

## **Corporate Social Responsibility Policy(CSR) Solid Security Sp. z o.o.**

The policy applies to Solid Security Sp. z o.o. and to all companies providing services on behalf of Solid Security Sp. z o.o

APPROVED BY:

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Edition III (the previously applicable Corporate Social Responsibility policies of Solid Security Sp. z o. o. have been incorporated)

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## Foreword

Since 1991, the inception of our company, Solid Security Ltd. aspired to become the leading provider of security services for people and property in Poland. At the core of this vision lies the belief that achieving this goal is possible by offering our clients services of the highest standards, meeting their ever-growing demands and expectations. Our organisation has diligently pursued and continues to pursue meeting these standards, including by implementing successive certified management systems complying with ISO 9001, ISO 14001, ISO 45001, ISO/IEC 27001 standards, as well as NATO's AQAP 2110 standard, embracing the principles of corporate social responsibility and sustainable development, and leveraging the latest technologies to ensure the safety of all stakeholders.

The scale and diversity of the security-related initiatives we undertake for our clients across Poland give us a tangible and significant impact on the environment, which we consciously seek to shape. We increasingly focus on ensuring proper working conditions, addressing social issues, minimizing negative environmental impact, upholding business ethics, and positively influencing our stakeholders, including suppliers, business partners, and other interested parties, thus building a chain of shared values. We assess our impact, optimize the use of natural resources and raw materials, and set ambitious goals for the future.

Our commitment to ensuring the safety of our clients and promoting sustainable development is a key element of Solid Security Sp. z o.o.'s strategy, based on four pillars: environment, human rights and labor rights, ethics, and sustainable procurement. This document - Solid Security's Corporate Social Responsibility (CSR) Policy - sets the standards for our conduct and our commitments in these areas.

The documentation regarding Solid Security's CSR Policies applies to Solid Security Sp. z o.o. as well as all subsidiary companies. Solid Security ensures that no Employee who reports violations of Solid Security's Policies in good faith will suffer adverse consequences as a result.

The organization complies with applicable legal regulations and other requirements concerning environmental protection, occupational health and safety, among others, to which we are obligated to adhere.

This CSR Policy has been developed based on both national regulations and international standards applicable in this area. We commit to actively and consistently comply with both national and international regulations concerning responsible business conduct and sustainable development, which include issues related to human rights, labor, environmental protection, and anti-corruption measures at all levels of our operations, including but not limited to: International Labour Organization (ILO) conventions, the Universal Declaration of Human Rights by the UN, the 10 principles of the UN Global Compact, and other applicable principles in this regard. We aim to create an environment that promotes the dignity of every individual, eliminates discrimination, and supports sustainable social, economic, and environmental development, in line with international standards and values.

The highest management maintains and continuously improves an integrated quality management system, meeting the requirements of ISO 9001:2015 and AQAP 2110:2016, environmental requirements meeting ISO 14001:2015, occupational health and safety



requirements meeting ISO 45001:2018, and information security requirements meeting ISO/IEC 27001:2022.

## Human Rights and Labour Rights

The care for employees, partners, and stakeholders is one of the fundamental values of Solid Security Company. Its basis is respect for human rights and labour rights. Each stakeholder should be treated with respect and honesty. It encompasses all aspects of employment relationships, career management, diversity, and equality, as well as human rights and relationships with external stakeholders.

Solid Security strives to create an environment where there is no place for threats to the safety, health, and well-being of all individuals working for the company. We are all responsible for our own safety and that of others. We aim to prevent and eliminate behaviours of bullying and/or discrimination in employee relations, ensuring the health, safety, and well-being of employees, and promoting ethical work standards in our Organization.

1. Each employee of the company is subject to employment in accordance with the applicable Polish law. Solid Security operates, in particular, in accordance with the provisions of the Labour Code, Civil Code, and the Law on the Protection of Persons and Property. Any actions contrary to them are unacceptable.
2. Employment contracts are transparent and understandable, developed in accordance with the Labour Code and applicable legal regulations. Termination of employment contracts takes place with observance of the established notice period.
3. Employees have the right to associate, conclude labour agreements, and have their complaints fairly considered.
4. Employees cannot be exposed to work in conditions endangering their safety or health.
5. Recruitment processes for the company and cooperating entities are conducted by internal Recruitment Department employees.
6. In order to recruit candidates for employment, publicly available methods are used, including: job postings on the Internet, in the press, cooperation with Career Offices of universities and higher education institutions, vocational schools, labour offices, companies conducting vocational training, employee referrals, etc.
7. Recruitment decisions are made solely based on the candidate's qualifications and objective criteria specified by the employer.
8. Candidates undergo formal and practical verification before formal employment, conducted by designated supervisory employees, whose task is to assess the candidate in terms of specific job requirements or requirements specified by the contractor.
9. Solid Security guarantees employees the opportunity to enhance their knowledge, qualifications, and level of safety through training programs.
10. Employees are provided with safe and hygienic working conditions to prevent accidents and injuries in the workplace as well as occupational diseases. The main activities are aimed at eliminating hazards and reducing risks.
11. In concern for the health and safety of employees, Solid Security has implemented and continuously improves a safety and health management system in accordance with ISO 45001:2018.
12. Employees or their representatives are guaranteed consultations and participation in activities aimed at improving OHS conditions. The Solid Security Management Board



has established a Health and Safety Committee, which as an advisory and opinion-forming body has a significant influence on shaping a safe working environment. Conclusions from regular meetings are presented to the Management Board.

13. Solid Security is committed to combating discrimination in employment, especially based on gender, age, disability, race, religion, nationality, political beliefs, union membership, ethnic origin, religion, sexual orientation, as well as employment status and type of employment contract.
14. In order to clarify behaviours related to discrimination, bullying, or harassment in the workplace, Solid Security has established an Anti-Discrimination Committee.
15. The principle of reporting prohibited behaviours and the operation mode of the Anti-Discrimination Committee have been specified by Solid Security. Prohibited behaviours and the Procedure for reporting them are attachments No. 1 and 2 to this policy.
16. An employee should not accept discriminatory, harassing, or bullying behaviours towards themselves or others.
17. An employee should avoid behaviours described as prohibited behaviours, which they have become acquainted with and confirmed by their own signature.
18. An employee who encounters discriminatory, harassing, or bullying behaviours towards themselves or others should report this fact using the procedure specified by Solid Security in attachment No. 2 to this policy.
19. Solid Security adheres to the principle of "Zero Tolerance for Child Labour and Forced Labour".
20. Solid Security does not employ or utilize the labour of children under the age of 15. It is permissible to employ a minor who has completed their 15th year of age but has not exceeded 18 years of age if they have completed at least primary school and present a medical certificate stating that the type of work does not endanger their health. A young employee, without vocational qualifications, may be employed solely for vocational training purposes, to perform light work that does not endanger their life, health, and development. The working time of a young employee may not exceed 8 hours per day and must take place between 8:00 PM and 6:00 AM. A young employee is entitled to at least 48 hours of rest per week, including Sunday. Due to the nature of the work and the profile of Solid Security's activities, the company primarily employs individuals who have reached the age of 18.
21. Solid Security does not collaborate with Clients, Contractors, or Suppliers who violate regulations related to child labour and minors. It collaborates with external Stakeholders and builds ethical and lasting relationships with partners and suppliers who adhere to similar principles as Solid Security.
22. Human Rights Protection at Solid Security focuses on compliance with international human rights standards, legal regulations, and other human rights aspects, including labour law and OHS.
23. Promoting Diversity and Equality at Solid Security involves creating inclusion and equal opportunities for all employees.
24. Solid Security ensures ethical working conditions, including fair wages, decent working conditions, and equal treatment.
25. Combating discrimination and promoting equality at Solid Security involves active actions for diversity and equality in the workplace.

#### Quantitative and Qualitative Objectives to Achieve by 2030:

1. Maintain a zero level of fatal, collective, and serious accidents in the workplace.
2. Reduce workplace accidents: Goal: 50% reduction in workplace accidents over the next 7 years.

3. Ensure an open and safe communication environment: Striving to create an open and trusted environment where employees can freely lodge complaints and report incidents without fear of reprisal or inappropriate employer response.
4. Effective response to complaints and reports: Ensuring that each complaint or report is thoroughly investigated and resolved, and that the employee receives feedback on the actions taken in response to their complaint.
5. Ensure fair and ethical compensation for work performed by employees: Measure and take action to minimize the gender pay gap. Consistently and systematically determine the level of fair pay, which covers basic living needs and is fair in relation to ethical standards.
6. Reduce wage differentials: Reduce the gap between the highest and lowest salaries in the Organization.
7. Establishing a human rights risk list by 2025 and its annual update, and taking action to mitigate identified risks.
8. Developing employee competencies and skills: Ensuring that employees have access to relevant training and development programs that help them develop their skills and competencies according to the Organization's needs and their own career aspirations.
9. Increase the number of trained or promoted employees: Increase employee engagement by offering them opportunities for career advancement and development within the organization.
10. Training and development programs: Expand the training offer for employees on key company issues and achieve a minimum of 10 hours of training per employee per year.
11. Training and development programs: Goal: 100% of employees participating in at least one training session per year.
12. Promoting diversity and equality: Goal: Increase the participation of women and minorities in managerial positions to 30% by 2030.
13. Ensure a healthy work-life balance: Striving to create a work atmosphere that enables employees to maintain a balance between professional responsibilities and personal life. Limiting overtime to a maximum of 100 hours per year will improve the quality of life for employees.
14. Promote a work-life balance culture where employees achieve a level that meets their needs and expectations for balancing work and personal life.
15. Regular workplace inspection by the OHS Service and conducting at least 4 workplace meetings and inspections per year by the OHS Committee.
16. Ensure professional OHS management: The OHS Committee operates in a professional and effective manner. 100% of the OHS Committee members are adequately trained in monitoring, reporting, and resolving OHS issues in our Organization.
17. Ensure awareness and understanding of equality principles and non-tolerance of harassment and discrimination: Striving to create an organizational culture where all employees understand and adhere to equality principles and do not tolerate discrimination and harassment. Goal: 100% of employees trained by the end of 2025.

Review Mechanism - Implementation and Monitoring 1/year - Annual CSR Report: Engagement of all Organization departments in implementing CSR Policy. Regular reviews and updates will be conducted to assess effectiveness and make necessary corrections.



## Environment

Solid Security aims to reduce its negative impact on the natural environment. Responsible environmental stewardship is achieved through the pursuit of new, low-emission technologies and ensuring sustainable use of natural resources in the long term in its own operations and value chain. Making corporate social responsibility principles and sustainable development an integral part of every decision is an opportunity to adapt our resource utilization practices more responsibly. This includes both our internal operations and the entire supply chain.

1. In the environmental domain, Solid Security complies with applicable legal requirements and other relevant regulations and commitments.
2. Solid Security strives to minimize its negative impact on the natural environment, including reducing air pollutants and emissions and decreasing fuel and energy consumption, thereby reducing its carbon footprint.
3. Solid Security has identified significant environmental aspects in accordance with ISO 14001:2015, and all actions are implemented with consideration for these aspects.
4. Solid Security commits to continuously monitor environmental impacts to reduce natural resource consumption, such as fuel and energy.
5. Efforts in energy efficiency focus on implementing energy-saving technologies.
6. Actions are taken to effectively manage waste and promote recycling.
7. Sustainable environmental impact involves planning and delivering services in an environmentally friendly manner.
8. Education and awareness efforts involve informing employees, clients, and all stakeholders about sustainable practices and the environmental impact of Solid Security's activities.
9. Regarding identified significant environmental aspects such as fuel consumption and emissions from combustion, actions have been taken to maximize remote meetings as an alternative to travel. Public transportation is encouraged as a means of transportation during business trips, where practical and available.

### Quantitative and Qualitative Objectives to Achieve by 2030:

1. Reduction of CO2 Emissions from the vehicle fleet by 30% compared to 2021, calculated per unit of revenue.
2. Decrease the overall greenhouse gas emissions in scope 1, 2, and 3 by 20% compared to 2021, calculated per unit of revenue. This goal will be achieved through fleet reorganization and modernization, along with specific actions and investments to increase the use of renewable energy. Additionally, enhanced collaboration with partners will aim at a joint approach to sustainable development goals to achieve an effect in scope 3.
3. Limit the amount of generated waste by 10% and increase the recycling rate by 10% compared to 2021, relative to revenue.
4. Increase employee awareness regarding waste management - ensuring that employees understand the importance of waste segregation and the benefits of regenerating and reusing IT equipment. 100% of employees trained by 2025.
5. Waste Recycling - Achieve a 50% waste recycling rate by 2030.
6. Energy Consumption: Reduce energy consumption by 20% by 2030 relative to revenue.



7. Ensuring customer understanding of emission offsetting - educating and informing customers about the benefits of emission offsetting and encouraging their participation in these activities. Conducting 1 educational campaign per year.

Review Mechanism - Implementation and monitoring annually: Engagement of all organization branches in policy implementation and achievement of established goals.

## Ethics

Ethical principles form the foundation of all daily business activities at Solid Security. This means that not only our employees but also our business partners must engage in activities and commitments that enable the maintenance of high ethical standards in the workplace. At Solid Security, we adhere to a zero-tolerance policy for corruption, which is deemed unacceptable in any form. We expect all stakeholders to comply with all applicable laws, regulations, and other contractual requirements, including, among others, confidentiality and intellectual property rights, data protection and privacy, compliance with international trade principles, as well as licenses and permits.

1. In terms of ethical and information security issues, Solid Security complies with applicable legal regulations and other relevant requirements and commitments.
2. The company adheres to business ethics principles and does not tolerate corrupt practices. Documentation provided to external partners is always accurate.
3. Solid Security expects all employees at all levels to set a good example and ensure compliance with legal requirements and ethical standards.
4. Aspects of the company's operations related to society are conducted transparently.
5. The company owner, management, and employees, guided by personal values and a sense of responsibility, perform their tasks in an ethical, honest, diligent, and credible manner without accepting or giving benefits that could influence decision-making.
6. Giving or receiving gifts exceeding 50 PLN is considered unacceptable. Monetary means or equivalents cannot be considered as gifts either.
7. Solid Security takes responsibility for its impact on the environment and declares readiness to withdraw from erroneous decisions and assume responsibility for any damage caused.
8. All individuals employed at Solid Security, regardless of their form of employment and job role, are bound by the Code of Ethics. Each employee confirms their familiarity with it and commitment to adhere to it.
9. Solid Security undertakes to raise awareness among employees about combating corruption.
10. Solid Security expects individuals in managerial positions to ensure that employees are knowledgeable about their positions and the principles regarding combating corruption.
11. Employees from groups identified as particularly exposed to corruption must familiarize themselves with the necessary documentation and sign a statement confirming their commitment to comply with it.
12. Failure to comply with anti-corruption principles may result in internal disciplinary proceedings and termination of employment.
13. In case of observing corrupt behaviour, an employee should follow the procedure specified in the Procedure for Reporting Prohibited Behaviours, attached as Annex 2 to this Policy.

14. Solid Security guarantees confidentiality, availability, and integrity of the information it possesses.
15. Information security is integrated with business and strategic processes.
16. All information is protected against accidental and intentional threats.
17. The company promotes a culture of security among all employees, collaborators, and business partners.
18. We also commit to ensuring the privacy and data security of the individuals we collaborate with.
19. Legal requirements and internal regulations concerning data protection aim to prevent crimes related to identity theft, fraud, and other forms of cybercrime.
20. Solid Security maintains and improves an information security management system in accordance with the international standard ISO/IEC 27001:2022 and strives for continuous improvement of the implemented solutions, based on stakeholder feedback, analysis of security events and incidents, audit findings, and system reviews.
21. Solid Security respects and protects confidential information concerning its employees, suppliers, business partners, and competitors.
22. Employees undergo regular training in information security.
23. Suppliers and business partners are required to meet the standards of ethics and information security applicable at Solid Security.

#### Quantitative and qualitative goals to achieve by 2030:

1. Providing knowledge within the organization on ethical issues - Ensure that 100% of employees receive training annually.
2. Verification of the effectiveness of the procedure for reporting violations (complaints) at least once a year.
3. Maintaining a zero level of incidents related to information security and data protection.

Review Mechanism - Implementation and monitoring once a year Annual CSR Report: Involvement of all Organization departments in policy implementation.

## **Sustainable Purchasing**

This policy outlines the principles and purchasing practices aimed at minimizing negative environmental impact, promoting social responsibility, and ensuring ethical and fair working conditions throughout the supply chain.

Solid Security values good business relationships based on constructive dialogue, professionalism, partnership, and business ethics. Suppliers located throughout Poland provide uniforms and equipment for security personnel, as well as other materials necessary for the effective provision of security services. Among these suppliers are companies and institutions providing access to media, telecommunication services, advisory firms, insurance companies, and banks. We engage in both short- and long-term agreements with them.

Because safe, efficient, and innovative suppliers are strategically important to us, it is crucial for them to maintain high standards in their operational activities and value chain.

Our sustainable purchasing policy is based on ethical principles and aims to ensure that the suppliers and business partners we work with also adhere to these same values.



1. Our company is committed to providing a workplace free from corruption, bribery, harassment, and discrimination. These behaviours are absolutely unacceptable and constitute a violation of our values and business ethics principles. We encourage all employees, suppliers, and other stakeholders to report any suspicions or incidents related to these behaviours.
2. Solid Security expects all suppliers, their employees, representatives, and subcontractors to adhere to the standards applicable within the company.
3. Business partners, when entering into cooperation with Solid Security, commit to complying with the principles outlined in Attachment No. 3 to this Policy - Solid Security Supplier Code of Conduct.
4. Solid Security, to the extent possible, engages in collaboration with local suppliers.
5. The organization conducts systematic evaluation and careful selection of suppliers of goods and services, considering both quality and aspects related to ensuring employee safety and environmental responsibility.
6. We identify minority suppliers who also meet our procurement requirements. We prefer suppliers who are minorities or employ individuals with disabilities, of different genders, nationalities, and any other underrepresented groups in supply chains. We conduct this identification through market research, collaboration with organizations supporting these groups, and participation in industry fairs and events.

#### Quantitative goals to achieve by 2030:

1. Supplier Awareness and Education: Ensure that 100% of active suppliers accept the provisions of the Solid Security Supplier Code of Conduct, informed and educated about the current CSR principles adopted by Solid Security.
2. Reduction of Packaging Waste: Decrease the amount of packaging waste by 30% relative to the volume of purchases.
3. Energy Efficiency: Achieve a procurement level of 50% energy-efficient products and devices.
4. Support for Local Suppliers: Source a minimum of 40% of purchases from local suppliers.
5. Recycling and Reuse: Attain a 60% recycling and reuse rate of materials.
6. Increase in Environmental Certifications: Increase the percentage of suppliers with environmental certifications by 20%, indicating suppliers who possess ecological certifications or meet specified environmental standards.
7. ESG Reporting: Reach 100% of suppliers reporting ESG indicators according to generally accepted standards and prefer suppliers continuously improving their ESG performance.

#### Qualitative goals:

8. Ethical Sourcing: Collaborate exclusively with suppliers that meet ethical standards defined by Solid Security.
9. Education and Awareness: Conduct annual training sessions for employees on sustainable purchasing practices.
10. Innovation and Improvement: Perform an annual review of procurement processes to identify opportunities for innovative solutions and update the CSR risk list concerning sustainable supply chains.
11. Transparency and Accountability: Implement a monitoring and reporting system to track progress towards achieving goals.



12. Stakeholder Engagement: Hold regular meetings with suppliers, customers, and employees to raise awareness of CSR issues.
13. Sustainable Supply Chain: Develop and maintain a sustainable supply chain that considers environmental aspects, such as reducing greenhouse gas emissions and minimizing resource consumption.
14. Implementation of Supplier Monitoring and Auditing System: From 2024 onwards, implement a system to monitor and audit suppliers for compliance with labour rights and civil liberties.
15. Implementation of Supplier Training Program: From 2026 onwards, introduce a regular training program for suppliers on business responsibility and human rights.

Goals related to suppliers in the context of labour rights and human rights:

16. Fair Working Conditions: By the end of 2024, achieve a 100% rate of suppliers meeting labour standards, including fair compensation for workers.
17. Zero Tolerance for Child Labour and Forced Labour: Implement a policy prohibiting child labour and forced labour in all forms of cooperation. Refrain from engaging with suppliers who do not adhere to this policy, and promptly report any indications of non-compliance to relevant authorities and institutions.
18. Promoting Equality and Non-Discrimination: Expect 100% of suppliers to declare their commitment to equality and non-discrimination in employment and business practices.
19. Building Awareness in the Supply Chain: Encourage our suppliers to identify and collaborate with their own suppliers who prioritize sustainable sourcing issues.

Review Mechanism - Implementation and Monitoring:

Conduct annual reviews and updates to assess effectiveness and make necessary corrections, involving all departments of the organization in policy implementation. Regular reviews and updates will be conducted to assess effectiveness and make necessary corrections.

## **Anti-Corruption, Money Laundering, and Conflict of Interest**

This policy aims to promote transparency, ethics, and legal compliance in our organization's activities, preventing corruption, fraud, money laundering, and managing conflicts of interest.

The principles applicable at Solid Security are:

1. Zero tolerance for corruption, fraud, and money laundering.
2. Ensuring compliance with national and international law.
3. Transparency and conflict of interest management.
4. Prohibition of bribes and illegal corrupt practices.
5. Conflict of interest management - all conflicts of interest must be disclosed and appropriately managed.
6. Fraud prevention and money laundering prevention, meaning strict adherence to procedures preventing financial fraud and money laundering.
7. Due diligence and risk assessment regarding contractors and partners.
8. Employee training and awareness - education on anti-corruption, fraud, money laundering, and conflict of interest.

9. Reporting and alerting procedures - mechanisms for reporting suspicions without fear of reprisal.
10. Ethical risk management - developing and implementing ethical and effective risk management strategies related to money laundering.
11. Ethical culture and compliance - promoting an organizational culture based on ethical principles and legal compliance to avoid money laundering.
12. Transparency and open communication - promoting open communication within the organization, including the ability to report potential fraud cases without fear of reprisals.

#### Quantitative and Qualitative Goals to Achieve by 2030:

1. Maintaining a zero level of incidents and irregularities related to corruption, money laundering, and conflicts of interest.
2. 100% of employees trained - training in anti-corruption, fraud, money laundering, and conflict of interest.
3. Audit and compliance - annual audits ensuring compliance and identifying areas for improvement, followed by actions to address identified improvement opportunities.
4. Transaction control procedures - monitoring and control of all financial transactions.
5. Verification of Suppliers and Business Partners: Due diligence concerning all third parties.
6. Conflict of interest prevention - 100% adherence to guidelines for identifying and managing conflicts of interest.
7. Continuous compliance with antitrust laws, ensuring that the organization operates in accordance with antitrust laws and refrains from engaging in actions that restrict competition. No complaints or reports from competitors regarding unfair practices.

#### Review mechanism - implementation and monitoring once a year - Annual CSR report

### **Attachments**

Attachment No. 1 Prohibited Behaviours

Attachment No. 2 Procedure for Reporting Prohibited Behaviours

Attachment No. 3 Code of Conduct for Solid Security Suppliers