

Anti-Corruption Policy



Securitas Values and Ethics (the "Code") sets out principles for business ethics that all Securitas entities, employees and directors (for the purpose of this policy, collectively referred to as "Securitas Companies and Professionals") are required to follow.

The Code sets out the main principles for, among other things, fair competition, anti-trust, anti-bribery, and anti-corruption (including principles for entertainment and acceptable gifts), money laundering and conflicts of interest.

The purpose of this policy is to further develop the principles for appropriate and ethical conduct with regard to matters of anti-corruption, entertainment and gifts, as well as certain forms of conflict of interest. This policy complements local legislation applicable to the Securitas business in all parts of the world.

All Securitas Companies and Professionals are required to abide by domestic laws, the Code, and this policy.

This policy is applicable to all Securitas Companies and Professionals and shall be implemented in all cooperative relationships within Securitas business to the furthest extent possible.

It is the responsibility of all divisional/regional presidents and through them, each country president, to ensure that the policy is fully understood and implemented in their areas or countries of responsibility. The strict compliance with this policy is mandatory.

1. Principles for anti-corruption: zero tolerance

Securitas believes in a free market for the provision of our services, in a free and fair competitive environment. Consequently, within the Securitas business, there is **ZERO TOLERANCE** for any type of bribes, facilitation payments or other improper benefits, corruption between private parties, money laundering, financing of terrorism, simple and aggravated collusion in all of its forms, and influence peddling contrary to the Code, this policy, local laws and regulations, industry standards or the code of values and ethics.

Failure to comply with this policy and local laws and regulations may have serious consequences for Securitas as a Group as well as for all Securitas Companies and Professionals themselves. Therefore, violations of this policy and the Code are **NEVER** in the interest of Securitas and reporting all such practices as well as offers or requests to provide any improper benefits will always serve the Securitas Group's best interest.

To avoid suggestions of unlawful or unethical behavior, Securitas Companies and Professionals shall, at all times, exercise good judgement and make every effort to avoid situations that may lead to an impression or even a suspicion of corrupt behavior. In case of doubt about a situation that You consider suspicious due to possible corrupt behavior (direct or indirect commission of bribery, corruption between private parties, collusion and influence peddling) and/or about the commission and/or concealment of money laundering and terrorist financing crimes, see heading 8 hereof.

It is the responsibility of each divisional/regional president and country president to adopt proper procedures to ensure that all Securitas employees are aware of, understand and comply with local laws, rules and regulations, the Code as well as this policy, in the country in which they operate.

Anti-corruption legislation in certain countries has extra-territorial reach, meaning that it also applies to acts performed outside of the country that enacted the laws. For example, the US Foreign Corrupt Practices Act (the FCPA) and the UK Bribery Act. As Securitas conducts business within and from both the USA and the United Kingdom, the scope of these acts applies also to Securitas Companies and Professionals in other countries.

Likewise, in Peru there are laws in force, which establish sanctions ranging from closing down offices, loss of administrative authorizations (licenses, concessions, and other authorizations), economic penalties, even remove the legal entity from the public registry, such as:

- Act 30424, Law regulating the administrative responsibility of legal entities for the crimes provided for in the articles of the Criminal Code:
 - o 384 (Simple and aggravated collusion)
 - o 397 (Generic active bribery)
 - o 397-A (Cross-border active bribery)
 - o 398 (Specific active bribery)
 - o 400 (Influence peddling)
- Legislative Decree 1106, Legislative Decree on the effective fight against money laundering and other crimes related to illegal mining and organized crime) and money laundering (Art. 1, 2, 3 and 4).
- Decree-Law 25475, Decree-Law establishing penalties for terrorist offences and procedures for investigation, filing the proceeding and trial (Terrorist financing, Art. 4-A).

- Act 30835, Law that amends Law 30424 and includes the crimes of collusion and influence trafficking into the prevention model.
- Legislative Decree No. 1385, legislative decree that includes the crimes of corruption in the private sector Art. 241-A, and corruption between and within companies. 241-B into the Criminal Code.

Also, this policy also seeks to ensure compliance with applicable domestic and foreign legislation.

2. Objectives of the compliance system

This Anti-Corruption Policy – as well as the measures and design of the compliance management system drawn from it – has taken into consideration our organizational context, the requirements set forth in ISO 37001:2016, the laws and regulations on compliance and crime prevention in force and applicable to the activities carried out by Securitas and the Securitas Group. The necessary resources for its proper enforcement and effectiveness have been implemented. Furthermore, from time to time this policy shall be subject to reviews and continuous monitoring to introduce all necessary improvement measures and be able to adapt to any future context change in order to achieve the objectives established in **FOR-SIG-08 Objectives, Indicators, Targets**.

3. Definition of corruption

For the purpose of this Policy, corruption is defined as any act which is intended to grant, offer or promise improper benefits or anything of value to induce the abuse of someone's entrusted power for illegitimate individual or group benefit or advantage. Corruption includes a wide variety of behavior including bribery, corruption between private parties, collusion, influence peddling, conflicts of interest and misuse of company assets.

Bribery is generally defined as promising, offering or giving, receiving or soliciting an undue advantage to a person or entity, either directly or through an intermediary, in order that the person or entity should perform, or refrain from performing, an act in breach of their business, public or lawful duties, but the exact definition varies from country to country.

The concept of a bribe or a corrupt behavior shall include the provision or receipt of, as well as the facilitation of, for example:

- cash or other forms of payment or benefits to ensure being awarded a contract and / or obtaining a permit or license and / or not complying with one or more Securitas procedures;
- inappropriate donations and / or contributions to political parties seeking to lead to specific benefits;
- certain benefits without a financial value, such as memberships in clubs, prestigious awards or similar;
- gifts and / or entertainment and / or travel intended to influence the recipient to act in specific way;
- so-called facilitation payments to obtain a decision or facilitate a process, even if such procedures are accepted or commonly practiced locally; and
- sponsoring parties and / or activities seeking to lead to specific benefits.

It is not necessary that the benefit be given or offered to the person exercising the power. It may also be given or offered to someone that can influence the decision maker in different ways. Under no circumstances should any kind of present or benefit be given to government or public entity officials.

Collusion is defined as the unlawful agreement between an individual and a public officer for the latter to intervene directly or indirectly, by reason of his position, in the award of a public bid either of goods, works or services in favor of the individual.

Influence peddling is when someone that has a real or apparent influence, receives, makes someone receive or pledges an advantage or benefit for himself or for a third party by offering to intercede before a public officer that is of his acquaintance, that he is getting to know or has known in a judicial or administrative process.

The definition of corruptive practices or bribery varies from country to country. In no way this policy is meant to allow procedures that are not legal and/or not in line with business ethics in a Securitas country, but to supplement and strengthen the requirements for a specific country that has less-developed anti-corruption laws.

4. Allowed gifts and entertainment

All permitted gifts and entertainment shall be treated as per the Securitas Gift Policy, which is applicable to all companies of the Securitas Group.

5. Applicability to third party relationships

Although Securitas cannot enforce this policy on companies or persons that are not part of the Securitas Group, Securitas Companies and Professionals shall make all reasonable efforts to include the principles of this policy in agreements entered into with all types of partnerships and other business relationship or to otherwise ensure that the principles of the Code and of this policy will apply to all relationships in which Securitas is involved. Special care should be taken in the selection and management of external agents and representatives. Note also section 6 hereof about the risk assessment of third-party relationships.

Whenever a third party requests, offers or delivers any form of bribe or other improper benefit, Securitas Companies and Professionals shall report this to their direct superior and the latter to the Corporate Crime Prevention Officer. As soon as reasonably possible, it should be made clear to the third party that Securitas Companies and Professionals can never accept or give any type of bribe or improper benefit. Thereafter, the General Manager or his designee shall ensure that an evaluation of the possibility to continue the relationship is carried out. If the decision taken is not to abandon the relationship, the General Manager shall be responsible for ensuring that such a decision is only made following an appropriate risk assessment and that appropriate safeguards are put in place to prevent future incidents contrary to this policy.

6. Risk assessment

The General Manager is responsible for continually assessing the risk of having any Securitas Company or Professional involved in any type of corrupt behavior, communicating such risks to the organization (e.g. through the Business Plan for Enterprise Risk Management or through other channels) and taking appropriate measures to prevent this from happening.

When entering into new jurisdictions, committing to different types of cooperative relationships or being involved in mergers or acquisitions of entities, all Securitas Companies and Professionals shall ensure that a full assessment of the risks for corruption, bribery and other improper benefits in the country or relationship in question has been conducted.

Due diligence procedures shall include appropriate investigations about past and present anti-corruption measures and the overall risk exposure with regard to corruption and bribes for each acquisition target or prospective partner. Each project manager or manager shall be responsible for ensuring that such processes are carried out routinely at the beginning of new relationships and continuously throughout the relationship if and when necessary.

7. Training

All Securitas Companies and Professionals shall undergo training to ensure proper understanding of the principles of this policy and local rules and regulations on anti-corruption. Such training shall be appropriate for the position of the individual in question and his responsibilities and risks within Securitas as well as the local situation and risk assessment.

8. Reporting and investigations

As is the case with the Code, all Securitas Companies and Professionals are required to report any suspicions of improper behavior contrary to this policy to their immediate managers and the **Employee Ombudsman**. It shall be clearly communicated to all employees that no employee will suffer negative consequences for refusing to pay or accept bribes or engage in corruptive practices, even when such refusal may result in the loss of business for the company.

All reported events or suspicions shall be investigated and followed-up appropriately, following the same procedure used for investigating complaints against non-compliance with the Code.

If an informant does not wish or is unable to report a suspicion to his or her direct superior or to another officer from his/her organization, all such issues should be reported through the Securitas Integrity Line at

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www.securitasintegrity.com , via e-mail at integrity@securitas.com. The updated contact information can be found on the Securitas web-site <http://www.securitas.com/ar/es-ar/>

Any identified violation against this policy or local anti-corruption, bribery, money laundering, and / or financing of terrorism laws and regulations shall result in a disciplinary action that fits the violation, including employment termination. As well, it may also result in fines or penalties for which the individual employee may be held accountable.

9. Corporate Crime Prevention Officer

To ensure the utmost independence, Securitas has defined a specific position within our corporate organizational chart called Corporate Crime Prevention Officer (CCPO) . The officer holding this position is granted adequate capacity, independence and authority. The CCPO reports directly to the Board of Directors of each Securitas Group company and has the capacity to report directly to the President of Securitas, in turn, they will ensure the correct implementation, monitoring and continuous improvement of our compliance management system according to the defined and agreed requirements. The designated CCPO shall be available to all members of our organization so to advise, guide and support them in matters of ethical performance and compliance. Likewise, our group will have all the necessary resources, in a proportionate manner, to carry out the actions, measures and controls planned in our **FOR-SIG-55 Process Risk Analysis**.

10. Review and follow-up

Compliance with this policy by all Securitas Companies and Professionals will be monitored and followed up as part of the Securitas Enterprise Risk Management process, which includes self-assessments, internal and external audits and routine follow-up of all reported matters. Securitas will regularly review this policy in order to comply with the requirements of our Compliance Management System, always geared towards continuous improvement.



Wilson Gómez-Barrios Rincón
Country President