GROUP FAIR COMPETITION POLICY

September 2023

Executive Summary

The purpose of this Policy is to prevent breaches of competition law. Fair competition cuts across all areas of our business – when we negotiate, when we sell, when we purchase, when we gather competitive intelligence, when we hire and when we have contact with competitors. Violation of competition laws never pays off.

This Policy covers how we must deal with competitors, suppliers and other business partners and it highlights in particular what we should do if we have, or might get, a dominant position in a country. It also contains practical guidance on the creation of internal documents and what to do if there is an investigation.

Issuing Function: Group Legal Function

Owner: Chief Legal Officer

Version: 2.0

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Introduction

We are committed to winning by competing vigorously and fairly, respecting competition laws that exist to preserve free and fair competition. This Policy is intended to help strengthen understanding about the key principles to follow in our operations day-to-day.

Competition laws prohibit companies from engaging in practices that limit free and fair competition, such as collusion, exchanging sensitive business information, forcing each other out of business based on abusive market practices, jointly boycotting suppliers or other business partners.

Violation of competition laws never makes sense. It is not compatible with Verisure's DNA on winning with trust and responsibility. Violations will damage the trust of our employees, customers, investors and other key stakeholders that we need to win and will cause severe reputational damage. Additionally, there is a risk of high fines, personal criminal prosecution of those involved and the payment of damages to those affected. Competition law investigations always cause business disruption and are highly costly from a resource perspective.

Violations therefore never pay off and Verisure has a zero tolerance against non-compliance in the organization. We all have the responsibility to follow this Policy and any breach of it will lead to disciplinary actions. When in doubt, always seek guidance from a colleague in the Legal function.

Capitalized words can be found in the definitions section of this document.

Key Principles

Always take strategic business decisions independently	Never align or coordinate with actual or potential competitors in relation to strategic business decisions, including: • **Pricing** to customers, suppliers or other partners; • **Strategic market behavior**, including marketing or sales campaigns, geographic or service segment entry and product or service launches.
Never share, accept and/or ask to receive Competitively Sensitive Information	Never share with or ask to receive Competitively Sensitive Information and notably, the following type of information: • **Prices, price structure elements** (including costs and margins) **or terms of business** (such as purchasing conditions); • **Current business focus**, e.g., in relation to specific customer, service or geographic segments; • **Planned market initiatives**, such as marketing or sales campaigns, geographic or service segment entry, product or service launches, investments or transactions; • **Production, supply** or **sales** volumes or conditions; • **Sourcing strategy, business costs** or **capacities;** • **Actions against suppliers**, such as boycotts; • **Employment terms or other recruitment practices**; and • **Participation in a commercial or public tender process**.

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Follow internal guidelines and processes for all gathering of competitive intelligence, including through mystery shopper	We can legitimately gather public competitive intelligence to inform our independent business decisions. However, in doing so we must follow internal guidelines and processes, relating to the collection, compilation, storage, sharing internally, marking and deleting.
Insist on agenda and minutes for any meeting with competitors and always first consult the Legal function	There are at times legitimate reasons for competitors to be in contact, e.g., as part of trade association meetings to discuss regulatory developments, to raise concerns about misleading marketing practices, or to explore potential for a merger or acquisition. Make sure to document in writing any touch points, such as meetings or calls, with competitors, preferably by an agenda and minutes, but at a minimum by minutes, including whenever possible the public source of the discussed information. Both agenda and minutes can be in brief email form and does not require a formal, separate document. Do not engage in contacts with competitors without first consulting with the Legal function and always follow their guidance.
Take care when engaging with suppliers, customers, licensees / licensors that are also competitors	Some of our business partners are also competitors (e.g., Securitas AB). Take special care when engaging in discussion with these partners to always keep focused on the business partner relationship and to not let discussions slip into areas of competition.
Seek advice before agreeing on exclusivity and non-compete obligations in agreements with suppliers, licensors or other partners	Exclusivity or non-compete in agreements with suppliers, licensors and other partners may be permissible in cases where these third parties are not actual or potential competitors to Verisure. Always seek advice from the Legal function before agreeing to such restrictions.
When in a position of market strength, do not engage in behaviors that risk being perceived as abusive	In countries where we have a strong market position, do not engage in behaviors that could be seen as discriminating between customers, abusing our market strength vis-à-vis customers or suppliers, or forcing competitors out of the market by unfair market practices.
Do not encourage nor allow colleagues joining from competitors to share non-public Competitively Sensitive Information.	Do not encourage nor allow colleagues joining from competitors to share non-public Competitively Sensitive Information about their previous employer and ask them to refrain in case they still do. Separate Group Guidance exists for Recruitment and other HR activities.
Seek advice before engaging in discussions about mergers or acquisitions	Always inform Group Finance and Legal functions before engaging in any merger or acquisition discussion. Separate Group guidance exists on how to manage such discussions.

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Be cautious when creating internal or external documents	Internal and external documents (business presentations, emails, briefs, etc.) can be seized as part of a competition law investigation or be requested in the context of an agency's review of a merger or acquisition.
When in doubt, always seek advice	We take strict compliance with competition laws and always Doing the Right Things very seriously. Additionally, violations of competition laws can cause severe financial and reputational damage. Whenever in doubt, always seek guidance from a colleague in our Legal function.

Who Must Follow This Policy?

We must all comply with this Policy. Any breach of this Policy will lead to disciplinary actions.

How Do I Comply?

In all our dealings with competitors, suppliers, customers and other third-parties, we have to act in a way that does not restrict fair and free competition.

This section gives you guidance on how to comply and covers the following seven areas:

- Dealing with competitors;
- Dealing with suppliers, franchisees, licensees/licensors, alliance partners and other business partners, including those that compete with Verisure;
- Gathering competitive intelligence;
- Dealing with a strong market position or dominance;
- Dealing with mergers and acquisitions;
- Interacting with candidates and employees; and
- Creating internal documents.

Dealing with Competitors

A key principle in competition law is that Verisure must determine its commercial strategy independently of its competitors, without any collusion or coordination.

What is a competitor? The term should be interpreted widely. Our competitors include all companies that currently offer the same or similar products or services as Verisure or may do so in the future. Examples include traditional suppliers of monitored alarm systems, such as Sector Alarm, Prosegur, Securitas AB, G4S, EPS, ADT, Ajax, but also camera suppliers such as Amazon (Ring) and Anker (Eufy). We must follow the below guidelines when dealing with competitors:

1. **Do not reach any sort of agreement or understanding with any competitor about how either company currently competes or intends to compete**

An agreement does not have to be formal, written or explicit. Any understanding or "meeting of the minds" between competitors about their future commercial strategy or market behavior – even if not specifically expressed – can infringe competition law. Such understanding can be inferred from contacts

between competitors, whether direct or indirect, one-way or reciprocal, that involve a disclosure of Competitively Sensitive Information.

The following topics are particularly sensitive and should never be discussed (or agreed on) with competitors:

- Agreeing on prices (maximum, minimum, or any matters affecting price), costs, capacities, production or quantities;
- Agreeing on terms of business (payments, guarantees, cancellations, *etc.*);
- Dividing or allocating markets, customers, or suppliers; and
- Boycotting customers, competitors, or suppliers.

Examples: Agreeing with a competitor that Verisure will not knock-on doors in a specific region, that Verisure will not go after commercial customers in a specific country, not to compete for each other's customers or informing a competitor that Verisure intends to increase prices in a specific country.

2. Do not share Competitively Sensitive Information about Verisure's commercial strategy/market behavior – and do not ask for, use and/or accept such information from our competitors

The exchange or sharing of Competitively Sensitive Information between competitors is particularly sensitive and will likely be considered a competition law infringement. Therefore, never ask for, use and/or accept such information from a competitor.

Even disclosing Verisure's future commercial strategy in fairly general terms, or disclosing it publicly, may constitute a competition law infringement. For the same reasons, do not ask to receive Competitively Sensitive Information, even in general terms or based on what has been disclosed publicly, from a competitor.

Always seek advice from the Legal function when in doubt.

What if I receive Competitively Sensitive Information? Receiving Competitively Sensitive Information, even if you did not request it, presents a risk. If you receive such information, you should contact the Legal function for advice on how to respond. It is critical that you do not disseminate the information as market intelligence, since it would create an assumption that Verisure has acted on the information. Likewise, do not provide Verisure or colleagues at Verisure with Competitively Sensitive Information relating to a competitor, even if you gained access to this information legitimately such as through a previous employment. If you are given the information verbally, you should immediately interrupt the person sharing the information and make clear that you are not interested in receiving the information in question. Contact the Legal function as soon as you can after the conversation to ask for advice.

3. Observe best practice at any legitimate meetings (including trade association meetings) at which competitors will be present

Participating in formal and informal meetings with competitors to deal with industry-wide issues can be perfectly legitimate. These include formal trade association or industry meetings, as well as informal social events and situations such as receptions, lunches, and dinners where competitors are present. However, even these meetings present competition law risk and it is important to stay vigilant against any inappropriate discussion.

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The following best practices for legitimate meetings with competitors must be observed:

Trade association meetings. Be mindful of the competition law risks presented by trade association meetings and other industry meetings. Participants should not agree or reach an understanding about how they compete going forward or disclose Competitively Sensitive Information (see above).

Legitimate topics include legislative initiatives, health and safety standards, industry advocacy or public relations activities (e.g., public perception, image, etc.), and general industry-wide technology issues (e.g., suitability and characteristics).

Before the meeting:

- Consult the Legal function before accepting an invitation to any meeting with competitors;
- Always ensure that a written agenda for the meeting is prepared and circulated in advance; and
- Consult the Legal function in advance if you are concerned about a specific agenda item and about how to keep the discussion of a given agenda item within the limits of competition law.

During the meeting:

- In a formal trade association or other industry meeting, it is good practice for the meeting chair or moderator to give a reminder about competition law compliance at the start, e.g., by referring to the association's own compliance policy. If this is not done, you should prompt the meeting chair to do it or find a way to remind the association to do so going forward; and
- If you are concerned that a discussion is heading in a problematic direction, or that someone has shared Competitively Sensitive Information, walking away, staying quiet, or ignoring the discussion is not sufficient. You must actively distance yourself from the discussion as follows:

    - Stop the discussion and give a reminder about competition law compliance;
    - Ensure that your concerns are recorded in the minutes;
    - If the discussion continues, you must leave the meeting immediately;
    - Ensure that you departure is recorded in the minutes; and
    - Inform the Legal function as soon as possible.

- Keep a brief note of the topics discussed during the meeting and the public source of the information discussed (if any).

After the meeting:

- Ensure that you receive minutes of the meeting and review them carefully. If you notice any inaccuracies in relation to yourself or Verisure, raise a written objection immediately and ensure that the objection is incorporated, or your objection recorded;
- If you realize after the meeting that Competitively Sensitive Information may have been shared, it is important that you consult the Legal function as soon as possible; and
- If you did not attend a meeting to which you were invited, make it is clear from the record that you did not attend (e.g., a note in the minutes or an email from yourself to the organizer). This is important in case it becomes necessary to prove that you were not present.

Informal meetings and social events**.** Keep in mind that there is no such thing as an "off-the-record" conversation under competition law. If an inappropriate discussion takes place during an informal gathering of competitors, your presence (even if you don't say or do anything) presents a risk. It is

important that you stop any inappropriate discussion immediately. If the discussion continues, you need to leave the gathering and consult the Legal function as soon as possible.

Example: *You are having dinner with a friend who works at Sector Alarm, who casually mentions that they are experiencing higher costs and will be raising prices soon. Passively receiving this information creates an assumption that Verisure has adapted its own strategy accordingly. It is therefore very important that you stop the discussion and inform the Legal function immediately afterwards.*

Dealing with Suppliers, Franchisees, Licensees/Licensors, Alliance Partners and Other Business Partners, including those that Compete with Verisure

Verisure deals with a number of partners as part of its business operations, including suppliers, franchisees, alliance partners and licensees/licensors. These relations will generally not trigger competition law issues. Nevertheless, specific elements of our collaboration may require a competition law analysis. In this regard, always consult the Legal function before agreeing on any of the following in relation to a business partner:

- Exclusivity;
- Non-compete;
- "Right To Match" / "Most Favored Nation" (MFN); or
- Sharing of information involving another supplier or customer.

Some of our business partners are also competitors, e.g., Securitas AB. This means that we need to deal with them both as part of a business relation – e.g., supplier, customer or trademark licensor – (which is a "vertical" relationship) and a competitor (which is a "horizontal" relationship).

Where the interaction between Verisure and such business partners relates to the vertical relationship, it is legitimate to discuss matters and to exchange information necessary to enable those relationships to function effectively. Examples of what can be discussed include:

- Supply/Purchase Agreements: prices and discounts, product specifications and other contractual terms, such as invoicing, termination, renewal, etc., relating strictly to the supply/purchase relation;
- Licensing Agreements: license fees, license specifications, terms of use, territorial application and other contractual terms, such as sub-licensing, assignment, registrations, etc., relating strictly to the licensing relationship.

Where a supplier or licensor is also our competitor, there are strict rules regulating what can be discussed, shared, and exchanged with that business partner. Because of the competitor relationship, it is important that any interactions do not affect competition between the two companies. In particular, in respect of any market in which Verisure currently competes with that company (or may compete in the future), the two companies must not:

- Reach any agreement or understanding about how either company currently competes or intends to compete, including the customers that either company serves, the terms on which it supplies those customers, and/or the territories in which it competes;
- Exchange or share any Competitively Sensitive Information about any market in which they currently or may in the future compete;

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- Link their agreement to any vertical relationship to reaching an agreement or understanding between them concerning a market in which they compete or may be expected to compete**.** By way of example, neither company should seek to condition a supply agreement or a trademark license on an understanding or agreement that the other company refrain from competing with that company, or commit to compete less intensively, in a particular territory or for a particular customer (or group of customers); or
- Discuss the identity of each company's other customers, suppliers, or licensors/licensees or the prices or other terms in each company's agreements with those other third parties.

If you believe that – based on exceptional circumstances – it is necessary to share any of the above information in order to enable the negotiation or effective implementation of any vertical relationship, first consult the Legal function.

Always consult the Legal function before entering to a new agreement with a supplier, customer or licensee/licensor that is also a competitor of Verisure.

Gathering Competitive Intelligence

1. Permissible sources and type of information

Gathering competitive intelligence, *i.e.*, third-party and public information about products, markets, industry players, and other business parameters, is essential for our business. It is legitimate to collect such information, as long as it does not entail Competitively Sensitive Information about a competitor such as non-public business strategies, future marketing campaigns or product launches, pricing strategy, or R&D pipeline. Information containing such Competitively Sensitive Information must never be gathered or kept.

Competitive intelligence can be safely collected from genuinely public sources, such as websites, newspapers, annual reports, press releases, third party analyst reports, *etc*.

A competitor is never a legitimate source of competitive intelligence. This applies even to situations where you or a colleague obtained the information while working for the competitor in question – it will still not be a legitimate source of information.

We often receive information from our customers about offers (including price and other terms) from our competitors, for example when a customer is seeking better terms from us or wants to cancel his service. This is perfectly legitimate. It is however important that you do not seek to verify the information with the competitor.

Example: You learn from several of our customers that Prosegur has publicly announced a price increase of 5%. Other customers tell you that other competitors have also raised their prices by 5%. In this situation, you are allowed to consider the information (in light of Verisure's own revenue and profit expectations) and decide to announce a 5% increase as well.

2. Process for gathering competitive intelligence

In every country where competitive intelligence is gathered, a team responsible for the competitive intelligence gathering process must be established (here referred to as the "Fair Competition Committee"). The Fair Competition Committee should include senior team members from Marketing, Sales and Operations, and must always include a senior team member from Legal.

The Fair Competition Committee is responsible for setting out a process to follow for collecting competitive intelligence that includes in any event:

- How to gather competitive intelligence, which sets out permitted sources, permitted methods for gathering and how to channel competitive intelligence internally for compilation;
- How the competitive intelligence is compiled, kept updated and further shared internally; and
- How competitive intelligence is marked, mentioning the precise source and date (e.g., Nielsen private security report, August 2023).

The Fair Competition Committee is also responsible for ensuring that the relevant teams involved in the gathering of competitive intelligence (e.g., Marketing, Sales and Customer Care teams) are trained on the principles and process for identifying and reporting internally on competitive intelligence.

The Fair Competition Committee should meet regularly to assess the external situation, the working of the process and any follow up actions.

For more detailed guidance, see the separate “Fair Competition Guidelines for Gathering Competitive Intelligence” available [here].

3. Considerations specific to the use of mystery shoppers

A special form of gathering competitive intelligence is the use of mystery shoppers (i.e., individuals subscribing to competitors’ offer as customer to lawfully gather publicly available insights on the competitors’ offers), that can be used as a legitimate source for gathering competitive information, provided that the related guidance is followed at all times. In that regard, mystery shopper activities can only be performed as part of an internal process established according to our “Fair Competition Guidelines for Mystery Shoppers”. Of special note is that we must not, as part of a mystery shopper arrangement, collect any Competitively Sensitive Information but limit ourselves to standard information shared by the competitor with prospective customers and customers, and that all persons involved in mystery shopping must be trained on our guidelines and the related processes.

Dealing with a Strong Market Position or Dominance

Being in a dominant position on a given market is not in itself prohibited, but dominant companies have a special responsibility not to impair competition. Conduct that is normally acceptable can be “abusive” – and consequently illegal – when carried out by a dominant company.

It is therefore important to be aware of our position in each country. Possessing large market shares does not automatically place a company in a dominant position and, in any event, it will also depend on how the relevant market is defined. That said, when we have a strong position in a given country, it is important to closely partner with the Legal function for any commercial initiative that risks having a foreclosing effect on competitors or making it difficult for competitors to compete effectively, or which on non-objective grounds discriminates between different vendors or customer groups. In this regard, always partner with the Legal function before engaging in any initiative that could be interpreted as:

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- **Price discrimination** (*i.e.*, offering different terms to similar customers or other trading partners who are in an otherwise similar situation);
- **Predatory pricing** (*i.e.*, price cutting or selling at a loss);
- **Tying** (*i.e.*, making the purchase of one product/service conditional on a purchase of another product/service);
- **Bundling** (*i.e.*, offering two or more products/services together and charge less for the bundle than the components separately); or
- **Refusal to supply** (*i.e.*, refusing to supply a product/service to a customer).

Dealing with Mergers & Acquisitions

Transactions, *i.e.*, mergers, acquisitions or divestiture of a business or assets, may require review and prior approval by a competition authority. Always involve the Legal function when considering a transaction, even if it seems small.

Interacting with Candidates & Employees

Competition rules also apply to recruitment practices and information received from candidates or newly employed colleagues coming from a competitor, so we need to take care how such activities are managed.

When involved in recruitment practices or working with a new employed colleague from a competitor, please take care to:

- Not share with candidates Competitively Sensitive Information, even if you are asked to;
- Not request candidates or former colleagues to share Competitively Sensitive Information and refuse if they offer to provide such information;
- Remind persons whom we have recruited from a competitor to not share Competitively Sensitive Information. Likewise, remind them of their obligations towards Verisure to keep our Competitively Sensitive Information strictly confidential, as expressed within the employment agreement; and
- Not ask persons whom we have recruited from a competitor or former colleagues who have left for a competitor to provide Competitively Sensitive Information, even if they offer to.

For more detailed guidance, see the separate “Fair Competition Guidelines for Recruitment and other HR activities” available here.

Creating Internal Documents

Internal documents and/or records of communications with third parties may be critical in a competition law investigation because they provide antitrust agencies with a quick and easy indication of how companies view the scope of the market (or markets) on which they compete and the object or effect of a particular transaction, agreement, course of conduct, or commercial practice.

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Competition authorities routinely get access to pre-existing documents and will attach importance to their content. You should assume that any document you write, receive, or review may be reviewed by an antitrust agency. As a result, it is our duty to create internal documents with care.

Following the guidance below minimizes our risk in the event of an investigation:

- Treat every document you create, even if it is marked internal or confidential, as if it will be read by an antitrust agency;
- Assume that electronic versions of documents will exist forever, even after they have been deleted;
- Be clear and unambiguous. Always be clear if something you said is speculation. Consider how the document might be read out of context;
- Do not restrict competition to professionally monitored alarm services but rather emphasize when there is competition from non-monitored alarms, DIY smart-home solutions, other home security solutions, and business security systems;
- Avoid written references that have legal meaning, like “market shares” or “discriminatory”, without speaking to the Legal function. “Market segment shares” or “segment shares” and “differentiated” can always be written;
- Label any document with market or competitor size estimates prepared internally as “internal estimates” and indicate the sources of the data used for the estimate;
- When using external legitimate source of the information, always make a reference to the exact source of information and the date of it (e.g. in a footnote);
- Avoid statements that risk misinterpretation, or are provocative from an antitrust perspective (*e.g.*, “market power”, “dominant position”, “control of the market”, “choke off the competition” or “high barriers to entry”);
- Avoid underestimating our competitors or focusing on their weakness. We also should not imply that effective competition is limited to another business by saying they are “our number one competitor”, *etc*.
- Assume that the reason given for the value of a transaction, an agreement, the course of conduct, or a commercial practice is of interest to antitrust agencies;
- Do not speculate about antitrust risks, the need for divestiture, or customer complaints in relation to a transaction, and always seek advice from the Legal function;
- Be aware that in a vast majority of cases, our in-house counsel’s advice is not privileged under EU antitrust law. In such cases, they are not protected and can be seized or requested by antitrust agencies like any other document. However, in some countries, such communications may be privileged under specific circumstances. Therefore, consider carefully what legal assessments and advice you include in written internal communications and always label the communication appropriately. Sometimes it may make sense to involve external counsel to ensure privilege; and
- Ensure the early legal review of drafts, keep only the final draft, and limit the distribution of copies.

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Practical Guidance:

Don't	Do
• Use ambiguous wording that can be misinterpreted. Speculate without stating you are. Misrepresent facts.	• Be concise, clear and accurate. Do not leave statements open to interpretation. Make clear when you are speculating.
• Exaggerate our competitive position or give the impression that we have (or could have) a dominant position.	• Reference factors present in the market reflecting a competitive market, *e.g.,* pricing constraints, number of existing and upcoming competitors, possible service options and substitutes and ease with which customers can switch.
• Refer to "market", "market share", "market power". Use the word "discriminatory".	• Use terms such as "segment", "space", "sector", "industry", "business", "category". Use "differentiated" for, e.g., pricing that differs depending on circumstances.
• Underestimate competitors or focus on their weaknesses.	• Accurately reflect the strengths of actual and potential competitors.
• Use words that are overly aggressive ("control", "crush", "choke off", "punish", "kill" or "drive out").	• Use "quality" words to describe product / service offerings in plain, straightforward and low-key language.
• Use wording that can be misperceived as an intent to lessen competition.	• Reflect how business strategies and initiatives will benefit customers in terms of superior products or better pricing.
• Use wording that can be misperceived as an agreement or understanding with a competitor on any topic that could be competitively sensitive.	• Reflect that we as a business have reached independent decisions on any topic that is competitively sensitive.

In addition to taking care in the creation of internal documents, make sure to also only share Competitively Sensitive Information among Verisure colleagues on a need-to-know basis.

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Who does What?

Function	Responsibilities
Country Managing Director	Country Managing Directors are responsible for local implementation of this Group Fair Competition Policy into the business practices of their country. This includes: • **Monitoring**: Ensuring business practice and transaction compliance with competition law; and • **Awareness and training**: Ensuring that employees participate in appropriate competition law training.
Legal function	The Legal function provides advice and guidance on the topics covered by this Policy. All competition law incidents that risk having any external consequences have to be reported immediately to the Group Legal function and Group CLO.
CLO	The Chief Legal Officer is involved in any legal proceeding and investigation procedure relating to competition law infringements. All competition law incidents that risk having any external consequences have to be reported immediately to Group CLO.

Definitions

Competitively Sensitive Information	Data or knowledge that, if disclosed or shared with competitors, could potentially harm a company's competitive advantage or market position. This type of information typically includes pricing, costs, capacity, production, quantities, market shares, marketing initiatives, up-coming launches and recruitment / employment practices, customers, plans to enter or exit markets, or any other important elements of a company's strategy that companies active in a genuinely competitive market would not have an incentive to reveal to each other.
Right To Match	Contractual provision or legal right that gives one party the opportunity to match or counter a third-party offer when a specific business transaction or opportunity arises.
Most Favoured Nation (MFN)	Provision in an agreement that ensures that each party to the agreement will receive treatment no less favourable than that granted to any other party. As a result, if one party grants certain concessions or benefits to another party as part of an agreement, it must also extend those same concessions or benefits to all other parties with which it has MFN status.

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Questions and Support

We take strict compliance with competition laws and always Doing the Right Things very seriously. Additionally, violations of competition laws can cause severe financial and reputational damage. Whenever in doubt, always seek guidance from a colleague in our Legal function.

We encourage those who encounter or witness misconduct within the organisation to Speak Up, either to their line Manager, Legal or HR or through the Speak Up platform (https://www.verisurespeakup.com). We investigate all suspicions and take disciplinary actions where they are substantiated. We have zero tolerance to retaliation against those Speaking Up in good faith.

Version Control

Version	Effective Date	Description of Change	Author	Approval Trail
1.0	May 2019	First issue	Group CLO	Group Management Team
2.0	September 2023	Review and addition of paragraphs relating to Gathering competitive intelligence and Interactions with candidates and employees	Group CLO	Group Board

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