



IDEMIA

SUPPLIER CODE OF CONDUCT V2.0



About IDEMIA

As leader in identity technologies, IDEMIA is on a mission to unlock the world and make it safer. Backed by cutting-edge R&D, IDEMIA provides unique technologies, underpinned by long-standing expertise in biometrics, cryptography, data analytics, systems and smart devices.

IDEMIA offers its public and private customers payment, connectivity, access control, travel, identity and public security solutions. Every day, around the world, IDEMIA secures billions of interactions in the physical and digital worlds.

With nearly 15,000 employees, IDEMIA is trusted by over 600 governmental organizations and more than 2,300 enterprises spread over 180 countries, with an impactful, ethical and socially responsible approach.

| For more information, visit www.idemia.com / Follow @IdemiaGroup on Twitter

Table des matières

| | |
|--|----------|
| 1. Introduction to the Supplier Code of Conduct | 5 |
| 2. Compliance with the Supplier Code of Conduct | 5 |
| 3. Business Ethics | 5 |
| 3.1 Compliance with laws | 5 |
| 3.2 Anti-corruption and Bribery | 5 |
| 3.3 Gifts & Hospitality | 6 |
| 3.4 Competition and antitrust | 6 |
| 3.5 Fraud and deception | 6 |
| 3.6 Export Control | 6 |
| 3.7 Mineral Sourcing | 6 |
| 3.8 Business Information | 6 |
| 3.9 Conflicts of interest | 6 |
| 4. Working conditions and employment practices | 7 |
| 4.1 Human rights | 7 |
| 4.2 Minimum working age and child labor | 7 |
| 4.3 Human trafficking, including forced labour | 7 |
| 4.4 Harassment and healthy working environment | 7 |
| 4.5 Diversity and inclusion | 7 |
| 4.6 Wage and benefit | 8 |
| 4.7 Working hours | 8 |
| 4.8 Social dialogue and freedom of association | 8 |
| 5. Environment, Health & Safety | 8 |
| 5.1 Environmental, health and safety management system | 8 |
| 5.2 Hazardous substance and chemical management | 8 |
| 5.3 Sustainable product and process development | 9 |

| | | |
|-----------|--|-----------|
| 5.4 | GreenHouse Gaz (GHG) emissions reduction | 9 |
| 5.5 | Compliance with environmental legislation..... | 9 |
| 6. | Information protection | 9 |
| 6.1 | Confidential and proprietary information..... | 9 |
| 6.2 | Personal data..... | 9 |
| 6.3 | Intellectual property | 9 |
| 7. | Reporting & Audit | 10 |
| 7.1 | Ethics and compliance alerts | 10 |
| 7.2 | Compliance inspection and audit..... | 10 |
| 7.3 | Retention of Records | 10 |
| 8. | Supplier Commitment | 11 |

Breach of the IDEMIA Supplier Code of Conduct

In the event that the requirements of the IDEMIA’s Supplier Code of Conduct are breached, IDEMIA may decide to review the business relationship with the concerned Supplier and pursue corrective actions and either suspend or terminate immediately the business relationship without prejudice to any other remedies that IDEMIA would be entitled to pursuant to legal or contractual provisions.

1. Introduction to the Supplier Code of Conduct

Moral and ethics are core to our business strategy and at the heart of the values of IDEMIA and we continually strive to deliver high performance for our clients. Therefore, IDEMIA is committed to upholding the highest ethical and professional standards consistent with our core values and our Ethics Charter.

The IDEMIA's Supplier Code of Conduct aligns with our core values and applies to all Suppliers that produce goods for or provide services to IDEMIA or any of its subsidiaries, divisions, affiliates, or clients.

While IDEMIA recognizes that there are different legal and cultural environments in which Suppliers operate throughout the world, this Supplier Code of Conduct sets forth the minimum requirements that Suppliers must meet in order to do business with IDEMIA. Suppliers are also expected to cascade these principles through their own supply chain and go beyond legal compliance in order to advance in social and environmental responsibility and business ethics.

2. Compliance with the Supplier Code of Conduct

IDEMIA's suppliers and their employees, agents, and subcontractors (collectively referred to as "Suppliers") must adhere to this Supplier Code of Conduct while conducting business with or on behalf of IDEMIA. Where a Supplier has its own rules of conduct, the Supplier must demonstrate to IDEMIA that its rules are not in conflict with this Code.

Suppliers must promptly inform a dedicated member of the IDEMIA Trade Compliance team when a situation develops that causes the Supplier to operate in violation of this Supplier Code of Conduct (refer to the last section for contact information) or as specified within the contractual agreement with IDEMIA.

Suppliers are expected to self-monitor and demonstrate their compliance with this Supplier Code of Conduct. IDEMIA may require the immediate removal of any Supplier, its representative(s), or personnel who behave in a manner that is unlawful or inconsistent with our Supplier Code of Conduct, or other applicable IDEMIA's policies. Compliance with the IDEMIA Supplier Code of Conduct is required in addition to any other obligations in any agreement a Supplier has with IDEMIA.

3. Business Ethics

3.1 Compliance with laws

All IDEMIA's suppliers must comply with all laws and regulations applicable to their business, including the local laws and regulations of all countries outside their home country in which operations are managed or services are provided. In all cases in which IDEMIA requirements are more stringent than local legal requirements, Suppliers are required to meet the more stringent IDEMIA's requirements.

3.2 Anti-corruption and Bribery

IDEMIA has a zero-tolerance approach to practices, which contravene international trading conventions regarding corruption and bribery.

Suppliers are expected to put in place a compliance program tailored to the risks of their business and to conduct reasonable due diligence to prevent and detect corruption in all business arrangements, including but not limited to purchasing contracts, partnerships, joint ventures, offset agreements, and the use of third parties such as agents or consultants.

Suppliers shall not offer, promise, authorize, give, demand or accept any loan, fee, reward or other advantage to or receive such advantage from any person as an inducement; to do something which is dishonest, illegal, or a breach of trust; to obtain, retain, or direct business; or to secure any other improper advantage.

3.3 Gifts & Hospitality

Suppliers should avoid giving gifts to IDEMIA's employees. Even a well-intentioned gift might constitute a bribe under certain circumstances, or create conflicts of interest.

Suppliers shall not offer anything of value to obtain or retain a benefit or advantage for the giver and shall not offer anything that might appear to influence, compromise judgment, or obligate the IDEMIA's employee.

Any gifts, meals, or entertainment must comply with applicable laws and regulations, and be consistent with local customs and practices. No cash gifts or cash equivalent should be offered or accepted.

3.4 Competition and antitrust

Suppliers must not enter into formal or informal anti-competitive arrangements that fix prices, collude, rig bids, limit supply or allocate/ control markets.

Suppliers must not exchange current, recent, or future competitively sensitive information pertaining to the Business they do with IDEMIA (including, but not limited to, pricing information) with IDEMIA's competitors. Suppliers must not participate in a cartel or any activity that would unlawfully restrain or impact competition.

Suppliers must not make unfair, misleading or inaccurate comparisons with competitors' products, solutions and services, nor comments on competitors' character, financial condition, or potential legal or regulatory problems.

3.5 Fraud and deception

Suppliers must not seek to gain an advantage of any kind by acting fraudulently, deceiving people, making false claims or allowing anyone else representing them to do so. This includes defrauding or stealing and any kind of misappropriation of property or information.

3.6 Export Control

Suppliers must not import from or export to countries subject to country-wide sanctions (i.e., international economic or trade sanctions adopted, administered or enforced by the United Nations Security Council, Authorities of the United States or the European Union).

Suppliers must ensure that their business practices are in compliance with Export Control laws and regulations including the US, EU and any applicable national regulations, including compliance with Sanctions and Embargoes legislations. Suppliers shall provide truthful and accurate export control classification, information and obtain export control licenses or otherwise authorizations when required and must communicate any declarations where necessary.

3.7 Mineral Sourcing

Suppliers shall establish a policy and a management system and implement due diligence measures with reference to OECD guidelines that will enable IDEMIA to reasonably assure that products and components supplied to IDEMIA containing 3TG are "Conflict-Free".

Suppliers shall support efforts to eradicate the use of any conflict minerals, which directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses.

In the event that the material 'chain of custody' supplied is "indeterminable" or otherwise unknown, the Supplier is expected to either attain the appropriate certifications or phase out that source of mineral.

3.8 Business Information

Suppliers are expected to create accurate accounting records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records should be retained based on the applicable retention requirements.

Falsification of records or misrepresentation of conditions or practices in the supply chain is unacceptable to IDEMIA.

3.9 Conflicts of interest

Suppliers must make IDEMIA aware of any potential conflicts of interest as soon as they are known.

A conflict of interest is a situation where a person is in a position to exploit a professional capacity in any way for his personal benefit or when his/her private interests interfere in any way with those of IDEMIA.

4. Working conditions and employment practices

4.1 Human rights

Suppliers are expected to share IDEMIA's commitment to Human Rights and particularly to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, provide equal opportunity in the workplace as set forth in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Global Compact Principles and the International Labor Office (ILO) Core Labor Standards.

4.2 Minimum working age and child labor

Suppliers must ensure that child labor is not used in the performance of work. The term "child" refers to any person under the minimum legal age for employment where the work is performed, and/or the minimum working age defined by the International Labor Organization (ILO), whichever is higher.

All workers under the age of 18 must be protected from performing work that is likely to be hazardous or that may be harmful to their health, physical, mental, social, spiritual, or moral development.

Suppliers must conduct their labor practices in strict compliance with International Labor Organization (ILO) Conventions No.138 (Minimum Age for Admissions to Employment and Work) and No.182 (Worst Forms of Child Labor).

4.3 Human trafficking, including forced labour

Suppliers must prevent any involvement in all forms of modern slavery, including human trafficking, forced, bonded or indentured labor.

All work should be voluntary on the part of the employee. Suppliers are expected to provide all employees with a written contract in a language they understand clearly indicating their rights and responsibilities with regard to wages, working hours, benefits and other working and employment conditions.

Suppliers should not retain any form of employee identification (passports or work permits), nor destroy or deny access to such documentation, as a condition of employment unless required by applicable law. Suppliers must not charge employees fees, recruitment costs or deposits, directly or indirectly, as a precondition of work. Suppliers must respect the right of workers to terminate their employment after reasonable notice and to receive all owed salary. Suppliers must respect the right of workers to leave the workplace after their shift.

4.4 Harassment and healthy working environment

Suppliers are expected to ensure that their employees are afforded an employment environment that is free from physical, psychological, sexual, and verbal harassment, intimidation or other abusive conduct. Suppliers must provide a safe and healthy working environment for their employees.

4.5 Diversity and inclusion

Suppliers are expected to foster a diverse and inclusive work environment where employees are treated with dignity, respect and fairness, regardless of their race, color, religion, gender, age, ethnic or national origin, disability, sexual orientation or preference, gender identity, marital status, citizenship status, political preference or other personal characteristic.

Suppliers are expected to provide equal employment opportunity to employees and applicants for employment without discrimination and comply with all non-discrimination laws and regulations.

Suppliers must ensure employment, including hiring, payment, benefits, advancement, termination and retirement, based on ability and not any personal characteristics.

Employees or potential employees must not be subjected to medical tests or physical exams that could be used in a discriminatory way.

4.6 Wage and benefit

Compensation paid to workers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Remuneration must meet workers' basic needs.

Suppliers must pay employees in a timely manner and clearly convey the basis on which employees are being paid, as with all other terms and conditions of the employee contract, in a language understood by the employee. In compliance with local laws, workers must be compensated for overtime at pay rates greater than regular hourly rates.

Suppliers must operate a health protection system within the applicable statutory requirements.

4.7 Working hours

Suppliers are expected to operate in consideration of the International Labor Organization (ILO) standards regulating working, resting hours, maximum consecutive days of work and annual leave. Hours worked beyond the normal work week shall be voluntary and suppliers must provide a rest period of at least twenty-four (24) consecutive hours in every seven (7)-day period to all their employees.

Overtime must be voluntary, must not be demanded on a regular basis and must always be compensated at a premium rate.

4.8 Social dialogue and freedom of association

Suppliers are expected to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal.

Suppliers are expected to recognize and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing within the appropriate national legal framework.

Suppliers must not discriminate against employees on the basis of union membership and must provide a working environment in which free discussion respects the opinions of all employees.

5. Environment, Health & Safety

5.1 Environmental, health and safety management system

Suppliers are expected to conduct their business in a manner that actively manages and reduces environmental risks and impacts across their operations, products and supply chain.

Suppliers are expected to establish an appropriate environment management system (e.g., ISO14001 or equivalent), including policies and procedures aimed at effectively managing their environmental performance, including integrating environmental considerations into their product design or service. Suppliers should take reasonable steps to provide a hygienic working environment.

Suppliers are expected to establish an appropriate Health and Safety Management System (e.g., OSHAS 18001 and the ILO Guidelines on Occupational Safety and Health or equivalent), including policies aimed at protecting the health, safety and welfare of employees, contractors, visitors and others who may be affected by their activities by striving to eliminate fatalities, work-related injuries, health impairment and limiting exposure to safety hazards.

Suppliers are encouraged to adopt a zero-tolerance approach to negligent behavior that puts at risk the health and safety of the employee or any other person.

Suppliers are expected to communicate to IDEMIA up to date information in regard to environmental, health and safety (EHS) matters of their products to enable safe usage of the products in the whole life cycle.

5.2 Hazardous substance and chemical management

Suppliers are expected to comply with all relevant laws, regulations and customer requirements prohibiting or restricting the use or handling of specific substances, including labelling for recycling and disposal.

Chemical and other materials posing a hazard if released to the environment must be preferably avoided or minimized. If used they must be identified and managed to ensure their safe handling, movement, storage,

use, recycling or reuse and disposal. Workers must be given training and personal protective equipment for the handling of hazardous substances.

5.3 Sustainable product and process development

IDEMIA's Suppliers shall actively support the sustainability strategy of IDEMIA and make their best effort to develop, manufacture and deliver innovative products and processes that have the lowest possible environmental impact throughout the lifecycle.

Suppliers are expected to improve their efficiency of water and natural resource usage, minimize waste and use of hazardous materials, dispatch goods in an adequate outer packaging and foster reusable / recycled packaging materials such as reduced usage of single used plastic and responsibly manage their air emissions.

5.4 GreenHouse Gaz (GHG) emissions reduction

Suppliers are expected to reduce their climate change impact with a monitored roadmap. Suppliers are expected to improve their efficiency of energy usage, maximize transition to renewable energy sourcing. Suppliers are expected to optimize logistic practices (routes, modes...).

Suppliers are asked to co-operate with IDEMIA by providing upon request, greenhouse gas emissions data and roadmap for emission reduction. The data provided will help to gain a comprehensive understanding of the emissions associated with IDEMIA supply chain and enable IDEMIA to identify opportunities for collaboration and improvement.

5.5 Compliance with environmental legislation

Suppliers shall ensure that all their operations, including their own supply chain, comply with all applicable environmental, health and workplace safety laws and regulations.

Suppliers are asked to co-operate with IDEMIA by providing evidence upon request, at minimum once a year, of compliance with environmental regulations such as, but not limited to, EU Regulation EC/1907/2006 REACH, EU Directive 2011/65/EU RoHS and WEEE Directive 2012/19/EU.

In addition, suppliers are expected to anticipate future regulatory constraints on some chemicals/substances in order to ensure continuity of supply.

6. Information protection

6.1 Confidential and proprietary information

Suppliers are expected to ensure that all sensitive, confidential and proprietary information is appropriately protected. In its relationship with IDEMIA, Suppliers must comply with all applicable data privacy laws and regulations.

Suppliers must protect the sensitive, confidential and proprietary information of others, including personal data/information, from unauthorized access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures, including mitigating emerging risk to information systems by implementing appropriate IT cyber security programs.

Suppliers must report to IDEMIA any suspected or actual data breach or security incident as soon they are aware.

6.2 Personal data

Suppliers and their subcontractors, suppliers or other service providers, shall comply with (i) the European Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR); (ii) the laws and regulations adopted to implement the GDPR and (iii) any other applicable regulation (including laws, rules, governmental requirements, codes as well as international, federal, state, provincial laws).

6.3 Intellectual property

Suppliers must respect and protect the intellectual property rights of IDEMIA and any third parties (including but not limited to software, patents, invention, design, documentation) in particular by forbidding the copy, use

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or disclosure of such intellectual property rights without prior authorization. The transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

Data must not be disclosed, made available or used for any purposes other than those specified by IDEMIA.

7. Reporting & Audit

7.1 Ethics and compliance alerts

IDEMIA is committed to conducting its business activities with the highest ethical standards and has developed a Whistleblowing Policy and reporting procedure to encourage the sharing of actual or potential ethical concerns.

Suppliers are responsible for the prompt reporting of actual or suspected violations of laws, the IDEMIA Supplier Code of Conduct, and/or any contractual relationship with IDEMIA. This includes violations by any employee or agent acting on behalf of either the Supplier or IDEMIA. Concerns may be raised on IDEMIA's whistleblowing platform: <https://idemia.integrityline.org>

IDEMIA assures suppliers that any reported concerns or suspicions about malpractice or unacceptable behavior will be treated seriously, without the risk of unfavorable treatment and unless prohibited by law, confidentially and anonymously.

IDEMIA encourages suppliers to implement their own confidential and anonymous means for employees and other stakeholders to raise grievances or concerns related to the supplier's organization, operations and practices.

7.2 Compliance inspection and audit

We reserve the right to check adherence to these principles and to conduct compliance audits at any time without notice.

Suppliers are expected to supply IDEMIA with all necessary information in order to verify compliance with the requirements of this code. Suppliers shall agree to improve and correct any deficiency identified.

7.3 Retention of Records

Suppliers are expected to create, store and maintain business records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it.

Suppliers are expected to have in place appropriate related controls to ensure the above activities are accurately and securely performed.

All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records should be retained based on the applicable retention requirements.

8. Supplier Commitment

Supplier agrees that it shall comply with the principles of the Supplier Code of Conduct either by applying this IDEMIA Supplier Code of Conduct or by ensuring that the Supplier's own code of conduct and current sustainability practices towards its supply chain are consistent with the principles set out in the IDEMIA Supplier Code of Conduct.

The Supplier shall take the necessary actions to flow down the principles of IDEMIA Supplier Code of Conduct or equivalent to its affiliates, subsidiaries and to their subcontractors involved in business with IDEMIA.

These IDEMIA Supplier Code of Conduct principles shall be incorporated into any routine sustainable business practices.

The IDEMIA Supplier Code of Conduct will be part of the tendering process documentation and its adherence by the Supplier will be one of the mandatory criteria that will be assessed by IDEMIA during the selection process.

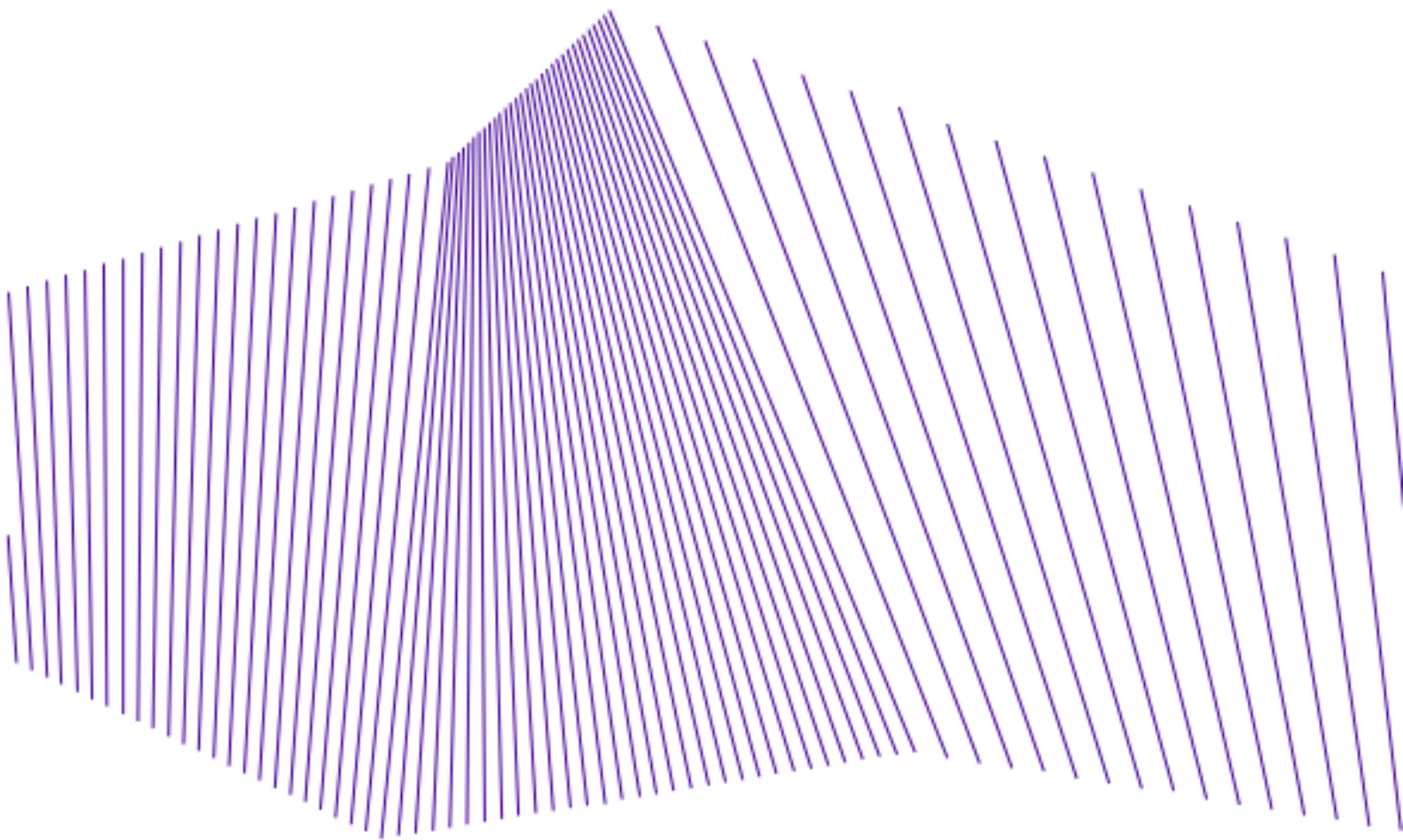
Upon signature of this IDEMIA Supplier Code of Conduct, the Supplier accepts that this document shall be a commitment to the principles set out herein for all agreements (if any), and for all business and contractual relationship with IDEMIA.

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|---|--|-------|--|
| Supplier Company Name | | | |
| Address | | | |
| Contact for Supplier Code of Conduct | | Tel | |
| Name and title of the authorised representative | | Email | |

Effective date:

Signature:

Company stamp:



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