

# Ethics Charter

## Promoting our values

June 2022





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## A MESSAGE FROM THE CHAIRMAN AND CHIEF EXECUTIVE OFFICER

Dear colleagues and partners,

IDEMIA's mission is to make the world a safer place where interactions are 100% seamless, 100% secure and fully accessible to all.

Trust is one of the most valuable things we offer our clients but this trust extends to our employees, suppliers and sub-contractors, shareholders and society as a whole. And this is why IDEMIA Group has stringent standards of ethics, transparency and integrity.

They combine with our values to form the foundation of our corporate culture. They guide our decisions on a daily basis to ensure we act ethically at all times, thereby strengthening the trust our stakeholders have in us. By promoting our values we are protecting our Company.

This Ethics Charter is one of the Group's key documents. It brings us all together in a concerted effort to fulfil IDEMIA's mission: to unlock the world, and make it safer.

As employees of the IDEMIA Group we are, each and every one of us, ambassadors of trust. We must all commit to apply the principles and fulfil the promises set out in this Ethics Charter.

This is how we will continue to inspire trust and ensure IDEMIA's continued success.



*Trust is  
the most  
valuable  
thing we  
offer.*

*Pierre BARRIAL  
Chairman and  
Chief Executive  
Officer*



## LEADING THE WAY IN IDENTITY TECHNOLOGIES

**W**e design forward-looking solutions that unlock billions of seamless and secure transactions in both the physical and digital world.

Since our founding, IDEMIA has been on a mission to **unlock the world** and **make it safer** through our cutting-edge identity technologies.

We are trusted by hundreds of governments and thousands of enterprises in over 180 countries, including some of the biggest and most influential brands in the world, for their mission-critical activities. Our clients use our technologies to **credentialize, authenticate and analyse** identities to facilitate frictionless access control, connectivity, identity, payments, public security and travel at scale and in total security.

### Our values



#### **CURIOUS**

We find inspiration from clients, colleagues, markets and friends.



#### **TRUSTED**

We don't ask for trust, we earn it.



#### **CARING**

We care for our clients, our people and our stakeholders.



#### **DARING**

We challenge the status quo.



#### **TOGETHER**

We can be #1 in all our efforts.



## WHY AN ETHICS CHARTER?

IDEMIA Group's mission is to unlock the world and make it safer so everyone can evolve securely in the physical and digital worlds. To do this, we must set an example in three key areas: trust, transparency and responsibility.

The IDEMIA Group Ethics Charter aims to:

- › set out our values and define our guiding principles;
- › provide background and set benchmarks for our operations;
- › identify our Corporate Social Responsibility (CSR), ethics and compliance markers.

It does not replace national or international laws and regulations. The points touched on in our Ethics Charter are expanded in internal policies and procedures. These are named in this document.

### Who's it for?

The Charter applies to all employees of the IDEMIA Group and its companies worldwide, including temporary staff. All new employees are given a copy.

We also expect our partners, specifically our clients and suppliers, to familiarise themselves with the Charter to make sure they share our values and commitments.

### What happens if it's not adhered to?

IDEMIA Group employees who fail to comply with the rules and guidelines set out in the Charter could face disciplinary action and, in the worst case scenario, be dismissed for serious or gross negligence. In addition to disciplinary action, civil or criminal proceedings could be brought against employees violating those rules and guidelines.



*The Ethics Charter is available in five languages on the IDEMIA Group's intranet and website.*

## Our guiding principles

Act with integrity

Safeguard IDEMIA

Respect other people

Forge relationships of trust

Make a positive contribution

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## ACT WITH INTEGRITY

# COMPLY WITH THE LAWS AND REGULATIONS

IDEMIA has a presence in more than 50 countries and serves clients in over 180. Our 15,000 employees abide by the laws and regulations in force wherever they work.

We make it our priority to comply with all regulations governing quality, employment law, health and safety, anti-corruption, influence peddling and fraud, data protection, transparency, intellectual property, competition and export control.

We also ensure that our trading and commercial partners adhere to these same laws and regulations.

Where local legislation requires stricter standards than those set out in the Charter, they must prevail at all times. If, on the other hand, the rules of the Charter are more stringent, these must prevail unless this would lead to illegal activity.

### Control of exports and dual-use goods

Some of our products are dual-purpose. These are sensitive items intended in most cases for civilian application but could be used for military purposes. In every country where we operate, we adhere strictly to the export and re-export control regulations and the UN Guiding Principles on Business and Human Rights.

### Compliance with international sanctions

We comply with the UN Security Council's economic sanctions worldwide. We also adhere to those imposed by the United States, European Union and other jurisdictions, where applicable.



### Questions or concerns?

Address them directly to our management team or Legal Department.

### Export Compliance Standard

This sets out the requirements and best practices for compliance with the regulations governing export control.

## ACT WITH INTEGRITY

### FIGHT AGAINST CORRUPTION

IDEMIA Group has installed a system to detect and prevent corruption and influence peddling. We have a zero tolerance policy on these matters.

Our employees comply with and apply the anti-corruption laws, specifically Sapin 2, the FCPA and the UKBA. Under no circumstances will they agree to any form of corruption or influence peddling, even if this means the Group has to forego contracts and the corresponding sales revenue.

The purpose of the IDEMIA Group Anti-Corruption Code of Conduct is to set out what constitutes corruption, identify risky situations and state what action to take when faced with such situations. It calls for increased vigilance in our dealings with public officers in France and outside the country (people in positions of public authority, organisations or individuals with a public service mission, elected representatives, legal personnel, state-controlled companies or businesses, etc.).



*We reject  
any form of  
corruption  
or influence  
peddling.*





## ACT WITH INTEGRITY

# FIGHT AGAINST CORRUPTION

### Conflicts of interest

Our personal interests must not interfere with those of the IDEMIA Group. We must declare all relationships which could give rise to a conflict of interest, or give the impression that one exists. Employees must not engage in business activities outside the Group without the express written consent of their line manager and their local HR representative.

### Fight against money laundering

We have specific prevention measures in place, including systematic identity checks on our business partners, to ensure that our operations are not used for money “laundering”.

### Gifts and entertainment

The exchange of gifts and entertainment can help foster good business relations with our clients, suppliers and sub-contractors. However, some of these are not appropriate in a business context and are strictly prohibited (cash gifts, gifts of a questionable or sexual nature, for example). As a general rule, the value of the gift or entertainment must be symbolic and transparency is mandatory. They must not under any circumstances be intended to influence, or give the impression of influencing, a business decision.

Some of our subsidiaries or commercial partners may have stricter gifts and entertainment rules. Where this is the case, we always adhere to the most stringent rule.

### Donations, patronage and political contributions

IDEMIA Group has rules governing patronage, sponsorship and institutional relations to ensure that they do not expose us to corruption. For example, in the United States, we must obtain the NORAM President's approval and sign-off for political contributions of any type.



### The Anti-Corruption Code of Conduct

Aims to help identify and prevent corruption.

### Intermediaries management policy

Governs IDEMIA Group's use of business intermediaries.

### Gifts and Entertainment Policy

Provides guidelines for the exchange of gifts and entertainment and also sponsorship and patronage within the IDEMIA Group.

### Group policy on conflicts of interest

Sets out the appropriate conduct to adopt to prevent conflicts of interest.

## SAFEGUARD IDEMIA

### PROTECT IDEMIA'S RESOURCES

Each day, we must strive to safeguard IDEMIA's reputation and protect its assets, both tangible (premises, IT hardware, etc.) and intangible (information, trademark, intellectual property, etc.).

The value of the IDEMIA Group rests on the value of its assets, whatever their nature. We must commit to maintaining our assets and using the Group's resources efficiently and economically. Generally speaking, this means we must not abuse Company equipment and resources or use them for personal purposes.

#### Protect our information and intellectual property

We must all protect IDEMIA's know-how and intellectual property and keep confidential any information to which we have access while working for the Group. We have in place policies, internal procedures and contractual agreements with our partners and clients in order to protect our information, know-how and intellectual property.

These set out the rules regarding use, retention, protection and disclosure. We will involve management and the support functions (legal services, etc.) to ensure these policies and procedures are adhered to and ask them to put in place the appropriate contractual framework before any action is taken.

#### Keep control of our communications

We must pay particular attention to how we use communication tools, particularly email and the Internet. We must act with discretion and use our common sense when we engage with people outside the Group, especially online or on social media.

Although we respect our employees' rights to engage in personal activities on the Internet, they will be held liable for any harm caused to IDEMIA as a result of these activities, even if this happens outside working hours.

#### Respect the information and intellectual property of third parties

We will respect and protect the information and intellectual property rights of IDEMIA's partners, and more broadly all third parties. Specifically, we will refrain from copying, using or disclosing them without prior authorisation..



#### The Group's Confidentiality Policy

Sets out IDEMIA's policy with respect to the collection and processing of personal data.

#### The IT Charter

Describes the rules governing the use of the IT services.

## SAFEGUARD IDEMIA

# PROTECT PERSONAL DATA

**A**s a market leader in enhanced identity management, online security and data confidentiality, personal data protection is central to everything we do.

The confidentiality and protection of personal data is always uppermost on our mind. It also demonstrates to our clients, suppliers, partners, employees and all our stakeholders that they can place their trust in us.

We must promise to respect personal privacy in accordance with the applicable legislation. The personal data which we collect and process in the course of our activities:

- › must be used for a specific and lawful purpose and not processed in a way that is incompatible with those purposes;
- › must not be retained for longer than is necessary for the fulfilment of those purposes.

IDEMIA Group has appointed a Data Protection Officer (DPO) who will ensure the compliant and secure processing of personal data.



### The Group's Confidentiality Policy

Sets out IDEMIA's policy with respect to the collection and processing of personal data.

### The Sub-contractor GDPR Policy

Sets out the terms and conditions of collection and processing of personal data by our sub-contractors.

### Information Classification Policy

Sets out the rules for protecting and disseminating information according to its sensitivity.

## RESPECT FOR PEOPLE

### RESPECT OUR EMPLOYEES

**A**t IDEMIA, we make every effort to offer a working environment that is convivial, open and welcoming. This is key to attracting talented people and helping them reach their full potential.

All IDEMIA Group employees help to create an environment of trust and respect where everyone is welcome. In this environment, employees must be able to talk openly and freely and respect the opinions of their colleagues.

Our relationships are based on mutual trust. All our employees, partners and stakeholders must be respected for their abilities and individual contributions. We encourage and support an innovation mindset in all areas of our business.

We must endeavour to maintain a working environment that promotes dignity, rejects violence, discrimination and harassment in any form, and is conducive to the achievement of good results.

#### Evolving within the IDEMIA Group

We respect our employees' freedom of association. We encourage direct dialogue between employees and management to create a working environment in which:

- › everyone is free to talk;
- › you can share your opinions;
- › creativity and innovation are welcomed.

We pay our employees fairly so they can meet their essential needs. We give them the opportunity to develop their skills and abilities, offering training, teaching and promotion opportunities to further the professional development of all.



*We create  
a climate  
of trust and  
respect where  
everyone is  
welcome.*



**United Nations Universal  
Declaration of Human Rights**

## RESPECT FOR PEOPLE

### ENCOURAGE INCLUSION, DIVERSITY AND EQUAL OPPORTUNITIES

To reflect the specificity of each of the 180 countries in which we operate, IDEMIA is committed to promoting a spirit of openness, equality and fairness in all its divisions and at all levels within the Company.

For IDEMIA, maintaining its excellent employer reputation is a top priority. Without this reputation, it would not be possible to attract the high level talent we need to make the Company a success. To retain high quality, motivated staff, IDEMIA must be a first-rate employer at all its locations.

We firmly believe that a diverse and inclusive population that provides a platform for different opinions and perspectives fosters a lively, dynamic and creative environment. For example, our HR policies promote equal opportunities in recruitment, internal mobility and working conditions.

IDEMIA Group prohibits and condemns any form of discrimination, direct or indirect, be it based on age, gender, sexual orientation, pregnancy or motherhood, and more generally family situation, gender identity, marital status, political engagement, union involvement, health, social or economic background, physical appearance or any other characteristic protected by law.

We hire, train and pay our employees fairly, based solely on work-related criteria such as experience.



*A gender-balanced workforce, diversity and gender equality are all part and parcel of IDEMIA's culture.*



#### **Diversity and Inclusion Declaration**

Reinforces the Group's ambition to foster cooperation and mutual support and encouragement, in line with its values.

## RESPECT FOR PEOPLE

### CREATE A SAFE WORKING ENVIRONMENT

IDEMIA commits to protecting the health and safety of all our employees and stakeholders with the ultimate aim of achieving our zero accident policy at our sites. We endeavour to create a strong culture of risk prevention.

IDEMIA Group's health and safety requirements apply throughout the business, regardless of the employee's position, company of employment or status (salaried employee, temporary employee, sub-contractor, etc.) They also apply to all our stakeholders, specifically our clients, at all our sites.

The health, protection and well-being of our employees and stakeholders is important to us. This protection guarantees the quality of our products and services and continuity of our production. A safe working environment improves employee well-being and helps us retain talent.

We commit to protecting our employees at all our sites and also while they are travelling for business. So we apply strict rules of conduct in the workplace, primarily to protect them from any form of violence, specifically harassment.

We expect our employees to avoid exposing themselves to risks, to follow the risk prevention measures in place within the Company and lastly, to not be under the influence of alcohol or banned substances.



*Employee health and well-being is very important to us.*



#### **Health and Safety manual**

Defines the health and safety roles and responsibilities of all.



## FORGE RELATIONSHIPS OF TRUST

### WORK WITH TRUSTED PARTNERS

**W**e choose the products and services that are most likely to contribute to the long-term success of our Company. This means that our suppliers' products play a part in the selection process but we also take into account their reputation and ethical, environmental and business practices.

Before entering into a contractual relationship with a business partner, we undertake a methodical, document-based selection process to ensure that they apply the same standards and requirements in terms of quality, integrity and ethics. We ensure that our contract awarding and payment processes are governed by clear rules and procedures.

We select our suppliers based on price, quality, terms of delivery and the services and diversity they offer. We also take into account their reputation and ethical, environmental and business practices.

In concrete terms, this means that we commit to working with suppliers who support and respect human rights. We work with them to create appropriate conditions and a healthy working environment for all our employees.

We prioritise suppliers who share our ambitions to preserve the environment and have developed long-standing relationships with our network of "green" providers of raw materials and PEFC (Programme for the Endorsement of Forest Certification) and FSC™ (Forest Stewardship Council™) certified packaging.

#### **Our commitments to our business partners**

We treat our suppliers and sub-contractors fairly and with integrity. We comply with the terms of their agreements and honour our commitments. We pay a fair market price for the services we expect.

Under no circumstances do we or our employees ask a third party to do something which we or they cannot ethically or legally do themselves. For instance, engaging the services of a business partner to influence or corrupt an individual or legal entity is illegal.



#### **Supplier Code of Conduct**

Sets out what IDEMIA Group expects from its suppliers and sub-contractors.

#### **Intermediaries management procedure**

Governs IDEMIA Group's use of business intermediaries.

## FORGE RELATIONSHIPS OF TRUST

### ADHERE TO COMPETITION RULES

IDEMIA's performance and ambitions rest on the quality of its products and services so the Group must adopt sound and fair competition practices.

We must not enter into an agreement with our competitors which is intended to restrict or distort free competition. Under no circumstances must we discuss our industrial and commercial strategy (pricing, quality, innovation, clients, territories, volumes, etc.) with our competitors.

We must not disloyally, falsely or inaccurately compare our products, solutions and services with those of our competitors or partners or make any public statements about the personality, financial position, or possible legal or regulatory problems, of our competitors and partners.

#### Attending business events

Although justifiable, attending events and meetings organised by professional organisations or industry federations does bring with it certain risks. Never forget that some information cannot be exchanged with IDEMIA's competitors.

Take particular care in this type of situation and refer to the relevant guide to help you make the right decisions.



#### Best Practices for Involvement in Professional Associations

Sets out how to behave appropriately at business events.

## FORGE RELATIONSHIPS OF TRUST

### NURTURE POSITIVE, TRANSPARENT RELATIONSHIPS WITH OUR CLIENTS

**W**e commit to meeting or surpassing our clients' expectations in terms of quality, responsiveness and professional excellence, and promise to adhere to the agreed prices and delivery times.

We commit to meeting or surpassing client and regulatory requirements in areas of research, development, packaging, testing, supply and the marketing of our products and services. Quality means consistently meeting expectations and requirements as quickly as possible.

We must nurture client loyalty by developing and supplying products, solutions and services that offer value in terms of quality, security and environmental impact. We must adhere to the principles of Privacy by Design for all our solutions.

Should a client be unhappy with our products, solutions or services, we promise to inform them how to notify us of a complaint and to process all requests rapidly, openly and efficiently.

#### **Transparency**

We commit to providing our clients with the most useful, accurate and correct information about our products, solutions and services.

We will also take account of all information relating to the Group in an honest and precise manner. All financial transactions must be authorised and recorded. We will prepare our consolidated financial statements in accordance with accounting standards.

We will ensure that the information provided to our investors reflects the true value of our operations. We will communicate openly about our operations, without prejudicing the confidentiality of the information belonging to the Group.



*In a competitive world, our long-term success rests on the trust of our clients.*

## MAKE A POSITIVE CONTRIBUTION

# DEFEND HUMAN RIGHTS

IDEMIA believes in the dignity of every human being and collective rights, in accordance with the Universal Declaration of Human Rights.

Throughout our supply chain, we promise:

- › safe working conditions;
- › to treat people with dignity and respect;
- › eco-responsible and ethical processes.

IDEMIA believes it is vital to do business with partners with the same ethical standards and requirements. We expect them to apply the principles set out in this Charter. This means they must commit to comply fully with the laws, rules and regulations of the countries in which they operate.

We lay particular importance on supply chain traceability, and specifically adhere to the principles of conflict minerals as set out in the OECD guidance.

### Conflict minerals

The raw materials we buy must be produced in a fair and honest manner, in line with applicable legislation and the UN Global Compact. IDEMIA Group commits to providing its clients with all the necessary information to help them keep track of the obligations relating to conflict minerals.

### Combat forced and child labour

We strictly oppose forced and child labour, both within the Group and along the supply chain, and have thus taken action to prevent the risk of our suppliers and sub-contractors violating human rights.

### End use of our products and services

We must take all steps to ensure our products and solutions are not used in breach of human rights. Our project review process includes a risk analysis for this specific purpose. Where required, the matter is passed on to an ad hoc committee at Group level for approval, or otherwise, of IDEMIA's involvement.



### Conflict Minerals Policy

Aims to ensure that the minerals contained in IDEMIA's products have no direct or indirect link with the funding of armed conflict.

### Global Compact

The Global Compact provides a voluntary engagement framework centred around ten principles relating to Human Rights, international labour standards, the environment and combating corruption.

## MAKE A POSITIVE CONTRIBUTION

### PROTECT THE ENVIRONMENT

**A**s an international corporate citizen, IDEMIA Group must act responsibly with respect for the environment and the communities with which it interacts.

We respect the letter and the spirit of the environmental regulations and the environment is an important factor in everything we do on the ground. We commit to working with suppliers who take action to promote greater environmental responsibility.

In applying the ten principles of the United Nations Global Compact, we promise to:

- › take all necessary precautions to protect the environment;
- › take action to encourage greater responsibility towards the environment;
- › foster the development and circulation of environmentally-friendly technologies.

100%

of our production sites have ISO 14001 certification.

#### **HSE (Health, Safety and Environment) Policy**

Sets out the Group's commitments to the environment and health and safety.

## MAKE A POSITIVE CONTRIBUTION

### STEP UP OUR SUPPORT FOR LOCAL POPULATIONS

**T**hrough our assignments and activities, we forge close links with local communities and position ourselves in the heart of society. As a company that likes to make a difference, IDEMIA supports relevant local initiatives.

As part of its Corporate Social Responsibility (CSR) programme, IDEMIA IMPACT, the Company welcomes and encourages local initiatives at its offices and sites with a view to:

- › contributing positively to the development of local communities;
- › helping vulnerable people;
- › working towards the green economy and taking action to protect the environment.

In concrete terms, this means we must prioritise support for organisations with a mission to create opportunities for young people in the areas of education, professional inclusion and digital acculturation. The Group also supports initiatives in favour of the most deprived, those which promote access to health and human rights, including in emergency situations, and those protecting the environment and biodiversity.

To ensure coherence in our commitments, and prevent the risk of corruption, we do not permit:

- › subsidies to individuals;
- › the funding of political parties, candidates or organisations, unless exceptionally approved;
- › the funding of religious organisations;
- › sponsorship of national, regional or local sports teams;
- › the sponsorship of events, with the exception of events organised as part of broader initiatives already supported by the Group;
- › the support of any organisation which does not comply with the Group's commitments in terms of combating discrimination, respecting human rights and the environment and, more generally, ethics and compliance.

All these principles are described in detail in the Group's procedure governing local community initiatives.



*We commit to local social and environmental initiatives.*



#### **Group's procedure governing local community initiatives**

Sets out IDEMIA Group's approach to social and environmental volunteering initiatives and donations.



**PART III**

**It concerns us all**

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## PUTTING THE CHARTER INTO PRACTICE

**T**he Ethics Charter does not cover all the ethical issues we could be faced with while doing our jobs. If you have any questions or concerns, the golden rule is to voice them.

This Ethics Charter provides guidelines to help IDEMIA Group employees make the right decisions. Each of us must act according to the principles set out in the document.

If you are unsure about your actions or decisions, asking the following questions may help:

- Are they illegal?
- Do they promote the IDEMIA Group's values and commitments?
- Could they harm IDEMIA's reputation?
- Do they compromise my own integrity or that of IDEMIA or our clients?
- › How would I react if I had to justify my actions in public?
- › Have I sought sufficient advice from my colleagues and management?

Violation of the Ethics Charter could, without prejudice to the applicable local laws and regulations, lead to disciplinary action and, in the worst case scenario, dismissal.

### The Ethics Committee

The Ethics Committee ensures the Ethics Charter is properly applied and adhered to. Its members are Group employees who have a good knowledge of our business and are sufficiently independent and open-minded to fulfil the mandate.

It meets at least twice a year, and whenever necessary.

#### The Ethics Committee comprises:

- › the Group Legal Director
- › the Group Trade Compliance Director
- › the Human Resources Manager for the Identity and Security Division
- › the Director for Tax Affairs



*When faced with a situation that could undermine our ethical principles, there is not always an easy answer. The best course of action is to voice your concerns and questions. The legal and compliance teams will be there to help you find solutions which are compliant with our commitments and integrity standards.*

**Adrien Cadieux,**

Legal Director Head of Compliance IDEMIA Group



### Who do I ask?

If IDEMIA Group employees have questions concerning the application or interpretation of our Ethics Charter, we encourage them to seek advice.

Questions can be addressed to their management team, local HR manager, the Legal Department or the Ethics Committee.

## USING THE WHISTLEBLOWING SYSTEM

IDEMIA has a system in place for receiving and processing alerts to enable all employees to play their part in upholding Group ethics and preventing risks.

The alert collection and processing system is part of the IDEMIA Group's ethics initiative. It offers employees a way to express their concerns, in addition to the existing whistleblowing channels such as their line manager, the employee representative bodies and any local systems in place. Employees in countries which have their own whistleblowing channel should use it as their first port of call.

The system is open to all IDEMIA Group employees and its business partners, both individuals and corporations. Use of the system is not mandatory.



### Whistleblowing procedure

Describes the alert collection and processing system.

### IDEMIA Integrity Line

IDEMIA Group's online alert notification platform.

<https://idemia.integrityline.org/>

## How do I raise the alarm?



**Send an alert confidentially online** using the platform run by an independent partner, IDEMIA Integrity Line



**Send a letter** marked "confidential":  
**IDEMIA**  
*For the attention of  
Adrien Cadieux,  
Chairman of  
the Ethics Committee*  
2, place Samuel de Champlain  
92400 Courbevoie – France



**Send a confidential email** to the Ethics Committee:  
ethics@idemia.com

### Protecting the whistleblowers

As the aim of the system is to facilitate genuine, honest and responsible communication, IDEMIA Group must, insofar as is possible and in accordance with the local laws and regulations applicable, preserve the confidentiality of the identity of the whistleblower and the information processed. IDEMIA will not tolerate any form of reprisal, or threat of reprisal, towards anyone using the system.

## TAKING IT FURTHER

IDEMIA Group's Ethics Charter is based on a number of documents which Group employees can consult if they wish to further reflect on ethical issues.



### FIGHT AGAINST CORRUPTION AND INFLUENCE PEDDLING

- › The Anti-Corruption Code of Conduct
- › The Gifts and Entertainment procedure
- › Group policy on conflicts of interest

### RELATIONS WITH OUR BUSINESS PARTNERS

- › Supplier Code of Conduct
- › Intermediaries management procedure
- › Best Practices for Involvement in Professional Associations

### CORPORATE SOCIAL RESPONSIBILITY

- › Group's procedure governing local community initiatives
- › Health and Safety manual
- › Diversity and Inclusion Declaration

### CONFIDENTIALITY AND DATA PROTECTION

- › The Confidentiality Policy
- › The GDPR Policy
- › The Sub-contractor GDPR Policy

### WHISTLEBLOWING

- › Whistleblowing procedure



## NON-IDEMIA RESOURCES

### FIGHT AGAINST CORRUPTION AND INFLUENCE PEDDLING

- › OECD Convention on combating bribery of foreign public officials in international business transactions
- › European Anti-Corruption agreements
- › United Nations Convention against Transnational Organized Crime
- › United Nations Convention against Corruption (Merida)
- › Foreign Corrupt Practices Act (FCPA)
- › UK Bribery Act (UKBA)
- › French Law no. 2016-1691 of 9 December 2016 on transparency, combating corruption and the modernisation of the economy, known as “Sapin 2”

### HUMAN RIGHTS AND DUTY OF CARE

- › the Universal Declaration of Human Rights
- › the codes of practice of the International Labour Organization
- › the OECD Due Diligence Guidance for Responsible Supply Chains

### CORPORATE SOCIAL RESPONSIBILITY

- › United Nations Global Compact
- › OECD guidelines for multinational enterprises

### EXPORT CONTROL

- › Insight into the control systems for American exports
- › Directorate General for Enterprise and Industry – Dual-use goods department – France

### CONFIDENTIALITY AND DATA PROTECTION

- › National Cybersecurity Agency of France (ANSSI)
- › European General Data Protection Regulation (GDPR)

# Unlock the world, **make it safer**



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