



# ingenico

## Code of Ethics

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# About the Code

## The Ingenico Way



Our Code of Ethics (the “**Code**”) expresses the way that we behave and conduct business at Ingenico. It is fundamental to our mission to be the most trusted technology partner in the new world of payments acceptance and underpins our business strategy. The Code applies to all of us in Ingenico without exception, from our board of directors to our frontline support teams, both permanent and temporary, full time and part time, at our head office and in our regional offices.

The Code also sets the standards that we expect from our business partners such as suppliers, consultants, distributors and technology providers. They may have their own code of ethics, but we expect them to be no less ambitious in the standards they hold themselves accountable to than we do through our Code.

The principles expressed in the Code are further developed in specific policies on topics including anti-corruption, conflicts of interest, and whistleblowing.

Put simply, the Code is our Ingenico Way



# A Word from Our Executive Committee

Our ethics and our values

# A Word from our Executive Committee

Our ethics and our values

*“Our Code of Ethics reflects the robust ethical standards that we at Ingenico, collectively and individually, strive to demonstrate daily within our Ingenico culture based on the values of Trust, Innovation and Care”*

**Ingenico Executive Committee**



Our values



## Trust

We build trust across our organisation, our partners and clients.



## Innovation

We encourage innovation at any level, anywhere, any time.



## Care

We care about our colleagues, clients, environment and community to create a positive impact.





## We Work for a Better World

- Protecting the environment
- Promoting human rights



# We Work for a Better World

Protecting the environment | Promoting human rights



## Protecting the environment

We cherish the environment in which we live and work, and we recognise our role as a major business enterprise in protecting the environment. We take active steps to reduce our own carbon footprint, and encourage our employees, suppliers and other business partners to limit their own greenhouse gas emissions and to minimise their energy usage.

We incorporate eco-design principles into our products and solutions, increasing the use of sustainable materials and promoting the repairability and recycling of Ingenico products and solutions without compromising on safety and security. We work with our suppliers to guard against the use of conflict minerals in our products and components.



## Want to know more?

- [Modern Slavery Statement](#)
- [ethics@ingenico.com](mailto:ethics@ingenico.com)



## Promoting human rights

We commit to observing recognised global standards on human rights as they apply to our business, including the Universal Declaration of Human Rights and the OECD Guidelines for Multinational Enterprises.

Modern slavery is a crime and a serious violation of fundamental human rights. It can take various forms including slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of an individual's liberty to exploit them for personal or commercial gain. Ingenico supports the global fight against modern slavery, and actively works to guard against modern slavery in any form within Ingenico and within our supply chains. We are committed to transparency and publish an annual statement detailing the measures implemented to prevent modern slavery from taking place anywhere in the business or in any of our supply chains. Ingenico suppliers and business partners must ensure that they do not permit any form of modern slavery in their operations, including the use of child labour or forced, bonded or compulsory labour.



## What would you do?

If you are asked to do something that you think might be unlawful, unethical or against this Code, what should you do?

You hear or see something that you think might compromise the safety or security of our people or products, what should you do?

You witness what you think might be unethical practices taking place inside or in our supply chain, what should you do?

Someone mentions to you that they heard a rumour about underage worker in one of our supplier locations, what should you do?

Contact your manager, [Compliance](#), Human Resources, our Legal team or the [Ethics Hotline](#) to raise your concerns or seek guidance.

## We Take Responsibility

- Living the Code
- Whistleblowing – Speaking Up

# We Take Responsibility

## Living the Code | Speaking Up



Our Code reflects our values as a company and trusted technology partner, and our commitment to uncompromising ethical standards. The Code becomes real and meaningful when it is expressed in the day-to-day actions and decisions of every Ingenico team member. It is all of our responsibility to uphold the Code and to live by it. Managers and team leaders have a particular duty to ensure that the Code is communicated to all team members, to promote it through words and actions, and to model the Code in their own behaviour.



We actively encourage all members of the Ingenico community to speak up if you see something that you believe is against our Code or against the law - to become a whistleblower. Our whistleblower program provides multiple channels through which a whistleblower can report a concern, including our external reporting portal [ingenico.integrityline.com](https://ingenico.integrityline.com), and a dedicated email address [ethics@ingenico.com](mailto:ethics@ingenico.com).

Whistleblowers can also report concerns directly to members of the management team or to the compliance team.

Whistleblowers can lodge reports anonymously, in full confidence that their anonymity will be protected at all times unless and until they give permission for their identity to be disclosed. All whistleblower reports will be investigated under the control of the compliance team with the objective to gather objective evidence relevant to the reported issue, to establish the veracity of the report and to identify appropriate actions to be taken. No whistleblower will ever suffer disciplinary sanctions or other form of retaliation for reporting a concern in good faith, even if the report is not sustained after investigation.

There may be additional reporting channels and legal protections in some countries, according to local legislation. These are additional to the whistleblower rights and protections set out in the Ingenico [Whistleblowing Policy](#).



Speak up if:

- it doesn't follow this Code
- It doesn't abide by the law
- It erodes the trust placed in us
- It damages our brand
- If you hear or see it directly
- If you hear about it indirectly

If you are unsure, or simply want advice, Speak Up! The support you need is here for you!

Contact your manager, [Compliance](#), Human Resources, our Legal team or the [Ethics Hotline](#) to raise your concerns or seek guidance.



## How can I make a report?

- [ingenico.integrityline.com](https://ingenico.integrityline.com)
- [ethics@ingenico.com](mailto:ethics@ingenico.com)





## We Value Integrity at Work

- Employee rights
- Equal opportunity, diversity and inclusion
- Harassment
- Learning and development
- Working conditions
- Alcohol and drugs
- Freedom of expression

# We Value Integrity At Work

Integrity is based on respect



Want to know more?

➤ Contact your local HR team

We are committed to promoting and safe-guarding the physical and mental well-being of Ingenico employees.

Integrity is at the heart of our Code, and at the heart of the way that we work together.

Integrity means respecting one another, upholding the highest ethical standards in our day to day work, and holding each other to those high standards.

Respect is the foundation of our relationships, and our actions and behaviour are guided by honesty, trust, integrity and loyalty.

## Employee rights

We recognize the right of all employees to be treated with respect and dignity. We are committed to abiding by global standards that recognise the rights of employees, including the UN Guiding Principles on Business and Human Rights, the UN Global Compact, and International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

## Equal opportunity, diversity and inclusion

We celebrate diversity and inclusion as a central pillar of our culture. Inclusion is grounded in a culture of mutual understanding and respect, and a desire to empower every team member as a valued contributor. We recognise that diverse and inclusive teams unlock creativity and innovation, promote harmony and improved morale, and are good business practice.

**AT INGENICO, WE STRIVE TO PROMOTE A SAFE WORK ENVIRONMENT ENABLING EVERYONE TO FLOURISH, WELCOMING & VALUING THE POSITIVE IMPACT RESULTING FROM OUR DIVERSITY**

Equality of opportunity is essential to a diverse and inclusive workplace. We provide equal opportunities for employment, training, development and promotion to all employees based only on qualifications, skills and experience that are relevant to the job. We do not discriminate against anyone on grounds of gender, age, race, ethnicity, national origin, citizenship, religion, disability, sexual orientation, marital status, genetic information or any other protected characteristic.

## Harassment

Every Ingenico team member has the right to a secure, safe and supportive working environment, free from any form of intimidation or harassment, including physical, sexual, psychological, verbal or moral harassment. There is no place within Ingenico for offensive, abusive or other unwanted behaviour, which violates the dignity of any person, or which creates an intimidating, hostile or humiliating atmosphere.



# We Value Integrity At Work

Integrity is based on respect

## Working conditions

We are committed to a working environment that supports employees' physical and mental health and safety in accordance with all applicable laws relating to working conditions, including in particular minimum working age, maximum working hours and weekly rest periods. We support employees whether working on Ingenico premises, from home, or on third party premises.

We respect the right of all employees to receive fair remuneration and are committed to ensuring that every employee receives at least the minimum wage and any benefits required by applicable laws and regulations.

## Freedom of expression

We recognise and respect the right of employees to express themselves freely in a respectful and professional manner, to set up or join a union, and to be represented by representative bodies in communications between the management and employees.

Employees are free to have their own political opinions and to join a political party of their choice. However, no contributions may be made on behalf of Ingenico to government officials, political parties or candidates, and Ingenico premises and resources may not be used for political purposes. Ingenico values the opportunities provided by the digital economy, but does not tolerate disrespectful or abusive use of social media.

## Learning & development

A learning culture fosters the personal growth of employees and adds value to the business. We encourage all employees to take advantage of learning opportunities, whether provided by Ingenico or by external learning providers, for their personal and professional development.

Ingenico provides mandatory training programs on core topics that are central to Ingenico's business, including ethics, security and data privacy. Employees must complete all mandatory training assigned to them including annual refresher training.



What would you do?

You witness harassment, or discrimination or a colleague acting without integrity, how do you report it?  
Who do you turn to?

If you just want to talk about something that you are unsure of, or simply want advice on, don't hesitate to contact your manager, Compliance, Human Resources, our Legal team or the Ethics Hotline to raise your concerns.

## Alcohol and drugs

We recognise that alcohol and other drugs can impair judgement, and can put both ourselves and others at risk in a work situation. All employees are prohibited from taking or being under the influence of an illegal substance while working on behalf of Ingenico, and must ensure that the use of alcohol, other drugs or prescription or over-the-counter medications does not impair their ability to perform their job. It is absolutely forbidden to be in the possession of illicit substances on Ingenico premises.

On occasions, alcohol may be provided at some company functions with the approval of senior management. In these situations it is important to use good judgement and to ensure that we act respectfully towards one another and only drink in moderation.



## We Protect Our Company

- Confidential information
- Use of illegal software
- Business continuity
- Conflicts of interest
- Protecting our assets



# We Protect Our Company

By protecting information and assets



Want to know more?

- [Information Security Policy](#)
- [ethics@ingenico.com](mailto:ethics@ingenico.com)



## Confidential information

We respect and protect the confidentiality of information with which Ingenico is entrusted, whether it is our own information or that of our customers. We act in good faith at all times, and exercise good judgement in handling confidential information on a need-to-know basis in accordance with our internal rules and policies.

We are especially vigilant when it comes to the protection of personal data in our possession, recognising that a breach of data privacy controls would have serious legal and reputational consequences for Ingenico not to mention the risk of adverse consequences for the subject of that data. We follow sound data protection principles including fairness, lawfulness and transparency, and abide by national and international rules in the handling of personal data.



## Use of illegal software

We take steps to ensure that software used within Ingenico is correctly licensed and is used in compliance with the licence terms. We don't use illegal or unlicensed copies of commercially available software, nor use, exchange or store illegal software on our systems. We don't install any tools that could be used for hacking on Ingenico's network or workstations unless there is a valid business justification and authorization from the security team; this includes products such as password crackers, port scanners, peer-to-peer tools, file sharing tools, and packet sniffers.



## Business continuity

As an essential service provider in the payments market and financial services sector, Ingenico has a responsibility to ensure business continuity for our stakeholders, including our customers, and of course for our own business objectives. We take steps to ensure that our service operations are resilient in the face of foreseeable risks, and embed business continuity practices into our everyday operations.



## How do I help protect our assets?

- You can help protect our Company by being vigilant and reporting any data protection or software concerns. If you see it, report it!
- Ask for help if you are unsure by contacting our IT, Security, [Compliance](#) or legal teams who will help.

# We Protect Our Company

By protecting information and assets



## Conflicts of interest

Conflicts of interest arise when our personal interests are in conflict with the legitimate business interests of Ingenico, and can arise at any level of the organisation.

A conflict of interests may affect our judgement or ability to act in the best interests of the company. Our personal interests or obligations should never be in conflict or interfere with the company's business activities, and we must avoid such conflicts wherever possible and always act for the company's benefit.

Transparency is essential in managing actual or perceived conflicts of interest. Conflicts of interest cannot always be avoided but they must always be declared in accordance with our Conflicts of Interest policy so that appropriate mitigation measures can be put in place.

**Concealing or failing to declare a conflict of interest is a major breach of our Code**



## How do I know if I am conflicted?

Examples of potential conflicts of interest can include:

- Outside employment, including self-employment, especially with an Ingenico supplier, partner or competitor.
- Having a financial interest, whether directly or indirectly, in an Ingenico supplier, partner or competitor. An indirect interest would include a financial interest of a close family member.
- Having a personal obligation to an Ingenico supplier, partner or competitor.

Ask for help if you are unsure by contacting our Compliance or legal teams who will help.



## Want to know more?

➤ [ethics@ingenico.com](mailto:ethics@ingenico.com)



# We Protect Our Company

By protecting information and assets



## Protecting our assets

Assets are the tools, information and resources that we use in our work at Ingenico, and include physical, financial and information assets.

Physical assets are things like buildings, furniture, tools, and supplies. We treat our physical assets with care and help safeguard them from being lost, stolen or damaged. If any physical assets are defective, unsafe or in need of repair, please inform your manager or the Ingenico real estate team.

Financial assets are Ingenico's funds and bank accounts, and the use of those funds for investments and ongoing expenditure.

Information assets include our computer systems and networks and devices such as laptops and mobile phones, as well as the information that is stored and processed in those systems. As a leading payment technology company we rely on intellectual property – our technical and business know-how – for our success and continued growth.

Protecting the company's assets is essential for the continued success of the company, and each of us has a role to play in protecting those assets. All types of asset are important, but information assets are particularly vulnerable to security risks, including cyber threats. We employ a suite of information security measures to protect our information assets and each of us has a vital role to play in keeping our information systems safe.



## How do I help protect our assets?

You can help protect our assets by:

- ✓ Maintain strong and secret passwords
- ✓ Be vigilant against suspicious emails
- ✓ Never install unapproved software
- ✓ Never connect unauthorised hardware to the Ingenico network
- ✓ Always check before you click!

Ask for help if you are unsure by contacting our IT, Security, Compliance or legal teams who will help.



## Want to know more?

- Information Security Policy
- ethics@ingenico.com

# We Do What is Right

- Ethical business practices
- Bribery and corruption
- Gifts and hospitality
- Money laundering and terrorism financing
- Fraud
- Compliance with laws
- Export controls and sanctions
- Tax evasion
- Fair competition



# We Do What is Right



Want to know more?

- [Compliance Manual](#)
- [ethics@ingenico.com](mailto:ethics@ingenico.com)



## Ethical business practices

Our commitment to observing ethical business practices is central to our way of doing. As an organisation, and as individuals, we are judged by our actions – what we choose to do or not do.

We apply business ethics at all levels of the company. We stand by our commitments to customers, our stakeholders and to each other. If we do fall short or make mistakes we take ownership and accountability for our shortcomings and seek to learn from them. We are committed to observing the laws, regulations and community standards of the countries in which we operate, and underpin that commitment through the Code itself, through training and communication, and through strong internal compliance and audit functions.

Ethical business practices – doing the right thing – is inherent within our values and our behaviours at Ingenico.



## How do I know what is “right”?

Refer to this Code and use good judgement. Always ask if you are unsure or if you simply want to check something, or seek specific advice.

Be vigilant! Ask questions! Accept nothing less than our Code!

If you see it, report it at [ingenico.integrityline.com](https://ingenico.integrityline.com).

Contact our human resources, [Compliance team](#) or legal teams for guidance.



## Bribery and corruption

We have zero tolerance for any form of bribery or corruption. In addition to the need to follow the law, our rejection of corruption has important business benefits, including maintaining our corporate reputation and retaining the confidence of customers and third parties with whom we do business.

Bribery involves soliciting, offering or accepting anything of value to gain an improper business advantage. Bribery corrupts both the giver of the bribe and the recipient, and undermines legitimate business. Particular care needs to be taken in dealings or activities involving government entities or public officials, but it is important to remember that bribery can also impact private entities, organizations and individuals.



## Gifts and hospitality

Small gifts can be appropriate in the business context to help strengthen relationships and demonstrate respect, but must never distort normal business judgement. We do not offer or accept gifts or hospitality that may influence, or appear to influence decision-making either by ourselves or by the other party. We do not permit gifts or hospitality to be offered to, or received from, a public official or a representative of a public or state-owned organization.

We ensure transparency by declaring all gifts and hospitality, with arms-length approval of any exceptions to our gifts and hospitality guidelines.

# We Do What is Right



## Compliance with laws

We place great importance on the principle that business should be conducted both profitably and responsibly. As a trusted technology partner, and to protect our reputation, we conduct business in full compliance with applicable international, national and local laws and regulations and local rules. It is therefore our duty to be familiar with and to comply with the legislation governing our activities.

We must not, at any time, participate in activities that are, or could be perceived as, illegal.



## Money laundering and terrorism financing

Money laundering is the process by which criminals disguise the origins of money obtained by passing it through a complex sequence of transfers or transactions. Money laundering is often linked with the diversion of funds to finance terrorism.

Although Ingenico does not process financial transactions, as a key technology provider in the payment value chain, Ingenico has clear responsibilities to support the fight against money laundering and the financing of terrorism. We must take all necessary measures to reduce the risk that Ingenico's products and services might be used for money laundering and terrorism financing purposes, and to report any such concerns to the responsible authorities.



## Want to know more?

- [Compliance Manual](#)
- [ethics@ingenico.com](mailto:ethics@ingenico.com)



## Fraud

Fraudulent behaviour is completely counter to our standards as Ingenico. We do not engage in or tolerate any form of fraud. Fraud can take many forms, including misappropriation of resources, manipulation of data or assets, intentional omissions, or changes in financial reporting. Giving incorrect information to a customer or partner in order to secure a contract could constitute a fraudulent act and lead to the imposition of penalties on Ingenico, as well as civil or criminal proceeding.

Besides being illegal, fraud is a fundamental breach of faith with our commitment of integrity to each other, to our customers, to our business partners and to the communities in which we operate.



## How do I know what is “right”?

Use good judgement, refer to this Code, and ask yourself:

- Are all the policies and processes being followed?
- Is all the information correct, complete and not been modified?
- Am I being pressured into doing something that I think is unethical, unfair or illegal?

Ask for help if you are unsure by contacting our [Compliance team](#) or legal team who will help.





# We Do What is Right



## Export controls and sanctions

Export controls are restrictions imposed by national or international laws and regulations on the export of sensitive technologies to certain countries, in the interests of national security. Controls apply not only to weapons technology, but also to dual-use goods, including software, which could be used for military as well as commercial purposes. We ensure that the required licenses are provided for all controlled goods and that we know the final destination of goods.

We respect official sanctions that restrict dealings with identified individuals, entities and countries, whether these are imposed at a global level through the UN or by an individual government. We screen third parties with whom we deal to avoid breaching or undermining international sanctions.



## Fair competition

We always act in line with competition law. This means that we treat our partners with respect, do not take unfair advantage, and do not directly or indirectly exchange information with competitors on prices, terms and conditions, volumes, market shares or clients. We do not fix prices or collude with competitors on procurement conditions or take part in any other practice that could unfairly restrict competition.



## Tax evasion

As a good corporate citizen, Ingenico is committed to complying with all applicable tax laws and to not doing business with third parties who adopt unlawful tax practices. We have in place processes and controls to protect against tax evasion, which are implemented by local finance, tax and legal teams.



## How do I know what is “right”?



### Want to know more?

- [Anti-corruption Policy](#)
- [ethics@ingenico.com](mailto:ethics@ingenico.com)

Use good judgement, refer to this Code, and ask yourself:

- Are all the checks completed?
- Are all the policies and processes being followed?
- Am I being pressured into doing something that I think is unethical, unfair or illegal?

Ask for help if you are unsure by contacting our [Compliance team](#) or legal team who will help.



# Our Business Partners



## Working with third parties

We choose to work with suppliers, subcontractors and other business partners who are aligned with our values and ethical standards as expressed in our Code of Ethics. Business partners are part of the Ingenico ecosystem, and participate in the delivery of services in-line with highest ethical and sustainability standards. We conduct due diligence on our business partners, and preferentially select those who respect the law, do not engage in unethical, fraudulent or corrupt practices, do not use or accept child or forced labour, do not practice or permit any psychological or physical coercion, and who respect individual and collective liberties and comply with labour laws in the recruitment and employment of their personnel.

Ingenico places a high priority on corporate social responsibility, and encourages its business partners to be assessed by a reputable agency for its Environmental, Social and Governance (ESG) performance at least every second year against an acceptable benchmark agreed with Ingenico.



## Ingenico's expectations

We expect our business partners to comply with both the letter and the spirit of Ingenico's Code and to apply the principles of our Code in their business operations. We also expect them to fully observe the laws and regulations of the countries in which they operate, and to require the same standards of their own suppliers and subcontractors.

Ingenico expects its business partners to notify Ingenico if they become aware of any suspected violation of our Code, or if they believe they will be unable to comply with their obligations, and to agree a corrective action plan with Ingenico to address any such shortfalls.

Compliance with the principles set out in the Ingenico Code of Ethics is a condition of engagement between Ingenico and its business partners, and unaddressed non-compliance may be a breach of contractual obligations that could entail consequences including termination of the business partner's contract with Ingenico in serious cases.



# Resources

## Useful reference material



### Ethics or corruption concerns

[ingenico.integrityline.com](https://ingenico.integrityline.com)

[compliance@ingenico.com](mailto:compliance@ingenico.com)

[ethics@ingenico.com](mailto:ethics@ingenico.com)



### Links for further information

[Global Slavery Index](#)

[ILO Declaration on Fundamental Principles and Rights at Work](#)

[OECD Anti-Corruption & Integrity Hub](#)

[Transparency International](#)

[UN Guiding Principles on Business and Human Rights](#)

[UN Global Compact](#)



### Policies and Other Useful Documents

[Ethics & Conduct Compliance Manual](#) incorporating:

Anti-Corruption Policy  
 Gifts and Hospitality Policy  
 Conflict of Interest Policy  
 Whistleblowing Policy  
 Compliance Due Diligence Policy, and  
 Human Rights Policy

[Information Security Policy](#)

[Ingenico Modern Slavery Statement](#)



# Code of Ethics

## Contact



Thank you for your attention.

For more information contact

[compliance@ingenico.com](mailto:compliance@ingenico.com)