



# Gunnebo Group Supplier's Code of Conduct

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# 1 Introduction

Gunnebo's vision is to be the leading provider of a safer future by supplying solutions protecting people, valuable and assets. We strive to have the best security products that make a difference by managing cash securely in societies, protecting assets or controlling flows of people. The group's mission is to create a SAFER WORLD - for its customers, business partners, employees and society as a whole.

As reflected in our own Code of Conduct, we are committed to high standard of integrity and sustainability and we expect our suppliers to adhere to similar standards and to conduct their business ethically. This Supplier Code of Conduct defines those principles.

We expect all of our suppliers and subcontractors to comply with all applicable laws and regulation, the requirements which are expressed in this Supplier Code of Conduct and their contractual obligations to us. All those are an important part of supplier selection and evaluation. We also expects our suppliers to duplicate these principles further down the supply chain.

# 2 Ethics

Gunnebo group is committed to the highest standard of business integrity. We do not tolerate any practice not consistent with the principles of honesty, integrity and fairness, anywhere in the world where we do business.

## Business Integrity and Anti-corruption

We expect our suppliers not to practice or tolerate any form of corruption, extortion or embezzlement. Suppliers will not offer or accept bribes, gifts, entertainment, compensation, personal favors or other unlawful incentive to/from their business partners.

## Conflicts of Interest

A conflict of interest arises when personal interests or activities conflict with, or appear to be in conflict with, the best interests of Gunnebo Group or the supplier as organizations. We expect our supplier to disclose us any apparent or actual conflict of interest regarding their relationship with Gunnebo Group.

## Data Privacy

When processing personal information, Suppliers must comply with applicable data privacy laws and regulations, especially in Europe with the EU General Data Protection Regulation (GDPR) 2016/679. Suppliers must only process the minimum amount of personal data to perform its obligation to the Gunnebo Group.

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### Fair Competition

Suppliers shall compete in a fair manner in compliance with all applicable competition laws and regulations.

### Intellectual property and Confidential Information

Suppliers must not share or disclose Gunnebo Group's intellectual property or confidential information with any third party without any written consent from Gunnebo Group.

Exchanges of confidential information between Gunnebo Group and its suppliers will be pursuant to a written confidentiality agreement and will be limited to the purpose of fulfilling contractual obligations.

### Conflict minerals

We require our suppliers to ensure that products supplied to Gunnebo Group do not contain any metal derived from minerals or their derivatives originated from conflict regions that directly or indirectly finance or benefit armed group.

### Violation reporting

Supplier's employees shall be encouraged to report concerns or potentially unlawful activities. Such report should be treated confidentially, investigated and satisfactorily resolved.

## 3 Labor and Human rights

Gunnebo Group acknowledges and respects the principle contained in the United Nations Declaration of Human Rights. We expect our suppliers to conduct their business in a manner that demonstrates respect for human rights, consistent with the principles below.

### Child labor

We do not tolerate child labor in our supply chain. Suppliers must ban any sort of child labor in their business operations consistent with the ILO's (International Labour Organization) core labor standards, the United Nations Global Compact principles and local laws and regulations.

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### Freely chosen employment

Suppliers shall not engage in or support forced, bonded or compulsory labour. Suppliers shall ensure that work is performed voluntarily in exchange for lawful compensation. Suppliers shall not confiscate or require any form of deposit of identification papers from employees. Workers must be free to consent to enter employment and free to leave the employment at any time, with reasonable notice in accordance with applicable laws.

### Non-discrimination and fair treatment

Suppliers shall not discriminate against employees in hiring, promotion, salary or any other term or condition of work, on the basis of race, gender, age, disability, marital status, sexual orientation, pregnancy, nationality, caste, affiliation with a political organization, national origin, veteran status, religious or union organization, minority group or any other characteristic protected by law.

Suppliers must treat their employees, partners and workers with dignity and respect. Suppliers will provide their employees with a workplace free of harsh and inhumane treatment, without any sexual harassment, sexual abuse, corporal punishment or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment.

### Working hours, wages and benefits

Suppliers shall comply with all applicable laws and regulations for working hours of employees, including maximum hours limitation and requirements for break times and days off work.

Suppliers shall ensure that compensation paid to its employees complies with all applicable wage laws, including those relating to minimum wages, overtime hours and mandatory benefits. Compensation and benefits should aim at providing an adequate standard of living.

### Freedom of association

The supplier shall respect its employees' right to freely associate and bargain collectively in compliance with all applicable laws and regulations.

## 4 Quality, Health, Safety and Environmental Management

Gunnebo Group expects its suppliers to integrate Health, Safety, Environmental and Quality management principles into their business processes.

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### Health & Safety

Suppliers shall provide their employees a safe and healthy working environment in compliance with all applicable laws and regulations. Appropriate controls, procedures, informations, trainings and equipments shall be provided to mitigate health and safety risks.

### Environment

Suppliers shall comply to all local applicable environmental laws and regulations. Operations must be conducted with an objective of reducing waste and energy consumption, preventing pollution, promoting recycling and conserving resources.

### Compliance to EU regulations: RoHS, WEEE & REACH Directives

Any supplier that might be concerned by the following EU regulation and directive must take action to ensure its compliance:

- Directive 2002/95/EC on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS)
- Directive 2012/19/EU on Waste Electrical and Electronic Equipment Directive (WEEE)
- Regulation (EC) n° 1907/2006 for the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).

### Quality

Suppliers will meet generally recognized or contractually agreed quality requirements in order to provide goods and services that consistently meet Gunnebo Group's expectations.

Suppliers shall have a Quality system in place that enable them to control their incoming goods as well as their production process to ensure high quality delivery. They shall in particular be able to share recordings of their control upon Gunnebo's request, in case of necessary verification.

Suppliers shall have a system in place to manage quality claims in a swift and transparent manner so that issues can be addressed and solved quickly; thus ensuring that Gunnebo can maintain its customer satisfaction level.

### Management System

We expect our suppliers to establish appropriate organization structure and procedures for the effective management of all the requirements mentioned in Gunnebo Group Supplier's Code of Conduct.

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## 5 Implementation

Gunnebo Group expects that its suppliers will read this Code of Conduct, understand it and take appropriate steps to ensure that those principles are followed.

However, we may ask you to verify your compliance with these standards. This may include self-assessment, specific certifications, statements of compliance or on-site audits. If necessary, we may request an improvement plan to correct any issue that might be detected.

If a supplier has a serious concern that a requirement is not consistent within this Code, we encourage the supplier to report the matter to the Gunnebo Group.