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CORPORATE SOCIAL RESPONSIBILITY - CODE OF CONDUCT



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IDENTA Ausweissysteme GmbH

Foreword by the Executive Board:

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1. Purpose, scope of application

IDENTA's public image is essentially shaped by the appearance, actions and behaviour of each and every one of us. Each of us is jointly responsible for ensuring that we as a company live up to our social responsibility both at home and abroad.

High ethical and legal standards underlie both our strategic considerations and our day-to-day business. This Code of Conduct represents a regulatory framework that applies to every **member of the company** (regardless of their position in IDENTA) and to every **business partner**. It is intended to help overcome ethical and legal challenges in our daily work and shapes our dealings with our business partners, suppliers, employees and the public. This Code of Conduct forms a minimum standard for all IDENTA employees and is **binding for** them.

Violations of the Code of Conduct are therefore consistently pursued and sanctioned in the interest of all. Every employee is obliged to inform themselves about the existing internal and external regulations to ensure that they act in accordance with them. If there is any doubt as to whether an event or action is in accordance with IDENTA's regulations, employees should contact their supervisor in confidence, alternatively in digital form to the IDENTA grievance box (on Confluence) or anonymously (in paper form) drop their message in the IDENTA grievance mailbox.

Each supervisor must ensure that his or her organisational area complies with the requirements of the Code of Conduct.

2. Corporate Social Responsibility CSR - Message from the IDENTA Executive Board

IDENTA stands behind their corporate social responsibility towards all stakeholders such as customers, suppliers, employees, the community and institutions. IDENTA acts as responsibly, sustainably and safely as possible in all processes. Sustainable corporate management is derived from this. We know that in addition to economic factors, environmental, social and cultural factors also have a direct influence on IDENTA's success.

We are increasingly taking into account the issues and wishes of all our stakeholders in our business decisions.

We invest intensively and continuously in the qualifications of our employees, as well as in the safety of our corporate processes, products and services.

Manufacturing our products in the most resource-efficient way possible is an important topic at IDENTA. We inform our customers about the sustainability of our products and services in order to support them in reducing their own ecological footprint.

We work closely with our suppliers so that we know where our merchandise and raw materials come from and that they comply with the required environmental and social standards when procuring materials.

Fair working conditions and fair pay for our employees are important to us. This includes good health, safety and a balanced social environment, which we support for our part.

We act resource-efficiently and design mobility and logistics to be as environmentally friendly as possible.

We also have a social responsibility, especially in Villingen-Schwenningen, which is characterized by small and medium-sized businesses, and therefore support local associations and regional suppliers and service providers.

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3. Values, Mission & Vision

VISION

IDENTA's vision is to enable everyone to have the right to security and at the same time act socially, ecologically and sustainably.

MISSION

With our work at IDENTA, we make a small but significant contribution to the safety of our fellow human beings, and we always take on new challenges with a sense of responsibility and innovative thinking.

VALUES

Quality: Make every product and every service a promise of quality!

Agility: Be flexible in your actions and offer the greatest possible customer value!

Progress: Take on new challenges and make progress!

Responsibility: Work conscientiously, provide a sustainable living environment for yourself and your fellow human beings!

4. Conduct and respect in dealing with each other and business partners

Every employee is an "ambassador" for IDENTA and its values. IDENTA expects its employees to behave in a friendly, professional, fair and decent manner both inside and outside the company. All employees are obliged to ensure a fast and smooth exchange of information within the company. Knowledge shall not be unlawfully withheld, distorted or selectively shared. Information must be passed on correctly and completely to other areas, provided that IDENTA's interests are not endangered.

IDENTA does not tolerate discrimination or harassment of any kind, whether based on origin, gender, disability, religion, age, sexual orientation, political views or trade union activity. In contrast, the issues of health and safety are advanced.

Therefore, IDENTA promotes a culture that values and encourages open feedback and collaboration from all stakeholders. The only essential criteria for employee development are performance, knowledge, potential, experience, behaviour and integrity.

5. Human rights and jobs

IDENTA has the task of respecting and advancing internationally applicable human rights - whether internally or also with its business partners. We demand the minimum requirements for environmental and social standards equally from our suppliers.

5.1 Prohibition of child labour and forced labour:

IDENTA does not tolerate child labour or forced labour in its own operations or those of its business partners. IDENTA sees it as its social responsibility to do its part by not employing anyone under the age of 16.

5.2 Equal opportunities

IDENTA follows the current collective agreements and offers its employees fair remuneration. Auxiliary staff are paid well above the minimum wage according to the usual wage rates. Equal wages apply for work of equal value for all employees.

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5.3 Working time

Compliance with the legal requirements of working time regulations is monitored within the framework of time management. IDENTA supports its employees to bring the professional requirements and family obligations into good harmony, e.g. with the introduction of flextime; flexible "overtime clearance".

5.4 Staff qualification

IDENTA relies on continuous training measures across the board to develop diverse opportunities, talents and potentials. In view of the ever-increasing challenges for employees and the demographic development, health promotion measures are offered.

5.5 Workers' rights/voice/feedback:

The legal requirements regarding freedom of association and assembly are followed.

Employee feedback is collected and evaluated via the suggestion system in the form of the IDENTA suggestion boxes (digital) or anonymously (in paper form) in the IDENTA suggestion box.

Sustainability issues can also be introduced here.

To further promote employee participation, IDENTA plans to delegate the implementation of measures to various employees, so that a large number of people will be involved in the topic of environmental protection and sustainability.

6. Confidentiality

Company and business secrets must be treated confidentially; this also applies to other information which IDENTA, its contractual partners and customers have or could have an interest in keeping confidential.

Such information may not be disclosed to unauthorised persons without permission and must also be protected in an appropriate manner from the insight of third parties and employees who are not involved.

All employees are contractually bound to observe confidentiality.

7. Data protection and IT security

The applicable laws on the protection of privacy and personal data of employees and business partners, suppliers and customers must be observed. Employees are obliged to comply with all data protection regulations and requirements, especially when using sensitive customer data.

Due to the intensive use of IT systems, IDENTA's business activities are highly dependent on their functionality and availability. The risks arising from this dependency are managed and minimised by the company's IT security guidelines.

8. Conflicts of interest - separation of private and corporate interests

IDENTA expects its employees to be loyal to the company. Every employee must separate his or her private interests from the interests of IDENTA. In internal decisions or business relations with third parties, only objective, business criteria count (always in the interest of IDENTA).

Secondary employment, professional consulting activities or significant financial interests in a competitor, customer or supplier are subject to approval and must not negatively affect IDENTA's interests.

Significant financial interests of close family members in a competitor, client or supplier must be disclosed to the line manager to ensure that the employee cannot be subject to a conflict of interest.

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9. Commitment to professionalism and quality

IDENTA regards customers as well as suppliers as valuable partners and intends a mutually satisfying and long-term partnership.

IDENTA develops and produces high-quality products and services with constant innovation and high safety standards. The aim is to satisfy the customer, who is the focus of interest, with impeccable, secure and trustworthy products and services.

For this reason, all IDENTA employees commit themselves to professional, cooperative behaviour and dialogue with all business partners by observing the basic principles for ethical behaviour, quality standards and resource-saving actions laid down here.

10. Financial accountability and accurate record keeping

IDENTA's accounts are kept in accordance with the principles of proper accounting. As a medium-sized corporation, IDENTA's balance sheet is certified annually by an independent auditor.

11. Corruption or bribery

IDENTA does not tolerate any form of corruption, bribery, venality or other illegal granting of advantages. Violations by employees regularly lead to termination of employment and criminal prosecution.

12. Acceptance and granting of gifts and other benefits

Gifts and gratuities from or to business partners are, to a certain extent, in line with normal regional business practices. However, gifts and benefits may not be given or accepted if they could lead to a conflict of interest and damage IDENTA's reputation.

Therefore, no employee may accept or grant benefits - in any form whatsoever, especially personal gifts of an inappropriate value - that could reasonably be expected to influence business decisions or transactions. Invitations must be within the limits of hospitality customary in the country of business. The acceptance and granting of money is generally prohibited. In cases of doubt, consult with the supervisor or the HR department or management.

13. Prevention of money laundering - no unlawful activities

IDENTA supports all necessary measures to avoid money laundering within its sphere of influence and does everything to avoid being misused for other illegal purposes. Employees must neither tolerate nor support illegal activities in their working environment.

14. Fair competition, competition and antitrust law

IDENTA is fully committed to free competition by fair means and to strict compliance with antitrust law and applicable competition law. IDENTA's business partners must also comply with these rules.

15. Intellectual property and counterfeit parts

Intellectual property is recognised as: Patents, trademarks, copyrights, designs, models, samples and business information such as expertise or information entrusted by customers or suppliers.

IDENTA requires its suppliers to develop, implement and maintain effective methods and processes to detect and minimize the risk of introducing counterfeit parts and materials into our supply

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chain. When detected, suppliers are expected to implement effective procedures to quarantine the product and inform recipients of counterfeit products.

16. Export controls and economic sanctions

IDENTA undertakes to comply with all applicable export, import and trade laws in all countries in which IDENTA does business.

17. Sustainability, protection of the environment

The importance of environmental thinking is illustrated by the certification according to DIN EN ISO 14001. IDENTA encourages its business partners to obtain such or comparable certification.

Resources

The economical use of natural resources is an obligation for all managers and employees of the company. This conserves natural resources and ensures the efficiency of processes.

Legislation

European, federal, Baden-Württemberg and municipal legislation is appropriately identified and implemented:

This increases the legal certainty of the company and reduces the liability risk.

Waste

Best possible use of resources, avoidance and consistent separation of waste are systematically improved and optimized. In this way, IDENTA contributes to reducing the waste burden on the public and at the same time reduces its disposal costs.

Climate-relevant emissions

Pollutant emissions are reduced by using the best available technology and optimizing our production processes. This keeps the air clean; IDENTA respects the interests of the neighbourhood and the public as a whole.

Employees

The qualification, information and involvement of all employees in environmental management issues is the basis of the entire EMS. This achieves the highest level of integration and acceptance throughout the company.

Continuous improvement

IDENTA is committed to continuously improving its environmental performance.

18. Community

IDENTA's management is personally as well as operationally well integrated into the community and the region. Support for various groups, associations and events or regional suppliers and service providers is preferred.

19. Law-abiding, policy-compliant behaviour, alarming concerns

Employees: They shall comply with all relevant laws and regulations in their work environment as well as with internal instructions and guidelines. The documentation of all external and internal business activities must be complete and flawless in accordance with the law and, in addition, with the regulations applicable at IDENTA.

IDENTA: The management bears the overall and ultimate responsibility for compliance with the legal requirements.

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19.1 Whistleblowing procedure

IDENTA has a whistleblowing procedure for unlawful conduct in the company or business environment that is a criminal offence or directed against the company - but also for reports of human rights violations, labour law violations and corrupt acts.

Employees: IDENTA employees can contact the IDENTA Ethics Committee anonymously or openly in the event of a suspicion via a specially created e-mail address.

Business partners: You will find an eMail address for your request on the company website, but you can also send IDENTA anonymously (in paper form) to the address: Ethics Committee, c/o IDENTA Ausweissysteme GmbH, Steinkirchring 16, 78056 Villingen-Schwenningen.

19.2 Implementation/violation of the Code of Conduct

Employees: No employee shall suffer any disadvantage in the company as a result of compliance with the above principles. Employees are required to report violations of the CoC. Employees should first contact their immediate supervisor. Submissions can be made by name or, if desired, anonymously, whereby anonymous written submissions can be made in paper form in the IDENTA grievance box.

Business partner: IDENTA will take appropriate measures to interrupt or terminate the business relationship in the event of a violation or infringement of the Code of Conduct.

IDENTA: Violation of this Code of Conduct will result in serious consequences for IDENTA, such as termination of contracts, loss of future business, fines, criminal and civil penalties.

20. Entry into force

The policy comes into force on 01.03.2021 and must be observed by employees and business partners (suppliers, customers, partners).