

SECURITAS ČR s.r.o. Business Partner Code of Conduct

1 Why a business partner code of conduct?

The Company SECURITAS ČR s.r.o. (hereinafter referred to as “SCR”) is a member of the global Securitas Group, offering services in the sphere of commercial security at a worldwide level. The Securitas Group is a signatory to the United Nation’s Global Compact initiative and promotes and upholds the principles set out in the United Nations Universal Declaration of Human Rights and in the United Nations Guiding Principles on Business and Human Rights (including the rights specified in the International List of Rights). It recognises its responsibility in asserting and upholding these principles in carrying out international business.

SCR places considerable emphasis on ethics, integrity, and adherence to regulations. We endeavour to make sure that our business activity is always conducted in a sustainable way and in accordance with our fundamental values, honesty, vigilance, and utility. We undertake to maintain the highest standards of integrity and to adhere to valid laws, rules, regulations, and all codes of conduct.

This Business Partner Code (hereinafter referred to as the “Code”) has been created to give our business partners a clear view of the values and principles that underpin all our work. It outlines the minimum standards which SCR requires that its business partners uphold in doing business. The standards set out in this Code draw on internationally recognised treaties and agreements.

2 The Business partner code applies to all contractors, subcontractors and business partners of SECURITAS ČR s.r.o.

This Code applies to all contractors, subcontractors, agents and business partners of the company SCR (hereinafter referred to as “Business Partners”). For the purposes of this Code, business partners shall include servicing partners, consultants, intermediaries, and similar parties that represent and/or provide goods or services to SCR.

Business Partners are obliged to adhere to all valid laws and technical standards, as well as the rules laid down in this Code. They must have in place all permits, licences, approvals, and registrations required by the law.

It is the responsibility of each and every Business Partner to meet the requirements of this Code and to pass on the same or equivalent requirements to their business partners, employees, functionaries, managers, or authorised representatives, without exception, in all dealings and transactions to concern SCR.

Consistent adherence to this Code shall be taken into consideration when selecting and evaluating Business Partners.

Under no circumstances shall Business Partners be governed by any orders, requirements, or instructions which could mean breach of the provisions of this Code.

Should a Business Partner fail to adhere to the Code and such failure to adhere is not negligible, SCR reserves the right to terminate the contract and business relationships with the Business Partner.

3 Inform us

Business Partners are obliged to report cases of failure to adhere to this Code to SCR. SCR undertakes that any report of breach of this Code shall not have a negative impact on the reporter.

Breach of this Code may be reported to SCR using the Securitas ČR Integrity Line:



E-mail: integrity@securitas.cz

Telephone: +420 284 017 017

Other contact details are provided at the SCR website: www.securitas.cz.

4 Human rights and working conditions

Business Partners. Business Partners guarantee that they shall take no part in violating human rights.

Business Partners are strictly prohibited from employing persons who are younger than the set minimum age for employment (15 years of age) and who have not yet completed compulsory education. Workers aged between 15 and 18 years may not be employed for dangerous or heavy work.

Business Partners are strictly prohibited from participating in or tolerating modern slavery and exploitation, including human trafficking. This means that they shall not operate or tolerate any restriction of movement, confiscation of proof of identity, excessive fees for recruitment, bonds, withholding of wages, violence, or any other exploitation or abuse.

Business Partners are expected to have clear, written conditions for their employees. Business Partners must adhere to the valid laws to concern working times and the rules of rest time. Business Partners must pay wages on time and provide benefits which match or surpass the statutory minimum standards, collective agreements, or corresponding business standards.

SCR respects the rights of all employees to decide whether or not they shall be represented by a trade union organisation in collective bargaining, and to establish and enter trade union organisations or workers' associations at their own discretion and in accordance with local laws and regulations. No employee should be exposed to harassment or reprisals for exercising these rights. SCR expects its Business Partners to do the same.

Business Partners must create a safe work environment that is non-detrimental to health. Business Partners are expected to have in place the corresponding systems for the prevention of occupational injuries and occupational illnesses. Employees should undergo the corresponding training and receive instructions and equipment in order that occupational health and safety is maintained.

SCR is an equal opportunities employer. It must treat all employees fairly and equally, without any discrimination or any form of harassment. SCR expects its Business Partners to promote equal opportunities and the elimination of discrimination in employment.

5 The Ethics of doing business

SCR is governed by the principles of integrity, honesty, and fairness. We are determined to promote and assert the highest ethical business standards in all aspects of our business activity. It is expected that all Business Partners shall act honourably and honestly and shall not participate in any unfair action or practices, anti-competitive conduct included.

SCR has zero tolerance for all forms of bribery and corruption. Business Partners must not seek accept, or have business advantages based on unlawful, inappropriate, or unethical conduct. This also applies to Business Partners acting for or on behalf of Securitas. Business Partners are obliged not to accept any types of corrupt practices or bribes and it is expected that they shall adhere to the corresponding system of preventing corruption.

Business Partners may not provide SCR employees or any third party with any gifts, excursions, food or drink, or hospitality in situations in which this could influence any decision-making by employees or third party in relation to Business Partners.

Business Partners shall not participate in money-laundering and terrorist financing, shall not promote them, and shall not facilitate them.



Business Partners shall put systems in place which prevent violation of legal regulations in the sphere of competition. They may not participate in any modification of offers, pricing, cartel activity, or trading in inside information.

Business Partners are obliged to adhere to valid regulations relating to trade sanctions, including those published by the United Nations, the United States of America, and the European Union.

Business Partners must protect the privacy of employees, representatives of customers, representatives of business partners, and other individuals and process personal data in accordance with the law, with justification and transparently.

Business Partners are obliged to prevent situations in which there is an actual or potential conflict of interests between SCR and the Supplier or a closely related party, and to inform SCR of such situations.

Business Partners shall protect SCR's confidential information and intellectual property rights and must keep confidential all information to which they have access in executing their work, providing services, or supplying goods to SCR, even in the case that such information about SCR is not confidential. Business Partners must act in such a way as to prevent the misuse of information, theft, fraud, or improper disclosure.

If Business Partners are informed about important, non-public information to concern the Securitas Group or its business activity, they may not purchase, sell, or otherwise trade in Securitas Group securities. Neither may Business Partners take any steps which would result in Business Partners misusing such information for their own gain.

Accurate and reliable information and records are crucial in fulfilling SCR's financial, legal, and administrative obligations and are necessary for fair consideration of transactions at SCR. A Business Partner must keep accurate records of all matters associated with business between that Business Partner and SCR. This includes the proper, fast, and complete recording of all costs and payments and the availability of supporting records and documentation.

6 Environmental sustainability

SCR endeavours to carry out its business in a sustainable manner, with respect for and regard to the environment. We should work in such a way that we contribute toward a more sustainable future.

Business Partners must ensure that they adhere to all valid laws and regulations relating to the environment. SCR expects that Business Partners shall take a preventive approach to environmental challenges by taking steps in support of greater responsibility for the environment.

7 Adhering to laws

Business Partners are responsible for the fact that their managers, senior members of staff, employees, and subcontractors or representatives understand and adhere to valid laws and regulations to the extent applicable to the relevant agreement or business relationship.

8 Implementation and checking

This Code is an integral part of contractual terms and conditions between SCR and its Business Partners.

SCR reserves the right to ask Business Partners for regular information and to conduct inspections and/or audits (with the support of a third party or without) at facilities, in the relevant books and records, so that the Business Partners' compliance with the Code is proven. SCR shall strive to give reasonable notice prior to such information requests. Business Partners are not obliged to disclose information which is subject to confidentiality due to applicable laws and regulations or under contract. Information requests, including inspections and/or audits, shall be subject to proper confidentiality undertakings.



9 Validity

This Code version 2 is valid from 14th of November 2022.

In Prague

.....
Business Ethics Compliance Officer