



Authority: Compliance Manager
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Code of Conduct Policy

CODE OF CONDUCT

Introduction

Vesper's ability to act as a responsible and professional company and business-partner depends largely on its employees' and consultants' ability to up-hold and promote the highest standards and ethics in their daily work and behaviour. All Vesper's employees and consultants are collectively responsible to adhere, maintain, and continuously improve these standards. Managers have a responsibility to set good examples, encourage and ensure compliance with this Policy in order to contribute to a good working environment for employees, consultants, sub-contractors, partners, and clients.

This Policy is intended to act as a guide for employees and consultants to make ethical and professional decisions in their professional, and at times private, lives and is designed to assist in understanding obligations and responsibilities placed on employees and consultants when working on behalf of Vesper. The policy builds on, and complies to, the International Code of Conduct for Private Security Providers.

Adherence to this Policy and the International Code of Conduct will contribute to minimizing negative impact on the surrounding environment and communities in which Vesper operates, to responsible provision of security services, and to support a high public profile and solid reputation of Vesper.

Core Values and Guiding Principles

Whilst working on behalf of Vesper it is of utmost importance for all employees and consultants to respect and adhere to the following core values and guiding principles:

General behaviour and conduct shall reflect and adhere to the universal values of the United Nations, as described in the Universal Declaration of Human Rights, including respect for human rights, human dignity, equal rights for men and women, non-discrimination, social justice and security.

Compliance with national laws and regulations in the countries where Vesper operates.

Exercising restraint and caution in a manner consistent with applicable international guidelines regarding the use of force, including the UN principles on the Use of Force and Firearms by Law Enforcement Officers and the UN Code of Conduct for Law Enforcement Officials, as well as best practice developed by companies, civil society organizations and governments.

Compliance with Vesper's instruction regarding the Rule for the Use of Force.

Compliance with and respect for the labour-conventions as established under the leadership of the International Labour Organization (ILO), including the fundamental ILO conventions (freedom of association and protection of the right to organize, abolition of forced labour, minimum wage, worst forms of child labour, non-discrimination etc.)

Support of the ILO-driven principle to promote opportunities for men and women to obtain decent and productive work in conditions of freedom, equality, security and dignity.

At all times maintain the highest degree of professionalism, ethics and integrity.

Demonstrate discretion and maintain confidentiality as required.

Establish and maintain constructive, professional and respectful working relations within Vesper, with partners and subcontractors, with clients, also taking into account external stakeholders such as local communities and environment in which Vesper operates.

Prevent and oppose all forms of exploitation of vulnerable individuals and the abuse of power.

Ensure that all activities are in full compliance with international standards and ethics and will not contribute to any harmful or criminal event or practice.

Promote and strive for an environmental friendly approach including considering environmental friendly technologies and materials, recycling policies and practices, and less harmful working methods to minimize impact on the environments and its resources.

Commitment of Employees and Consultants

As an employee or consultant of Vesper I hereby commit myself to:

Uphold the integrity of Vesper by ensuring that my personal and professional behaviour follows highest standard. I will abide to national law and legislation of the country in which I work without taking any personal advantage or misuse any privileges in the name of Vesper.

My work, actions and behaviour demonstrate the spirit of the universal values of human rights, equality, and non-discrimination. I will perform my official duties and personal affairs in a way that avoid any conflict of interest for Vesper, thereby ensuring that Vesper maintain a high public profile.

I will actively contribute to a respectful and constructive working environment built on team spirit, open communication and dialogue.

I will oppose and take action against any kind of harassment in the workplace, including discrimination, sexual harassment, and abuse of power.

I will comply with all staff regulations that concern my health, safety and security.

I will not take part in any unethical and criminal activity, thus compromising the image and interest of Vesper. This includes for example exploitation of vulnerable individuals for labour and/or sexual and other purposes, human trafficking, child labour, and sexual relationships with children under 18 etc.

I will ensure full respect for colleagues, partners, sub-contractors and clients, and not disclose any confidential or sensitive matter as requested.

I will treat all colleagues, partners, sub-contractors, and clients with the outmost respect and professionalism, and ensure a spirit of equality, efficiency, and timeliness.

I will not contribute in any way to acts of corruption, bribery and unfair competition in any country in which Vesper do business.

I will make effort to use and promote environmental friendly technologies, materials, practice and working methods in order to minimize the environmental impact and preserve resources.

Responsibility and Compliance

All Vesper employees and consultants are responsible for upholding and complying with the Vesper Code of Conduct, and Vesper expects all employees and consultants to understand, respect and adhere to the Code of Conduct:

All current and new employees and consultant at Vesper will be required to read and sign the Code of Conduct.

All Vesper employees and consultants are responsible to adhere to the Code of Conduct while in the service of Vesper.

All signed agreements with a consultant or employee will have the Code of Conduct as an annex, and Vesper's Business Area Managers have a responsibility to ensure that all consultants fully understand the content and the spirit of the Code of Conduct and expectations from Vesper on their compliance.

All **breaches** of the Code of Conduct by Vesper employees shall result in corrective actions. The staff will be fully informed of the reasons for the corrective actions. Repeated and/or serious breaches of the Code of Conduct might result in dismissal from employment.

Any breach of the Code of Conduct by a consultant shall result in corrective notifications and communication. Repeated and/or serious breaches might result in discontinued cooperation.

All Vesper employees and consultants have a responsibility and obligation to report to his/her supervisor in event of a) any uncertainty around or suspicion of misconduct and/or breach against the Code of Conduct by colleagues, partners and sub-contractors; b) any misconduct and/or breach against the Code of Conduct by colleagues, partners and sub-contractors.

All Vesper employees agree to participate in any internal and external investigations as well as in any public investigations conducted by competent authorities when asked.

All Vesper employees and consultants have a responsibility and obligation to report to his/her supervisor all potential or actual human rights abuses, or national or international crimes. Suspicion or knowledge of the commission of war crimes, crimes against humanity, genocide, enforced disappearance, forced or compulsory labour, hostage-taking, sexual or gender-based violence, human trafficking, trafficking of weapons or drugs, child labour, and extrajudicial, summary, or arbitrary executions shall be reported. Supervisors shall report the incident to Vesper head office, and to one or more of following competent authorities: in the country where the act took place, the country of nationality of the victim, or the country of nationality of the perpetrator.

Signature

By signing this Code of Conduct I am attesting that nothing in my present or past conduct contradict Vesper CoC, and I will notify Vesper of any change of circumstances that might lead to a review of my screening status.

I have taken part of and fully understand the Vesper Code of Conduct including applicable external reference documentation. I understand that any breach of the Code of Conduct may lead to dismissal of my employment. Hereby, I ensure that I will comply with the Vesper Code of Conduct during my employment with Vesper.

Signature of employee_____Date_____

Printed name of employee_____