



ACTING RESPONSIBLY

Our code of conduct

Creating Confidence

CODE OF CONDUCT

Content and Key Principles

WE TAKE RESPONSIBILITY

HUMANITY IS OUR FOCUS

WE ACT RELIABLY AND WITH INTEGRITY

PROTECTION AND SECURITY OF ESSENTIAL VALUES SHAPE OUR ACTIONS AND OUR SUCCESS

WE TAKE THE RESPONSIBILITY FOR OUR INTERNATIONAL ACTIONS SERIOUSLY

WE CONTRIBUTE TO A SUSTAINABLE FUTURE

WE ARE HERE TO HELP!

WE CREATE TRUST

The G+D code of conduct

Lead

Decide

Concerns

We act responsibly and lawfully.

We act as role models and inspire others to live the G+D values.

We take decisions responsibly and carefully.

We address concerns promptly and fully.

Basic working conditions

Human rights and labour standards

We respect and care for each other.

We respect human rights.

Antitrust and competition law

Anti-corruption

Conflicts of interest

Tax and customs regulations

Accounting and business documentation

We succeed as fair competitors.

We act with the highest integrity and reject any form of bribery.

We make business decisions only in the best interests of G+D.

We comply with applicable tax and customs law, and reject aggressive tax structuring models.

We create transparency through correct accounting and proper documentation of business transactions

Product portfolio

Data protection and digital responsibility

Information security

External communication

Company property

We engineer security technology that creates trust.

We protect personal data and shape trust in a digital world.

We protect confidential information, trade secrets, and intellectual property.

We communicate in a consistent and coordinated manner with external parties.

We handle work equipment with care.

International business relations

Money-laundering prevention

We do business across country borders, but always within the legal boundaries.

We give money-laundering no chance.

Environment and society

We actively contribute to the preservation of a world worth living in.

Contact

Here you can find more information.

DEAR COLLEAGUES,

Creating confidence – our joint promise to our customers, partners, owners, society and all employees in the Group motivates us to give our best every day and to create confidence through our products and our behaviour.

Since 1852, G+D has been a trusted partner for institutions with the highest standards. Throughout its history, our company has continuously evolved and expanded its portfolio with technological innovations. Today, we secure the essential values of this world through security technology that creates trust.

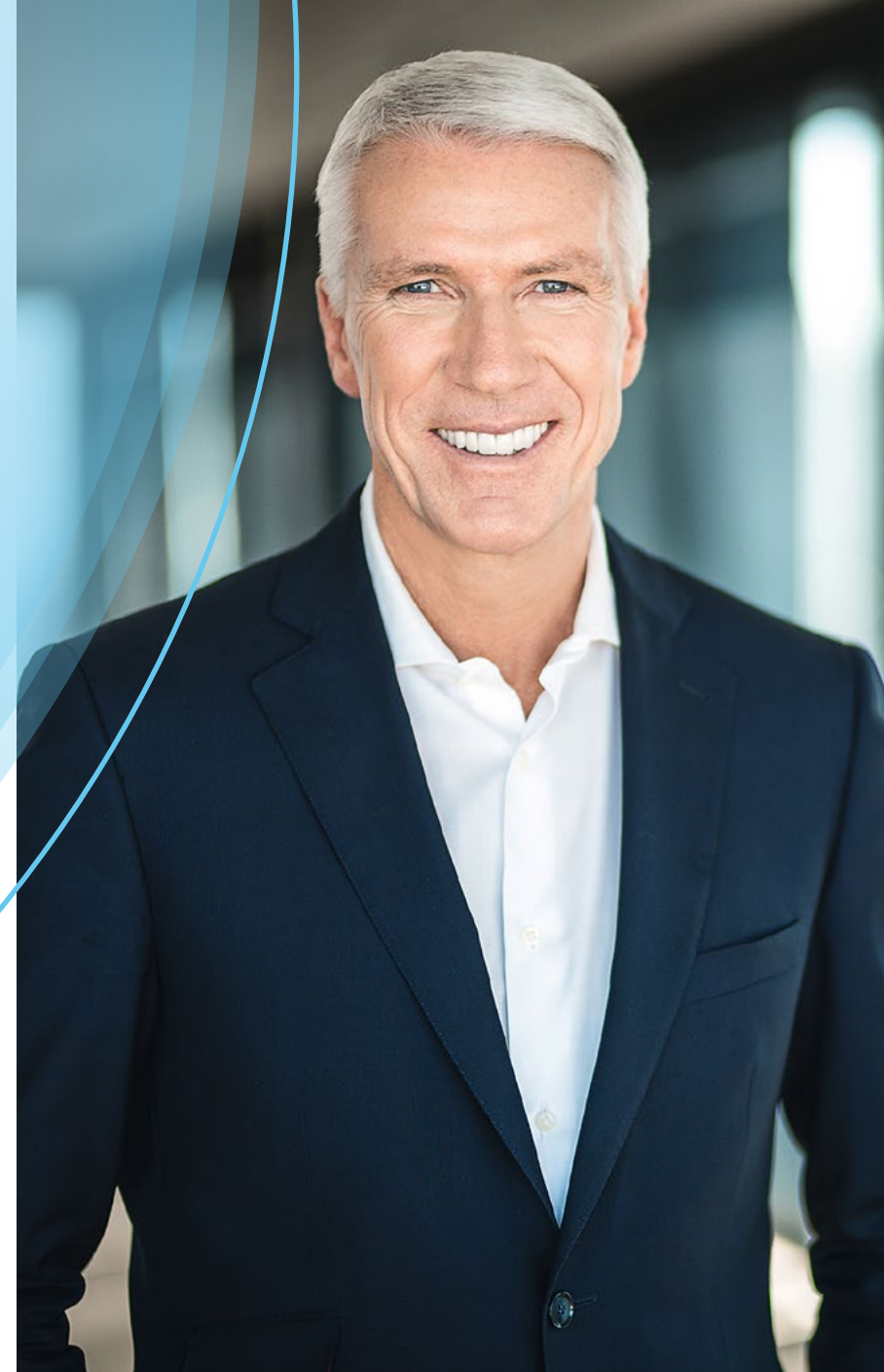
Trust through our products and in our company has been and remains the core of G+D's long-standing success. Responsible, sustainable and lawful behaviour form the foundation for this.

Trust that has been built up over a long time can be lost quickly and is very difficult to regain. We must always be aware of this when we carry out our work. Our customers and business partners, as well as our owners and society, must be able to trust that we make the right decisions and do the right thing. That is why it depends on each and every one of us, no matter in which country or in which task we work for G+D.

The G+D code of conduct lays down our basic rules and principles that everyone must observe. They are not negotiable. We do not accept any violations. The many examples and the guidance included in the code of conduct are designed to help you do the right thing in your work. Especially in difficult situations, it helps if we remember the G+D values and principles.

Every employee of G+D must be familiar with these rules, and I personally ask you to read and act according to the code of conduct. If you are ever unsure about the right thing to do, please feel encouraged to speak up and ask for advice. The code of conduct also provides you with relevant guidance in this regard.

Dr. Ralf Wintergerst
Group CEO Giesecke+Devrient



THE G+D CODE OF CONDUCT

WE ACT RESPONSIBLY AND LAWFULLY.

As a global company, we are convinced that responsible and lawful conduct is a fundamental prerequisite for Giesecke+Devrient's (G+D) business success. It forms the basis for the trust that customers, business partners, owners, employees, and also society place in us.

THE LEGAL SYSTEM forms the immutable framework for all our actions, and ensures the stability, security, and predictability that we need to achieve our corporate goals:

- We are committed to lawfulness and compliance with all relevant laws in countries where we operate.
- Under no circumstances will we tolerate employees committing criminal offences or misdemeanours in the erroneous belief that they are serving the interests of the company". The "zero tolerance" principle applies.
- 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.
- In order to avoid taking a potentially unlawful action, we are obliged to consult Legal or Compliance in the event of doubt.

OUR CORPORATE VALUES – reliability, collaboration, and innovation – serve as a guide for our work. They shape our dealings with each other and form the foundation of our corporate culture.

OUR CODE OF CONDUCT is G+D's constitution which applies for all employees of the Group. It is based on G+D's core values and principles. For employees, it is the guideline to which they orient themselves in their work.

More detailed guides, policies and instructions can be consulted on the G+D intranet "Digital Workplace" (DWP).



WHAT IS EXPECTED OF ME UNDER THE CODE OF CONDUCT?

To comply with the G+D code of conduct, we adhere to:

- All relevant laws and legal regulations
- All internal guidelines and regulations
- Ethical business practices and conduct with integrity



THE G+D CODE OF CONDUCT APPLIES TO EVERYONE!

The code of conduct applies to the management, executives, and employees of all G+D Group companies worldwide. It also applies to joint ventures within the Group as soon as its application has been decided by the competent bodies or agreed, e.g. in the articles of association.



LEAD

WE ACT AS ROLE MODELS AND INSPIRE OTHERS TO LIVE OUR VALUES.

Business success, trust, responsible leadership and integrity are inextricably linked at G+D. An important task of every manager is to ensure that the corporate values as well as the principles of conduct described in this code of conduct are anchored in the company's day-to-day business.

As leaders, we have a special responsibility:

- We take on our responsibility, act with integrity, and create a working environment characterized by trust, non-discrimination and equal opportunities.
- We are role models in complying with the law, corporate values, and principles of conduct. In doing so, we also ensure that our employees know the importance of the G+D code of conduct and behave accordingly.
- We are available as a point of contact for employees who are unclear about legal provisions or internal regulations. In difficult situations we provide advice and direction.
- We encourage our employees to speak up and raise questions or concerns. We ourselves also speak up when something does not feel right.
- We clearly oppose any kind of discrimination.
- We take every indication of possible misconduct seriously and direct this to the responsible bodies.
- We protect the identity of the person reporting a potential breach, and we do not allow the person reporting to suffer any disadvantage.
- We know and discuss the most important risks in our area of responsibility, and fulfil our organisational and supervisory duties.

However, our special responsibility and our duties as managers do not release our employees from their own responsibility. Together, we ensure compliance with laws and internal guidelines.



WHAT ARE OUR ORGANISATIONAL AND SUPERVISORY DUTIES?

As managers, we can also be held responsible for the acts or omissions of those under our supervision, in particular our employees.

- We carefully select employees solely on the basis of professional qualifications, ability, and suitability. The duty of care increases with the importance of the task to be performed by the employee.
- We assign tasks in a precise and comprehensible way, and provide access to all necessary working tools and information.
- We ensure that the assigned obligations and tasks are fulfilled.
- We explain the importance of acting lawfully and with integrity in the performance of duties. We make it clear that violations of legal and internal company requirements will not be accepted and that appropriate disciplinary action will follow.





DECIDE

WE DECIDE RESPONSIBLY AND CAREFULLY.

In most cases it is clear how we should behave correctly and what decision we should make. However, situations can arise that are not clear-cut, for example because facts cannot be fully clarified, or we are confronted with conflicting priorities or contradictory demands. Or maybe an action does not violate any law, but we intuitively feel that something is wrong. In such a situation, it is important to take this concern seriously. Because not everything that is legally possible is always right. When we are uncertain about a situation, we take the necessary time, and decide carefully in order to make correct and prudent decisions.

The following questions can provide guidance:

- Do I have all the information I need to make a decision?
- Are my actions legal and in line with internal policies?
- Do my actions comply with the code of conduct and the G+D values?
- Are my actions and decisions exemplary? Would it be good and right if others did exactly the same?
- Am I making this decision freely, or am I under pressure (e.g. pressure to succeed, pressure from third parties)?
- What impact will my decision have on G+D's business and reputation?
- What if my behaviour was made public or published in the media?
- How would my family and friends judge my behaviour?
- What does my conscience tell me? Am I ready to take personal responsibility for my decision?



CAUTION – WARNING SIGNAL!

A warning signal is raised if we or others try to overcome concerns by means of sentences such as:

- But everybody else does it that way, too.
- The official way would take too long.
- No one will find out.
- We can smooth things out later.



WHERE CAN I GET ADVICE?

Are you unsure in a situation whether an action is lawful or a decision is correct? Or do you have a disturbing feeling that you cannot overcome? Get advice! Your superiors, as well as other managers or colleagues from Legal or Compliance, are there for you.



CONCERNS

WE ADDRESS CONCERNS PROMPTLY AND FULLY.

We believe acting ethically is not only the right thing to do, but that it is also the right way to do business. Identifying and solving problems at an early stage is critical to maintaining the trust of our customers, business partners, employees and stakeholders.

Speaking up

G+D fosters a culture of trust, integrity and compliance and encourages you to address your doubts and concerns about situations or behaviour that are contrary to laws, this Code of Conduct or internal guidelines and could therefore pose a risk to the company and its stakeholders. If you have reason to believe that any G+D employee, or anyone working on behalf of G+D may have engaged in misconduct, we expect you to address your concerns immediately. If you have any doubts about whether a particular situation requires escalation, you should always choose to escalate, seek advice, and report your concerns.

Confidentiality and anonymity

G+D believes it is important that you feel secure when raising a concern. You can also report your concern or questions confidentially and anonymously, if you prefer. Any reported concerns will be examined confidentially and in accordance with the applicable rules, including the rules on the handling of personal data.

No disadvantages

When a concern is examined G+D assures that the rights of all parties involved and related to the matter are respected and observed. Employees who report concerns or indications of possible violations are protected from adverse measures and retaliation.

G+D will take disciplinary action against managers or employees who engage in retaliation against a colleague who has raised concerns or questions or reported a possible violation.



SAY NO!

No one – at any level in or outside of the G+D organisation – has the authority to require you to do something that is illegal, unethical, or in violation of this code of conduct.



WHERE CAN I REPORT CONCERNS OR GET ADVICE?

You can choose from several internal channels to report potential misconduct or potential ethical concerns, or to seek advice:

- Direct manager and other superiors
- Local compliance officer
- Responsible Compliance Office or the Group Compliance Office
- “[G+D Integrity Line](#)”, our worldwide whistleblowing system that also allows anonymous reporting



WHERE CAN I FIND MORE INFORMATION?

You can find more information on the [Contact page](#) of this document.



BASIC WORKING CONDITIONS

WE RESPECT AND CARE FOR EACH OTHER.

G+D is a responsible and reliable employer. We cultivate fairness, and protect the fundamental rights of employees and their representatives. A sense of belonging is created through trust and security. This requires a working environment that is characterised by appreciation and respect.

Appreciation and respect

Appreciation and respect for each employee and their individual living environment are an integral part of our company culture, so that all employees can feel they belong. Across all levels of the company, we treat each other with respect, appreciation and responsiveness. This is a cornerstone of G+D's success as a "great place to work"

Diversity, inclusion, and equal opportunities

We create an inclusive working environment with equal opportunities. For us, equal opportunities and fairness in the workplace mean that every employee – regardless of personal characteristics, individual life realities as well as physical or mental limitations ("participation") – is assessed according to their abilities, qualifications, experience, and performance, and is treated objectively in a fair and equitable manner. The multicultural background and diversity of our employees is one of our strengths.

Participation of employees

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

Occupational health and safety

The health and safety of all employees is a top priority. Therefore, the implementation of occupational health and safety regulations, as well as high technical and operational safety standards, form the basis for our daily work.



WHY IS THIS IMPORTANT FOR US?

- G+D clearly opposes behaviour that is contrary to the above principles.
- This applies to every activity for G+D, both in the workplace, and, for example, during customer visits, conferences, departmental celebrations, and in social media.



WHAT WE DO NOT TOLERATE:

We do not tolerate harassment, discrimination, unequal treatment, or disparagement of any kind, for example on the basis of age, skin colour, gender, sexual orientation, religion, disabilities, or ethnic origin.



WHERE CAN I FIND MORE INFORMATION?

You can find more information about our basic working conditions on our company intranet "Digital Workplace" ("DWP") or from your HR contacts.





HUMAN RIGHTS AND LABOUR STANDARDS

WE RESPECT HUMAN RIGHTS.

Respecting and protecting human rights, and complying with global labour standards, are among our core values. At G+D, we are committed to complying with nationally and internationally applicable human rights and labour laws and standards.

These include the United Nations (UN) Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the International Labour Organization (ILO) Fundamental Principles, and the UK Modern Slavery Act.

We commit ourselves to these, and we expect the same from our business partners. We therefore ensure that the principles of human rights and labour standards are complied with, both in the selection of business partners and in our ongoing business operations.



WHICH AREAS IN PARTICULAR FORM PART OF HUMAN RIGHTS?

- Respect for personal dignity, privacy, and the personal rights of each individual
- Respect for the relevant obligations of occupational health and safety
- The prohibition of child and forced labour
- The prohibition of slavery and human trafficking



WE ABIDE BY THIS!

- We do not tolerate child or forced labour, or any form of modern slavery or trafficked labour. This applies to our own companies, to our contractual partners, and to our supply chains.
- We review decisions that we make for the company at an early stage for possible adverse impacts on the human rights of others.



WHERE CAN I FIND MORE INFORMATION?

You can find more information about human rights and labour standards on the Intranet or from your Compliance or HR contacts.



ANTITRUST AND COMPETITION LAW

WE SUCCEEDED AS FAIR COMPETITORS.

At G+D, we convince our business partners and customers with our products and services in fair and free competition. We therefore comply with all regulations of antitrust and competition law.

Antitrust law protects free and undistorted competition for the benefit of customers, companies, and society.

Central risk areas under antitrust law

- Collusion with our business partners or competitors that could unfairly influence free competition: In particular, agreements on prices, or business conditions, allocating customers, markets or territories, or other restrictions of competition are prohibited.
- Abuse of a market-dominant position (an indicator may be, for example, a market share of more than 30 per cent), for example, by treating customers differently without objective justification (discrimination) or in imposing unreasonable purchase or sales prices and conditions.



THAT IS WHY IT IS IMPORTANT FOR US!

- We always act with the highest integrity, and comply with all fair competition rules.
- Conduct contrary to antitrust law distorts competition and contradicts the fundamentals and objectives of free and fair trade.
- Violations of antitrust law can have serious consequences for our company and for the employees involved: high fines, exclusion from public tenders, damage to G+D's reputation.



IN WHICH SITUATIONS, FOR EXAMPLE, CAN THERE BE RISKS?

- Communication with competitors
- In contracts: in exclusivity agreements or cooperation agreements between companies, for example joint research and development, consortia, bidding consortia, or purchasing cooperation
- Participation in trade fairs and association meetings attended by competitors or business partners



WHERE CAN I FIND MORE INFORMATION?

You can find more information about antitrust and competition law on the Intranet or from your contact person in Legal or Compliance.



ANTI-CORRUPTION

WE ACT WITH THE HIGHEST INTEGRITY AND REJECT ANY FORM OF BRIBERY.

In all areas of business, we firmly reject any form of corrupt behaviour. This also includes any unlawful influence on decisions and processes in business transactions.

We refrain from business opportunities that may give the impression of corruption – even if this may result in a loss of business. The fact that such business may be won and taken over by a competitor is no excuse for breaking the law. We also expect such a clear attitude from our business partners. That is why we enter into relationships only with business partners who demonstrate and promote integrity. We do not engage business partners or third parties to carry out acts that are prohibited at G+D.

Corruption risks may arise in various situations when a person offers any undue advantage in order to influence the decision of another person, or when a person demands any undue advantage in order to make a certain decision. Examples include unusually high commission demands from business partners, as well as expensive gifts and invitations. G+D does not allow illegal facilitation payments, i.e. payments to public officials to expedite official acts.

Sponsorship and donations

Even sponsorship and charitable donations can be problematic if at the same time unfair purposes are pursued.

Lobbying

When representing G+D interests at political level (lobbying), we act transparently and in accordance with the legal framework. We do not exert any financial influence on political decisions.



WHY IS THIS IMPORTANT TO US?

- Corrupt behaviour contradicts the foundations and objectives of free and fair trade, slows economic development, distorts competition, and undermines political institutions.
- Corruption can be a criminal offence and lead to severe penalties and fines for G+D and also for those involved personally.
- We want to protect the reputation of G+D and our business partners.



THIS IS HOW I BEHAVE CORRECTLY IF THERE ARE ANY SUSPICIONS OF CORRUPT BEHAVIOUR:

I ask myself:

- Do I feel a concern?
- What would my superiors say about this if they found out later?
- What impression would my friends and family have of it?
- Would it reflect badly on G+D if the facts were shown in the media or revealed during an audit?



WHERE CAN I FIND MORE INFORMATION?

You can find more information about corruption and bribery on the Intranet or from your Compliance contacts.





CONFLICTS OF INTEREST

WE MAKE BUSINESS DECISIONS ONLY IN THE BEST INTEREST OF G+D.

We deliver the best results for G+D when we work together for a common purpose and make unbiased business decisions. A conflict of interest may arise when your personal interests diverge from those of G+D and may result in you making biased decisions and taking commercially irresponsible action.

Conflict of interests situations are not a problem in themselves, provided they are identified, reported and managed appropriately to ensure proper business conduct. If they are not handled in this way, however, such situations can lead to inappropriate decision-making, or even to the commission of criminal offenses (e.g. corruption, fraud or insider trading)

To prevent conflicts of interest:

- Act transparently in everything you do.
- Do not use your position at G+D to derive benefits that are not available to others.
- Be aware of personal activities, interests, or relationships that could interfere, or even appear to interfere, with your objective decision making.
- Disclose such potential conflicts to your line manager,
- Ask for guidance if you are unsure whether a conflict of interest, or the appearance of one, exists.



WHAT SITUATIONS, FOR EXAMPLE, CAN LEAD TO CONFLICTS OF INTEREST?

- Engaging in an activity that competes with G+D (e.g. participating in a competitor's initiative)
- Hiring a person (as employee or consultant) with whom you have a personal relationship.
- Arranging the purchase of goods or services from a company in which a family member of you decides about the transaction



RECOGNISING A POTENTIAL CONFLICT OF INTEREST:

- Is my decision based on purely objective criteria, such as qualification, price, quality, and reliability?
- Could the impression arise that I personally or my immediate environment benefit from a decision?



WHERE CAN I FIND MORE INFORMATION?

You can find more information about the topic of conflicts of interest on the Intranet or from the responsible Compliance Office.



TAX AND CUSTOMS REGULATIONS

WE COMPLY WITH APPLICABLE TAX AND CUSTOMS LAW AND REJECT AGGRESSIVE TAX STRUCTURING MODELS.

As a responsible taxpayer for our global corporate activities, we always observe all relevant tax and customs legislation worldwide and fulfil the associated declaration and reporting obligations carefully and punctually.

We refrain from using aggressive tax structuring models whose sole purpose is to obtain tax advantages not permitted by law.

It is not only the responsibility of the tax department, but of each and every one of us to contribute to compliance with tax and customs regulations within our own area of responsibility. As part of our business activities, we work together to ensure that all transactions are accurately reflected in terms of tax and customs law.



WHY IS TAX AND CUSTOMS COMPLIANCE SO IMPORTANT?

Correct and timely declaration of the taxes and customs duties to be paid is fundamental for us, as violations of legal and official requirements can result in serious monetary and non-monetary sanctions, as well as reputational damage and financial disadvantages for the company. Moreover, an aggressive tax policy does not meet our aspirations for a sustainable corporate policy.



EXAMPLES OF SITUATIONS IN WHICH TAX REQUIREMENTS MUST BE OBSERVED:

- Donation of gifts, invitations to events.
- Negotiating and concluding contracts with customers and suppliers.
- Designing and changing business models or value chains.
- Activities of employees abroad.



WHERE CAN I FIND MORE INFORMATION?

You can find more information about this on the Intranet, as well as from the responsible contact persons from the Corporate Tax Department and the business divisions.



HUMAN RIGHTS AND
LABOUR STANDARDS

ANTITRUST AND
COMPETITION LAW

ANTI-CORRUPTION

CONFLICTS
OF INTEREST

**TAX AND CUSTOMS
REGULATIONS**





ACCOUNTING AND BUSINESS DOCUMENTATION

WE CREATE TRANSPARENCY THROUGH CORRECT ACCOUNTING AND PROPER DOCUMENTATION OF BUSINESS TRANSACTIONS.

We always comply with national and international requirements for proper accounting. We create transparency through proper documentation. Through our internal control systems and associated documentation, we ensure that we comply with all necessary legal requirements.

Each of us – at every level of the company – is required to take the utmost care to ensure the accuracy and completeness of all company business and financial records – whether business decisions on major investments, expense reports, or simple e-mails. For complete documentation, we take care to comply with all internal processes, guidelines, and generally accepted accounting principles.



WHY ARE CORRECT ACCOUNTING AND PROPER DOCUMENTATION SO IMPORTANT?

Correct accounting and proper documentation are not only a legal obligation, but also create transparency and trust in G+D among our business partners and the public.



THIS IS HOW EACH OF US CAN CONTRIBUTE:

- Correct, complete, and prompt documentation of the business transaction
- Compliance with retention periods
- No falsification of records



WHERE CAN I FIND MORE INFORMATION?

You can find more information about this on the Intranet or directly from your superiors and, if applicable, from the contact persons from the Accounting department.



PRODUCT PORTFOLIO

WE ENGINEER SECURITY TECHNOLOGY THAT CREATES TRUST.

We develop security technology that builds trust, in order to secure the world's essential assets in four main areas: Payment, Connectivity, Identities and Digital Infrastructures. In the coming decade, we will help shape trust in a digital world – doing what we have always done:

Creating confidence

This is the guiding principle of our daily business conduct and our promise to our customers. The satisfaction of our customers is the benchmark for our services. We meet their requirements with high-quality products, intelligent solutions, speed, and reliability. Through our expertise and service, we support our clients to help them achieve sustainable success in their markets.

Technology leadership and innovation

The past and future of G+D are characterised by progress and the continuous development of the G+D portfolio in the interests of our customers. Safety and trust through innovative products and solutions are essential components of our financial success. New technologies have always been the driver and foundation for this, and the spirit of innovation is one of our core values. We want to strengthen the business with our core competencies, and at the same time be flexible enough to transfer them to new business areas.



WHAT DOES THAT MEAN FOR US?

- Each person employed strives daily to achieve the highest level of quality and to continuously improve the processes and procedures required to achieve this.
- G+D continuously invests in research and development to maintain and extend our leading market position.

This is the basis for the trust of our customers and at the same time a contribution to the future of G+D.



WE ABIDE BY THIS!

- In our area of responsibility, we ensure that our products, services and solutions are safe and comply with the local legal requirements for safety, certification, distribution and use in the respective target countries.
- If we become aware of indications of defects in terms of quality, safety, or other conformity requirements, we investigate and report them.
- We keep our technical promises.



WHERE CAN I FIND MORE INFORMATION?

You can find more information about this on the Intranet.



TAX AND CUSTOMS
REGULATIONS

ACCOUNTING AND BUSINESS
DOCUMENTATION

PRODUCT PORTFOLIO

DATA PROTECTION AND
DIGITAL RESPONSIBILITY

INFORMATION SECURITY





DATA PROTECTION AND DIGITAL RESPONSIBILITY

WE PROTECT PERSONAL DATA AND SHAPE TRUST IN A DIGITAL WORLD.

Whether for smartphones, mobile payments, digital currencies, automated border controls, or citizen IDs, digitisation creates a wide range of opportunities for our company. To benefit from this, however, one thing is required: Trust in our company in the digital world.

We create this trust through responsible, transparent, and fair handling of data, digital technologies and applications.

We respect the protection of personal data and of privacy as a human right, and we comply with applicable data protection laws.

We act in a digitally responsible manner that is compliant with data protection when, for example, we:

- Process personal data of both employees and those entrusted to us by customers or suppliers in a careful, compliant, and secure manner.
- Consider data protection as early as the product development stage by fulfilling the requirements of "Privacy by Design and Privacy by Default".
- Maintain transparency towards all data subjects about the processing of their data.
- Respect the rights of data subjects, and implement them accordingly.
- Store only necessary personal data and files, and delete unnecessary files.
- Responsibly design and use new technologies, such as artificial intelligence and biometrics.

! THAT IS WHY IT IS IMPORTANT TO US!

- For G+D, the processing and protection of personal data is a core competence. The responsible handling of data is therefore one of our core values and an essential business fundamental for the trust of our customers.
- Violations of data protection laws can result in heavy fines and serious reputational damage.

? WHAT ARE EXAMPLES OF PERSONAL DATA?

- General personal data (name, date of birth, e-mail address, telephone number, etc.)
- Personalisation data (cardholder, card number, etc.)
- Payment data (IBAN, PAN, payment data, etc.)
- Telecommunications data (telephone number (MSISDN), device data (eID/eUICCID), etc.)
- Online data (IP address, location data)

>> WHERE CAN I FIND MORE INFORMATION?

You can find more information about data protection on the Intranet or from your Data Privacy contacts.





INFORMATION SECURITY

WE PROTECT CONFIDENTIAL INFORMATION, TRADE SECRETS, AND INTELLECTUAL PROPERTY.

The protection of confidential information, in particular business and trade secrets, and of intellectual property is one of our key tasks in order to secure the basis for our success. Availability, confidentiality, and integrity of information, systems, and data are of fundamental importance. Within the framework of identity and access management, we carefully ensure that only the appropriate people and roles can access the data they need for their work (need-to-know principle). We consistently use modern procedures for the secure authentication of identities and the encryption of data.

In order to remain successful in the long term, we comply with all relevant laws and regulations relating to information protection and cyber security. We have established a security management system that implements control measures from all relevant areas.

Insider information

If we have access to insider information relating to a listed company (e.g. secunet Security Networks AG) in which a shareholding exists, is planned, or is to be may be given up, we must not use it to acquire or dispose of securities in that company or to make investment recommendations to persons outside the G+D Group (including family members or friends).

In addition, disclosure of such information is permitted within the group only under strict conditions.



WHY IS THIS IMPORTANT?

- Information protection is essential for developing and producing secure digital and physical services and products, and for protecting our data and that of our customers, partners, and suppliers.
- The unauthorised disclosure of confidential information can result in very high damages for G+D and can have legal consequences for the employees concerned.



THIS IS HOW WE CAN PROTECT CONFIDENTIAL INFORMATION!

- We do not share confidential information outside G+D without authorisation.
- We actively inform ourselves about the security requirements for handling IT systems and data and consistently comply with them.
- We actively involve colleagues from the global security community in new business projects.
- If we are not sure whether we are allowed to share information, we ask our superiors or use the globally available information services of the Cyber Defense Center.



WHERE CAN I FIND MORE INFORMATION?

You can find more information about protecting confidential information on the Intranet or from your Corporate Security or Legal contacts.





EXTERNAL COMMUNICATION

WE COMMUNICATE IN A CONSISTENT AND COORDINATED MANNER WITH EXTERNAL PARTIES.

In order for us at G+D to be perceived by the public as a professional and trustworthy company, a conscientious approach to external communication is necessary.

In communication on all channels, we want to convey a consistent and coordinated presence to the outside world.

We adhere to the principles of confidentiality as outlined in the Information Security chapter.

In every type of external communication in which we are to be recognized as G+D employees we are aware that we also always represent G+D. We interact sensitively and objectively, adhere to the G+D netiquette and mark personal views as such.

Social media

We also adhere to the principles for external communication when making statements in social media.



IN WHICH AREAS SHOULD WE PAY ATTENTION TO EXTERNAL REPRESENTATION?

Especially in press releases or other publications or during lectures and interviews that we may give. In addition, also in our internal communication channels such as the DWP or Yammer.



WE SHOULD PAY ATTENTION TO THIS IN OUR EXTERNAL REPRESENTATION:

External publications and appearances must be coordinated with Corporate Communications, and Corporate Design must be observed.



WHERE CAN I FIND MORE INFORMATION?

You can find more information about protecting confidential information on the Intranet or from your Corporate Brand Communications contacts.



COMPANY PROPERTY

WE HANDLE WORK EQUIPMENT WITH CARE.

From valuable machinery to production materials, office equipment, and from computers to vehicles, there are numerous assets that we need for our work. All work equipment, devices, and company facilities provided by G+D are the property of G+D, and may generally be used only for business purposes and only in accordance with our company guidelines. We treat company property responsibly, and protect it from loss, theft, damage, and misuse. The same applies, of course, to the handling of the property of our customers, business partners, and third parties. The private use of company property is permitted only if this is regulated in company guidelines.

We may use company internet access for private purposes – including external social media – but only within the framework of company policies and the principles outlined in this code of conduct. We do not use company devices and company internet access for illegal downloads, recordings, or copies.

The private use of G+D e-mail accounts is generally prohibited. Business content must not be sent via private accounts.

The same standards apply to mobile working.



WHAT WE PAY ATTENTION TO:

We treat company property with care and do not damage it.

When we use the company internet for private purposes, we take care to protect the IT systems against viruses, Trojan and similar threats. For that reason, we do not download any programmes from the internet, and do not upload or download file attachments via web mailers.



HOW DO I HANDLE PRIVATE E-MAILS?

- For private purposes: always use a private e-mail address
- Private e-mails coming into a G+D e-mail account: delete after reading.
- Personal but business-related e-mails: if stored in the company e-mail account, file them in a folder designated as “personal”, or delete them. (This includes, for example, communication with the works council, company doctor, data protection, compliance office, trade union, etc.)



WHERE CAN I FIND MORE INFORMATION?

You can find more information about corporate ownership on the Intranet, or from your Legal or Compliance contacts.



INTERNATIONAL BUSINESS RELATIONS

WE DO BUSINESS ACROSS COUNTRY BORDERS, BUT ALWAYS WITHIN THE LEGAL BOUNDARIES.

As an international company, business relations in almost all parts of the world are part of our daily operations.

Foreign trade law, export control and regional risks

Sustainable business success across national borders requires compliance with international trade regulations, export law requirements, sanctions, and embargoes. It is also characterised by the assumption of social responsibility, which is why we keep a responsible eye on the political situation on the ground. We deliberately refrain from business relationships that do not comply with legal requirements or our own standards.

Contact with governments, institutions close to governments, authorities, and officials

Regular contact with governments, institutions close to governments, authorities, and officials is an important part of our international relations. In this context, a transparent and responsible approach is essential. For this reason, we avoid any appearance of unfair or illegitimate behaviour, in particular the acceptance and granting of benefits or other advantages, and comply with all applicable regulations and internal guidelines.



WHY IS THIS IMPORTANT TO US?

- Violations of foreign trade law can trigger heavy fines and lead to exclusion from markets or public contracts.
- The unlawful granting of advantages to persons employed in authorities or ministries is punishable worldwide as bribery of public officials.
- G+D strongly opposes corruption in all its forms.



ASK YOURSELF!

- Have I clarified whether there are export restrictions for the product, the country of destination, the customer, or the intended use?
- Have I made sure that, for example, a planned guest gift, invitation, or delegation trip for clients in public office complies with the G+D guidelines?



WHERE CAN I FIND MORE INFORMATION?

You can find more information about the topic of international business relations on the Intranet or from the responsible contact persons in the Export Control and Compliance departments.





MONEY-LAUNDERING PREVENTION

WE GIVE MONEY-LAUNDERING NO CHANCE.

Supply and trade transactions carry the risk of being misused for money-laundering or financing terrorism.

Any involvement in money-laundering and financing terrorism – whether knowingly or unknowingly – is illegal and punishable as a criminal offence.

In order to prevent our company from being misused as a vehicle for money-laundering, we conduct business activities only with reputable partners who comply with applicable law and obtain their resources from legitimate sources.

We thoroughly verify the identity of potential customers, business partners, and other third parties, and comply with national and international sanctions and embargo regulations as well as other restrictions under foreign trade law.



WHAT IS MONEY-LAUNDERING?

Money-laundering occurs when the origin of cash or assets arising from criminal activities (such as corruption, tax evasion or illegal arms or drug trafficking) is concealed by channelling it into the regular financial and business cycle.



THE FOLLOWING INDICATIONS CAN BE WARNING SIGNALS:

- Transfer payments to and from companies, as well as to or from countries unrelated to the business
- Conducting a transaction in a way that bypasses the usual process
- Irregular payment transactions



WHERE CAN I FIND MORE INFORMATION?

You can find more information about money-laundering on the Intranet or from your money-laundering officer.

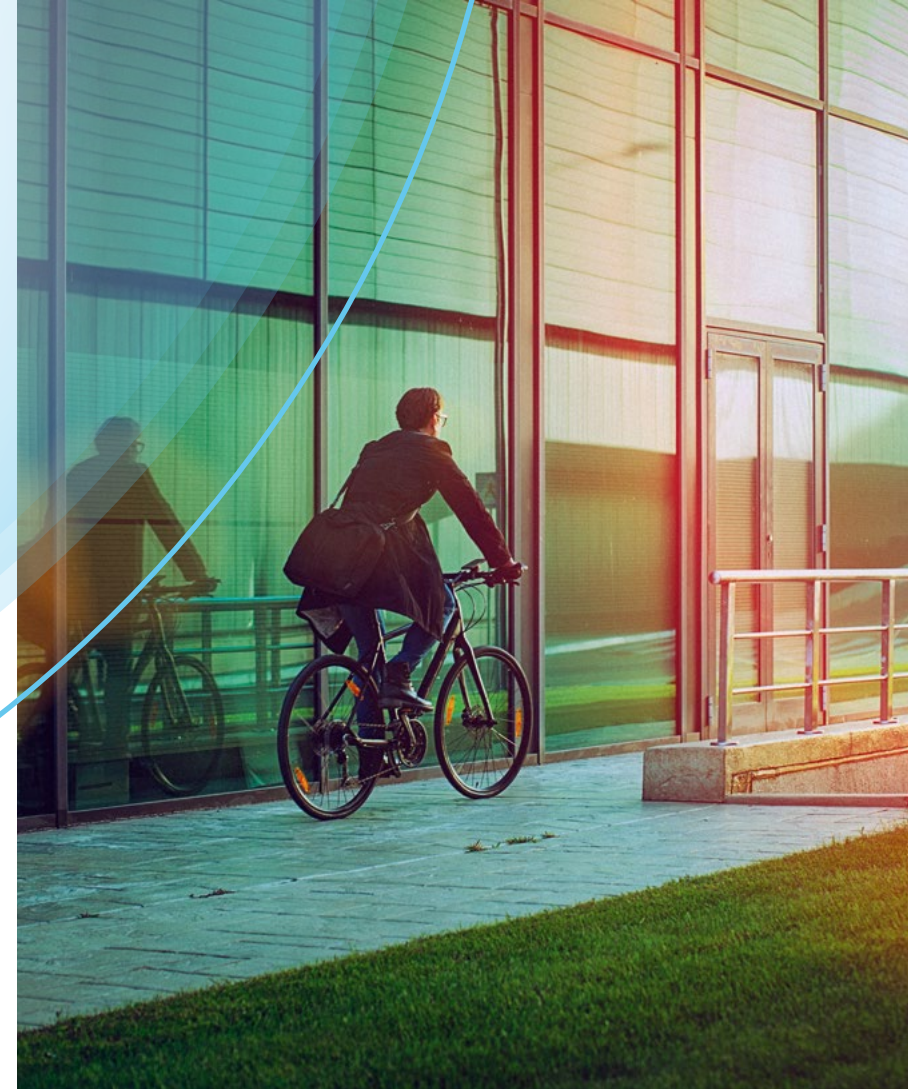


ENVIRONMENT AND SOCIETY

WE ACTIVELY CONTRIBUTE TO THE PRESERVATION OF A WORLD WORTH LIVING IN

As a future-oriented family business, we are convinced that sustainable behaviour creates value for both the company and society. As a signatory to the UN Global Compact since 2010, we stand by its principles, and support the 17 UN Sustainable Development Goals. Sustainability is established as a building block of equal footing in the development of our corporate strategy. This is how we intend to secure the company's existence for future generations.

We accept our responsibility towards the environment and – as a leading sustainability company in our market segments – actively contribute to the preservation of a future worth living. To this end, we are reducing our ecological footprint in our own production, by means of our infrastructure and also through the logistics chain. We are focusing on sustainable technologies and transforming our product portfolio towards green products and solutions.



HOW DO WE ENSURE THAT WE ACHIEVE OUR ENVIRONMENTAL PROTECTION GOALS?

We define ambitious environmental goals, which we back up with concrete measures. Together with our employees, we develop ideas that support the implementation of our environmental goals and, for example, we minimize the use of resources, reduce greenhouse gas emissions throughout the value chain or implement recycling processes.

In order to avoid greenhouse gas emissions, we use, for example, energy from renewable sources, some of which we also generate ourselves. We measure, document and report our environmental progress on the basis of a key performance indicator system. In this way, we create transparency and an important basis for achieving our climate and environmental goals. Our social and governance stance, as part of our sustainability strategy, is described in the respective sections.



EACH OF US CAN MAKE OUR CONTRIBUTION!

We can all do our bit to protect the environment by taking environmental considerations into account in all our decisions, and by avoiding wasting resources.



WHERE CAN I FIND MORE INFORMATION?

You can find more information about sustainability on the Intranet or from your Sustainability contact.



WE ARE HERE TO HELP! CONTACT US.

RESPONSIBILITY FOR THE CODE OF CONDUCT

The code of conduct is prepared and updated under the direction of the Group Chief Legal & Compliance Officer. Employees and managers from various regions of the world and from all business sectors and functions of the company have contributed to this.

The Board of Managing Directors of Giesecke+Devrient GmbH is responsible for approving and issuing this Code of Conduct.

CONTACT

[Contact persons](#)

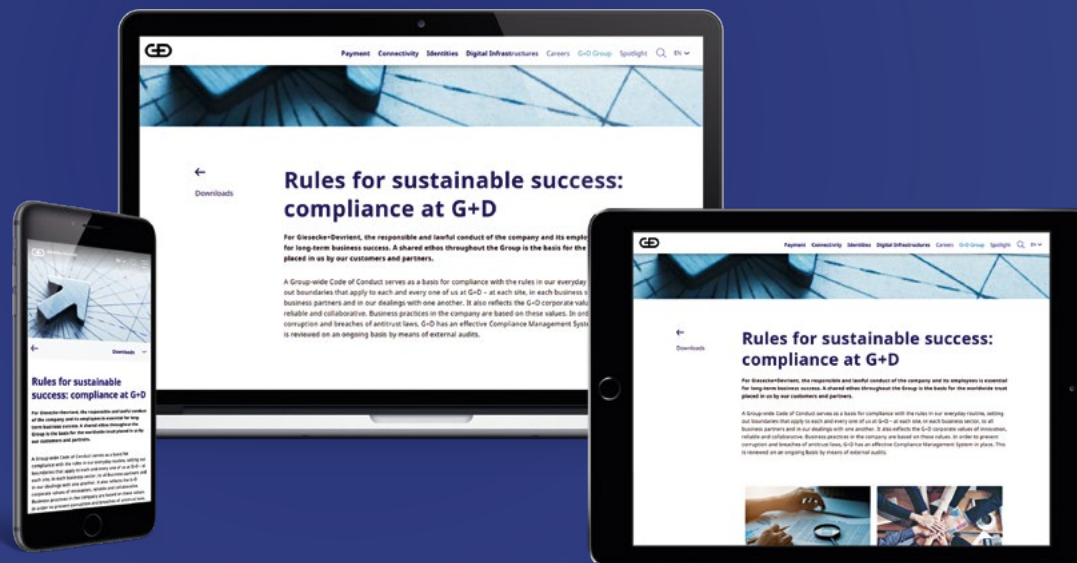
[Compliance Intranet](#)

[Compliance Website](#)

[G+D Integrity Line](#)



FIND OUT MORE:



More information can be found online.
Visit now to find further information and links.

For Employees:



[dwp.gi-de.com/sites/
dwp-compliance/en-US/
Pages/overview.aspx](http://dwp.gi-de.com/sites/dwp-compliance/en-US/Pages/overview.aspx)

For external users:



[www.gi-de.com/en/
group/responsibility/
compliance](http://www.gi-de.com/en/group/responsibility/compliance)

