

Code of conduct Alarmtech



ALARMTECH

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The purpose of the Code is to indicate the framework of behavior in the daily activities of ALARMTECH. It defines how we should carry out entrusted tasks based on the company's current culture.

The Code is not able to predict and resolve any situation that can happen in the company, but it sets the framework for making responsible decisions.

WHO IS OUR CODE OF CONDUCT FOR?

This Code applies to every employee, director and officer of ALARMTECH. Sales Representatives who are agents of, or working on behalf of, or in the name of a ALARMTECH company (through outsourcing of services, processes or any business activity), are required to act consistently with the Code when acting on our behalf.

OUR CORE VALUES AND BUSINESS PRINCIPLES At ALARMTECH

We share a set of core values –integrity, honesty and respect for people. By making a commitment to these in our working lives, each of us plays our part in protecting and enhancing ALARMTECH's reputation.

YOUR RESPONSIBILITIES

- Understand the risks in your role and how to manage them.
- Seek advice when things are not clear.
- Make sure that any third party contractors, agents or consultants you work with are aware that we are bound by our Code and that they should act accordingly
- Speak up. It is your duty to report any suspected violations of the Code.

SEEK ADVICE AND SPEAK UP

If you would like advice on any matter relating to the Code or wish to report a concern, speak to your line manager or Human Resources Expert of ALARMTECH. You can also report abuse by email to info@alarmtech.pl.

KEY RULES:

Mutual respect
Honest business
Information security
Separation of personal and business interests.

1. MUTUAL RESPECT

1.1. MANAGER'S RESPONSIBILITIES

We expect managers to show leadership in following our Code and maintaining a culture of commitment to ethics and compliance, where it is normal to do the right thing and people feel confident about speaking up.

AS A MANAGER YOU MUST:

- Understand and follow the Code.
- Understand the main Code violation risks that apply in your business or function, and the procedures to mitigate them.
- Ensure your staff understand the procedures they should follow to avoid violating the Code.
- Be alert to any violations of the Code, and encourage your team members to speak up if they know or suspect a violation.
- If you are told of a possible violation of the Code, you have a duty to report it. You may refer it to the ALARMTECH Top Management.
- Decide and implement appropriate consequence management in response to a violation of the Code.

1.2. OUR BEHAVIOURS, PEOPLE AND CULTURE

We want ALARMTECH to be a great place to work, and we want to protect our reputation among customers, suppliers, governments and communities as a company that always strives to do the right thing. To do that, we need everyone doing business on behalf of ALARMTECH to live up to our core values of honesty, integrity and respect for people.

1.3. HEALTH, SAFETY AND SOCIAL PERFORMANCE

We are committed to the goal of doing no harm to people. We aim to earn the confidence of our customers and contribute to the communities in which we operate as good neighbours, creating lasting social benefits.

ALARMTECH is required to have a systematic approach to the management of Health, Safety, designed to ensure compliance with the law and to achieve continuous performance improvement, while promoting a culture in which all ALARMTECH staff and contractors share this commitment.

YOUR RESPONSIBILITIES

- You must comply with the law, standards and procedures. You must intervene in unsafe or non-compliant situations.
- You must ensure that your work complies with the Integrated Management System Policy.
- You must report and act on a incident, potential incident or near-miss as soon as you become aware of it.

1.4. CONFORMITY WITH THE ENVIRONMENT

ALARMTECH we make every effort to ensure that our business activity complies with the applicable legislation in the field of environmental protection as well as the applicable internal requirements.

YOUR RESPONSIBILITIES

- Follow the environmental regulations and company requirements that apply to your work.
- Take all necessary precautions when working with dangerous materials, dangerous parts or waste and during transport, including loading, unloading and storage. If you do not know

these requirements, ask your manager for guidance.

- When using chemicals and other materials and disposing of them, follow the appropriate instructions; Report any spill or contamination or environmental concerns.

1.5. HUMAN RIGHTS

We comply with applicable laws and regulations, including the United Nations Universal Declaration of Human Rights and the core conventions of the International Labour Organisation. We also regularly engage with our external stakeholders and always strive to contribute, both directly and indirectly, to the general wellbeing of the communities in which we operate.

Conducting our activities in a way that respects human rights is a business imperative for ALARMTECH.

- Company-wide security requirements help keep staff, contractors and facilities safe in a way that respects human rights and the security of local communities.
- Our policies and standards help us establish fair labour practices and a positive work environment.
- We seek to work with contractors and suppliers who contribute to sustainable development and are economically, environmentally and socially responsible.

YOUR RESPONSIBILITIES

- You must ensure that your work complies with ALARMTECH commitments to human rights in Social Performance, Security, Human Resources and Contracting and Procurement.
- If you know of or suspect any potential human rights violations relating to our business, it is your duty to speak up.

1.6. MOBBING

ALARMTECH will not tolerate mobbing. We will not tolerate any action, conduct or behaviour which is humiliating, intimidating or hostile. Treat others with respect and avoid situations that may be perceived as inappropriate. Feedback, criticism and challenge must always be delivered in an appropriate and respectful manner. In particular, be aware of cultural sensitivities – what is acceptable in one culture may not be in another. It is important to be aware of and understand these differences.

YOUR RESPONSIBILITIES

- You must treat others with respect at all times.
- You must not physically or verbally intimidate or humiliate others.
- Challenge someone if you find their behaviour hostile, intimidating, humiliating or disrespectful.

1.7. EQUAL OPPORTUNITY

At ALARMTECH, we offer equal opportunities to everyone.

YOUR RESPONSIBILITIES

- When making employment decisions, including hiring, evaluation, promotion, training, development, discipline, compensation and termination, you must base them solely on objective factors, including merit, qualifications, performance and business considerations.
- You should understand the value of diversity and must not discriminate in any way based on race, colour, religion, age, gender, sexual orientation, gender identity, marital status, disability, ethnic origin or nationality

2. HONEST BUSINESS

2.1. CONFORMITY OF PRODUCTS

ALARMTECH products are designed, manufactured, marketed and sold in accordance with applicable legal requirements and our internal quality and safety standards. Compliance is essential in building trust in our products and leading to the success of our company and our customers.

YOUR RESPONSIBILITIES

- Be in compliance with all regulations, legal requirements and international standards, including emissions, safety, hazardous materials or parts and noise.
- If you are designing new products or modifying existing ones, make sure that they comply with the applicable legal standards when they are placed on the market and throughout the period in which they are required.

2.2. TRADE COMPLIANCE

We comply with all applicable national and international trade compliance regulations. Trade compliance includes regulations governing the import, export and domestic trading of goods, technology, software and services as well as international sanctions and restrictive trade practices.

Failure to comply with the applicable laws could lead to fines, delays, seizure of goods or loss of ALARMTECH's export or import privileges, as well as damage to ALARMTECH's reputation or imprisonment for individuals. It is crucial that you are aware of the requirements and how they apply to your role.

YOUR RESPONSIBILITIES

- You must obtain, retain and communicate correct customs and export control classification on all goods and software moved internationally. For physical movements of goods and software, valuation and origin information is also required.
- You must follow company guidance when travelling with company-owned equipment and hardware, including laptops, smartphones and other communication equipment.
- You must follow company procedures when issuing or executing an End User Certificate.
- You must ensure third parties you deal with have been properly screened against applicable sanctions lists.
- You must stop and seek assistance from a Trade Control Manager when your dealings with a third party identify suspicious facts or 'red flags'.
- You must not deal in a sanctioned country or with a sanctioned party unless specifically authorised in accordance with company procedures. If you are authorised to deal in a sanctioned country or with a restricted or sanctioned party, you must strictly adhere to company guidance.
- You must obtain advice and assistance from your Trade Control Manager when manufacturing, selling, exporting or importing military, defence or drug-related items.
- You must classify, label and handle Controlled Technology in accordance with company procedures.
- You must stop and seek advice from a Trade Control Legal Advisor when confronted with a restrictive trade request.

2.3. ANTI-MONEY LAUNDERING

Money laundering occurs when the proceeds of crime are hidden in legitimate business dealings, or when legitimate funds are used to support criminal activities, including terrorism. All companies are

at risk of being exploited in this way – and we must be on our guard to help protect our reputation and ensure we comply with the law.

YOUR RESPONSIBILITIES

- You must not knowingly deal with criminals, suspected criminals or the proceeds of crime.
- You must follow any due diligence requirement specified by ALARMTECH so that we know who we are doing business with.
- You must ensure that your business transactions on behalf of ALARMTECH do not involve acquiring, using or holding monetary proceeds or property acquired with the proceeds of crime.
- You must not hide the origin or nature of criminal property.
- You must not facilitate the acquiring, ownership or control of criminal property.
- If you have knowledge or suspicion that a counterparty is involved in money laundering in connection with its transaction with ALARMTECH, you must promptly report it to the top management.

2.4. ANTI-BRIBERY AND CORRUPTION

At ALARMTECH, we build relationships based on trust. Everyone involved in ALARMTECH’s business must comply with the anti-bribery and corruption laws of the countries where we operate, as well as those that apply across borders.

YOUR RESPONSIBILITIES

- You must not offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain a business advantage. You must not allow anybody else to do so on your behalf.
- You must not make facilitation payments. If a facilitation payment has been requested or

made, you must immediately report it to your line manager.

- You must report corrupt behaviour. Turning a blind eye to suspicions of bribery and corruption can result in liability for ALARMTECH and for individuals.

2.5. ANTITRUST

Antitrust laws protect free enterprise and fair competition. We expect ALARMTECH staff to play their part in combating illegal practices. These include pricefixing, market sharing, output limitation or bid-rigging, and anticompetitive or monopoly practices.

Be vigilant in not entering into any kind of inappropriate conversation or agreement with our competitors.

YOUR RESPONSIBILITIES

- You must not agree with competitors, even informally, to fix price or any element of price, such as discounts, surcharges or credit terms.
- You must not agree with competitors to reduce or stabilise production, capacity or output.
- You must not agree with competitors to divide up particular customers, accounts or markets.
- You must not rig bids or tenders.
- You must not agree with others to boycott any customer or supplier except in connection with internationally imposed government sanctions.
- You must not attempt to set a minimum or any resale price for an independent dealer, distributor or reseller.
- You must not share or receive competitively sensitive information without a lawful reason.
- You must not discuss with competitors any matter on which competitors are not legally permitted to agree.
- You must follow the principle that all decisions on ALARMTECH’s pricing, production, customers and markets must be made by ALARMTECH alone.

- You must leave industry meetings or other events if competitively sensitive issues arise. Ensure your departure is noted and immediately report the matter to ALARMTECH Legal or the ALARMTECH Ethics & Compliance Office
- You must speak up if you know of any potentially anti-competitive practices or if you are uncertain whether or not practices are legal.

3. INFORMATION SECURITY

3.1. MANAGING RISK IN INFORMATION AND COMMUNICATION

Our work for ALARMTECH depends on the use and exchange of information. In our everyday work, we all handle information and communicate in many different ways, and we need to consider the risks associated with these activities. These risks include the risk that personal data or ALARMTECH's Intellectual Property could fall into the wrong hands. Careless communication or an unauthorised disclosure could also damage our reputation or result in legal action.

3.2. DATA PRIVACY

At ALARMTECH, we respect the privacy rights of our staff, customers, suppliers and business partners. We are committed to managing personal data in a professional, lawful and ethical way. We may only process personal data for legitimate purposes and the data must be accurate and relevant for the purpose for which it was collected, as well as properly protected from inappropriate access or misuse. When it is to be transferred to third parties, it must be appropriately safeguarded. If we do not comply with these requirements, we risk causing harm to individuals, being ordered to cease the processing and could face fines or

litigation. We are also putting ALARMTECH's reputation at risk.

YOUR RESPONSIBILITIES

- You must identify the privacy risks before collecting, using, retaining or disclosing personal data, such as in a new IT system, project or marketing initiative.
- You must only process personal data for specific, defined, legitimate purposes.
- When you process or share individuals' personal data, you must always inform them.

In some cases, you will need to get their prior consent.

If you are not sure whether you need consent or how to protect personal data when sharing with a third party, always seek advice from ALARMTECH Legal Office.

3.3. INTELLECTUAL PROPERTY

At ALARMTECH, we have great brands, ideas and technology, which has given us a great reputation that we all need to protect. These valuable brands, ideas and technology also need protecting, as do trademarks, patents, know-how, trade secrets and other IP rights, and put to optimal use for ALARMTECH. It is equally important that we respect, and avoid infringing, the IP rights of others. Not doing so risks damage to our business and reputation, and may impact our ability or licence to operate.

YOUR RESPONSIBILITIES

- You must use ALARMTECH's brands and trademarks appropriately.
- You must classify and store ALARMTECH business and technical information appropriately, and with appropriate access controls.
- You must not disclose ALARMTECH's confidential information outside ALARMTECH without permission or an appropriate written agreement.

- You must not accept confidential information from a third party unless you have permission to do so and you have agreed to receive it under a prior written agreement.
- You must not misuse confidential information of a third party.
- If you notice that a third party is infringing or misusing ALARMTECH IP rights, for example by passing on documents containing confidential information, it is your duty to speak up.

3.4. INFORMATION AND RECORDS MANAGEMENT

Like all organisations, we depend on the use and exchange of information for our business decisions and day-to-day activities. We need to ensure we create, use responsibly and protect this information, especially when it comes to data such as personal details, commercially sensitive information and intellectual property – both our own and that of others. We need to take special care to protect confidential information when we are away from the ALARMTECH environment. We also have a duty to ensure we retain proper Records of our business activities to preserve corporate memory and meet legal and regulatory requirements.

YOUR RESPONSIBILITIES

- You must assess the risks associated with any information you handle so you can properly manage the risks and protect the information.
- When you create or receive information, you must assign it a confidentiality classification, declare it as a Record if required, store it in an approved Group repository, only share it with those who are entitled and permitted to receive it and follow the more detailed Information Management requirements and guidance materials.
- If you are working with third parties, you must ensure you are authorised to share information before doing so.

3.5. MANAGING RISK IN THIRD PARTY AND INTERNATIONAL INTERACTIONS

Every time ALARMTECH deals with a customer, business partner, Government Official, competitor or any other stakeholder, we need to understand the risks as well as the opportunities. We also need to ensure that ALARMTECH's cross-border interactions comply with all relevant trade legislation.

If we do not comply with the law, it could lead to fines for ALARMTECH or serious harm to our business. Individuals could also face fines or imprisonment. This section of our Code of Conduct is designed to help you keep your business interactions legal, ethical and professional, ensuring that you protect yourself from any suspicion of wrongdoing and safeguard ALARMTECH's reputation.

4. SEPARATION OF PERSONAL AND BUSINESS INTERESTS.

4.1. POLITICAL ACTIVITY AND PAYMENTS

We all have our own interests outside work and you have the right to engage in lawful political activity in our own time but we must keep our personal political activities separate from their role at ALARMTECH.

YOUR RESPONSIBILITIES

- You must not use ALARMTECH funds or resources, either directly or indirectly, to help fund political campaigns, political parties, political candidates or anyone associated with them.
- You must not use ALARMTECH funds to make political payments under the guise of charitable donations
- You must always make it clear that the political views you express or actions you take are your own, and not those of ALARMTECH.

4.2. CONFLICT OF INTERESTS

At ALARMTECH, we have to work in the best interest of the company and avoid situations in which can interfere our private interests with employee duties as well disclose all such situations.

YOUR RESPONSIBILITIES

- Do not disclose internal information without authorization.
- Follow our procedures concerning internal information and notification of unintentional disclosure.



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