


POLICY TITLE AND NO: 23. Group Fair Competition and Anti-Trust Policy		
OWNER: SVP General Counsel	APPROVED BY: Board of Directors	APPROVED DATE: 200507
TARGET AUDIENCE: All Securitas staff above and including branch manager level		

1 SUMMARY

The Securitas Group is committed to maintaining the highest standards of integrity and compliance with applicable laws, rules, regulations and any codes of conduct in the jurisdictions where it operates.

Securitas believes in a free market for the provision of our services, in a free and fair competitive environment with honest competition based on integrity, product quality, price and customer service. Securitas shall comply with the competition laws of each country it operates in.

Securitas wants to develop the security industry to an industry characterized by competition based on quality and solutions (see further in *the Securitas Toolbox*). However, when doing so it is extremely important to ensure that all contacts with competitors are in accordance with this Policy and legal requirements.

All contacts and socializing with representatives of competitors outside of a formal business context should be avoided.

The following arrangement between competitors are strictly prohibited:

- Price fixing (or the fixing of other terms of sale or purchase)
- Bid rigging
- Dividing markets or customers between competitors
- Boycott companies

Agreeing with (or propose to) competitors to increase prices to reflect wage or cost increases is strictly prohibited!

This Policy is applicable to all Securitas legal entities, employees, directors and officers. Its content shall also be implemented with all business partners and consultants.

Strict compliance with this Policy is mandatory.

Summary of main changes since last revision:

The Policy has been renamed and renumbered from 8.2 to 23. Securitas position on the prohibition of anti-competitive agreements, practices and contacts with competitors has been elaborated on and consequences of violations clarified. A person responsible for Business Ethics compliance shall be appointed in each country and responsibility for implementation and training has been clarified.

2 BACKGROUND AND PURPOSE

This policy (the “**Policy**”) aims to provide Securitas employees around the world with general rules applicable to competition law and prohibitions, as well as with a general guide to best business practices (in the form of a list of practical “Dos and Do not”). However, as there are differences in competition laws around the world, each Country

is responsible for producing a “Country Competition Policy” (as set out below) unless a Country, based on the underlying local laws and regulations, deems this Policy sufficient.

3 MAIN TEXT OF THE POLICY

Securitas believes in fair trade and honest competition based on integrity, product quality, price and customer service. It is Securitas’ firm policy to ensure that its business practices fully comply with the competition laws of each country it operates in.

The purpose of competition law is to maximize consumer welfare by promoting free and fair competition between companies on price, quality and innovation. It is important to remember that competition law prohibits agreements that have either the objective or the effect of preventing, restricting or distorting competition. This means that it both prohibits agreements intended to restrict competition, even if not successful, and agreements that actually restrict competition, even if that is not their intent. In both cases, competition law will be violated.

The consequences of breaching competition laws are very serious and violations of this Policy is never in the best interest of Securitas. Reporting any and all such practices as well as offers or requests will always serve Securitas best interest.

Competition authorities can impose substantial fines, agreements may be rendered void and unenforceable, and legal action from private parties negatively affected by anti-competitive behavior is both common and costly. In the case of criminal violations of competition laws, individuals can be held legally responsible and can face penalties including imprisonment and large financial penalties. In addition, competition law violations can have a significant negative impact on a company’s reputation and brand.

This policy focuses on prohibition against anti-competitive agreements. [Exhibit 1](#) contains information for markets where Securitas could risk being considered dominant, i.e. where the market share of Securitas within a specific market segment or business line exceeds 40%.

Most competition authorities have the power to carry out unannounced inspections at company premises to gather information to help prove the existence of anti-competitive agreements or conduct (often referred to as “dawn raids”). For that reason, the Policy is accompanied by *23.1 Guideline Dawn Raids* to ensure that such are handled in an orderly and efficient manner, in compliance with legal requirements and without prejudicing Securitas’ legal rights.

3.1 PROHIBITION OF ANTI-COMPETITIVE AGREEMENTS OR PRACTICES

3.1.1 General overview

Cooperation or sharing of information between independent companies that has as its objective or effect the restriction of competition, such as a cartel, is prohibited. Therefore all commercial decisions should be made independently by Securitas.

Some types of agreements are always illegal and are strictly prohibited under this Policy. Examples of such agreements include agreements between or among competitors to fix prices, rig bids, allocate clients, divide markets, or boycott companies. Agreements between companies not to hire or recruit each other’s employees, or to fix employee compensation, are also always strictly prohibited.

This prohibition can apply to:

- agreements or the sharing of information between competitors (“horizontal agreements”); and
- agreements or the sharing of information between companies operating at different levels of the market (e.g. suppliers and distributors) and with end consumers (“vertical agreements”).

3.1.2 Dos and don'ts – competitors / horizontal

When dealing with competitors, Securitas should act as follows:

DO:	
	Do proceed carefully when interacting with competitors (meetings, e-mails, phone calls, socializing etc). Be wary about sharing internal information.
	Do react to anti-competitive offers or suggestions to make it very clear that Securitas does not wish to be involved. End the discussion / contact and ensure that your responses are kept on file.
	Do review and evaluate participation in trade association meetings and industry-wide statistic gathering activities.
	Do seek guidance if you are unclear about your competition law responsibilities. Contact a member of the legal team immediately if guidance is needed.
	Do review participation and seek guidance before engaging in a due diligence investigation of a competitor.
	Do document the sources from which you receive any publicly available information about competitors.
DO NOT:	
	Do not discuss any aspect of pricing with competitors. This includes timing, rebates, discounts or any other aspect of prices. The same rules apply to bidding situations.
	Do not discuss sharing clients or volumes or dividing geographic markets with competitors. This includes agreeing not to target / serve a competitor's clients and agreeing not to enter a specific geographic area.
	Do not share commercially sensitive information with competitors – e.g. individual company prices, rebates, credit terms, costs, capacity, sales, market shares, bidding and procurement data, design, production, distribution or marketing plans. Upon receipt of this kind of information from a competitor, respond and object, alert the legal team, and do not circulate the material internally (i.e. ring-fence it). DO NOT act on such information.
	Do not work with a competitor to exclude another technology or competitor from the market.

Do not remain present during meetings when inappropriate discussions take place, even if you are silent. Voice your concerns and leave the meeting. If minutes are being taken, ask that this be recorded. Report the incident to the legal team.

Above all, DO NOT enter into any agreement - formal or informal, written or unwritten - with a Securitas competitor to fix prices (or other terms of sale or purchase), rig a bid, refrain from supplying a product or service, limit quality competition, divide markets or clients, refrain from recruiting or hiring one another's employees, fix employee wages or other compensation, or exclude competing firms from the market.

NOTE: Agreements that could violate competition laws include not only expressly written or verbal agreements, but also tacit or implied understandings. Even if an agreement is not spelled out, an unlawful agreement could still be inferred from circumstantial evidence, such as two competitors having a meeting and then later engaging in parallel conduct.

3.1.3 Permitted cooperation with competitors (subject to conditions)

Clearly, not all interaction between competitors is illegal. Some forms of cooperation are pro-competitive in that they create efficiencies to the benefit of customers. Depending on the circumstances, the following may be permitted:

- collective / joint purchasing agreements; and
- subcontracting agreements

When Securitas is in the planning phase of this kind of project, a competition law analysis is necessary in order to ensure that it is legal. It is mandatory to seek advice from your local legal team before entering into this kind of arrangement.

3.1.4 Trade associations

Securitas wants to develop the security industry to an industry characterized by competition based on quality and solutions (see further in *the Securitas Toolbox*) and is consequently a member of several trade associations and industry organizations. It is acceptable to be part of trade associations and industry organizations, but it is extremely important to ensure that the contacts between competitors in trade associations and industry organizations are in accordance with legal requirements. See further in [Exhibit 2](#).

All contacts and socializing with representatives of competitors outside of a formal business context should be avoided.

3.1.5 Guidance – non-competitors / vertical

In vertical relationships for the purchase or sale of products or services (i.e. with non-competitors) there is more leeway than when dealing with competitors. However, certain key prohibitions remain. As an example; it is prohibited to restrict a distributor's ability to determine its sales price, but it is permissible both to set a maximum resale price and to suggest a recommended resale price. However, any agreement having as its direct or indirect object the establishment of a fixed or minimum resale price is illegal.

3.2 PROHIBITION OF MONOPOLIZATION / ABUSE OF DOMINANCE

It is unlawful for a company with substantial market power to abuse that position. As a result, so-called 'dominant' companies are subject to stricter standards of competitive behavior than other companies.

Securitas does not consider itself dominant in any market. However, in markets or sub-markets where Securitas has a strong position (i.e. a market share exceeding 40%), particular care should be taken to comply with the best practices set out in Exhibit 1.

3.3 GUIDELINES ON DOCUMENT CREATION / MANAGEMENT

In an anti-trust and competition law context, the document management guidelines in Exhibit 3 should be kept in mind, in addition to Securitas' more general policy on this area.

3.4 MERGER CONTROL

While the merger control rules are not discussed in detail in this Policy, it should be noted that competition authorities are also tasked with investigating mergers and acquisitions which, due to their size or nature, have the potential to restrict competition. Where Securitas wishes to acquire or sell a business, or even enter into a joint venture agreement with another company, it may be necessary to obtain the approval of one or more competition authorities before the deal is implemented. It is therefore important to consult the legal team whenever such a transaction is contemplated.

4 APPLICABILITY

It is important to stress that this Policy is applicable to all Securitas entities, employees directors and officers and shall be communicated and implemented, to the greatest extent possible, with all business partners and consultants.

5 IMPLEMENTATION AND RESPONSIBILITY

A person responsible for Business Ethics compliance shall be appointed in each country ("responsible for BE Compliance").

It is the responsibility of each Divisional President and each Country President together with the respective responsible for BE Compliance, to adopt proper procedures to ensure that all relevant Securitas employees are aware of, understand and comply with local competition laws, rules and regulations, as well as this Policy, in the country in which they operate. Each company shall also have appropriate internal procedures for staying up to date with legal developments within the country or countries of operation within this area.

Each Country president, together with their local responsible for BE Compliance must (subject to the exception set out under in Sections 2 and 3) develop and implement:

- Detailed Country Competition Policies or a local language translation of this Policy in case no specific Country Competition Policy is required; and
- In jurisdictions where dawn raids are not uncommon, local dawn raid guidelines, including a dawn raid contact list

It is the responsibility of the Country President to limit the number of interactions Securitas has with trade associations within a country and to monitor the content of the interactions to ensure that this Policy is followed. The responsible for BE Compliance

shall keep a list of trade organizations in the country as well as persons attending meetings of such organizations.

It is the responsibility of the local responsible for BE Compliance to provide guidance on this Policy and ensure that any developments in local law (or any developments in international competition law which may affect their country or division) are reflected in their local policies and, where appropriate, communicated to the Group's Legal function.

6 TRAINING

Who: All Securitas support staff as well as operative staff above and including branch manager level should be given regular training to ensure the proper understanding of the principles in this Policy. The training should be tailored to be appropriate for the role, responsibilities, location and anti-trust risk of the individual.

When: All relevant new employees shall undergo training within 6 months after start date and thereafter all employees shall undergo training every 18 months.

How: All relevant employees shall undertake the global web-based training. All country management teams shall have regular face to face trainings, organized by in-house or external legal counsel, on this subject.

"At-risk-employees/high risk employees" (for example employees who regularly interact with competitors in trade associations or industry organizations) and *"control employees"* (employees who are in a position to control Securitas' anti-trust risk) shall be identified and targeted and tailored training shall be held for such employees at least every year.

7 REPORTING, INVESTIGATIONS AND CONSEQUENCES OF BREACH

All Securitas' entities, directors, employees and consultants are required to report any suspicions of improper behavior contrary to this Policy or local policies to their immediate managers or, where this is not possible, to a more senior manager, the responsible for BE Compliance, the country risk manager, local ombudsman or legal counsel, as appropriate in each jurisdiction. No employee will suffer negative consequences for complying with this Policy or local policies, even if such compliance results in the loss of business, or for reporting non-compliance.

It is of the utmost importance that the Group learns about any improper behavior as soon as possible, as in certain jurisdictions "leniency regimes" exist under which the company that first reports improper behavior to the relevant competition authority can be granted complete immunity from fines and sanctions.

All reported events or suspicions will be appropriately investigated, documented and followed up, using the same procedure for the investigation of complaints of non-compliance with *20. Securitas' Values and Ethics Code*.

If a reporting person does not wish, or is unable, to report a suspicion to his or her immediate manager or to another official within the organization, that person should report the issue through the Securitas Integrity Line at www.securitasintegrity.com (securitashotline.com in the US, securitashotline.ca in Canada and lineadealerta.com.mx in Mexico), via e-mail at integrity@securitas.com or to the

Securitas Group Sustainability Officer. Up-to-date contact information can be found on the Securitas website, www.securitas.com.

Any violations of this Policy or local policies or of the applicable competition laws will result in disciplinary action, up to and including termination of employment.

8 REVIEW AND FOLLOW-UP

Compliance with this Policy by all Securitas entities and employees will be monitored as part of the Securitas Enterprise Risk Management process, which includes self-assessments, internal and external audits, and routine follow-ups of all reported matters.

9 REFERENCE TO GUIDELINES

- *23.1 Guideline Dawn Raids*
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PROHIBITION OF MONOPOLIZATION / ABUSE OF DOMINANCE

General overview

It is unlawful for a company with substantial market power to abuse that position. As a result, so-called 'dominant' companies are subject to stricter standards of competitive behavior than other companies.

Securitas does not consider itself dominant in any market. Although the law regarding when a company maintains a dominant market position can vary by jurisdiction, and may be fact specific, for the purposes of this Policy the threshold is where the market share of Securitas within a specific market segment or business line exceeds 40 percent. Hence, as a consequence, relevant competition authorities could argue that Securitas is dominant for certain parts of its business, while for other parts it will not be considered as dominant. Contact the local legal department or local responsible for BE Compliance for guidance.

Dos and don'ts guidance – abuse of dominance

In markets where Securitas risks being considered dominant, the following will apply:

DO:	
	Do seek confirmation from the legal team of the risk status of a particular market when market shares may be above 40 percent (or if there is lower threshold in your local jurisdiction).
	Do consider the pricing restrictions imposed on a dominant company when quoting, developing pricing strategies and discount schemes and tackling competitive threats, e.g. from new entrants.
	Do , where possible and practical, document any cost savings which underpin and justify differential pricing or rebate schemes.
DO NOT:	
	Do not charge different prices to similar clients or the same prices to different types of clients without objective justification for such differences in treatment ("discriminatory pricing") and without the approval of legal counsel.
	Do not price below cost without objective and documented business justification and without the approval of legal counsel.
	Do not make pricing or the availability of discounts dependent on a client's loyalty in order to obtain all or part of that client's business ("fidelity pricing or rebates"). However, normal volume discounts are permissible.
	Do not impose exclusive purchasing obligations on clients.

Do not write anything that suggests that Securitas may achieve control or strong influence on pricing, service supply, service area or “dominance” of any market as a result of any event or transaction.

Do not refuse to supply products or services to new or existing clients unless there is a clear objective business justification (such as genuine lack of creditworthiness, insufficient capacity etc.) and even then only after consulting with legal counsel.

Do not make the purchase of products in markets where Securitas has a market share above 40 percent conditional on the purchase of another product (tied product) in circumstances where the products would typically be purchased separately.

TRADE ASSOCIATIONS

Securitas wants to develop the security industry to an industry characterized by competition based on quality and solutions (see further in *the Securitas Toolbox*) and is consequently a member of several trade associations and industry organizations. It is acceptable to be part of trade associations and industry organizations, but it is extremely important to ensure that the contacts between competitors in trade associations and industry organizations are in accordance with legal requirements.

There are examples of activities within trade associations that will not be prohibited, for example: education and training, general lobbying, and the discussion of legal issues.

However, the following arrangement between competitors are strictly prohibited even within a trade association:

- Price fixing (or other terms of sale or purchase)
- Bid rigging
- Allocation of clients amongst competitors
- Dividing markets between competitors
- Boycott companies

Agreeing with (or propose to) competitors to increase prices to reflect wage or cost increases is strictly prohibited!

In addition to this, formal exchanges of information (including statistical information) between members of a trade association are likely to be prohibited if they enable the participating companies to identify another company's prices, stock position, sales to particular clients or production capacity. It is therefore important to consult the Head of Legal before sharing or receiving information within a trade association.

With regard to trade association meetings:

- Only attend meetings sponsored by an officially recognized body that is properly constituted and broadly based.
- Check the agenda before any meeting you are due to attend and, if you are unsure whether a particular item is likely to lead to a discussion on matters which are sensitive from a competition law point of view, consult the Head of legal. If in doubt, or if the meeting has no formal agenda, do not attend or ask the Head of legal to join the meeting.
- If you attend a meeting and the discussion turns to sensitive matters, ask the chairman to terminate the discussion and that your request be noted in the minutes of the meeting. If necessary, leave the meeting and ask that your departure be noted.
- Keep a copy of the agenda and minutes of each meeting.
- Ensure that you do not take part, outside the forum of the formal meeting, in any informal discussion on any sensitive issue with a competitor.
- Please note that all contacts and socializing with representatives of competitors outside of a formal business context should be avoided.

We act in a market where many competitors do not follow the rules on minimum standards in terms of wage, health and safety, etc. As one of the largest companies active within the security industry it is our obligation to strive towards better conditions for employees within the security

sector generally speaking. Irrespective of this, it is not legal to share company specific information with our competitors even if the goal of such information sharing would be to improve the working conditions for such employees.

Always keep the Do's and Don'ts from Section 3.1.2 of the Policy in mind when in contact with competitors in a trade association.

The consequences of breaching competition laws are very serious and violations of this Policy is never in the best interest of Securitas. Reporting any and all such practices as well as offers or requests will always serve Securitas best interest.

It is the responsibility of the Country President to limit the number of interactions Securitas has with trade associations within the country and to monitor the content of the interactions to ensure that this Policy is followed.

GUIDELINES ON DOCUMENT CREATION / MANAGEMENT

In an anti-trust and competition law context, the following document management guidelines should be kept in mind, in addition to Securitas' more general policy on this area. In this regard, please note that e-mails are documents.

DO:

Do stick to the facts when producing documents – clarity is key! Avoid ambiguous statements and use positive language when describing a competitive goal (i.e. rather than focus on damage to be inflicted on competitors)

Do keep a record of the legitimate reasons for any meetings with competitors.

Do clearly mark communications to external lawyers (or documents prepared with a view to seeking advice) as “Legally Privileged & Confidential”.

Do consider, before creating documents, whether it is necessary to do so, e.g. would a call to seek advice from a member of the legal team on a competition law issue be as effective as an e-mail?


Do ask yourself before sending any internal or external report, memo, e-mail or similar – “*would I be comfortable with a competition authority reading this?*” and “*would I be comfortable if this were attributed to me in a newspaper or other public source?*”

DO NOT:

Do not speculate about whether an activity or proposal is illegal. Do not use emotionally-loaded vocabulary which suggests illegal or secretive behavior (even in informal e-mails), e.g. “*Please destroy after reading*”.

Do not write anything which implies that Securitas is conducting its business based on anything other than competition on the merits and its own independent business judgement.

Do not circulate legal advice beyond those who need to know it within the company, and **do not** share, forward or circulate legal advice to any third party (i.e., outside of Securitas). Doing so risks the unintentional waiver of important legal privileges that govern communications with Securitas' internal and external legal counsel.

GUIDELINE TITLE AND NO: 23.1 Guidelines on Dawn Raids		
OWNER: SVP General Counsel	APPROVED BY: CEO	APPROVED DATE: 200507
TARGET AUDIENCE: Global legal department and the countries “Dawn Raid Team”		

Guidelines on Dawn raids

Most competition authorities have the power to carry out unannounced inspections at company (and sometimes domestic) premises to gather information to help prove the existence of anti-competitive agreements or conduct (often referred to as “dawn raids”). Below, we explain the who, what, where, when, why of dawn raids and how to deal with them.

Purpose of the dawn raid guidelines

The purpose of these guidelines is to assist Securitas in handling dawn raids in an orderly and efficient manner, in compliance with legal requirements and without prejudicing the company’s legal rights.

A dawn raid is often the starting point for an investigation and the authorities often have substantial rights to access a premise and take documents. At the same time Securitas has important rights in relation to such dawn raid. The wrong actions during a dawn raid can lead to substantial fines for Securitas irrespective of whether Securitas has acted in breach of applicable competition rules.

In several jurisdictions in which Securitas operates there are criminal as well as civil sanctions for competition / anti-trust infringements, e.g. the UK and the US. In these countries, both individuals and the company are at risk. A dawn raid carried out by a competition authority using its criminal enforcement powers is likely to be more intrusive but will be undertaken under stricter procedural standards (as it may result in serious personal consequences, e.g. imprisonment). It is important to determine as early as possible whether a dawn raid may have criminal implications.

In the event of a dawn raid, the Head of Legal, if on site, will help the company follow the dawn raid guidelines. However, if a member of the legal team is not on site, a member of the senior management team will have this responsibility. This role is described throughout these dawn raid guidelines as (the On-site Team Leader). In the event of any questions surrounding the dawn raid guidelines, the legal team should be contacted in the first instance.

What is a dawn raid?

Who?

A group of officials from a competition authority will carry out the dawn raid (sometimes officials from more than one authority will attend). The inspection will target companies suspected of infringing the competition / antitrust rules, e.g. cartel activity such as price fixing or market sharing, or abuse of a dominant position.

A competition authority will always have an official authorization empowering it to carry out a dawn raid (referred to in these dawn raid guidelines as a “Mandate”, though it may take a variety of forms depending on the jurisdiction). This document will describe the scope of the investigation.

What?

A dawn raid involves a visit from a competition authority without prior warning. During the unannounced inspection, the authority has wide-ranging powers to enter premises, review a company's documents and electronically-stored information, make copies, demand verbal explanations and seal business premises / areas. Powers are more extensive if an authority is also conducting a criminal investigation (not applicable to all jurisdictions).

Where?

Depending on local laws, a competition authority may have the power to enter company premises, land and vehicles, as well as (in exceptional circumstances) private homes, land and vehicles. Other company premises and premises of competitors may also be subject to parallel inspections. A coordinated effort between competition authorities may also take place in more than one country simultaneously.

When?

Typically, unannounced inspections begin at the start of the working day (at around 9 a.m.). The dawn raid can last several days depending, for example, on the size of the site, the volume and complexity of information to search and number of officials involved.

Why?

Generally speaking, a competition authority will obtain approval for a dawn raid where there are reasonable grounds to inspect an infringement and a realistic risk that relevant information would not be provided voluntarily.

Dos and don'ts – the essentials

The table below summarizes the 'essential' points to remember. These points should also be included in the Divisional/Country Competition Policies (if relevant).

Before and during a dawn raid... DO:	
Preparation	
	<p>Do prepare a contact list as per the attached example, Appendix A, identifying the different roles. Ensure that the contact list is available in the front desk/reception and that all people identified in the contact list have a copy of such list.</p> <p>Update the contact list at least on a yearly basis.</p> <p>Conduct a dawn raid training at the local head office.</p>
Front desk / reception	
	<p>Do contact the identified first person as per the contact list. If he/she is not available, continue to make contacts as per the contact list.</p>

	Do identify the team leader from the competition authority. Carefully check (i) the Mandate providing the basis for and scope of the investigation and (ii) the identity cards of the officials. Take copies and e-mail to senior management / legal support.
	Do request that the officials wait for legal support to arrive (a short delay is usually permitted). Ask the officials to wait in a private area (such as an empty conference room), containing no papers.
On-site Team Leader	
	Do ask the officials how they intend to carry out the inspection, i.e. what they will be doing, how they will be doing it, whether other company sites are being inspected. They may not provide this information but it is acceptable to ask.
	Do create a team to manage the inspection, as per the contact list. Arrange for each official to be shadowed by a member of staff, ideally a lawyer (a so-called Reviewer). IT and administrative assistance will also be required.
	Do prevent the officials from copying or reviewing documents which are (i) outside the scope of the investigation and/or (ii) protected by legal privilege. If contested by the authorities, seek legal advice for guidance how to proceed.
	Do arrange for the copying of documents / inventories taken by the authorities – 3 copies are advised: a copy for the officials, a copy for the company and a copy for the lawyers.
	Do keep a full record of events – areas searched, questions asked and other points of interest (e.g. electronic search terms where apparent).
	Do respond truthfully and promptly to an official's request for explanations / the whereabouts of documents relating to the subject-matter of the inspection. Officials cannot compel a company to provide an answer which involves admitting an infringement. If uncertain, ask to seek legal advice before answering.
	Do inform on-site employees about the inspection and implement an external relations reaction and communications plan.
	Do stay calm, cooperative and courteous but, if necessary, be firm. Remember, however, that obstructing the investigation can lead to fines.
During and after a dawn raid... DO NOT:	
	Do not leave officials unaccompanied.
	Do not provide information unless asked and even then only provide factual explanations of documents, without admitting an infringement. Be helpful but do not speculate. Seek advice if you are uncertain.

Do not destroy, conceal or delete documents or data (paper or electronic).

Do not tamper with an official seal. Even accidental damage to a seal can lead to high fines.

Do not inform anyone outside the company (except external lawyers) about the dawn raid, except to the extent included in the approved reaction and communications plan.

Do not forget this is serious. Anything you say to the competition authorities may be used against Securitas and, possibly, you.

DAWN RAID CONTACT LIST

Last updated: [DATE]

LEGAL TEAM

In case of a dawn raid, immediately contact any of the following members of the legal team.

Name, Position (Office)	Tel: Mobile: E-mail:

As well as the person responsible for Business Ethics Compliance (could be the same as above):

Name (Office)	Tel: Mobile: E-mail:

If the Legal Team is not available, pls contact the people identified below.

DAWN RAID TEAM

The following people have been allocated as responsible for the respective areas during a dawn raid

Position (Office)	Name	Tel: Mobile: E-mail:
1. CP	a. [primary contact] b [back up person]	
2. Finance	a. [primary contact] b [back up person]	
3. IT	a. [primary contact] b [back up person]	
4. Communications	a. [primary contact] b [back up person]	
5. Security	a. [primary contact] b [back up person]	

EXTERNAL COUNSEL

The following External Counsel should be contacted. The External Counsel should ensure that an appropriate team is sent to the relevant site without delay.

Name	Tel: Mobile: E-mail:

A copy of this contact list must be available at the front desk/reception at all times. All people identified in this contact list should have a copy of the list. The list should be reviewed and updated at least yearly.