

Employee Code of Conduct



 **FALCK**

Message from our CEO

Dear colleagues,

Falck's Winning Behaviours define our common approach on how we act towards colleagues, patients, customers and society in general. This Employee Code of Conduct is built on the principles of the Winning Behaviours, and sets out a common framework as a basis on how we are expected to behave.

The Employee Code of Conduct ensures that we conduct our business in a way that will never compromise the trust of our business partners and customers. It serves as a guideline and point of reference for anyone at Falck faced with ethical dilemmas, doubts or concerns. When faced with uncertainties, it is our duty to ask for guidance.

We need to safeguard our organisation through transparency and by maintaining

an ethical culture where everyone feels comfortable with raising concerns and is empowered to report misconduct.

Knowing, understanding and living the Employee Code of Conduct is a fundamental part of who we are as Falck employees. Please read this Employee Code of Conduct carefully and refer to it when in doubt. With a shared commitment to adhere to the Employee Code of Conduct, we will maintain good business practice, and I look forward to continuing working with you all in fostering a culture of integrity and trust. Please let our Winning Behaviours guide you going forward.

Jakob Riis
President & CEO



Winning Behaviours

Our Winning Behaviours define how we act towards our customers, society and each other. They are the foundation of what we do, the services we deliver, and the company that we are. They provide clarity in how we act in our daily work and aspiration for how we can be even better. They bring us closer together as One Falck.



We are committed to care

People in need are at the heart of every decision we make, and we always strive to improve our competitive edge in offering excellent services to save and improve more lives.

We respond fast and have what it takes to turn care into action.

We care about what we do, who we work for, who we provide our services to and the people we work with.



We build trust

Quality and ethics take priority in everything we do. We protect our license to operate by being transparent and living by high compliance standards.

We make no compromise when it comes to loyalty and consistency to earn and uphold the trust of our customers and society. We approach competition with a strong ethical compass.

We are open and honest with our managers, our employees and each other. We are never afraid to speak up if Falck's integrity is at stake.



Together, we create more value

We bring value to society and people in need by being there when they need us.

We never settle to create value for shareholders. In doing so, we honour past investments in our business and allow for future funding in developing emergency response and healthcare services.

We work efficiently together across functions, countries, and business units to continuously improve our services and surpass ordinary standards which sets us apart from competition.

Introduction

Falck A/S's (together with its subsidiaries the "Falck Group" or "Falck") Employee Code of Conduct sets out the minimum standards and ethical principles by which all Falck employees should conduct themselves. It provides us with a common understanding of how we conduct business, and everyone at Falck is expected to act in accordance with this Employee Code of Conduct.

The Employee Code of Conduct does not cover every possible situation but provides guidance towards good judgment and promotes high ethical standards of everyone.

At Falck, we conduct business in accordance with all applicable laws and regulations in the countries in which we operate. Where this Employee Code of Conduct conflicts with local law, and you are unsure how to proceed, the law will always take priority. In case of any doubt as to the applicable law, please consult Falck Legal & Compliance.

The Falck Employee Code of Conduct applies to everyone within the Falck Group, including employees, directors, managers and anyone else acting on behalf of the Falck Group from time to time.

- We comply with **all applicable laws** and adhere to Falck **policies, standards, and procedures**
- We promote a **culture of integrity** with the highest ethical standard through **mutual respect** and **trust in each other**
- We set the example for each other by being **honest** and **fair**
- We hold each other **accountable** and **report any potential violations** when we become aware of them



Your role

The Employee Code of Conduct cannot address every situation that you will face in your role in Falck as there will continue to be emerging areas, legal and regulatory uncertainties, risks and challenges going forward. If you are unsure or find yourself in a situation that you do not know how to navigate in, please ask questions and seek further guidance from the Code of Conduct responsible. Part of building a culture of trust is speaking up about any ethical or compliance concerns so that these can be addressed.

We have no tolerance for retaliation, and no one will suffer any adverse consequences for raising a concern in good faith about potential misconduct.

Employees

- Read and understand this Employee Code of Conduct and apply its principles in your daily work
- Speak up and report potential or actual violations of this Employee Code of Conduct
- Think before you act and use good judgment
- Promptly raise any concerns through the channels provided
- Know when to seek guidance or request more training
- Stay alert and pay attention to activity that is inconsistent with the Employee Code of Conduct
- Avoid any practices that may lead to unlawful conduct or damage Falck's reputation

Managers

- Discuss this Employee Code of Conduct with employees reporting to you to ensure they understand the Employee Code of Conduct, and provide guidance on how to do their daily work in an ethical way and with an ethical mindset
- Ensure that all new employees and external personnel acting on behalf of Falck in your team are familiar with the Employee Code of Conduct
- Encourage and promote a culture where employees feel comfortable speaking up, and ethics and compliance dilemmas are voiced and handled
- Acknowledge and support any employee who comes forward to discuss an issue or report a potential violation – and ensure there is no retaliation for doing so
- Lead by example in both words and action and by role-modelling ethical decision-making
- Demonstrate to your team that for results to matter, they must be achieved the right way

Each of us is responsible for ensuring that we follow the highest ethical standards of business conduct, and we will be held accountable for upholding our commitments to this Employee Code of Conduct and its associated policies and procedures.

By being part of Falck, you are agreeing to uphold the commitments of this Employee Code of Conduct. If you do not do so, you put yourself, your colleagues and Falck at risk.

Speak up

Falck encourages all employees to report, in good faith, any concerns or knowledge about irregularities or improper actions that have been committed, are suspected or likely to have been committed, or actions that fail to comply with applicable laws and regulations, this Employee Code of Conduct or internal policies.

You can always raise concerns to your manager, People & Culture or Falck Legal & Compliance. Reports can also be made through Falck's whistleblower system, Falck Alert, at any time either via the website FalckAlert.com or through the Falck Alert app, which is available in six languages. A report can be made anonymously for those that may prefer it.

All reports are handled under conditions of strict confidentiality whether made anonymously or not. All data will be processed with a high level of security and is deleted when no longer needed.

By making a report, you are giving Falck the opportunity to deal with the issue directly. Remaining silent about possible misconduct may worsen a situation and decrease trust.

Falck Alert should not be used for ordinary employment or practical complaints. Reports must only be made in good faith and without malicious intent.





Respecting people

Our employees are our most important asset. We want to be a workplace where people thrive both personally and professionally regardless of their individual differences. We also know that different skills, ideas and approaches are key to the success of our business. Because of this, supporting diversity and encouraging an inclusive culture in which our people have equal opportunities are both ethical and business priorities.

All Falck employees should be treated with respect and dignity, and be able to work in an environment free from fear, intimidation and prejudicial biases. Falck does not tolerate any form of discrimination based on gender, ethnic origin, race, religion, age, sexual orientation, civil status, physical ability etc. We strive to foster an inclusive culture of all those with visible and hidden differences but also with diverse backgrounds and mindsets.

Falck adheres to all applicable laws and regulations aimed at the protection and promotion of human rights globally and in the workplace – including the right to freedom of association, to be member of a union or other collective bargaining group.

It is the responsibility of all employees at Falck to treat each other with respect and act according to the fundamental rights of the individual. And to speak up in case of concerns.

What is expected of you?

- Contribute to a welcoming, caring and inclusive work environment.
- Treat others with respect and never participate in or tolerate any kind of harassment.
- Never discriminate based on gender, ethnic origin, race, religion, age, sexual orientation, parental and marital status or the like.
- Adhere to laws and regulations relating to labour conditions.
- Respect your colleagues' right to join a union of their own choice or another collective bargaining group.
- Speak up if you experience any potential misconduct. Contact your nearest manager, the local management team or use Falck Alert when relevant.



Health and safety

We go to work every day with a promise to be there for people in need. To be able to care for others, we must first take care of ourselves. A company that is not safe is not a sustainable company.

As employees at Falck, we share the responsibility to take a proactive approach to our own health and safety and to the well-being of others. We want to build on the strong foundation of our commitment to care and be an organisation where health and safety is deeply integrated into our culture. Our management is expected to lead by example and be ambassadors for executing our operations in a safe way.

A healthy and safe work environment is characterised as a workplace, which prevents and manages physical and psychological injuries. Each of us has a personal responsibility to step in if we witness an unsafe act and raise concern when we see anything that poses a threat to the safety and well-being of ourselves and our colleagues.

We must report all safety incidents promptly and manage them appropriately ensuring that learnings are captured and applied where relevant to facilitate continuous improvement.

What is expected of you?

- Take all appropriate precautions to ensure your own safety and that of others around you.
- Always maintain health and safety awareness – also when you are not performing operational tasks.
- Challenge your colleagues if you witness them performing any unsafe acts and report via appropriate channels.
- Consider the risks through risk assessments before starting a task and promote a healthy and safe working environment.
- Act if you witness or experience mental health issues for you and your colleagues.
- Always follow health and safety procedures and support your colleagues in doing the same.
- Raise awareness if you feel at risk and work together to manage risk and prevent accidents.
- Use the correct personal protective equipment where necessary and in accordance with the relevant procedures.
- Never compromise on health and safety and report any concerns you may have to your manager.
- Share best practice with your colleagues and learn from each other.
- Never consume or be under the influence of alcohol or drugs at work.



Anti-bribery and anti-corruption

Falck has a zero-tolerance approach towards any form of direct or indirect, passive or active bribery.

We routinely engage and interact with public or government officials and business partners around the world given the nature of our business. We must be mindful that most jurisdictions impose strict procedures and rules on how private parties may interact with government officials.

We comply with the principles of the US Foreign Corrupt Practices Act, the UK Bribery Act and similar laws that apply to Falck. Bribery and corruption occur when a payment, gift or anything of value (financial or otherwise) is offered, promised, paid, authorised, requested or accepted to improperly influence a decision or outcome affecting our business.

We resist committing to or being complicit to committing any act or attempt of fraud. We do not make improper payments or offer anything else of value to any government

employee, or other public official to speed up or secure a process. We will not engage in unethical or illegal behaviour to obtain or retain any of our business activities.

Social investments, donations, or sponsorships should never be offered or provided with an improper purpose, or under conditions that could have an improper influence on the recipient. We are committed to conducting our business with integrity and in compliance with applicable anti-corruption and anti-bribery laws and regulations.

What is expected of you?

- Never engage in any type of bribery directly or indirectly.
- Refuse any payments to public officials that are not required by law or an existing written agreement.
- If making a payment to e.g. an official body, you should always ensure that the fee demanded is substantiated by publicly available information and always make sure you receive and file a receipt.
- Never make facilitation payments unless there is a threat to health and safety.
- If faced with a demand for a facilitation payment and there is a threat to health or safety, seek approval from your manager immediately and report the incident without delay in the Code of Conduct form documenting manager approval.
- Never offer, pay or accept any form of kickback, rebate or anything of value to obtain any kind of business advantage or personal benefit.
- Keep accurate records of all transactions and keep them up to date.
- Avoid any financial transactions, which bypass registration and reporting requirements.
- Use Falck funds solely for company purposes.
- All credit card expenses and reimbursements must be accurately reported and documented.
- Report any actual, suspected or request for bribe to your manager and Falck Alert.



Conflicts of interest

We need to ensure that business decisions are made in the best interests of the company and never compromise our integrity or the trust of our business partners. Therefore, we must disclose promptly any personal interest that might objectively be perceived as affecting our decision-making.

A conflict of interest can be defined as a situation in which we cannot make a fair decision because we would be personally affected by the result. When considering a course of action, we should ask ourselves whether the action could create an incentive for us – or appear to others to create an incentive for us – to benefit ourselves, our friends or family, or an associated business at the expense of Falck.

We do not influence the decision-making processes for hiring or vendor selection if the person is a friend or family member. We refuse any favours (financial or non-financial) offered by any external party with the intent to provide this party with a preferential or more favourable treatment by Falck.

We must avoid conflicts of interest and should speak up if we are in doubt as to whether a conflict of interest may exist.

What is expected of you?

- Never involve yourself in commercial activities if they contain a financial or private interest that causes a conflict with your responsibility or business decisions at Falck.
- Always register any actual or perceived conflict of interest via the Code of Conduct form.
- Ensure that any circumstances which might suggest a conflict of interest are transparent, even if there is no such conflict, and that associated business transactions are handled with the appropriate discretion and control.
- Avoid ownership or financial interest in a company that is a customer or supplier to Falck unless disclosed and approved by your manager.
- Never direct business or give favourable terms to a company that you, a close friend, or a family member has an interest in.
- Never hire friends or family unless they are the best qualified candidate, and the relationship is disclosed and approved by your manager.
- Never allow situations where family members or close relatives are in direct reporting relationships or relationships involving supervision, evaluation or determination of pay or other benefits.



Gifts and hospitality

It is recognised that gifts or hospitality in some circumstances can be part of conducting business. However, employees must exercise caution by always considering the circumstances, type and purpose of the gift, and whether these are appropriate. We must always consider how our actions are perceived by others.

We must therefore avoid offering, giving or receiving any gift or hospitality to any external third party where such activity can be perceived as an inducement to gain or retain business.

Gifts and hospitality to or from business partners are only permitted if they comply with applicable laws, have a legitimate business purpose, are of moderate value, proportionate and business-related.

Offering, giving or accepting gifts to or from any public officials is never allowed for Falck employees. Hospitality in the form of e.g. hosting or attending a meeting with public official(s) is only allowed where the value per attendee does not exceed US\$100.00.

Transparency is key when dealing with gifts and hospitality, and thus all gifts or hospitality with external business partners, other than public official(s) for which no gifts are allowed, above US\$100.00 must be approved by line management and registered in the Code of Conduct form with the approval attached.

What is expected of you?

- Ensure that any gift or hospitality exceeding US\$100.00 in value is approved by your line manager.
- Register any gifts or hospitality with a value of US\$100.00 or more via the Code of Conduct form.
- Ensure that any gift or hospitality is reasonable, modest, proportionate and business-related.
- Never offer or accept any gift to or from public officials.
- Only host or attend a meeting with public official(s) where the value per person does not exceed US\$100.00 per person.
- Think carefully about how your actions may be perceived by others, considering the frequency, type and purpose of any gifts or hospitality.
- Make sure that any gift or hospitality offered or received does not have potential to damage Falck's reputation.
- Seek approval from your manager for travel or lodging offered by a third party.
- Only accept or give gifts in alignment with this Employee Code of Conduct.
- Never give or receive gifts or hospitality during periods when important business decisions are being made.
- Cash or cash equivalents, personal services, loans or any illegal gifts must never be offered or received.



Communication

We communicate with impact. We are committed to care and strive to treat colleagues and stakeholders with fairness and respect by being transparent, clear and honest in our communication. We wish to use a positive tone of voice that instils confidence and trust.

It is important to protect the Falck name and ensure that communication is consistent across our business to build trust in our services and our brand. When developing communication materials, we should always follow Falck's communication and branding guidelines.

In our private use of social media, we must not portray ourselves as a Falck spokesperson or otherwise act in a manner that is likely to be perceived as if we are communicating on behalf of Falck. Only employees who are duly authorised to do so may communicate on behalf of Falck, however, if using social media, we are expected to use common sense and always maintain a polite and professional tone.

What is expected of you?

- When communicating with colleagues, customers or business partners, make sure to give honest and reliable information.
- Never communicate on behalf of Falck unless you are authorised to do so.
- If approached by the media, always notify the Global Head of Communication, ESG & Branding or the global or local press officers.
- Ensure that interviews with the media or press releases are cleared with the Global Head of Communication, ESG & Branding or the global or local press officers.
- Be aware of and ensure compliance with Falck branding guidelines.
- Always ensure that promotional materials are duly reviewed and approved.
- Ensure your social media usage and public speaking related to Falck is executed with respect, responsibility and good judgement.
- Be mindful that private conversations on social media may be perceived by the public as communication on behalf of Falck.



Safeguarding information

We rely on data and information in order to conduct our business activities. Unauthorised disclosure or misuse of information could adversely impact Falck, our customers, business partners and our employees who have entrusted the company with such information.

It is our duty to ensure that all information and data – whether representing intellectual property rights, trade secrets, personal or confidential information – are managed and processed responsibly. We all have a responsibility to ensure that personal data are treated and processed in a legitimate way.

Secure and reliable digital tools and systems are essential for Falck to serve customers in our daily operations. Incidents such as data breaches or cyber attacks where IT systems are unavailable for longer periods of time or where data are leaked or stolen could have serious reputational, financial and brand impact for Falck.

As Falck employees, we must adhere to company policies and procedures to avoid unknowingly putting information security, data protection or Falck's reputation at risk.

What is expected of you?

- Be vigilant and avoid opening emails from unknown senders.
- Ensure that no confidential company information is shared with anyone, unless authorised.
- Always protect your devices from unauthorised access, loss, damage or theft.
- Avoid clicking on unknown links or opening attachments in emails that are unexpected or come from an unknown source.
- Only collect personal information about any persons on behalf of Falck for legitimate purposes, by lawful means and in compliance with our policies on data protection and data ethics.
- When accessing Falck IT resources, make sure you set up long and complex passwords that cannot easily be guessed.
- Never re-use passwords you already use for any private accounts, especially social media – and never share your passwords with anyone.
- Always be cautious when browsing the Internet and avoid downloading files from unknown sources or clicking on links on suspicious websites.



Our responsibility to the environment

We seek to implement environmentally sustainable solutions in our business as soon as they become available. We direct our efforts to the continuous improvement of our environmental performance and the analysis of risks and opportunities in the decision-making and business planning processes.

We aim to mitigate as far as possible any negative environmental impact that our business activities may cause. As Falck employees, we are expected to support a precautionary approach to the environment and take steps to work in a sustainable manner.

In every decision we make, we consider the impact on the environment. By encouraging individuals to make a sustainable use of resources, fuel, and electricity, we create a climate-conscious working environment.

What is expected of you?

- Comply with the rules of national and local authorities regarding the environment and the workplace.
- Continuously work to generate the smallest possible detrimental impacts for the environment when making business decisions.
- Ensure the efficient use of Falck's resources and contribute to energy saving and efficiency objectives, including on reduction of water and natural resources consumption, waste and carbon emissions.
- Where relevant, you encourage our business partners to act in an environmentally conscious way and to comply with applicable environmental laws and regulations.

Zero-tolerance statement

Falck's long-term ambition is to be at the forefront of ethical business practices – taking significant and immediate steps to reach such a position. Firstly, Falck's management must set the tone for the rest of the organisation by clearly understanding and identifying ethical conduct as an unnegotiable priority. Secondly, everyone at Falck must understand what strict compliance with the Employee Code of Conduct means and that it is an absolute requirement.

- 1** At Falck, all employees are expected to behave ethically and can refer to the Employee Code of Conduct for guidance on best ethical practice.
- 2** Falck does not tolerate unethical behaviour or violations of the Employee Code of Conduct by any employee.
- 3** All employees are responsible for completing the Code of Conduct training and to comply with it at all times.
- 4** All employees are required to report any actual and/or suspected violations of the Employee Code of Conduct to their manager or through Falck Alert.
- 5** Employees reporting on violations will be protected from retaliation.
- 6** Suspicions of violations will be investigated, and implicated employees must be treated in a fair and objective manner.
- 7** All employees involved in investigations must be treated equally, regardless of job title or level in Falck.
- 8** Violations of the Employee Code of Conduct will result in disciplinary actions, such as re-training, reprimands, suspension, or dismissal.
- 9** Intentional violations of the Employee Code of Conduct will result in immediate dismissal.
- 10** Two written reprimands will result in dismissal.

All reports on or suspicions of violations of the Employee Code of Conduct are subject to an independent and objective investigation process, which is owned by Falck Legal & Compliance.

Falck Legal & Compliance recommends the appropriate disciplinary actions following an investigation, including potentially elevating recommendations, in alignment with management. In case of disagreement with management, Falck Legal & Compliance can elevate cases to the Audit Committee for their final decision.

Definitions

Bribe

A bribe is a direct and/or indirect payment, offer or promise to pay or give anything of value to cause an official or business partner not to perform their duty, or to do what they should not do, e.g. providing a service the payor is not entitled to receive.

Business partners

Business partners include any commercial entity or individual with whom Falck has any form of cooperation or arrangement through an agreement. This can include, among others, customers, clients, suppliers, agents, etc.

Conflict of interest

A conflict of interest occurs where an individual's or party's private or personal interests conflict with Falck's interest as well as their ability to work in Falck's best interest. The private or personal interests could include any close connection to another individual or party, such as familial or friendship ties, as well as commercial or financial interests, such as having a stake in another party's company.

Employee

An employee is an individual who works part time or full time, under an open or fixed-term contract of employment with Falck.

Facilitation payments

Facilitation payments are small payments or gifts (e.g. cigarettes, alcohol, perfume) given to public officials, intended to secure or speed up routine government actions, which you are already entitled to without the need for such payment.

Fraud

Fraud is the deliberate deception intended to secure financial or personal gain or to deprive another individual or party of their valuables.

Gifts and Hospitality

A gift is anything of value. Hospitality includes meals, beverages, invitations to business events or trade shows, tickets to cultural or sporting events, travel, accommodation, or other kinds of entertainment.

Kickback

A kickback is a form of negotiated bribery where a commission is paid to an individual or party in exchange for services rendered.

Public officials

- (a) Any appointed official or any director, officer or other person employed in any capacity
 - i) at any level of national, regional or local government (e.g. employees of customs and immigration authorities),
 - ii) at any entity owned, managed or otherwise controlled by any government or political party,
 - iii) in any public international organisation such as the United Nations or the European Union, including any department or agency thereof.
- (b) any candidate or officer or other person employed by a political party, or
- (c) any person acting in any official capacity for or on behalf of any person or organisation listed in (a) or (b).

Where to get more information

This Employee Code of Conduct is supported by a range of specific policies and procedures, which are implemented across Falck to help us compliantly serve our customers and contribute to the communities in which we operate. Refer to the Falck management system (GEMS) or to your manager or workplace leader for more information.

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