



## *SERIS Business Code of Conduct*

FOR-SB-GEN-06 SERIS Business Code of Conduct - edition 8– 12/03/25

### Introduction

At SERIS in Belgium with affiliated concerned companies SERIS Security NV, SERIS Technology NV, SERIS Logistics NV, SERIS Event Security BV and SBD NV, we are deeply committed to building a safer world. Central to this commitment is our dedication to sustainability and the principles of Environment, Social, Governance (ESG), encapsulated by the pillars of People, Planet, Profit, and Partnership. We firmly believe that these values are not only integral to our operations but must also be upheld by all our business partners, including suppliers, customers, and stakeholders. We expect all our partners to align with international and national laws governing ethics, compliance, environmental stewardship, and human rights, in accordance with the standards set forth by the International Labour Organization (ILO), the Organization for Economic Co-operation and Development (OECD), and the ten principles of the United Nations Global Compact. With SERIS memberships of 'UN Global Compact' and 'The International League of Security Companies', SERIS demonstrates its devoting and commitment to foster ESG within their own company and security community.

### Purpose

The purpose of SERIS is to foster and 'Build a safer world' by offering security solutions that combine the best of people and technology.

### Values

Our values reflect our history, our identity and our ambitions in the security market. They embody our corporate culture and are expressed through the daily actions of all our teams. They structure our professional approach and shape our relationships with all our stakeholders in all the countries where we operate.

#### **EXPERTISE: EXCELLING IN OUR BUSINESS EVERY DAY**

Within the group, we are all driven by the same passion: to combine the best of people and technology and to mobilize the best know-how to provide a sustainable solution that is perfectly tailored to our customers' needs. As security specialists, we have an in-depth knowledge and understanding of the challenges of our business. We are committed to regularly training our teams and to supporting our clients' security strategy and systems with high standards and responsiveness.

#### **AGILITY: ACTING WITH FLEXIBILITY AND RESPONSIVENESS**

Because the unexpected is at the heart of our business, our collective success is based on the conviction, support and mobilization of everyone. Our ability to adapt to change to market expectations and to the specific needs of our clients depends on the agility of each of our employees.

This agility, which translates into a decentralized organization guaranteeing flawless execution, is above all a state of mind and a daily line of conduct.

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### **AUTHENTICITY: NOTHING MATTERS MORE THAN TRUST!**

Authenticity is rooted in our history, our identity and our corporate culture. It shapes the way we act, based on respect, integrity, transparency and fairness. Key to maintaining the trust of all our stakeholders, it is a core value based on an ethical and irreproachable approach to our business.

### **TEAM SPIRIT: USING INDIVIDUAL TALENT TO ENHANCE COLLECTIVE PERFORMANCE**

Our business requires constant interaction and teamwork. Our strength lies in the diversity and complementarity of our talents. Collaboration, proximity and team spirit allow for a real synergy of skills and personalized and adapted support for our clients.

We are committed to maintaining and fostering this team spirit with all our stakeholders. This translates into absolute confidence in all our teams on a daily basis, particularly in the field, and direct and transparent communication with our clients and employees.

## Environmental:

In line with global conventions and our commitment to sustainability, SERIS holds itself and its stakeholders to high standards, expecting them to adopt practices that minimize their environmental footprint, conserve natural resources, and integrate eco-friendly technologies into their operations.

1. **Ambitious GHG Emission Reduction Targets:** It is imperative that SERIS set ambitious goals for reducing greenhouse gas emissions, ensuring transparent reporting mechanisms to track progress. By aligning with international climate agreements, we collectively work towards a sustainable future.
2. **Embracing Energy Efficiency and Renewable Energy:** Prioritizing energy efficiency is paramount. SERIS and its stakeholders must actively seek to minimize energy consumption, lower greenhouse gas emissions, and transition towards renewable energy sources wherever possible. This not only reduces our environmental impact but also supports global efforts to combat climate change.
3. **Responsible resources management:** SERIS and its partners should adopt a responsible and sustainable management of natural resources across all areas of our business. They should minimize the environmental impact of resource use while maximizing efficiency and supporting long-term ecological balance. To achieve this, they are required to :
  - **Efficient Resource Use:** SERIS and its stakeholders must minimize the use of natural resources, including energy, water, raw materials, and land, by adopting more efficient practices, technologies, and processes. This includes reducing consumption, optimizing production methods, and promoting the use of renewable resources.

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- Reuse, recycling & circular Economy: SERIS and its stakeholders must set up a transition towards a circular economy by promoting resource recovery, reuse, recycling and reducing waste. They should extend the lifecycle of materials and products wherever possible.
  - Monitoring and Reporting: SERIS and its stakeholders are also requested to monitor and evaluate regularly the use of resources to ensure progress towards sustainability goals. Transparent reporting on resource consumption, waste generation, and overall sustainability performance should be provided for internal and external communication.
4. **Air quality:** SERIS and its partners are encouraged to protect and improve air quality as a key component of the environmental responsibility. They should recognize the impact that air emissions, including greenhouse gases and other pollutants can have on public health, ecosystems and climate change. Therefore, they will be encouraged to minimize air pollution generated by the operations through the adoption of cleaner technologies and to reduce emissions from energy use and transportation. SERIS and its stakeholders are also requested to comply with all applicable air quality regulations and strive to exceed these standards by setting ambitious targets for reducing carbon emissions and other harmful pollutants.
  5. **Responsible Waste Management:** SERIS expects itself and its stakeholders to adopt responsible waste management practices, including waste reduction, recycling, and proper disposal methods. Through these efforts, we aim to minimize environmental harm and embrace the principles of a circular economy. We aim to send as few as possible to landfill and incineration.
  6. **Promoting Sustainable Transportation:** Encouraging sustainable transportation practices is key. SERIS and its business partners must consider initiatives such as utilizing electric vehicles, optimizing logistics routes, and supporting public transportation options to reduce carbon emissions associated with transportation activities. With the latest SERIS car-policy update we commit to 100% electric vehicles for our company cars.
  7. **Conserving Water Resources:** Water conservation is critical for sustainability. SERIS and its stakeholders must implement water-saving technologies, manage water usage efficiently, and minimize water waste to safeguard this precious resource for current and future generations.
  8. **Managing Supply Chains Sustainably:** SERIS requires itself and its stakeholders to assess and mitigate environmental and social risks throughout their supply chains. This includes sourcing sustainable materials, reducing transportation emissions, and promoting environmentally friendly packaging and logistics solutions.
  9. **Responsible Chemical Management:** Chemical management is a priority. SERIS and its employees must handle chemicals responsibly throughout their operations, from procurement to disposal, to minimize risks to human health and the environment, while ensuring compliance with relevant regulations and standards.

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10. **Preventing Pollution in all Forms:** SERIS must implement measures to prevent and reduce pollution, including air, water, and soil contamination, through the adoption of clean technologies and efficient resource management practices.
11. **Preserving Biodiversity and Ecosystems:** Protecting biodiversity and ecosystems is essential. SERIS and its stakeholders are encouraged to implement measures to mitigate habitat destruction, conserve ecosystems, and promote sustainable land use practices.
12. **Driving Environmental Innovation:** SERIS champions innovation in green technologies and urges itself and its stakeholders to invest in research and development of sustainable solutions. By fostering a culture of continuous improvement, we can address environmental challenges effectively.
13. **Noise emissions:** SERIS and its stakeholders are required to minimize noise emissions from the operations to protect the well-being of the employees, surrounding communities and local ecosystems. Excessive noise can have adverse effects on human health and wildlife, and SERIS and its stakeholders should take responsibility for managing noise levels generated by the activities. They should also comply with all relevant noise regulations and standards and should regularly monitor noise levels to minimize disturbances. Through continuous improvement, they should limit the impact of noise pollution and foster a quieter more sustainable environment for all stakeholders.
14. **Conducting Environmental Impact Assessments:** Before undertaking new projects or activities, SERIS conducts environmental impact assessments where this is applicable. This ensures the identification of potential risks and the development of effective mitigation strategies to minimize adverse environmental effects.
15. **Striving for Carbon Neutrality:** Our goal is carbon neutrality across all operations. SERIS sets ambitious targets for reducing carbon emissions, if necessary implement carbon offsetting measures, and transition to low-carbon alternatives to mitigate the impact of climate change.
16. **Promoting Environmental Education and Awareness:** SERIS advocates for environmental education, training, and awareness-raising initiatives within its partner network. By fostering a culture of environmental awareness and responsibility, we empower stakeholders to make informed decisions that contribute to our sustainability goals.

### Social:

SERIS emphasizes social responsibility, requiring to uphold fair labour practices, commit to diversity and Non-Discrimination, ensuring all possible health and safety precautions for all their internal and external stakeholders.

17. **Human Rights and Non-Discrimination:** SERIS expects adherence to high human rights standards, prohibiting discrimination and fostering inclusive workplaces that respect the rights of all individuals.

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18. **Labor Rights and Freedom of Association:** SERIS mandates the protection of workers' rights, ensuring freedom of association and constructive dialogue between management, employees and their representatives, to improve labour conditions and foster a harmonious work environment.
19. **Rights of Minorities and Indigenous People:** SERIS and its partners should uphold and promote the rights of minorities and Indigenous peoples in all areas of business operations. They should recognize the unique social, cultural, and environmental challenges these communities face and strive to ensure their inclusion, respect and dignity at all times.
20. **Working Conditions, Hours, and Remuneration:** SERIS ensures safe working conditions, compliance with legal working hour regulations, and fair remuneration for employees, fostering a supportive environment conducive to professional growth, well-being and development.
21. **Forced Labor and Human Trafficking:** SERIS strictly prohibits all forms of forced labour and human trafficking, promoting transparent recruitment practices and providing access to grievance mechanisms to safeguard workers' rights and dignity.
22. **Harassment and Non-Discrimination:** SERIS fosters harassment-free workplaces, prohibiting all forms of discriminatory behaviour and ensuring equal opportunities for all employees regardless of their background or characteristics.
23. **Diversity, Equity, and Inclusion:** SERIS promotes diversity, equity, and inclusion, valuing differences and providing equal opportunities for employment, advancement, and professional development based on merit.
24. **Health & Safety and Personal Protection:** SERIS prioritizes the health, safety, and well-being of its employees, providing robust health and safety policies, procedures, and training programs, along with access to personal protective equipment to prevent accidents and injuries.
25. **Supply Chain Responsibility and Diversity:** SERIS promotes responsible sourcing practices and supplier diversity, ensuring ethical business conduct and economic empowerment within its supply chain.
26. **Human & Labor Rights Training:** SERIS educates stakeholders on human and labour rights standards, empowering them to uphold these principles and prevent violations in the workplace.
27. **Child Labor Prevention and Young Workers:** SERIS prohibits child labour, ensuring that young workers of legal working age receive special protections and appropriate working conditions while prioritizing their safety, well-being, and educational needs, including the supply chain.
28. **Local Community Engagement and Impact:** SERIS encourages meaningful engagement with local communities, addressing their needs and concerns, and contributing to sustainable development initiatives that benefit all stakeholders.
29. **Use of private or public security forces:** SERIS and its partners should maintain a safe and secure environment where they operate. They should be committed to ensuring that the use of security forces—whether private or public—aligns with the highest standards of human rights and great

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sense of ethics. They should also commit to use security forces responsibly, ensure that their presence and actions align with our broader commitment to protecting human rights and maintain peace and fostering trust with the communities in which they operate.

30. **Animal Welfare:** SERIS upholds high standards of animal welfare, ensuring that all activities involving animals are conducted with their well-being, health, and humane treatment in mind, in compliance with relevant laws and regulations.
31. **Employee Well-being:** SERIS prioritizes employee well-being by providing access to healthcare, mental health support, work-life balance initiatives, and opportunities for professional development, fostering a positive and supportive work environment.
32. **Land, forest and water rights and forced eviction:** SERIS and its partners should respect and protect the rights of communities to land, forests and water resources. Their operations should prioritize sustainable and responsible use of these natural resources, ensuring that they benefit both current and future generations. They should explicitly reject any practices that lead to forced evictions or the displacement of communities.
33. **Stakeholder Engagement and Communication:** SERIS encourages transparent engagement and communication with stakeholders to build trust, address concerns, and collaborate on social responsibility initiatives, fostering a culture of openness and accountability.

### Governance:

SERIS promotes strong corporate governance principles among itself and all its stakeholders, including supply chain, emphasizing ethical conduct, transparency, and adherence to the rule of law.

34. **Ethical Business Conduct:** SERIS expects itself and its stakeholders to uphold the highest standards of ethical conduct, integrity, and transparency, avoiding conflicts of interest, corruption, and bribery to maintain trust and integrity.
35. **Anti-Corruption, Bribery, and Extortion:** SERIS requires policies to prevent corruption and bribery, promoting integrity and ethical behaviour within organizations while avoiding any impression of corruption.
36. **Anti-Corruption and Bribery Training:** SERIS provides education on business ethics and corporate governance to ensure that stakeholders understand their ethical responsibilities and legal obligations.
37. **Fair Competition, Anti-trust:** SERIS requires adherence to principles of fair competition, avoiding anti-competitive practices and maintaining compliance with antitrust laws to ensure a level playing field in the marketplace.
38. **Conflict of Interest and Business Gifts:** SERIS management, SERIS employees and business partners must avoid any activity that leads to, or may lead to, a conflict of interest. They will not use their positions to obtain direct or indirect personal benefits. They shall exercise fair, objective and

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impartial judgement in all business dealings, placing the interests of SERIS over any personal interests in matters relating to the business. Conflicts of interest include, but are not limited to, acceptance and giving of personal gifts or hospitality to or from business partners, other than gifts of modest nominal value or reasonable hospitality given in the ordinary course of business ( e.g. at New Year, religious celebrations, festivals, etc.) SERIS and business partners must manage conflicts of interest effectively, disclosing conflicts of interest promptly and transparently, and implementing measures to mitigate potential conflicts that may compromise objectivity, integrity, or impartiality in decision-making.

39. **Whistleblower Protection:** SERIS has and mandates partners to establish whistleblower protection mechanisms to encourage reporting of misconduct, fraud, and unethical behaviour, ensuring confidentiality and protection from retaliation.
40. **Ethical and Equal Treatment of SMEs and Payment Conditions:** SERIS emphasizes fair and equitable treatment of business partners and more particularly SMEs and by its partners. Discrimination based on company size is unacceptable. SERIS and partners must ensure transparent and non-discriminatory practices in supplier selection and establish fair payment terms. Timely and consistent payments to suppliers, irrespective of their size, are paramount to fostering trust and mutual respect. SERIS expects and promotes to its business partners to prioritize integrity and ethical conduct in all business interactions, promoting a same level playing field for both big companies and SMEs.
41. **Intellectual Property, Data Privacy, and Data Security:** SERIS requires its employees and business partners to safeguard personal and sensitive data, implementing robust data protection measures to prevent unauthorized access or disclosure of confidential information.
42. **Corporate Transparency:** SERIS fosters for itself and business partners, transparency in governance structures and financial reporting, providing accurate information to stakeholders and regulators to enhance accountability and trust.
43. **Legal Compliance:** SERIS complies and expects partners to comply with all applicable laws and regulations, ensuring legal compliance in their business activities.
44. **Export Controls and Economic Sanctions:** SERIS is committed to full compliance with all applicable export control and economic sanctions laws. More concretely, employees must ensure that all exports and transfers of goods and services, comply with the European Union Regulation and any other national export control laws relevant to our operations. Furthermore, SERIS strictly forbids any business transactions or dealings with individuals, entities, or countries listed under sanctions imposed by the European Union, the United Nations or the U.S. Office of Foreign Assets Control (OFAC). The same requirement is imposed to all its partners.
45. **Risk Management and Business Continuity:** SERIS implements and expects partners to conduct thorough risk assessments and implement effective risk management strategies to safeguard against operational, financial, and reputational risks.

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46. **Board Independence:** SERIS encourages partners to ensure board independence and diversity to provide effective oversight and strategic guidance.
47. **Shareholder Rights:** SERIS respects and requires business partners to respect and protect shareholder rights, including the right to participate in decision-making and receive timely information.
48. **Business Ethics Training:** SERIS provides education on business ethics and corporate governance to ensure their management and employees to understand their ethical responsibilities.
49. **Stakeholder Engagement:** SERIS fosters to engage with stakeholders, including shareholders, employees, customers, suppliers, regulators, and communities, to build trusting relationships, address stakeholder concerns, and enhance corporate governance effectiveness.
50. **Conflict Minerals:** SERIS expects partners to support efforts to reduce and eliminate the use of conflict minerals, complying with all relevant laws and regulations and establishing their own conflict minerals policies and due diligence.

### *Whistleblower Procedure*

With our whistleblower procedure we encourage all internal stakeholders and external business partners to report any concerns or complaints without fear of retaliation. This process is designed to uphold transparency and integrity within our operations. For all your concerns, complaints you can contact [ETHICS@seris.com](mailto:ETHICS@seris.com).

In the event that an individual who has reported a concern under the whistleblower process is not satisfied with the outcome or resolution, the following appeal procedure shall apply:

#### 1. **Right to Appeal**

The whistleblower shall have the right to appeal any decision or action taken in response to their report if they believe:

- The investigation was not conducted in accordance with the company's policies and procedures.
- Key evidence was overlooked or improperly considered.
- The outcome or resolution is inconsistent with the company's ESG commitments, including but not limited to ethical, social, or environmental standards.

#### 2. **Filing an Appeal**

To initiate an appeal, the whistleblower must submit a formal written appeal on the mail address [ETHICS@seris.com](mailto:ETHICS@seris.com) within 30 days of receiving the decision or outcome of the investigation. The appeal should clearly outline the grounds for appeal and provide any supporting evidence or documentation.

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### **3. Review Process**

The appeal will be reviewed by an independent panel, which may include representatives from the legal, compliance, and ESG teams, who were not involved in the original investigation. The review will be conducted in a timely manner, typically within 60 days of receiving the appeal, to ensure a fair and thorough reassessment.

### **4. Final Decision**

Following the review, the panel will issue a final decision, either upholding the original decision, modifying it, or requesting further investigation. The whistleblower will be informed in writing of the final decision and the reasons supporting it. This decision shall be binding and final within the company's internal processes.

### **5. Confidentiality and Non-Retaliation**

The appeal process shall maintain the same confidentiality and non-retaliation protections as the initial whistleblower process. No individual shall face retaliation or adverse consequences for filing an appeal in good faith.

This clause ensures fairness and transparency in handling concerns, reinforcing our commitment to ethical governance, accountability, and environmental and social responsibility.