

# Code of Ethics

Doing what's right





# Welcome



Welcome to BauWatch's Code of Ethics!

As a market leader and a high-growth company expanding into new markets, we are committed to maintaining and setting the highest ethical standards.

At BauWatch we believe that success goes hand in hand with responsible, transparent, and ethical business practices. We embrace the principle of creating economic value while also enhancing social values. We take responsibility, not only focused on good economic decisions, but also on how they impact the world today and for future generations. With this in mind, we present you our Code of Ethics, which serves as a guiding document for all our employees, partners, and stakeholders, outlining our core principles and values. The Code sets clear expectations for behavior, placing a strong emphasis on integrity, trust, and respect. It provides essential guidance on fairness, honesty, compliance, conflict of interests, confidentiality, diversity, inclusion, and the importance of safe work environment.

As we venture into new markets, we remain adaptable while maintaining our unwavering commitment to ethical conduct, we encourage everyone to familiarize themselves with the Code and integrate its principles into their daily activities. By doing so, we cultivate a culture of integrity, accountability, and professionalism.

Thank you for embracing our Code of Ethics, as we work together to build a company that excels in the temporary surveillance industry while upholding our strong ethical principles.

Al Ghelani

# 8 principles



**Respect  
for the law**



**Fair employment  
practices & diversity**



**No conflict  
of interest**



**No bribery &  
corruption**



**Anti-trust &  
competition**



**Safeguarding assets  
and information**



**IT & data security  
and digital media**



**Responsibility to the  
environment and  
communities**

# Respect for the law & diversity



**“We comply  
with all  
laws and  
regulations.”**

## **The Principle**

We do not tolerate any form of bribery or corruption. Business decisions at BauWatch are based on objective criteria such as a business partner’s reliability and integrity, the price and the quality of products or services. Decisions must never be influenced by the prospect of giving or receiving personal benefits. To avoid even the appearance of improper influence on decisions, BauWatch employees are prohibited from offering, demanding or accepting inappropriate gifts and entertainment under any circumstances. We recognize that giving and accepting gifts and corporate hospitality can be a legitimate way to generate long-lasting goodwill in business relationships. Specifically, gifts and hospitality must always be appropriate, represent bona fide business expenditures and should not be offered or accepted if doing so could influence the outcome of a business transaction or be perceived as influencing such a decision. Care is especially required in relation to gifts or hospitality involving government officials. However, if gifts and hospitality are disproportionate or inappropriate, they can cloud judgement, so always exercise caution. When in doubt, employees must seek prior permission from their manager and report immediately when a favor has been given or received that might exceed these boundaries. Transparency is the best means of avoiding even the appearance of bribery or corruption.

## **The Purpose**

Corruption is corrosive and destroys trust in governments and business alike. It reduces the chances of bringing the best products and services for the best prices to those who need them most and supports the existence of unethical; or illegal structures.

# Fair employment practices & diversity



**“We create fair, safe and inclusive places to work.”**

## **The Principle**

We create fair and safe places to work where everyone can develop their potential. We will not tolerate discrimination based on gender, age, ethnicity, nationality, social status, political opinions or sexual orientation. Harassment, retaliation, bullying or disrespect have no place in the BauWatch culture, where everyone’s contribution counts.

We will take active steps to build and foster a diverse and inclusive culture that treats everyone with dignity and respect. Targets for diverse hiring and promotion, educating our teams on inclusiveness and including different perspectives and experiences in our business processes and decisions will give equal opportunity to all employees to contribute to our goals.

## **The Purpose**

Our organization and society at large become better and safer places to live and work where everyone has equal opportunity to realize their potential. Furthermore, we are convinced that inclusive and diverse teams are more creative, find new ways and drive necessary change – making us a better employer and a better business closer to our customers.

# No conflicts of interest



**“Business decisions are made exclusively in the interest of BauWatch.”**

## **The Principle**

Business decisions are made exclusively in the interest of BauWatch, the Group as a whole or the respective business division. Outside one’s employment relationship, personal interests and considerations, especially those of a financial nature, must not play a role at any level of decision-making. If employees experience an actual or even merely potential conflict between their business and private interests, the matter must be disclosed to the manager to seek a solution – if necessary, by consulting the next level of management.

## **The Purpose**

To maintain trust and confidence within BauWatch and with all others dealing with us, we must ensure that we make decisions that are in the best interest of BauWatch.



# No bribery & corruption



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# Anti-trust & competition



“We  
compete  
fairly.”

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# Safeguarding assets and information



**“Each of us is responsible for protecting and preserving the company’s property.”**

## **The Principle**

We use our assets in a proper manner and for their designated purpose. All of us are responsible for the detection and prevention of fraud, theft, misappropriations, and other irregularities. Some of our most valuable assets are intangible and include our trade secrets, intellectual property and company confidential information. We must guard our intangible assets just as we would our company’s equipment or money.

## **The Purpose**

Any improper use of BauWatch resources may result in significant added costs, disruption of business processes or other disadvantage to BauWatch. Theft, carelessness and waste hurt our financial performance.

# IT & data security and digital media



**“The efficient operation and security of our IT systems and data is the basis for the effective functioning of all our business processes.”**

## **The Principle**

We place great importance on information security including IT security and data protection, to protect BauWatch against threats and malicious attacks. IT and Data Security is much more than a matter of IT – all of us are asked to use technology in a proper and responsible way and in line with applicable standards. This principle also extends to the use of digital and social media. These new channels allow us to communicate even faster and more effectively – but they also harbor completely new sources of danger. For this reason, we are all called upon to exercise the same caution when dealing with digital and social media.

## **The Purpose**

Attacks have increased in recent years – a downside of digitization. Receiving, processing and passing on information – this forms the basis for all business processes. Internal knowledge must not fall into unauthorized hands and we must ensure that we always have access to the correct and complete information to run the business without interruption and to comply with our financial reporting obligations. Furthermore, responsible use of data and information provided to us by others is a key element to maintain trust. Unintentional copyright infringement, liability and data protection violations can quickly result in legal disputes.

# Responsibility to the environment and communities



**“Our mission is to build sustainable businesses for a future worth living.”**

## **The Principle**

Responsible treatment of the environment and natural resources is a matter of course for BauWatch. We use natural resources appropriately and economically to ensure that our activities have the least possible impact on the environment. We promote environmental awareness in our employees and are committed to the dissemination and application of environmentally friendly technologies. As a responsible member of society, BauWatch donates financial and material resources to education, science, art and culture, as well as social and humanitarian projects. BauWatch does not make political donations (to politicians, political parties or political organizations). We encourage our staff to do volunteer work.

## **The Purpose**

We strongly believe that stopping climate change is the priority task for our generation – and we will do our part. We understand the importance of the part we play in creating a more sustainable future for planet earth. Social engagement helps create a future worth living and supports the communities we operate in. We do not side with any political party but will speak up and make our positions known when and as appropriate.

# Quick ethics check



**Keep our values  
in mind when  
asking yourself  
these three  
questions.**

## **Is it legal?**

This goes right to the core of the matter. Does it violate law, our policies or this Code of Ethics – or does it feel like it might? If the answer is yes or possibly, the action should definitely not be taken. Talk to your Legal or compliance colleague about next steps.

## **Is it fair and balanced?**

Although we compete for success and want to win commercially, we should avoid great imbalances or unfairness of our actions in favor of long-term relationships and mutual respect.

## **How will it make us feel about ourselves?**

How would the decision align with our own sense of right and wrong? Could we explain it to someone else in just one sentence? Would we feel proud of the decision we made when our actions were on display for others to see?





## Contact

If you have any doubts about the right course of actions, or you have questions or comments, please feel free to contact the following colleagues:

## Your direct manager

**The Group Compliance Officer**  
jzuidgeest@bouwatch.nl

**The Group Legal Counsel**  
mvantriet@bouwatch.nl