

Code of Conduct

mySafety strives to achieve sustainable operations that are profitable in the long term. This Code of Conduct is part of the work involved in greater social responsibility and environmental awareness throughout the entire business and supplier chain. It covers all suppliers and their subcontractors, as well as all other business partners of the mySafety Group and the fellow subsidiary SBM (hereinafter referred to as mySafety). mySafety will give preference to suppliers that take a progressive approach towards issues of social responsibility and environmental awareness.

Suppliers and business contacts are expected to carry out their operations in accordance with the applicable legislation and regulations in the countries in which they operate. They also commit to following mySafety's Code of Conduct by signing this document. If the requirements of the Code of Conduct differ from the national legislation in any country, the law will always take precedence. In such a case, the supplier shall notify mySafety's CEO before signing the Code of Conduct. However, in certain cases mySafety's requirements may go further than the national legislation and in these cases mySafety's requirements shall apply.

This Code of Conduct is based on recognised international conventions and guidelines, such as the UN Universal Declaration of Human Rights, the UN Convention on the Rights of the Child and applicable ILO conventions. This Code of Conduct is also characterised by mySafety's values: responsible, passionate and considerate. Our vision is to create security for everyone. Our responsibility involves our products being manufactured, distributed and used in an environmentally and socially sustainable manner. This Code of Conduct defines the requirements that we place on our suppliers and their subcontractors, and on our other business partners. Through this Code of Conduct, we meet our commitments to mySafety's board, employees, customers and other stakeholders. mySafety's suppliers and other business partners are obliged to inform their subcontractors about mySafety's Code of Conduct. They shall also ensure that it is followed at all workplaces where goods are manufactured, packed, distributed or otherwise dealt with, or where services are carried out on behalf of mySafety. Most of our requirements are based on internationally accepted standards.

We reserve the right to check compliance with our requirements by making visits ourselves or by having visits carried out by third parties, either with or without advance notice. Breaches of this Code of Conduct may lead to cooperation between mySafety and the supplier/business partner being terminated.

WORK AND HUMAN RIGHTS

Fair treatment

All employees shall be treated with respect and dignity, and the workplace shall be free from harassment. No employee of our suppliers, their subcontractors or other business partners may be harassed or offended physically, sexually, psychologically or verbally.

Preventing child labour

According to the definition contained in the UN Convention on the Rights of the Child, every person up to the age of 18 is a child and therefore has the right to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with his or her education, or to be harmful to his or her health or physical, mental, spiritual, moral or social development. (See also ILO conventions 138 and 182 and the UN Convention on the Rights of the Child.)

Child labour is not permitted. The minimum age for employment is 15. If the national legislation has a higher minimum age for employment, this age shall apply. In accordance with ILO's rules, mySafety can still permit those aged 14 and over to carry out simpler tasks, if the national legislation permits this.

The company shall take the preventive measures required in order not to employ anyone who is younger than the minimum age for employment.

Preventing forced labour

No form of forced, indentured or penal labour is permitted. Prisoners and illegal workers must not be used in the production of mySafety's goods and must not carry out services on behalf of mySafety (see also ILO conventions 29 and 105). Employees must be free to leave their work or terminate their employment after a reasonable period of notice. Employees must not be asked to surrender ID documents, employment permits or any other form of deposit as a condition of employment.

Freedom of association

All employees shall have the right to form or join the organisations of their choice, and the right to collective negotiations. mySafety does not accept employers taking disciplinary or discriminatory action against employees who form or join an organisation in order to protect their statutory rights in a peaceful manner (see also ILO conventions 87, 98 and 135).

Preventing discrimination

No employee may be discriminated against on employment or when assigning work tasks on the grounds of gender, race, skin colour, age, pregnancy, sexual orientation, belief, political opinions, nationality, ethnic origin, illness or disability (see also ILO conventions 100 and 111).

Employment contracts and terms

All employees have the right to a written employment contract, written in the national language. Employment terms shall be detailed in this contract. The employer is obliged to ensure that all employees are informed of their statutory rights and obligations.

Pay and benefits

The following quotation from article 23.3 of the UN Universal Declaration of Human Rights shall apply to mySafety's suppliers and business partners in this context:

"Everyone who works has the right to just and favourable remuneration ensuring for himself and his family an existence worthy of human dignity..."

Wages shall be paid regularly and punctually. When setting wages, the employee's experience, qualifications and performance shall be taken into account. mySafety's minimum requirement is that the employee pays at least the statutory minimum wage, customary industry pay or pay that has been established through collective agreement (the highest level applies). All other forms of statutory benefits and remuneration shall also be paid. Unreasonable deductions may not be made. The employee has the right to a written payslip including the basis of calculation.

Working hours and leave

Ordinary working hours may not exceed the statutory maximum limit or 48 hours per week. The number of overtime hours may not exceed the number of hours stated in the relevant country's legislation. In the absence of working hour limits, overtime shall not exceed 12 hours per week. Statutory remuneration shall be paid. Employees

who receive piecework payment should not be excluded from the right to overtime payment. All employees have the right to at least one day's leave during every seven-day working period. Employees shall receive statutory paid leave with the correct remuneration. This refers to e.g. holidays, parental leave and sick leave.

The rights of migrant workers

Migrant workers shall, in all respects, have the same benefits as domestic employees. The employer shall be responsible for all commission or other fees charged in connection with employing migrant workers. The employer may not demand that employees submit their ID documents or pledge any security as a condition of employment. Responsibility for employees who are engaged through agents or contractors remains with mySafety's suppliers and other business partners. These employees are therefore covered by this Code of Conduct.

HEALTH AND SAFETY

Suppliers and mySafety's other business contacts shall ensure that employees work in a safe and secure working environment. The supplier shall appoint a management representative who is responsible for health and safety.

Work protection

Our suppliers and other business partners shall always prioritise their employees' safety. We do not accept the use of dangerous equipment or work being carried out in buildings of a poor standard. Staff shall be provided with suitable protective equipment. Any injuries and illness shall be documented and reported in an appropriate manner, and the supplier shall take action to improve the situation.

Where hazardous substances are used, washing facilities shall be available. Electrical equipment and cables shall be insulated and safe, and shall be inspected and repaired regularly. First-aid kits shall be available in several locations within the premises, and shall be clearly labelled. The workplace premises shall be maintained and cleaned regularly, and shall offer a healthy working environment with good ventilation in accordance with what is produced at the premises. Fresh, clean drinking water shall be available in several locations within the premises.

Fire safety

Emergency exits on all floors shall be clearly marked with good illumination. No part of the evacuation route may be blocked. Evacuation via the emergency exits shall always be possible during working hours.

Training and information

All staff shall receive regular information and training about health and safety in the workplace. This shall also include various drills, e.g. fire drills, accident drills and practice in the use of first-aid kits and other equipment. Regular evacuation drills shall be carried out, and shall cover all employees. Evacuation plans and fire safety equipment shall be in place, with clear warning signs in the workers' language at equipment or substances that could be hazardous or toxic.

Living conditions

If the company provides accommodation for its employees, the fire safety and hygiene provisions detailed in point 3 above shall also apply to this accommodation. Accommodation shall be separate from the workplace, and shall have a separate entrance. Residents shall have free access to their accommodation.

THE ENVIRONMENT

Environmental and emission-related issues are becoming increasingly important worldwide. mySafety expects the company's suppliers and other business partners to accept their responsibility in this respect. Our suppliers shall follow all environmental legislation and regulations that apply in their countries of operation. One particularly important issue for us is how the manufacture and transportation/distribution of our products affects the climate.

Environmental permits and reporting

The company shall have the relevant environmental and operating permits, and shall report in accordance with these.

Handling chemicals

The supplier shall identify hazardous substances and ensure that all applicable legislation and regulations for these

are followed. Chemicals used shall comply with REACH's and mySafety's chemical restrictions for each individual product type. Chemical containers shall be correctly labelled and stored securely. A material safety data sheet (MSDS) in the local language shall be available in the workplace. mySafety would like the supplier to make an active choice of less harmful substances if alternatives are available. The instructions of the material safety data sheet shall be followed (see also ILO convention 170).

Waste, emissions and reducing resources

In many parts of the world, access to clean water is limited. We should therefore be as efficient as possible in our use of water. All waste water from wet processes shall be cleaned before being discharged. As a minimum, the quality of cleaned waste water shall comply with local statutory requirements.

All waste, particularly hazardous waste and IT waste, shall be dealt with responsibly and in accordance with local legislation and regulations.

The supplier shall carry out and document measures to reduce the use of water, energy and other resources. Recycling and reusing materials is part of this, as are more efficient processes to reduce the use of resources.

Energy-efficiency measures and the choice of energy source shall be documented and reported to mySafety as part of the work involved in reducing climate-related emissions.

BUSINESS ETHICS

mySafety strives to ensure that good business ethics prevail in all business relationships, with customers, business partners and authorities. mySafety takes a zero tolerance approach towards all forms of corruption and unethical business practices, and has initiated measures to combat these. These measures include a training programme for all the company's managers and clarifications in policy documents.

Suppliers and other business contacts shall follow all applicable anti-corruption legislation and regulations. Suppliers and other business contacts shall also respect mySafety's assets, reputation, brands and intellectual rights.

Bribery and corruption

mySafety does not accept any form of bribes – gifts, entertainment and personal services – being offered or received, regardless of the form, method or purpose. This requirement applies to all mySafety's business contacts and employees.

Remuneration paid to agents shall be reasonable, and shall only relate to legitimate services.

Competition and conflicts of interest

mySafety does not participate in unfair, misleading or anti-competitive agreements or arrangements.

All mySafety's employees, units and suppliers shall follow applicable competition legislation. In the event of any doubt regarding competition legislation, legal advice must be sought.

mySafety does not take part in activities that we cannot openly account for or report on, and does not make any business decisions based on personal interests, loyalties or relationships, such as an individual's own investments or other business commitments outside mySafety.

Whistle-blowing

We expect any of our employees and business partners, and our business partners' employees, who suspect breaches of this policy – within mySafety's or a business partner's operations – to report these suspicions. In the first instance, these suspicions should be reported to a line manager. If for some reason this is not the best way of providing information, mySafety has initiated a whistle-blowing function, with a contact person within the company.

SYSTEMS THINKING

In order to be able to comply with mySafety's Code of Conduct and local regulations relating to labour law and environmental issues, it is essential that our suppliers and other business partners have the policies and management systems in place that their operations require.

CHECKS AND COMPLIANCE

Openness and cooperation

mySafety expects all suppliers and other business partners to respect this Code of Conduct and to do their very best to comply with its requirements. We also expect openness from our suppliers and other business partners. They must not consciously mislead our auditors. We believe in cooperation, and like to work together with our suppliers and other business partners to achieve sustainable solutions and to support those suppliers and other business partners who comply with our Code of Conduct.

If any deviations from mySafety's Code of Conduct arise, these should be reported immediately to the CEO/CR Manager.

Checks

All suppliers and other business partners shall keep mySafety/the CR Manager notified of where our products are manufactured. This information shall also include subcontractors and home working. Relevant documents shall be saved and available for inspection when checks are carried out. We reserve the right to visit all units manufacturing products or carrying out services on behalf of mySafety, at any time. We also reserve the right to engage an independent third party to carry out checks and to assess compliance with our Code of Conduct.

During such visits, we require unlimited access to all premises and all documents, and the opportunity to interview all employees. We should also have the opportunity to give employees mySafety's contact details.

The supplier chain

mySafety's Code of Conduct applies to our direct suppliers, other business partners and manufacturers of products on mySafety's behalf, and to their subcontractors further down the supplier chain. We would like our suppliers and other business partners in turn to place social and environmental requirements on their own suppliers further up the chain. These requirements may include forbidding the use of forced labour and child labour, or certain chemicals.

Improvement measures

The aim of mySafety's checks is to find out whether actual circumstances or conditions at a workplace deviate from the requirements of this Code of Conduct. As a rule, the company being checked will have the chance to make corrections by proposing and implementing an action plan. mySafety will monitor the implementation of this plan and will check that the deficiencies have been rectified. If the company fails to carry out sustainable improvements within the stipulated deadline, its business relationship with mySafety may be harmed. Unwillingness to cooperate or repeated gross breaches of mySafety's Code of Conduct or local legislation may result in fewer orders or commissions, and ultimately in the business relationship with mySafety being terminated completely.

I have read mySafety's Code of Conduct and agree to perform services in conformance with the standards of practice of this code.

Date

Signature

Printed name

