Acting Responsibly
Code of Conduct
Introduction

As a global corporation, Giesecke+Devrient (G+D) believes that responsible, lawful behavior is a basic requirement for business success. It forms the foundation for the trust placed in us by our customers, business partners, the company’s owners, and society as a whole.

The principles and rules laid down in this Code of Conduct define the action framework for responsible behavior at G+D. The Code of Conduct is the equivalent of a G+D constitution for all the company’s employees. It applies at every location, in every business unit, and in our day-to-day dealings with all business partners and with each other. In conjunction with our corporate values, mission, and vision, it encapsulates the Group’s ethos and standards. Each of us is responsible for ensuring that the Code of Conduct is not just a piece of paper but something we live up to and implement throughout our organization on a daily basis. G+D’s success and reputation are highly dependent on complying with – and being seen to comply with – these principles and rules.

We are aware that managers have a duty to act as role models in this regard.

The Management Board of the Giesecke+Devrient Group

Code of Conduct

1. Principles
2. Commitment to Customers
3. Commitment to Shareholders
4. Commitment to Employees
5. Commitment to Suppliers and Business Partners
6. Assets and Information
7. Business Integrity
8. Compliance and Implementation
9. Worldwide Application
1. Principles

Our standards of conduct are derived from our corporate values: reliable, collaborative, and innovative. As the foundation of G+D’s corporate culture, these values shape our work and govern our day-to-day dealings with one another.

We have underlined our commitment to these values by participating in the UN Global Compact. The UN Global Compact’s ten principles advocate responsibility in the areas of human rights, labor standards, environmental protection, and anti-corruption. As a company, we are committed to implementing these principles in practice.

1.1 Human Rights

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

1.2 Obedience to the Law

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

1.3 Child or Forced Labor / Working Conditions

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

1.4 Data and Privacy Protection

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

1.5 Environmental Protection and Product Safety

A responsible attitude towards the environment is a key factor in the lasting success of our company. We therefore make sparing use of natural resources and aim to limit the impact of our activities and products on the environment. We generate safe and environmentally compatible products and use safe, eco-friendly manufacturing methods. Indeed, environmentally sound design, technical safety, and health protection are key parameters right from the start of our development stages. Our long-term objective is to embed sustainability throughout our entire value chain.
1.6 Responsibility to Society

Our products and services contribute to the social progress and technological advancement of society. As a company, we are very much aware of our corporate social responsibility. We therefore seek to reconcile the commercial, social, and environmental impact of our work over the long term. Doing business in a sustainable and responsible way is part of our corporate philosophy and fundamental to our value framework.

We support donations to worthy public and social causes. Under the umbrella of the not-for-profit Giesecke+Devrient Foundation, we have brought together our corporate citizenship activities involving education, culture, and intercultural exchange.

1.7 Technology Leadership and Innovation

Through ongoing investment in research and development, we strive to maintain and expand our leading position in the fields in which we operate. We aim to boost the business activities surrounding our core competencies, while at the same time remaining flexible enough to transfer these skills to new areas. We are committed to the ongoing globalization of the G+D Group. This includes consolidating our position in existing markets and tapping into new ones.

2. Commitment to Customers

Our vision is to be the global leading provider of security technologies, both in the digital and physical world. We are a technology leader, trusted partner, and preferred provider of products, services, and solutions in all our markets. In addition to our innovative ability and global presence, trust is the basis of our commercial success. Our “Creating Confidence.” claim is the guiding principle behind our daily operations and our promise to our customers. We measure our performance in terms of the satisfaction of our customers, meeting their requirements with high-quality products, intelligent solutions, responsiveness, and total reliability. Our service commitment and expertise help our customers to achieve sustainable success in their markets. Every employee endeavors on a daily basis to deliver the highest level of quality and to continually improve the processes and procedures required to perform to such standards. This represents both the basis for the trust placed in us by our customers and a contribution to the future of G+D.
3. Commitment to Shareholders

As a family-owned company, the visible orientation of our activities around the principle of sustainability is a pillar of our long-term success and a key competitive advantage. Sustainability helps engender trust among our employees and business partners. Commercial success is a fundamental prerequisite for the company’s long-term survival, safeguarding the interests of our owners, employees, customers, and suppliers alike. An important measure of our success is an appropriate return on capital employed. To protect both G+D and our shareholders, we operate a systematic, strategic, and operational risk management system. The Corporate Auditing department assesses and evaluates the effectiveness of the associated control and monitoring processes.

4. Commitment to Employees

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

We aim to be a responsible and reliable employer at both national and international level. For this reason, furthering the dedication and satisfaction of our employees has top priority for us.

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

Our HR strategy focuses on three key elements: systematically increasing the quality of our management culture, advancing professional development, and fostering the diversity of our employees.
4.1 Right to Organize

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

4.2 Health and Safety

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

4.3 Fair and Equal Treatment

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

5. Commitment to Suppliers and Business Partners

We treat every business partner with integrity and fairness. The selection of suppliers and business partners follows a defined procedure based on transparent and objective criteria. These include factors related to sustainability and responsible business operations. If a supplier or business partner possesses and implements a similar code of conduct, this fact is taken into consideration alongside other criteria during the selection process. We include our suppliers in the ongoing process of enhancing our value creation. We seek to build long-term relationships with our suppliers and business partners based on mutual trust.
6. Assets and Information

6.1 Use and Protection of Assets

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

6.2 Security and Confidential Information

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

6.3 Insider Trading

Individuals who possess inside information related to a company listed on the stock market (e.g. secunet Security Networks AG) in which G+D holds a stake or plans to acquire or dispose of a holding are prohibited from trading in (buying or selling) listed or over-the-counter securities of such companies. Inside information is any information not available to the public that is likely to influence an investor’s decision to buy, sell, or hold a security. Inside information may not be disseminated to persons outside the G+D Group (including friends and relatives) or used to provide investment recommendations without prior authorization. Dissemination within the G+D Group is only permitted if the recipient has a demonstrable need to know the information for the performance of their duties.
7. Business Integrity

7.1 Compliance with Laws

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

7.2 Fair Competition

We are committed to the principles of the market economy and fair competition. Competitors are not treated in a manner that may be considered unfair or, in particular, deemed illegal. We do not knowingly make false or ambiguous statements about our competitors, and neither do we publicly criticize them. We also refrain from commenting on or disseminating negative reports about competitors.

7.3 Separation of Personal and Company Interests

It is our strict policy not to accept gifts or invitations from customers, suppliers, or competitors. Accepting monetary gifts or benefits in kind is not permitted. Exceptions are permissible in individual cases, provided the gift does not exceed customary limits and the possibility can also be excluded that accepting the gift will influence business decisions or create the impression that such decisions are being influenced.
For our part, we will only give such gifts or benefits to business associates, partners, and so on that we are allowed to receive from them in accordance with these principles. Giving monetary gifts or benefits in kind is not permitted. We exercise particular restraint in dealings with civil servants, government employees, officials, and/or other persons within or close to governments or their administrations to avoid any impression that we intend to exert improper influence on official decisions by giving or accepting gifts or other benefits.

G+D employees may not use their signatures to authorize transactions for their own benefit. We will also ensure that there are no conflicts of interest in the procurement process. Purchasing staff must pay particular attention to maintaining their personal integrity and remaining impartial and independent. They must refrain from actions that give even the slightest impression to the contrary. Purchasing staff may not enter into business relations with themselves or their relatives on behalf of G+D.

7.4 Relationships with Third Parties

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

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

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

A corporate guideline on donations and sponsorship ensures that a uniform approach is adopted with regard to making donations and engaging in sponsorship activities, while maintaining compliance with key principles and transparency throughout the company in this area.
8. Compliance and Implementation

Every G+D employee must adhere to this Code of Conduct while performing their duties. Compliance violations and breaches of the law are not tolerated and will be penalized (zero-tolerance policy). The Compliance Office operates a global electronic training program to communicate the content of the Code of Conduct. If an employee is unsure of the meaning of any of the principles, they are required to obtain advice from their superior, the compliance helpline, or regional compliance officers. The Corporate Auditing department assesses compliance with the Code of Conduct as part of its audits.

9. Worldwide Application

The Code of Conduct applies to the entire G+D Group. Where G+D GmbH has a stake in associated companies alongside other shareholders, the Code of Conduct is also applicable when it has been approved by the relevant bodies within the associated company. Such agreement is not required where adoption of the Code of Conduct has already been agreed as part of the shareholder agreement, for example. Where additional behavioral guidelines are laid down in the G+D corporate guidelines or the separate policies of individual units, divisions, or subsidiaries, they may not conflict with this Code of Conduct.