

VERIDOS

IDENTITY SOLUTIONS
by Giesecke+Devrient
and Bundesdruckerei

Code of Conduct of Veridos GmbH

Date: 01.10.2019

Introduction

As a global corporation, Veridos believes that responsible, lawful behavior is a basic requirement for its business success. It forms the foundation for the trust placed in us by our customers, business partners, and society as a whole.

Our parent companies, Giesecke+Devrient GmbH and Bundesdruckerei GmbH, have also committed themselves to very stringent Codes of Conduct. We are following their example.

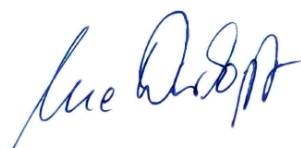
The principles and rules laid down in this Code of Conduct define the action framework for responsible behavior at Veridos. The Code of Conduct is the equivalent of a constitution for every individual within the company. It applies at every location, in every business unit, and in our day-to-day dealings with all business partners and with each other. It encapsulates the corporation's ethos and standards. Each of us is responsible for ensuring that the Code of Conduct is not just a piece of paper but something we live up to and implement throughout our organization on a daily basis. The success and reputation of Veridos are highly dependent on us complying with – and being seen to comply with – these principles and rules. We are aware that managers have a duty to act as role models in this regard.

The Management Board of Veridos GmbH

Date: 01.10.2019



Andreas Räschmeier
CEO



Anne Dierkopf
CFO



Marc-Julian Siewert
COO

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1 Principles

We advocate responsibility in the areas of human rights, labor standards, environmental protection, and the fight against corruption. As a company, we are committed to implementing these principles in practice.

1.1 Human Rights

We respect the personal dignity, privacy, and rights of every individual. We are opposed to discrimination and unequal treatment based on gender, ethnic origin, religion or ideology, disability, sexual orientation, or age.

1.2 Obedience to Laws

We strictly obey the laws of all countries in which we operate.

1.3 Child or Forced Labour / Working Conditions

We reject the use of child or forced labor and will not tolerate any working conditions or treatment of employees that violate international agreements such as the UN's Universal Declaration of Human Rights or the standards of the International Labor Organization (ILO).

1.4 Data and Privacy Protection

As a company specializing in the protection of personal information, treating such data carefully and with respect is one of our core values. We uphold the right of self-determination of each individual concerning their personal information and abide by the relevant data and privacy protection laws, as well as internal data and privacy protection regulations in this area. We actively seek to prevent unauthorized collection, processing, and dissemination of personal information. Data that are no longer required are deleted.

1.5 Responsibility to Society, Environmental Protection, and Product Safety

Our applications, products and services contribute to the social progress and technological advancement of society. We develop environmentally compatible and technically safe products and use technically safe production methods. As a company, we are very much aware of our corporate social responsibility. We therefore seek to reconcile the commercial, social, and environmental impact of our work on a lasting basis. Doing business in a sustainable and responsible way is part of our corporate philosophy and fundamental to our value framework.

1.6 Technology and Innovation

We aim to boost the business activities surrounding our core competencies, while at the same time remaining flexible enough to transfer these skills to new areas. We are committed to the ongoing globalization of the company. This includes consolidating our position in existing markets and tapping into new ones.

2 Commitment to Customers

Our role is to safeguard reliable transactions and the authenticity of identities. We are a trusted partner and preferred provider of products, services, and solutions in all our markets. In addition to our innovative ability and global presence, trust is the basis of our commercial success. We measure our performance in terms of the customer satisfaction of our customers, meeting their requirements with high-quality products, intelligent solutions, responsiveness, and total reliability. Our service commitment and expertise help our customers to achieve sustainable success in their markets.

Every employee endeavors on a daily basis to deliver the highest level of quality and to continually improve the processes and procedures required to perform to such standards. This represents both the basis for the trust placed in us by our customers and a contribution to the future of Veridos.

3 Commitment to Shareholders

The visible orientation of our activities around the principle of sustainability is a pillar of our long-term success and a key competitive advantage. Sustainability helps engender trust among our employees and business partners. Commercial success is a fundamental prerequisite for the company's long-term survival, safeguarding the interests of our shareholders, employees, customers, and suppliers alike. An important measure of our success is an appropriate return on capital employed. To protect both Veridos and our shareholders, we operate a systematic, strategic, and operational risk management system.

4 Commitment Employees

Our employees are the key to our company's success. Their dedication, knowledge, and skills determine the quality of our products and services, and thus our market success.

Our aim is to be a responsible and reliable employer. Encouraging the commitment and satisfaction of our employees is one of our top priorities.

Respect for each and every employee and their individual circumstances is a core aspect of our corporate culture and fundamental to motivation and loyalty. This respect forms the basis for gaining the trust of our employees. We create a work environment that encourages acceptance of personal responsibility and celebrates cultural diversity.

Our HR strategy focuses on three key elements: Systematically increasing the quality of our management culture, advancing employee development, and fostering the diversity of our teams.

4.1 Right to Organize

We respect the right of our employees to exercise their right of codetermination pursuant to national laws and to organize themselves for this purpose.

4.2 Health and Safety

Our responsibility towards our employees starts with a safe work environment. Accordingly, this is a key element of company policy. We have therefore established an occupational health and safety management system that complies with OHSAS 18001 (Occupational Health and Safety Assessment Series).

4.3 Fair and Equal Treatment

We offer all employees equal career opportunities and will not tolerate illegal discrimination or harassment of any kind. Every employee has the right to be treated fairly, politely, and with respect by their superiors, subordinates, and co-workers.

5 Commitment to Suppliers and Business Partners

We treat every business partner with integrity and fairness. Vendors and business partners are selected in a standardized process based on objective, understandable criteria. If a supplier or business partner possesses and implements a similar Code of Conduct, this fact is taken into consideration alongside other criteria during the selection process. We include our suppliers in the ongoing process of enhancing our value creation performance. We seek to build long-term relationships with our suppliers and business partners based on mutual trust.

6 Assets and Information

6.1 Use and Protection of Assets

Individuals at Veridos are personally responsible for the assets entrusted to them. We observe all relevant safety and security regulations and treat items with care. Consumable items must be used sparingly and efficiently.

6.2 Security and Confidential Information

We meet the requirements of our customers with respect to ensuring comprehensive security standards and confidentiality when developing and manufacturing each product and delivering our services. Effective emergency and crisis management is important to us. This requires a collective effort that depends on the security-conscious behavior of each individual. The use of confidential business information about the company, either directly or indirectly, for personal benefit, the benefit of others, or to the detriment of Veridos, is not tolerated.

7 Business Integrity

7.1 Compliance with Laws

Laws make an important contribution to security, stability, and predictability. As such, they are instrumental in allowing us to achieve our corporate objectives. We are especially committed to ensuring compliance with anti-corruption, anti-trust, and subsidy laws, accounting and consolidation standards, and taxation, export, import, and customs regulations. Our employees receive appropriate training. We have a zero-tolerance approach to employees who commit offenses or crimes in the erroneous belief that they are serving the interests of the company. This also expressly applies to instances in which obeying the law may lead to a loss of business or influence. The fact that a contract may be lost to a competitor is no excuse for breaking the law. Risks are to be avoided and timely, expert advice must be obtained before any action is taken that may lead to a violation of applicable law. A global compliance management system has been established for this purpose.

7.2 Fair Competition

We are committed to the principles of the market economy and fair competition. Competitors are treated fairly and in accordance with the applicable legal provisions. We do not knowingly make false or ambiguous statements about our competitors, and neither do we publicly criticize them. We also refrain from commenting on or disseminating negative reports about competitors.

7.3 Separation of Personal and Company Interests

It is our strict policy not to accept gifts or invitations from customers, suppliers, or competitors. Exceptions are permissible in individual cases, provided the gift does not exceed customary limits and the possibility can also be excluded that accepting the gift will influence business decisions or create the impression that such decisions are being influenced. Receiving monetary gifts or benefits in kind is not permitted.

For our part, we will only give such gifts or benefits to business associates, partners, and so on that we are allowed to receive from them in accordance with these principles. We exercise particular restraint in dealings with civil servants, government employees, officials, and/or other persons within or close to governments or their administrations to avoid any impression that we intend to exert improper influence on official decisions by giving or accepting gifts or other benefits. Giving monetary gifts or benefits in kind is not permitted.

Veridos employees may not use their signatures to authorize transactions for their own benefit. We also ensure that there are no conflicts of interest in the procurement process. Purchasing employees must make a special effort to maintain their personal integrity, impartiality, and independence. They must refrain from actions that give even the slightest impression to the contrary.

Our employees may not engage in business dealings with themselves or their family members on behalf of Veridos.

7.4 Relationships with Third Parties

We remain neutral on political issues. We have no affiliation with any political party and do not make donations to political parties or to organizations or foundations that are closely linked to political parties. The membership of organizations or associations by Veridos must be authorized by the Management Board on a case-by-case basis.

Veridos's commitment to social issues includes making donations. Donations may only be made to recognized not-for-profit organizations, must be tax-deductible, and require the approval of at least one member of the Management Board.

In contrast to donations, sponsorship activities involve receiving something in return. Such activities are designed to promote the company's marketing objectives by raising the company's profile or boosting its image. In the case of all sponsorship activities, the sponsorship partner must provide demonstrable communications and marketing services and the activities must be transparent.

8 Compliance and Implementation

All Veridos employees are obliged to adhere to this Code of Conduct while performing their duties. Compliance violations and breaches of the law are not tolerated and will be penalized without delay (zero-tolerance policy). The Compliance Office operates a training program to communicate the content of the Code of Conduct. If an employee is unsure of the meaning of any of the principles, they are required to obtain advice. Audits are held to assess compliance with the Code of Conduct.

9 Worldwide Application

This Code of Conduct applies worldwide to all employees of the Veridos group of companies with immediate effect.

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