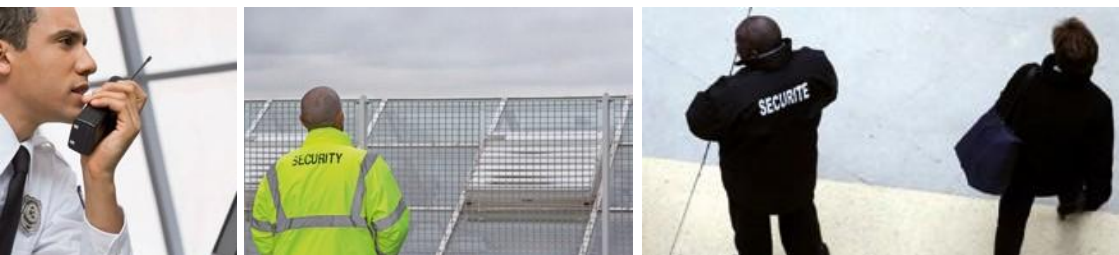


Code of Conduct



Introduction

With this Code of Conduct and Ethics, (hereafter “the Code”), the International Security Ligue (hereafter “the Ligue”) presents a unified approach and framework of conduct and ethics. The purpose of the Code is to affirm the Ligue’s commitment to human rights and to setting a standard about the way the Ligue members conduct business and interact with stakeholders, in order to comply with all applicable laws and regulations and have a positive influence in the society and the communities in which they operate.

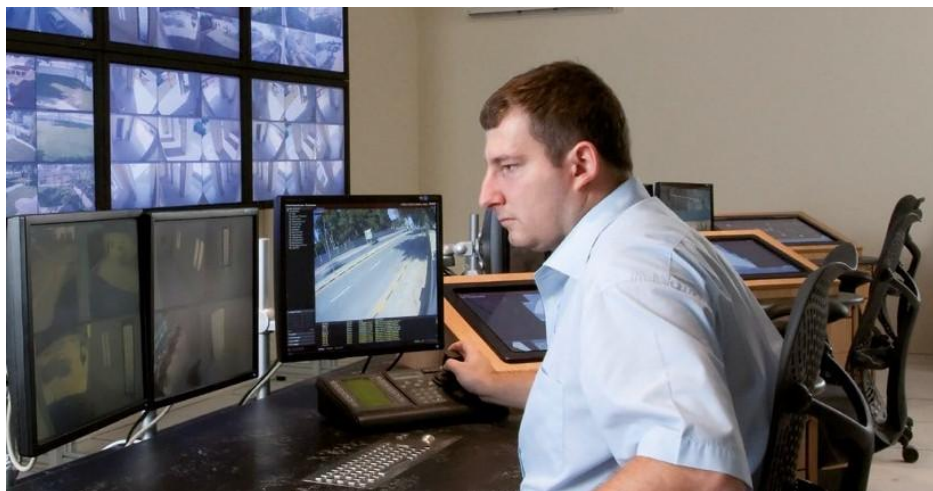
The Ligue recommends the Code of Conduct and Ethics to all its members as a set of core standards.

As to each Ligue member signatory to this Code, the provisions of this Code are subject to all applicable laws.

The Code builds upon principles set forth in established standards issued by the United Nations (UN), the Organisation for Economic Co-operation and Development (OECD), the International Labour Organisation (ILO) and other codes related to private civilian security companies and their services and products, as well as on the Ligue “Objective Vision” Declaration of 1st July 2011. It also integrates key principles of business ethics, including compliance with anti-bribery, competition and intellectual property laws.



The members of the Ligue maintain an extended collaboration with a broad range of stakeholders involved in and influenced by their operations. The primary stakeholders for the Code are the Ligue’s member companies’ personnel, customers, suppliers and other business partners, authorities on all levels, society and the communities in which they operate. The Code also covers the business relationship between the members of the Ligue themselves as well as their competitors outside the Ligue.




CHAPTER 1: Human Rights

1.1. The Ligue member acknowledges that security is a fundamental need, shared by individuals, communities, businesses, and governments alike. While acknowledging that difficult security issues are faced by private security companies, the Ligue member recognizes that security and respect for Human Rights can and should be consistent.

1.2. The Ligue member shall support and respect, when conducting business, the dignity of all human beings and will endeavour to observe all applicable international humanitarian and human rights laws.

The Ligue member providing civilian private security services in areas of armed conflict shall respect the standards of international humanitarian and human rights laws applicable in each area.





CHAPTER 2: Laws and Regulations Governing Private Security

2.1. The Ligue member shall carry out its private security operations in compliance with applicable laws and regulations governing the private security industry.

2.2. Where little or no regulation exists, the Ligue member will strive, in cooperation with the concerned authorities to develop and implement a set of minimum regulations in order to enhance the professionalism and the quality of the services provided and alert relevant authorities to criminal organisations entering or being active in the market.

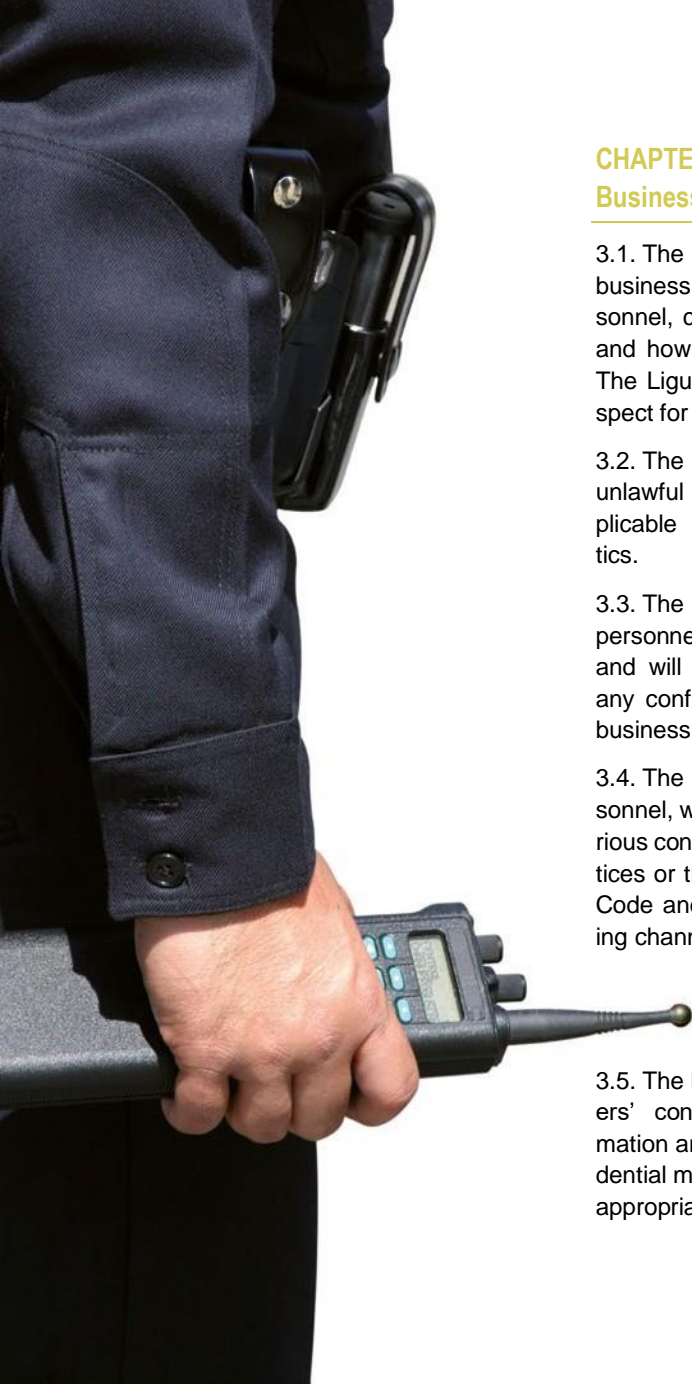
2.3. The Ligue member shall comply with existing laws and regulations, and shall establish its own procedures regarding screening, vetting and licensing of its personnel according to those laws and regulations. In the absence of regulatory requirements, the Ligue member will, to the extent lawful and reasonably practicable, establish reasonable procedures designed to prevent personnel with a criminal background demonstrating unsuitability to work in the security industry from being hired or deployed. Ligue member personnel will be trained in accordance with applicable legislation and/or licensing standards.

2.4. Operations will be carried out in line with compulsory obligations regarding uniforms, communication tools, use of dogs, use of weapons or any other operational working method. In the absence of regulatory requirements, the Ligue member shall adopt internal rules for the proper conduct of such activities.

2.5. The Ligue member shall only provide services to customers which can be legally provided and are conducted within the limits of legally allowed operational methods. The Ligue member will also subscribe to compulsory insurances in accordance with applicable regulation and will endeavour to obtain reasonable coverage for third party liability. The Ligue member shall endeavour to educate potential customers about the importance of the compliance framework for security companies in their markets.

2.6. Within the communities in which it operates and within society as a whole, the Ligue member will promote the rationale of regulations for the security industry and raise awareness regarding the positive impact of regulatory frameworks. The Ligue Member will also endeavour to convince communities to engage and cooperate only with legally and regulatory compliant private security companies.





CHAPTER 3: Business Ethics

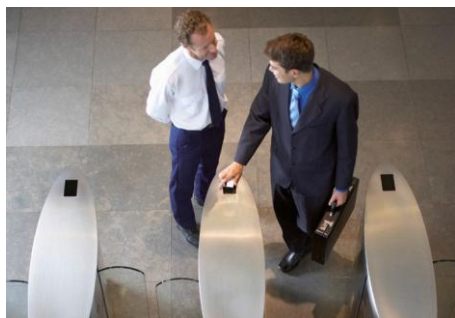
3.1. The Ligue member commits to proper business conduct in how it treats its personnel, customers and business partners and how it interacts with its competitors. The Ligue Member shall demonstrate respect for laws and regulations.

3.2. The Ligue member shall refrain from unlawful discrimination based on any applicable protected personal characteristics.

3.3. The Ligue member shall prohibit its personnel from taking or offering bribes and will require that its personnel avoid any conflicts of interest that might affect business decisions.

3.4. The Ligue member will allow its personnel, without fear of reprisal, to raise serious concerns about illegal business practices or those which otherwise violate the Code and will provide appropriate reporting channels for this purpose.

3.5. The Ligue member shall treat customers' confidential and proprietary information and intellectual property in a confidential manner and shall protect it from inappropriate disclosure and misuse.



Anti-competitive agreements

3.10.2. The Ligue Member must not agree or give any concrete recommendations or conclusions in such a form that they induce competitors to behave commercially in an identical manner on the market.

3.10.3. The Ligue Member must not enter into agreements that allocates customers or territories amongst them.

3.10.4. The Ligue Member must take its business decisions independently and must not influence another Ligue Member's business decisions.

3.10.5. The Ligue Member must not coordinate pricing, production or other competitive practices, decisions, or strategies with competitors.

3.6. The Ligue member shall ensure that its customers will receive relevant contract information in a transparent, accurate and timely manner.

3.7. The Ligue member shall ensure that customers' complaints will be treated and followed-up in an appropriate manner.

3.8. The Ligue member shall treat its suppliers and other business partners in accordance with principles of good faith and fair dealing.

3.9. The Ligue member shall encourage its suppliers and other business partners to comply with and promote standards of human rights and business ethics.

3.10. Compliance with competition law

3.10.1. The Ligue Member acknowledges that all behaviour must be compliant with competition law principles as it continues to compete vigorously with other Ligue Members and non-members.

Exchange of information

3.10.6. The Ligue Member must not exchange any company-specific information, including information on prices, intended production volumes and sales, intended future terms and conditions upon which products are supplied or obtained, customer information such as contract terms,

current order etc. with any competitor. A brief overview of dos and don'ts in relation to exchange of information is provided in the scheme below:

The Ligue Members **cannot** discuss the following subjects:

- ✗ Sales or purchase prices
- ✗ Raw materials or product composition
- ✗ Marketing or product plans
- ✗ terms and conditions of trade
- ✗ market shares
- ✗ Current and forecast production, output sales or orders
- ✗ Anticipated supply
- ✗ Current and forecast production capacity
- ✗ Anticipated downtime
- ✗ Customers or bids
- ✗ General business strategy
- ✗ Any information which would enable competitors to make forecasts of rival's future market behaviour

The Ligue Member **can** discuss the following subjects:

- ✓ Sufficiently aggregated, anonymous and historical data (except for information on prices), in a manner which cannot be reverse engineered to identify individual Ligue Members
- ✓ key economic factors affecting industry structure
- ✓ key economic factors affecting industry structure
- ✓ report on technology trends in key markets/product areas
- ✓ Developments of common projects in relation to industry standards or EU policies that are decided in and open, fair and transparent manner

3.10.7. The Ligue Member acknowledges that the above ban applies in both formal and informal settings, including both meetings, coffee breaks and situations outside a setting planned by the Ligue.

Compliant conduct of Ligue meetings

3.10.8. To comply with applicable competition laws at Ligue meetings, it is mandatory for the Ligue Members to ensure:

- Prior distribution of a written agenda outlining the topics for discussion (and which shall not be deviated from).
- Distribution of compliance guidelines and a competition law reminder is read out at every meeting of any kind amongst the members of the Ligue (whether in-person, web-meetings, over the phone or via messaging services).
- That minutes are recorded, including discussed topics and participants.
- That minutes are sent for approval to all participants and a copy of the final minutes is kept by the Ligue's Secretariat.
- To avoid any discussion on the topics listed under section 3.10.6 – exchange of information.
- To invite a competition counsel to attend the meeting if the Ligue finds it necessary due to the subject of the meeting.

- To interrupt any potentially unlawful discussion or document distribution.
- That interruptions and/or expression of concerns will be recorded in the minutes from the meeting.
- That the meeting is ended if unlawful discussion or behaviour continues and that this is reported to the Ligue's Secretariat without delay.

3.10.9. The Ligue Member must be aware that personal notes may be taken and used as evidence by the European Commission and/or national competition authorities during investigations.

3.10.10. More detailed guidance, including rules for the conduct of meetings in compliance with competition law can be found in the Competition Law Compliance Policy of the Ligue, which is attached as Appendix 1.

3.11. Any competitor, Ligue Member as well as non-Member whose behaviour is illegal or unfair or not in accordance with the Code and impacts negatively on the functioning or the reputation of the industry shall, if the behaviour is not ended, be reported to the competent authorities by a representative of the Ligue.

3.12. The Ligue member shall make efforts to provide a positive influence in the communities in which it operates.



CHAPTER 4: Working Conditions

4.1. With regard to working conditions and occupational health and safety, the Ligue member shall comply with statutory requirements and strive to ensure that the workplace and its operations do not endanger the health and safety of any personnel.

4.2. The Ligue member shall act in accordance with principles of equality of treatment, showing respect, dignity and empathy towards personnel. The Ligue member shall prohibit any kind of unlawful discrimination based on applicable protected personal characteristics.

4.3. All screening and selection processes shall be conducted by the Ligue member properly and in compliance with applicable regulations.

4.4. The Ligue member shall conduct employment commencement and termination according to applicable regulations.

4.5. Upon commencement of employment, the Ligue member shall give new personnel all necessary instructions and training in order to carry out their duties effectively and efficiently.

4.6. The Ligue member shall ensure that it pays wages corresponding at least to the minimum wage prescribed by law. Wages shall be paid at an agreed time and in a form that is practical for both the personnel



and the employer and complies with applicable law. Personnel shall be informed regularly and in a detailed, comprehensible manner of the composition of their remuneration.

4.7. If the working conditions change in the course of employment, the Ligue member shall notify personnel in due time and advise them of any need for additional qualifications, in accordance with the applicable legislation regarding union rights and collective bargaining.

4.8. Pursuant to the applicable laws of the nation under which a Ligue member operates, the Ligue member shall respect the right of personnel to form, to join or to be active in legal associations or organisations of their choice for the purposes of furthering and protecting their employment interests and for the purposes of collective bargaining.

4.9. The Ligue member shall establish procedures to deal with any grievances raised during the course of employment in a timely manner.

4.10. The Ligue member shall take an active approach to understanding the needs of and building relationships with its personnel and their representative organisations in each particular country.





CHAPTER 5: Environment

5.1. The Ligue member commits to taking the environmental impact of its business into account. It shall actively strive to reduce the overall effect of its business activities on the environment and ensure that they will contribute to the benefit of its stakeholders without compromising the needs of future generations.

5.2. The Ligue member shall ensure that its business activities comply with applicable laws and regulations regarding the protection of the environment.

5.3. The Ligue member shall obtain and maintain all required environmental permits and registrations and follow their operational and reporting requirements.

5.4. The Ligue member shall continuously seek ways to reduce the consumption of resources, emissions and waste.

CHAPTER 6: Compliance and implementation

6.1. Each Ligue member which signs the Code agrees to implement the Code and to operate in compliance with the Code's principles and standards.

6.2. The Ligue member shall disseminate and promote the Code as widely as possible throughout its organisation through its internal and external communication channels.

6.3. The Code will be the subject of periodic evaluation by a working group, for examination, assessment and update, as determined by the Ligue.

Adopted Zollikofen, September 18, 2023



The Ligue Code of Conduct and Ethics has been formally adopted by all Ligue Members





Securité 2000



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