

May 31, 2022

A man with a beard and glasses, wearing a dark suit jacket over a blue shirt and dark trousers, is walking towards the camera in a modern office hallway. He is looking down at a smartphone in his right hand. The hallway is brightly lit with large windows on the right side, reflecting the man and the interior. The ceiling has a series of modern, cylindrical pendant lights. In the background, there are several orange armchairs and a long table.

CODE OF CONDUCT
BUSINESS PARTNERS

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Introduction

CERTEGOs heritage dates back to the traditional lock business founded 300 years ago. Today we provide the Nordic region with complete security solutions in areas such as locking, access control, detection and monitoring. Our customers are found in almost every industry, from high-risk buildings and offshore oil platforms to hospitals and multi-residential buildings.

CERTEGO is committed to contributing to sustainable development, which includes identifying, preventing, mitigating, and accounting for adverse environmental, social and governance impacts throughout our value chain. We expect the same commitment from our Business Partners.

The CERTEGO Code of Conduct, hereafter referred to as the “Code” is developed to explain what we expect from you as our business partner, supplier or service providers, hereafter referred to as “Business Partner”.

CERTEGO expect all Business Partners to comply with applicable legislative and regulatory requirements as a minimum. In cases where the requirements in the Code are stricter than local or regional laws, the requirements of the Code must be applied. Any contradictions between the Code and applicable laws and regulations must be communicated to CERTEGO.

The Code is based on international regulations covering the OECD Guidelines for Multinational Enterprises, the UN’s Universal Declaration of Human Rights, the UN’s Convention on the Rights of the Child, and the International Labour Organization (ILO) Core Conventions.

How we verify compliance

All key Business Partners are required to sign this Code of Conduct. CERTEGO will audit key partners if infringements can be suspected. Upon request, the Business Partner is expected to engage in such an audit in a transparent and timely manner. This applies for both the Business Partner and any sub suppliers that CERTEGO requests to audit.

Report of non-compliance

Business Partners shall immediately report existing or suspected material breach of regulatory requirements and the Code to a CERTEGO representative or anonymously through our secure web portal Whistle B:

- English: <https://report.whistleb.com/en/certegogroup>
- Swedish: <https://report.whistleb.com/sv/certegosverige>
- Norwegian: <https://report.whistleb.com/no/certegonorge>
- Danish: <https://report.whistleb.com/da/certegodanmark>
- Finnish: <https://report.whistleb.com/fi/certegosuomi>

In the event of a breach of the Code, CERTEGO and the Business Partner will develop a remedy plan.

Termination

If the partner fails to remedy the breach after repeated requests, the business relationship will be terminated.

Business ethics

Introduction

Business Partners are expected to comply with all laws and regulations concerning competition, financial reporting and taxation.

Competition and antitrust laws

Partners shall comply with applicable competition and antitrust laws and regulations. This means, among other things not exposing confidential information such as price lists or order volumes.

Partners must always negotiate agreements in accordance with fair competition principles and not prevent or restrict competition or fair trade.

What we expect

- Implement a competition and antitrust law policy
- Provide relevant training to your staff
- Maintain record of employees trained in the policy

Anti-corruption

Business Partners must comply with international anti-corruption conventions and not engage in, or cause CERTEGO to engage in any form of corrupt practices, including bribery, extortion, kickbacks and improper benefits to improperly influence CERTEGO's employees or third parties, such as subcontractors or public officials.

Excessive entertainment and gifts can be a form of bribery. In order to take away any doubt, these expenses should be limited in value, for a business purpose, well-documented, and reasonable.

What we expect

- Implement an anti-corruption policy
- Provide relevant training to your staff
- Maintain record of employees trained in the policy

Conflict of interest

Conflict of interest between a Business Partner and CERTEGO must be avoided. Conflicts of interest may include outside business activities, personal financial interest, inside information, employment of, buying from, or selling to family members and close personal friends.

What we expect

- Report to a CERTEGO representative or anonymously through our secure web portal Whistle B, suspected personal affiliation between CERTEGO and

suppliers which can create situations of conflict of interest. Examples can be supplying companies run by family members, relatives and friends.

Data privacy and protection

CERTEGO Group is committed to operating in compliance with data laws across all companies within the Group. The EU General Data Protection Regulation (“GDPR”) requires us to meet principles of fairness, accountability and transparency in handling personal data.

Following data protection principles, in compliance with the obligations set out in GDPR, when processing personal data, mean that you:

- Only collect personal data for specific and legitimate purposes
- Do not process more personal data than is necessary for its purpose
- Erase personal data when it is no longer needed
- Protect personal data from breaches to ensure the integrity of the individual
- Keep records of personal data up to date to ensure accuracy
- Be able to demonstrate that you live up to the General Data Protection Regulation

What we expect

- To have a signed Data Protection Agreement with CERTEGO, if applicable
- Implement and follow all applicable principles for personal data protection
- Upon request demonstrate documentation on how you comply with GDPR
- Notify CERTEGO, without due delay, in the event of any personal data breach

Trade compliance

Business Partners are expected to maintain and share accurate trade data and documents related to their products. We expect you to comply with local laws and international sanctions regulations and do not engage in or cause CERTEGO to engage in any form of sanction breaches.

What we expect

- Stay up to date with existing legal requirements relevant to the business
- Ensure that all legally required permits, licenses and registrations are valid
- Implement trade compliance procedures
- Provide relevant training to your staff
- Obtain CERTEGO’s consent prior to outsourcing production or parts of production to a sub-supplier or contractor if this has not been agreed in advance

Human rights & labor standards

All human beings around the world should be treated with dignity, fairness and respect. CERTEGO will only engage with Business Partners who demonstrate a serious commitment to compliance with human rights laws. To ensure compliance, we will perform human rights due diligence if any concern is raised.

Child labor

CERTEGO recognizes the rights of every child to be protected from economic exploitation and from doing work that is likely to be hazardous to their physical, mental or spiritual health, harmful to their moral or social development, or to interfere with their education. We expect the same from our Business Partners.

Employees must not be younger than 15 years of age (or 14 if allowed by national law). If relevant national legislation has set a higher age, this age will apply. Young workers (below 18 years old) must not perform work that is mentally, physically, socially, or morally hazardous or that interferes with their mandatory schooling. Young workers must not work night shifts.

What we expect

- Work proactively to prevent child labor, not only in your own operations, but also in your supply chain
- Have a system implemented to certify that no minor workers are employed
- Maintain records of legal working age for all employees

Forced or bonded labor

All forms of slavery, forced labor, misleading recruitment, and human trafficking are unacceptable. This applies not only to all work performed involuntarily, but also to cases of pressure, mental or physical threats or abuse, abuse of power and fraud.

If you as a Business Partners employ foreign workers on a contract basis, they must not be required to remain in employment against their will, and they shall further have the same rights as the local workers. The employer will pay for commissions and recruitment agency fees in connection with the employment where applicable. All workers shall have the right to leave their workplace and accommodation (if provided) freely during the hours when they are not working.

What we expect

- Maintain records of legal working conditions for all employees

Freedom of association and collective bargaining

CERTEGO expects all Business Partners to respect the rights of its employees to have the freedom to join, or not to join, an association of free choice as well as establish an association of free choice, to organize and to bargain collectively and individually in accordance with local laws and regulations. No employee should risk being harassed or retaliated against for exercising these rights. Instead, seek to foster a working environment, that allows for mutually constructive engagement.

What we expect

- Evidence that employees have the right to organize and bargain collectively
- Verification of functioning dialogue mechanisms between workers and management

Workers' contracts, working hours and compensation

CERTEGO expects its Business Partners to comply with local laws and regulations regarding workers' contracts, working hours, including overtime and overtime compensation.

Salaries should be paid regularly and comply with the applicable local legislation and the local market situation.

Workers should be entitled to a minimum of one day off in seven and to take time off for established national and local holidays. Workers should be granted the stipulated annual leave, sick leave and parental leave without any negative repercussions.

What we expect

- Labor contracts between employee and employer in languages familiar to the employees
- Record working hours, with specified overtime hours, unless otherwise agreed
- Keep record of paid wages, including overtime compensation

Discrimination, harassment and diversity

CERTEGO values and promotes diversity in the workplace, including personal, cultural and cognitive differences, gender balance and different work experience. Inclusion means that everybody should be treated with respect and be given fair and equal opportunities for development.

Therefore, we do not tolerate any form of discrimination or harassment in the workplace due to race, ethnicity, sexual orientation, gender, religion, age, disability, political opinion, nationality or any other potentially discriminatory factor.

What we expect

- Have procedures in place to report, investigate and sanction discriminatory behaviors without reprisal or retaliation
- Have practices implemented and communicated for recruitment, employment, non-discrimination and equal opportunities

Alcohol and drugs

CERTEGO works proactively to remove any workplace hazards. No work can therefore be conducted under the influence of any substance, including drugs and alcohol. In addition, every individual producing products and services for CERTEGO must ensure that you are free from any adverse effects due to medical, drug or alcohol use.

What we expect

- Have a drug and alcohol policy implemented and communicated

Consumer interest

CERTEGO requires that applicable health and safety requirements are met for its products and services, and our business partners shall take this into account when producing goods or providing services for us.

What we expect

- Follow international and local health and safety requirements

Responsible sourcing of minerals

CERTEGO is committed to promote responsible sourcing throughout our supply chain, including direct suppliers and sub-suppliers. Activities anywhere in the supply chain that contribute to conflicts or to serious human rights violations are unacceptable.

CERTEGO comply with relevant laws and regulations requiring disclosure of the use of conflict minerals. Conflict minerals are minerals from high risk and conflict-affected areas that have directly or indirectly contributed to financing of armed groups, where some groups are believed to be responsible for serious human rights violations. Goods provided to CERTEGO shall be in compliance with relevant laws and regulations regarding conflict minerals.

What we expect

- Source raw materials only from responsible sources
- Hold records that specify where products are produced, and by which material

Environment

CERTEGO set high standards regarding protection of the environment and biodiversity, mitigating climate change and fostering a culture of circularity. We expect the same from our Business Partners. Strive to reduce your consumption of resources, including energy, waste and water, prevent pollution, reduce noise levels and improve the overall environmental impact of your operations and products along the value chain. Furthermore, chemicals and hazardous materials shall be labeled properly and safely stored, and recycled, reused and disposed of correctly.

CERTEGO encourages all Business Partners to measure, document and plan for improvements regarding your environmental impact in the following areas:

- Greenhouse gas (GHG) emissions
- Emission to land and water
- Energy consumption
- Water consumption
- Chemicals and hazardous substances
- Waste handling

What we expect

- Keep and comply with all required environmental permits and licenses needed for your operations
- If applicable, implement certifiable environmental management systems or similar systems that facilitate your work with environmental issues
- Evidence of progress and ongoing activities to minimize the negative impact of your business on the environment

Health & Safety

Work environment

CERTEGO works systematically with health and safety and is committed to provide a safe work environment. A safe work environment means, for example, that work areas are kept clean and free from pollution, machines used in production are safe and do not risk the health of the workers, and instructions regarding the use of personal protection and work equipment are adhered to.

Personal protective equipment and work equipment shall be provided to the workers. Furthermore, the work environment shall be well lit, and have temperature and noise at acceptable levels. When noise is above acceptable levels, personal protective equipment such as ear protection shall be used. All units should provide adequate and clean changing rooms, washrooms and toilets.

We expect the same from our Business Partners.

What we expect

- Perform and keep records of regular health and safety risk assessments of the business
- Have a process implemented to manage health and safety risks
- Evaluate the efficiency of preventive and mitigating actions

Building and fire safety

Hazardous material and equipment must be stored according to applicable law. All workers shall receive information about the safety arrangements such as emergency exits, fire extinguishers, first aid equipment and other relevant actions. The fire alarm should be tested, and evacuation drills carried out on a regular basis.

What we expect

- Evacuation plan should be displayed on each floor of a building
- Emergency exits are maintained based on the size of the facility
- Exits must not be blocked and should be well lit
- Evacuation drills are carried out on a regular basis

First aid and medical care

First aid equipment must be available at appropriate locations, and at least one person in each location should be trained in basic first aid. Our Business Partner should cover the costs of medical care for injuries incurred at work if they are not covered by social security or insurance, provided safety rules have not been violated.

What we expect

- Relevant first aid kits are easily accessible
- Employees are trained in first aid

Certification

By signing this document, the partner declares that the company and all subcontractors used for goods and services supplied to CERTEGO operate in compliance with the content of this Code.

I, the undersigned, authorized signatory, or legal representative, confirm that the company has understood and will comply with the CERTEGO Code of Conduct for Business Partners.

Place, date

Company name

Signature

Name

Title
