

# Supplier Code of Conduct

Thank you for being a trusted Genetec supplier! At Genetec, we work hard to do our part in fostering a responsible and prosperous business environment for all. Being dedicated to the highest standards of ethics, we want to collaborate with all suppliers and other parties supplying goods or services to us (each a “**Supplier**”) in building a fairer and more responsible world.

The purpose of this document (the “**Code**”) is to set out a set of core rules and principles that we believe any responsible business must adopt, and we count on our Suppliers to do their part by adopting and applying them in the conduct of their operations. Our Suppliers are further expected to hold their own supply chain partners to the same standards.

The obligations contained in this Code are not exhaustive and Suppliers are expected to adopt comprehensive practices with regards to all subject matters covered below in all relevant aspects of their business.

## 1. Compliance with laws

We expect our Suppliers to comply with all laws and regulations applicable to their business. This obligation extends to all areas of their operations, in all regions where they have a presence, at all times.

## 2. Human rights

### Slavery and human trafficking

The Universal Declaration of Human Rights (**UDHR**), and other similar acts, such as the *UK Modern Slavery Act 2015* and the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* of Canada, recognize the inherent dignity and worth of the human person. Genetec is committed to upholding these fundamental instruments and the worldwide common standards they set for the protection of human rights. We trust our Suppliers to remain diligent and implement appropriate measures to ensure that no form of slavery, forced labor or human trafficking takes place in their operations as a key part of their compliance obligations.

### Child labor

Every child deserves to grow up in peace, freedom and equality. Children require special protection and care. Genetec is committed to the fight against child labor and we expect our Suppliers to do their part in a manner consistent with the principles outlined in the United Nations Convention of the Rights of the Child, in the UDHR and in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* of Canada.

## 3. Safe work environment

### Discrimination in the workplace

The diversity of Genetec employees is a powerful asset and we are firmly committed to providing equal opportunity in all aspects of employment to all employees and candidates. Employment decisions are based on merit, qualifications and abilities and we do not discriminate in employment opportunities or practices on the basis of race, color, nationality, disability, religion, gender, sexual orientation, age, or any other characteristics protected by law, nor do we tolerate any such discrimination. We trust our Suppliers to work towards maintaining a fair work environment, free of any form of discrimination.

### Harassment in the workplace

Genetec is committed to providing a work environment in which individuals are treated with dignity and respect, and we expect our Suppliers to maintain a work environment free of threatening, intimidating or aggressive behavior, bullying, subjecting to ridicule or sexual harassment.

## Employee safety

We take the health and safety of our personnel with the utmost seriousness, and so should our Suppliers. We expect our Suppliers to implement appropriate policies and practices (including safety training, proper handling of hazardous materials and prohibiting the use of mind-altering substances while at work) to protect the health and safety of their personnel and contractors.

## Work conditions

Genetec believes that work conditions greatly affect the lives of individuals. An adequate living wage and a reasonable number of working hours contribute to reducing overall inequality, instability, and poverty. We count on our Suppliers to build and promote a work environment providing adequate working hours, equitable wages, overtime pay, necessary time off, paid leaves and holidays.

## 4. Ethical business practices

### Fraud and dishonesty

Integrity and honesty are at the core of Genetec values. Any type of dishonest or fraudulent behavior will not be tolerated. Suppliers are expected to uphold these fundamental ethical standards and act accordingly.

### Anti-corruption

Corruption is the misuse of decision-making authority for private gain, typically involving bribery, both in the private and public sectors. The act of bribing can be defined as a promise or actual grant of an incentive to a person in a position of authority to obtain an advantage in return. Whether in a direct or indirect manner, those practices undermine good governance and competitive business conditions. These incentives include, but are not limited to, making (or promising to make) cash payments, employment opportunities (including for relatives), unjustified consulting contracts, political contributions, charitable contributions, gifts, and paid travel or other entertainment. Each of us needs to do our part in combating such dishonest practices in a manner compliant with the applicable anti-bribery regulations, including, without limitation, the U.S. *Foreign Corrupt Practices Act*, the *Corruption of Foreign Officials Act of Canada* and the *Bribery Act 2010* of the U.K. Suppliers are expected to uphold this commitment by preventing and eliminating all forms of corruption and embezzlement in their business conduct. They must further avoid seeking competitive advantages through illegal or unethical business practices.

### Fair competition

Genetec believes that competition and anti-trust laws are necessary for an open and fair marketplace. All businesses must avoid the formation of monopolies and cartels and must not engage in any form of collusion. To promote healthy competition within this industry, Suppliers are expected to act in a manner compliant with all applicable fair competition and anti-trust laws, and must not engage in collusive bidding, and other similar prohibited activities.

### Conflict of interest

A conflict of interest occurs when personal interests, or those of a third party (including close relatives), interfere – or appear to interfere – with business practices or transactions. While some conflicts are clear-cut, others are less obvious. For example, a Supplier's employee or representative having a close personal relationship with a Genetec employee which could affect dealings between the two organizations, may constitute a conflict of interest. Suppliers must avoid all conflicts of interests, apparent and actual, and need to adopt policies and practices to avoid such a predicament, as it would impair fair and honest business dealings with Genetec. Suppliers must notify us in writing immediately upon becoming aware of any apparent or actual conflict of interest so that appropriate procedures may be put in place.

## Environment

The future and the well-being of our planet are important issues for Genetec. We all have a role to play in this effort. We encourage our Suppliers to assess and work towards mitigating the environmental impact of their operations. Tackling pollution, gas emissions, use and preservation of water, as well as a proper waste disposal management are just a few examples of actions our Suppliers should consider taking to do their part. Furthermore, Genetec expects its Suppliers to align their business activities and key decisions with environmental, social and governance (ESG) strategies by establishing an audit committee responsible for conducting regular internal ESG risk assessments and to integrate ESG initiatives in their corporate strategies and operations.

## Protection of Identity and Non-Retaliation

Genetec believes that Suppliers' employees should be able to raise concerns or cooperate with internal investigations or audits without fear of retaliation. Therefore, Suppliers must provide their employees with an anonymous mechanism to submit complaints, concerns, or reports of potential ethical violations in the workplace or other workplace grievances. Suppliers must ensure the confidentiality, anonymity, and protection of employee whistleblowers, unless prohibited by law, and prohibit retaliation against them.

## Political Contributions

Suppliers may not make any political contributions or engage in lobbying or political campaign activities on behalf of Genetec and shall not give the impression that Genetec endorses any political candidate, elected official, political party or campaign. Genetec will not tolerate the use of its assets, facilities, equipment, or trademarks in connection with the Supplier's political activities or communications with governments.

## 5. Intellectual property

Intellectual property (which includes, without limitation, patents, copyrights, trademarks and trade secrets) is a valuable asset for businesses. Suppliers are expected to implement appropriate measures to prevent any infringement or misappropriation of intellectual property of others, including Genetec.

## 6. Personal data protection

Privacy is a fundamental human right, and we are committed to protecting personal data of all individuals, including that of our employees, candidates, customers and other partners. In addition to complying with applicable laws, Genetec maintains strict internal policies, leverages industry-leading technologies and subjects itself to demanding industry standards to uphold this commitment and protect personal data entrusted to us. Suppliers are required to implement and continuously maintain appropriate administrative, technical and physical controls consistent with industry best practices to protect personal data against unauthorized access or use in a manner that meets or exceeds the requirements of the applicable data protection laws. Each Supplier must immediately notify Genetec in writing upon becoming aware of any actual or suspected incident involving any personal data associated directly or indirectly with Genetec, our customers or partners. All such notifications must be sent to both [security@genetec.com](mailto:security@genetec.com) and [legal@genetec.com](mailto:legal@genetec.com).

## 7. Auditing and Reporting

Suppliers must be committed to ensuring their compliance with this Code and all laws and regulations applicable to their operations and products. Suppliers must report, without delay, any ethics and compliance-related breach of this Code and related policies and standards to Genetec by email to [SupplierOnboarding@genetec.com](mailto:SupplierOnboarding@genetec.com).

Any questions or concerns regarding this Code or a Supplier's compliance with its commitments above should be sent to [SupplierOnboarding@genetec.com](mailto:SupplierOnboarding@genetec.com).