

Group Policy

Loomis

– Code of Conduct

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A message from our President & CEO



All year, day and night, Loomis works to ensure that the flow of payments in society are both efficient and safe, but also inclusive and open to all. Making people's everyday lives easier.

As a global player across many markets, Loomis has a great responsibility as a leading organization in our industry.

Because of these responsibilities, we continuously strive to form a strong corporate culture built on our core values: People, Service and Integrity.

The Code of Conduct drives our commitment to the **people** at Loomis, supporting our employees' development and how we treat each other. As a company, a responsible behavior in relation to our employees is not only important to us – it is a prerequisite for our existence.

When we commit to provide superior **service** that exceeds expectations and continuously innovate to simplify our customers' processes, we build a culture of trust with our customers and other stakeholders.

Our Code of Conduct also serves as a constant reminder that our commitment to **integrity** requires all of us to perform our jobs with honesty, vigilance and high ethics.

At Loomis, we are always here for our customers and each other. Our success depends on each of us accepting personal responsibility for doing the right thing and that we speak up if something doesn't seem right.

I am proud of our company and the role we play at the centre of the payment ecosystem.

Aritz Larrea

President & CEO

Contents

1. Loomis' commitment	4
2. About the Code	4
3. Our principles	5
3.1. Within the company.....	5
3.2. Outside the company	7
3.3. Compliance responsibilities.....	9
4. Ask questions	9
5. Speak up	9
6. Update and approval	10

1. Loomis' commitment

Loomis' business and workplace are based on trust. The trust we build with our customers, shareholders, suppliers, society, and other stakeholders as well as between ourselves as colleagues.

Loomis shall always comply with applicable laws and regulations, and respect internationally recognized standards on human rights, labour rights, environment and anti-corruption¹.

We shall also conduct all our business in accordance with this Code of Conduct (the “**Code**”) and the Group's other steering documents. Our commitment extends beyond legal compliance.

Loomis is committed to a zero vision on injuries and harm and shall actively work to build a company where inclusiveness, fairness and diversity is at the heart of our business – promoting a culture where everyone has a sense of belonging. We are committed to being a trusted partner and to uphold the highest standards of integrity and compliance throughout our own business as well as in our value chain.

We operate our business based on three core values, the “**Loomis Values**”:

- **People:** We are committed to developing quality people and treating everyone with respect
- **Service:** We strive to provide exceptional quality, innovation, and exceeding our customers' expectations
- **Integrity:** We perform with honesty, vigilance, and high ethics

2. About the Code

The purpose of the Code is to provide guidance for how to apply the Loomis Values in our daily work at Loomis and how to avoid unethical practices. Both within the company and in our dealings outside of the company.

The Code is divided into three dimensions:

- **Within the company:** Guidelines for ethical relationships at Loomis
- **Outside the company:** Guidelines for ethical relationships with external parties, customers, suppliers, governments, the general public, and other external stakeholders
- **Compliance responsibilities:** Allocating responsibility for the Code within Loomis

¹ Loomis is a signatory to the United Nations Global the following standards and has also undertaken the following standards, which are also reflected in this Code: UN Guiding Principles on Business and Human Rights, International Bill of Human Rights, including UN Universal Declaration of Human rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and subsequent core conventions and OECD's Guidelines for Multinational Enterprises.

The Code applies to all Loomis' employees, including part time employees, temporary staff, managers, and the members of Board of Directors of group entities (all referred to as “**employees**” in this Code). The Code also provides the framework on ethical standards for our consultants and other suppliers. For suppliers, Loomis has also adopted a separate Supplier Code of Conduct.

The Code has been adopted by the Board of Directors of Loomis AB (together with its subsidiaries referred to as the “**company**”, the “**Group**”, “**Loomis**” and “**we**”).

3. Our principles

3.1. Within the company

For the relationship between Loomis and its employees to produce the best results, expectations shall be clearly defined on both sides. Therefore, the Code sets out several commitments for all parties – Loomis' commitment to the employees as well as the employees' commitment to Loomis.

Loomis' commitment to employees

- Loomis shall offer a **healthy and safe working environment**, including providing a working environment dedicated to risk management that follows strict standards for safety and access to modern safety and security equipment and techniques. Loomis shall regularly offer safety and security training in the proper methods for managing risk, including training on anti-robbery techniques as well as policies and procedures that reduce the risk of injury, theft, loss and shortages.
- Loomis shall be a **fair employer**, where all employees are treated with respect and dignity. No form of discrimination, harassment or violence is tolerated, and no employee shall be subject to mistreatment based on race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, social origin, political or other opinion, trade union membership, genetic information, or any other characteristic protected by law.
- Loomis is an **equal opportunity employer** and considers **diversity and inclusion** to be both a way of working and a social obligation and is further crucial in order to build a organization and a culture that can meet our customers' future challenges. All employment decisions shall be made based on objective criteria (including, but not limited to, the person's ability, experience, behavior, work performance and demonstrated potential in relation to the needs of the job).
- Loomis shall offer an **open and transparent working environment** and is committed to promote a working environment where employees communicate any issues or concerns that they have regarding their job or about any aspect of Loomis' work.
- Loomis is committed to **encourage employees to grow** and actively develop their skills by providing good opportunities to train for job enrichment and wider responsibility.

- Loomis supports the right to **freedom of association** and is committed to respecting union rights. We also respect the employees' right to refrain from joining a union. Loomis regularly consults with unions, has union representatives serving on the Loomis AB Board of Directors and has a well-functioning European Works Council with representatives of company employees that is convened yearly to promote dialogue between trade unions and management.
- Loomis shall with respect to the terms of employment always **comply with legislation and collective agreements** as they pertain to each country of operation. Subject to each country of operation's laws and regulations, it is the company's intention that every employee shall receive a description of their duties that also states working hours and pay.
- Loomis is committed to offering fair and objective employment terms and remuneration, and therefore applies the so-called **grandparent principle** to all employee-related issues. The grandparent principle means that all employee-related decisions must be approved by a manager at the next level up from the relevant employee.
- Loomis respects the employees' right to **privacy** and shall handle employee data responsibly and in compliance with applicable privacy and data protection laws.

The employees' commitment to Loomis

- Employees are expected to demonstrate their **commitment to the Loomis Values and the Code** in their actions. Every decision impacts the company's culture and reputation, so every employee is expected to make decisions that weigh up both legal and ethical issues.
- Employees are expected to contribute to create an **open, healthy, safe and transparent** working environment where people are treated with respect and dignity. Employees shall be sensitive to and respectful of values, concerns and preferences of colleagues and other persons.
- Employees shall perform their jobs with **loyalty to the company** and make business decision based on the best interest of Loomis, putting the interests of the company above any personal self-interest. Employees must seek to avoid both the appearance of, as well as actual, conflicts of interest, as these conflicts can interfere with acting in the best interest of the company. Potential conflicts of interest must be disclosed by the employee to the local manager and managed properly.
- No employee shall engage in **assignments for third parties** that in any way compete with, or compromise, their work for Loomis or misuse their position for personal gain.
- Employees are expected to stay **vigilant** against the internal risks of theft, loss, and shortages at the branch, perform their jobs with **honesty**, and to protect their branch's integrity by reporting any suspicious activities at their branch. Given the nature of our operations, protecting our customer's interests is the responsibility of all employees.
- Employees shall safeguard and **not misuse Loomis' assets**. Any company property, equipment, resources, and funds must be used only for business purposes and not for personal gain. When an employee ceases to be employed by Loomis, the employee must leave all Loomis' assets (including documents) in the possession of Loomis without making any copies.

- Employees shall maintain the **confidentiality of information** entrusted to them by Loomis and not share such information with third parties, except when disclosure is authorized or legally mandated. Such information includes sensitive as well as non-public information about the company, our business and employees, customers, and suppliers. For example, financial information, trade secrets, pricing, strategies and business plans, product information and customer and supplier lists. But also, for example details about Loomis' and our customers' site locations, equipment, hardware, schedules, vehicles, and technical specifications. The obligation to protect confidential information continues after termination of employment.
- Employees may come in contact with confidential information about Loomis that is likely to affect the price of the Loomis share or related financial instruments, so called **inside information**. When an employee has access to inside information, the employee is subject to legal and regulatory duties and violation of these duties may constitute a criminal offence. Insider trading and unlawful disclosure of inside information are strictly forbidden.
- Employees are expected to cooperate with the **internal control** functions when investigations are conducted and with routine controls during the recruitment process and unannounced checks during normal operations.
- Employees shall immediately **report every violation**, or suspicion thereof, of the Code or any other group steering document, laws rules or regulations.

3.2. Outside the company

Loomis is committed to being a trusted partner, therefore the Code also sets out several commitments towards stakeholders outside of the company. Communicating to customers and other stakeholders that Loomis is a company of integrity and with the highest ethical standards, visible in the actions and engagement of our employees.

- Loomis shall comply with **applicable laws and regulations** in the respective country of operations² and be prepared to upon request, demonstrate compliance to customers and regulators.
- **Long-term sustainable development** is an integrated part of Loomis' business model, where Loomis ensures that the business meets the needs of the present without compromising the wellbeing of future generations.
- Loomis shall work to understand the **environmental and climate impacts** along our value chain and shall continuously aim to reduce climate impact of our business. Loomis supports a precautionary approach towards the environmental challenges and undertakes initiatives to promote a continuously greater environmental responsibility.

² If the Code is found to conflict with national law, then the stricter should apply, provided that the Code does not violate the law.

- Loomis is committed to always respect and operate in accordance with all human rights and in accordance with the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.
- Loomis does not engage in, or accept, any form of **child labor** or **forced, involuntary or trafficked labor**.
- Loomis shall engage in **fair and proper competition** in full compliance with applicable antitrust and competition laws, including to refrain from activities or agreements with competitors that are unfair, deceptive, misleading, or anti-competitive (such as price fixing and allocating markets).
- Loomis does not tolerate any form of **bribery or corruption**. We never promise, offer, give, or accept bribes or other improper benefits, for example gifts, reimbursements or entertainment, with the purpose of influencing decisions or securing an improper advantage. The country of operation's customs, laws and regulations as well as any Loomis' internal guidelines shall be observed, and the stricter shall apply. Gifts offered or received that are considered inappropriate shall be reported to the local manager. Payments to agents involved in tenders or transactions with public entities or state-owned companies shall be monitored to ensure that no bribes can be suspected.
- Loomis allows legally acceptable **donations and sponsorships** of both a commercial and non-commercial nature. Any such contributions must be documented. There shall be a formal local policy for donations and sponsorships in each country of operations, to be determined by the Country's President. Loomis shall refrain from participating in projects of a political or religious nature, or that benefit private individuals.
- Loomis' customers' liability shall be protected with robust **risk management policies and procedures**. Our operational risk management strategy rests on two pillars: no loss of life and striking a reasonable balance between risk of theft and robbery and the cost of mitigating such events. Customer, and other third party, data shall be protected by strict confidentiality and appropriately safeguarded by adhering to extensive information security protocols configured to keep such data secure.
- Loomis shall be a **responsible taxpayer**. The objective of Loomis' tax handling is that the right amount of tax is paid in the right country while protecting the Loomis brand as well as creating value for the shareholders.
- Loomis is committed to prevent that we are being used as a tool for **financial crime** by continuously develop our ability to manage the money laundering and terrorist financing risks that we are exposed to. We also have procedures in place to comply with applicable international trade rules.
- Loomis' **communication** shall be used to create an understanding and knowledge of Loomis' strategy, business operations and financial position and build trust with all of Loomis' stakeholders. All information communicated, such as financial, ESG and non-financial information, must be correct, relevant and timely. Only appointed spokespersons are entitled to make public statements on behalf of Loomis.

3.3. Compliance responsibilities

- **All employees** are responsible for reviewing and seeking to fully understand and follow the Code. Employees must also consult the Group’s other steering documents relevant to their work, available in the Group Policy Hub, as they give additional direction and details to many of the areas covered by the Code.
- **Managers** are also expected to act as role models by demonstrating the intent and spirit of the Code and instilling a culture of honesty, vigilance, and high ethical standards within his/her area of responsibility.
- The respective **Country President**³ is responsible for ensuring the implementation and execution of the Code within his/her country of operations, including the assurance that the Code adheres to national laws and regulations. The Country President shall also ensure that effective training is provided to all employees so that employees understand the Code, how it relates to them and how to report violations.
- Loomis AB’s **Board of Directors** has the ultimate responsibility for the Code.
- **Violations of the Code** or other group steering documents, and any other failure to act ethically, is serious and can result in disciplinary actions, even including termination of employment. Acts that are inconsistent with the Code must also be corrected as soon as possible.

4. Ask questions

If in doubt on how to apply the Code, guidance should primarily be sought from the local manager or a member of the country of operations’ Human Resource Department. It is also possible to reach out to Loomis AB’s Chief Human Resources Director or a member of the Group Legal team.

5. Speak up

Loomis will not accept any violations of the Code, or other group steering documents, and will investigate and take appropriate measures in case of misconduct. In line with this commitment, Loomis expects all employees who have concerns about any aspect of Loomis’s work to come forward and report such concerns to the company.

Loomis primarily encourages employees to contact the local manager or a member of the country of operation’s Human Resources function. Any incident that may have an impact on customers or the public image of Loomis should always be reported to Loomis AB’s Human Resources Director.

³ Loomis AB’s President and CEO may, on a case-by-case basis, resolve that with respect to a certain group entity such entity’s CEO, instead of the Country President, shall carry the responsibilities.

For issues where the employee does not feel comfortable reporting through the above channels, reporting can also be made through the Loomis Integrity Line. The employee can decide to remain anonymous and whether the report is made locally to the country of operation, to group management or to the chairman of Loomis AB's Audit Committee.

There will never be any retaliation for, in good faith, reporting violations or suspicion thereof to the company. Any employee who engages in retaliation will be subject to disciplinary action.

6. Update and approval

Loomis AB's Board of Directors shall review and adopt the Code annually or, if deemed necessary, whenever there is a need or requirement to do so.

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