Code of ethics

The French version is the reference version in French-speaking countries.
The English version is the reference document in other countries.

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seris
SECURITY
People
and
Technology

SERIS commitment to ethics

SERIS' mission is fundamental: to protect people and property.

In order to fulfil its mission, it is essential that the SERIS Group enjoys the trust of its customers and all its partners at all times.

But trust is hard to get and easy to lose.

SERIS earns and maintains the trust of its stakeholders through its professionalism, of course, but also through its behaviour towards its employees, its compliance with laws and regulations, its loyalty in its relationships with its partners, its integrity, and its attention to the protection of human rights and the environment.
Ethics are a powerful driver of trust.

The values of SERIS are our DNA and the solid basis of our commitments, including in terms of Ethics:

- Expertise
- Agility
- Team spirit
- Respect

It is essential that each and every one of us fully embodies these founding values and respects all the principles set out in this Code of Ethics.

All managers have a decisive role to play: they must set an example by embodying the Group's values and ensuring that every employee behaves in accordance with the company's ethical commitments.

By strictly adhering to these principles, we are all working to enhance the Group's reputation and enable SERIS to capitalise on its reputation and remain a key player in the private security sector.

Our ambition is clear: to be a leader in sustainable development and compliance in the private security sector.

Our values form the foundation upon which the company was built and developed, and they still guide the way we work and interact with our customers, partners, and employees.
As a SERIS employee or partner, you have a responsibility to respect the company's ethical standards.

This Code is designed to support you in this process at every stage of your activities. It defines expected behaviours and provides a clear frame of reference for professional situations.

At SERIS, we believe in transparency and integrity. We are fully aware that any breach of this Code, in addition to the moral misconduct that it would constitute, could have serious consequences for the company's performance, finances, attractiveness, ability to retain its markets and win new ones, and could damage our image. This Code is designed to prevent such situations.

And if, despite our best efforts and vigilance, violations of current laws or internal policies occur, they must be reported immediately so that we can take corrective action.

At all times, ethics must be the driving force behind our performance, the compass for our individual and collective behaviour, and the cement for our long-term development.

As a SERIS employee or partner, you have a major role to play in building an ethical and sustainable future for our company and for society in general.

At all times, in the course of our professional activities, we must all rely on our four cardinal values and be experts, agile, united, and respectful of our ethical commitments.

We're counting on you!

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President of the Governance and Animation Board of GenTem

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Members of the Group Executive Committee

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It consists of three parts:

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General framework

1. General framework

1.1 Why a SERIS code of ethics?

At SERIS, we are making sure on acting ethically, with integrity and in compliance with the law.

The SERIS Code of Ethics (hereinafter the "Code") formalises our commitments. It is a fundamental policy of our company, serving as a reference for all our actions, whether individual or collective, in the day-to-day performance of our duties.

It embodies our determination to be an exemplary corporate citizen and a trusted partner for all our stakeholders, whether they be our employees, customers, shareholders or any other entity with which we interact.

We know that our ethical principles help to strengthen our brand image, preserve its value and promote the Group's long-term viability and sustainable development.

This Code is intended to provide you with valuable guidance on how to act ethically, with integrity and in accordance with our commitments. However, as it cannot foresee every situation that may arise in the course of your activities, it is up to you to exercise discernment and consciously adopt fair behaviour in line with our values.

In addition to the Code, more specific policies, charters and directives, for the Group and/or for the subsidiaries in the countries in which we operate, are also available to provide you with an even more detailed framework.

1.2 To whom does the SERIS code of ethics apply?

Like our founding values, this Code applies to all our employees.

Each SERIS employee, in any Group entity, must behave in an exemplary manner by demonstrating loyalty, ethics and honesty, by acting with integrity, by treating his or her (internal or external) interlocutors with respect and dignity, and by complying with our policies and the laws in force.

This requirement is particularly important in the private security sector, where the trust of our customers is essential.

Compliance with the Code is the responsibility of SERIS as a company, but also the collective responsibility of all its employees. In particular, it is the responsibility of managers and supervisors to disseminate the principles of this Code to their teams. Their role is to ensure that their teams are aware of the Code and other related policies, and to encourage them to turn to their line manager, as well as the departments of Human Resources or Legal & Compliance, if they have any questions. For their part, all employees must be aware of these rules, apply them and refer to the relevant documents in case of doubt. Everyone must understand the principles of the Code and comply with them.
We also expect all our business partners, including our suppliers and subcontractors, to adhere to the values and requirements of our Code.

1.3 What is the ethical value of our mission?

As security experts, we want to make our customers' world safer by offering them the best combination of people and technology.

Ensuring the safety of people and property contributes to everyone's protection, tranquillity, and well-being. It's what guides and gives meaning to everything we do. This is one of the pillars of our strategy, enabling us to generate value for ourselves and for our ecosystem.

This commitment from all of us gives us the means to guarantee sustainable and profitable growth for our company, to adapt to the rapid changes in the world around us and to strengthen our relations with all our stakeholders.

Our actions and our commitment are based on four fundamental values:

- Expertise
- Agility
- Team spirit
- Respect

These four values define who we are and guide our actions within an ethical framework, with "Respect" being the value that best illustrates our ethical commitment. Respect for our customers, respect for our employees, respect for the law, of course, but also respect for fundamental rights, equal opportunities, health, and the environment.

1.4 What is our ethical responsibility?

All companies have an important role to play in promoting and defending ethical behaviour in their ecosystem.

As the SERIS Group, our responsibility is to choose the right way in all our decisions and to enable each of our employees to do the same. The individual ethics of each of you in the performance of your duties are essential to the ethics of the Group as a whole.

It is our responsibility to establish clear ethical rules, to disseminate them throughout the Group, and to ensure that they are understood and respected. To achieve this, we are putting in place dedicated resources (documentation, awareness campaigns, training, etc.) and tools (whistleblowing system[1]).

Our legal, compliance and CSR managers are available in each country to provide you with any additional information you may require.

[1] See information on the whistleblowing system in section 3.2.

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What are our ethical commitments?

2. What are our ethical commitments?

Our ethical commitments can be broken down into three main areas:

- Respect for human rights, people and working conditions
- Professional integrity and legal compliance
- Social, environmental and digital responsibility

2.1 Respect for human rights, people and working conditions

As a services company, we employ over 25,000 people who are at the heart of our business. Our ethics put people first, and this is reflected in our fundamental commitment to our employees.

2.1.1 Human rights

Respect for human rights is an essential principle for SERIS and guides the way we do business every day. We are committed to supporting and respecting fundamental human rights, as set out in the United Nations Universal Declaration of Human Rights and the Guiding Principles on Business and Human Rights, including those contained in the International Bill of Rights. We recognise our responsibility to promote and apply these rights in our activities around the world.

As a signatory to the United Nations Global Compact, we fully embrace the United Nations Sustainable Development Goals (SDGs) and integrate these relevant SDGs into our strategy as well as our day-to-day operations.

As a company specialising in security, we are aware of the need to rigorously assess the risks of human rights violations associated with the services we provide (in particular, the Right to Freedom and Security and the Right to Privacy), as well as those provided by our partners, suppliers and subcontractors.

Three principles for respecting human rights

1/ Respect for human dignity: Never humiliate or treat a person in a degrading manner ;
2/ Respect for privacy: Do not monitor, search or record a person without legal justification;
3/ Proportionality in the use of force: Use force only as a last resort and in a manner strictly proportionate to the threat.

2.1.2 Combating child labour or forced labour

It goes without saying that we do not employ children and do not accept any form of child labour, forced or compulsory labour.

We also ensure that our business partners, in particular our suppliers and subcontractors, do not use child, forced or compulsory labour.

Three principles to combat child and forced labour

1/ Require your suppliers and subcontractors to comply with the minimum legal age;
2/ Ensure that work is freely consented to: Your partners must guarantee that all their employees are employed voluntarily, without threat, coercion, debt, or withholding of personal documents;
3/ Setting up warning mechanisms: Not turning a blind eye and helping to detect and prevent fundamental rights violations, including among our subcontractors and partners.

For more information on relations with suppliers, please consult the Charters and Policies implemented in the various countries.

2.1.3 Working conditions and remuneration

We recognise the importance of ensuring fair wages, reasonable working hours and appropriate benefits.

We are committed to ensuring that wages and benefits meet or exceed national legal requirements or minimum standards in the private security sector. Remuneration must be paid regularly and on time.

Even though our profession binds us to our customers, for whom security is, by its very nature, a particularly sensitive matter, we believe that working hours and other conditions of employment must comply with applicable legislation and the standards of the private security market.

We also ensure that all information relating to pay, benefits and other aspects of working conditions is clearly communicated to every employee.

Three principles for fair working conditions and pay

1/ Respect working hours and rest periods: Do not agree to work longer than the maximum authorised working hours without compensation, and ensure you take the breaks and rest periods provided for by law ;
2/ Ensure that remuneration is in line with statutory or collective bargaining pay scales ;
3/ Refuse undeclared or irregular work: Do not work without a contract or payslip and report any suspicious situation.

For more information on working conditions and remuneration, please consult the onboarding documents for employees in the various countries.

2.1.4 Freedom of association

We guarantee that every employee can set up and join the union of their choice, in compliance with the laws and regulations in force.

We also recognise and respect the right of every employee to decide freely whether or not to be represented by a trade union in collective bargaining.

This includes respect for the right to freedom of assembly and peaceful association. No employee should be exposed to the risk of harassment as a result of exercising these rights.

Three principles to defend freedom of association

1/ Respect everyone's right to join a trade union: Do not exert pressure to prevent an employee from joining any trade union ;
2/ Do not discriminate against a colleague because of their trade union involvement ;
3/ Respect the right to information and freedom of association: Provide access to union information (posters, meetings) within the limits set by law and safety regulations.

2.1.5 Health and safety at work

We attach the utmost importance to providing a safe and healthy working environment for all our employees. We are committed to taking all reasonable steps to prevent accidents and injuries, while actively supporting all initiatives to promote health and well-being at work.

With this in mind, risk assessments must be carried out to identify and circumscribe potential safety hazards. Moreover, every employee must receive appropriate training, clear instructions, and the suitable equipment for the tasks they are required to perform.

Our commitment encompasses not only the protection of our employees' physical health but also their mental well-being.

Three principles to ensure health and safety at work:

1/ Comply with safety instructions and wear protective equipment ;
2/ Immediately report any danger or abnormal situation: Inform superiors in the event of faulty equipment, a dangerous post, an attack or an incident ;
3/ Maintain physical and mental balance: Observe rest periods, avoid bouts of fatigue, ask for help or support in the event of stress, violence, or difficulties on site.

For more information on health and safety at work, we invite you to consult the documents drawn up in each country on these subjects.

2.1.6 Abuse of alcohol and/or drugs

We attach great importance to all our employees being "fit for work}" and free from any adverse effects due to the consumption of alcohol or drugs at work, both for the quality of our services and for their health and safety.

We are working to establish an alcohol- and drug-free workplace.

Three principles to prevent the use of drugs or alcohol in the workplace

1/ Never consume alcohol or drugs in the workplace: The use of any substance that alters physical or mental capacity is strictly prohibited during working hours ;
2/ Report to work in full command of your faculties: No state of intoxication or residual effects of narcotics ;
3/ Report any risky behaviour: Alert a manager if a colleague appears to be under the influence of alcohol or drugs, in a spirit of collective protection.

2.1.7 Diversity and equal opportunities

We promote an inclusive and respectful working environment, guaranteeing equal opportunities and team diversity.

It is our duty as an employer to guarantee equal opportunities for all our employees.

Furthermore, at SERIS, every individual must be treated fairly and equitably, without being exposed to any form of discrimination. We are convinced that diversity and inclusion are essential pillars of innovation and creativity. The richness and diversity of our teams are a major asset that contributes to our success and fosters long-term sustainable growth.

In our company, it is the responsibility of everyone, and in particular managers at all levels, to ensure that we create a working environment where everyone feels fully involved and recognised for their achievements. This environment must be based on mutual support and collaboration, not competition between employees.

We do not tolerate any form of discrimination, whether it concerns recruitment, training, career development, termination of contract or retirement, when it is motivated by criteria such as ethnic or geographical origin, religion, gender, sexual orientation, family or parental status, disability or any other characteristic protected by the legislation in force.

We ensure that recruitment decisions are based exclusively on objective criteria, i.e. the candidate's professional experience, behavioural skills, performance and proven potential in relation to the requirements of the position to be filled.

Three principles to promote diversity and respect equal opportunities

1/ Treat everyone with respect and without discrimination: Never judge, exclude or mistreat anyone on the basis of their origin, gender, religion, sexual orientation, disability or appearance;
2/ Promote team spirit, regardless of the differences Work professionally with all colleagues, without prejudice or stereotypes.
3/ Report any discriminatory behaviour or harassment: Alert in the event of unfair comments, gestures or decisions towards a person.

For more information, please consult the diversity and inclusion policies for each country.

2.1.8 Harassment

We advocate a zero-tolerance policy towards intimidating behaviour, discrimination or harassment in any form, whether sexual, verbal, physical or psychological.

All employees must be treated with dignity and respect and adopt the same attitude towards their colleagues. At SERIS, we are making sure to foster a calm and productive working environment. This is why any form of intimidation, harassment, threat or reprisal is strictly prohibited.

Three principles to combat all types of harassment

1/ Behave in a respectful manner in all circumstances: Avoid inappropriate remarks, unwanted insistence, mockery, intimidation or humiliating behaviour towards a colleague ;
2/ Refuse to take part in harassing comments or acts : Do not encourage, relay or trivialise inappropriate attitudes, even in jest ;
3/ Report any suspicious situation or harassment immediately: Immediately alert your manager or a designated contact person, or submit a report via the whistleblowing platform, to protect victims and prevent escalation.

2.2 Professional integrity and legal compliance

We place honesty, integrity, and fairness at the heart of our activities, affirming our strong commitment to respecting and promoting the highest standards of business ethics throughout our operations.

As a major player in the security sector, we have a major responsibility in all the countries in which the company operates. Each and every one of us must do our part to ensure that SERIS is a model corporate citizen, scrupulously ensuring that its actions comply with current legislation and regulations.

We are also actively involved in the evolution and development of the private security market. By working with professional organisations, trade unions, public authorities and law enforcement agencies, we are helping to improve services and structure the market. Our aim is to raise quality standards in the sector.

2.2.1 Compliance with laws and regulations

SERIS is an international company. All our employees and business partners are required to comply at all times with the laws and regulations in force in the countries where we operate.

This Code constitutes a fundamental and general reference for the delivery of our services. It must be applied to all our activities, even when its requirements exceed those of local legislation.

Three principles to comply with laws and regulations

1/ Know and comply with the applicable professional rules: Act in compliance with current legislation and with the specific regulations of the private security sector ;
2/ Refuse any illegal mission or action: Never accept a task or order that goes against the law ;
3/ Behave honestly and transparently: Demonstrate loyalty and report any irregularities so that they can be remedied immediately.

2.2.2 Fair competition

We firmly defend the principles of fair trade and fair competition, based on the integrity of commercial relations, fair prices and excellent customer service.

As a SERIS representative, you may be asked to take part in trade association meetings in order to contribute to the progress of the sector. In this case, it is particularly important to remind you that it is strictly forbidden to exchange information or enter into agreements with competitors relating to prices (past, present or future), the allocation of market shares or any other illegal practice.

We hereby reaffirm our unwavering commitment to strict compliance with the laws and regulations governing fair competition, thereby guaranteeing ethical and transparent business practices.

Three principles to avoid behaviour contrary to the rules of fair competition

1/ Do not divulge confidential information: Respect the confidentiality of internal, customer and partner information, even after leaving the company;
2/ Comply with the bidding and contract awarding rules: Do not seek to influence, manipulate or circumvent the selection procedures for service providers;
3 Never denigrate a competitor or disseminate false information : Refrain from unfairly criticising another company or its agents, whether to customers, the public or on social networks.

For more information, please consult the **SERIS Group Competition Guide.**

2.2.3 Fight against corruption

We are committed to an active anti-corruption policy and have set up and implemented a Group-wide programme for the prevention, detection and remediation of corruption risks.

We firmly and absolutely prohibit bribes, illicit favours and any other practice contrary to integrity, and we have strict procedures to ensure compliance with international legislation.

We are committed to providing the highest quality services to meet the specific expectations of our customers, and in return we expect to be selected as partners solely on the basis of merit, in a framework of free and fair competition.

We are convinced that corruption undermines contractual agreements, distorts the rules of the market, and exposes our brand and reputation to considerable risks.

Three principles to combat the risk of corruption

1/ Report any attempt at corruption : Immediately inform superiors or use internal procedures if you witness or are the victim of an attempt at corruption ;
2/ Work with complete transparency and traceability : Document decisions so that they do not appear to have been taken in an opaque manner or without justification ;
3/ Comply with authorisation procedures: Never circumvent internal rules or shortcut approval processes to achieve a quicker result or to favour someone.

For more information, please consult
the **SERIS Group Anti-Corruption Code of Conduct.**

2.2.4 Invitations, gifts and other benefits

We must at all times maintain and project an image of professionalism and independence in our relations with our business partners. This is why all our buying and selling operations must be conducted with exemplary integrity.

Our employees and business partners must neither offer nor accept gifts, services or invitations that could influence (or even suggest a possible influence on) a business transaction or alter the decision-making process of an employee, business partner or customer.

Three principles for complying with the rules on gifts and invitations

1/ Never solicit gifts or invitations: Do not ask or put pressure on a customer, supplier or partner to obtain a personal advantage;
2/ Only accept a gift or invitation if it is symbolic and complies with the company rules: Refuse all gifts and invitations whose value could influence a decision and check the limits set by internal policies;
3/ Declare any gifts or invitations received : To ensure transparency, report any benefits received or offered, however modest, to your superiors or the relevant department.

For more information, please consult
the **SERIS Group Anti-Corruption Code of Conduct**
and the Gift and Invitation Policies drawn up in each country.

2.2.5 Money laundering and terrorist financing

Under no circumstances may we contribute, directly or indirectly, to money laundering or the financing of terrorism. We do our utmost to scrupulously respect all the general principles in force relating to the fight against these illicit practices. These principles are established by conventions and legislation on corruption, money laundering and the financing of terrorism, and we undertake to apply them strictly, in accordance with the spirit of this Code.

Three principles to combat money laundering and terrorist financing

1/ Check the identity of partners thoroughly: Always ensure that partners are clearly identified and that their activity is legitimate before making a payment;
2/ Report any suspicious transactions or behaviour: Alert your line manager or contact person if you have any doubts about a cash payment or any other suspicious request;
3/ Refuse any questionable or unjustified assignment or transaction: Do not participate in any financial transaction or service whose origin or purpose appears suspicious.

2.2.6 Conflicts of interest

The commercial decisions we take, at all levels of the company, must always be based on objective and rational criteria. They must not under any circumstances be influenced by personal relationships, activities outside SERIS, or the interests of individual employees.

The existence of conflicts of interest within the company affects the quality of our decisions, damages our brand and reputation, and creates a climate of mistrust both within the company and towards our external partners.

Conflicts of interest must therefore be declared internally and the employee concerned must refrain from taking part in, or influencing, any decision that could be affected by a conflict of interest.

Three principles for avoiding conflict-of-interest situations

1/ Clearly separate personal and professional interests: Do not use your position to favour a relative, a friend company, or your own personal interests;
2/ Declare any situation that could create a conflict of interest: Inform your superiors if you are going to be working with a member of your family, a former employer or any person with whom you have a personal relationship ;
3/ Refuse any assignment that would call impartiality into question: Do not accept an assignment if you cannot carry it out neutrally and impartially.

For more information, please consult
the **SERIS Group Anti-Corruption Code of Conduct.**

2.2.7 Fraud

We ensure that any fraud or attempted fraud is banned within the SERIS Group.

Fraud occurs when an employee deliberately attempts to deceive another person or entity, or abuses his or her position for personal gain or to benefit another person. Examples of fraud include the falsification or manipulation of financial statements and accounts, the intentional alteration or omission of financial transactions, and the unauthorised use of SERIS resources.

Fraud is considered a criminal offence and is punishable in most countries.

It is the responsibility of each Country Chairman, Regional Director and Head of Department, or equivalent function, to implement and maintain appropriate internal controls to prevent and detect fraud.

Three principles to combat fraud

1/ Be honest in your professional actions and statements: Never falsify reports, timesheets, expense reports, accounting documents, etc;
2/ Respect internal procedures without trying to circumvent them: Follow the accounting rules, scoring rules and expense tracking rules;
3/ Report any fraudulent situation or behaviour: Alert in the event of detected or suspected fraud (false service, misappropriation of funds or equipment, etc.).

2.2.8 Political contributions, political activities and lobbying

We do not make any resources (financial or otherwise) or services available to government bodies, political organisations, parties or candidates. Any departure from this rule requires the prior approval of the Chairman of the Group and the Chairman of Comex.

On the other hand, we ensure that employees have the freedom to become involved in lawful political activities, in their personal capacity and in their free time, as citizens, without these personal commitments giving rise to any discrimination whatsoever within the Group.

Where lobbying is involved, we ensure that it is closely supervised and monitored. Lobbying consists of legally transmitting information or opinions to official representatives, such as legislators or regulatory agencies, in order to influence their actions, policies or decisions. This is a strictly regulated activity in some countries.

Only employees who have been expressly authorised may lobby on behalf of SERIS. These activities must be in line with the company's interests and scrupulously comply with all applicable laws and regulations. Any lobbying must be carried out with honesty and integrity and in compliance with the established rules.

Three principles to avoid political contributions and ensure that lobbying always complies with regulations

1/ Do not use company resources for political purposes: Do not use company time, premises, vehicles, equipment, or company funds to support a party, candidate, or political activity;
2/ Carry out all lobbying activities in a transparent and controlled manner: lobbying may only be carried out by authorised persons, in compliance with the law and official registers;
3/ Declare any personal political involvement where there is a risk of conflict of interest: Inform management if your political involvement may interfere with your duties.

2.2.9 Services for the government

Some of our customers include government agencies, authorities, and public international bodies or agencies. We pay particular attention to compliance with all applicable laws and regulations in the context of our collaboration with governments and public authorities.

Three principles for securing interactions with government entities

1/ Act transparently and loyally in all dealings with the authorities: Communications with representatives of the State or other public authorities must be clear, factual and verifiable;
2/ Comply with authorisation procedures and levels : Only authorised employees may officially represent the company in dealings with the authorities and agencies;
3/ Never seek to influence a public decision unlawfully: Prohibition of any attempt to exert pressure, gain undue advantage or use an undeclared intermediary to obtain a contract or favour.

2.2.10 Tax management

Our tax policy aims to ensure consistency with the long-term interests of all our stakeholders, including governments, shareholders, employees and communities.

We are responsible for legally paying the correct amount of tax due in relation to our activities and business models. We take care not to engage in tax management practices that could harm business operations, SERIS' reputation or the interests of our stakeholders.

We are committed to honouring our tax obligations by paying applicable taxes on time, ensuring the accuracy of our tax returns and submitting them on time.

Three principles for ethical and sustainable corporate tax management

1/ Scrupulously comply with tax obligations in each country of operation: Declare and pay taxes and social security contributions on time, in accordance with local legislation;
2/ Refuse any aggressive or artificial tax optimisation practices: Do not use complex arrangements or schemes designed solely to avoid tax without any real economic basis;
3/ Ensure the transparency of financial and tax information: Produce reliable accounts that are accessible to the tax authorities, and cooperate fully in the event of an audit.

2.2.11 Transparency and governance

We attach great importance to transparent communication with all the stakeholders involved in our activities. This includes our employees, business partners, customers, shareholders and public authorities. It is imperative that we act and express ourselves in a way that reflects our core values and builds trust in our brand.

We ensure that the governance of our Group is clear, effective and contributes to the ethical operation of our business.

We establish clear internal procedures to ensure effective control and to make fair and equitable decisions. In terms of transparency and governance, it is the responsibility of GenTem's Governance and Management Council and Executive Committee to ensure that ethical standards are applied.

Three principles to ensure transparent and exemplary governance

1/ Provide truthful and accurate information: The information provided must be honest, complete and verifiable, whatever the level of responsibility;
2/ Explain the decisions: Every important decision must be justified, understandable and shared with the parties concerned;
3/ Report clearly: Everyone, at their own level, must be able to justify their actions and results in a clear, traceable and responsible way.

2.2.12 Reporting and documentation

With regard to our financial information, we ensure that all our reports and accounting documents honestly and explicitly reflect the true nature of our business transactions, as well as the assets and liabilities of our Group, in strict compliance with applicable regulatory, accounting, and legal requirements.

More generally, we take steps to ensure that the corporate information we provide to interested parties is complete, accurate and relevant and does not mislead or deceive them.

Three principles to guarantee the reliability of corporate documentation

1/ Provide complete, accurate and verifiable information: Never falsify, omit or alter data in reports, communications or other official documents;
2/ Comply with accounting standards and internal control procedures: Scrupulously follow the management, traceability and validation rules applicable to financial and operational data;
3/ Report any errors or irregularities found in the documents: Immediately notify management or the relevant department in the event of an anomaly, error, or suspected data manipulation.

2.3 Social, environmental and digital responsibility

2.3.1 Our suppliers

We work with a wide range of suppliers of products, services and information essential to our business. That's why it's so important for us to rigorously select the most competent service providers and to guarantee fair treatment for all of them.

All our suppliers and subcontractors must meet the requirements and standards we have set, particularly in terms of ethics and quality. They are also required to comply with all laws, rules and regulations applicable in each country in which we operate, including those relating to data protection.

Any form of remuneration paid or received in the context of relations with commercial partners must be based exclusively on the effective and verifiable supply or delivery of products and services.

As far as our suppliers are concerned, the selection, contracting, and control criteria may differ from one country to another, at the initiative of the Country Chairmen, but all must respect the principles outlined in this Code and the values we uphold.

Three principles to guarantee the quality and ethics of suppliers

1/ Select suppliers on the basis of clear, legal and ethical criteria: Verify in advance that suppliers comply with social, environmental, and tax legislation, as well as the principles of professional ethics;
2/ Include ethical and compliance clauses in contracts: Require written and contractual commitments on respect for human rights, legal employment, anti-corruption and regulatory compliance;
3/ Monitor, control and react in the event of non-compliance: Set up regular assessments and suspend or even terminate the contractual relationship in the event of serious breaches.

2.3.2 Confidential Information

We take care to protect our own confidential information and that to which we have access.

Our confidential information includes our trade secrets and any other protected data. It includes, among others, the company's strategic plans, financial data, and information relating to our customers. Any unauthorised disclosure or loss of this information could be detrimental to the company, damage our brand image and/or erode the trust of our stakeholders.

In the same way, we ensure that non-public information about our customers or business partners to which we have access in the course of our activities is preserved and secured. They must be protected in full compliance with all applicable legal and contractual requirements.

Three principles to protect confidential information

1/ Never disclose confidential information to unauthorised persons: Sensitive data may only be shared if strictly necessary and authorised;
2/ Use secure tools and media to process sensitive information: Implement restricted file access, strong passwords, data encryption, etc.;
3/ Respect internal instructions: Strictly apply the Group's confidentiality procedures, and alert the relevant team immediately in the event of a confidentiality breach (error, intrusion, etc.).

2.3.3 Protection of personal data

We recognise and respect the fundamental right of individuals to privacy.

We are committed to processing personal data responsibly, in compliance with current privacy and data protection regulations.

We define clear roles and responsibilities for the governance of the personal data we process and we ensure that we adhere to rigorous ethical principles in their management within SERIS.

Three principles to ensure the protection of personal data

1/ Only collect data that is strictly necessary: Limit the collection of personal information in accordance with the principle of minimisation;
2/ Protect access to and use of personal data: Use secure passwords; restrict access to data based on roles; prohibit any unauthorised transmission;
3/ Inform and respect the rights of the people concerned: Ensure that individuals are informed that their personal data is being collected and that they can exercise their rights (access, rectification, deletion).

2.3.4 Protection of SERIS assets and resources

We ensure that SERIS resources, whether tangible or intangible, are always used efficiently and sustainably.

Among these assets, the SERIS brand is a major intangible asset for our company. It embodies the value and history of our Group, which specialises in private security. It is therefore imperative for us to preserve our brand and our image, just as we scrupulously respect the brands and other intellectual property rights of third parties.

Computers and digital communication tools are essential material goods for the smooth running of a business. Their use must remain appropriate. In particular, it is strictly forbidden to use them for illegal activities, acts of harassment or any behaviour that may be deemed offensive or discriminatory.
As a general rule, the resources we make available to you for the performance of your duties at SERIS (company cars, premises, electronic means of communication, office supplies, etc.) are reserved for professional use, must be used responsibly and must not be wasted or abused under any circumstances. These resources must be protected and secured at all times to prevent any illicit use, misappropriation, damage, or destruction, whether resulting from an accident, a fraudulent act, or a breach of trust. Personal use of computers and mobile phones may be permitted, subject to compliance with applicable local policies.

Three principles to protect SERIS assets and resources

1/ Use company resources for business purposes only: Use uniform materials and equipment responsibly and for authorised missions;
2/ Protect equipment, premises and materials against loss or damage: Demonstrate vigilance by securing access and complying with maintenance and safety procedures;
3/ Report any fraudulent or improper use of company resources: Alert management or the relevant department immediately if there is any suspicion of theft, misappropriation or deliberate damage to assets and resources.

2.3.5 Social networks

We advocate responsible use of digital media in line with our values and commitments. This responsible use is based on respect for confidentiality, loyalty to the company and courtesy in exchanges.

We recognise and respect the fundamental right of every individual to freedom of expression and to freely communicate their opinions. This freedom of expression must, however, be exercised in accordance with the ethical values we uphold.

We strongly encourage our employees and business partners who interact with SERIS on social networks to behave in accordance with the company's values and policies.

Furthermore, while everyone is free to express themselves in accordance with the ethical principles of this Code, only those persons expressly designated by the company for this purpose are authorised to make public statements on behalf of SERIS.

All employees are encouraged to express themselves professionally, even on their personal accounts. Any publication, even a personal one, can have an impact on the company's image. It is essential to avoid disseminating confidential or sensitive information about SERIS, to respect others and to express yourself with discernment.

Three principles for responsible use of social networks

1/ Do not publish sensitive or confidential information: Never share internal, confidential or strategic company or customer information on social networks, or personal information about colleagues;
2/ Express yourself with respect and moderation, even in a personal capacity: Avoid any discriminatory, violent, polemical or offensive comments;
3/ Do not speak on behalf of the company without authorisation: Public statements about the company or the sector must be authorised in advance.

2.3.6 Artificial intelligence

We take a responsible approach to the use of artificial intelligence (AI). For SERIS employees, the use of AI in the workplace is based on the principles of transparency, respect for fundamental rights and the constant quest for fairness.

We are committed to training our employees in the use of AI in the workplace, with a view to updating everyone's knowledge and informing them about the risks and opportunities of this tool.

Our employees must use AI tools to support their work, without ever compromising data confidentiality or replacing critical human judgement. AI must be seen as a means of enhancing human skills, not replacing them, and its use must always respect the company's ethical values.

Algorithmic biases must be identified and corrected to ensure fairness for all individuals concerned. It is crucial to understand the limitations of the systems used and to avoid delegating sensitive decisions to them without supervision.

Training on the impact of AI, including on the environment, is also essential to ensure informed and conscious use.

Three principles for the responsible use of AI

1/ Use AI only within a legal, transparent and justified framework: Ensure that any use of AI complies with the laws in force, and in particular avoid incorporating personal data or sensitive or confidential information into a system using AI;
2/ Never use AI to monitor, discriminate or manipulate : Reject any use of AI for abusive control, unauthorised profiling or unfair decisions about individuals;
3/ Verify, manage and take responsibility for the results produced by AI: Rather than blindly trusting the results of an AI tool, adopt a critical stance, being prepared to correct or question these results, and taking human responsibility for decisions made with the assistance of AI.

2.3.7 Environmental commitment

We are committed to managing our business in a sustainable way, integrating respect for and consideration of the environment into all our processes. We have a responsibility to work towards a more sustainable future.

Our constant ambition must be to reduce or limit as far as possible the environmental impact of our operations, while actively exploring solutions to improve the environmental performance of our activities.

At SERIS, our environmental ambitions are defined at Group level but are implemented in each country, so that we can be as close as possible to the ground and choose appropriate actions.

We have an obligation to meet or exceed the environmental requirements set out in current legislation, applicable regulations and relevant international agreements.
In addition to our Group's commitments, at an individual level, we encourage all our employees to adopt environmentally friendly behaviour.

Three principles for embedding our actions in an approach to reduce our environmental impact.

1/ Reduce our energy and fuel consumption : Switch off unused equipment, use public transport and shared or optimised journeys, and when travelling by car, adopt an eco-friendly driving style;
2/ Comply with environmental instructions at each work site : Apply environmental rules according to locations and customers;
3/ Limit waste and promote sustainable supplies : Reduce printing on paper, avoid wasting materials, use reusable or low-impact products.

2.3.8 Sponsorship and patronage

Sponsorship and patronage initiatives must be integrated coherently with our other communication initiatives in order to promote the SERIS brand. Sponsorship and patronage must be rigorously structured and based on our values, our ethical principles and our brand identity.

The aim is for these sponsorship and patronage initiatives to help reinforce a positive image of our company, consolidate our brand awareness, and inspire legitimate pride among our employees in being part of the SERIS Group.

It is imperative that every action is in line with the principles set out in this Code.

There must be no consideration for these actions other than the reinforcement of the SERIS brand image, its reputation or its visibility.

These initiatives must be the subject of a written contract, validated by local legal experts and compliant with current legislation and applicable tax regulations. Any distortion of the purpose of a sponsorship or patronage contract is prohibited.

The SERIS Group ensures that local sponsorship and patronage initiatives are consistent.

Three principles to ensure that our sponsorship and patronage activities comply with ethical principles

1/ Ensure that the planned action has a clear, legitimate and professional objective: Sponsorship and patronage must never be used for personal advantage or disguised influence;
2/ Draft each contract in writing: It is essential to clearly identify the beneficiaries, the expected benefits and the monitoring procedures, particularly to ensure that there are no conflicts of interest;
3/ Monitor the actual implementation and use of funds: The actions set out in the contract must be carried out.

3

How do we meet our ethical commitments?

3. How do we meet our ethical commitments?

This Code is much more than a set of rules: it embodies our commitment to excellence, integrity and responsibility. Its daily application is essential to guarantee our credibility and ensure a sustainable future for our company.

3.1 Training and awareness-raising

Our commitment to awareness-raising and training is a fundamental pillar in guaranteeing the effectiveness and practical application of this Code.

It cannot be assumed that everyone understands ethical principles: this requires regular support tailored to the specific challenges of each profession and business context.

This is why we are deploying training and/or awareness-raising measures that are accessible to all employees, in different formats depending on the way they work (in particular, online training and awareness-raising initiatives are reserved for employees who have online communication tools provided by the company, whereas staff working on customer sites are more likely to be made aware of the issue during meetings with their managers or by posting notices.

Training and awareness programmes foster a shared culture of integrity, respect and responsibility.

This approach is not limited to simply passing on rules: it aims to develop everyone's ability to identify sensitive situations, ask the right questions and act consciously.

Ethics cut across all the themes addressed in this Code - whether it be the fight against corruption, respect for human rights, the defence of diversity or the duty of confidentiality - and their implementation depends on the active involvement of everyone.

Training is therefore a strategic lever for reinforcing vigilance, preventing abuses and embodying, on a daily basis, the values that we collectively defend.

3.2 Whistleblowing system

To ensure that the Group's ethical principles are respected and to enable everyone to express and defend our ethical values in the workplace, we have set up a platform for collecting and handling internal alerts. It is one of the key tools of our commitment.

We all have a duty to report any action or behaviour that is contrary to the values and commitments of SERIS. Regardless of the hierarchy or the context, no failure should be ignored.

You can report any violation:

- To your line manager;
- To all Human Resources Department managers;
- To all managers of the Legal and Compliance Department.

If you do not wish to (or are unable to) report any offences of which you are aware directly to the above-mentioned individuals, there are also other reporting channels available to you.

- To submit a report, use the SERISETHICS platform available at the following address: https://serisethics.integrityline.app/

Or

- By post addressed, in a confidential envelope, to the Group's Legal and Compliance Department, at the following address: 6 rue du Général de Larminat, 75015 Paris

All reports are treated in the strictest confidence and no reprisals will be tolerated against an employee who has made a report in good faith.

Any breaches identified must be rectified quickly. Depending on the seriousness of the offence, sanctions up to and including dismissal may be applied.

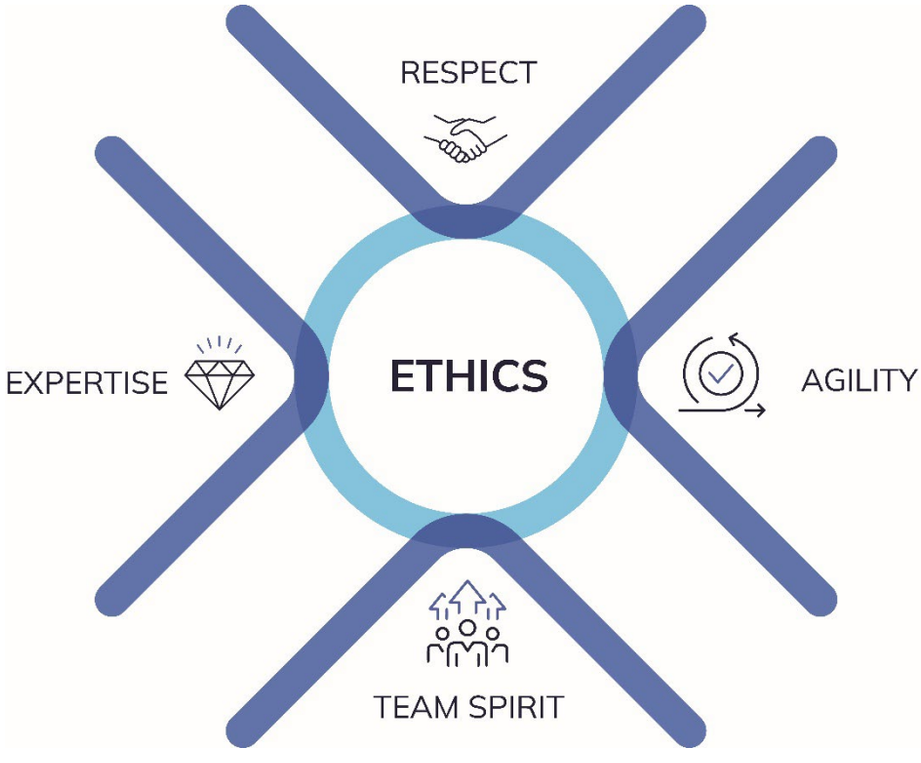
For more information on alerts, please consult
Seris Group Whistleblowing Policy.

3.3 Implementation

Each manager is responsible for ensuring that this Code is applied within his or her area of activity.
The Country Chairmen are also the ultimate guarantors of the correct application of the Code by all employees and business partners in their respective zones, with the support of the Compliance Officers.

It is essential that the Code be communicated and applied as far as possible to all established contractual relationships with our business partners.

Compliance with and application of the Code must be constantly monitored as part of our enterprise risk management process at Group and country level.



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