



Code of Conduct

Values & Ethics





Message from the CEO

Years of experience lead to the best service

Don't aspire to make a living, aspire to make the difference. Eye Watch Security Group BV helps to build, contribute and maintain to a secure future for our customers, employees, shareholders and stakeholders.

We do promote long-term sustainability and growth, because of investment in employees, technology and security services.

It is vital that we follow laws, maintain high ethical standards and uphold our shared values in all our operations. This is the foundation on which our customers, employees, shareholders and other stakeholders base their confidence in Eye Watch Security Group BV.

Eye Watch Security Group BV Code of conduct and Values & Ethics Code is one of Eye Watch Security Group BV key corporate policies. It sets out the fundamental principles that all employees and business partners are expected to follow at all times.

All employees at Eye Watch Security Group BV are responsible for making sure that nothing ever compromises our commitment to integrity, vigilance and helpfulness or the principles of Eye Watch Security Group BV Values and Ethics. Managers at Eye Watch Security Group are responsible for setting a good example.

Values and Ethics Code is mandatory and ensures that Eye Watch Security Group BV will continue to be an organization that is valued and respected by society and our customers, and for which we are all proud to work.

To help you to comply with the Code during the course of your daily work, ask yourself:

- Is the decision or action I am going to take in line with our Values and Ethics?
- Do I understand the risks involved and the possible implications of what I am doing?
- Am I leading by example?



At Eye Watch Security Group BV we believe that corporate responsibility is good business. This is evident from the fact that we continue to grow year after year. We do good business and grow to the top together.

Together!

Venray, August 2022

Dave van de Laar

CEO at Eye Watch Security Group BV



Code of Conduct

General principles

Eye Watch Security Group BV mission is to protect homes, workplaces and communities. For customers, employees, shareholders and other stakeholders to feel confident about the company, ethics and values have to play a prominent role in all our operations.

Ethical conduct is good business. Ethics must be an everyday concern and every action taken by eye watch security group bv and by each employee must at all times satisfy the highest ethical, moral and legal standards. Eye Watch Security Group BV operations are based on three fundamental basic values: Integrity, vigilance and helpfulness.

Integrity

Eye Watch Security Group BV insists on honesty in the way it conducts its business. The success of any business is largely dependent upon the honesty and integrity of its employees.

An Eye Watch Security Group BV employee must be honest in order to be trusted to work unsupervised on the customer's premises and with valuables. Eye Watch Security Group BV can never compromise in its demand for integrity and truthfulness. Integrity also includes openly expressing one's opinion and reporting improprieties and other relevant information.

Vigilance

Eye Watch Security Group BV insists on professionalism in the way we conduct our business. An Eye Watch Security Group BV employee must always be attentive and able to observe, listen and evaluate in order to protect the customer's premises and property and the ethics and values Eye Watch Security Group BV stands for.

Helpfulness

Eye Watch Security Group BV is committed to making people's lives safer. Our employee should always be ready to support and take care of our colleagues, clients and others who need assistance. In order to successfully fulfil the responsibilities outlined in this document it is essential that Eye Watch Security Group BV continues to maintain and develop a sound and profitable business to support the continuing investments required to develop our business to meet customer needs.

Eye Watch Security Group BV insists that the principles in this code of conduct are respected and applied throughout the organization and, within eye watch security group bv' sphere of influence, by all those with whom eye watch security group bv does business.



Code of Conduct

Society • Human Rights • Employees

Society

As an national leader Eye Watch Security Group BV has far-reaching responsibilities towards the communities in which we operate. We must practice good corporate citizenship and comply with laws.

Human Rights

Eye Watch Security Group BV expresses support and respect for fundamental human rights and recognizes our responsibility to observe those rights when we conduct our business. Among those rights that Eye Watch Security Group BV considers as fundamental are: freedom of thought; conscience and religion; freedom of opinion and expression; freedom from any kind of discrimination based on race, creed, colour, nationality, ethnic origin, age, religion, gender, sexual orientation, marital status, disability, or other status; freedom from arbitrary detention, execution or torture; and freedom of peaceful assembly and association.

Employees

Eye Watch Security Group BV business is based on trust. To make sure that our customers trust us requires that all employees respect and protect our ethical philosophy and basic values as reflected in this code and in Eye Watch Security Group BV employee guide "basic values".

Eye Watch Security Group BV strives to be the best at developing its business. The relationship with all employees must be built on mutual respect and dignity. We strongly believe in the connection between the competence of our employees and the result we achieve. To attract skilled people, we have to be an attractive

employer that offers good working conditions, fair wages and appropriate training.

Eye Watch Security Group BV will not use forced or any form of involuntary labor or employ any person below the age of 16.

Eye Watch Security Group BV is an equal opportunity employer. Discrimination in hiring, compensation, training, promotion, termination or retirement based on ethnic and national origin, religion, sex or other distinguishing characteristic is never acceptable.

Eye Watch Security Group BV promotes a productive work environment and does not tolerate bullying or harassment.

Eye Watch Security Group BV recognizes the importance of providing a safe and healthy working environment and taking necessary reasonable steps to prevent accidents.

Eye Watch Security Group BV recognizes the importance of a continuous social dialogue.

Eye Watch Security Group BV recognizes the importance of fair wages. Eye Watch Security Group BV strategy is to raise wages to a level that meets or exceeds a "living wage" and wages and benefits shall at least equal the legal or industry minimum standards.

Eye Watch Security Group BV shall comply with applicable working time regulations reflected in national legislation or industry standards.



Code of Conduct

Business Ethics • Dialogue • Implementation • Values & Ethics

Business Ethics

Eye Watch Security Group BV insists on honesty, integrity and fairness and is strongly committed to upholding and promoting the highest ethical business standards in all aspects of our business. Eye Watch Security Group BV recognizes that corruption and anti-competitive measures distort markets and hamper economic and social progress. It is therefore essential for eye watch security group bv to avoid such practices.

We support efforts by national authorities to establish and enforce high ethical standards for all businesses.

Eye Watch Security Group BV shall comply with applicable competition legislation. Honest competition must be based on integrity, product quality, price and customer service. Eye Watch Security Group BV does not accept soliciting or acceptance of bribes in any form.

Business decisions must always be based on objective reasons and criteria and employees must avoid conflict of interest between their private activities and their part in the conduct of Eye Watch Security Group BV business.

Dialogue

Eye Watch Security Group BV recognizes the importance of having an open communication with those that are affected by our operations, whether they are employees, clients, investors or the public and their representatives.

Comprehensive corporate information is available for interested parties and Eye Watch Security Group BV will respond in a timely manner to inquiries.

Implementation

It is the responsibility of each Eye Watch Security Group BV employee to observe and promote this code. Each employee is requested to report violations of the code to his/her manager for investigation. If a complaint is not resolved or where the allegation is of a serious nature it must always be reported to local senior management who will ensure that a comprehensive investigation is carried out and, where necessary, that relevant corrective measures are implemented.

Eye Watch Security Group BV code of conduct draws on the following sources: the United Nations Universal Declaration of Human Rights and the European Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR).

Values & Ethics

Abiding by laws, maintaining high ethical standards and upholding our shared values play a prominent role in all of Eye Watch Security Group BV operations and provide the foundation upon which our customers, employees, shareholders and other stakeholders base their confidence in Eye Watch Security Group BV.

These principles also play an important role in maintaining the strong value of the Eye Watch Security Group BV brand and in promoting long-term sustainability and growth for our national business.

Eye Watch Security Group BV values and ethics code (the "code") is one of Eye Watch Security Group BV key corporate policies and sets out the fundamental principles to which Eye Watch Security Group BV expects all of its employees and



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Values & Ethics • Human Rights • Employees



and business partners to adhere at all times. The code is closely linked to, and should be read in the context of, Eye Watch Security Group BV values of integrity, vigilance and helpfulness and other guiding documents, such as the eye watch security group bv group policies and guidelines.

It is the responsibility of Eye Watch Security Group BV as a company and all Eye Watch Security Group BV employees and board members to understand and comply with the code. Eye Watch Security Group BV also expects all of its business partners at various levels to abide by the principles of the code.

All employees and business partners are encouraged and expected to report any incidents of non-compliance, with the assurance that there will be no reprisals or other negative consequences for persons reporting in good faith. This code is a minimum standard, but does not in any way preclude or replace collective bargaining.

While the code provides guidance on numerous matters pertaining to acceptable standards of integrity and appropriate business conduct, it would be impossible to codify every situation that may arise in the day-to-day business of Eye Watch Security Group BV national operations. Therefore, the code cannot replace each individual employee's or partner's responsibility to exercise his/her good judgement in abiding by the spirit and purpose of the code as well as the letter of it.

Eye Watch Security Group BV supports the principles of the following sources: the united nations universal declaration of human rights and the european convention

for the protection of human rights and fundamental freedoms (echr) and we are committed to upholding these principles in our policies, procedures and day-to-day practices.

Compliance with local laws and regulations
The code represents a minimum standard and is to be adhered to in Eye Watch Security Group BV operations, even if it stipulates a higher standard than local legislation.

Eye Watch Security Group BV may adopt and apply principles that are more stringent or detailed than those set out in the code. If such rules are issued, the local rules apply in addition to the code.

Human Rights

Eye Watch Security Group BV supports and respects the fundamental human rights set out in the united nations universal declaration of human rights and the european convention for the protection of human rights and fundamental freedoms (echr) and recognizes its responsibility to promote and observe those rights when conducting its global business.

Employees

Our employees are our most important resource. Eye Watch Security Group BV aims to be a solid, trustworthy and stable employer, and promotes relationships based on mutual respect and dignity. We strongly believe in the connection between the competence of our employees and the result we achieve.

To attract skilled people, Eye Watch Security Group BV strives to be an attractive employer that offers good working conditions, fair wages and opportunities for



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Freedom of Association • Health and Safety • Equal Opportunity Harassment • Child Labour or Forced Labour • Alcohol and/or Drug Abuse • Social Networking • Business Ethics

personal development.

Remuneration and terms of employment
Eye Watch Security Group BV recognizes the importance of fair wages and reasonable working hours. We work to raise wages and benefits to a level that meets or exceeds the national legislation or minimum industry standards. Information on wages and benefits, as well as other terms of employment, should be communicated clearly to each employee.

Freedom of Association

Eye Watch Security Group BV respects the rights of all employees to choose whether or not to be represented by a trade union for the purpose of collective bargaining and to form and join trade unions of their choice in accordance with local laws and principles. This includes respecting freedom of peaceful assembly and association. No employee should risk being harassed or retaliated against for exercising these rights.

Health and Safety

Eye Watch Security Group BV recognizes the importance of providing a safe and healthy working environment and taking all reasonable steps to prevent accidents and injuries, as well as supporting measures to promote health and wellbeing.

Equal Opportunity

Eye Watch Security Group BV is an equal opportunity employer and all employees are to be treated fairly and equally. Discrimination in recruitment, salary, training, promotion, termination or retirement based on ethnic and national origin, religion, sex, sexual orientation, marital or parental status, disability or other distinguishing characteristics protected by

applicable law is never acceptable. All employment decisions are to be made solely on the basis of a person's ability, experience, behavior, work performance and demonstrated potential in relation to the needs of the job.

Harassment

Eye Watch Security Group BV promotes a productive work environment and does not tolerate any form of harassment, bullying or abuse. All employees should be treated and treat one another with dignity and respect.

Child Labour or Forced Labour

Eye Watch Security Group BV does not employ or accept any form of child labour or forced or bonded labour.

Alcohol and/or Drug Abuse

Eye Watch Security Group BV is committed to Providing a drugfree workplace and expects all employees to refrain from any alcohol and/or drug abuse that may affect their work.

Social Networking

Eye Watch Security Group BV respects the individual's right to free speech and freedom to express one's opinion. However, only employees expressly designated to do so are authorized to make public statements on behalf of Eye Watch Security Group BV. Employees and business partners who engage in activities in social media are encouraged to behave in ways that are consistent with eye watch security group bv values and policies.

Business Ethics

Eye Watch Security Group BV insists on honesty, integrity and fairness and is strongly committed to upholding and



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Fair Competition and Competition Law • Bribery, Corruption and Money Laundering
Conflicts of Interest

promoting the highest ethical business standards in all aspects of our business. We practice good corporate citizenship and comply with laws and regulations in our country. Eye Watch Security Group BV also has a responsibility to continue the development of the entire industry. By cooperating with trade organizations, unions, public authorities and law enforcement, Eye Watch Security Group BV helps develop services and the market as a whole with the goal of raising standards and wages in the industry.

Fair Competition and Competition Law

Eye Watch Security Group BV believes in fair trade and honest competition, based on integrity, product quality, price and customer service. While we may join associations in order to advance the industry, we do not entertain discussions or enter into agreements with competitors concerning pricing, market shares or other similar illegal activities and are firmly committed to respecting all applicable laws and regulations promoting fair competition.

Bribery, Corruption and Money Laundering

Eye Watch Security Group BV strives to offer the best possible services targeted to our customers' specific needs and expects to be selected as a Provider of Services on the basis of merit, in a free and fair competitive environment. Eye Watch Security Group BV does not offer, solicit or receive bribes, facilitation payments or other illegal payments to obtain or retain business.

Eye Watch Security Group BV aims to do business only with respectable business partners involved in lawful business activities and whose funds are derived from

legitimate sources. Eye Watch Security Group BV does not facilitate money laundering and abides by the general antimoney laundering principles set out in relevant conventions against corruption and money laundering within the spirit of the code.

Entertainment, gifts, gratuities and donations purchasing and sales activities must be handled with the utmost integrity. Employees and business partners should not give or accept any gifts, gratuities or entertainment offers that could influence business transactions or the employee's, business partner's or customer's decision making. Gifts of minor value are sometimes part of local business culture and as long as allowed and legally permissible can then be accepted. Local Eye Watch Security Group BV entities are expected to implement more detailed guidelines and principles for what is acceptable on a local level, in compliance with applicable laws and the code.

Conflicts of Interest

Business decisions must always be based on objective reasons and criteria, and employees and business partners must avoid all conflicts of interest or perceived conflicts of interest between their personal activities and their part in the conduct of Eye Watch Security Group BV business.

Political contributions and political activities Any public policy or political activity undertaken on behalf of Eye Watch Security Group BV must be lawful, ethical and in accordance with Eye Watch Security Group BV values and policies. Employees are not allowed to use, or consent to the use of, any corporate funds, resources or facilities to



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Privacy and Data Protection • Confidentiality • Intellectual Property
Environment and Sustainability

support a government entity, political organization, party or candidate, except where legally required and where there is an established, lawful and generally accepted practice to do so. All contributions made from corporate funds must be lawful, transparent and preapproved by the ceo.

Privacy and Data Protection

Eye Watch Security Group BV respects the individual's right to privacy and is committed to handling personal data responsibly and in compliance with applicable privacy and data protection laws.

Confidentiality

All employees and business partners are expected to exercise particular care to prevent any unauthorized use or disclosure of Eye Watch Security Group BV confidential or proprietary information. Non-public information belonging to our customers or business partners to whom we gain access through our business must also be protected, in accordance with all legal and contractual requirements.

Intellectual Property

The entire value of our long history of providing professional security services is vested in the Eye Watch Security Group BV trademark. Eye Watch Security Group BV, as well as all employees and business partners, must work to safeguard this trademark and respect the valid intellectual property rights of others. Protecting company property and resources Eye Watch Security Group BV property, resources and information systems must be protected and kept secure at all times from unauthorized use, damage, disclosure, diversion or removal, whether through accident, improper act or breach of

trust.

Disclosures, records and internal control Eye Watch Security Group BV recognizes the importance of having an open communication with those that are affected by our operations, whether they are employees, business partners, customers, investors or the public and their representatives. Comprehensive and accurate corporate information is available for interested parties and Eye Watch Security Group BV will respond in a timely manner to inquiries. All reporting and accounting documentation clearly identifies the true nature of business transactions, assets and liabilities in conformity with relevant regulatory, accounting and legal requirements and is given to the best of our knowledge. Our aim is full accountability. Eye Watch Security Group BV accounting and reporting standards are set out in the group policies and guidelines and in the Eye Watch Security Group BV reporting manual. We apply the Eye Watch Security Group BV communication policy in all our communications.

Environment and Sustainability

Eye Watch Security Group BV strives to conduct its business in an environmentally sustainable way and shall comply with or exceed environmental requirements set by applicable laws, regulations and national agreements.

We are expected to continuously seek ways to reduce the consumption of resources, emissions and waste. Targets for emissions are set out in the Eye Watch Security Group BV emissions policy.



Code of Conduct

Implementation and Compliance

Implementation and Compliance

It is the responsibility of the ceo and of each Eye Watch Security Group BV employee to observe and promote the code.

The Field Coordinator and HSE Quality Inspector are responsible for ensuring the implementation of the code. The ultimate responsibility lies with the ceo.

The code shall also be communicated and implemented, to the greatest extent possible, in all business partner and employee contractual relationships. For the purposes of the code, our customers are not regarded as business partners. Business partners may include suppliers, subcontractors and other partners.

Implementation of and compliance with the code will be monitored on an ongoing basis as part of our quality management. The code shall be reviewed annually. It is also the responsibility of each Eye Watch Security Group BV employee and business partner to raise concerns about compliance with the code.

When an employee or business partner wishes to make a complaint or report a violation of the code, his/her manager or a representative of the human resource management should be informed. If the employee finds it difficult to bring up an issue locally, if a complaint is not resolved or where the allegation is of a serious or sensitive nature, it should be reported through one of the following channels:

Website

www.eyewatchsecuritygroup.net

Telephone

See website for local telephone number.

E-mail

info@eyewatchsecuritygroup.net

Office

Eye Watch Security Group BV
Keizersveld 87a
5803 AP
Venray
The Netherlands.

A more detailed description of the complaints procedure, its purpose and use, can be found in the policy for the Eye Watch Security Group BV integrity line. All complaints will be investigated. As far as reasonably possible, an employee's information will be treated confidentially and no employee will be discriminated against for reporting, in good faith, what are believed to be possible violations of the code. An employee making such a report will receive feedback as appropriate.

Eye Watch Security Group BV monitors compliance with the code on a regular basis, using information reported through the various channels available. Acts that are inconsistent with the code must be corrected promptly and employees violating the code are subject to disciplinary action up to and including termination of employment. Where a violation of the code results in an offence punishable by law, Eye Watch Security Group BV may notify the authorities of such violation.