



Policy development

One of the cornerstones of the ERM process is the **Group Policies and Guidelines that establish the framework for all policies and compliance monitoring in the Group. The Group Policies are developed by management but are approved by the Board.**

After performing the yearly risk assessment and establishing risk business plans, decisions are made as to whether to create new policies or amend existing policies based on that input. A general policy update is released after the statutory Board meeting in May every year, but specific policies are also issued when necessary throughout the year.

Some of the key policies adopted by Securitas that are relevant from a governance perspective are:

- **Contract policy** which sets out the process and main principles for managing customer contract risk, based on standard terms, a full customer and contract risk evaluation, as well as a framework of key policies for contracting security services and solutions. The objective is to manage the risks arising from customer contracts, and to ensure that all customer contracts have a fair and reasonable allocation of responsibility and risk between the customer and Securitas and that the price reflects the risk taken on by Securitas.
- **The Securitas' Values and Ethics Code** ensures that the company upholds and promotes the highest ethical business standards. Securitas'

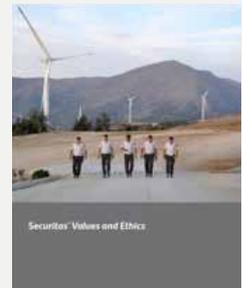
basic requirement is to act within the framework of laws and international conventions, such as the United Nations Universal Declaration of Human Rights. This means that Securitas respects and complies with competition rules, environmental legislation, labor market regulations, agreements and safety requirements and any other provisions that set the parameters of our operations. For further information on Securitas' initiatives and responsibility with regard to social, economical and environmental issues, refer to pages 18-24.

- **Communication policy** in accordance with the stock market's requirements for information with the aim of ensuring that the company fulfills these requirements.
- **Competition law compliance policy** with the aim of ensuring that Securitas and its subsidiaries or affiliates are committed to full compliance with all competition laws and regulations.
- **Insider policy** as a complement to the insider legislation in force in Sweden.

> Examples of activities during 2013

The Board adopted a detailed **anti-corruption policy**, clearly setting out the principle of zero tolerance for any corrupt practices with clear definitions, requirements for risk assessment, guidance regarding third-party relationships, as well as

training requirements, reporting, investigations and follow-up. In order to properly guide the employees, the policy requires each local entity to adopt a gift and entertainment policy.



Securitas' Values and Ethics Code



Securitas' Anti Corruption policy