



# **GMO GLOBALSIGN SUPPLIER CODE OF CONDUCT**

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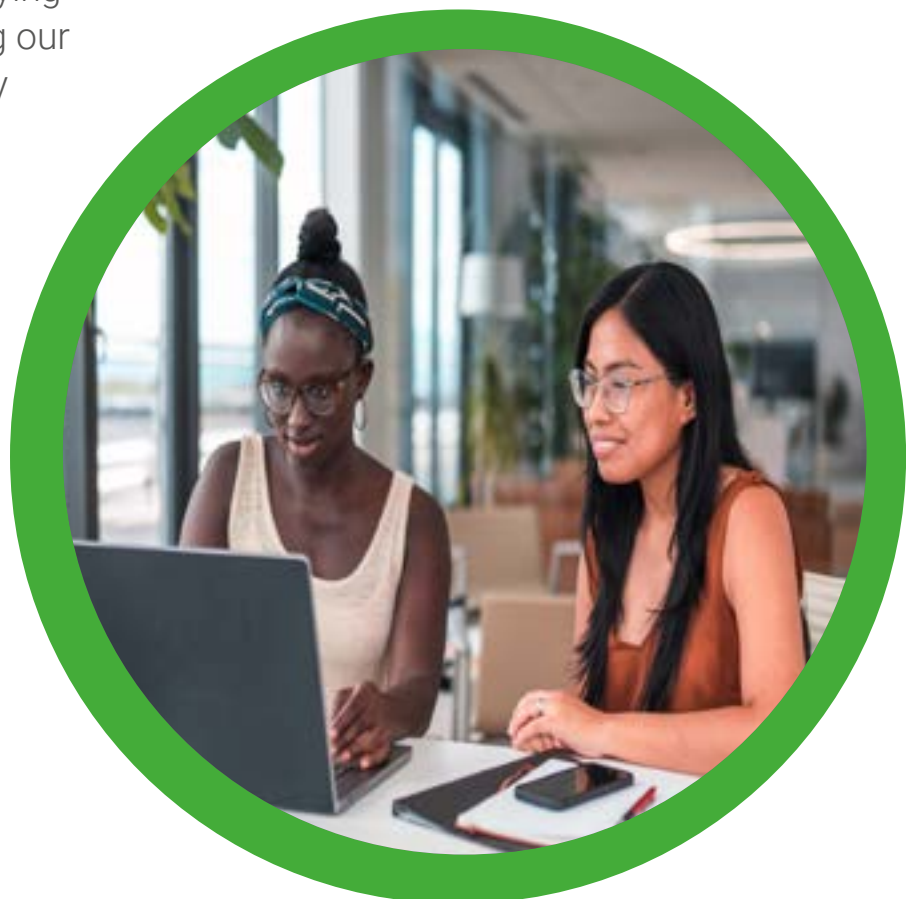
# Introduction

## About GlobalSign

GMO GlobalSign (“GlobalSign”, “Company”, or “we”) is the leading provider of trusted identity and security solutions enabling businesses, large enterprises, cloud service providers and IoT innovators around the world to secure online communications, manage millions of verified digital identities and automate authentication and encryption. Our high-scale Public Key Infrastructure (PKI) and identity solutions support the billions of services, devices, people, and things comprising the Internet of Everything (IoE).

## Our People

Trust is a people thing. Despite the ever-evolving nature of technology, the importance of trust between people remains constant. Our global and diverse workforce is the cornerstone of our success. They each bring their unique skill, knowledge, and perspective to create a stable tapestry of customer centric innovation. Our people are our most valuable asset, embodying our mission and values, ensuring our continued growth. As technology evolves, the need for trusted, verified, and easily deployed digital identities to secure our connections will continue to grow globally. GlobalSign is here to provide security through digital identity for everyone and everything.



## Supplier Code of Conduct

GlobalSign is committed to applying high standards of ethics and business conduct in all of the countries in which we operate and within all of our business relationships. GlobalSign's [corporate policies](#) set out our commitments to the principles imposed by this Supplier Code of Conduct ("Code") and we expect our suppliers, vendors, partners, resellers, service providers, and other third parties who provide goods and services to GlobalSign ("Suppliers") to uphold the same values.

The aim of this Code is to set a mutual understanding of the principles that we expect our Suppliers to adhere to and apply to the third parties in their own supply chain. Establishing a joint commitment to this Code is an important step towards building trusted business relationships, and we require all Suppliers to affirm their acceptance and compliance with the principles of this Code, and commitment to continuous improvement.

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# Conducting Business with Integrity

We expect our Suppliers to understand and comply with all applicable laws and regulations where they operate. If there is a conflict between any applicable laws or regulations, the agreement between us and the Supplier, and this Code, the Supplier shall meet the most stringent standard.

## Anti-Bribery and Anti-Corruption

Suppliers must comply with the anti-corruption laws, directives and/or regulations that govern its operations. To that end, the Supplier shall not accept, offer, promise, pay, permit, or authorize:

1. bribes, facilitation payments, kickbacks, or illegal political contributions;
2. money, goods, services, gifts entertainment, employment, contracts, or other things of value, to obtain or retain an advantage; and
3. any other unlawful or improper payments or benefits.

## Unfair Business Practices

We expect Suppliers to compete honestly and fairly, comply with applicable antitrust and competition laws and never participate in anti-competitive practices. Suppliers must not fix prices or rig bids with their competitors. They must not exchange current, recent, or future pricing information with competitors.

## Financial Integrity

Suppliers must keep accurate books and records that reflect transactions and asset dispositions in reasonable detail, supported by a proper system of internal accounting controls. When a record is no longer needed to conduct current business, records should still be retained based on the applicable retention requirements.

## Conflict of Interest

We expect our Suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest, in their dealings with GlobalSign. Our Suppliers must notify all affected parties if an actual or potential conflict of interest arises. This includes a conflict between the interests of GlobalSign and personal interests or those of close relatives, friends, or associates.

# Employment, Working Conditions and Human Rights

## Safe working conditions

Suppliers shall:

1. provide a safe, healthy, and sanitary working environment and comply with all applicable health and safety laws and any other relevant laws where it operates; and
2. adopt safe work procedures to identify, assess, and control health and safety risks and support accident prevention for all workers and/or contractors or other third parties.

## Anti-Slavery and Human Trafficking

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. The Supplier shall comply with all applicable anti-slavery and human trafficking laws, statutes, and regulations in time to time in force in any party of its supply chain.

## Fair Treatment and Equal Opportunities

Suppliers must ensure that all employees are treated with dignity and respect and are free from harassment, intimidation, or other bullying at work. Suppliers must ensure that their workers are afforded an employment environment that is free from violence, corporal punishment, physical, psychological, sexual, and verbal harassment, unreasonable restrictions on entering or exiting work facilities, or other abusive conduct.

GlobalSign is an equal opportunities employer. Suppliers shall not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement, or any employment practice on the basis of race, colour, national origin, gender, gender identity, sexual orientation, religion, age, marital or pregnancy status, disability, or any other characteristic other than the worker's ability to perform the job subject to any accommodations required or permitted by law.

## **Freedom of Association and Collective Bargaining**

Suppliers shall respect, and shall not interfere with, the right of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining.

## **Wages and Remuneration**

Suppliers must pay their workers punctually and provide compensation (including overtime pay and benefits) that, at a minimum, satisfy applicable laws. Suppliers are required to provide their workers with the basis on which workers are being paid in a timely manner via wage statements or similar documentation. Deductions from wages as a disciplinary measure are not permitted.

# Environmental Impact

Suppliers shall ensure that:

1. their operations comply with all applicable environmental laws, including laws and international treaties relating to (but not limited to) climate change, waste disposal, emissions, discharges, and hazardous and toxic material handling;
2. goods they manufacture (including the inputs and components that they incorporate into their goods) comply with all environmental laws and treaties; and
3. they will only use packaging materials that comply with all applicable environmental laws and treaties.

Suppliers shall have in place a suitable environmental management system commensurate to their business operations for managing its environmental risks.

The system should include and address the following:

1. an assessment of the environmental impact of all historical, current, and future operations;
2. steps to continuously improve environmental performance, reduce pollution, emissions, and waste;
3. measures to reduce the use of all raw materials, energy, and supplies; and
4. raising awareness and training workers in environmental matters.



# Information Security and Data Protection

As a provider of trusted identity and security solutions the security of GlobalSign's services and customer information is of the highest priority. The practices and controls that we implement to ensure the integrity, confidentiality, and availability of our environment are summarized in our published [Information Security White Paper](#). We expect all Suppliers to demonstrate a similar commitment to security including the implementation of appropriate measures which are proportionate to risk and designed to:

1. protect the integrity and confidentiality of information (including information belonging to or supplied by GlobalSign) held on its systems (which include physical and online or electronic systems); and
2. ensure that there is no unauthorized access of the information by any third parties.

GlobalSign respects the right to privacy of its customers and workers. Our privacy policy is based on ISO27701 (Privacy Information Management System), in line with the European Union General Data Protection Regulation (GDPR) and applies to the entire GlobalSign network and to all the information collected for issuing the entire range of GlobalSign products and services. Suppliers shall comply with all applicable data protection laws and requirements when processing any personal data on GlobalSign's behalf.

# Code Expectations and Violations

We expect Suppliers to:

1. take active steps, including audits and inspections, to ensure compliance with this Code and applicable legal requirements.
2. maintain a training program for all workers to ensure that they are aware of the requirements of this Code.
3. provide their workers with avenues for raising legal or ethical issues or concerns without fear of retaliation, and Suppliers must have a process to investigate and resolve such issues and concerns (whistleblower protection). We expect our Suppliers to take action to prevent, detect, and correct any retaliatory actions.
4. implement their own written code of conduct and to flow down the principles in this Code to the entities that furnish them with goods and services.

## Supplier assessment and selection

During the Supplier selection and on-boarding process, all Suppliers will be required to affirm their acceptance and compliance with the principles of this Code. Suppliers may be asked to re-affirm compliance with the Code periodically thereafter.

GlobalSign may engage in monitoring activities to confirm Supplier's compliance to this Code including the use of periodic questionnaires, review of publicly available information, requesting certificates that are required to demonstrate compliance with applicable laws or frameworks, or other measures necessary to assess Supplier's performance.

## Reporting code violations

Suppliers must report any violations of this Code or GlobalSign's corporate policies as soon as possible to GlobalSign at: [concerns@Globalsign.com](mailto:concerns@Globalsign.com)

In the event of a violation of any of the expectations of the Code, GlobalSign will aim to provide the Supplier with a reasonable opportunity to remedy through agreed upon corrective actions, unless the violation is significant or results in a violation of the law. In the case of a violation of law or regulation, GlobalSign may be required to report those violations to proper authorities. GlobalSign reserves the right to terminate our relationship with any Supplier who fails to uphold the principles of the Code.

## Raising concerns

If colleagues or external parties have any concerns about potential misconduct or violations of laws, policies, values, or professional conduct, these can be raised confidentially at: [concerns@Globalsign.com](mailto:concerns@Globalsign.com)

