SICPA Code of Conduct



Enabling trust

SICPA CODE OF CONDUCT

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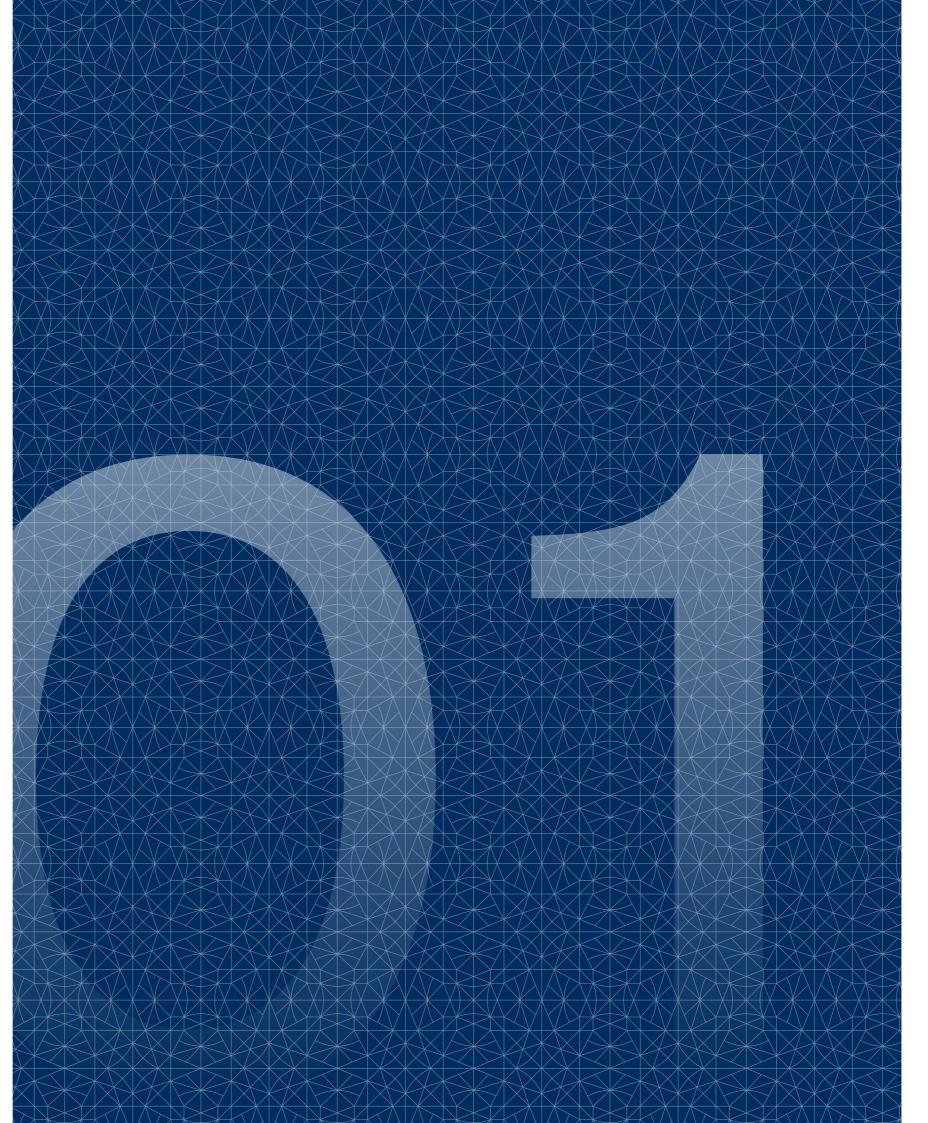
SECTION 01

TRUST IS OUR BUSINESS

IN THIS SECTION

1.1 A CONVERSATION WITH PHILIPPE AMON

1.2 OUR VALUES, OUR MISSION



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A CONVERSATION WITH PHILIPPE AMON

SICPA's purpose is "Enabling Trust". What does this mean?

Trust is the cornerstone of social harmony, economic prosperity, and civic progress. For nearly a century, SICPA has enabled the trust necessary for modern societies to function in the face of economic uncertainty, technological disruption, and new societal challenges.

SICPA enables trust between state institutions and individual citizens by protecting the sovereignty of strategic value chains, guaranteeing the authenticity of data, and securing the integrity of banknotes, transactions, e-services, and official documents. In addition, SICPA enables trust between companies and their customers with solutions for authenticating products and safeguarding legitimate economic actors and individual consumers from counterfeit products.

Compliance with the law and doing business with integrity are not optional; they are crucial as a basis for trust, which is at the heart of what we do.

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How does this Code of Conduct relate to the purpose of Enabling Trust?

This Code outlines the way we want to do business with integrity, how we are committed to our employees and stakeholders, and what we expect from each and every one in SICPA. This is because the trust that our customers and our business partners place in us depends on our integrity. Without integrity, there can be no trust.

Therefore, this Code is intended not only for our SICPA employees but also for all our suppliers, business partners, and customers. As we all work hard at SICPA to deliver our vision of "Enabling Trust" and to sustainably develop our business, we must always ensure that we not only comply with the law, but also do business with integrity.

So should this Code then be seen as a guiding document?

Absolutely. This Code is an overarching document that I like to see as a behavioural compass. Many of the topics it covers are supported by additional policies and procedures. Those are useful resources, especially when confronted with difficult situations or decisions.

Is there any preferred channel for someone to ask questions or raise concerns?

First of all, I encourage everyone to ask questions, to challenge for improvement, or to raise concerns, especially when in doubt. At SICPA, we promote a Speak Up culture by inciting our employees to talk to their managers, to other departments, to the senior leadership team, or to myself. The same goes for our external stakeholders. Ultimately, anyone can use our whistleblowing system, the SICPA Speak Up Line.

Any closing words?

I count on every SICPA employee to make the right decisions at all times and to contribute to safeguarding our reputation and our long-term success. Compliance with the law and doing business with integrity are not optional; they are crucial as a basis for trust, which is at the heart of what we do.

PHILIPPE AMON CHAIRMAN & CEO SICPA 01 TRUST IS OUR BUSINESS

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OUR VALUES, OUR MISSION



In the complex world in which we operate, our values are our people's compass. They are fundamental to who we are and what we stand for, and they help us act in a way that is consistent with our common culture.

We expect all our employees to embrace and behave in line with our five core values:

- Respect
- Commitment
- Solidarity
- Competence
- Trust

Similarly, we expect all our employees to interpret and abide by this Code of Conduct with these values in mind.

OUR VALUES IN PRACTICE



Respect

We listen to and accept each other, mindful of our individuality and differences.



Commitment

We engage, decide and act with conviction, creativity, courage, perseverance and energy for our collective success.



Solidarity

We foster group cohesion, share responsibilities and stay united.



Competence

We use, share and continuously develop our expertise.



Trust

We create an environment and cultivate relationships based on exchange, transparency and integrity to foster individual fulfilment and sustainable group performance.

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YOUR **RESPONSIBILITY**

Delivering on our company's purpose of Enabling Trust is everyone's responsibility. We can only achieve it through collective effort, by complying with all applicable laws and following our internal policies.

IN THIS SECTION

- 2.1 OBEY THE LAW, FOLLOW THE CODE
- 2.2 OUR EXPECTATIONS



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WE EXPECT YOU TO



Read it, check that you understand it and how to apply it.



Ask for guidance when you are not sure which rule should apply.



Speak up if you think others may not be complying.

IF YOU ARE A SICPA MANAGER OR EXECUTIVE, WE ALSO EXPECT YOU TO



Lead by example in your words and actions.



Promote and explain this Code and applicable SICPA policies through discussion and training.



Encourage employees to come to you with any concerns or questions.



Listen to any concerns and questions and take reports of violations seriously.



Support those who come forward, and make sure no one suffers retaliation for speaking up.



Escalate and/or take appropriate action when a concern is brought to your attention.

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SECTION 03

OUR **PEOPLE**

We owe our success to our people, and are committed to the development, safety and well-being of our workforce.

We should all feel proud of our role at SICPA and confident that we can fulfil our potential, free from discrimination and harassment.

We work together in an atmosphere of fairness and mutual respect.

IN THIS SECTION

- 3.1 DIVERSITY AND INCLUSION
- 3.2 HEALTH AND SAFETY
- 3.3 CONFLICT OF INTEREST
- 3.4 SOCIAL MEDIA COMMUNICATION



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DIVERSITY AND INCLUSION

Our commitment to a diverse and inclusive workforce not only strengthens our culture, it empowers us in the global marketplace.

OUR WORKPLACE IS DIVERSE



We want to attract, retain and grow the best talents, from a pool that reflects the diversity of our global presence.

We strongly believe that diverse perspectives fuel innovation and make our workplace more creative and stimulating.

OUR WORKPLACE IS INCLUSIVE



We want all our people to feel that they can and should contribute, whatever their personal background.

Each of us should feel empowered to pursue professional, technical and scientific excellence without fear of any kind of discrimination.

THINK ABOUT ____

 When selecting candidates for a new position or promotion, make sure your decision is based on the individuals' qualifications and objective ability to contribute. **Diversity means** acceptance and respect of individual differences, such as parental status, gender, religion, race, ethnicity, sexual orientation, physical abilities, age, socio-economic status, political beliefs and other ideologies.

Inclusion means being curious about our differences and actively ensuring that everyone feels understood and appreciated for their contribution.

OUR WORKPLACE IS EQUITABLE



We are committed to eliminating bias and discrimination in all our internal processes globally, across every aspect of employment, from recruitment to career progression.

We offer fair and equitable compensation packages reflecting individual performance, and actively monitor our people's pay and benefits to identify and address potential inequalities.

OUR WORKPLACE IS HARASSMENT-FREE



We do not tolerate any kind of harassment, sexual or otherwise.

Mobbing, bullying and inappropriate forms of communication have no place in our work environment.

Our tone and method of communication should always be considerate, respectful and professional, never aggressive nor dismissive. OT TRUST IS

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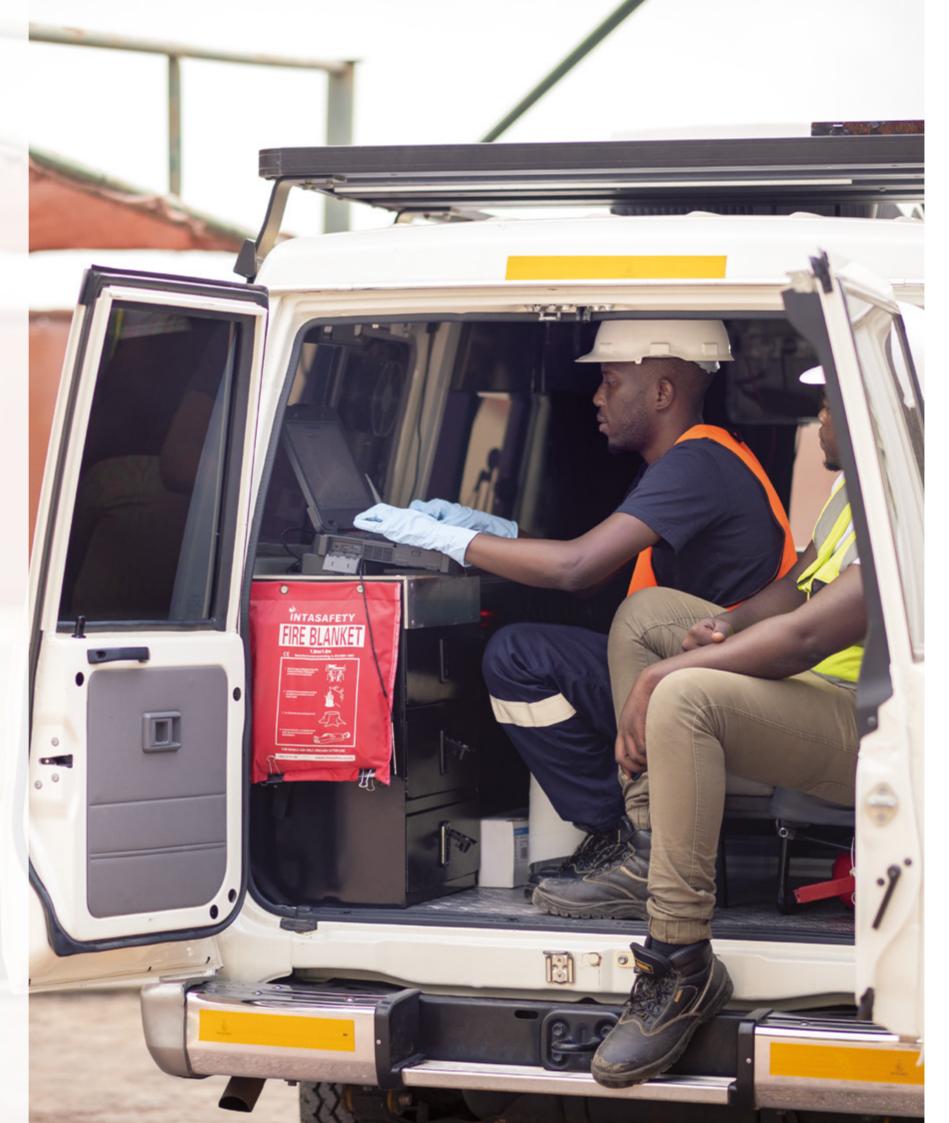
HEALTH AND **SAFETY**

Protecting the health and safety of our people is always our top priority.

- Every day we strive to provide a safe and healthy workplace for our employees and anyone working with us, such as vendors, subcontractors, customers and business partners.
- We keep ourselves aware of all occupational hazards generated by our operations and ensure they are adequately and effectively mitigated.
- We do not compromise on the mental and physical welfare of our people.

THINK ABOUT

- When facing safety risks, protect yourself and others, and raise your concerns.
- Never set business targets that compromise your health or safety measures.



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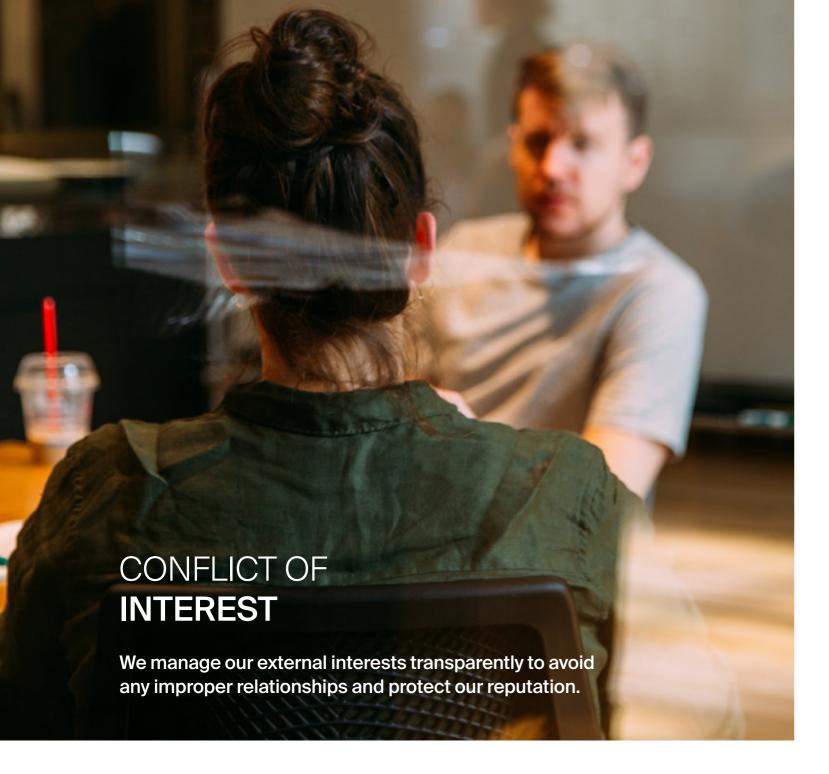
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We respect the privacy of every SICPA colleague and generally do not wish to interfere with their or their family's private interests. However, in certain situations such interests may conflict with the legitimate interests of our business.

We ensure such situations are disclosed and appropriately managed to avoid any impropriety or reputational damage to the parties involved.

THINK ABOUT ___

- Even if laws are not being violated, conflicts of interest could still result in unethical or undesirable behaviour.
- Whether actual or perceived, they require transparency and are best managed by being disclosed, discussed, decided upon and documented.

SOCIAL MEDIA COMMUNICATION

We use social media cautiously and in a way that is aligned with our values.



Compliance

Our presence on social media platforms as SICPA employees or representatives must reflect the company's values and comply with applicable laws.



Confidentiality

We never use social media to conduct business discussions. Even when a channel appears private, we do not share confidential information.



Common sense

We should express our personal opinions with judgement and common sense, respecting our colleagues, customers and partners.

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SECTION 04

OUR BUSINESS INTEGRITY

To be credible as Trust Enablers in more than 180 countries around the globe, we need to comply with the laws in these different marketplaces and act according to our values.

Integrity means doing what is right, not necessarily what is easy or immediately profitable. It can mean walking away from business opportunities that could not be pursued without compromising our values.

IN THIS SECTION

- 4.1 CORRUPTION
- 4.2 GIFTS AND ENTERTAINMENT
- 4.3 INTERACTING WITH GOVERNMENT OFFICIALS
- 4.4 WORKING WITH THIRD PARTIES
- 4.5 COMPETITION LAW
- 4.6 TRADE CONTROLS



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We do not offer, promise, accept or authorise bribes. These and other corrupt transactions are not limited to cash.

The pressure to get involved in corrupt transactions can arise in most of our routine business activities: when we seek to secure a sale, when we negotiate with a vendor, when we apply for a licence or permit.

We also stay vigilant and refrain from acting in ways that could be perceived as corrupt by our partners or external observers.

Note that specific rules apply whenever a government official is involved.

THINK ABOUT

invitation to an event, a charitable donation, a job opportunity – anything that, if offered or promised, could influence the decision of the recipient or the outcome of the business transaction.

- Any request for a bribe or undue advantage that is not properly reported and acted upon can eventually backfire. Even the perception of improper business conduct could adversely affect our reputation and activities.
- At SICPA we never accept the line 'this is how business is done here' as an excuse to enter into corrupt transactions.

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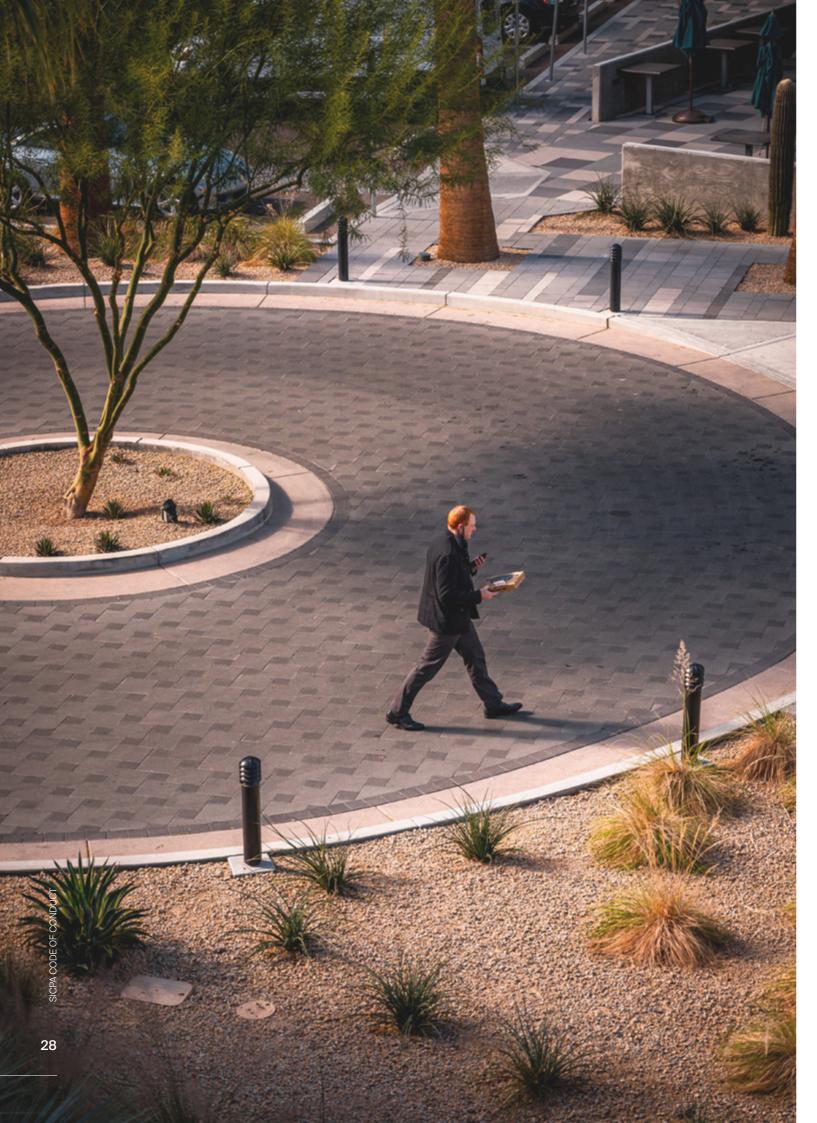
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EXAMPLES

- Only pay commission to an intermediary when you have understood and documented their legitimate added value to the transaction
- Never invite a customer for a leisure weekend on company expenses.
- Avoid giving a job or consultant agreement to a customer's relative.

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GIFTS AND **ENTERTAINMENT**

We keep the exchange of gifts and entertainment within the bounds of reasonable business courtesy.

- We use common sense and refer to policies when deciding whether to offer or accept gifts, meals or hospitality.
- We consider how the exchange of such gifts may be perceived externally, in the context of SICPA's relationship with the other party.
- Our policies define reasonable thresholds and levels of approval for giving to and receiving from non-government officials. Specific rules apply to interactions with a government official.
- The occasional exchange of small gifts and entertainment invitations is part of business relationship-building, but when such gifts are used to unduly influence business decisions, we should not accept them.
- In any context, gifts of cash, or cash equivalents such as vouchers, are strictly prohibited.

THINK ABOUT ___

- Many organisations have rules regarding gifts and entertainment.
 Before offering a gift or invitation, consider your counterpart's company rules.
- Always consider how your giving or acceptance of such gifts would be perceived by your colleagues or customers.

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INTERACTING WITH GOVERNMENT OFFICIALS

We promote transparent and lawful interactions with government officials.

Interactions with government officials are an integral part of SICPA's business. They are generally subject to more restrictive rules and public scrutiny, so we are particularly careful to avoid even the perception of impropriety.

GOVERNMENT OFFICIALS INCLUDE

- Any member, employee or person acting on behalf of government agencies, state-owned enterprises or international organisations
- Elected officials
- Political party leaders

Relatives of government officials are subject to the same restrictions.

- To avoid any improper interaction that might expose government officials or SICPA, we familiarise ourselves with the applicable rules.
- As Trust Enablers for our customers and the public, we must be particularly careful not to breach any public procurement rule by making gifts or offers that could be seen as attempts to influence the decision-making process.
- As a general rule, we do not offer any gifts, contributions, donations or sponsorships to, or pay for the travel and entertainment of, government officials.
 Any exception to this rule, whatever its value, requires prior approval from the Chief Compliance Officer or their designee.

THINK ABOUT _____

- If you are in a personal relationship with a government official, you must disclose this to SICPA as it may be seen as a conflict of interest.
- Employees of private companies may be considered government officials if they act on behalf of, say, a government agency.



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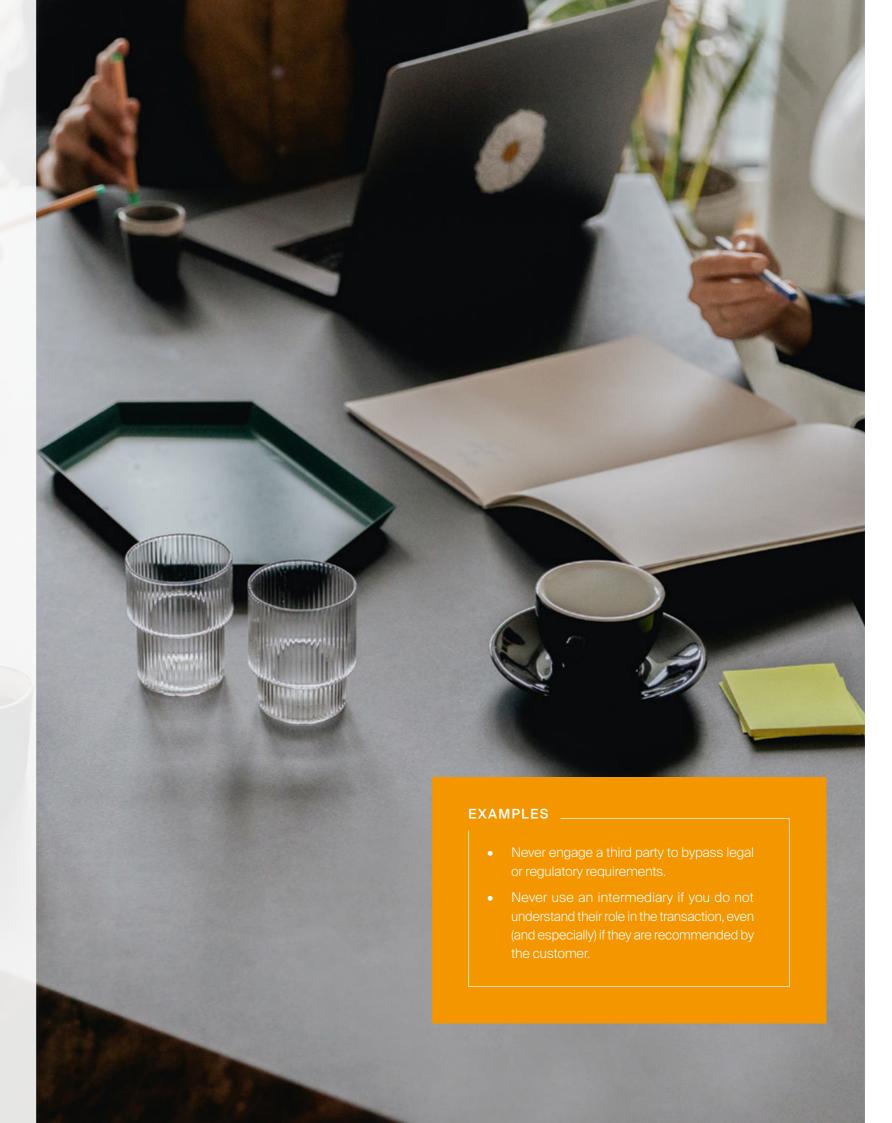
WORKING WITH THIRD PARTIES

We are responsible for what others do on our behalf.

- We make sure we know and understand who we are doing business with, by conducting integrity due diligence and requiring proper documentation for their services.
- Once we have decided to work with a third party, we hold them to our own high standards. Their work affects our reputation and their impact is ultimately our responsibility.
- We never ask third parties vendors, subcontractors, commercial consultants and other business partners – to act in a way that does not comply with this Code or applicable laws and regulations.
- If we ourselves cannot act without compromising our principles, we cannot ask them to do so on our behalf. We are accountable for their actions.

THINK ABOUT ___

- We must always have a solid and well-documented rationale to justify engaging a particular third party.
- Our expectations of compliance with this Code also apply to our business partners and it is up to us to inform them. Engaging a third party with a questionable reputation or poor integrity will expose SICPA.



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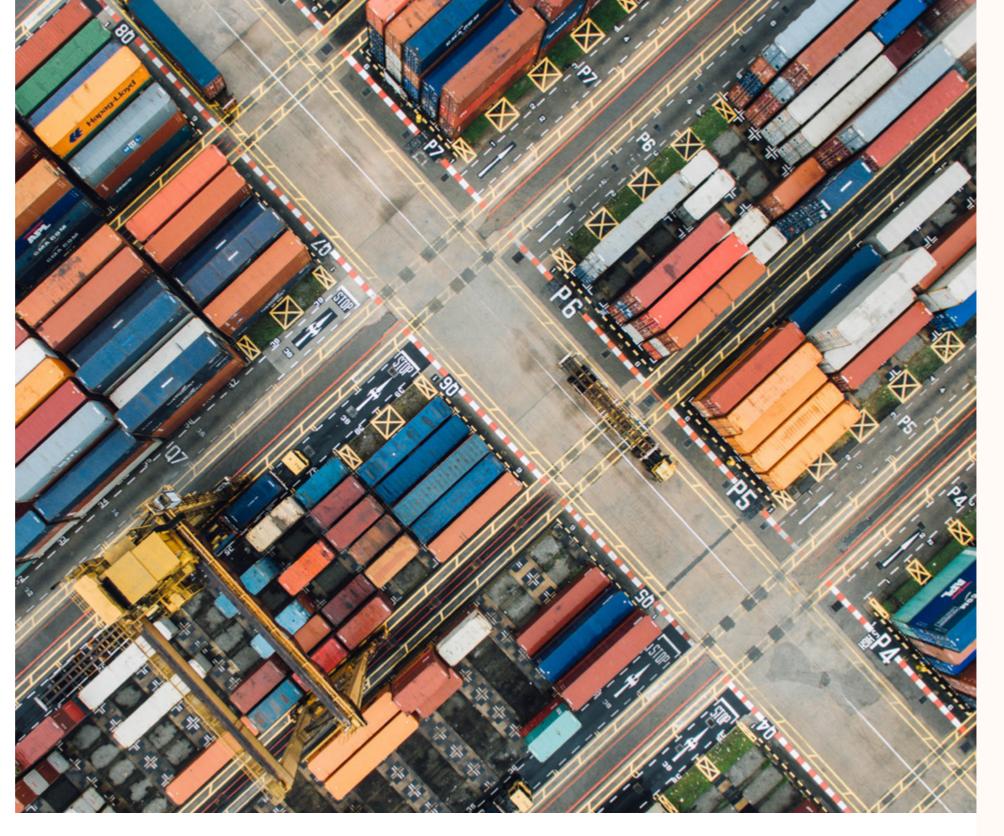
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COMPETITION LAW

We compete fairly and never collude with competitors.

- We compete in the marketplace by offering innovative and valuable solutions to our customers.
- We limit our interactions with competitors to the 'pre-competitive' space, for instance, in the context of trade associations or industry-wide initiatives.
- We generally operate globally in compliance with Swiss and EU Competition Law, unless applicable local laws are more restrictive.
- We explore new business opportunities independently from competitors unless we are specifically contemplating a joint project.
- Whenever we interact with our competitors, we are careful not to share information prohibited by competition law.
- We do not discuss or agree with competitors how to approach (or whether not to approach) specific customers or customer categories.

THINK ABOUT ___

- Even a simple exchange of commercially sensitive information between competitors can be illegal. Whether the sensitive information is shared or received, written or oral, true or false, it could expose SICPA.
- Most public procurement processes have confidentiality rules. We never discuss the terms of SICPA's proposals with other bidders.

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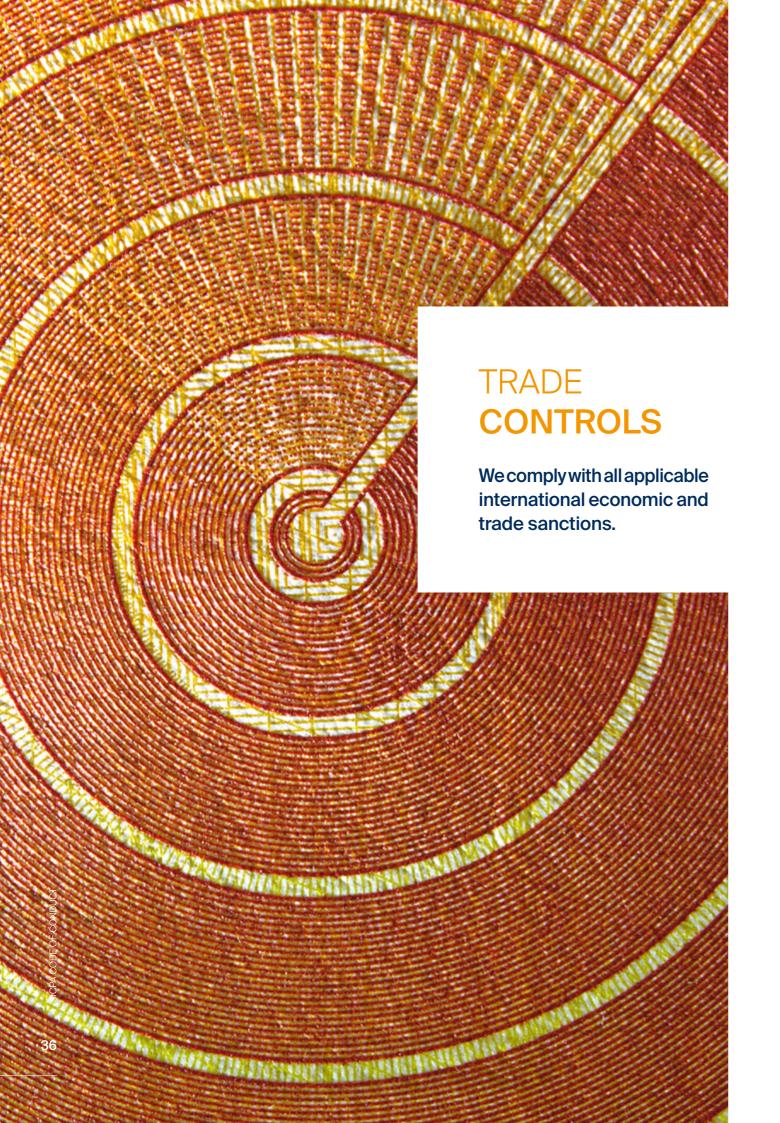
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Compliance

We comply with all applicable trade control laws and regulations, including restrictions around specific products, technologies and countries of destination.



Monitoring

We monitor regulatory changes constantly, and follow up if we are concerned that our product flows might breach them.



Screening

We screen our business partners continuously for potential changes in their sanction status.

THINK ABOUT __

• Note that specific rules apply to highly sanctioned countries, as defined in SICPA policy.

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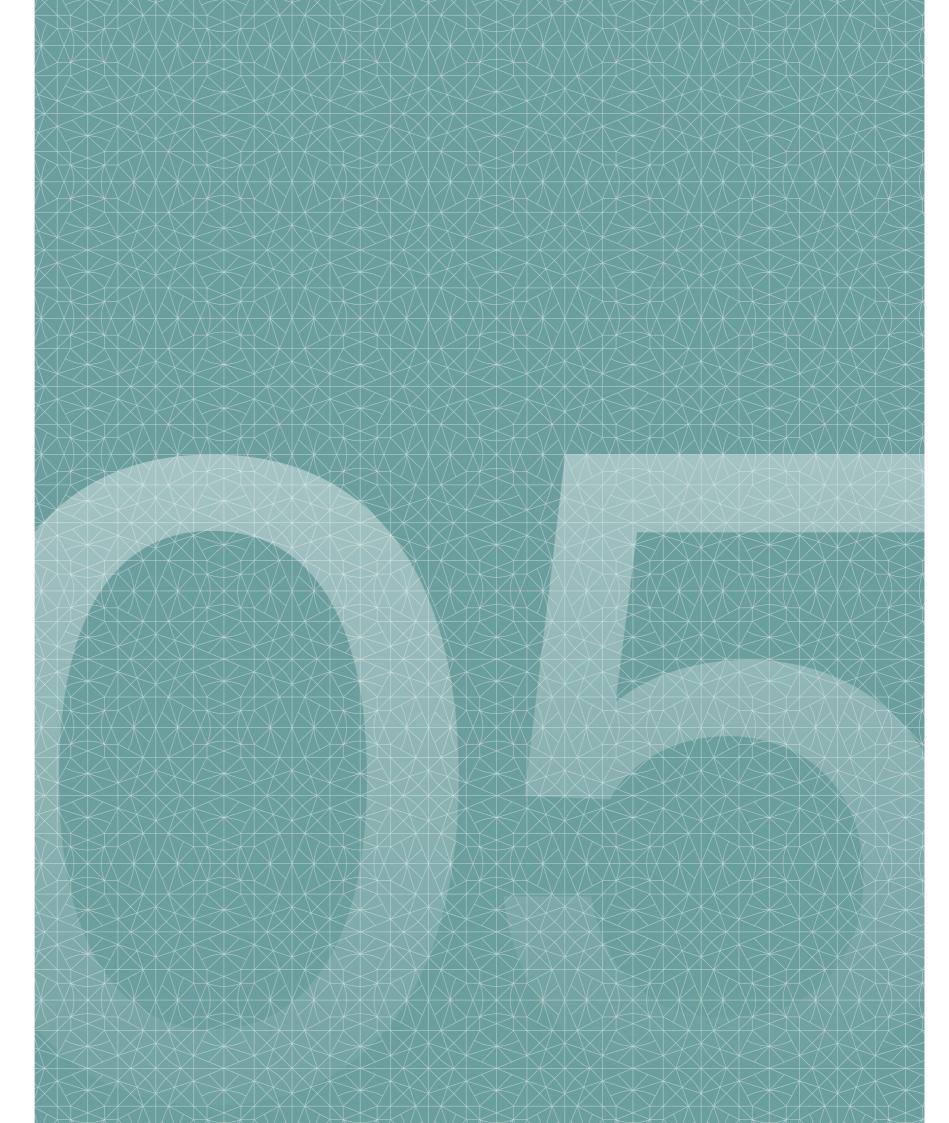
OUR FINANCIAL INTEGRITY

Reliable, accurate and honest financial reporting is crucial to measuring and monitoring our performance.

As a trusted partner and a good corporate citizen, we do not use financial information, transactions or operations to deceive or to bypass regulations.

IN THIS SECTION

- 5.1 FINANCIAL REPORTING
- 5.2 ANTI-MONEY LAUNDERING
- 5.3 FRAUD
- 5.4 CHARITABLE AND POLITICAL DONATIONS
- 5.5 LOBBYING AND POLITICAL AFFAIRS



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- We make sure we know how we earn and spend money.
- Our accounting and financial records reflect as accurately and completely as possible the reality of our operations.
- We comply with all applicable accounting standards and tax regulations to do with disclosure and documentation retention.

ANTI-MONEY LAUNDERING

We are proactive in ensuring we never take part in illegal financial flows.



As a responsible stakeholder in the global financial system, we comply with all applicable financial regulations.



We take every necessary step to know our business partners and the source of their funds.



We monitor our financial flows and follow up immediately on any suspected irregularity.

OUR FINANCIAL INTEGRITY



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- We are all required to follow processes and procedures designed to protect the company from fraudulent activities, and we promote a culture of honesty in all our operations.
- We do not try to bypass rules or gain undue advantage by making false statements.
- We neither act deceitfully to obtain unfair or illegal financial or personal gain, nor facilitate fraudulent behaviour.

THINK ABOUT _____

- Always act in SICPA's best interest and comply with applicable rules and regulations.
- Make sure exceptions to existing processes and procedures are reviewed and approved at the appropriate level.



CHARITABLE AND **POLITICAL DONATIONS**

We do not attempt to influence decisions through our donations, grants or charitable contributions.

Our community engagement commitments involve supporting charitable or public-interest initiatives through in-kind or financial contributions.

Such contributions always comply with relevant regulatory and transparency requirements and are never used to influence the outcome of a commercial transaction or a political decision.

We review all charitable contributions closely before approving them, to ensure they are compatible with SICPA's business activities and engagement approach, and to avoid the perception of impropriety.





OUR FINANCIAL INTEGRITY

LOBBYING AND **POLITICAL AFFAIRS**

We do not generally engage in lobbying activities.

We engage with government agencies, as our existing or prospective customers, in the normal course of our business activities.

We do not attempt to influence regulations or legislation through lobbying activities, directly or indirectly.

Any departure from this general rule needs to remain strictly within the limits of local regulations and requires prior approval from a member of the Executive Committee.

SECTION 06

We are a trusted partner for our customers across the globe, who depend on our reliability.

We are committed to good corporate citizenship and mindful of our impact on every stakeholder group we interact with.

IN THIS SECTION

6.1 PRODUCT SAFETY

ENVIRONMENT

INTELLECTUAL PROPERTY

6.4 CONFIDENTIALITY

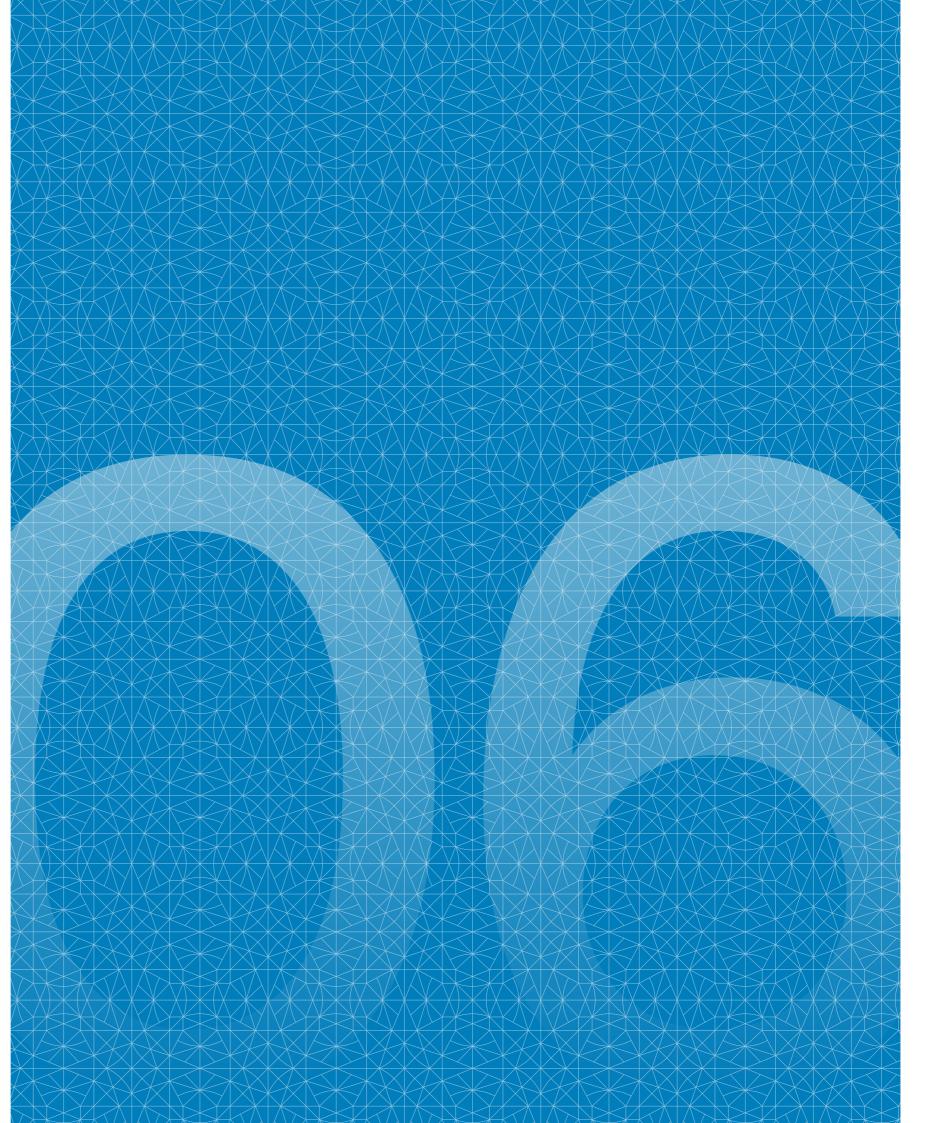
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6.8 LABOUR AND HUMAN RIGHTS

6.9 SUPPLY CHAIN



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PRODUCT **SAFETY**

We design and manufacture our products to be as safe as possible.



Our products meet applicable **regulations on chemicals** in all our markets and at all times.



We run effective, efficient change management programmes to maintain safety standards over time.



At SICPA we develop and manufacture our products with a long-term vision by carefully selecting raw materials and minimising hazards.



We proactively monitor product data and regulations, empowering our customers with all relevant safety information. 01 TRUST IS OUR BUSINESS

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We are committed to enhancing our environmental performance and making a positive contribution to nature and society.

We take environmental issues seriously, and know we have a responsibility to play our part in protecting the future of our planet.

ENVIRONMENT

Minimising our environmental footprint is one of our priorities. We evaluate and seek to reduce the impact of our products and operations on the environment.

We are committed to conducting business in compliance with environmental regulations and in line with recognised sustainable development frameworks.

WE AIM TO CONTINUOUSLY

- Enhance our environmental performance across our entire value chain by developing, manufacturing and promoting sustainable products and solutions.
- Increase circularity in our operations and value chain.
- Promote good environmental management practices with our supply chain partners.
- Promote and implement responsible sourcing and use of resources.
- Promote environmental and biodiversity protection.

THINK ABOUT

 Consider the possible negative impact of your day-to-day work activities on the environment and find ways to reduce it.

WE CONTINUOUSLY SEARCH FOR OPPORTUNITIES TO ADAPT OUR INDUSTRIAL PROCESSES AND BUSINESS PRACTICES BY



Reducing our emissions of greenhouse gases.



Implementing efficient water management practices.



Limiting our use of hazardous substances.



Optimising our energy usage.



Reducing our industrial waste.



ergy efficiency and recovery, and the use of renewable energy sources.

We constantly benchmark our environmental performance, seek external certifications and report on our progress.

Engaging with internal and external stakeholders, we take a holistic approach to protecting the environment and improving our performance.

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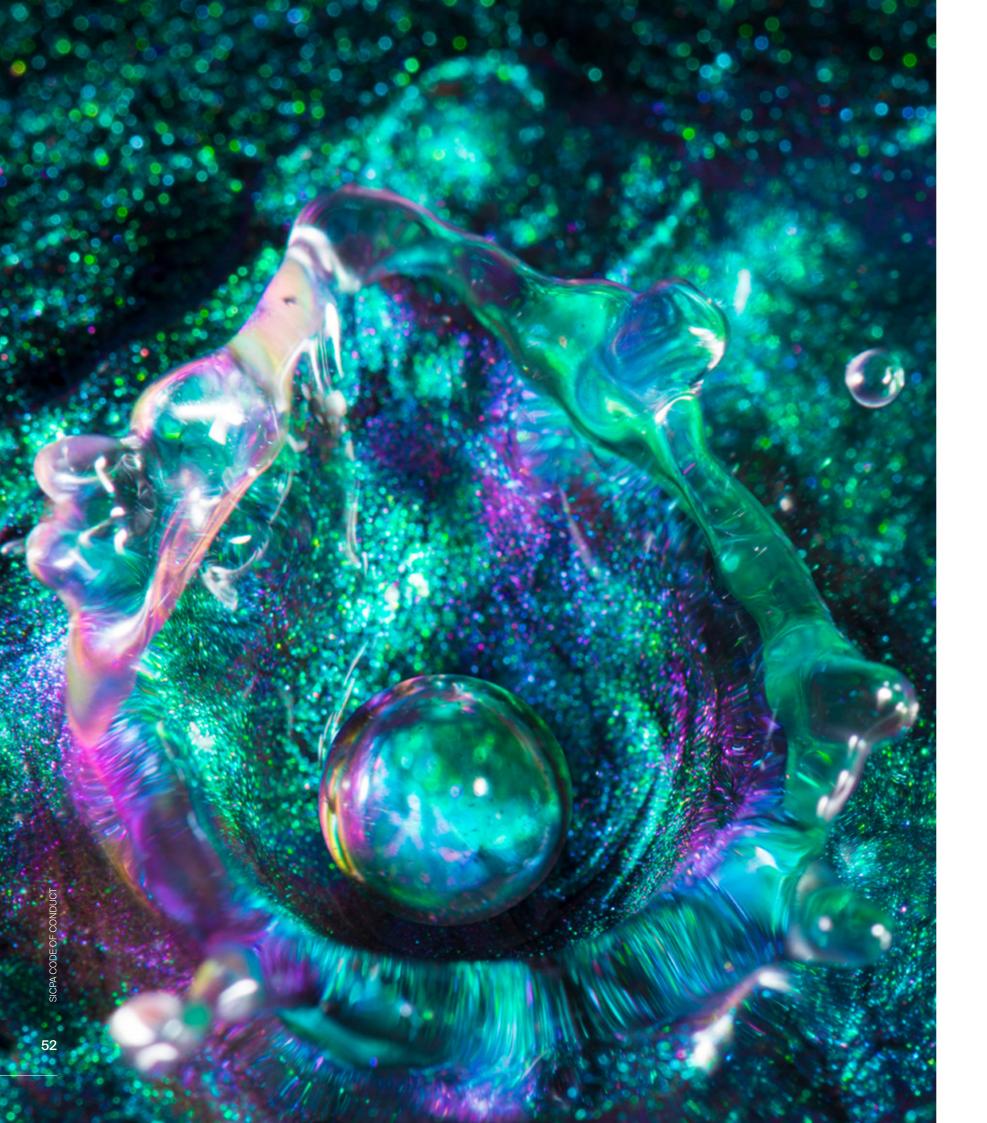
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INTELLECTUAL **PROPERTY**

We protect SICPA's intellectual property and respect that of others.

From designs to copyrights, patents and trademarks, SICPA's intellectual property is the result of our collective innovation.

SICPA owns intellectual property rights across multiple technologies and jurisdictions that support our business strategy.

- We do not use or share them for personal gain or outside a proper legal framework.
 - Nor do we misuse the intellectual property or confidential information of others in our work.

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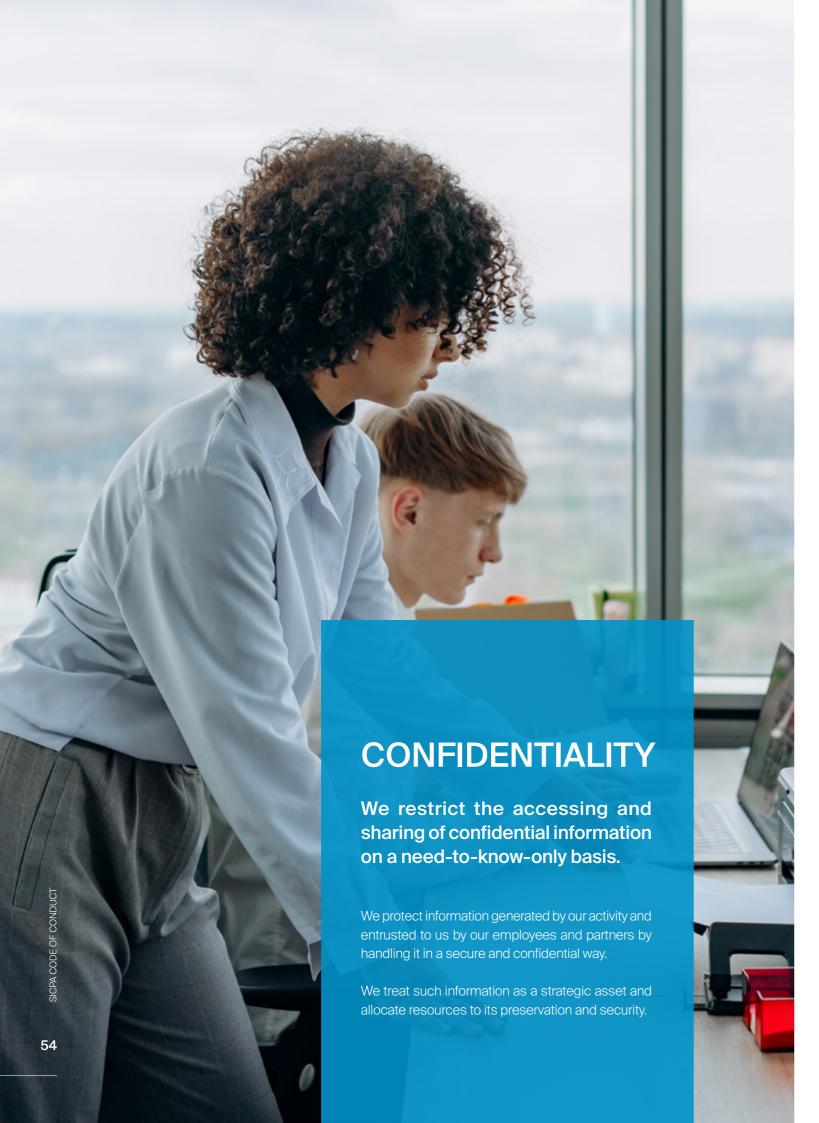
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THINK ABOUT

- Pay attention to the confidentiality level of the documents or files you work on and follow the appropriate sharing protocol.
- Make sure external parties always sign a formal non-disclosure agreement before sharing any information identified as confidential.

WE COMPLY WITH ALL INTERNAL POLICIES AND CONTRACTUAL OBLIGATIONS ON THE HANDLING OF CONFIDENTIAL INFORMATION BY



Identifying and clearly labelling information that is not publicly shareable across several levels of confidentiality, according to its criticality.



Restricting the sharing of information to colleagues and partners specifically accredited to access it.



Keeping ourselves up to date on confidentiality requirements.



Ensuring that confidential information in all formats is always securely stored and transferred.

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CYBER AND INFORMATION SECURITY

We protect our information systems from intrusion, manipulation and leakage.

At SICPA we believe our employees are our strongest defence against cyber security threats.



We rely on innovative people, technologies and processes to deliver value and Enable Trust for our customers.



We are alert to external threats that could compromise the use of our systems or the integrity of our files, and take all necessary precautions to reduce them using our Cyber and Information Security team's guidelines.



We keep ourselves up to date with the latest developments and requirements in information security, applying state-of-the-art cyber security standards — such as security by design and achieving the most rigorous certifications for our systems.

THINK ABOUT ___

- Encrypt sensitive data before sharing it externally or taking it with you on a business trip.
- Keep your computer and phone up to date with the latest version of SICPA-approved security software.



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DATA PROTECTION AND PRIVACY

We respect privacy and protect data with due care.

- We are committed to processing personal data with appropriate care, in line with applicable laws and privacy principles.
- We always respect individuals' privacy in order to earn and deserve their trust.
- We carefully select and monitor the third parties permitted to process or access personal data for which we are responsible.



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LABOUR AND **HUMAN RIGHTS**

We are firmly committed to respecting human rights everywhere we operate.



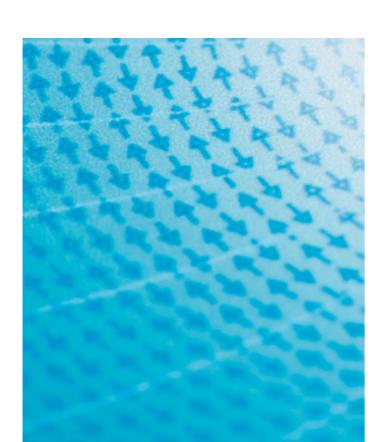
We respect the rights and **dignity of our workers in all countries** where we do business.



Our labour practices respect **human and social rights**.



We stand strongly against child labour and any form of forced labour.





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O7
GETTING HELP
AND GUIDANCE

SUPPLY CHAIN

We proactively address any potential violation of this Code in our supply chain.

We monitor potential issues related to our activities across the entire supply chain of our products and our services, from suppliers to customers, by:

- Tracing the origins of our raw materials, and enquiring about working conditions and environmental impact.
- Making sure we know how our products are used and by whom.

GETTING HELP AND GUIDANCE

We encourage our people and business partners to ask for information and advice whenever they are unsure about what is expected of them.

If you have concerns in relation to the application of our Code, policies or procedures, you should feel free to raise them without fear of retaliation.

IN THIS SECTION

7.1 WHOM TO ASK

7.2 RAISING CONCERNS
- SPEAK UP



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WHOM TO ASK

Confused or concerned? There are various resources at your disposal to help you clarify a situation. Your first stop is the global and local policies on the SICPA intranet.

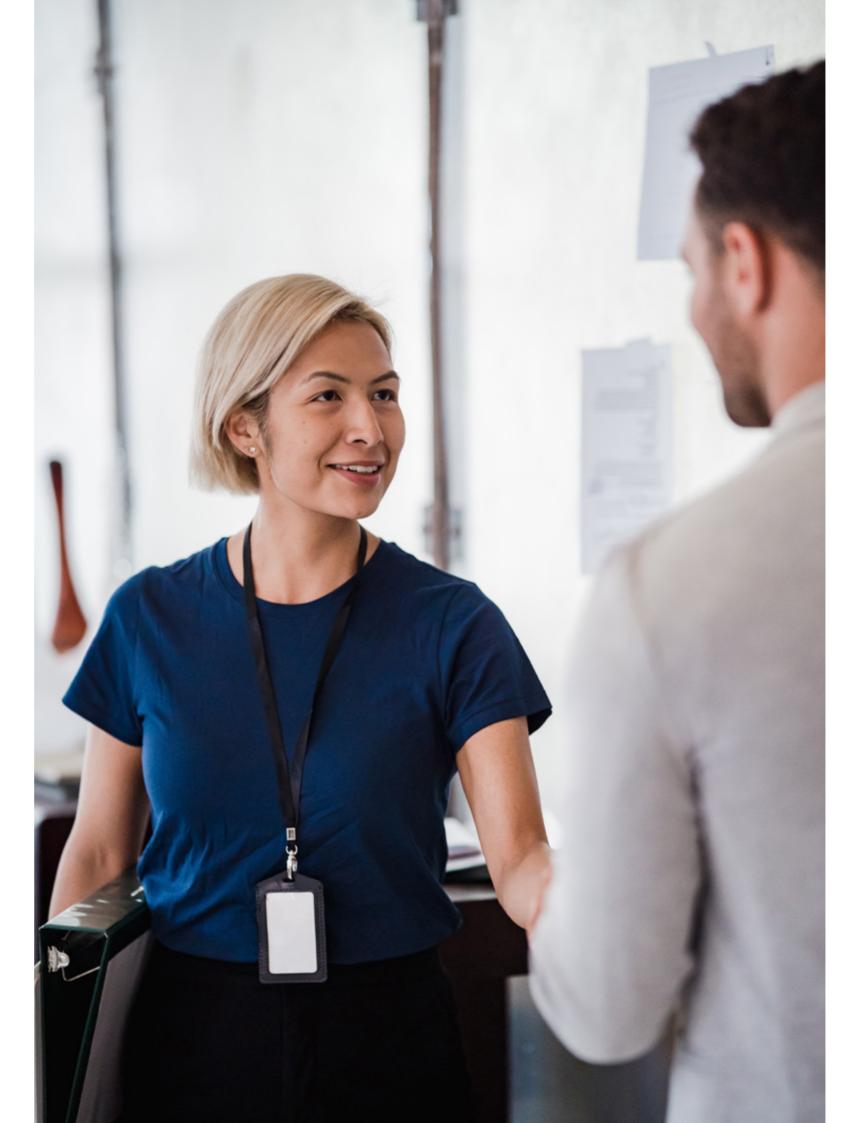


You should **read and make sure you understand** all SICPA policies, and do all training modules relevant to your activities.



For any further clarification or query, feel free to **ask your manager** or any manager from departments such as Human Resources, Finance, Compliance, Legal or Health and Safety, either locally or at global headquarters.

SICPA managers welcome questions and concerns from all employees.



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RAISING CONCERNS - SPEAK UP

We encourage every SICPA employee and external stakeholder to speak up if they have a concern, and we listen to and support them when they do.

SICPA SPEAK UP LINE

If you are uncomfortable with the idea of raising the issue in person with your manager or discussing it openly with other departments, you can use the SICPA Speak Up Line (our whistleblower tool). Available 24 hours a day internally and externally, it is operated by a third-party provider through a web-based portal and call centre. You will be offered the option to report anonymously.

Whichever route you take, your concern will be taken seriously and managed with the appropriate level of confidentiality.

SICPA has a non-retaliation policy and will not tolerate retaliation against a whistleblower who reports in good faith.

Any form of retaliation, including potential adverse effect on their career, pay, reputation or working conditions, is a clear violation of SICPA policy.

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In this Code of Conduct, the grammatical masculine gender has been used with a generic and unspecific value, understood as an unmarked gender that encompasses the totality of individuals and applies to all jointly and indistinctly.



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SICPA is certified to ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, ISO 27001:2013, ISO 17025:2017 and ISO 37001:2016, according to a worldwide deployment programme, in the framework of a unique Integrated Management System.

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