

SKG CODE OF CONDUCT

Effective Date: February 1st 2019

1. GENERAL

The reputation of the SK FireSafety Group (hereinafter: SKG or Group) is one of the key assets of our Group. Management of SKG strives to develop and maintain a right mix of integrity, loyalty and critical thinking as a cornerstone of our Group. The Code of Conduct (hereinafter: Code) sets out the corporate values and rules of conduct that all stakeholders of SKG (in particular employees, suppliers, customers, agents and distributors) must follow in our everyday choices, behaviours and decisions.

The main aim of SKG's Management with this Code is to provide clear guidelines and describe essential rules of conduct on what SKG interprets to be acting on what SKG interprets to be acting with integrity, loyalty and critical thinking. A high level of awareness of the values, rules and regulations is fundamental.

It is essential to safeguard a culture of mutual trust and to value differences of opinions as well as cultural diversity. In order to promote a culturally diverse work environment, any regards to race, colour, national origin, religion, age, sex, sexual orientation or disability should not be permitted. Compliance with this Code contributes to long-term protection for company reputation and continuity and it guarantees the desired level of integrity, loyalty and critical thinking.

The rules and guidelines set out in this Code are in addition to any international, supranational, national and regional laws, regulations, ordinances and other legal provisions that apply to SKG and its business dealings. In case any such laws, regulations, ordinances or other legal provisions provide for more stringent provisions than the provisions as set out in this Code, such more stringent provisions shall apply.

Management of SKG may decide to supplement this Code with more specific regulations on one or more of the individual topics covered in this Code.

2. CORPORATE VALUES

SKG is committed to sound business conduct and therefore manages its business according to the corporate values and ethical behaviour described in this Code. The right balance of integrity, loyalty and critical thinking defines business principles.



2.1 INTEGRITY

SKG highly values being a true and trustworthy partner and carries out its activities in a responsible manner that protects the interests of everyone involved as well as the public. We expect fair and respectful treatment towards each other, customers, business partners (e.g. agent, suppliers, intermediaries, subcontractors) and competitors, and to be fair, respectful, reliable and truthful in our business dealings.

2.2 LOYALTY

Employees and business partners of SKG have the duty to act in the best interest of SKG and its stakeholders. SKG's Code is a statement of legal and ethical principles that applies to every situation of conducting business for SKG. SKG strives to create loyalty with its clients by acting honestly at all times. We strive for relationships built upon the fundamental conditions of cooperation and long term relationships with customers and third parties.

2.3 CRITICAL THINKING

Constructive criticism should be appreciated as part of our focus (as business partners) on integrity, loyalty and quality, which should constantly be assessed and enhanced. We encourage and respect critical thinking and the voicing of any criticisms or concerns from all levels.

3. RULES OF CONDUCT

This Code includes the corporate values of SKG as referred to in the previous paragraph and the translation of these values into general conduct rules and guidelines. The Code applies to all employees, representatives, self-contractors and business partners of SKG and should become an integral part of their way of thinking, leading them to apply the Code in their daily work.

Each employee, representative, self-contractor and business partner who is aware or suspects any violation of the provisions of this Code, is urged to report such violations to SKG's (local) management. Such notification can also be made anonymously. No employee, representative, self-contractor or business partner of SKG who reports a (possible) violation of the provisions of this Code in good faith, has any disadvantages to fear.

3.1 CONDUCT OF EMPLOYEES AND BUSINESS PARTNERS

3.1.1 RESPECT AND EQUAL TREATMENT

Mutual respect enables people to do their work well with the right instruments, resources and training. No harsh or inhumane treatment or harassment is tolerated, nor any form of discrimination on whatever ground.



3.1.2 CONFLICTS OF INTEREST

Decisions must not be influenced by personal and private considerations. Therefore, any activity that conflicts (or could conflict) with the employee's or business partners' responsibilities should be recognized and avoided as soon as possible. These are, for example, employment or other business relationships with a competitor, customer or supplier; misusing the position of the employee or business partner within SKG to benefit him- or herself, family, friends or other third parties.

Any sideline employment or professional consulting activities of an employee or business partner may not be detrimental to the interests of SKG and require the prior written approval of SKG's management.

3.1.3 PRIVACY AND DATA PROTECTION

Respecting and protecting any confidential information is absolutely important. This means that access to such information is limited to employees, representatives, self-contractors and business partners who have appropriate authorisation and a clear business need for that information. Each employee and business partner of SKG must be aware of the fact that information must remain secure and act accordingly.

Protection of privacy of customers' and business partners' personal data and communications must be assured. Using, modifying, sharing or distribution of customer's (or business partner's) information without a proper business reason and proper authorization is strictly prohibited. Applicable laws and regulations in relation to collecting, processing and using of personal data (including but not limited to the EU General Data Protection Regulation) should at all times be complied with by employees, representatives, self-contractors and business partners.

3.1.4 SOCIAL MEDIA

The use of social media can have a negative impact on SKG's reputation. Therefore, employees and business partners are expected to uphold the Group's image and reputation and prevent making any statements that may be damaging to SKG. Any concern must be discussed with SKG firstly.

3.1.5 BOOKS AND RECORDS

SKG believes it is vital to report accurate and non-misleading financial information about SKG and its activities. This begins with precise accounting and authorisation of all business transactions in the bookkeeping process. Our records provide a complete and transparent picture; timely, reliable and relevant information is maintained. Decisions, with respect to all business transactions, should be properly documented.



3.1.6 CONFIDENTIALITY

Business information is one of SKG's key assets and must be treated as confidential. Disclosure of any confidential business information (as well as financial, personal or technical information, plans, or collected data) to unauthorized parties is strictly prohibited.

3.2 CUSTOMERS, BUSINESS PARTNERS AND COMPETITORS

3.2.1 CORPORATE SOCIAL RESPONSIBILITY

SKG stresses the importance of Corporate Social Responsibility and we account for our efforts to responsibly meet the world's growing economic, environmental and social needs. Within SKG, socially-responsible business has been translated into a number of themes. Our business operations should comply with the social demands of the environment and safety considerations. Environmentally friendly solutions are offered to clients and end users, whenever possible, with durability and degradability as important criteria.

3.2.2 CHILD AND FORCED LABOUR

SKG strictly adheres to human rights regulations and do not tolerate child labor and/or forced labor. The conventions of the International Labor Organization and applicable laws and regulations in relation to child labor and forced labor should be complied with by all employees, representatives, self-contractors and business partners of SKG.

3.2.3 FAIR DEALINGS

SKG strives to maintain a reputation as a trustworthy and ethical business partner. Fair dealing with all our customers, business partners and competitors. We must not take unfair advantage of anyone through any misrepresentation of material facts, manipulation, concealment, abuse of privileged information, insider information, fraud or other unfair business practice.

3.2.4 ANTI-CORRUPTION AND BRIBERY

The giving, offering, promising, accepting, agreeing to receive or requesting gifts, invitations, bribes or other inappropriate benefits is prohibited. This applies not only to the benefits of SKG's associated persons and business partners, but also in relation to any public official including representatives or employees of authorities and other public organizations as well as civil servants and employees of state companies and public international organizations. Only inexpensive promotional gifts (being gifts with a value of no more than EURO 50 (Fifty) or local equivalent) or minor invitations for entertainment are not considered bribes, provided that local customs and applicable laws and regulations are complied with. Keep in mind that even unsubstantiated claims of corruption can damage our reputation.



Any appearance of dishonesty and impropriety must be avoided. Cash payments or other benefits may not be granted with the aim of influencing decisions or gaining unlawful advantages.

3.2.5 DONATIONS

Donations or other payments may be made under certain conditions to social institutions or charities, but not to individual persons and any donation may only be made upon the issue of a valid receipt.

3.2.6 MONEY LAUNDERING

SKG is committed to preventing the use of resources for the purpose of money laundering, which is defined as an attempt by individuals or organisations to hide the proceeds of criminal activity by making those criminal proceeds legitimate. SKG aims to enter into business dealings only with business partners whose business complies with applicable laws and regulations and whose financial resources come from legitimate sources. SKG must make or receive payments for goods and services only via approved and properly documented payment practices.

All employees and business partners of SKG must comply with anti-money laundering laws and regulations and are obliged to keep records and details of any cash or other transaction with a third party.

Any suspicions of an employee, representative, business partner or other stakeholder of SKG in relation to money laundering should be reported to SKG's management.

3.2.7 COMPETITION

SKG supports a free market and competes with other companies in its field in a professional, honest and ethical way. We do not tolerate violations of antitrust laws (e.g. arrangements on pricing with competitors and market divisions are forbidden but also fixing prices of sales agents).

All employees and business partners of SKG must comply with anti-trust laws and regulations. Any suspicions of an employee, representative, business partner or other stakeholder of SKG in relation to a (potential) violation of anti-trust laws and regulations should be reported to SKG's management.

3.2.8 PATENTS AND TRADEMARKS

Patents, trademarks and other intellectual property are part of the corporate identity and cannot be shared with any outside party. They are key strategic tools for achieving business objectives. No patents, trademarks or other intellectual property rights of any



third party shall be used by SKG or any of its business partners, unless such use is authorized by such third party.

3.2.9 EXPORT CONTROLS

SKG is dedicated to delivering a high-quality service to customers worldwide, and in order to do this, we may be required to export equipment, technology, services or software to another country. According to the export control regulations, exports also include electronic transfers. We must comply with all relevant export control and customs regulations.

3.2.10 PROCUREMENT

SKG follows an active procurement policy with the goal of reaching cost reductions and addressing sustainability and innovation through cooperation with suppliers. Procurement and other SKG personnel who may influence supplier selection and on-going relationships with suppliers must be particularly careful to ensure that situations which may give rise to a conflict of interest do not arise.

