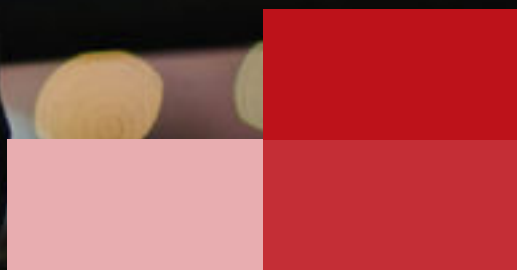




AUSTRIACARD HOLDINGS

CODE OF CONDUCT

September 2025



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AUSTRIACARD HOLDINGS

Lamezanstrasse 4-8
A-1230 Vienna, Austria

Phone: +43 (0)1 61065 – 0

Email: info@austriacard.com

Website: www.austriacard.com

Key note from the Management Board

Dear Ladies and Gentlemen,

At AUSTRIACARD HOLDINGS AG, we are proud of our long-standing tradition as a trusted company in the field of information management, printing, and communications. As a globally active group, we recognize that our success is not only defined by what we achieve, but also by how we achieve it.

Our journey to an international player has been shaped by innovation, adaptability, and a deep understanding of the needs of our stakeholders. This includes our employees, customers, suppliers, business partners, investors, and the broader public.

Throughout this development, we have cultivated a strong corporate culture rooted in integrity, responsibility, and foresight. These values remain central to our identity, even as we continue to grow and evolve in a dynamic global environment.

This Code of Conduct sets out the principles and standards that guide our actions. It reflects our commitment to ethical business practices and responsible decision-making. It is designed to help us navigate complexity with clarity and to ensure that our conduct remains aligned with the expectations of those who place their trust in us.

We thank you for your continued commitment and support on this shared path.

Vienna, 2025

The Management Board
AUSTRIACARD HOLDINGS AG

1. Introduction

1.1. General Principles

Our reputation is one of AUSTRIACARD's most valuable assets, which must be protected and developed. This Code of Conduct is central to achieve that goal. It describes how we are to behave, not just in general terms, but when faced with a range of situations where our actions could have a critical impact on the reputation of AUSTRIACARD.

As a general principle, we in AUSTRIACARD comply with all applicable local, national and international laws, regulations and voluntary commitments wherever we do business. It is not only what we do, but how we do it which will determine our reputation with our stakeholders and help ensure our continued success. Obeying local laws and regulations is of the utmost importance. As an international company, there are many different laws and regulations we need to follow. We are responsible for obeying to all of those rules and control mechanisms that apply to our work, as well as our own company policies.

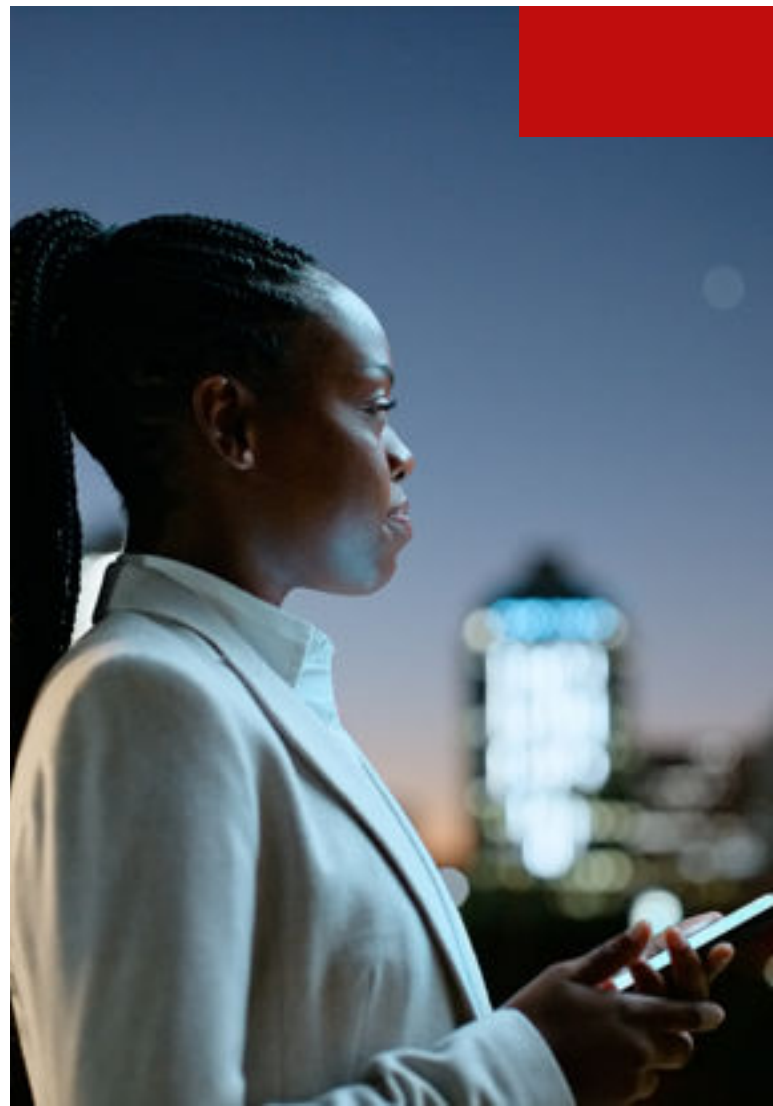
1.2. Scope of application

The Code of Conduct applies to AUSTRIACARD HOLDINGS AG and all

companies in which AUSTRIACARD HOLDINGS AG directly or indirectly holds participating interest of more than 50% or of which AUSTRIACARD HOLDINGS AG is otherwise authorized to directly or indirectly control the strategic economic conduct, regardless of the location of the companies' registered offices (hereinafter together referred to as "AUSTRIACARD" or "Group").

This Code must be observed by all staff members and employees of AUSTRIACARD. In addition, all persons acting for or providing services to AUSTRIACARD, as well as all its other business partners, are expected to apply rules and standards identical or similar to those set out in the Code.

Where local laws or regulations differ from our Code of Conduct, we have to make sure that we meet both standards.



1.3. Adoption of the Code of Conduct and dissemination

The Code of Conduct was adopted by AUSTRIACARD's Management Board and is valid for all employees and managers at all hierarchy levels worldwide and must be adhered to fully. The Code of Conduct can be downloaded on here:

<https://www.austriacard.com/governance>.

1.4. International principles

The Code of Conduct of AUSTRIACARD is based on internationally recognized standards and principles that promote ethical and responsible business conduct. These include:

The Fundamental Conventions of the International Labour Organization (ILO)

The United Nations Guiding Principles on Business and Human Rights (UNGPs)

The Universal Declaration of Human Rights (UDHR)

The OECD Guidelines for Multinational Enterprises

The Ten Principles of the United Nations Global Compact (AUSTRIACARD joined in February 2025)

These frameworks serve as the foundation for our global operations and our commitment to human rights, fair working conditions, and sustainable business practices.

1.5. Austrian Corporate Governance Code

The publicly listed company AUSTRIACARD HOLDINGS AG has committed itself to adhere to the Austrian Code of Corporate Governance (Österreichischer Corporate Governance Kodex¹).

2. Mutual Respect, Diversity, Health and Safety

At AUSTRIACARD, we are proud of the respectful and inclusive culture we foster—both within our teams and in our interactions with customers, partners, and stakeholders. We believe that every individual deserves to be treated with fairness, dignity, and appreciation, regardless of background or beliefs.

We do not tolerate any form of discrimination or bias—whether based on race, religion, gender, disability, worldview, or political opinion (as long as legally permitted). Likewise, harassment, bullying, or any form of verbal, physical, or non-verbal misconduct has no place in our organization.

¹<https://www.corporate-governance.at/kodex>

Our team is made up of talented individuals from diverse countries, cultures, and experiences. This diversity is one of our greatest strengths. By treating each other with courtesy and respect, we create an environment where everyone can thrive and contribute their best.

AUSTRIACARD is committed to fair and merit-based practices in hiring, promotion, training, and compensation. We value ability, dedication, and integrity—and we stand firmly against any form of harassment, whether in person, in writing, or online.

The way we treat each other and our business partners reflects who we are. That's why we expect all employees to engage with colleagues, customers, and stakeholders in a spirit of mutual respect and professionalism.

We also take health and safety seriously. AUSTRIACARD has clear procedures in place to protect the wellbeing of every employee. If you encounter unsafe conditions or risks, please report them immediately—your voice helps us maintain a safe and supportive workplace for all.

Together, through open communication, equal opportunity, and a shared commitment to respect and safety, we build a workplace where everyone feels welcome and empowered.

2.1. Human Rights and Child Labour

AUSTRIACARD adheres to the principles of human rights at all our business and production locations, and in particular resolutely oppose any form of child or forced labour. We expect the same of our business partners and suppliers. We respect the laws, regulations and rules of the countries

where we do business in and we act in line with international standards in relation to human rights (e.g. Fundamental Principles of the International Labour Organization), freedom of association, equal employment opportunities as well as prohibition of forced and compulsory labour.

AUSTRIACARD has a Global Human Rights and Labor Standards Policy in place and commits to the following:

United Nations Guiding Principles on Business and Human Rights (UNGPs)

Universal Declaration of Human Rights (UDHR)

Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises

Fundamental Conventions of the International Labour Organization (ILO)

United Nations Global Compact Principles

National and international labor and human rights regulations

3. Environmental Responsibility

At AUSTRIACARD we aim to promote environmentally friendly production practices and offer safe, sustainable products and solutions. We consider it part of our corporate responsibility to operate in an environmentally conscious manner.

At AUSTRIACARD, we are conscious of the environmental impact of our operations and aim to reduce resource consumption wherever feasible. Environmental and climate considerations are integrated into our innovation processes. We also encourage our suppliers to act responsibly and support environmental protection.

4. Quality and Product Safety

At AUSTRIACARD, we aim to create long-lasting value through safe, durable and innovative products, solutions and services. Our development efforts focus on improving quality and sustainability while contributing to environmental protection and enhancing people's quality of life.

We continuously refine our systems and processes, supported by a quality management approach.



5. Conflicts of interest

We conduct business transactions with the best interests of AUSTRIACARD in mind. We avoid all kinds of conflict of interest. A conflict of interest is when you are involved in something personally that could influence your work for AUSTRIACARD and makes it difficult for you to take decisions in the best interest of AUSTRIACARD. When you are working on behalf of AUSTRIACARD your decisions shall never be influenced by personal considerations or relationships.

AUSTRIACARD employees shall report any potential conflicts of interest so that AUSTRIACARD can determine whether a conflict exists or not. They will be advised of the proper actions to take in line with the rules issued by AUSTRIACARD and this Code of Conduct.

This is how you behave correctly:



Take no outside job that could conflict with your role at AUSTRIACARD, or work for a current or potential competitor, supplier or customer of AUSTRIACARD. Secondary employments have to be approved by AUSTRIACARD in writing. Secondary employment is any paid employment that is performed alongside your engagement with AUSTRIACARD. This also includes any work on a self-employed basis. Voluntary or charitable activities do not require approval as long as they are carried out without remuneration.



Report contract negotiations in which any of your family members are involved on the side of the business partner.



Do not acquire properties or shares of companies that AUSTRIACARD may have an interest in purchasing (with the exception of companies which are publicly listed on the stock market).



Do not act as a corporate director, officer or consultant of another company without the permission (this does not cover your involvement in any non-profit or charitable organizations).



Do not acquire or hold onto any interests in companies who are AUSTRIACARD's suppliers, customers, potential customers or competitors.

6. Business partners and suppliers

We show responsibility in the selection and cooperation with suppliers and business partners. Agreements with consultants, brokers, sponsors, agents or other intermediaries shall not be used to channel payments to any individual, public entity or client. How we do business is crucial to our reputation and success as well as to the business partners', who shall be seen and treated as allies.

We are fair in our relations with suppliers and we must not show any favor or preference to any person or business based on anything other than the best interest of AUSTRIACARD. Similarly, all purchases of goods and services for AUSTRIACARD must be made in accordance with company policies and this Code of Conduct.

All commissions and fees paid to agents and consultants must be reasonable in relation to the services provided. Employees must not agree or pay commissions or fees that could be considered to be improper payments. Agreements with consultants, brokers, sponsors, agents or other intermediaries shall not be used to channel payments to any person or persons, including public officials or employees of customers.

7. Anticorruption and Bribery

We compete vigorously on the market, but always in compliance with the relevant anti-bribery laws. We have zero tolerance for corrupt activities of any kind.

Non-compliance with anti-bribery legislation can have serious legal consequences for

AUSTRIACARD and the individuals involved. We neither take nor give bribes! It is also our policy to require all agents, consultants and partners who work on AUSTRIACARD's behalf to comply with these same laws and practices.

Further information can be found in the Anti-Bribery and Anti-Corruption Policy.

8. Sanctions and prevention of money laundering

We have to comply with all laws preventing money laundering and terrorist financing. We aim to conduct business only with reputable customers/suppliers and business partner involved in legitimate business activities, with funds derived from legitimate sources. AUSTRIACARD has a risk based "Know Your Customer" due diligence procedures in place and takes reasonable steps to prevent, detect and report suspicious transactions.

Business dealings with individuals or entities, trading in certain goods and technologies which are affected by sanctions or embargoes are permitted only if done in strict compliance with applicable sanctions and embargoes legislation. Each employee or consulate/agent is responsible to apply the respective rules in daily business.

9. Employee 's Commitment

Employees have to organize and manage their private spending and financial obligations in such a way, that they are within the framework of individual possibilities of income and wealth.

10. Competitors

We support free and fair competition by never becoming involved in price-fixing, market sharing or other anti-competitive practices.

AUSTRIACARD is committed to free and open competition on the market. It is better for everyone if every business is able to work openly without illegal or unfair restrictions. We believe every company should be able to trade and compete with AUSTRIACARD as they wish, as long as they follow all applicable laws and regulations. We remain resolved never to be involved in fixing prices artificially high or low, in the sharing of confidential information that gives another company an unfair advantage, or in any other unfair or restrictive business practice.

Infringements of competition laws do not only violate our own Code of Conduct; they can also result in large financial penalties, criminal charges and even prison sentences for the individuals involved.

11. Information Exchange, Personal Data, IP and AI

11.1. Information Exchange

Take care of the company's valuable property and safeguard confidential information.

As an employee of AUSTRIACARD, you'll often use computers, mobile phones, IT applications and other equipment and systems that are vital to the company. These valuables belong to the company, so use them and take care of them as you would your own personal possessions.

Confidential and sensitive information is also of great value to AUSTRIACARD. Examples include business plans, product specifications, technical details of methods and processes, client and customer lists, and financial information. It can harm AUSTRIACARD if confidential or sensitive information is shared with outsiders. Never use such confidential information for your personal gain.

Working for AUSTRIACARD means that you are in a position of trust. Treat any confidential or sensitive information you learn in your job with absolute confidentiality.

Furthermore, we do respect the company's assets and don't seek any personal advantages or personal gains through the use of AUSTRIACARD's proprietary information or of one's position in the company.

11.2. Personal Data and Banking secrecy

Personal data may only be collected, processed or used in as much as they are required for predefined, clear-cut and lawful purposes. A high standard is to be ensured in respect to data quality and the technical safeguarding of data against unauthorized access. The use of data must be transparent for the person concerned, and this individual's right to information and the correction of inaccurate data must be preserved, as well as the person's right to file objections, block access to the data or erase it, if necessary. The unauthorized use of data is not allowed.

Employees shall neither disclose nor utilize facts and other matters that have been entrusted or made accessible to the employee exclusively on the basis of business relationships with banks or payment service providers and their customers; this also applies to other persons working for the employer or on behalf of the employer, unless the information in question must be passed on in order to carry out a specific business transaction or work order (internal banking secrecy – need-to-know principle). These confidentiality obligations apply indefinitely, even after termination of the employment relationship.

11.3. Intellectual Property and Patents

Every employee must respect the legally effective intellectual property rights and trademark rights of third parties. No employee is permitted to gain unauthorized access to confidential information about a third party or to make use of this information. Patents, discoveries and specialized know-how are of immense importance to AUSTRIACARD. No employee is entitled, in

any form whatsoever, to convey information about new findings, company secrets or proprietary data to third parties. Any business materials, documents or data storage media must be protected against unauthorized use.

Any direct or indirect use of confidential business information in the course of employment or after the termination of an employment relationship for the personal advantage of an employee or a third party or to the detriment of AUSTRIACARD is forbidden.

11.4. Responsible Use of AI

We use AI-supported technologies responsibly, aligning with evolving legal and ethical standards—especially in data protection and cybersecurity. Fairness, transparency, and non-discrimination guide our approach. Human oversight remains essential, and the well-being and privacy of our employees and partners are always a priority.



12. Media and External Communication

Media contacts, press information, and public statements on the AUSTRIACARD Group are reserved for the Management Board and for persons explicitly authorized, in general or on an individual case basis.

Public media requests are to be forwarded without delay and without giving personal views or own information to the media.

In the case of private statements of opinion in the public, especially in connection with the company, AUSTRIACARD employees do not refer to their roles in the company, but clearly indicate that this is their private opinion only. This is especially important when communicating in social media.

13. Integrity and Transparency

At AUSTRIACARD we communicate truthfully and accurately in all our business dealings. We follow applicable standards for accounting, record keeping, and reporting—both financial and non-financial—to support transparency and accountability. This approach helps ensure appropriate tax practices and contributes to the early identification of potential risks, including financial irregularities.

14. Insider trading and market abuse

Violations related to insider trading and market manipulation may have severe consequences, including termination of employment as well as civil and/or criminal penalties, and they may have serious impacts on our reputation and the public's trust. Therefore, trading in securities of AUSTRIACARD HOLDINGS AG or any company, while in possession of material, non-public information regarding the company is prohibited. We do not tolerate any attempt to manipulate or tamper with the markets or the prices of financial instruments, benchmarks, or commodities.



15. Violations of the Code of Conduct and Whistleblowing

If you are not certain which laws or regulations apply to you and your place of employment, or how to apply the Code of Conduct in practice, please contact your Line Manager, the relevant legal department or the Local Management responsible for you.

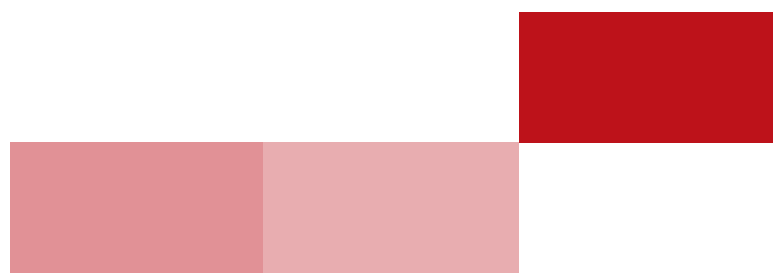
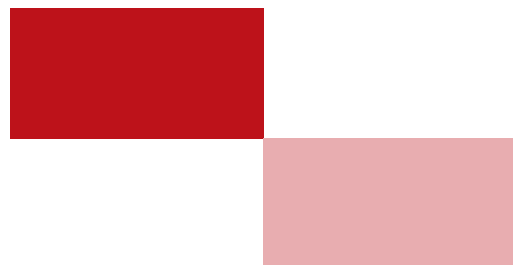
Due to the fact that the rules contained in the Code of Conduct apply to all employees of AUSTRIACARD group, any infringements or transgressions will be considered as a violation of this individual's employment responsibilities and duties, and could potentially have legal consequences in accordance with the stipulations of labour or civil laws.

AUSTRIACARD has established a whistleblowing system that enables employees and external stakeholders to report potential violations of laws, internal policies, or this Code of Conduct. Reports can be submitted confidentially via the Whistleblowing Reporting Channel.

Detailed information, including procedures and protections for whistleblowers, is outlined in the Group Whistleblowing Policy.

All reports are treated with strict confidentiality. Employees who report concerns in good faith are protected from any form of retaliation. AUSTRIACARD does not tolerate retaliation under any circumstances. It is the responsibility of every manager to foster a work environment in which concerns can be raised without fear.

If you are not certain which laws or regulations apply to you and your place of employment, or how to apply the Code of Conduct in practice, please contact your Line Manager, the relevant legal department or the Local Management responsible for you.



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info@austriacard.com
www.austriacard.com

