

Corporate Social Responsibility Code of Conduct



Table of contents

Message from the President and CEO	3
Linxens' Core Values.....	4
Purpose of this Code	5
Linxens' Compliance Department	5
Linxens' Commitments and Policies	6
1. Compliance & Ethics.....	6
2. Human Rights.....	6
2.1 - Human Rights and Workplace	
2.1.1 - Prohibition of Child Labor	
2.1.2 - Forced and compulsory Labor	
2.1.3 - Working time	
2.1.4 - Fair Wages and Benefits	
2.2- Human Rights and Labor Relations	
2.2.1 - Freedom of opinion and expression	
2.2.2- Promotion of social dialogue	
2.2.3- Intolerance of discrimination	
2.3- Human Rights and Political or Religious Activities	
3. Data Protection.....	7
4. Assets, Intellectual Property	
and Information Security.....	8
5. Financial and Accounting records	8
6. Health, Security and Environment.....	9
6.1 - Health and Security	
6.2- Environment	
7. Conflict Minerals.....	9
8. Conflicts of Interests.....	10
9. Committing to professionalism and quality	10
10. Antitrust and Competition Laws.....	10
11. Anti-Bribery Laws and Anti-Money Laundering	11
11.1 - Anti-Bribery Laws	
11.2 - Anti-Money Laundering	
12. International Sanctions and Export Controls	12
Raising Concerns - Alerting	13
Violations of the Code of Conduct	13
Glossary	14

MESSAGE FROM THE PRESIDENT & CEO



*Christophe
Duverne*

Dear All,

Linxens has been and is fully committed to its Corporate Social Responsibility towards all the Group's stakeholders – customers, suppliers, employees, communities and institutions. Beyond the expected compliance with local legislation and regulations, we strongly believe that setting the highest standards in terms of ethics, business integrity and sustainability is our responsibility. It is part of our values and missions, it is part of our DNA.

Therefore it was natural for the Group to join the United Nations Global Compact (UNGC) and its 10 Principles in August 2017, to reaffirm these values and work towards making them universally accepted throughout the world.

Our environment is changing and will continue to change. We have recently changed ourselves and we need to continue improving, taking all the challenges we are facing with as opportunities to make us better.

The implementation of the Linxens CSR policies which includes in particular the Business Code of Conduct, the Anti-Bribery Policy and the Competition Laws Code of Conduct, as well as the organization of the Compliance Department and the availability of our Ethics Line, are basic but essential milestones for us.

I am convinced that Linxens' success cannot be separated from the well-being of our environment and our communities. We cannot conceive to be successful without being compliant and responsible towards all our stakeholders.

I count on each of us to continue promoting our objectives of excellence and assist in implementing and improving our Corporate Social Responsibility Program as it is key to our future success.

Very truly yours,

Christophe Duverne
President & CEO

Linxens is a global leader in the design and manufacture of Microconnectors and RFID

Antennas and Inlays.

We are the leading solution-provider for telecom, financial services, access control, e-Government, healthcare, hospitality, leisure & entertainment, IoT and transportation markets.

We also use our technical expertise to offer innovative LED lighting solutions.

Our brand is built on four pillars which embody our values, define who we are and how we want to work.

Proven Excellence:

provide our customers with the best in class and most innovative solutions as well as ensuring the expertise of our employees

Associated values: Excellence, Innovation and Reliability

Collaborative mindset:

work hand in hand with our customers and encourage teamwork throughout the company

Associated values: Client proximity, Collective performance and Trust

More than a job:

strengthen relationships between all of us at Linxens and with the communities in which we live

Associated values: Commitment, People development and Personal fulfilment

Visionary:

always be aware of what is happening in the world around us

Associated values: Agility, Openness and Integrity

Our vision:

A world where digitalization is pervasive, and seamless and secure connections are critical.

Our mission:

Relentlessly drive secure connectivity one step further.

Purpose of this Code

Governing Rules for All

For the purposes of this Code, the terms **"Linxens"**, **"Linxens group"** or **"Group"** all refer to Financière Lully A, the parent company of the Linxens group, and its subsidiaries.

The purpose of this Corporate Social Responsibility Code of Conduct (the **"Code"**) is to establish a set of governing principles applicable to the whole Linxens group (managers and employees) and their different stakeholders i.e. customers, suppliers, contractors, business partners and shareholders (the **"Business Partners"**).

In case new companies become part of the Group, Linxens will do its best efforts to start implementing the standards and principles of this Code within such new companies in the shortest timeframe possible. This Code should be referred to as a decision-making tool. It however only provides a framework and is not intended to set a detailed and exhaustive list of all rules that govern the Group's activities. It shall be supplemented from time to time by complementary policies and procedures, either at the Group level or specific to a Group company or an activity.

It is the responsibility of each Linxens employee to comply with the Code and act ethically in their day-to-day activities to sustain Linxens global reputation.

Business Partners are expected to adhere to the Code and apply standards that are equivalent to Linxens' principles. This Code is available on Linxens' website, as well as the corresponding policies. In addition, all applicable codes, policies and procedures are available to Linxens employees on Linxens' intranet. To assist the reader, a glossary of defined terms can be found at the end of this Code.

Linxens' Managers play an essential role in complying and promoting the spirit of this Code. They are expected to set the tone for the whole Group and ensure awareness by all Linxens employees and Business Partners. They should as such be the first to whom employees turn to with questions.

Managers and the Code

Managers are responsible for ensuring that this Code and any applicable supplemental policy or procedure are applied within their own area and thereby demonstrate, in case an incident occurs, their determination to solve any non-compliance issue.

Managers however should not take action on their own on sensitive and potentially serious matters; they

should advise their own manager or the Compliance Department of any such non-compliance issue, who will in turn handle the issue, strive to identify the cause and prevent any recurrence.



Linxens' Compliance Department

The Chief Compliance Officer (CCO) is responsible for overseeing the promotion, roll-out and proper implementation of the rules arising from this Code.

The Chief Compliance Officer is appointed by the Chief Executive Officer and reports to the Executive Committee. The Chief Executive Officer and the Executive Committee are committed to making this mission successful by providing the Chief Compliance Officer and his or her team with the necessary means to seek continuous improvement and allowing him or her to perform this mission independently.

The Chief Compliance Officer is assisted in his or her mission by a network of local correspondents who are the points of contact for the employees in the different Linxens subsidiaries and/or branches to assist him or her locally.

The Compliance Team can be reached at any time at cco@linxens.com.

Linxens' Commitments and Policies

This Code is construed in accordance with international standards and in particular with the Organization for Economic Cooperation and Development (OECD) Principles of Corporate Governance.

1. Compliance & Ethics

Linxens is fully committed to its Corporate Social Responsibility towards all of its Business Partners. Therefore, beyond the expected compliance with local legislation and regulations, Linxens strongly believes that setting the highest standards in terms of ethics, business integrity and sustainability is its responsibility.

In this respect, our employees, who in addition may be considered by third parties as representing Linxens at any time, even in the private sphere (including their personal social network accounts), are expected to comply with these highest standards at any time.

2. Human Rights

Linxens has a duty to respect and promote internationally recognized human rights, both internally and with its Business Partners. Linxens is committed to defending diversity, to prohibiting any kind of discrimination and to promoting health and safety principles. As such, Linxens defends the values of the international community, notably the United Nations Universal Declaration of Human Rights (UDHR) and the International Labor Organization's Declaration of Fundamental Principles and Rights at work.

Linxens joined the United Nations Global Compact in August 2017 to reaffirm these values.

Moreover, Linxens favors the selection of its Business Partners on the basis of their ability to comply with the Code and in particular with Linxens' Human Rights commitments set in the paragraph 2 of the Code and to apply them to their own employees as well as to their subcontractors and next-tier suppliers.

2.1 - Human Rights and Workplace

2.1.1 - Prohibition of Child Labor

The use of child labor in the manufacture of products or the provision of services in ways that are illegal, socially unacceptable or lead to a child losing his or her educational opportunities is not tolerated.

Linxens works towards the elimination of child labor and believes that societies that permit child labor are jeopardizing their future and that of future generations. Linxens adheres to minimum age provisions of national labor laws and regulations, and, where national law is insufficient, takes into account international standards, in particular the C-138 and C-182 ILO's Convention. In addition, relevant mechanisms are used for age verification in recruitment procedures. Linxens does not employ people under 18 years old. In order to contribute to their education, young workers are admitted from the minimum age permitted by law for internship and apprenticeship. Internship and apprenticeship contracts are used only for contributing to the education of young workers which working hours and remuneration comply with local laws.

2.1.2 - Forced and compulsory Labor

Linxens does not tolerate the use of convict, indentured, slave, bonded, or other Forced Labor, including human trafficking, either directly or indirectly, by its Business Partners, or by any subcontractors utilized by its Business Partners.

This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation.

All employees, both foreign and national, must be treated equally, and will not be required to pay fees to agencies or the factory in exchange for employment.

2.1.3 - Working time

Linxens recognizes the right to rest and leisure and therefore complies with local laws, regulation and/or local customs with regards to working overtime hours.

2.1.4 - Fair Wages and Benefits

Linxens compensates its employees fairly, taking into account the country and industry standards, in compliance with wage and working time applicable laws, in particular, the minimum wage ones.

Linxens undertakes to contribute to all statutory social security and welfare funds to which employers and/or employees are required by applicable laws to contribute, including medical insurance, industrial injury insurance, pension, housing and unemployment funds. In some countries, where basic health care is not sufficiently provided by the government and/or there is no possibility for employees to arrange for basic health care themselves, Linxens provides or ensures an access to basic healthcare.

2.2 - Human Rights and Labor Relations

2.2.1 - Freedom of opinion and expression

Linxens recognizes that by virtue of international Human Rights standards, every individual has the right to freedom of opinion and expression. The right to freedom of expression guarantees that no one should be harassed on account of their opinions.

Linxens recognizes the freedom of association for all its employees and does not interfere with employees' rights to form or join any workers' organization to protect their interests in the workplace.

2.2.2 - Promotion of social dialogue

Linxens encourages Collective Bargaining and is committed to facilitating and maintaining the Collective Bargaining process in good faith.

2.2.3 - Intolerance of discrimination

Linxens strives to create an environment free of any discrimination in the treatment of individuals, based on criteria other than competencies and aptitudes.

2.3 - Human Rights and Political or Religious Activities

Linxens recognizes the rights individuals have to take part political or religious activities. Linxens expects its employees to clearly indicate that they do not represent Linxens and to inform their manager in the event a conflict of interest may arise from these activities. Linxens maintains a neutral position with respect to politics and religion and any contributions to political or religious activities on behalf of Linxens is forbidden. Any Human Rights issue should be disclosed and reported by Linxens employees to their manager or the Compliance Team.

In case of any doubt, consult your manager or the Compliance Team at cco@linxens.com for additional guidance.



3. Data Protection

Linxens complies with all applicable privacy and data protection laws, wherever it does business.

Employees who have access to Personal Data shall be only those whose function and responsibility specifically include the handling of Personal Data; the right of access is restricted according to the nature and scope of the individual function and responsibility. Linxens does not communicate personal information to third parties, except to the extent necessary and permitted by applicable laws or regulations. Any personal information Linxens collects is treated with care, protected and used lawfully and properly. Data privacy laws vary by jurisdiction.

Consult your Compliance Team at cco@linxens.com or the Legal Department for additional guidance.



4. Assets, Intellectual Property and Information Security

Linxens is a world-class provider of component-based solutions for the security and identity markets and our products are used in a wide range of applications by smartcard manufacturers, chipmakers and module manufacturers in the telecom, financial services, access control, e-Government, healthcare, hospitality, leisure & entertainment, IoT and transportation markets.

In this respect, preserving, protecting and responsibly using Group's assets, including intellectual property is essential to remain competitive and serve the interests of the Group and its shareholders.

For that purpose, Linxens devotes, among other things, a substantial part of its revenue to research and development (R&D) activities.

Linxens expects its employees to strictly comply with the internal policies and take all proper and necessary steps to preserve and protect its R&D and more generally any Linxens know-how and confidential information.

Confidentiality obligations are further detailed in the employment agreements and/or Linxens' internal rules and [Linxens IS Charter](#). In particular, Linxens IS Charter provides employees with a non-exhaustive list of measures to protect information and resources and steps to take in case of an incident. In particular, prior to speaking publicly or publishing anything on Group matters internal, appropriate consent should be obtained. Any media contact should be referred to the Group Communications Director.

In case of any doubt, consult your manager or the Compliance Team at cco@linxens.com for additional guidance.

5. Financial and Accounting records

Linxens' Financial and Accounting records serve as a basis for managing its businesses and are essential in fulfilling its responsibility to Linxens' shareholders and other Business Partners. They also are necessary for preparing the financial statements, accounting and tax filings and financial documents that the Group has to make publicly available, when applicable.

Linxens is committed to maintaining accurate, timely and complete Financial records.

In addition, the Capital Expenditure procedure further details the authorization process to be followed to initiate expenses and investments and the [Anti-Bribery Policy](#) addresses cases where irregular payments may be the basis for bribery or corruption acts. Any person, including Linxens' employees, may submit a financial or accounting irregular issue to the Group Chief Financial Officer who shall, if necessary in coordination with the Chief Compliance Officer, take the necessary steps.

In case of any doubt, consult your manager or the Compliance Team at cco@linxens.com for additional guidance.

6. Health, Security and Environment

6.1 - Health and Security

Linxens strives to provide a safe and healthy work environment for its employees.

Every effort is made to ensure that risks of accidents, injury and exposure to health risks are minimized. It recognizes that providing a safe and healthy work environment is fundamental to a productive and competitive work environment.

Linxens is committed to providing a secure work environment, where employees are not encumbered by concerns for their personal safety or security due to internal or external threats. To ensure the safety and security of employees, safeguards are provided as needed, both through Collective Bargaining agreements (or similar instruments) and local company policies and practices.

6.2 - Environment

Linxens is engaged in optimizing the use of resources in its products and industrial processes, reducing the impacts on the environment and reinforcing its environmental management system in order to contribute to a better future for next generations.

Linxens has established a policy which aims to control and minimize the environmental impacts of its activities and is committed to a social and environmental responsibility shared approach. Linxens expects its employees to comply with its environmental management principles.

Linxens forbids the manufacturing and/or selling of products that present an unacceptable risk for individuals' health and the environment and favors the selection of Business Partners on their abilities to comply with the Linxens' principles.

In case of any doubt, consult your manager or the Compliance Team at cco@linxens.com for additional guidance.

7. Conflict Minerals

Linxens recognizes the risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict affected areas.

Linxens is committed to sourcing responsibly throughout its supply chain.

In particular, Linxens is committed to not knowingly purchase raw materials containing tin, tantalum, tungsten or gold (the "**Conflict Minerals**"), that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo and neighboring countries (the "**Covered Countries**").

Linxens expects its supply chain to be likewise committed to responsible sourcing and require that its suppliers be fully committed to ensuring that their use and sale of Conflict Minerals do not contribute to the ongoing conflict in the Covered Countries.

Suppliers are expected to implement supply chain due diligence processes to identify sources of these minerals and support efforts to eradicate the use of Conflict Minerals which directly or indirectly finance or benefit armed groups and to keep Linxens informed.

Linxens will take appropriate actions to remove Conflict Minerals from any of its products and may suspend or terminate immediately relationships with any supplier who does not comply with supply chain due diligence processes.

In case of any doubt, consult your manager or the Compliance Team at cco@linxens.com for additional guidance.



8. Conflicts of Interests

A conflict of interests is a situation where the personal interest of an employee may be or may appear to be, directly or indirectly, in a potential or actual conflict with his or her job's responsibilities and/or the interests of any Linxens entity or Linxens' interests.

Situations where the personal interests of an employee could inappropriately influence or appear to influence their business judgement may hurt the reputation and business of Linxens and should be avoided.

Linxens' employees are expected to make business decisions that are based solely on Linxens' best interest and prohibited from entering into any conflict of interests.

Conflicts or potential conflicts of interests should be disclosed and reported by employees without delay to their manager and/or the Compliance Team.

In case of any doubt, consult your manager or the Compliance Team at cco@linxens.com for additional guidance.

9. Committing to professionalism and quality

Linxens considers both customers and suppliers as valuable partners and Linxens' decisions aim at enhancing their satisfaction and long-term relationships with Linxens.

Linxens is committed to supplying products and services to its customers which meet their expectations of quality, integrity and reliability and constantly improving its technologies and methods with a high standard of innovation and safety.

The quality of Linxens' relationships with its customers and suppliers is essential to Linxens' success.

Linxens and all employees must look to work with Business Partners who demonstrate strong business values, ethical principles and support Linxens' commitment to quality.

Professionalism ensures the ability of Linxens' businesses and relationships to grow and thrive.

10. Antitrust and Competition Laws

Competition and antitrust laws are intended to ensure free and fair competition between companies on the market. Their violation may result in important fines and damages both for the individuals and the enterprise involved. In some countries, certain violations may entail prison sentences.

Linxens is committed to free and fair competition and expects its employees and Business Partners to abide by the same rules.

In particular, Linxens undertakes not to participate in cartels fixing prices, agreements on quotas, production or sales, or more generally, any unfair practices which impede free competition, in particular those intending to oust a competitor from the market or restrict access by new competitors to markets by unlawful means.

[Linxens Competition Laws Code of Conduct](#) provides further details to assist employees in identifying potential competition issues, recommendations and procedures to comply with applicable internal rules and laws.

In case of any doubt, consult your manager or the Compliance Team at cco@linxens.com for additional guidance.





11. Anti-Bribery Laws and Anti-Money Laundering

11.1 - Anti-Bribery Laws

Bribery is a widespread phenomenon in international business transactions, including trade and investment, which raises serious moral and political concerns, undermines good governance and economic development, and distorts fair competitive conditions.

Linxens fights corruption in any form, including influence-peddling, whether it is active or passive, direct or indirect, or private or public and has decided to define a specific policy on this matter.

All Linxens employees, as well as any party acting on behalf of Linxens, are prohibited from making or accepting, offering to make or accept, or promising to make or accept any bribery whether or not any benefit is actually received.

No bribe may be provided, offered to or accepted from any person in exchange for recommending, purchasing, supplying or administering Linxens' products or for a commitment to continue to do so. Nothing may be offered, provided or accepted in a manner or on conditions that would have an inappropriate influence on a person's action or conduct, or that would create the appearance of doing so. Employees and any party acting on behalf of Linxens should not appear as unduly influencing suppliers, customers or government officials in any way.

Employees are not permitted to accept any gift or gratuity/invitation from customers or suppliers in any form whatsoever (in particular, amounts of money, merchandise, services, entertainment, or travel) except where the gift or gratuity/invitation is of a token value. Linxens favors the selection of its Business Partners on the basis of their ability and commitments to comply with anti-corruption principles set in this Code and the Linxens Anti-Bribery Policy.

[Linxens Anti-Bribery Policy](#) provides further details to assist employees in identifying potential corruption issues, recommendations and procedures to comply with applicable internal rules and laws (such as the US FCPA, the UK Bribery Act or the French anti-corruption laws) and selection processes for Business Partners.

At any time, guidance may be provided to employees by the Compliance Team. In case of any doubt, consult your manager or the Compliance Team at cco@linxens.com.

11.2 - Anti-Money Laundering

Money laundering is the processing of criminal proceeds in order to disguise their illegal origin.

Linxens is committed to complying with all applicable anti-money laundering laws and to answer to any legitimate request of information on this basis.

In compliance with applicable anti-money laundering laws, Linxens conducts business with reputable Business Partners and undertakes to conduct due diligence aiming at verifying the origin of funds.

12. International Sanctions and Export Controls

Trade embargoes and economic sanctions prohibit or severely restrict business activities with certain countries and their nationals, as well as business activities with specifically-listed entities and persons.

Linxens is committed to complying with all applicable export, import and trade compliance laws in all countries in which Linxens does business.

In doing business across borders, all employees and Business Partners must be aware of and follow these specific regulations and this Code and the Linxens Export Control and Fund Freezing Policy. The Linxens Export Control and Fund Freezing Policy provides further details to assist employees in preventing and avoiding violations of Export Control and/or fund freezing rules.

These laws are complex and change frequently. Employees should refer to the Compliance Team or the Legal department whenever necessary to ensure compliance and confirm all relevant trade restrictions.



Raising concerns - Alerting

Linxens encourages and secures reporting from employees, Business Partners and other stakeholders (the "Reporter") should they believe that a conflict arises between Linxens' operations and this Code and its corresponding policies, through a whistleblowing system, ensuring anonymous reporting and protecting the Reporter from discriminatory sanctions.

For the sake of clarity, all persons to whom this Code applies are protected by law from retaliation for reporting violations, suspected violations, or other alleged activities outside or inconsistent with this Code or for participating in procedures connected with an investigation, proceeding or hearing conducted by Linxens or a government agency with respect to such complaints.

Linxens will take disciplinary action up to and including the immediate termination of any employee or contract worker who retaliates against another employee or contract worker or third parties for reporting any violation, suspected violation, or other alleged activities outside or inconsistent with this Code.

For more information about Linxens' Policy for reporting violations and non-retaliation please consult the [Linxens Whistleblowing Policy](#).



Violations of the Code of Conduct

Effect on Linxens

Violation of this Code may entail serious consequences for Linxens such as termination of contracts, loss of future business, severe monetary fines or civil or criminal sanctions, and even sanctions against individuals.

Effect on Employees

If any incident occurs that violates this Code, management will demonstrate, internally and externally, their determination to solve the problem and strive to identify the cause and prevent its recurrence. Over and above any legal consequences, any employee who does not comply with this Code, in person or through family members where the employee is presumed to exercise some control over them, may be subject to disciplinary action. Wherever local law requires to, this Code shall be inserted in the Linxens company internal regulations and subject to an employees' representatives consultation procedure.

Effect on Business Partners

Linxens will take appropriate actions to mitigate the effects of any violation of the Code. Linxens may suspend or terminate immediately and without prejudice to any damages, relationships with any Business Partner who does not comply with this Code.

In case of any doubt, consult your manager or the Compliance Team at cco@linxens.com.

Glossary

Confidential Information shall mean all information of whatever kind or nature, which belongs to Linxens: information not disclosed to public about technology (including Intellectual property or trade secrets, clients, business plans, promotion and marketing, finance and others activities). Confidential Information may include confidential or proprietary information of third parties.

Collective Bargaining process is a voluntary process that determines terms and conditions of work and establishes the effective working relationship between management, employees and unions.

Conflict Minerals are the Covered Countries' 3TG minerals: tin, tungsten, tantalum and gold.

Covered Countries shall mean the Democratic Republic of the Congo (DRC) and any country that shares an internationally recognized border with the DRC. Such countries presently include Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

Export Control regulations impose restrictions on the transfer of certain articles and technology to foreign destinations or persons. Restrictions of imports or exports may concern goods, services, technologies or information

Financial and Accounting records may be the books of account, budget proposals, economic evaluation for projects and the like.

Forced Labor refers to any kind of work or service (forced and compulsory labor, prison labor, slavery...) exacted from an individual under the threat of any penalty, violence (physical or mental) or punishment and for which the individual did not volunteer.

Personal Data refers to any information that can be used to identify an individual, whether directly or indirectly. For instance, name, date of birth, social security number, photograph, location data, email address, IP address are personal data.

