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CREATIVA SECURITY CONSULTING - WEAPONS AND ARMOURED TRANSPORT POLICY

*INSTITUTIONAL POLICY OF THE CREATIVA CENTER UNIVERSE (CCU)
CIVILIAN, LAW-COMPLIANT, AND MINIMALLY INTRUSIVE PROTECTIVE
MEASURES*

CREATED BY
EUSL AB
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Weapons and Armoured Transport Policy

INTRODUCTION

This Policy establishes the legal, ethical, and operational framework governing the possession, use, coordination, and oversight of weapons and armoured transport within the Creativa Center Universe (CCU). Its organising philosophy is based on three principles: minimal force, strict legal compliance, and maximal reliance on lawfully authorised local partners when protection requirements exceed what is permissible for private civilian actors.

The Swedish Police Authority maintains exclusive regulatory authority over firearms licensing, import, export, and possession, with every firearm requiring an individual licence, and any commercial trade in firearms requiring separate permits. Firearms ownership in Sweden is tightly restricted, recognised as a privilege requiring demonstrated need, suitability, background checks, and compliance with extensive storage and transport obligations. This environment frames the default posture of CCU operations: Creativa personnel do not carry weapons, and all armed safeguarding is delegated to actors authorised under domestic or host-country law.

Within the European Union, firearms acquisition and possession are regulated through Directive (EU) 2021/555, which imposes minimum standards and prohibits private possession of certain high-risk categories of firearms. Member States may adopt more stringent restrictions; Sweden does so, resulting in an even narrower window for lawful private weapons use. Internationally, firearms imports and exports are subject to strict EU-level controls under Regulation (EU) 2025/41, addressing the international movement of firearms, essential components, and ammunition. These frameworks collectively reinforce the core CCU doctrine: armed protection abroad must be executed exclusively by licensed local providers, never by Creativa staff.

Armoured transport is treated as a defensive, legally permissible, civilian protective measure. Armoured vehicles are considered ordinary vehicles under Swedish law for purposes of registration and licensing, but importation and registration must follow the procedures established by the Swedish Transport Agency (*Transportstyrelsen*) and Swedish Customs (*Tullverket*). Importation requires verification of origin, customs clearance when sourced outside the EU, and compliance with road-use requirements, insurance, and traffic-safety obligations.

This Policy therefore codifies the strict boundaries, lawful procedures, and governance protocols governing CCU's use of weapons (through external actors only) and armoured vehicles (as a lawful, civilian protective asset).

CHAPTER 1 — LEGAL FRAMEWORK

Weapons, armed protection, and firearms-related decision-making in CCU operations are governed by a multi-layered legal architecture: Swedish domestic law, EU law, and host-country law. Under Swedish jurisdiction, the foundational statute is the Swedish Weapons Act (Vapenlagen, SFS 1996:67) and its implementing ordinance, the Weapons Ordinance (Vapenförordningen, 1996:70), which collectively regulate ownership, possession, transport, import, export, and trade in firearms. Civilian firearm possession requires an individual licence for each firearm, justified by hunting, sport shooting, or other legally accepted purposes; no licence exists for private armed security duties.



EU law provides additional constraints. Directive (EU) 2021/555 codifies minimum standards for civilian firearms possession across the Union, including categorical bans on certain semi-automatic weapons, enhanced traceability requirements, and strict controls on cross-border transfers. EU Regulation 2025/41 further governs import, export, and transit of firearms and ammunition, implementing international obligations under the UN Firearms Protocol. Taken together, these frameworks prohibit Creativa personnel from carrying weapons for protective purposes within the EU.

Internationally, foreign jurisdictions may permit armed escorts, but local law typically restricts such roles to licensed local security companies or state authorities. COMESA, SADC, and EAC legal frameworks regulate economic integration and competition, but do not create cross-border licences for private armed activity; each Member State retains sovereign control over its security laws. Accordingly, the lawful path for CCU is coordination, not execution, of armed activities in foreign jurisdictions.

The movement and use of armoured vehicles fall under Swedish and EU transport rules rather than weapons law. To be road-legal in Sweden, vehicles must be registered, insured, and licensed for use; imports must undergo verification of origin and customs/VAT clearance. Armoured modifications do not create additional legal restrictions unless the vehicle contains prohibited equipment regulated under export-control law (e.g., military-grade armour in certain contexts). Sweden's strategic export-control regime distinguishes between civilian armoureding and military equipment; the latter is controlled under the Military Equipment Act. CCU must therefore ensure that all armoured vehicles and materials are classified as civilian, not military goods.

CHAPTER 2 — WHEN WEAPONS MAY BE REQUIRED

Weapons may be required only in **high-risk environments** where host-country law permits armed protection and where risk assessments justify such measures. Common scenarios include:

- protection of high-value ECHO modules during overland transport in jurisdictions with elevated cargo-theft risk;
- movement of executives or technical teams through areas with documented criminal or insurgent activity;
- political or civil instability that raises the probability of targeted or opportunistic attacks.

Even in these conditions, Creativa personnel do not carry weapons, as Swedish and EU law do not provide any licensing framework for private armed security operations. The Swedish Police Authority issues firearms licences only for hunting, sport shooting, collecting, or specific professional trades (e.g., gunsmithing). Protective or security purposes are not lawful grounds.

Accordingly, armed functions in foreign jurisdictions must be performed exclusively by:

- **Licensed local private security companies** holding appropriate firearm authorisations under host-country law;
- **State-provided escorts**, such as police or military units, where authorised and appropriate.

The EU's firearms regime, which restricts acquisition and possession of high-capacity and automatic weapons even for civilians engaged in lawful activities, reinforces the absolute prohibition on CCU personnel carrying or managing weapons.



In short: weapons may be required, but never by Creativa hands. The Company's legal role is to conduct risk assessments, select vetted local partners, define movement doctrine, and maintain command-and-control over timing, routing, and communications.

CHAPTER 3 — ARMoured TRANSPORT IN SWEDEN

Swedish law permits the civilian use of armoured vehicles, provided that they comply with roadworthiness, registration, insurance, customs, and taxation requirements. The Swedish Transport Agency mandates that any vehicle used on public roads must be licensed for use, insured, and registered in the national vehicle registry. If imported, the vehicle must undergo verification of origin and—if from outside the EU—customs clearance through the Swedish Customs Authority.

Armoured modifications do not trigger firearms regulations; armour is not classified as a weapon. However, Sweden's export-control and military-equipment regime distinguishes between civilian ballistic protection and military-grade armour, the latter falling under the Military Equipment Act and subject to strict licensing for export or import. CCU must therefore procure civilian-grade, non-military armoured vehicles to avoid triggering defence-material regulations.

In Sweden, armoured transport is considered a lawful, defensive measure for:

- transporting executives in environments with elevated threat indicators;
- moving high-value equipment or sensitive documents;
- supporting EUOS properties under specific threat assessments.

Vehicles must meet all normal safety inspections and must be operated by trained drivers. Insurance policies must reflect the vehicle's value and modification level, consistent with Swedish commercial vehicle insurance norms.

The absence of armed private escorts in Sweden places heightened importance on route selection, timing control, surveillance-free staging, radio discipline, and coordination with the unarmed licensed guarding services overseen by the County Administrative Board under *Lag (1974:191)*

CHAPTER 4 — ARMoured TRANSPORT ABROAD

Armoured transport outside the European Union is organised as a lawful, civilian protective measure that respects host-country sovereignty, customs, and road-traffic regimes, and is integrated—where required—with licensed local armed escorts or state-provided protection. COMESA, EAC, and SADC frameworks do not create any supranational licence for private armed security; each Member State retains its own police powers and security-service licensing, necessitating local legal validation and contractual engagement for escorts or convoy protection.

When armoured vehicles are exported from the EU or temporarily deployed abroad, Creativa ensures full compliance with European customs formalities and the applicable EU regimes governing the cross-border movement of controlled goods, noting in particular that firearms and related items are subject to EU import/export controls under Regulation (EU) 2025/41—even though the vehicles themselves are civilian assets and not weapons. Where a host country requires importation or temporary admission procedures for vehicles, the deployment follows local customs and road-registration rules analogous to Sweden's own verification-of-origin and licensing approach, with documentary proof of ownership, insurance, and roadworthiness forming part of the dossier.



Storage and lay-down areas for armoured vehicles must comply with host-country safety and insurance requirements; in addition, if Creativa or its EU processors collect personal data in the course of dispatch control, telemetry, or driver logs, such data are processed under GDPR to the extent that Creativa remains a controller or processor established in the EU, requiring lawfulness, minimisation, and defined retention, even when the travel occurs outside the Union. Airport and port interfaces require pre-cleared custody chains and alignment with local authorities; where the risk threshold demands armed protection, escorts are contracted through licensed local companies or provided by competent state units under written terms defining scope, reporting, and termination.

Driver and crew composition follow host-country licensing rules and insurer stipulations. Local drivers are used where required by law or where local conditions, road practices, or police-checkpoint protocols make this operationally prudent; Creativa personnel serve as unarmed coordinators, maintaining itinerary control, communications integrity, and escalation discipline. Where transfers of firearms are involved for partner escorts (for example, the host-country provider's arming), EU parties remain subject to EU firearms transfer and traceability rules in their own jurisdictions, reinforcing the prohibition on Creativa moving or possessing weapons as part of its protective posture.

CHAPTER 5 — INTERNAL RULES AND PROHIBITIONS

Creativa personnel do not carry weapons in Sweden, the EU, or abroad. Swedish law permits firearm possession only on individually licensed grounds such as hunting or sport shooting and assigns licensing authority to the Swedish Police; there is no private-security exception that would authorise Creativa to arm staff for protective purposes. EU law further constrains civilian access to certain categories of firearms and imposes strict standards on acquisition and possession, which Member States like Sweden implement with additional stringency.

The following prohibitions are absolute. Creativa personnel shall not: purchase, import, possess, transport, store, or deploy firearms or ammunition for protective activities; request, receive, or exercise control over state-issued weapons; or perform any act reserved for public authorities, including arrest, detention, or use of coercive force beyond lawful self-defence under local criminal law. These limitations reflect Sweden's firearms licensing regime, the EU's civilian firearms framework, and the host-country reservation of policing powers.

Any lawful armed component required abroad is delivered exclusively by licensed local private security companies or competent state authorities under written contracts that specify scope, code of conduct, reporting, and termination rights. COMESA's legal instruments and institutions do not supersede Member States' security laws; therefore, local licensing and authorisation remain determinative for armed escorts and convoy protection.

Finally, no weapon, component, or ammunition may be exported, imported, or transferred by any Creativa entity in a manner that would fall within EU firearms-transfer regimes without express legal advice, regulatory approval where required, and documentary compliance with applicable EU and national controls.

CHAPTER 6 — OVERSIGHT AND ACCOUNTABILITY

Oversight is exercised through a layered structure that integrates Swedish licensing oversight for security operations, GDPR accountability for any personal-data processing associated with transport or surveillance, and systematic work-environment duties toward staff engaged in protective transport. In Sweden, County Administrative Boards supervise licensed private-security activities and personnel



approvals; changes to key posts (e.g., the operational manager) and annual returns are subject to mandatory notifications and reviews.

Where camera systems, access logs, telematics, or journey data are used in connection with armoured transport, Creativa maintains records of processing, minimises data collection, enforces retention limits, and performs DPIAs where risk is high, consistent with GDPR and Sweden’s Camera Surveillance Act and with IMY’s post-April 2025 guidance emphasising legitimate-interest documentation and ex post supervision. Incident documentation—near-misses, route deviations, interference attempts—is contemporaneous, factual, and retained for defined periods, with disclosure to public authorities where legally required.

Workforce welfare and safety are integral controls. As an employer in Sweden, Creativa is bound by the Work Environment Act to conduct risk assessments, implement preventive measures, and provide after-incident support; this preventive and systematic duty informs policies for drivers, coordinators, and dispatchers engaged in armoured movements. Executive-level review occurs on a scheduled basis to evaluate route doctrines, partner performance, insurance adequacy, and legal developments (including EU firearms-transfer rules and national changes), with corrective actions tracked to closure.

The accountability framework therefore binds legal compliance (licensing, customs, and export-control where relevant), data-protection governance, and occupational safety into a single, auditable policy for armoured transport and any third-party armed integration.

FINAL WORD

This Policy codifies a civilian, law-compliant, and minimally intrusive approach to weapons and armoured transport. It rejects any internal arming of Creativa personnel; requires disciplined reliance on licensed local partners for lawful armed functions abroad; and treats armoured vehicles as defensive assets governed by ordinary customs, registration, and safety law. The result is a protective posture that is legally sound, operationally credible, and reputationally responsible—one that supports EUOS, ECHO, and wider CCU missions without departing from the legal and ethical architecture upon which Creativa’s institutional legitimacy depends.