



## Group Speak Up Policy

March 2022



### Executive Summary

This Policy explains what types of suspected misconduct you should Speak Up about and how you can raise your concern. It also outlines the protections available to you and what you can expect from us when you Speak Up.

The Speak Up Policy is available to employees and certain third parties who wish to raise a concern about possible misconduct within the Verisure Group. This Policy sets the minimum requirements of what must be followed throughout the Group and may be coupled in some countries by stricter legal requirements or policies and standards. In case this Policy conflicts with applicable local law, local law will prevail.

**Issuing Department:** Group Legal

**Owner:** Chief Legal Officer

**Version:** 1.0



### Introduction

**In our Verisure community, all of us are committed always to operate With Trust and Responsibility. We always Do The Right Thing. By Speaking Up if you have a genuine suspicion of misconduct, you can help end behaviours that could risk damaging the Company. Remaining silent in those circumstances may cause real harm to other colleagues, our customers, or other stakeholders. It is also a missed opportunity to achieve positive change and reinforce the right behaviour. We therefore all have a responsibility to Speak Up.**

Our customers trust us with their lives and what matters most to them. In doing so they expect us to conduct our business in a manner that reinforces that trust.

Our colleagues trust us to maintain a respectful working environment where each one can bring the best of themselves every day.

It is up to all of us to live up to these expectations and to Speak Up about suspected violations of our Code of Conduct, our policies and standards, or applicable laws.

We do not tolerate retaliation. We will not allow retaliation against a colleague who Speaks Up in good faith.



### Key Principles

- We count on our colleagues to take responsibility for their own actions and Speak Up if they observe possible violations of our Code of Conduct, our policies and standards, or applicable laws. We count on them to not undertake investigations of their own.
- We count on our colleagues to Speak Up in good faith.
- We are committed to keeping confidential the identity of those Speaking Up. The same applies for information about persons involved in, concerned by or handling a concern. We will only share such data on a need-to-know basis.
- We make available our Speak Up Platform for those wanting to raise concerns, including anonymously.
- We are committed to ensuring the integrity of investigations and related processes.
- We will always presume good faith on the part of all persons involved, unless demonstrated otherwise. At the same time, we do not tolerate reporting in bad faith.
- We do not tolerate any form of retaliation against those Speaking Up in good faith.



### Who can Speak Up?

This Policy is applicable to the following persons who wish to Speak Up about possible misconduct at Verisure:



**Colleagues** at any legal entity in the Verisure Group, namely:

- Employees
- Contract workers and temporary employees
- Volunteers and trainees
- Members of management or board



The following **third parties**:

- Suppliers and subcontractors
- Shareholders
- Former employees
- Prospective employees who have started the recruitment process or negotiations to join a legal entity in the Verisure Group \*

\* Prospective employees may report suspicions of misconduct relating only to information which has become available to them during the recruitment process or other pre-contractual negotiations.



### What to Speak Up about?

If you have a reason to suspect genuine misconduct in our Company, we encourage you to Speak Up about it. Misconduct includes any violation of our Code of Conduct, our internal policies and standards, or applicable laws in the work environment of our Company.

A reason to suspect genuine misconduct means that you are raising your concern in good faith and have reasonable grounds to believe the suspicions you are reporting are true, considering the circumstances and information available to you when you Speak Up about it.

You should Speak Up about concerns relating to any suspected breaches of our Code of Conduct, our internal policies and standards, or applicable laws, in particular:

- Retaliation
- Harassment, including sexual harassment and bullying, and discrimination
- Risks to health and safety
- Intentional breaches of data privacy
- Sales fraud or malpractices
- Product safety breaches
- Bribery and corruption
- Financial crime, including money laundering and fraud
- Conflicts of interests
- Unfair competitive behaviours, including breach of competition law
- Serious environmental damages
- Human rights breaches

The Speak Up process should not be used to report personal work-related grievances, which should instead be raised directly with your line manager or your HRBP. However, work-related grievances that either constitute harassment or discrimination under our Code of Conduct or that otherwise involve a breach of our Code of Conduct, internal policies and standards, or applicable laws can be handled via the Speak Up channels.

**We have a zero-tolerance approach to retaliation for a concern raised in good faith.** At that same time, **we do not tolerate reports raised in bad faith.** This means reports which are not based on a genuine belief that the suspicions reported are true. An individual who raises a report in bad faith will not be protected from potential retaliation and may face disciplinary measures.



## How to Speak Up?

**We encourage you to reach out to your line manager or HRBP as soon as possible if you have a concern to raise. In many cases, they will be best placed to follow up on your concern.**

But there may be situations where you do not feel comfortable speaking to your line manager or HRBP. In these cases, you can reach out to a member of the local or Group HR or Legal / Compliance teams. If appropriate, given the nature of your concern, you may also raise it directly with the relevant local or Group Management Team member. You can request a meeting with any of these persons should you be more comfortable speaking to someone in person.

Additionally, you can use our Speak Up Platform to raise your concern in writing, including anonymously. Reports raised through our Speak Up Platform will be reviewed by members of the Group HR and Legal / Compliance teams and, if an investigation is opened, investigated by an appointed Case Manager. You will be given the opportunity to indicate if a member of Group HR or Legal / Compliance team is involved in the suspected wrongdoing to ensure the report is properly redirected. You will be referred to as “Reporter” when using our Speak Up Platform.

Regardless of how you Speak Up, if you raise your concern in writing, you will receive a confirmation of receipt within a maximum of seven days.



### What is our Speak Up Platform?

Our Speak Up Platform is a secure online reporting platform, which can be used to report concerns in writing, including anonymously. It is available 24/7, is hosted by an external service provider and uses data encryption.

By reporting your concern internally through any of these channels, you help us to address the suspected misconduct rapidly and take the necessary corrective measures. In this way, we truly can improve our Company together.

As the case may be, you can also raise your concern with your employee representative (i.e., trade union representative or employee representative within your company) (where applicable) or with the competent national authority.

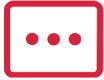
To summarise, there are many ways for you to Speak Up, including:

- To your line manager
- To your HRBP
- To a member of local or Group HR or Legal / Compliance teams
- To the relevant member of local or Group Management team
- Using <https://verisurespeakup.com> or <https://securitasdirectspeakup.com>
- To your employee representative, where applicable



### Will I receive feedback when I report?

We will update you regularly on the progress of the investigation. When the investigation is completed, we will provide high-level feedback on its outcome. We will not be able to give you the full details of the outcome and actions taken to maintain the confidentiality of the investigation and to protect the persons involved.



### What information to include when Speaking Up?

The more information you can provide when raising a concern, the easier it will be for us to act on your Speak Up. This does not mean you should investigate on your own to find information, as doing so may harm you or other colleagues.

We encourage you to provide your identity when reporting a concern. This may make it easier to act on your Speak Up. That said, should you wish to report a concern anonymously, you can use our Speak Up Platform to do so.



Your report should contain as much information as you can provide to allow the Case Manager to follow up on it. Useful information includes:

- Date, time and location,
- Person(s) involved, function and location,
- Relationship with the other person(s) involved,
- General nature of the concern,
- How you became aware of the suspected misconduct,
- Possible witnesses, and
- Other information to support the report.

If you need guidance on whether to raise a concern, before doing so, you should reach out to the relevant contact in your HR or Legal / Compliance team.



### How do we protect you after Speaking Up?

We understand it takes courage to Speak Up and we value your help in bringing concerns of misconduct to our attention. This is why we do everything we can to ensure you are protected when you report a concern:

- We strive to keep your identity confidential, sharing it only on a need-to-know basis
- You can report a concern anonymously

- We do not tolerate any form of retaliation against you
- We protect your personal data

### Confidentiality

We are committed to keeping your identity and any information which is likely to lead to your identification confidential. Information will only be shared on a “need-to-know” basis with those responsible for investigating or resolving the Speak Up.

During an investigation we may need to inform the person concerned by the Speak Up about the investigation. Your identity will not be disclosed to the person concerned, unless necessary. You will be informed beforehand if this is the case. Whenever possible, you will be given the opportunity to withdraw your concern if you are not at ease with this course of action.

There may also be situations when we are legally obliged to disclose information, for example if the report has led to an investigation by the authorities or criminal proceedings being opened.

You can support us in maintaining confidentiality by not discussing your concern with colleagues or anyone else.

### Anonymous reporting

While we encourage you to provide your identity when Speaking Up, we understand that you may feel more comfortable remaining anonymous. Our Speak Up Platform will give you access to an anonymous Speak Up inbox through which we can communicate with you. This platform also allows for supporting files you may provide to be cleaned of potentially identifiable metadata.

### Non-retaliation

**We have zero-tolerance to retaliation for Speaking Up in good faith.** This includes retaliation against you when raising a concern and against related persons. We take allegations of retaliation very seriously and any person found to have engaged in any form of retaliation will face disciplinary measures, up to termination of their employment contract.

If you feel you are being retaliated against for having raised a concern in good faith, you have a responsibility to report it.

### Personal data

We protect the privacy of everyone involved and take all necessary measures to safeguard personal data from unauthorized access and processing. Any personal data collected through the Speak Up process will be used only for the purpose outlined in this Policy or as needed to ensure we comply with applicable laws. More details are set out in our privacy notice.



### What will happen when a report is filed?

**We take every Speak Up raised under this Policy seriously. When raised, we will assess the best way to handle it based on the information provided and may open an investigation.**

We are committed to handling each Speak Up raised under this Policy:

- Objectively and fairly
- Confidentially
- Respectfully of all parties involved
- As quickly and efficiently as the circumstances permit
- Without prejudice against the person concerned
- In accordance with applicable laws and principles

Details of the case are shared only on a need-to-know basis throughout and after the investigation.

In some cases, we may be required to share information by law. In these cases, where allowed, we will inform you before sharing data which relates to you.

We will keep you updated on the progress and provide you with a high-level feedback on the outcome.

#### Process:



#### **We receive your concern**

If you raise your concern in writing, we will send you a confirmation of receipt within a maximum of seven days.



#### **Initial assessment**

The initial assessment will check whether your concern is in scope of the Speak Up Policy, if a more detailed analysis is required and if sufficient information has been provided to open an investigation.

For concerns raised through other channels than our Speak Up Platform, the person you have reached out to will contact you directly if any further information is required for the initial assessment. For concerns raised through our Speak Up Platform, you will be contacted through your Speak Up inbox if any further information is required.



#### **Investigation**

If an investigation is required, a Case Manager will be appointed to lead it.



## Speak Up Policy

The Case Manager may be a member of local or Group HR or Legal / Compliance teams. The Case Manager may be supported in the investigation by external investigation experts or functional specialists from within the Company.

Anyone called on to support the investigation is held to strict confidentiality.



### Closure

If the investigation confirms the misconduct, we will take the appropriate measures to put an end to the misconduct and take appropriate disciplinary measures, up to termination of employment contracts.

The Case Manager will contact you with high-level feedback when the investigation is completed and before closing the case.

Once the case is closed, the Case Manager may contact you again to ensure you are not facing any retaliation.



### Remember

Whenever our Speak Up Platform has been used, please check your Speak Up inbox regularly, in case we have sent you an update or further questions.

### More Information

## Protection against retaliation

### What is retaliation?



Retaliation is any direct or indirect act or omission which occurs in a work-related context, is prompted by internal or external reporting or by public disclosure, and which causes or may cause unjustified harm to the person having raised concern under this Policy.

Acts and behaviours which may be signs of retaliation include:

- Harassment, intimidation, discrimination, disadvantageous or unfair treatment
- Dismissal of an employee or alteration of an employee's position or duties to his or her disadvantage
- Negative performance feedback that does not objectively reflect actual performance
- Withholding promotion or training opportunities, without a valid reason
- Other disciplinary action like transfer of duties, change of location, reduction in wages, change in working hours, to the employee's disadvantage
- Physical harm, or harm to the person's reputation, including in social media
- Blacklisting

Threats of retaliation and attempts at retaliation are a form of retaliation as well.

### Who is protected against retaliation?



We do not tolerate any form of retaliation against:

- You when you Speak Up in good faith
- Any facilitator, i.e., anyone who assists you in reporting your concern
- Any witness, i.e., anyone who provides input to the investigation as part of the investigation process
- Any third person who is connected with you and who could suffer retaliation in a work-related context, such as colleagues or relatives
- Any Legal Entity that you own, work for, or is otherwise connected with a work-related context

**How to use our Speak Up Platform?**

**Submit a report**



You can submit a report in your native language and anonymously. The option of anonymous reporting may not be available in certain countries due to national restrictions, in which case you will be informed of these restrictions.

**Communicate**



You may communicate with the appointed Case Manager using your Speak Up inbox. We recommend that you check your Speak Up inbox regularly.

**Who does what?**

Responsible Group	Description
<b>Everyone</b>	Must comply with this Policy in terms of Speaking Up in case they have concerns about a breach of our Code of Conduct, our policies or standards, or applicable laws.
<b>Group Board</b>	Oversees the development of a Speak Up culture across our Company.
<b>HR and Legal teams</b>	Comply with this Policy in handling Speak Up cases and related investigations.  Provide advice on Speak Up and related investigations.
<b>Managers and Leaders</b>	Ensure that their teams understand and comply with this Policy and related guidance documents.  Strive towards a work-environment where Speak Up takes place.  Support, cooperate and sometimes lead investigations and/or disciplinary processes in compliance with this Policy.

**Questions and Support**

For further questions and support please contact any member of the Group HR or Legal / Compliance teams.

## Version Control

### Version History

Version	Effective Date	Status	Approver and date of approval
1.0	March 2022	Original version	Group Compliance Committee (March 2022)