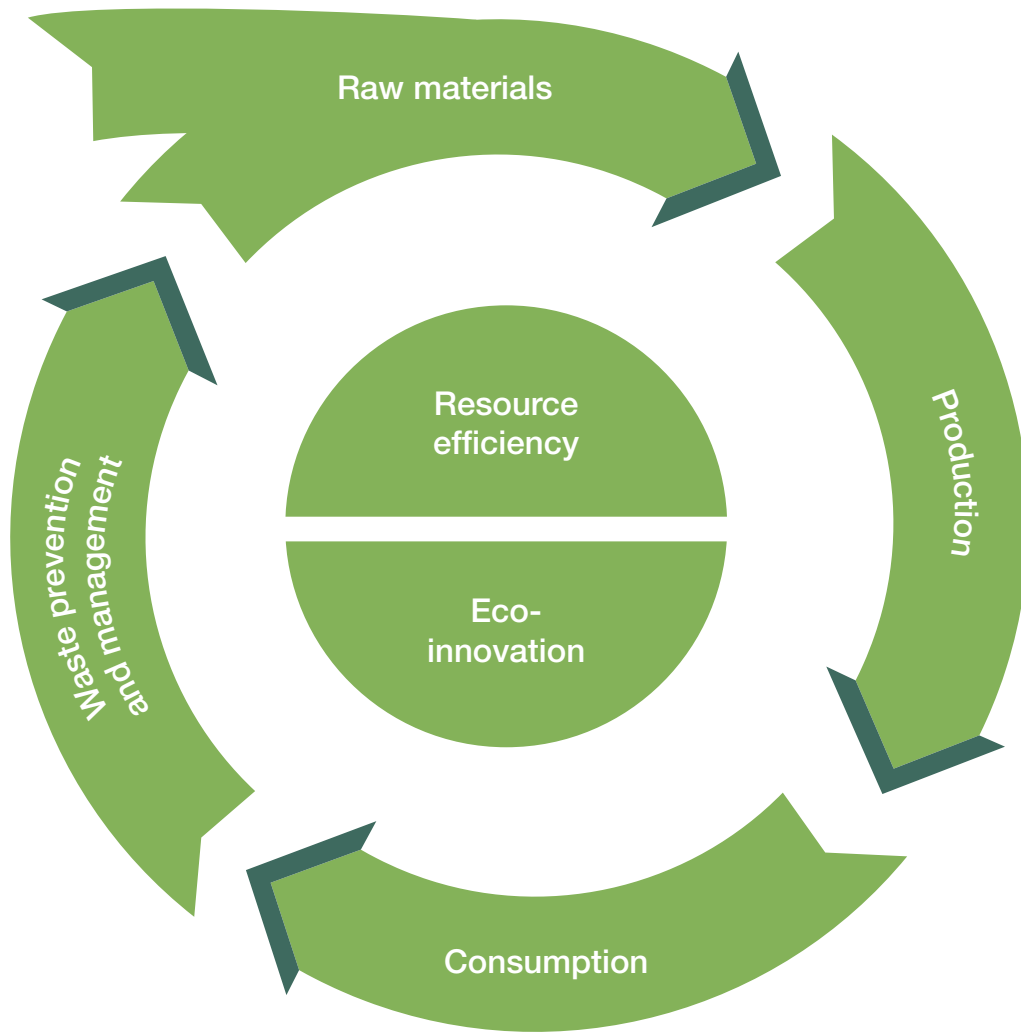
- Always following environmental local, regional laws and company rules e.g. related to materials, chemicals, and waste.
- Regularly and proactively improving our environmental activities using best practices.
- Always considering the environmental impact when acting and taking decisions, using the precautionary principle and avoiding unnecessary risks.



Climate and energy

As an organisation we aim to limit our impact on climate change by reducing our greenhouse gas (GHG) emissions and striving to achieve climate neutrality. We shall assess and mitigate our own and Gunnebo's environmental footprint by:

- Reducing our energy usage.
- Increasing our share of renewable energy sources.
- Using resources such as materials, chemicals, water etc. as efficiently as possible.
- Limiting our waste by reducing it, re-use and recycle.
- We shall also, together with our business partners and suppliers, limit GHG emissions in the supply chain.



Resource efficiency

In Gunnebo, we strive to have a circular mindset, considering the materials that we purchase and limiting the waste that we contribute to. We use materials, chemicals, water and other resources as efficiently as possible and actively work to limit the environmental impact of our products and services. We shall:

- Limit purchase and usage of virgin materials by purchasing and using recycled materials if applicable.
- Recycle and re-use instead of disposing, if possible, to limit our waste to landfill.
- Increase the share of non-virgin raw material (e.g. re-used or recycled material).
- Try to use materials that for others might be considered as waste (waste hierarchy).
- Strive for ecodesign when developing new or current products or services, to reduce our future environmental impact.

Managing resources

It is important that we manage resources in a proper way to avoid unnecessary environmental and health risks. We shall:

- Be cautious when handling, storing, and transporting chemicals, materials, and waste.
- Be especially cautious with hazardous materials, chemicals, or waste and/or dangerous goods to reduce health and environmental risks such as contamination or other hazards.
- Don't use metals and minerals in production and installation that have been extracted and traded while contributing to human rights abuses, unethical business conduct, environmental damage and/or funding for conflicts.

Applying the Code of Conduct *in practice*

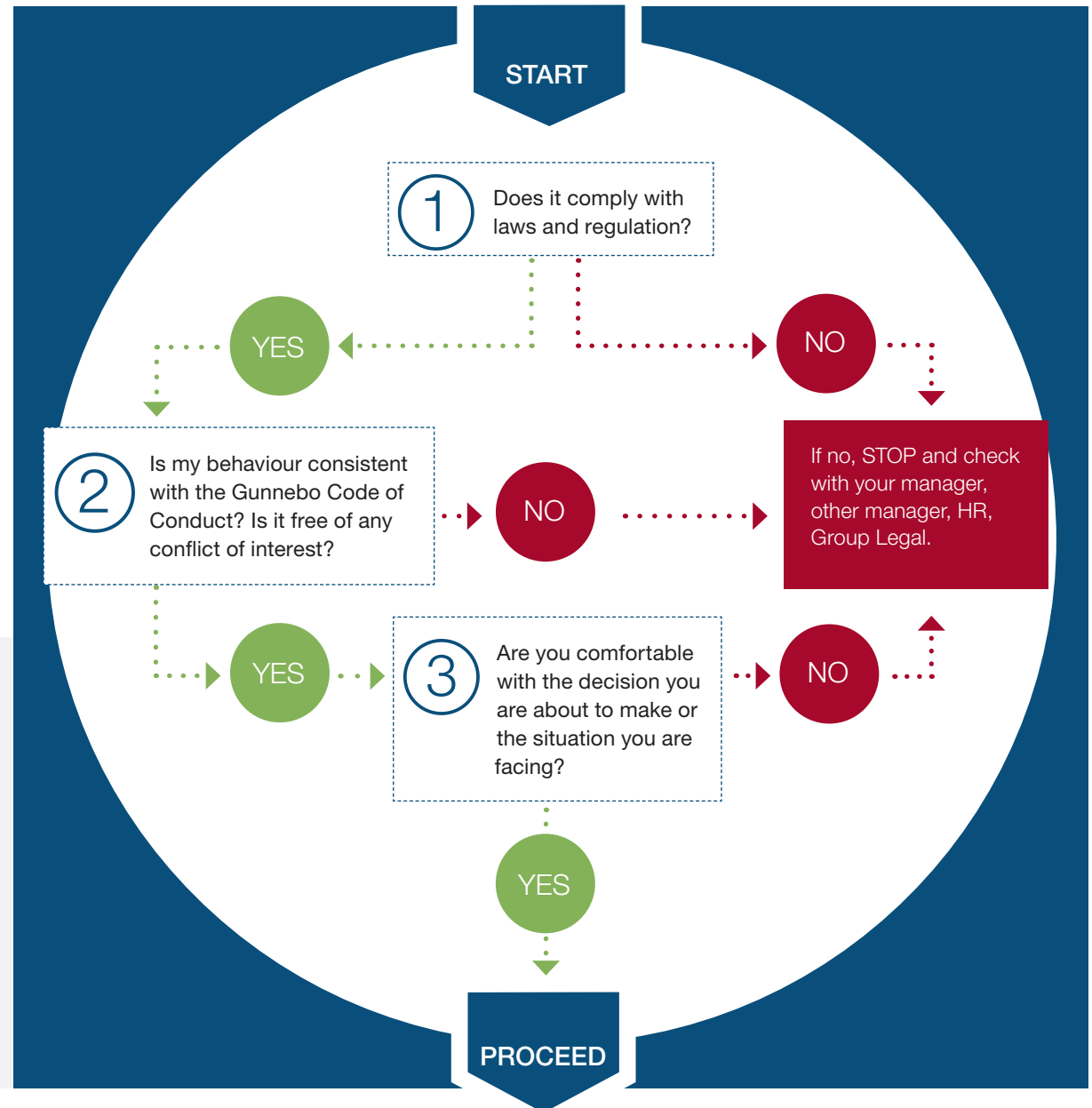
Gunnebo employees must comply with all the applicable laws and regulations of the country in which the company operates. In cases where a conflict exists between more restrictive laws and local customs and this Code's principles and values, the law and local customs shall prevail.

We shall respect the local traditions and customs of each country.

If you are unsure whether an action complies with our Code of Conduct, ask yourself the following questions:



- 1 Comply**
Does it comply with laws and regulations?
- 2 Consistent**
Is my behaviour consistent with the Gunnebo Code of Conduct? Is it free of any conflict of interest?
- 3 Comfortable**
Are you comfortable with the decision you are about to make or the situation you are facing?



How to report a violation of the Code

Gunnebo strongly encourages you to report violations of this Code of Conduct. Have you seen anyone acting in a way that you believe to be wrong?

Then please report your concern so the matter can be investigated and actions taken if required. All Gunnebo employees and employees controlled by Gunnebo are expected to report any conduct that they believe, in good faith, to be a violation of the law and/or the Gunnebo Code of Conduct.

Gunnebo does not tolerate any form of retaliation.

So how should you report your concerns?



1

Your manager

Your first step should be to report the suspected violation to your manager or local HR.

2

A higher-ranking manager

If you are not comfortable contacting your manager, or if your manager is involved in the suspected violation, or in any other way has a conflict of interest or is unable or unwilling to address your concerns, you should report the situation to a higher-ranking manager, or Group Legal if you prefer. All Gunnebo managers are required to address, investigate and satisfactorily resolve all matters reported in accordance with the above.

3

The Gunnebo Ethics Helpline

If you don't feel comfortable using any of these procedures, you can make an anonymous report using the Gunnebo Ethics Helpline. This channel offers an anonymous and confidential reporting solution provided by an independent third party, not affiliated with Gunnebo in any way. It is available 24 hours a day, seven days a week. You can report in two ways:

- Call 1-800-461-9330 (in the US) or +1-720-514-4400 (outside the US)
- Via the Internet at [Gunnebo Ethics Helpline](#)



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