

Green Claims Policy

Upholding communication standards

Version 1. September 2024



**The Anti-
Greenwash
Charter**

Certified Signatory

Every organisation that signs The Anti-Greenwash Charter commits to adopting a Green Claims Policy that upholds the standards of all marketing communications on the topic of sustainability across the business.

The Gunnebo Entrance Control Green Claims Policy outlines our standards on marketing and is part of our framework for honest, fair and transparent sustainability related communications.

In addition to this policy, comes our compliance to all relevant advertising and marketing standards, specifically the [UK's Green Claims Code](#), the [European Union Green Claims Directive](#) and the [International Chamber of Commerce Framework for Environmental Marketing Communications](#).

Sustainability is a fast-moving area and we are continually improving and learning how to communicate with transparency and honesty. Our commitment to The Anti-Greenwash Charter is one way that we can uphold our intent for honest communications around the topic.

Contents

Green Claims Policy	4
Our Standards	5
Our Practices	6
Our Definitions	7
Claims	12
Use of Imagery & Colour	15
Editorial Processes	18
Training	19
Customer Engagement	20
Partnerships & Collaborations	21
Regular Reviews	22
Policy Governance	22
Independent Reviews	23
Verification of Claims	23
Recognising Room for Improvement	24
Our Position on Sustainability	27

An important note on this Green Claims Policy

Within this policy you will find references to, and definitions for, Our Business, Our People and Our Impact. These relate to our holistic position on sustainability which considers the environment and socio-economic factors as one. They have been included in this policy for the interest of transparency, context and the fair and accurate reporting of trade-offs. **Specifically, Our Business and Our People reporting, definitions and communications are not subject to the governance or review of The Anti-Greenwash Charter.**

Green Claims Policy

Our policy for upholding good standards of responsible marketing

As a signatory of The Anti-Greenwash Charter, we are committed to upholding good standards of responsible marketing practice. The purpose of this Green Claims Policy is to define the standards we adopt throughout Gunnebo Entrance Control to ensure green claims made about our products and business are fair and substantiated.

This policy applies to all the forms of marketing and advertising we use, including online marketing, social media, public relations, direct marketing, packaging, events, sales, professional promotions and communications.

In addition to this policy, we comply with all relevant local laws and regulations, as well as the Content Values of Honesty, Transparency and Fairness as outlined in the Gunnebo Sustainability Communications Strategy.

Our Standards

We commit to the standards of communication set out in The Anti Greenwash Charter, which are as follows:

Transparency

We commit to clear communication of what sustainability benefit our product or service offers and don't conceal or omit information

Accountability

We substantiate our sustainability claims with accurate, and regularly evaluated empirical evidence. We commit to sharing facts, figures and statements that can be checked.

Fairness

We commit to using fair, clear and unambiguous language when providing comparisons with other products or organisations.

Honesty

We ensure we make specific statements about our organisation's sustainability efforts and that our actions match those promises.

Our Content Values

The standards of The Anti Greenwash Charter are in-line with our Content Values, established in December 2023 through the Gunnebo Sustainability Communications Strategy. These are:

Honesty

Honest reporting of our sustainability progress and actions is integral to our content. When creating sustainability communications, we make every attempt to not mislead our audience and be honest about what we say.

Transparency

When reporting on facts and figures, or on progress towards our targets, we are transparent about the information we present. We do not conceal figures or omit statements to give the impression of improved performance and we present the trade-offs of our actions.

Fairness

When comparing our business or products to others, we only present like-for-like information and avoid the use of ambiguous language that may show our business or products in a more favourable light than the comparison suggests.

Our Practices

We implement the following practices and procedures to ensure we uphold the aforementioned standards:

Clearly define the green terms we use

The Gunnebo Entrance Control Sustainability A-Z (published February 2024) provides clear definitions for the language we use around sustainability-related business practices and product claims. We updated definitions on an annual basis to ensure we are using current and understandable terms.

Provide third-party verified evidence or internal data for the claims we make

We are working towards achieving independently verified Environmental Product Declarations (EPDs) for all of our products. Also, in line with Gunnebo Group's commitment to SBTi, all of our climate emissions data is calculated using a verified platform that conducts quality assurance. While we progress, we will support all claims with data from these EPDs. Whenever that's not possible, we will provide data from our own tests or analysis as evidence. We will clearly state when the data

we used is not independently verified.

Set standards for authentic and accurate visual representation

We outline our standards for authentic and accurate visual representation in the Gunnebo Sustainability Communications Strategy. This Green Claims Policy upholds the same standards.

Detail the training we provide our employees

We prioritise awareness and engagement on sustainability throughout our organisation and all employees undertake mandatory e-learning modules on ESG. From 2025, they will engage with bite-size learning six times a year. Alongside, there is training provided on significant and relevant topics to the management team and for the specific needs of each department. We also provided specialist training and workshops on greenwashing and sustainability communications.

Escalation procedure

Our escalation procedure is identified in the Gunnebo Sustainability Communications

Strategy: Complaints Procedure. It outlines a path to complaint submission, recording, review, response and resolution.

Explain how we support partners and collaborators

We give all our suppliers access to our sustainability documentation and policies and through our Global Partners Network we provide training and support on sustainability communications, led by the network's Sustainability Champion.

Commit to regular reviews and effective governance

We outline our process for reviews of communications in the Gunnebo Sustainability Communications Strategy: Review Procedure. This assigns responsibility for all approvals and the governance to the Gunnebo Entrance Control's Global Marketing and Sustainability Director. The Gunnebo Entrance Control Global Sustainability Officer is responsible for the review process and implementation of the Green Claims Policy throughout the business.

Our Definitions

Standard definitions

Sustainable; an action or process that leads towards being able to maintain a certain rate or level without increasing resource use or impact on society.

Sustainability; according to the United Nations, sustainability refers to meeting the needs of the present without compromising the ability of future generations to meet their own needs.

Sustainable business; a business that is economically viable, socially accountable, and environmentally responsible.

Sustainably sourced; a material or product that is sourced from certified managed resources, e.g., FSC certified timber.

SDGs (Sustainable Development Goals); 17 goals established by the United Nations to promote prosperity while protecting the planet.

Our business

Business ethics; principles and behaviours of an organisation that is considered to be of value and socially ethical (transparent, honest, do no harm, etc.).

Business resilience; the ability of an organisation to adapt to a continuously evolving environment for prosperity and success.

Collective bargaining; all negotiations which take place between one or more employers or employers' organizations, on the one hand, and one or more workers'

organizations (trade unions), on the other, for determining working conditions and terms of employment or for regulating relations between employers and workers.

Corruption; abuse of entrusted power for private gain which can be instigated by individuals or organisations.

Customer privacy; Right of the customer to privacy and personal refuge.

Corporate Social Responsibility (CSR); an organisational management philosophy that guides companies to integrate social and environmental concerns into business practices.

An important note on definitions within this Green Claims Policy

Within this section you will find definitions for Our Business and Our People. These relate to our holistic position on sustainability which considers the environment and socio-economic factors as one. They have been included in this policy for the interest of transparency, context and the fair and accurate reporting of trade-offs. **Specifically, Our Business and Our People reporting, definitions and communications are not subject to the governance or review of The Anti-Greenwash Charter.**

Corporate Sustainability Reporting Directive (CSRD); an EU legislation requiring all large companies to publish regular reports on their environmental and social impact activities.

EU Taxonomy; a classification that sets criteria to determine whether an economic activity significantly contributes to the six environmental objectives as defined in the regulation.

ESG (Environmental Social Governance); a framework used to measure a business's non-financial performance in environmental, social and governance categories.

GDPR; General Data Protection Regulation

Greenwashing; the practice of falsely promoting an organisation's environmental efforts or spending more resources to promote the organisation as green than are spent to engaging with environmentally sound activities.

Greenhushing; the practice where companies under report or deliberately withhold information about their environmental efforts and achievements.

Purplewashing; the practice of falsely promoting an organisation's diversity, equality and inclusion efforts or spending more resources to promote the organisation as diverse or inclusive than are spent to engaging with ethically, diverse, inclusive and socially sound activities.

Responsible procurement; ensuring that the products and services existing within our supply chain are as sustainable as possible with the lower environmental impact and positive social value.

SFDR; EU legislation that regulates the sustainability information that financial advisors and financial market participants must disclose.

Value chain; refers to the full range of activities downstream and upstream within business operations and/or a products life cycle.

Our people

Accessibility; products or services that are designed and developed so that people with disabilities can use them.

Accident; an unplanned incident resulting in ill-health, injury, death or damage.

Bias; a conscious or unconscious prejudice, tendency, inclination or favouring of or against one thing, person or group over another, which is often seen as unfair.

Cultural appropriation; entails adopting aspects of a minority/marginalised culture by someone without sufficient understanding of its context and respect for its original meaning, and value. This can be used to promote disrespectful cultural or racial stereotypes that can cause significant harm.

Disability; a visible or invisible physical or mental impairment that substantially limits one or more major life activities of an individual; a record of such impairment or being regarded as having such impairment.

Discrimination; an act and result of treating persons unequally by imposing unequal burdens or denying benefits instead of treating each person fairly on the basis of individual merit.

Diversity; the condition of being different or having differences in respect to age, class, nationality, ethnicity, gender, health, physical and mental ability, race, sexual

orientation, religion, physical appearance, educational level, job, personality trait etc.

Equity; a fair treatment for all while striving to identify and eliminate inequalities and barriers.

Freedom of association; right of employers and workers to form, to join and to run their own organisations without prior authorization or interference by the state or any other entity.

Hazard; a situation that has the potential to cause harm, ill-health, injury or damage to property, people or environment.

Inclusion; providing equal access to opportunities and resources to everyone, in particular those who might otherwise be excluded or marginalized.

Institutionalised ableism; beliefs or actions that are based on the assumption that being able-bodied is 'normal' while other states of being need to be 'fixed', often in the form of un/intentional organizational barriers that result in disparate treatment of people with disabilities.

LGBTQ; an abbreviation for lesbian, gay, bisexual, transgender, and queer.

Micro aggression; a comment or action that unconsciously or unintentionally expresses or reveals a prejudice attitude toward a member of a marginalised group. These actions can be insulting, stereotypical, undermining, devaluing, de-legitimising, exclusionary, etc.

Modern slavery; an overarching term for extreme forms of exploitation including human trafficking, child labour, forced labour etc.

Privilege; invisible unearned sustained advantage and benefits that comes from race, gender, sexuality, ability, socioeconomic status, age, and other differences

Racism; a belief that racial differences produce or are associated with inherent superiority or inferiority. Within an institution this is often systemic where different forms of racism are engrained in society or organizations. It is when an entire racial group is discriminated against, or consistently disadvantaged, by larger social systems, practices, choices or policies.

Under-represented; sub-groups within larger racial/ethnic/gender minority groups that are particularly under-represented within a company relative to their size.

Our impact

1.5 Degrees; the target set by the 2015 Paris Agreement as the global average temperature compared with pre-industrial levels.

Active transport; physical activities that take you to and from your destination, e.g. walking, running, cycling, skateboarding.

Bio-based; a material derived from natural resources that acts as an alternative to fossil fuel based material.

Biodegradable; a product or material that can be returned to soil and water without industrial processes or chemical accelerants.

By-product; a material that demonstrates a post-industrial origin, e.g. production waste of another product.

Carbon footprint; the total emissions of greenhouse gases for an activity or organisation over a given period of time.

Circular economy; a system where materials never become waste and nature is regenerated. In a circular economy, products and materials are kept in circulation through processes like maintenance, reuse, refurbishment, re-manufacture, recycling, and composting.

Climate action; activities to tackle climate change and its impacts, usually by reducing greenhouse gas emissions.

Composting; microbial breakdown of organic matter in the presence of oxygen to produce soil with organic content.

Cradle to Cradle; a design philosophy for products that sees raw materials used indefinitely. The goal is for products to be fully recyclable and to create no waste at end of life.

Cradle to gate; an assessment of a product's impact from raw material supply up to when it leaves the factory.

Cradle to grave; a way of considering and assessing the environmental impact of products from the beginning to end of life, including disposal.

Downcycled; a product or material that comes from post-consumer waste of a higher-grade product.

Downcyclable; a product or material that can be re-used in products or materials of lower grade value or used for energy recovery.

Energy reduction; the amount of energy no longer used or needed to carry out the same processes or tasks.

Environmental Product Declaration (EPD); a product or manufacturer specific third-party verified certificate that evaluates and declares the environmental performance of a product or service on the basis of the principles of ISO 14040 Life Cycle Assessment (LCA) standards.

Greenhouse gas (GHG); gases that contribute to global warming including carbon dioxide, methane, nitrous oxides, etc.

Life Cycle Assessment (LCA); a method for evaluating the environmental impact of a commercial product or service through all stages of its life cycle, from cradle (raw material extraction) to grave (final disposal).

Lower/reduced impact; a product or action that demonstrates a reduced impact on the environment compared to previous products or equivalent products that are currently and widely available, specifically relating to GHG emissions.

Materiality assessment; a robust assessment that identifies and prioritises ESG matters most relevant to a company.

More efficient; a production process that demonstrates less use of air, water and soil resources compared to previous or standard production processes.

More sustainable; a product or action that demonstrates a reduced impact on the environment and/or a positive social impact compared to previous products or equivalent products that are currently and widely available.

Natural; a material or product that is more than 95% by weight from natural resources, e.g., wool or cork.

Nature-based solutions; actions to protect, conserve, restore, sustainably use and manage natural or modified

terrestrial, freshwater, coastal and marine ecosystems, which address social, economic and environmental challenges effectively and adaptively, while simultaneously providing human wellbeing, ecosystem services and resilience and biodiversity benefits.

Net Zero Carbon Emissions; the overall balance between emitting and absorbing carbon in the atmosphere. The outcome of limiting catastrophic climate change requires companies and countries to become net-zero, and many policies are based on achieving that within certain time frames.

Recycled; a material that demonstrates a post-consumer origin, e.g., ocean plastic.

Recyclable; a material that can be recycled in normal household recycling schemes, or for which a recovery scheme exists that allows recycling into product of an equivalent grade.

Reduced/lower emissions; a material or process that demonstrates reduced/lower Greenhouse Gas (GHG) emissions than previous products or equivalent products that are currently and widely available.

Resources; air, water and soil resources used in the production of materials.

Reused; to extend a product's lifetime beyond its intentional designed life span, without changes made to the product or its functionality.

Renewable material; material that is derived from plentiful resources that are quickly replenished by ecological cycles or agricultural processes, so that the services provided by these and other linked resources are not endangered and remain available for the next generation.

Renewable energy; energy from renewable resources including wind and solar, and excluding nuclear and fossil fuels.

Renewable energy source; an energy source that is capable of being replenished in a short time through ecological cycles or agricultural processes

SteelZero; a global initiative bringing together leading organisations to speed up the transition to a net zero steel industry.

Seen a definition we've used that's not listed here?

If you've seen a definition we've used in our communications which isn't listed here, let us know by [email](#).

A word on Impact

Wherever you see 'impact', we use the GRI Standards definition, which states: the effect the organisation has or could have on the economy, environment, and people, including on their human rights, which in turn can indicate its contribution (negative or positive) to sustainable development.

Claims

We engage reputable third-party verifiers and reporting platforms to ensure that our claims are based on accurate data and in-line with global sustainability standards. Our commitment to establishing and verifying green claims via reputable parties involves comprehensive life cycle assessments, empirical testing and industry-standard measurement tools to qualify our emissions and ESG data.

EcoVadis

Rating more than 130,000 companies, EcoVadis is the world's largest provider of business sustainability ratings. It helps us to accurately record, monitor and improve sustainability across the business in line with ESG principles.

EPD International

Linked to the Swedish Environment Research Institute, an independent not-for-profit organisation established by Swedish government and industry, EPD International is an Eligible EPD Programme Operator.

Normative

Normative is a platform that allows us to calculate carbon across Scope 1, Scope 2 and

Scope 3 emissions. Addressing the challenge of managing data from extensive supply chains, it offers automation and precision in processing emissions and quality assurance for data in accordance with GHG Protocol. It is used by a range of large corporations.

Worldfavor

Worldfavor is a platform that helps us to manage data relating to ESG in relation to reporting standards including the EU's Corporate Sustainability Reporting Directive (CSRD). It provides baselines and insights helping us to track our business impact.

SBTi Commitment

The Science Based Targets initiative (SBTi) is a corporate climate action organisation that enables companies and financial institutions worldwide to play their part in combating the climate crisis. Gunnebo Group has committed to set near-term company-wide emission reductions in line with climate science with the SBTi.

SteelZero

A global initiative that brings together leading organisations to speed up the transition to net zero steel. Members make

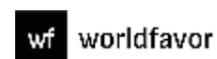
a public commitment to use, procure, specify or stock 100% net zero steel by 2050, with an interim target of using 50% lower emission steel by 2030. This sets a clear roadmap and ambition for SteelZero members to achieve the 100% target.

Where claims are not independently verified by the organisations listed, we will make the origin of the claim clear. To ensure accuracy, our Verified Claims are regularly updated.

ecovadis



Normative



CLIMATE GROUP STEELZERO

Our Impact Scope 1 Claims

“A 13% reduction in Scope 1 CO2e emissions between 2022 and 2023”

“We’ve reduced our Scope 1 carbon emissions by 13% since 2022”

“For 2023, our total Scope 1 emissions were 751.33 tonnes CO2e”

Claim origin: Data is not third-party verified. Claims are based on company data inputted into Normative, an industry-standard GHG Protocol compliant platform that allows us to calculate carbon across Scope 1, Scope 2 and Scope 3 emissions.

Our Impact Scope 2 Claims

“For 2023, our total Scope 2 emissions were 313.15 tonnes CO2e”

Claim origin: Data is not third-party verified. Claims are based on company data inputted into Normative, an industry-standard GHG Protocol compliant platform that allows us to calculate carbon across Scope 1, Scope 2 and Scope 3 emissions.

Our Impact Scope 3 Claims

“A 4% reduction in Scope 3 CO2e emissions between 2022 and 2023”

“We’ve reduced our Scope 3 carbon emissions by approximately 4% since 2022”

“For 2023, our estimated total Scope 3 emissions were 166.8k tonnes CO2e”

Claim origin: Data is not third-party verified. Claims are based on company data inputted into Normative, an industry-standard GHG Protocol compliant platform that allows us to calculate carbon across Scope 1, Scope 2 and Scope 3 emissions.

Our Impact General Claims

“An estimated 4%% reduction in CO2e emissions between 2022 and 2023”

“We’ve reduced our carbon emissions by 4% since 2022”

“In 2023, our total GHG output was 167.8k tonnes, a 4% reduction over 2022 emissions”

“We collect and measure our

emissions according to the Greenhouse Gas Protocol”

“Over the last five years, we’ve reduced the emissions of our vehicle fleet by 8-13% per vehicle”

“Up until the first quarter of 2024, the solar panels installed at our Cominfo plant have produced approximately 47,439kWh of renewable energy”

“Through LED lamps on the factory floor, we cut down energy consumption by 14% (2022-2023) at our Lavis plant” (2022-2023)”

“A drive to improve awareness on heating saw natural gas consumption fall by 23% (2021-2022) in just a year at our Lavis plant.

Claim origin: Data is not third-party verified. Claims are based on company data inputted into Normative, an industry-standard GHG Protocol compliant platform that allows us to calculate carbon across Scope 1, Scope 2 and Scope 3 emissions.

“Renewable energy is harnessed to power our sites in Lavis, Italy and Maresfield, UK”

“In 2023, 55% of the total energy needed to power nine sites around the world came from sustainable sources”

“We use 100% renewable energy at our assembly sites in Lavis, Italy and Maresfield, UK”

Evidence: Certificates from Energy Supplier (supplied on request)

“We’re transitioning to 50% low emission steel by 2030 and 100% net zero steel by 2050”

“Our membership of SteelZero puts us on a pathway to using net zero steel by 2050”

“As one of the top five emitting materials in our purchased goods, reinforced steel accounts for around 20% of total CO2e emissions, so moving towards low emission steel will represent a significant reduction in our impact.”

Evidence: SteelZero membership

**Our Business
General Claims**

“60% of production facilities are ISO 14001 certified”

“100% of production facilities are ISO 9001 certified”

“60% of production facilities are ISO 45001 certified”

“We’re ISO 27001 certified at our Maresfield and Comfino production plants”

Evidence: Certificates from approved certification body (supplied on request)

“We’re actively working in progressing 10 UN Sustainable Development Goals”

Evidence: Commitment to SDGs 4, 5, 7, 8, 9, 11, 12, 16, 17 as made in the [Gunnebo Sustainability Strategy](#).

**Our People
General Claims**

“Our senior leadership team is made of 33% women”

“33% of our Senior Leadership Team identify as women”

“In 2023, we recorded zero incidents of bribery and corruption”

“In 2023, we received zero complaints of customer privacy breaches”

Claim origin: Claims are based on company data inputted into Worldfavor, an industry-standard platform to manage data relating to ESG in

relation to reporting standards including the EU’s Corporate Sustainability Reporting Directive (CSRD).

Product Claims

“Our SpeedStile FLs BA 1200 gate has a third-party verified EPD to help you assess its impact”

“The third-party verified EPD available on our SpeedStile FLs BA 1200 examines the cradle to grave life cycle of the gate over a 10-year operation”

“The total GWP of our SpeedStile FLs BA1200 from cradle to gate is 1,223kg CO2e”

Evidence: Third-party verified EPD Document S-P-08912 by EPD International. [Available to view here](#)

“We are assessing the environmental and social impact of our products in order to create a sustainable design framework to produce products that reduce impact on people and the planet”

Evidence: As reported in the [Gunnebo Sustainability Strategy](#).

Use of Imagery & Colour

We recognise the powerful impact of visual representation in shaping perceptions. Therefore, we uphold the following principles related to the use of imagery and colours in our marketing materials:

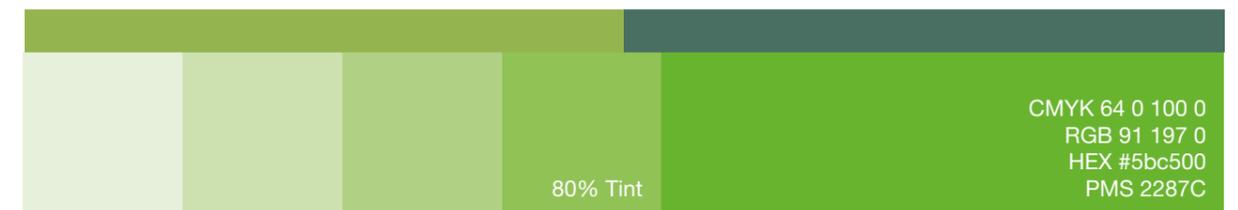
Colour

We have a selected green specifically for use in sustainability communications. Our content values of honesty and transparency means this green should only be used for sustainability communications.

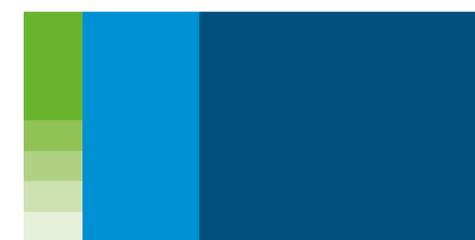
It should not be used on products, product packaging, product information, product marketing, or other marketing materials that are not related to sustainability.

It should be used sparingly, as an emphasis to highlight key information with our approved brand colours always being dominant.

Colour Reference



Use Ratio



This example shows an acceptable ratio for the use of the green in documentation



This example shows an unacceptable ratio for the use of the green in documentation

Colours in the Gunnebo Sustainability Approach

The Gunnebo Sustainability Approach identifies three colours used for actions taken by the business under three pillars.



These colours may be used to highlight respective actions within each pillar.

Imagery

Imagery can be used to support sustainable messaging, but it can also mislead if it is not an honest representation of the product, our processes, actions or our external environments.

When considering the visual design of content, we avoid using colours or images that do not represent the product, process, action or environment honestly, transparently and fairly. We avoid the use of general stock imagery if it gives an inaccurate representation of our products, processes, actions or environments.

Highlighting Actual Efforts

When showcasing our sustainability projects or achievements visually, we will

only use images from actual initiatives we have undertaken, avoiding generic or unrelated imagery that may give a false sense of our environmental impact or efforts.

Transparency in Photo Alteration

Any alterations or edits to photos that may change the reality or context of our green initiatives will be clearly disclosed. This includes adjusted or enhanced elements, exaggerated effects, or other changes that might give a misleading impression.

Cultural & Environmental Sensitivity

We ensure that any imagery used respects the cultural,

environmental, and socio-economic context of the regions or communities depicted. This includes avoiding imagery that may be perceived as appropriating or misrepresenting cultural or environmental elements.

Educative Infographics

Where possible, we will use visual aids such as infographics to simplify and convey complex sustainability data or concepts. These visuals will always be based on substantiated facts and will be designed in a manner that is easy to understand without misrepresenting the information.

awaiting image

Sustainable Image Library

For colleagues, we have developed a library of approved images that can be used to support sustainability communications.

[Email the sustainability team for access](#)



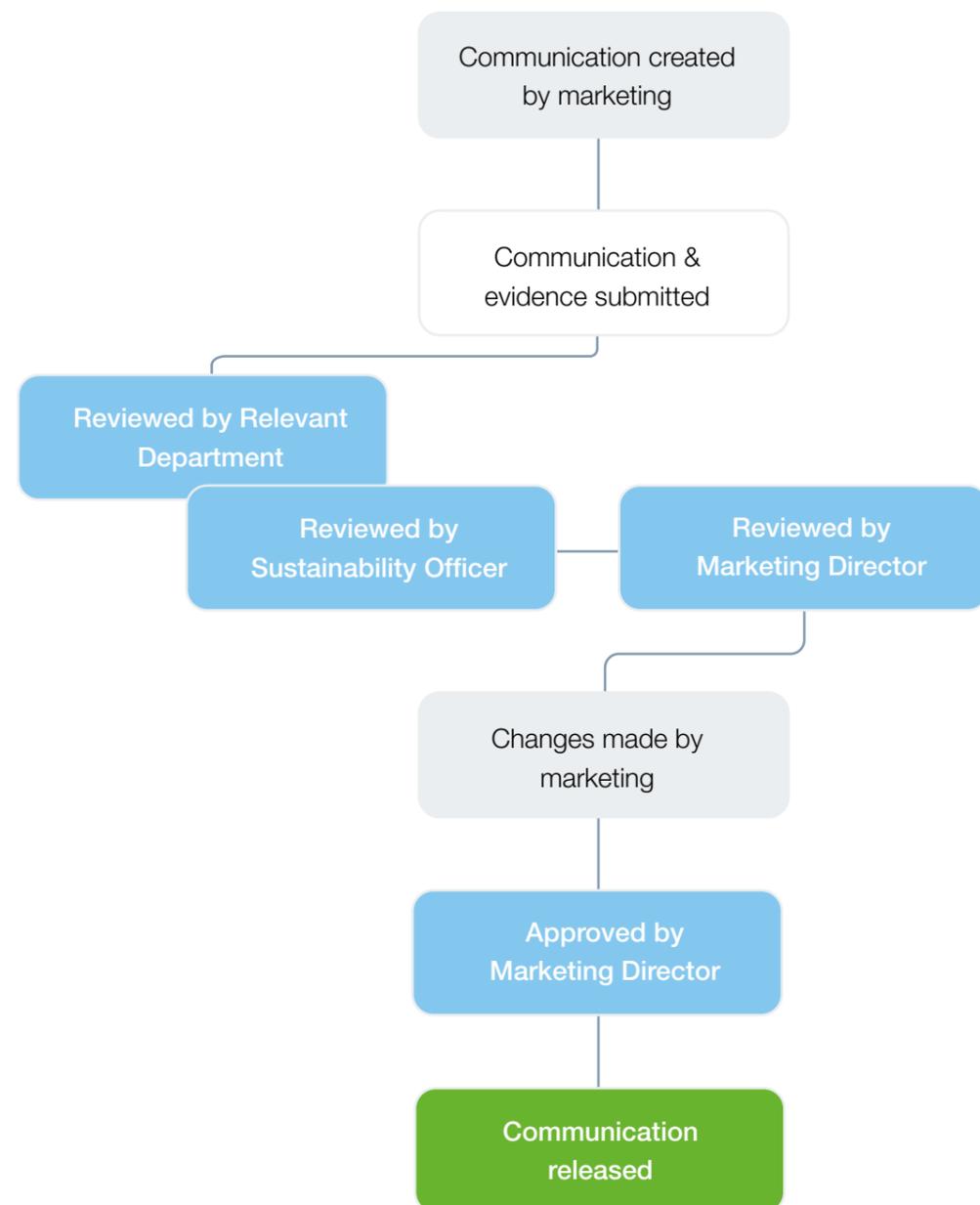
These are authentic and original images from Gunnebo that show products in real world application and accurate depictions of manufacturing and external environments.



These examples and stock images show misleading representation of products, how they are made and their impact on the environment.

Editorial Processes

We have a full editorial review for procedure every piece of content and their green claims before publication and distribution. When writing content, our team refers to our list of clearly defined terms and verified claims, updating the lists when using a new term or claim. We recognise and reward staff members who challenge our green claims.



Training

All new employees receive an in-house training session on our Green Claims Policy and The Anti-Greenwash Charter so they fully understand the issues and benefits, this will be done in Onboarding as well as regular bite-size learnings via Nano-learning. We also ensure we improve the awareness of sustainability throughout our organisation by the following activities:

General Sustainability Training

All employees undergo e-learning via our Learning Management System (DRIVE) on sustainability and sustainable business practices. As part of this, the training covers key ESG topics: anti-bribery and corruption, diversity and inclusion, health and safety. From 2025, all employees will engage with virtual bite size learning on sustainability every other month.

Sustainability Champions and QHSE Professionals

We have a programme of Sustainability Champions within every department. Alongside QHSE professionals, they undergo specialised sustainability training throughout

the year including educational pieces from external speakers and workshops on circular economy, communicating about sustainability and other topics material to the business.

Product Development, R&D & Technical Departments

Undergoing training on Product Life Cycle Assessments and EPDs with One Click LCA and taking part in yearly sustainable design and manufacturing workshops, our product development, R&D and technical departments receive specialist knowledge in order to create a sustainable design framework for products that reduce impact.

Sales Department

Every sales person across the globe is required to watch and listen to a pre-recorded webinar with an interactive quiz on The Anti-Greenwash Charter and greenwashing as it pertains to our business.

Marketing Department

The marketing team will undertake the following specialist training on sustainability, greenwashing and communications:

Onboarding workshop on identifying anti-greenwashing and using the principles of the Charter

Yearly workshop on sustainable communications

Certified Carbon Literate through training with the Carbon Literacy Project (2025-2026)

Sustainability Team

The sustainability team will undertake the following specialist training on sustainability, greenwashing and communications:

Yearly workshop on sustainable communications

Certified Carbon Literate through training with the Carbon Literacy Project

Customer Engagement

We aim for fair, honest and transparent sustainability communications at all times. In this way we uphold the goal of our brand values to build trust with our customers. Our commitment is resolute and essential to being a responsible business.

For customers of Gunnebo Entrance Control, as a company they trust to do business with, it is supposed that we are acting responsibly by operating in ways that are ethical and which support the wellbeing of our employees. In communicating with customers, it is important that we uphold this level of responsibility on topics concerning the environment and people, and that we're held to account for the communications we produce.

Insights & Feedback

We know our customers are invaluable in our fight against greenwashing, which is why we commit to answering any emails about our green claims within three working days.

All complaints or questions about our communications can be submitted for review and resolution via our [website](#).

Questions or Feedback on this Policy?

If you have any questions or feedback on this policy or our green claims, please email [Kelsey Parsons](#) for clarification, or alternatively submit any greenwashing concerns directly to The Anti-Greenwash Charter for independent review [here](#).

Partnerships & Collaborations

We are dedicated to promoting sustainability and responsible marketing practices across our network of partners and collaborators and actively engage with them to encourage alignment with our sustainability values and the principles outlined in this policy.

This engagement involves training on The Anti-Greenwash Charter and the dissemination of our Sustainability Communications Strategy, whilst also sharing knowledge and resources to enhance their understanding and implementation of responsible marketing practices.

We uphold transparency in all our partnerships. Clear communication about the sustainability efforts of our collaborators is essential. We inform our stakeholders about the sustainability credentials of our partners, reinforcing our commitment to upholding our sustainability goals and public commitments, and encouraging a broader adoption of responsible marketing practices.

All suppliers have access to our sustainability documentation

including the Committed to Action brochure, Sustainability A-Z, and any policies and strategies on request. We host regular supplier webinars on topics to provide suppliers with the knowledge to act on sustainability, as well as how to communicate on it using our anti-greenwashing principles.

Through the SteelZero partnership, our steel suppliers are provided with information on our targets and actions on how we are working to transition towards low emission steel.

Global Partner Network

As a Gunnebo Global Partner – and member of the Global Partner Network (GPN) – suppliers work with us to meet and exceed our targets in delivering and servicing our world leading entrance control systems for customers around the world.

In the Gunnebo Entrance Control Digital Asset Management centre, the GPN has access to our bank our approved images, documentation (EPDs, Product sustainability credentials and our Committed to Action Brochure).

The Global Partner Network has specific guidelines based on our Sustainability Communications Strategy that they are asked to follow to ensure transparency, honesty and fairness. They will be subject to random yearly spot checks to ensure accurate communications of GEC's sustainability credentials. GPN has a dedicated Sustainability Champion to assist with any information needed for communications and collaboration support.

In the fourth quarter of every year, we hold a Sustainability Communications and Business webinar with the GPN to educate on our credentials and to provide knowledge on sustainability communications and anti-greenwashing.

Regular Reviews

We carry out quarterly internal audits of our content and check all our references are up to date. During this audit, we also check for new developments in the industry that we can benchmark against:

Being a signatory of The Anti-Greenwash Charter is a continuous process; as such, we review our marketing practices annually to ensure we are still compliant with any changes to the Charter.

Policy Governance

The Global Sustainability Officer is responsible for establishing and following practices, instructions and operating models in line with the Green Claims Policy and for ensuring compliance across the business with this policy.

Any non-compliance with this policy will be brought to the attention of the Global Marketing and Sustainability Director, who has overall responsibility for this policy. They will decide on further actions and whether the matter should be escalated further and will also ensure that the Green Claims Policy is reviewed twice a year.

Independent Reviews

As a committed signatory of The Anti-Greenwash Charter, we actively engage in an audit process to ensure compliance with our Green Claims Policy. This process includes providing evidence of effective implementation of our practices and procedures during a thorough quarterly review, conducted by The Anti-Greenwash Charter, of a marketing campaign focusing on our green credentials, as outlined in our annual marketing plan.

These periodic assessments are vital in demonstrating our dedication to upholding responsible marketing practices. Moreover, we recognise and accept that all audit reports will be appended to our Green Claims Practice (GCP) for public review, ensuring an added layer of transparency and accountability. We are fully aware that any instances of non-compliance may result in the revocation of our certified signatory status, underscoring the importance of continuous compliance and transparency in our operations.

Verification of Claims

Wherever possible, we verify our claims with third-party involvement, such as through EPD certification bodies. Any claims that are not third-party verified are made from data validated through submission to industry standard platforms in accordance with regulatory compliance, such as the GHG Protocol, SBTi, Corporate Sustainability Reporting Directive and other applicable frameworks.

Recognising Room for Improvement

We are committed to becoming a more sustainable business and communicating fairly, honesty and transparently on our sustainability actions, including both positive and negative impacts. However, we also recognise that our knowledge and understanding of environmental and climate science, issues surrounding greenwashing and other topics are continually evolving.

As a business, we currently recognise that there are areas of improvement needed in our sustainability actions, reporting and communication and commit to improving in these areas:

Value chain transparency

We recognise the need to improve transparency across the value chain. Not only is there a need to improve our own data collection and validity, but also to understand the full impact of our business throughout the value chain. A key area of focus is to approve our understanding of Scope 3 emissions and collaborate with suppliers and customers to improve this area.

Supply chain awareness

We know that for some of our suppliers, understanding sustainability and their responsibility to the planet and people, as well as compliance and the regulatory landscape can be a challenge, particularly as they are constantly changing. It is our responsibility to ensure that we work with our suppliers to improve knowledge and champion collaboration, so that they can take positive action in reducing their impact.

Supply chain action

We recognise that the move towards reducing emissions needs to accelerate throughout our supply chain if we are to achieve our aim for a net zero business by 2045. Through industry collaboration, policy pressure and product innovation we have an active role in encouraging action throughout the supply chain.

Internal awareness

We recognise there is room for improvement in our colleagues' understanding of climate related topics and enablement to make positive changes within daily roles. Through advocacy and

training we hope to build better knowledge of sustainability for all colleagues in the business, so that they share our ambition for a more sustainable business and a better future for everyone.

Product environmental impact transparency

We recognise the need to improve availability of third-party verified EPDs across our products. We are developing a programme of acceleration for EPDs with a recognised provider.

Improving the availability of EPDs for our customers will help them to implement better sustainable practices. Conducting life cycle analysis for more of our products will also help us to identify areas where we can improve and innovate, creating solutions that are developed with priority to safety and sustainability.

End of life understanding

We recognise a gap in our knowledge when it comes to end of life for our products and what happens at the point of disposal. There is a programme of improving understanding

at this stage of the product life cycle and ways that the environmental impact can be minimised.

Engaging on sustainability with end users and customers

We recognise the need to engage with end users and customers on the topic of sustainability and its importance in securing a good future for the planet and its people.

By communicating with them on product and business sustainability and the impact of human activity on the climate, we have the possibility to add to their positive actions and contribute to stopping climate change. It is also important for us to communicate that we have the potential to bring security and sustainability into the everyday lives of our customers.

Customer education

As signatories of the charter, we recognise our need to educate our customers on greenwash, as well as supporting them with information fair, honest and transparent information that is based on verified claims. Currently, we don't have a programme of action for education of our customers in place but will look to implement one.

A Word on Target Setting

It is our intention to set targets for areas of improvement in future editions of this policy.

We commit to setting at least one actionable target in the next edition of this policy.

Outside of our Green Claims Policy and status as a Certified Signatory of The Anti-Greenwash Charter; we are committed to taking action to be a leading ethical business, to empower our people, and aim to reach net zero emissions by 2045. Our approach to sustainability is defined by actions taken by our business under three pillars:

Want to understand more on our position?

Our position on sustainability is developed from Gunnebo's Sustainability Approach.

[Find out more here](#)

Our Business

We are committed to our business through ensuring high ethics in everything we do, fostering a sustainable supply chain with our suppliers and safeguarding high data security the security and privacy of our customers and employees.

Our Business Targets:

- 100% ISO 14001 certified in production plants by 2026
- Zero incidents of bribery and corruption
- Ensure that 100% of suppliers adhere to code of conduct

Our People

We are committed to empowering our people through providing safe, inclusive and diverse working conditions, fostering widespread employee development and training and supporting community initiatives.

Our People Targets:

- Zero fatalities in the workplace
- Zero incidents of discrimination
- 30% of senior leadership team comprised of the minority gender by 2026
- 100% of employees trained on sustainability topics by 2026
- Increase workforce diversity by 20% by 2030

Our Impact

We are committed to reducing our impact on the environment through promoting principles of circularity and resource efficiency within our operations and products and strive to be Net Zero by 2045.

SBTi Targets:

- 50% of global fleet run on electric by 2030
- Powered by 100% Renewable Energy by 2030
- Net Zero by 2045

Own Targets:

- Increase waste diversion from landfill by 15% by 2026
- Reduce emissions intensity by 20% per product by 2030
- 100% of product portfolio has an EPD by 2030
- Aim to achieve Net Zero Emissions by 2045

SteelZero Targets:

- We commit to procure, specify or stock 50% low emission steel by 2030
- We commit to procure, specify or stock 100% net zero steel by 2050



The Anti- Greenwash Charter

Certified Signatory

If you have any questions
about this document, contact
our sustainability team at:
sustainability.ec@gunnebo.com