Gunnebo Supplier Code of Conduct

Name of Document:	Gunnebo Supplier Code of Conduct
Applicability:	Worldwide – Gunnebo Group
Issued by:	General Counsel, Group Legal Department
Doc-ID:	GSE-01-001
Revision date (dd/mm/yy):	31/03/2026
Review date (dd/mm/yy):	30/06/2027
Creation date (dd/mm/yy):	01/04/2024
Type of document:	Group Policy
Approved by:	The Board-Gunnebo Holding AB

Table of Contents

1 Introduction **3**

2 Implementation and compliance with Supplier Code **3**

3 Legal compliance **3**

4 Human Rights **4**

5 Labour Standards **4**

6 Business ethics **5**

7 Quality, Health, Safety and Environmental Management **6**

8 Reporting concerns **7**

9 Monitoring and enforcement **7**

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 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 our Suppliers 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 expect our Suppliers to duplicate these principles further down the supply chain.

Gunnebo adheres to UN International Bill of Human Rights, International Labour Organisations (ILO) Declarations, OECD Guidelines for multinational enterprises and United Nations Guiding Principles on Business and Human Rights and we expect our business partners to do the same.

The Supplier Code of Conduct ("**Supplier Code**") applies to all Suppliers that deliver goods and/or services to Gunnebo, including any parent, subsidiary, or affiliate entities as well as their respective employees and agents (hereinafter individually and collectively referred to as "**Supplier**").

For the purpose of this Supplier Code of Conduct, agents, intermediaries, contractors, subcontractors, and consultants are also referred to as Suppliers.

2 Implementation and compliance with Supplier Code

Suppliers are expected to adhere to this Supplier Code. Gunnebo monitors compliance as described below in Section **Error! Reference source not found.** (*Monitoring and Enforcement*). Suppliers must ensure that relevant employees a nd other workforce are aware about the content of this Supplier Code and are recommended and encouraged to implement equivalent requirements on their own Suppliers.

The Supplier Code contains "Requirements" that Suppliers are expected to comply with and "Recommendations" that Suppliers are encouraged to comply with or implement. Additional Supplier specific requirements related to the areas in this Supplier Code may be defined in commercial agreements with specific Suppliers.

3 Legal compliance

Suppliers must stay up to date, and comply with, national and regional legislation as well as relevant and applicable international regulations and conventions related to all the areas in the Supplier Code.

Where the requirements in the Supplier Code are stricter than local laws, the requirements of the Supplier Code must be applied. In the event of actual or potential contradictions between the Supplier Code and applicable laws and regulations, Suppliers must notify Gunnebo.

4 Human Rights

Requirements

- Support and respect the protection of internationally proclaimed human rights.
- Be aware of and address any actual or potential negative human rights impacts that they cause or contribute to, or that is directly linked to their operations, products, or services.
- No allowance or tolerance for any form of modern slavery, including forced labour, in own operations or through value chain.
- Prevent all forms of child labour and respect children's right to personal development and education. The minimum working age is 15 years or the legally prescribed minimum work age, if higher.

5 Labour Standards

Requirements

- Ensure that all employees and individuals working under the control of Supplier are offered a safe and healthy workplace.
- Commit to zero fatalities at the workplace as well as high-consequence work-related injuries or ill health amongst employees.
- Ensure that a regular working week complies with relevant international labour standards.
- Pay wages and benefits at a minimum according to applicable laws, industry standards and relevant collective agreements, whichever is higher. Wages must be enough for employees to meet basic needs and to provide for some discretionary income (so called "living wage").
- No tolerance for discrimination at the workplace against anyone (employee or business relation representative) based on age, race, gender, religion, ethnicity, sexual orientation or disability or other relevant characteristics.
- Respect employees' freedom of association and employees' rights to collectively bargain with Supplier.
- Treat employees equally, according to their abilities and qualifications.

Recommendations

- Take active measures for employee wellbeing.
- Provide health insurance and extended income security and social benefits, even in jurisdictions where Suppliers are not required to do so.
- Where needed, seek to facilitate other forms of worker representation than collective bargaining.
- Promote diversity by striving to reflect the societies where Suppliers operate and promote various aspects of diversity including gender, age, ethnicity, skills, experiences, culture, and personality or other relevant characteristics.
- Contribute to the positive social and economic development of the communities where Suppliers operates and minimise any negative social impacts of its operations on those communities.

6 Business ethics

Requirements

- Prohibit all forms of corruption and bribery including extortion and facilitation payments. Supplier will not offer or accept bribes, gifts, entertainment, compensation, personal favours, or other unlawful incentive to/from their business partners.
- Ensure that employees of Supplier avoid all conflicts of interest that may impact (or appear to impact) Gunnebo. Our Suppliers are expected to disclose to us any apparent or actual conflict of interest regarding their relationship with Gunnebo.
- Business decisions relating to Gunnebo must remain independent from any consideration that does not involve the business at hand and cannot be influenced by private interests.
- Implement measures to prevent the risk of becoming involved in unethical, illegal, or criminal activities such as money-laundering or terrorist financing or engagement with business partners that are the target of economic sanctions or export control laws.
- Comply with relevant export controls and sanctions laws and regulations, including United Nations sanctions and applicable sanctions under the laws of the European Union, the United States (including but not limited to the U.S. Department of the Treasury’s Office of Foreign Assets Control), and the United Kingdom.
- Comply with the principles of free enterprise and fair competition, including ensuring that no employees engage in discussions or agreements with competitors regarding price fixing, market sharing, bid rigging, or similar.
- Protect Gunnebo’s personal data from any improper disclosure, theft or misuse at all times and respect the right to information and privacy of end users.

- 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.
- Suppliers must not share or disclose Gunnebo's intellectual property or confidential information with any third party without any written consent from Gunnebo.
- Exchanges of confidential information between Gunnebo and its Suppliers will be pursuant to a written confidentiality agreement and will be limited to the purpose of fulfilling contractual obligations.
- We require our Suppliers to ensure that products supplied to Gunnebo do not contain any metal derived from minerals or their derivates originated from conflict regions that directly or indirectly finance or benefit armed group.
- Supplier's employees shall be encouraged to report concerns or potentially unlawful activities. Such report should be treated confidentially, investigated, and satisfactorily resolved.
- Pay the right amount of tax, in the right place, at the right time.

Recommendations

- Implement a code of conduct or code of ethics.
- Provide employee training on areas covered by this Supplier Code.

7 Quality, Health, Safety and Environmental Management

Requirements

- Provide employees a safe and healthy environment in compliance with all applicable laws and regulations. Appropriate controls, procedures, information, training and equipment shall be provided to mitigate health and safety risks for all personnel involved in the suppliers operations.
- Compliance with 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.
- Adhere to (i) Directive 2002/95/EC on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS); and (ii) Directive 2012/19/EU on Waste Electrical and Electronic Equipment Directive (WEEE); and (iii) Regulation (EC) n0 1907/2006 for the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).
- Identify actual and potential main material environmental and climate impacts from their operations, including products and services, and take appropriate and reasonable measures to prevent or minimise such negative impact.

- Meet generally recognized or contractually agreed quality requirements in order to provide goods and services that consistently meet Gunnebo´s expectations.

Recommendations

- Support the Paris Agreement commitment to mitigate climate change by keeping the global temperature rise below 1.5 degrees and implement measures supported by science-based targets to reduce greenhouse gas emissions in operations and reach net zero by 2050. We encourage our partners to set carbon reduction targets according to the Science Based Targets Initiative and have approved targets for scope 1,2 and 3.
- Wherever possible promote and contribute to climate change adaptation; the sustainable use and protection of water and marine resources; the transition to a circular economy; pollution prevention and control; and the protection and restoration of biodiversity and ecosystems.
- To work continuously and systematically towards better environmental performance by setting targets, measuring, and reporting on progress on all areas of materiality.
- We encourage our partners to implement integrated management systems in line with ISO 9001, ISO 14001 and 45001 and preferable also achieve external certifications of these systems.

8 Reporting concerns

If you have any concerns, please contact Group Legal Counsel at Gunnebo (grouplegal@gunnebo.com).

We encourage all our Suppliers to use our Ethics Helpline to report any wrongdoing. Suppliers are expected to report in good faith.

Gunnebo shall handle all reports made to us promptly, at the end of every investigation we will communicate our findings. Gunnebo does not tolerate any forms of retaliation against anyone who in good faith submits a report of an alleged violation and we require Supplier to ensure that its employees have the right to raise concerns about potential breaches of this Supplier Code without the fear of reprisals through the Supplier ordinary whistleblowing/reporting channel.

9 Monitoring and enforcement

If a Supplier becomes aware of any violations of this Supplier Code, it is expected to inform Gunnebo without undue delay. Following a violation, Supplier will be given the opportunity to remedy any such violations. If Supplier does not inform Gunnebo about the violation or does not remedy an acknowledged violation, Gunnebo has the right to take legal actions including the right to terminate the commercial agreement between Gunnebo and Supplier.

Gunnebo must have the right to and may verify Supplier’s compliance with the requirements in this Supplier Code by means of dialogue, self-assessment questionnaire or on-site audits. Gunnebo must also have the right to conduct

interviews with Supplier's employees and gain access to relevant, accurate and complete documentation and records related to this Supplier Code. Audits may be carried out by Gunnebo or an independent third party appointed by Gunnebo. Gunnebo acknowledges that its audit rights including access to documentation and records may be restricted due to Supplier's legal or contractual obligations.