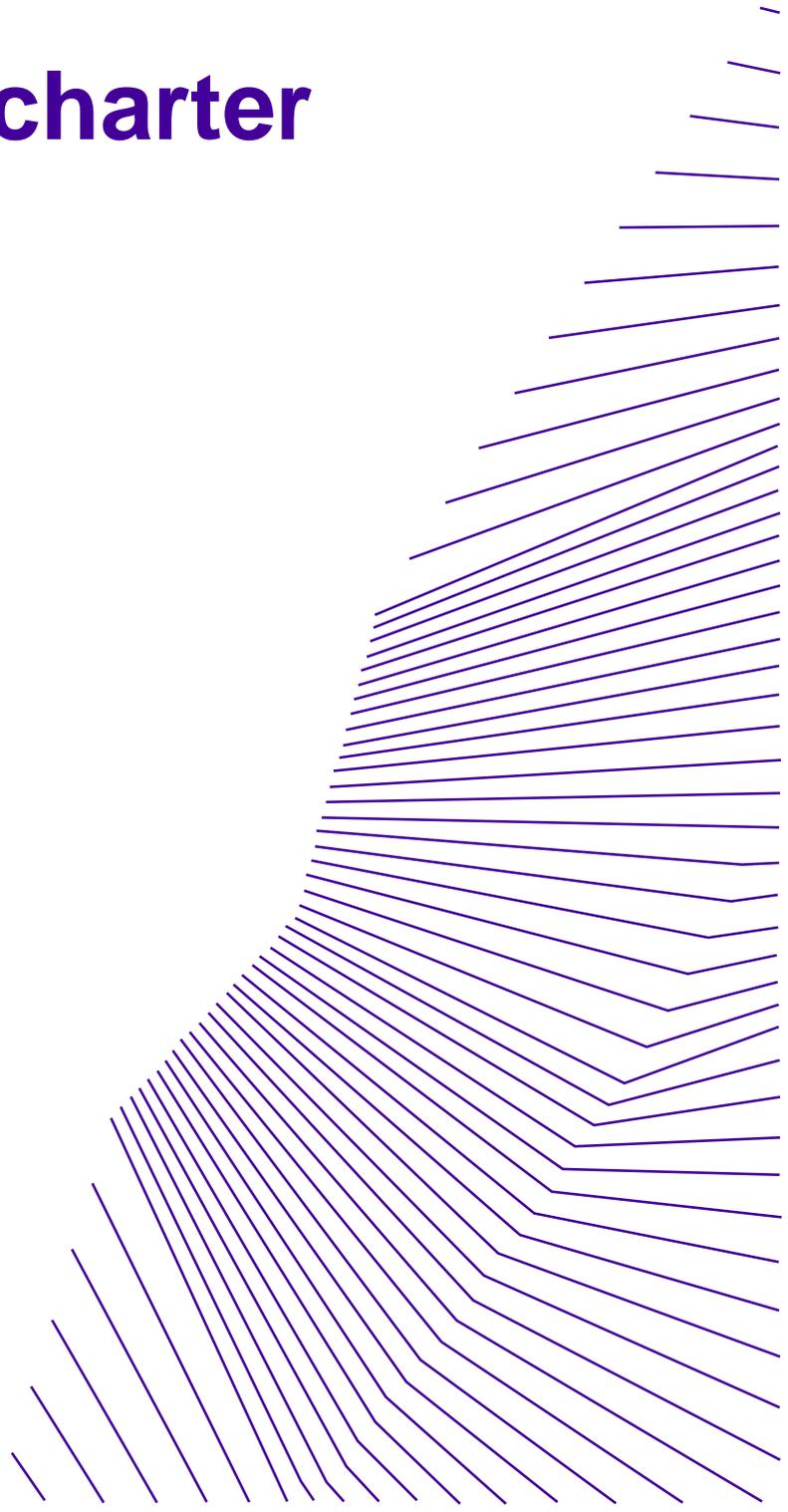


Ethics charter



Ethics charter

The IDEMIA Group is founded on certain key values, among which respecting the principles of ethics is predominant. Professional standards, transparency, and integrity are values shared by all employees. They are the basis of our group's culture, and guide all of our activities.

For most of us, these values are implicit. However, in a developing group which is recruiting several employees every year, it is important to state these values clearly.

I am relying on each and every one of you to take these rules into consideration, and follow them during your daily activities. IDEMIA shall thus continue to enjoy the trust and confidence of its clients, employees, partners, and shareholders.

Compliance with the Ethics charter is indispensable to ensure sustainable development, as well as the harmonious growth of our group.

*Yann Delabrière
Chief Executive Officer*

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OBJECTIVE

- This Charter describes all the principles and values governing all our decisions in the performance of our activities. For the most part, these values are implicit, but we think it is important to state them clearly. They are not intended to replace the laws and regulations in force, but to provide everyone with inputs for assessment and reference point in the performance of their professional activities, as individuals and as part of this group.
- The Ethics charter is based on the texts listed at the end of this document, and texts that contain references to the same.

This document is also available on the IDEMIA website.

GUIDING PRINCIPLES

This Charter is organised into 5 sections containing the guiding principles which serve as guidelines for all IDEMIA employees, irrespective of their role, function, or the entity they are attached to.

1. Our commitments
2. Working together
3. Our relations with our clients
4. Our relations with our suppliers and partners
5. Our relations with our shareholders

1.1 > Compliance with the laws and regulations

The group's employees must comply with the local laws of the countries where they work, even if the legal and cultural environment there is very different from what they were used to before.

All the staff members must ensure that they comply with the applicable laws, particularly in matters of the fight against corruption, competition, inspection of exports and re-exports, labour and employment, health, safety, and the protection of the environment, respecting intellectual property, and data protection.

In case of questions or doubts, staff members should immediately contact their superiors or the legal department.

1.2 > Fight against corruption and influence peddling

IDEMIA has implemented a Compliance program intended to inform and detect any acts of corruption or influence peddling, in France or abroad. This global program is based on an organisation which is supported by a wide network of correspondents and a dedicated procedure.

The term corruption means the act of promising, proposing, or offering, directly or indirectly, any unwarranted advantage, monetary or otherwise, to a third party so that the latter, acts or refrains from taking action for obtaining or retaining a contract, or any other unwarranted advantage in conducting a piece of business.

The group, its directors, and its employees should not tolerate any practice contrary to the international agreement on influence peddling and corruption, active or passive, direct or indirect, for the benefit of players in the public and private sectors, as well as contrary to the laws in force in the country of business. Integrity and prevention of risk of corruption are not negotiable, even if this results in giving up contracts and the interests of the corresponding turnover.

In no case shall the group and its employees contact a third party to accomplish an action which they themselves are prohibited from performing according to the rules of ethics or the law. Engaging the services of a commercial partner for influencing or corrupting a physical person or legal entity is a crime according to the laws related to the fight against corruption. Prior to any contractual relation with a commercial partner, a methodical and documented selection process must be completed, and the remuneration of the said partner must be reasonable in view of the situation and expected services.

GIFTS AND INVITATIONS

Commercial gratuities, like gifts and invitations, granted to clients or received from suppliers or other partners are intended solely with the purpose of consolidating the brand image and to

maintain good business relations. Their value must remain symbolic and they must not influence, or give the impression of influencing a business decision.

Moreover, these gratuities are prohibited by the law in certain countries or in certain conditions.

In case of questions or doubts regarding the application of the Compliance procedures, the employee must immediately contact his or her superiors, Information and Liberties correspondent (Carole Pellegrino), or the legal department.

1.3 > Inspection of exports and imports

We strictly comply with, in any countries where we conduct business, the applicable legislation and in particular the regulations in terms of inspection of exports and re-exports of products to third party countries, depending on the classification of the products, the end use, the end users, and client countries.

We are aware that the implementation of these regulations requires particular vigilance.

Similarly, we are aware that failure to comply with the regulations may have unacceptable consequences for the group, its clients, and even individually for the person at the source of this fault.

Everyone, at their own level, must ensure the correct implementation of the organisation and the strict application of the procedures that allow ensuring strict compliance with the restrictions applicable for exports and re-exports imposed by the country of origin of the goods and technologies, and the protection of national products and expertise.

We do not accept any imports or exports towards or from a country on which sanctions have been imposed (i.e. economic or commercial sanctions adopted, administered, or imposed by the United Nations Security Council, the authorities of the United States or the European Union).

1.4 > Respect for individuals

We believe in the fundamental dignity of each human being and in respecting individual and collective rights.

We undertake to respect Human rights, such as defined in the United Nations Universal Declaration of Human Rights and in its subsequent amendments.

We condemn forced labour and child labour and expect our suppliers to also comply with this requirement.

We respect the freedom of association of our employees.

We provide remuneration to our employees such that they are able to fulfil their essential needs, and provide them with the opportunity to develop their skills and capabilities.

We do not engage in any form of discrimination, at any level in our organisation, whether it is based on race, gender, age, religious, political, or philosophical beliefs, union membership, or any other legally protected characteristics.

We treat every individual in a fair manner, and recruit, select, train, encourage, and pay our employees based on the concepts of merit, experience, and other work-related criteria.

We offer a healthy and safe work environment. We also create work environments in which it is possible to have free exchanges while respecting the opinions of all employees, in the same way as we reward creativity and innovation.

1.5 > Workplace safety

We undertake to comply with all the applicable laws and regulations in terms of the environment, safety and health, in the country where we conduct business, and to create and foster safe and healthy workplace environments to prevent workplace accidents.

We undertake to ensure the protection of our employees on all our sites, and to this end, we have implemented policies and procedures which address questions such as equal opportunities, violence at the workplace and harassment, as well as standard rules of conduct.

We prohibit sexual harassment or any other form of harassment of our employees at the workplace or during the performance of the group's activities, at all places where we are present.

We expect our employees to avoid exposing themselves to risks, to follow the risk prevention measures implemented in the group, and do avoid being under the influence of alcohol or controlled substances.

1.6 > Protection of the environment

We respect the letter and the spirit of all the applicable laws and regulations as regards the environment and we have proven ourselves to be respectful of the environment in all countries where we are present.

We declare that environmental considerations are an integral part of our operational practices.

We recommend a prudent approach towards environmental challenges, and take initiatives aimed at promoting environmental responsibility on a larger scale.

We fully support the development and distribution of environmentally friendly technologies.

2 / WORKING TOGETHER

We undertake to work as one single team, and each of us is responsible towards the other members of the team as regards the contributions we make.

2.1 > Prohibiting child labour

We ensure that our entities and suppliers strictly prohibit child labour, regardless of the place where they are established.

We undertake to not employ any children as part of our activities, directly or indirectly. We do not employ any person who is not of the legal minimum age set out by the local law.

We carry out strict and regular employment eligibility verifications prior to recruiting employees, in accordance with the global and local legal recommendations.

2.2 > Providing a fulfilling workplace environment

We strive to provide a workplace environment which will attract and retain talented people and help them fully realise their potential; we do everything in our power to offer opportunities for training, learning, and promotion which facilitate the professional development and progress of every person. Each one of us is obligated to create an atmosphere of confidence and respect, and to promote a productive working environment.

We strive to maintain a working environment based on the dignity, safety, and security of all our employees, which is favourable for good results and free of any form of violence and harassment at the workplace.

In no case shall the working time exceed the authorised legal duration.

We undertake to strictly comply with the laws and regulations related to union activity, and encourage individual freedom and direct dialogue between the employees and the management.

2.3 > Respectful relations

We have established relations based on mutual trust. All employees, partners, and stakeholders must be respected for their capabilities and individual contributions.

We encourage and support the spirit of innovation in all domains of our activities.

We respect the private life and dignity of our employees and maintain the confidentiality of our employees' files. We protect employees' private information and use it only for legitimate professional purposes, in accordance with all the applicable laws.

2.4 > Preventing conflicts of interest

Our personal interests must not interfere in the handling of the operations which we perform on behalf of IDEMIA, nor must they create a conflict of interest.

Employees must refrain from engaging in external activities or accepting supplementary employment, which are likely, in one way or another, to enter into conflict with the correct execution of their obligations, unless specific written authorisation is provided by their hierarchical superior and the local HR advisor.

2.5 > Protecting information belonging to the group and the group's intellectual property

Every person must ensure the confidentiality of the information belonging to the group entrusted to them by IDEMIA or its clients, suppliers, or partners.

Every person must protect the information belonging to the group which is not part of the public domain by implementing the policies, procedures, and contractual agreements entered into by the group in terms of identification, use, conservation, protection, and disclosure of this information.

We strive to protect IDEMIA's reputation and to protect its assets, including the information related to the group, during the performance of its activity.

We are responsible for monitoring the technology owned by the group used for sending emails, using the Internet, and other means of communication, and to investigate any inappropriate use of these means in compliance with the applicable local laws.

Even though we respect the rights of our employees to engage in personal activities on the Internet, the employees shall remain liable for any damage or prejudice caused to our group or our reputation resulting from these Internet activities, be it within or outside the working hours. We therefore invite you to practice discretion and good sense when it comes to the possible consequences of your actions.

2.6 > Protection of data and private life

In the capacity of a major player in the management of civil and digital identity, online security and data confidentiality, the protection of personal data is at the heart of our activity. Consequently, security, confidentiality, and protection of personal data which may be sensitive in nature, are a constant source of concern for IDEMIA; it is also a gauge of confidence as regards our clients, suppliers, partners, employees, and all the stakeholders.

IDEMIA ensures the protection and security of personal data and to respect the private life of the persons concerned, in compliance with the applicable legislation. The personal data which we have obtained and processed within the context of our activities must be used for a precise

and legitimate purpose, in a spirit of loyalty, and cannot be stored beyond the duration necessary for the purpose.

IDEMIA has appointed a correspondent for the protection of personal data (CIL) and a Data Protection Officer with the CNIL (National Commission on Informatics and Liberty), tasked with ensuring the compliance and security of the personal data processing operations.

3 / Our relations with our clients

IDEMIA undertakes to conduct its business honestly, fairly, and in keeping with high ethical standards, regardless of the place.

3.1 > Quality of products and services

We undertake to meet or exceed our clients' expectations in terms of quality, responsiveness, and professional excellence, while complying with the agreed prices and deadlines.

We undertake to meet or exceed our clients' requirements and the applicable regulatory requirements as regards research, development, manufacturing, packaging, testing, supplying, and marketing of our products and services. The notion of quality invariably involves meeting requirements and expectations as soon as possible.

We need to retain the loyalty of our clients by developing and supplying products, solutions, and services which provide value in terms of quality, security, and impact on the environment. Moreover, we undertake to respect the principles of "Privacy by Design" for all our solutions.

3.2 > Transparency

We ensure that the information provided to our clients related to our products, solutions, and services, and particularly information regarding availability and delivery, is useful, accurate, and presented honestly and fairly, using the appropriate channels.

In case our clients are not satisfied with our products, solutions, or services, we undertake to assist them with the steps they should take to submit their complaint and we shall handle all requests quickly, fairly, openly and effectively.

3.3 > Fair competition

In our markets, we compete on the basis of our products, solutions, and services and do not enter into any agreements with our competitors to illegally limit business and competition.

We do not make any unfair, mi, or inaccurate comparisons with the products, solutions, and services of our competitors nor any public comments regarding the personality, financial position, or possible legal or regulatory problems of our competitors.

4 / Our relations with our suppliers and partners

We negotiate with our suppliers, vendors, contractors, commercial partners and other entities with which we conduct business (collectively referred to as “partners”).

4.1 > Service providers

In the capacity of a global group, IDEMIA recognises that it is its duty to act in a responsible manner, respecting the environment and communities with which it interacts.

IDEMIA undertakes to ensure safe working conditions throughout its supply chain, and respect and treat its employees with dignity, and guarantees that it conducts its supply and manufacturing processes in an ecologically responsible and ethical manner. To adopt truly sustainable practices, IDEMIA considers it vital to collaborate with partners who meet the same requirements in terms of ethical standards. IDEMIA strives to collaborate with contractors who accept compliance with the requirements of this Ethics charter which also involves respecting the principles stipulated in the Conventions of the International Labour Organisation, the Universal Declaration of Human Rights, the OECD guidelines and the Global Compact principles.

This Ethics charter is applicable to all the purchase activities and the acceptance of the principles defined therein influences the procedure for selection of contractors. IDEMIA shall require its contractors to comply with this Ethics charter. In case its business partners have their own rules of ethics, these must not be contradictory with this Charter.

IDEMIA expects all its contractors, and via their sphere of influence, the suppliers and sub-contractors of these contractors, to ensure complete compliance with the laws, rules, and regulations of the countries where they conduct business, and in particular, expects strict compliance with the regional, national, and international rules regarding the ethical and responsible conduct to be adopted. All the necessary measures must be taken to ensure that the ten principles of the United Nations Global Compact are followed.

4.2 > Choices of suppliers and conflict minerals

We choose the products and services which best contribute to the long term well-being of our group. We choose our suppliers based on the price, quality, delivery conditions, services and variety offered, and also based on their reputation and ethical, environmental, and commercial practices.

We act in a responsible manner as regards our purchases and ensure the transparency of the rules and practices governing the awarding of contracts and making payments.

We undertake to collaborate with our suppliers to create healthy working conditions and environment for all their employees.

The raw materials that we purchase must be manufactured in a fair and reliable manner, in order to ensure compliance with all the applicable local and national regulations, and the principles of the United Nations Global Compact.

We attach particular importance to the traceability of our supply chains, particularly by applying the principles of the law regarding Conflict Minerals, such as stated in the OECD Guide.

Our Conflict Minerals Policy can be consulted on our website, and we ensure that the metals in our products are not associated, directly or indirectly, with funding armed conflicts.

We undertake to work with suppliers who support and respect the protection of Human rights, and exclude suppliers who do not respect the law in matters of child labour.

We undertake to work with suppliers who take the initiative to promote environmental responsibility on a wider scale.

We treat our suppliers and sub-contractors with fairness and integrity. We respect the conditions stated in the agreements that we enter into with our suppliers, and honour our commitments.

We develop sustainable relations with our network of “eco-friendly” suppliers of raw materials and FSC/PEFC certified packaging.

4.3 > Protection of intellectual property

We undertake to work with suppliers who respect and protect the intellectual property rights of IDEMIA and of any third party, (particularly, but not limited to, the software, patents, inventions, brands, and drawings) in particular by prohibiting copying, using, or disclosing the said intellectual property rights without prior authorisation.

5 / Our relations with our shareholders

We have adopted a respectful approach towards our shareholders, and particularly keep them informed regularly. We strive to create balanced and sustainable relations with them, by creating a serious and loyal working environment, and by practicing transparency.

5.1 > Conflicts of interest

We are responsible towards our shareholders when it comes to making decisions based solely on the larger interest of the group, not taking any personal concerns into account. We must avoid situations in which our loyalty is, or might appear to be, undermined.

To avoid any conflict of interest with our shareholders, we have implemented an ad hoc governance, in compliance with the local laws and regulations.

5.2 > Using the group's property

Our shareholders have the right to expect that the group's property is correctly maintained and used in an economical and effective manner. Generally, we must not use the group's equipment or resources in an abusive manner for personal use.

5.3 > Accuracy of the books / registers

We take our decisions based on the information recorded at all levels of the group. Any inaccurate or incomplete information may result in incorrect decisions, and have negative repercussions.

We must record all information with honesty and accuracy. All the financial transactions and all the payments must be authorised and recorded, in accordance with the applicable laws and regulations as well as the current practices in the sector. We prepare and disclose our consolidated financial statements in compliance with the accounting standard (for example, IFRS).

We are obligated to ensure that we provide our investors with information that reflects the true value of our operations. We must openly communicate regarding our operations, without compromising the confidentiality of the information belonging to the group.

We honestly disclose all financial information and the results of completed operations concerning our activity, our group, our financial position and our performance, in compliance with the agreed deadlines.

Applicability

This Charter provides everyone within IDEMIA with a framework which helps take the correct decisions. The principles listed in this Charter have a clear set of standards, which are based on our values, and which serve as the basis for our conduct in all the domains of our professional activity.

We expect each IDEMIA employee to act in compliance with the principles stated in this Charter.

Implementation

How to implement the Charter in practice? How can each one of us be certain that we are fulfilling our commitments as regards this Charter?

If you have doubts about the behaviour to be adopted or if you are facing certain difficulties, asking yourself the following questions may help act in an acceptable manner:

- Am I defending IDEMIA's values?
- Are my actions legal and compliant with the standards of our profession?
- Can my actions harm IDEMIA's reputation?
- Am I compromising my own integrity or that of IDEMIA or our clients?
- Am I treating others how I would like others to treat me?
- Is my choice of actions the best from an ethical point of view from among the various options? Do I agree with my choice?
- If I had to justify my decision, would the examiner agree with the action I chose?
- Have I consulted by colleagues sufficiently?

Who do i contact if i have questions?

We encourage employees to ask for advice regarding the application or interpretation of this Charter and expect them to fully cooperate with any investigation concerning a possible violation. If you do not understand the principles stated in this Charter, or if do not know how to apply them, please do not hesitate to consult your manager, your local HR manager, or the Legal Department.

A list of references is given on the following page.

And in case of an infringement ?

Discrepancies or infringements related to the Ethics charter are unacceptable.

IDEMIA has implemented an alert collection system with the Internal Audit Management which allows receiving reports from employees regarding behaviour or situations contrary to this Charter.

This alert system must be given priority over any other form of internal or external communication.

We acknowledge that any violation of the Ethics charter, subject to the applicable local laws and regulations, may result in disciplinary sanctions, which may include dismissal. The degree of the applied sanction shall partly depend on the level of cooperation of the transgressor.

References

Here is the list of the main texts on which this Charter is based:

- La Convention de l'OCDE sur la lutte contre la corruption d'agents publics étrangers dans les transactions commerciales internationales (1997),
- les Conventions Européennes de lutte contre la corruption : The European Community Convention against corruption involving officials of the European Communities or officials of Member States of the European Union (1997), The European Criminal Law Convention on Corruption against active and passive corruption of Foreign officials (1999), The European Civil Law Convention on Corruption (1999),
- The United Nations Convention against organised transnational crime (Italy, 2000),
- The United Nations Convention against corruption, called "Merida" or "CNUCC/UNCAC" (2003).

Universal Declaration of the Human rights

<http://www.un.org/fr/documents/udhr/>

Global Labour Organisation – Codes of Practice

<http://www.ilo.org/safework/info/standards-and-instruments/codes/lang--en/index.htm>

United Nations Global Compact

<http://www.unglobalcompact.org/Languages/french/index.html>

Overview of U.S. Export Control System

<https://www.state.gov/strategictrade/overview/index.htm#>

French Information System Security Agency – ANSSI France

<http://www.ssi.gouv.fr/>

Directorate-General for Enterprise – Services for dual-use goods (SBDU) – France

<http://www.entreprises.gouv.fr/biens-double-usage/accueil>

Guiding Principles of the OECD for multinational companies

<http://www.oecd.org/fr/investissement/mne/>

American Law: "Foreign Corrupt Practices Act" or "FCPA", 1977, amended in 1998:
"International Anti-bribery and Fair Competition Act"

<http://www.justice.gov/criminal/fraud/fcpa/docs/fcpa-english.pdf>

British law: "The UK Bribery Act" (2010)

http://www.legislation.gov.uk/ukpga/2010/23/pdfs/ukpga_20100023_en.pdf

French law no. 2016-1691 dated 9 December 2016 pertaining to transparency, the fight against corruption and modernisation of economic life - Sapin 2 Law

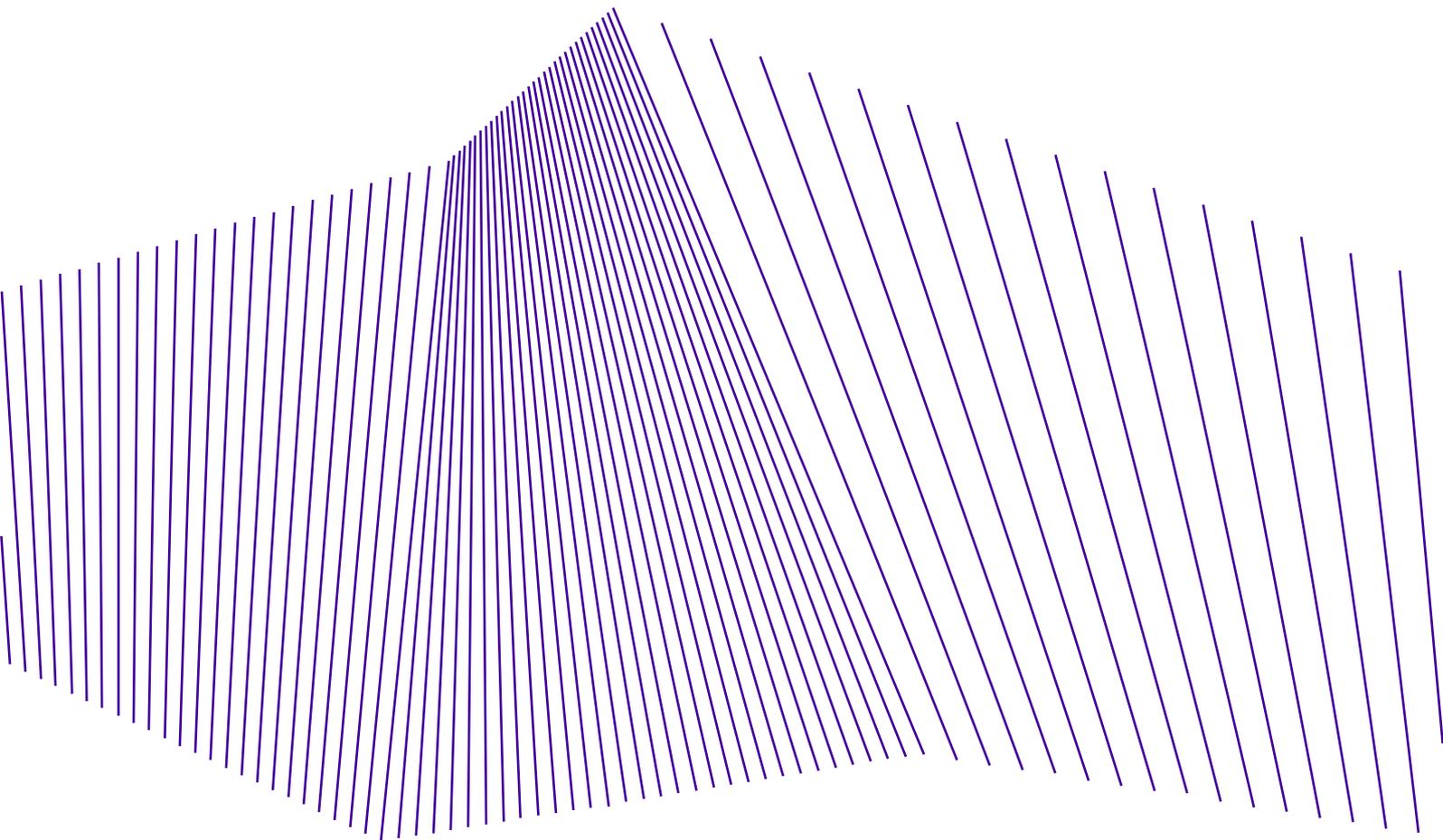
http://www.cjoint.com/doc/16_12/FLknuHuFltM_loisapin2.pdf

Data protection

<http://www.coe.int/fr/web/conventions/full-list/-/conventions/treaty/108>

Conflict minerals (OECD Guide concerning duty of diligence for supply chains responsible for minerals originating from conflict zones or high risk zones)

<https://www.oecd.org/corporate/mne/GuidanceEdition2.pdf>



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