



Policy

Third-Party Code of Conduct

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Legal and Compliance

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Table of Content

1. Introduction	3
2. This Code and Local Law.....	3
3. Applicability.....	3
4. Obligations	3
4.1 Work Environment	3
4.2 Intellectual Property	3
4.3 Personal Data Protection and Privacy	4
4.4 Corruption, Bribery and Kickbacks.....	4
4.5 Money-laundering	4
4.6 Anti-discrimination and Anti-harassment.....	4
4.7 Fair Business, Advertising and Competition	4
4.8 Antitrust, Unfair Competition, and Trade-regulation Laws.....	4
4.9 Responsible Technology Policies.....	5
4.10 Environmental Protection.....	5
4.11 Human Rights.....	5
4.12 Trade Compliance	5
5. Further Information	5
6. Document history.....	5
Appendix 1	6
Appendix 2	7

1. Introduction

Milestone Systems is a global leader in video technology software. Our product portfolio includes the award-winning XProtect® video management software (VMS), BriefCam advanced analytics platform, and Arcules video surveillance as a service (VSaaS).

We have adopted this Third-Party Code of Conduct (“Code”), with the purpose of providing the essential guidelines on legal and ethical responsibilities that we expect of anyone we do business with and encourage the adoption thereof.

2. This Code and Local Law

As a global company, Milestone must follow the laws of many countries. If a section of this Code conflicts with applicable local law, the law takes precedence. Where local law, or the national interpretation and/or implementation of national law or regulation, appears to be in conflict with our Human Rights Policy, we will work to resolve this conflict as far as is possible, bearing due respect to both standards. If and when such conflicts arise, we will seek to communicate transparently on our approach in our public reporting, as far as is possible.

3. Applicability

At Milestone we expect anyone we do business with to comply with the standards of business conduct described in this Code. We encourage anyone to adopt this Code directly or by adopting the same standards in their own versions of a Code of Conduct. To adopt this Code, anyone can simply declare its support, for example by adding such declaration in the form of a contract clause.

We encourage anyone, whether an employee or not, who wishes to report a violation of the Code to do so. For strictly confidential reporting under our whistleblower scheme, please visit Milestone’s Whistleblower Portal. We have adopted a whistleblower policy for this purpose.

4. Obligations

4.1 Work Environment

The work climate must be free from discrimination and harassment based on race, religion, gender, sexual orientation, age, national origin, disability, marital status, veteran status, any other status protected by applicable law.

At Milestone we have additional specific policies that govern sexual harassment, discrimination and other forms of harassment. These policies provide illustrations of prohibited forms of conduct and set forth procedures for reporting, investigating and addressing complaints of improper conduct.

4.2 Intellectual Property

Intellectual property rights shall be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information shall be safeguarded.

4.3 Personal Data Protection and Privacy

At Milestone we must comply with all applicable data protection legislation and the EU regulation 2016/679 on General Data Protection Regulation (“GDPR”). Milestone handles any personal data collected by about third parties according to our Privacy Policy. The Privacy Policy can be found here: [Privacy Policy](#)

4.4 Corruption, Bribery and Kickbacks

Corruption can be defined as the abuse of one’s role to obtain an undue advantage. Anti-corruption laws generally prohibit bribery, kickbacks and facilitation of payments. Many countries have laws related to bribery and improper payments, including the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act, both of which have global reach and worldwide implications.

In addition to bribery, many countries, such as France, Brazil, and Mexico, make influence peddling illegal. Influence peddling is using someone’s influence or position to gain or attempt to gain a business advantage in exchange for money, gifts, or favors.

Milestone does not tolerate corruption and/or bribery in any form, and we do not tolerate influence peddling in any form.

4.5 Money-laundering

Money laundering is an attempt by individuals or organizations to hide or disguise the proceeds of criminal activity (such as fraud, terrorism, drug dealing, illegal arms trade, corruption, human trafficking, etc.) through a series of otherwise legitimate business transactions. At Milestone we do not tolerate money-laundering in any forms.

4.6 Anti-discrimination and Anti-harassment

At Milestone we do not tolerate unlawful harassment and discrimination on the basis of an individual’s race, ethnicity, creed, color, religion, ancestry, gender, gender identity or expression, national origin, citizenship, genetic information, sexual orientation, marital status, pregnancy, childbirth or related medical condition, veteran status, age, disability, or other characteristics protected by law (collectively, “protected characteristics”). This commitment is reflected in all of our employment practices, including decisions about recruiting, hiring, training, promotions, pay and benefits. Our harassment-free workplace policy extends to our suppliers, customers and anyone who does business with us and applies in both work-related settings and work-sponsored activities.

4.7 Fair Business, Advertising and Competition

Standards of fair business, advertising, and competition shall be upheld.

4.8 Antitrust, Unfair Competition, and Trade-regulation Laws

Milestone is fully committed to free, fair, and open competition in the global marketplace, and anyone Milestone does business with must conduct their business in full compliance with all applicable competition and antitrust laws and regulations. Partners shall compete fairly and independently in the market and must not engage in any practices that unlawfully restrict competition.

Partners must determine independently their own resale prices and other commercial terms for the supply of Milestone products. Milestone expects all its partners to maintain high ethical and legal standards in all competitive activities.

4.9 Responsible Technology Policies

At Milestone we are committed to responsible technology, and we recognize our responsibility to respect the human rights of anyone impacted by our products. It is important to us that anyone we do business with is committed to help ensure that emerging technologies are only used for the benefit of society. We work according to five Responsible Technology Principles:

- **Accountability:** To ensure that our technologies are subject to human control and overview
- **Transparency:** To explain our technologies and provide understanding of their intended use
- **Fairness & inclusion:** To ensure that our technologies are free from harmful bias
- **Privacy:** To respect the privacy rights of people and communities
- **Security:** To protect confidentiality, integrity, and availability of our technologies

4.10 Environmental Protection

To help leave a prosperous planet for future generations recognizing that the Earth is irreplaceable, Milestone and anyone it does business with must strive to develop and provide environmentally conscious software products as well as tackling environmental issues such as climate change and carbon emission on a global scale. Together we strive to continuously reduce environmental impact by endeavoring, for example reduction of energy consumption, reduction of the amount of waste, use of green renewable electricity only, support of recycling of materials, use of eco-friendly means of transport and set environmental requirements in purchase of goods and services.

4.11 Human Rights

At Milestone our commitment to respect human rights includes all internationally recognized human rights, including those enshrined in the Universal Bill of Rights, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights, the core conventions of the International Labour Organisation and its Declaration on Fundamental Principles and Rights at Work, international humanitarian law principles and customary international law. We also seek full alignment with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles for Business and Human Rights.

4.12 Trade Compliance

Milestone is committed to complying with trade compliance laws and regulations in the territories that we operate in. We expect anyone we do business with to comply with trade compliance requirements.

5. Further Information

Milestone may update or amend this policy at any time.

6. Document history

Doc#	Date	Changes	Owned by	Approved by
1	11 December 2025	Initial version	LCRM	Board of Directors
2	February 2026	Aligned with Canon policy and updated Milestone values	LCM	Executive Directors

Appendix 1

Corporate philosophy of ‘Kyosei’:

Canon’s corporate philosophy is “Kyosei”, which can be translated as “living and working together for the common good”.

Kyosei lies at the heart of our brand and business activities. It shapes our mission and values, the way we treat our people and conduct our business.

Our basic ethos is to contribute to the prosperity and well-being of the world whilst striving to become a truly excellent global company that achieves continuous corporate growth and innovation.

San-ji (Three ‘Selfs’) Spirit

The San-ji Spirit underpins Canon’s universal guiding principles that have been passed down since Canon was founded. This provides the basis for all our actions.

The “Three Selfs”

1. Ji-Hatsu, or Self Motivation: to take initiative and be proactive in everything we do.
2. Ji-Chi, or Self Managing: to conduct ourselves responsibly and be accountable for all our actions.
3. Ji-Kaku, or Self Awareness: to understand the situation, position, and role in which we are placed.

Appendix 2

Milestone Values:

We act with integrity. We grow together. We are curious.

Milestone's values reflect who we are today and who we aspire to be. They are simple, clear, and action oriented, designed to guide everyday decisions, strengthen collaboration, and make it easier for all of us to move in the same direction.

These values build on the strengths we already have as a community and give us a shared language for how we show up for each other and for our customers. You will see them woven into how we communicate, collaborate, and lead, as behaviours we practise and recognise in daily moments.



About Milestone Systems

Milestone Systems is a world leader in data-driven video technology used in industries as diverse as manufacturing, airports, law enforcement, retail, and traffic management. We provide a clear picture of how to create a safer, better and more prosperous world. Our XProtect video management software, BriefCam AI-powered analytics, and Arcules cloud VSaaS help our customers learn from the past, understand the present, and predict the future. Founded in 1998 and headquartered in Copenhagen, Milestone employs more than 1,500 people worldwide and has been an independent company in the Canon Group since 2014. For more information visit: www.milestonesys.com

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