

IDnow.

Code of Conduct

Version 1.5

INTERNAL

Code of Conduct

Preamble

At IDnow, innovation means more than just creating something new or novel. We innovate for a reason – to help create a better world. Being attentive to what seems impossible today, but could be solved in the future, is at the heart of what we do and in the choices we make.

As a leading identity verification platform provider in Europe, IDnow aims to make the connected world a safer place. We strive not only to design our products and services in line with this objective, but also to create an environment characterised by openness and respect. Values such as personal responsibility, transparency and good conduct, which complies with the law and is both ethically and morally correct at all times, play an utmost important role in this. Cooperative and respectful interaction, as well as the conscious perception of our economic, social and ecological responsibilities, form the basis for long-term and sustainable corporate success.

IDnow is also aware of its corporate responsibility and advocates for an ecological and socially sustainable development. Climate change and its mitigation are crucial to everyone, but our ambitions are not limited to just environmental aspects. As an IT service provider, we are concerned about our positive impact on our environment, our suppliers and partners. Good governance will ensure our integrity in a digital world that takes compliance issues into account.

This Code of Conduct governs our daily interaction with our colleagues, business partners, customers, users and the public. It is a guideline that promotes correct and responsible behavior and lays out both our fundamental rules and principles. It applies to every employee of IDnow GmbH and its subsidiaries (all together “IDnow”) and is supplemented by internal guidelines and policies as well as contractual provisions e.g. in our employment contracts.

Noncompliance with the Code of Conduct can result in serious damage, not only to IDnow, but also to us as employees, our colleagues, business partners, customers, users and the public. Therefore, we do not tolerate violations of the Code of Conduct. We will take any necessary action in case of a breach, including disciplinary action in accordance with the internal company rules and regulations. Depending on the seriousness of the violation, this can range from action under employment law to claims for damages under civil law, and may even extend to penalties under criminal law.

Therefore we encourage everyone to familiarize with this Code of Conduct, to integrate it into our own behavior and to bear these guidelines in mind whenever taking actions or when making decisions.

Economic responsibility and ethical business conduct

Compliance with law and order

A fundamental principle of our actions is the observance of and compliance with applicable laws, regulations and good practices related to our business and our activities, at national and international level.

We regularly review our behavior and the behavior of our business partners, identify risks in our supply chains, initiate measures and adapt our guidelines according to current requirements.

We expect our business partners to commit to social and environmental responsibility and to compliance with our agreed contracts and country-specific laws and regulations. We also make the Code of Conduct the subject matter of the contract with subcontractors whenever possible.

Data protection and information security

The protection of personal data and information is of particular importance to us: absolute professionalism is required when dealing with personal data from the users of our products, as well as our customers, partners and employees. Therefore, all personal data is processed by us with the utmost care, strictest confidentiality and in compliance with all applicable laws and regulations, as well as with the use of appropriate IT security standards and tools in accordance with the methods and techniques validated by IDnow. All employees who handle personal data are regularly trained and receive advice and support from the Legal Department, as well as the Data Protection Officers.

Confidential company information

We attach great importance to the careful handling of confidential information, business documents and expertise by ourselves, our customers, partners and suppliers. We take all necessary steps to protect this in an appropriate manner and use such information exclusively for the intended business purposes. Any disclosure of information to unauthorised third parties is prohibited in our employment-, partner- and customer contracts, as well as in agreements with external service providers. Insider trading is prohibited and will not be tolerated.

Also any disclosure of information obtained or generated in the course of the service even anonymized and decontextualized is not permitted to unauthorized third parties.

Fair and free competition

We are committed to fair competition and condemn any actions that impair it. We comply with all applicable competition and antitrust laws. Bribes, kickbacks or other forms of improper payment or benefits may neither be offered nor granted by employees, subcontractors or agents when in contact with customers, public officials or other third parties.

Benefits in the form of gifts, hospitality or invitations are not deemed to be objectionable, only as long as they remain insignificant in scope and nature, serve a legitimate business purpose and do not violate either internal or statutory regulations.

We do not make or tolerate any agreements that violate competition and antitrust law.

Prevention of money laundering

We ensure that the applicable legal provisions against money laundering and the financing of terrorism are complied with. All employees who handle sensitive data are regularly trained and receive advice and support from the Legal Department. Every employee is encouraged to report unusual or suspicious transactions and events to the Legal Department.

Export control

We ensure compliance with all export control regulations for the import and export of goods, technologies and software as well as services and information, as far as applicable.

Avoiding conflicts of interest

We apply to the highest ethical standards and comply with laws and regulations, in particular when working with public bodies, public officials and international authorities.

We make business decisions solely in the best interests of the company and based on objective criteria. Financial or personal interests, or relationships maintained by our employees, their family members, related parties or organisations should not influence this. Employees who are affected by a potential (or actual) conflict of interest - also and in particular in connection with secondary employment, consulting or equity investments - are obligated to inform their supervisor or the management accordingly.

Fair advertising

We are committed that information or advertising that we provide publicly is neither false nor misleading.

Provision of our Services

We are committed to providing our services in compliance with the national laws and regulations in force and with the good practices relating to our activities.

The provision of services shall be with loyalty, discretion and in an impartial manner. It will not privilege any person based on ethnicity, gender, health or any other condition. We aim to provide our services in good faith and with respect for the users, the customer, its staff and its infrastructure.

We only use validated and approved methods, tools and techniques in particular when providing our services. Also any disclosure of information obtained or generated in the course of the service even anonymized and decontextualized is not permitted to unauthorized third parties.

Our employees are encouraged to report any illegal content discovered during and in connection with the service provision.

Intellectual property and Licenses

We respect the intellectual property of business partners, competitors and other third parties. We recognize the technical know-how, patents, trade and business secrets of our customers, partners, service providers and other third parties. We handle this information with great care and do not pass it on or use it without authorisation.

We ensure that all tools used by IDnow are fully licensed and are used in accordance to the license conditions.

Accounting and financial reporting

Transparency and diligence are our top priorities. Our business transactions and records are accurate and properly maintained; accounting and financial reporting comply with the statutory provisions for proper accounting and financial reporting.

Social responsibility

Human rights

Respect for internationally recognised human rights is the basis of all our business relationships. Any form of forced labour, child labour or corporal punishment will not be tolerated.

Employees' rights

It is a matter of course for us to comply with all statutory regulations, in order to ensure fair working conditions – including fair pay and fair working hours. We respect the fundamental right of employees to form (and join) trade unions and employee representative bodies; remuneration and working hours always comply with (or exceed) applicable national and local legal standards.

We ensure that our employees are adequately remunerated, always in line with or exceeding the national and local legal standards on the minimum wages applicable.

Employees' working hours comply with all applicable national or international laws or, in the absence of laws, with relevant industry standards.

Equal treatment and non-discrimination

The working environment is one characterised by open and respectful interaction.

Every individual has the right to be treated fairly, with dignity and respect – any form of harassment, bullying or intimidation will not be tolerated. No employee, customer, user, applicant or other person shall be discriminated against or placed at a disadvantage on the basis of, for example, their gender, sexual orientation, ancestry, language, origin, age, physical or mental limitation, faith, religious affiliation or political beliefs.

Any form of discrimination is prohibited and we take firm action against violations.

Occupational safety and health protection

Safety at work and working conditions that promote good health are of significant importance to us. Compliance with national labour, health and fire protection laws is ensured at all times and is continuously adapted to current regulations.

We are constantly working to improve and develop working conditions.

Ecological responsibility

Sustainable environmental and climate protection

Sustainable environmental and climate protection, as well as efficient use of resources, are important issues for us. Therefore, we strive to reduce the environmental impact of our business activities and the development of our products, to continuously improve our environmental protection efforts and to promote environmental awareness among our employees – in order to protect the environment and the climate.

Therefore, we are committed to contributing to environmental and climate protection and to taking a precautionary approach to all our business activities with regard to their environmental and climate impact. In doing so, we comply with all relevant national and international environmental laws and regulations and hold all necessary permits and/or licences.

Environmentally friendly production

We are committed to finding safe and environmentally friendly solutions for the development, production, transport and disposal of all our products. In doing so, we avoid or reduce negative impacts on biodiversity, climate and water quality as much as possible.

Energy-efficient and environmentally friendly use of resources is our goal, and we are constantly working to optimize this. We also ensure that waste and wastewater are disposed of or discharged safely and in an environmentally sound manner in accordance with applicable regulations. We strictly reject any form of illegal eviction and expropriation for the acquisition, construction or other use of land, forests and waters.

Implementation and points of contact

Doing the right thing

This Code of Conduct is a guide that supports both correct and responsible behaviour and lays out our fundamental rules and principles. If in doubt as to whether a decision falls in line with these principles, the following questions will help:

- Is my decision legal?
- Is it in line with IDnow's rules and principles?
- Can I make the decision in the best interests of the company and free from any conflict of interest?
- The good reputation of IDnow will not be affected by my decision?
- Can I reconcile the decision well with my own conscience?
- Can I easily justify the decision?
- Would it stand up to scrutiny by a third party?

If you cannot answer “yes” to all questions, stop and seek advice from your supervisor, the Human Resources Department or Legal Department.

Seek advice, report violations

If you have any doubts or questions, or if you wish to report a violation, you can always contact

- your supervisor
- the management team
- the Human Resources Department or Legal Department.

All information will always be treated confidentially.

It is also possible to report suspected misconduct, illegal acts or failure to act within IDnow or complaints completely anonymously via an external reporting channel in accordance with the IDnow Whistleblowing Policy. This tool is designed to provide a confidential and secure channel for employees and has been launched by IDnow as part of our ongoing commitment to fostering transparency, accountability and a safe working environment for all members of our IDnow communities.