

Supplier Code of Conduct

This Code of Conduct applies to any person, company or other entity that supplies or provides a product or service (such company, a “Supplier”) to any company of the Kudelski Group (which includes any subsidiary or affiliate of Kudelski SA). We strongly encourage our Suppliers to promote the requirements of this Code within their own supply chain.

Key Principles

Ethics

The Kudelski Group is committed to conducting business legally and ethically. In the course of its dealings with the Kudelski Group, the Supplier should use its best efforts to act in an ethical manner and must comply with all applicable laws and regulations.

Corrupt arrangements with customers, suppliers, government officials or other third parties are strictly prohibited. Corruption, in any form, including bribes, kickbacks or lavish gifts and/or entertainment will not be tolerated.

Protection of Assets and Intellectual Property

The Supplier must respect any Non-Disclosure Agreements (NDAs) signed in the course of their work, including not only NDAs signed with the Kudelski Group but also NDAs signed with other parties, and must also respect the rights to and protection of patents, copyrights, trademarks and other intellectual property owned, controlled or licensed by the Kudelski Group.

The Supplier may not make public communications about the Kudelski Group without the Kudelski Group’s prior written consent.

Labor and Human Rights

Workplace Environment

The Kudelski Group is committed to respecting the health and safety of its employees and to providing them with an appropriate and safe work environment.

Similarly, we expect our Suppliers to provide their employees with safe and healthy working conditions. At a minimum, potable drinking water, adequate sanitation, fire exits and essential safety equipment, access to emergency medical care and appropriately equipped workstations must be provided. In addition, facilities must be constructed and maintained in accordance with the standards set by applicable codes and ordinances.

Non-Discrimination

The Supplier shall not discriminate in hiring and employment practices on the grounds of criteria such as race, color, religion, sex, age, physical ability, national origin, or sexual orientation.

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Labor and Wages

The Supplier must ensure that it complies with all applicable laws and mandatory industry standards pertaining to the number of hours and days worked by its employees.

The Supplier shall provide its employees with fair compensation and comply with all applicable wage laws, including but not limited to those relating to minimum wages and overtime pay.

The Supplier shall respect the right of free association of employees to join employee organizations or trade unions, as permitted under the local laws.

Prison and Forced Labor

The Supplier may not use or in any other way benefit from forced or compulsory labor or human trafficking. Likewise, the use of labor under any form of indentured servitude is prohibited, as is the use of physical punishment, confinement, threats of violence or other forms of harassment or abuse as a method of discipline or control of its employees.

The Supplier shall not utilize factories or production facilities that force work to be performed by unpaid or indentured laborers, nor shall the Supplier contract for the manufacture of products with subcontractors that engage in such practices or utilize such facilities.

Child Labor

The use of child labor by the Supplier is strictly prohibited. Child labor refers to work that is mentally, physically, socially, morally dangerous or harmful for children or improperly interferes with their schooling needs.

Supporting Local Communities

The Kudelski Group supports the local communities in which it operates by providing local employment opportunities and encouraging our employees to engage in local social initiatives and other community projects. We maintain close relationships with local universities and high schools on both the scientific and recruitment fronts and promote apprenticeship programs at our head office sites in Switzerland and the US.

We therefore value Suppliers that not only provide local employment but also that partner with local entities to improve the educational, cultural, economic and social well-being of the communities in which they live and serve.

Environment

The Kudelski Group aims to reduce our environmental footprint through various initiatives related to energy consumption and waste management. This includes use of renewable energy, measures to increase energy efficiency at our offices, promotion of public transportation and electric vehicles, efforts to increase recycling and waste reduction and use of digital means of communications to reduce travel.

We expect our Suppliers to achieve sustainable growth while managing the impacts of their business activities and reducing their own environmental footprint. Suppliers whose activities have an environmental impact shall have a structured and systematic approach to manage those environmental impacts, including where applicable air quality, energy consumption, water quality and consumption and waste management. We

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expect to have regular discussions with our Suppliers concerning the environmental impacts of their business activities for the Kudelski Group and the appropriate means to mitigate those impacts. We also encourage Suppliers to promote similar improvements further down its supply chain.

Reporting Concerns

If you have questions or need to report a possible violation of this Code, you are encouraged to work with your primary Kudelski Group contact. If that is not feasible or appropriate, you may contact the Kudelski Group at compliance@nagra.com.