

# DAON SUPPLIER CODE OF CONDUCT

Updated: 22 April 2026

Daon is a global leader in identity proofing and verification solutions, dedicated to playing a vital role in ensuring trust and security in the digital world. Our mission is to provide innovative, sustainable, and socially responsible solutions to assist organizations worldwide verify, authenticate, and secure identities.

As a trusted partner in the identity proofing and verification industry, we have a clear purpose: Enabling secure identities for a connected world, now and for future generations. We take this responsibility seriously and are committed to upholding the highest ethical and sustainability standards. Our purpose serves as our guiding principle in all our operations.

We strive to conduct business with suppliers who share our commitment to operating in a responsible and ethical manner. In addition to the responsibilities outlined herein, suppliers must comply with all applicable laws, legal regulations, directives, and guidelines as well as all obligations in any contract a supplier may have with Daon.

## The Supplier Code of Conduct

The Supplier Code of Conduct has been developed to provide clarity on the principles that Daon follows in its procurement policy concerning sustainable procurement and ethical business conduct. Our suppliers are expected to conduct their business activities in the same ethical, fair, and environmentally responsible manner across their entire value chain. Daon requires its suppliers to adhere to this Code of Conduct, understanding that non-compliance may harm their relationship with Daon.

### **Ethical Business Practices**

Suppliers will conduct their business practices in an ethical manner and act with integrity towards:

#### ***Fair competition***

Suppliers shall conduct their business using fair business practices, consistent with fair competition, truth in marketing, and anti-trust laws. Supplier shall be in compliance with all applicable laws, rules, and regulations that prohibit restriction of competition.

#### ***Reporting unethical behavior***

Suppliers shall have a means for employees to report any grievances anonymously and shall encourage workers to report any concerns or illegal activities relating to their workplace without threat of retaliation, intimidation, or harassment. Suppliers shall monitor, investigate, and take corrective action where needed. Documentation and records of reported cases shall be maintained in accordance with applicable record retention policies and/or laws.

#### ***Privacy***

Suppliers will protect the personal information/personal data of any employees, customers, or third- or fourth parties of Daon they do business with.

#### ***Preventing conflicts of interest***

Suppliers will avoid the appearance of conflicts of interest in working with Daon and shall not allow personal or family interests to influence any business dealings with us. Suppliers will have policies and financial controls in place to prevent conflicts of interest affecting procurement and financial decision-making.

### ***Anti-bribery and corruption***

Suppliers will not offer any form of bribery, corruption, extortion, payoff or embezzlement; will not make illegal payments (directly or indirectly); will not conduct business with entities involved in herein prohibited activities; and will have policies in place to monitor and enforce the compliance with anti-corruption laws.

### **Collaboration and Procurement**

Daon utilizes advanced systems for procurement activities and collaboration with suppliers. To engage in business with Daon, suppliers are required to have an account within our designated system to undergo Daon's supplier due diligence process and ensure streamlined communication and efficiency.

### **Environmental Sustainability**

Daon strives to optimize its resource use and minimize the environmental impact across its value chain. We expect our suppliers to demonstrate a clear understanding of the environmental risks, impacts, and responsibilities associated with the products and services they provide as well. Suppliers must comply with all applicable regulatory requirements regarding the environment, and should maintain an environmental, health and safety management system which supports and proves compliance with such regulatory requirements.

### **Human Rights Responsibility**

Daon is committed to creating and maintaining a work environment where everyone can work, learn, and recommend ideas in a climate of mutual respect that is free of harassment and discrimination. Suppliers are expected to do the same. Furthermore, Daon expects its suppliers to recognize and address human rights-related risks in their business operations. Suppliers should implement measures to mitigate these risks and provide transparency on the impacts in these areas, along with an effective complaints mechanism.

### ***Forced labour***

Suppliers shall not use any form of forced, bonded, or involuntary labour and must comply with all applicable employment legislation in all the countries where the suppliers' business is present regarding employee terms and conditions, including pay.

### ***Child labour***

Suppliers shall not use child labour below the age of 16 or the applicable minimum legal age, whichever is higher.

### ***Fair treatment***

Inhumane treatment and/or physical punishment of workers is strictly prohibited. Suppliers shall not permit harassment or abuse of any kind.

### ***Non-discrimination, diversity and inclusion***

Suppliers will not permit discrimination in screening, hiring, training, promotion, compensation, or any other employment practice based on race, colour, age, sex, gender identity, gender expression, sexual orientation, ethnicity, national origin, genetic information, medical condition, pregnancy, disability, caste, religion, political affiliation, union membership, marital status, covered veteran status or any additional illegally discriminatory characteristic.

### ***Wages and fringe benefits***

Work hours, minimum wages, and overtime hours paid to employees as well as any fringe benefits, must be compliant with applicable regulations. Wages should be paid at regular intervals with reasonable frequency.

### ***Freedom of association***

Suppliers should encourage their employees to communicate with their superiors concerning working conditions, compensation, etc. without fear of intimidation or harassment. Employees should be permitted to associate freely, bargain collectively, and seek representation in accordance with local laws.

### **Health and Safety**

Suppliers must provide a safe and healthy working environment. Suppliers should have resources responsible for defining, implementing and monitoring related policies and management systems that include compliance with local and national regulations. The health and safety elements should, at a minimum, include:

#### ***Workers' health and protection***

Suppliers shall protect workers from unsafe working conditions such as exposure to physical or environmental hazards in the workplace.

#### ***Maintenance, emergency preparedness, and response***

Suppliers shall have programs in place to operate and maintain all operations in the safest manner possible. Suppliers shall identify, assess, and track possible emergency situations in the workplace and minimize their impact by implementing emergency response plans and procedures.

#### ***On-site work***

Suppliers with access to Daon facilities will comply with all applicable policies and procedures applicable to those facilities.

### **Protection of Daon Information**

At Daon, protecting confidential and sensitive information is of highest importance. Inappropriate use or disclosure of information can cause serious harm to our company, customers, business partners, and suppliers.

#### ***Protect confidential information***

Suppliers must sign a Non-Disclosure Agreement before any Daon proprietary or sensitive information is shared and must ensure measures to keep the information protected from disclosure. Suppliers must take precautions to safeguard this information, including that its personnel are adequately trained.

#### ***Data privacy & security***

Suppliers must comply with all applicable data privacy and security laws and regulations. Suppliers must maintain appropriate procedures, safeguards, and controls to secure and protect the confidentiality, integrity, and availability of confidential information, including personal information, received from, processed on behalf of, or disclosed by Daon.

### **Internal Management Systems**

Suppliers are expected to implement internal management systems with executive level commitment and accountability to ensure adherence to, and continual improvement and compliance with, these principles.

### ***Maintain documentation and records***

Suppliers are expected to maintain adequate documentation and records to demonstrate that they are compliant to this Code of Conduct, as well as all applicable laws and regulations. Data prepared for Daon or maintained on behalf of Daon must be accurate, complete, and retained in accordance with applicable legal and regulatory data retention requirements, or as otherwise specified in a relevant agreement between the supplier and Daon.

### **Stakeholder Feedback**

Suppliers should establish an effective complaints mechanism, both internally and externally, to address current impacts on stakeholders. This includes having a dedicated channel for complaints and continuous monitoring of their status. Suppliers are expected to document processes for managing environmental, social, and governance risks within their organizations and inform Daon about identified risks and their actual impact.

### **Positive Impact Commitment**

Based on the understanding of the aforementioned risks, suppliers should take necessary measures to prevent or address negative impacts on people and the environment within their own operations and supply chains. In the event that negative impacts occur, suppliers must actively seek solutions.

### **Reporting**

Suppliers are encouraged to report violations or any potential violations of this Code to Daon by sending an email to [etpm@daon.com](mailto:etpm@daon.com).

Failure to comply with this Supplier Code of Conduct, the contract with Daon, or any applicable laws and regulations, may result in the termination of any agreement between the supplier and Daon.

### **Partnering for a Better Future**

In addition to meeting international standards, Daon is open to collaborating with suppliers to make a more significant impact on society and the identity verification industry. This may involve additional requirements aligned with our Company's purpose and strategy. Suppliers are encouraged to proactively engage in this collaborative process.

By adhering to this Supplier Code of Conduct, we aim to foster a responsible and sustainable ecosystem in the identity proofing and verification industry, contributing to the security and trustworthiness of digital identities worldwide. We appreciate your commitment to these principles and look forward to a productive partnership.

Approved

### **This statement has been approved by Daon**

This statement was approved by Martin Walsh, Chief Legal Counsel on 17 March 2025 and signed by Doug Swope as CISO. It will be reviewed and re-issued on an annual basis and made available on our website.

Signed for and on behalf of Daon



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Doug Swope  
CISO