



FINGERPRINTS

# Our Success at Your Fingertips

Fingerprint Cards Code of Conduct



FINGERPRINTS

## Fingerprint Cards - Code of Conduct

*Latest revision: 2016-03-18*

*Issued by: Henrik Sundell, General Counsel*

*Approved by: Jörgen Lantto, CEO*

### Introduction

We at Fingerprint Cards deliver great ideas and tiny products. Our vision is that people are identified on any device by a simple touch.

To be able to look back with pride of what we accomplish we need to lead not only in excellence, but also by example. We know that conducting business on a global scale, and in complex market conditions, can be challenging. To support and guide you in your everyday work, we have developed this Code of Conduct.

Together with our core values, Smart, Brave, Open and United, this Code of Conduct forms the foundation of all our operations.

To begin with, we expect everyone who works with us and on behalf of us to comply with applicable laws and regulations in the place where you are operating, as well as globally accepted ethical standard and business practices. Our Legal Affairs function is there to support you should you have any questions. We also need to live up to the internationally recognized principles on human and labour rights, protecting the environment and working against corruption in all forms that we have signed up on as signatories of the United Nations Global Compact.

Everyone at Fingerprint Cards has an obligation to protect our company's interests and to show conduct of high integrity. If you have any concerns about any part of our business not being compliant with the principles of our Code of Conduct, I encourage you to raise any concerns you may have regarding unethical behavior either via your manager or through our Speak-Up system, the channel that guarantees you the opportunity to communicate in confidence.

Let's now all continue our way forward responsibly, because the world – and our common success – is at your fingertips.

/Jörgen Lantto, CEO at Fingerprint Cards.



## FINGERPRINTS

### About the Code

The Code applies to all of us working at Fingerprint Cards. It provides guidance on how we are expected to act in accordance with our company values as well as in compliance with all applicable legal and regulatory requirements. Our Code sets the minimum requirements. If provisions in local, national or international laws, regulations or rules take a more stringent position on the matters of the Code, those shall be observed and complied with. In cases of conflict between the Code and mandatory local legal and regulatory requirements, such mandatory local legal and regulatory requirements shall prevail.

All employees at Fingerprint Cards worldwide as well as consultants, representatives and others working for FPC (hereinafter “you” or “Fingerprint employees”) are expected to acknowledge and follow the Code.

Failure to follow the principles outlined in our Code will be taken seriously and could result in disciplinary action, ranging up to and including dismissal. In the case of a non-employee it could result in contractual remedies including termination of the contract.

We expect of our suppliers to also act in the spirit of the Code and our company values. In a separate Supplier Code of Conduct we outline our specific requirements on suppliers. All Fingerprint employees involved in contracting suppliers of products and services are expected to work actively to ensure supplier compliance with the Supplier Code of Conduct.

The original language of the Code is English. If translated into other languages, the English version shall prevail.

### Applying the Code

If you are a manager at Fingerprint Cards, you have a particular responsibility to lead by example and to ensure that the people in your team are provided with the training necessary to understand the Code. You are also expected to encourage a continuing dialogue about the Code and how it applies to everyday situations and decisions.

All employees are required to know and follow the Code, and stay updated with any changes to the Code. The Code of Conduct training module is a mandatory element of our introduction programs for new employees.

In addition to following the Code we expect you to comply with all applicable laws and regulations, and there is a zero tolerance to violations of the law. In some cases it may be difficult to know whether a particular matter is consistent or not with applicable laws and regulations or the Code. We encourage you, if there is any doubt, to consult with your manager or otherwise raise the matter in accordance with the Speak-Up process.

Our Code is the core document of our governance structure. The Code is supported by policies, other steering documents and procedures which in further detail stipulates our company requirements and rules.

If you have any questions about the content of the Code or of your responsibilities, please reach out to your manager, the Human Resources department or Legal Affairs.



## FINGERPRINTS

### The Principles

Our Code reflects the areas identified as vital for building trust and the continued success of our Company.

#### 1. Trusted and transparent business conduct

*Our success is built upon trust and transparency. To that end we must make business decisions that are in the interest of our company and its shareholders while being consistent with the values of other stakeholders.*

*It is our responsibility as a company to operate, and be perceived to operate, as a good corporate citizen.*

##### **Keeping accurate and correct records**

*As a company we are required to keep accurate financial records and ensure that the correct financial information is provided in all financial statements. Records related to human resources, health & safety, quality- and environmental management, agreements and other third party documents should be treated with the same respect.*

- We maintain well-managed and accurate records consistent with all applicable legal requirements and industry standards. This applies to all aspects of our business.
- We prepare our financial records in a timely manner, they are fact-based and fairly represent our business dealings.
- We ensure that we fulfil the obligations we have as a listed company.
- We maintain a system of internal control of the business record's accuracy.
- We apply and respect a system of segregation of duties and processes for approval and authorization

##### **Protecting company assets**

*Company assets include tangible assets, such as real estate, materials and products and personal equipment, as well as intangible assets, such as brands, patents and intellectual property rights. We expect all Fingerprint Cards employees to be mindful in the use of company assets, protecting them from damage, loss, undue dissemination or criminal acts.*

- We comply with internal controls designed to safeguard and protect our assets.
- We only use assets for business purposes unless otherwise authorized by appropriate management.
- We defend and enforce our intellectual property rights against infringements by any unauthorized third parties.
- We never use company assets for personal gain or for illegal activities.

##### **Communicating responsibly**

*Communication is important when building a strong brand and managing our reputation. Such communication can be verbal and written, internal and external, via channels such as the internet, printed publications and other media. It also includes social media such as blogs, internet forums, social networking sites, content communities and instant messaging.*

*Speaking on behalf of Fingerprint Cards through such channels is limited to authorized individuals and any statements must be approved for release to the public.*

- We have officially designated spokespersons to communicate publicly on behalf of our company in order to ensure professional, consistent, legally compliant, and honest responses to requests from the media, analysts and investors.
- We always make sure that information is accurate and not misleading.
- We also act carefully and respectfully when communicating about Fingerprint Cards as we communicate during our work as well as outside of work.



## FINGERPRINTS

### ***Safeguarding sensitive information***

*As a company we handle information with care. This includes, but is not limited to, our own business sensitive information, insider information, client related information, personal information of employees and other people with whom we interact. Since our company's shares are listed there are certain insider trading restrictions to be aware of.*

- We handle information about our company, our clients and other related parties with caution and take measures needed to ensure protection of business critical information.
- We are committed to the protection of personal information of our employees and stakeholders with whom we engage.
- We train our employees to ensure that they are knowledgeable regarding applicable restrictions of trade in shares and other financial instruments

### ***Respecting competition laws***

*Competition is a key driver for innovation and efficiency in the markets where we operate. Competition and antitrust laws prohibit anti-competitive agreements, abuse of market power and anti-competitive mergers and acquisitions.*

- We respect competition laws in all the markets in which we are active.
- We train our employees to ensure that they are knowledgeable regarding competition law, enabling and supporting them in identifying situations where competition law considerations are relevant.

### ***Ensuring responsible trade***

*Trade regulations cover areas such as rules of origin, customs, classification of goods, customs valuation, export control classification, export license management, restricted party screening, embargo and sanctions, anti-boycott provisions, and conflict mineral regulations.*

- We are dedicated to ensuring compliance with all applicable import and export laws and regulations.
- We train our employees to ensure that they are knowledgeable regarding responsible trade.
- We work actively to ensure a supply chain free of conflict minerals.

### ***Anti-bribery and anti-corruption***

*We have zero tolerance of bribery and corruption. Bribery means offering, giving, receiving, or soliciting of something of value for the purpose of influencing the action of an official or private company as they perform their duties. Corruption means abuse of entrusted power for private gain, which could include conflicts of interest, embezzlement, kickbacks, extortion, or nepotism.*

- We are committed to conducting business with high integrity which does not involve any forms of bribery and corruption.
- We do not directly, or through third-parties acting on our behalf, pay or offer to pay bribes.
- We do not offer or accept gifts that will improperly influence our business decisions or those of our partners.
- We are committed to and comply with all anti-money laundering legislation, including reporting obligations.



## FINGERPRINTS

### 2. Smarter and safer solutions

*We are committed to providing our customers with products that meet or exceed their expectations. We continue to develop new cutting-edge products and services, by being proactive in development of our employees and continue to attract and retain talented employees.*

#### **High quality services and products**

- We are committed to delivering high quality products and services that are safe, dependable and meet legal and regulatory requirements.
- We proactively work with continued learning and development of our skills, to ensure that we are in the forefront of our business sector.

#### **End-user in mind**

*Aiming for a leading position in our industry, we contribute to setting high standards for biometric identification, ensuring user friendliness and protection of user integrity in the use of our products.*

- We have the experience, convenience and integrity of the individual end-users in mind when developing biometric solutions.
- We work to avoid any potential negative environmental or health impacts during the use of our products.

### 3. Environmental protection and efficient use of resources

*Environmental responsibility means operating our business and providing products and services in a way that minimizes environmental impact and contributes to a more sustainable future. We must equip ourselves with the competence and tools necessary to address the environmental challenges in our industry and continuously minimize any negative impacts we may have. We comply with all environmental legislation and the requirements of any voluntary initiatives which we have joined*

#### **Resource efficiency and handling of waste**

*We continue to improve the design of our products and our processes so that energy, natural resources and raw materials are used efficiently, and waste and residual products are minimized.*

- We have the environmental consequences in mind when working with the design of our products and processes and evaluate alternatives, considering the life cycle perspective.
- We dispose of waste to recycling where available, and will ensure that it is made possible at our own locations.
- We clearly communicate environmental requirements to our suppliers and follow-up on their performance and will select those suppliers who demonstrate commitment to environmental protection.

#### **Precautionary approach**

- We work to avoid materials and methods posing environmental and health risks when suitable alternatives are available.



## FINGERPRINTS

### 4. Respecting and rewarding people

*As Fingerprint employees we are expected to respect each other, ensure that everyone is given the same opportunity to perform at their best and ensure that everyone is fairly rewarded for their efforts and achievements. We provide our employees with a safe, health promoting and inclusive workplace. We expect that we show the same respect and protect the rights of the people working for suppliers, clients and any others with which we do business or else engage with.*

#### ***An inclusive, equal and non-discriminating workplace***

*All our employees shall have equal opportunities based on competencies, experience and performance regardless of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social background or ethnic origin.*

- We treat each other with respect in the workplace. Discrimination, physical, sexual or verbal harassment, or any illegal threats are not tolerated.
- We actively promote diversity and gender equality through our recruitment processes, our career development plans and follow-up of employee satisfaction.

#### ***Health and Safety***

*Safety is prioritized in all aspects of us performing our work, at our offices and during our business travels.*

- We work with preventative measures to minimize any workplace accidents or other forms of occupational health risks, including diligent reporting of accidents and incidents (near accidents).
- We ensure that the appropriate safety equipment is available where needed.

#### ***Respecting human rights and labour rights***

*As a company we work to ensure that we are not involved in any human rights abuses and that we respect international labour rights.*

- We respect our employees' rights to freedom of association and collective bargaining.
- We do not force anyone to work more than the limits on regular and overtime hours allowed by the law of the country in which they are employed. Overtime shall be compensated in accordance with legal requirements.
- We ensure that all employees have contracts specifying the terms of employment.
- We have zero tolerance for any form of child labour, forced or compulsory labour.
- We communicate to our suppliers that we expect of them to respect human rights and labour rights, we will follow-up on their performance and select those suppliers showing commitment to the protection of human and labour rights.



## FINGERPRINTS

### Reporting of violations and concerns

You may come across a situation that appears to be inconsistent with our company values as set out in the Code, our policies, or the law. In such event we expect you to bring your concern to the company's attention, either by speaking directly to your manager or, if you do not feel comfortable going to your manager, you can use our "Speak-Up" system. You are to report any conduct believed, in good faith, to be a violation of laws or the other expectations on conduct defined by this Code of Conduct.

All reports that are received will be evaluated and investigated if necessary. Relevant case details that you provide will be duly recorded. We will do our utmost to keep the information you provide confidential. If local laws permit, you may remain anonymous; however, if you wish to report a concern you are strongly encouraged to identify yourself to help facilitate an investigation. Your privacy and integrity is of great importance. As outlined in our Speak-Up policy, no retaliation is taken against an employee or any other person who, in good faith, voices their concern regarding a matter related to this Code of Conduct.

### Suppliers

As a supplier to Fingerprint cards or any of our subsidiaries you are expected to act in the spirit of this Code. For suppliers we also have a specific Supplier Code of Conduct.