



## GROUP ANTI-BRIBERY POLICY

May 2019 (as updated in November 2021)

### Executive Summary

The purpose of this Policy is to prevent *bribery*. *Bribery* is widely defined and can include common business practices such as *gifts* and *entertainment* whether involving a business partner or *public officials*. Most of us will be faced with situations potentially involving *bribery* in our day-to-day work and it is therefore critical that we understand what we can and cannot do.

This Policy covers:

- *Gifts and entertainment,*
- *Donations and sponsoring, and*
- *Relations with public officials.*

**Issuing Department:** Group Legal

**Owner:** Group CLO

**Version:** 1.2

## Introduction

We act with honesty, respect and with integrity. We do not cheat or seek to influence in illegitimate ways. We make our business decisions based on proper business grounds without being influenced.

The purpose of this Policy is to prevent *bribery* in any form, whether in relation to business partners or *public officials*. *Bribery* is the giving or receiving of something of value, in exchange for an action in return that the recipient would otherwise not offer. In fact, even common business practices or social activities, such as offering *gifts* or *entertainment*, can be seen as *bribery* if done with the purpose or effect of improper influencing.

*Bribery* is not in line with Verisure's DNA and ways of doing business. It dilutes public trust in businesses and government, and is deemed a crime in nearly all countries around the world. Prosecutors aggressively investigate suspected violations, while breaches lead to large financial penalties, imprisonment and severely damage reputation and trust in the business.

In addition to complying with this Policy we are committed to complying with all applicable anti-bribery laws. Additionally, local country management may implement more restrictive rules.

When in doubt, always ask Legal.

All *italicized* words can be found in the definitions section of this document.

## Key Principles

<b>Never offer or give anything of value to get an undue advantage</b>	Do not offer or give anything of value (gifts, entertainment, cash payments, grants or favors for family members, etc.) in order to influence someone's professional objectivity in taking a decision or reaching an outcome to Verisure's advantage.
<b>Never request or accept anything of value that might influence your objectivity in doing your job</b>	Do not request or accept anything of value (gifts, entertainment, cash payments, grants or favors for family members, etc.) that might influence, or be perceived as influencing, your objectivity in taking a business decision or reaching a business outcome (e.g., as part of a request for tender process).
<b>Make sure that all <i>gifts</i> and <i>entertainment</i> offered and received are reasonable</b>	<p>Providing and receiving reasonable <i>gifts</i> and <i>entertainment</i> is often an appropriate way to reflect esteem or gratitude or to build a stronger business relationship. Nonetheless, gifts and entertainment require careful review to ensure they are reasonable, each instance individually and in totality, and consistent with local law and practice.</p> <p>Before promising, offering or receiving <i>gifts</i> and <i>entertainment</i>, always ask yourself if this could be viewed as illegitimate. If the answer is yes or maybe, don't promise, offer, or accept the <i>gift/entertainment</i>.</p>

<b>Do not offer <i>facilitating payments</i></b>	Do not offer payments, whether cash or in kind, to a <i>Public Official</i> to expedite action that the <i>Public Official</i> should routinely take (e.g. issuing a visa after all requirements have been met).
<b>Always get prior approvals for <i>donations</i> and <i>sponsorships</i></b>	<p>We do not provide <i>donations</i> or <i>sponsorship</i> with the aim of getting a commercial advantage.</p> <p><i>Donations</i> and <i>sponsorship</i> by the Company may not be provided to individuals but only to organizations. <i>Donations</i> must be approved by the Country Head in the relevant country beforehand. <i>Sponsorships</i> must be approved beforehand by the Head of Marketing in the country in question.</p>
<b>Political contributions</b>	We do not make <i>political contributions</i> .
<b>Regulatory Advocacy</b>	<i>Regulatory Advocacy</i> should not be misused for corrupt or illegal purposes, or to improperly influence decisions.
<b>Be prudent with third parties acting on our behalf</b>	Apply prudence whenever contracting for services where the risk of bribery exists, such as customs services, product certifications, and <i>regulatory advocacy</i> . Engagement of <i>third parties</i> must never be used to get an improper business advantage for <i>Verisure</i> .

## Who Must Follow This Policy

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

## How do I comply?

### I. Gifts and Entertainment

*Gifts* are anything of value that you provide to, or receive from, a third party (bottles of wine, chocolate, branded items, etc.). *Entertainment* includes hospitality (drinks, meals, travel, accommodation, etc.) and/or events (attendance at plays, concerts and sporting events, etc.).

We can only offer and receive *gifts* and *entertainment* if they are modest, reasonable, and infrequent for the people involved.

Before promising, offering or accepting *gifts* and *entertainment*, always ask yourself if this could be viewed as illegitimate. Could the person receiving it be influenced into giving something in return that he/she would otherwise not have offered? If the answer is yes or maybe, do not promise or offer the *gift/entertainment*. Good judgment is key. In some cases the risk of appearance of illegitimate intent occurs easily, for example if:

- the recipient has recently decided or will shortly decide on a matter relating to Verisure's business, or
- the nature or extent of a *gift* or *entertainment* is lavish and beyond customary – whether local or international – business practice.

Never offer or provide a *gift* or *entertainment* that may embarrass the recipient or that you believe the recipient may not accept, whether by law, regulation, an ethics code or a Policy that the recipient has an obligation to follow (e.g. a code for public officials or other influencers). The same rule applies to a *gift* or *entertainment* that is in bad taste, sexually oriented or can embarrass the Company.

Never give or accept *gifts* in cash or other monetary instruments or cash equivalents, such as money orders. Never accept *gifts* from third parties participating in tenders or requests for proposals.

In conclusion, all *gifts* and *entertainment* are subject to careful consideration. First and foremost, it is your responsibility to use good judgment and common sense before offering or accepting a *gift* or *entertainment*.

Always consult the local Policies on *gifts* and *entertainment* and contact Legal if you have questions.

Local Management sets local standards or guidance with detailed rules on *gifts* and *entertainment*. These should include maximum amounts for offering or receiving *gifts* and *entertainment*. Local standards and guidance can be more restrictive than this Policy, but never more lenient. This Policy applies along with the local rules. If there is a discrepancy, the more restrictive applies.

## II. Public officials and facilitating payments

While we do not distinguish between private individuals or *public officials* when dealing with *bribery*, questions of *bribery* become particularly sensitive when *public officials* are involved. In contrast to most private individuals, *public officials* are empowered to grant authorizations, licenses and privileges of relevance to our business. They are also subject to special rules of conduct and exercise of powers. Therefore, any interactions with *public officials* must be treated with utmost caution to avoid any real or perceived improper influence.

Based on the foregoing, we must not give any *gifts* to *public officials*.

In terms of *entertainment*, all such initiatives must (i) fully comply with the rules set forth above under Section 1, (ii) be approved in advance by the Head of Legal responsible for your business or location, and (iii) be properly documented, accounted for and disclosed when necessary. Additionally, all *entertainment* and other interaction with *public officials* must comply with the rules and regulations of the *public official's* country.

Additionally, do not offer or give a *facilitating payment*. If a *public official* requests a *facilitating payment*, refuse even if there would be negative business consequences. If you face a difficult situation, contact Legal to help resolve the matter appropriately. The rule against *facilitating payments* does not apply if a payment is truly necessary to protect against physical injury or loss of freedom. You must promptly report any such *facilitating payments* – Legal can help you with the reporting. The foregoing does not prevent us from paying legally required administrative fees, or fees to speed up a service, but only if they are published on an official price list.

### **III. Donations, Sponsoring and Political Contributions**

*Donations* are gifts in the form of money or in-kind. *Sponsoring* is an agreement in which the sponsored organisation or event will, for payment, promote the image of *Verisure* or its products.

Requests for *donations* and *sponsoring* must be handled with caution to avoid the perception of bribery or conflict of interest. This is especially the case when there is an existing relationship, or when there are commercial discussions pending between the requester, and *Verisure* or one of its employees.

We must not sponsor organizations, events, or make *donations* with the aim of obtaining an undue commercial advantage. We will only consider *donations* and *sponsoring* for organizations that are consistent with our DNA and ideally somehow connected with our business (e.g. safety of women).

*Donations* and *sponsoring* may not be provided to individuals.

*Donations* must be:

- approved by Country Head;
- to local charitable organizations;
- to a known beneficiary, in good legal standing, not involved in criminal activities, and registered in the country, and
- consistent with our DNA.

*Sponsoring* must be:

- approved by the Head of Country;
- properly documented (sponsorship agreement), and
- consistent with our DNA.

*Political contributions*

We do not make *political contributions*.

### **IV. Regulatory Advocacy**

*Regulatory Advocacy* refers to our contacts with policy makers and other external stakeholders in order to promote our perspectives.



Active contributions to Policy making is a legitimate activity that is part of the democratic process. We engage in *regulatory advocacy* activities to provide policy makers with information concerning security and other topics relevant to our business. *Regulatory Advocacy* should not be misused for corrupt or illegal purposes, or to improperly influence decisions.

All interactions we have with *public officials* on behalf of a Verisure company must be transparent, fact-based, with integrity, and in accordance with this Policy and applicable laws.

Group Legal can provide guidance on how *Regulatory Advocacy* should be conducted.

## V. Third parties

We can be held liable not only for our own actions, but also that of *third parties* engaged in *bribery* or interacting with *public officials* on our behalf violate anti-bribery laws. Examples of such third parties include government relations consultants, immigration consultants, customs brokers, security and logistics service providers, public affairs agencies and even industry bodies.

Therefore, never ask or suggest a third party to do anything for us that we are not permitted to do ourselves. It is as illegal as carrying out the activity ourselves.

Additionally, in order to establish and document the necessary controls before engaging a third party that you expect will interact with *public officials* on Verisure's behalf, you must ensure that a written contract is entered into with that third party that clearly defines the scope of services, invoicing requirements, Verisure's antibribery standards (with this Policy as an annex), authorization requirements for *entertainment of public officials* on the Company's behalf, audit rights and a clause allowing termination for non-compliance.

Any Company employee who manages the relationship with a *third party* that interacts with *public officials* on Verisure's behalf must exercise due care to ensure that all relevant *third party* personnel understand our compliance requirements and how they apply to their activities.

## Who does what?

Function	Responsibilities
Everyone	Must comply with this Policy and speak up in case of questions, doubt or concern.
Group Board	Ensures that <i>bribery</i> risks are identified, understood, effectively managed, and oversees the development of an anti- <i>bribery</i> culture across the <i>Group</i> .
Country Management Teams	Identify, mitigate, and manage <i>bribery</i> risks relevant to their businesses.
Legal	Provides legal advice on anti-bribery laws and advises on specific situations. Oversees and coordinates the training and communication programs on <i>bribery</i> . Assesses requests for <i>gifts, entertainment,</i>

	<i>donations</i> and <i>sponsoring</i> as required by the Policy and local Policies or standards.
<b>Local Compliance Committee</b>	Investigates and analyzes suspected <i>bribery</i> , reporting to the Group Compliance Committee, and suggesting change and prevention measures to the Country Management Teams.  Provides tools and training, regular communication, templates, and procedural guidelines.

## Questions and Support

Please contact Legal if you have any questions.

### Reporting of potential misconduct

You can raise your concern anonymously through the independent Speak Up channel by submitting a report through <https://verisurespeakup.com>. Reports submitted through this address will be processed and anonymized by a professional third party before being shared with Verisure.

## Definitions

<b>Bribery</b>	Offering, promising, giving, requesting or accepting anything of value in order to influence someone's actions in his or her official capacity – whether in government or a company – for business benefit. Doing the same indirectly through intermediaries (e.g., third party consultants) is also bribery.
<b>Donations</b>	Something of value such as money or goods that is given as contribution to a person or organization.
<b>Entertainment</b>	Travel, lodging, meals or hospitality that you provide to, or receive from, a third party.
<b>Facilitating Payment</b>	A small payment, whether cash or in kind, to a <i>public official</i> to expedite action that the <i>public official</i> should routinely take (e.g., providing physical security or police protection or issuing a visa after all requirements have been met).
<b>Gift</b>	Anything of value, other than <i>entertainment</i> , that you provide to, or receive from, a third party in connection with your job.
<b>Political contribution</b>	Contributions to a candidate for public office, a political party, a political committee or a ballot initiative committee. This definition includes purchasing tickets to political fundraising events, such as dinners.



**Public Official**

(i) Any person holding a legislative, administrative or judicial office, whether appointed or elected, (ii) any person exercising a public function, including for a public agency or a publicly-owned enterprise, and (iii) any official or agent of a public international organization (OECD definition). If you are not sure whether someone is a Government Official, consult with Legal.

**Regulatory Advocacy**

The contacts we have with policy makers and other external stakeholders, including direct or indirect communications with *public officials*, to influence public policies, laws, regulations, public positions, policy-related actions or other official acts.

**Sponsoring**

An agreement in which the sponsored organization or event will, for payment, promote Verisure products, brand, or the image of Verisure.