

CODE OF BUSINESS CONDUCT



Enabling trust

TABLE OF CONTENTS

1 INTRODUCTION	3
1.1 Scope.....	3
1.2 Application.....	3
2 SICPA WORKPLACE	3
2.1 Health, Safety and Respect.....	3
2.2 SICPA Assets.....	4
2.3 Information and Communication Media	4
3 SICPA BUSINESS PRACTICE	5
3.1 No Bribery and No Corruption	5
3.2 Recording and Reporting	5
3.3 No Conflict of Interest	5
3.4 Fair Competition	5
3.5 Sanctions, Embargos and No Money Laundering	6
3.6 Gifts and Hospitality.....	6
4 EDUCATION, TRAINING AND QUESTIONS	6
5 VIOLATIONS	7
6 RELATED DOCUMENTS	7

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1 INTRODUCTION

The reputation of SICPA is built on the collective efforts of all SICPA employees.

Every employee plays an important part in SICPA's pursuit of excellence. The Code of Business Conduct (Code) sets out the rules and provides guidance on the required standard of behaviour.

All employees are expected to perform their jobs in the best interests of SICPA.

Breaking rules is never in the interest of SICPA.

1.1 Scope

This Code applies to all SICPA employees, directors and officers ("employees"), at all levels of SICPA's world-wide organizations.

All persons, including service providers, subcontractors and business partners are required to respect the Code when acting for or on behalf of SICPA.

1.2 Application

This Code governs all other policies, rules and regulations or guidelines adopted by SICPA.

Compliance with the law is an absolute requirement.

Within the legal framework, this Code provides a frame of reference against which to measure activities when working for or representing SICPA. Not all specific situations can be anticipated in advance. It is nevertheless important that the Code is used in all situations, if necessary with good judgment and common sense.

2 SICPA WORKPLACE

2.1 Health, Safety and Respect

SICPA is committed to providing a safe and healthy work place for employees, including service providers, subcontractors and business partners.

SICPA is committed to providing fair working conditions, and to maintaining a workplace free from discrimination or harassment based on race, gender, national origin, disability or sexual orientation.

This is also extended to service providers, subcontractors and business partners.

All employees are expected to adhere to the same standards, acting with integrity and behaving in an open, transparent and trustworthy manner at all times and in all places.

2.2 SICPA Assets

All employees are responsible for protecting SICPA's assets.

SICPA's assets include physical assets and proprietary assets as well as employee and third party confidential information.

Physical assets (such as equipment, material and facilities) must be safeguarded from loss, misuse, theft or waste.

Proprietary assets (such as manufacturing and engineering ideas, strategies, business ideas, business information, business plans, trade secrets, know-how, and intellectual property) are the core of SICPA and improper disclosure is prohibited. Proprietary assets must be protected by keeping them confidential. Unless required by law or authorized accordingly, employees who receive or learn of confidential information appertaining to SICPA or others may only disclose that information within SICPA on a need-to-know basis. They may not disclose that information to any third party (including friends and family members) nor make any other unauthorized use of such information.

Furthermore, all necessary and reasonable measures must be taken to safeguard and protect physical and proprietary assets. Employees must ensure all sensitive information is appropriately protected even when it is not formally classified. Particular care and specific measures must be taken where information is classified as a 'confidential' or higher category. Disclosure can be made only to properly authorized persons. This obligation continues beyond the termination of employment.

All confidential information must remain confidential and is only permitted to persons with proper authority. All data must be treated in accordance with data protection laws.

2.3 Information and Communication Media

SICPA provides information and communication media, such as IT systems, internet access, e-mail accounts, phones, etc. for business purposes.

The use of SICPA's information and communication system for illegal or unethical purposes is prohibited.

It is also prohibited to disclose any SICPA business related information.

3 SICPA BUSINESS PRACTICE

3.1 No Bribery and No Corruption

Corruption and bribery is prohibited for all SICPA employees and for all SICPA organizations and affiliates.

It is never acceptable to offer, give, authorize or receive any form of bribes or kick-backs, to or from public officials or private persons.

This prohibition applies equally to consultants, agents, subcontractors, sales agents and other associates.

For more details, see SICPA's Anti-Bribery and Anti-Corruption Policy.

3.2 Recording and Reporting

All business transactions and communications must be reported in a truthful, accurate and timely manner.

The creation or use of false, misleading or incomplete records or supporting documents is prohibited. Withholding important information or representing it incompletely or misleadingly is not allowed.

3.3 No Conflict of Interest

All employees must make business decisions in the best interests of SICPA.

A conflict of interest is any situation where the personal interest (private, professional or business) interferes, or appears to interfere, with the ability to perform the job in the best interests of SICPA. Personal interest also includes the interests of family, friends or close business contacts.

Conflicts of interest must be avoided. If this is not possible, the employee must promptly disclose the conflict and seek guidance from appropriate sources such as supervisors, Human Resources, Legal, Local Compliance Officer, Compliance Coordinator or Group Compliance Officer.

If in doubt whether there is a conflict of interest, remember that if you find yourself asking this question, there mostly likely to be one.

3.4 Fair Competition

SICPA believes in the benefits of free competition and recognizes that it has to compete rigorously and fairly, in compliance with the applicable antitrust and competition laws.

The rules and laws on antitrust and competition are complex and depend on the specific country.

In summary, employees shall never directly or indirectly engage in discussions or enter into agreements with competitors, whether formally or informally, on prices, on commercial policies, on allocations of customers or territories or product markets and on the exchange of competitive information.

Employees must deal with customers and suppliers in a fair manner.
For more details, see SICPA's Competition Law Policy

3.5 Sanctions, Embargos and No Money Laundering

SICPA is committed to complying with the applicable export and import laws, including trade sanctions, embargoes and other laws, regulations and government orders that affect international trade.

SICPA seeks to do business only with business partners that conduct business activities in a legal manner and whose funds come from legal sources. In order to prevent SICPA being used as a means to launder money, all employees must be vigilant and alert to the possibility of irregular payments or behaviours and report any suspicious incidences in a timely manner.

3.6 Gifts and Hospitality

Offering and receiving gifts and hospitality is a part of culture in some countries where SICPA operates.

However, gifts and hospitality must always be moderate, i.e. so insignificant that it is deemed impossible to exert influence.

All employees must exercise common sense, discretion and sound judgement before offering or receiving gifts or hospitality. Sound judgement takes into consideration that breaking the law is never in the interest of SICPA.

4 EDUCATION, TRAINING AND QUESTIONS

Each employee receives a copy of this Code and is offered introductory and regular compliance training.

All employees are expected to enforce the Code consistently. Employees with a supervisory function must lead by example and must create an environment where employees feel comfortable to ask questions and seek guidance.

In the event of questions or uncertainty, guidance and direction should be sought from the many sources available such as supervisors, Human Resources, Legal, Local Compliance Officer, Compliance Coordinator or Group Compliance Officer.

5 VIOLATIONS

All employees must adhere to the applicable law and the Code at any time and in any place. Violation of the rules as set-out in this Code will lead to serious consequences, including disciplinary action, termination of employment and possible civil and criminal penalties – for the employee and for SICPA.

Violations and suspected violations must be reported promptly to any senior manager or to the Group Compliance Officer (compliance@sicpa.com).

Unless the employee reporting a violation or suspected violation has him/herself violated the Code or has acted in bad faith, SICPA will protect the employee against retaliation and if requested will keep the employee's identity confidential provided this is aligned with SICPA's commitment to appropriately protect employees' rights.

6 RELATED DOCUMENTS

Refer to related documents for specific application (application documents). List of internal documents the policy refers to:

#	ID Number	Title
1	5489	Anti-Bribery and Anti-Corruption Policy
2	5491	Competition Law Policy