



DeLaRue

Our *code*
of business
principles

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Welcome

De La Rue's purpose is securing trust between people, businesses and governments. In order to do this, it is essential that we maintain the highest ethical standards in the conduct of our business, are honest and transparent and always act with integrity.

We must all take responsibility for maintaining the trust of our colleagues, customers, and the communities in which we work by complying with all applicable laws and group policies, living our company Values and adhering to this Code of Business Principles. Please take the time to read and understand this code, which outlines our core commitments and describes the standards and behaviours we expect of our employees and business partners.

The code cannot cover every situation which may arise, and you must also be prepared to use good judgement and apply common sense in deciding the right actions to take. You should ask questions if you are unclear about any aspect, or if you are unsure how to respond to an issue that this code does not address.

If you see actions or behaviours which are not consistent with this code, it is vital that you have the courage to speak up about your concerns and we will support you if you do so. We must never compromise our integrity to achieve business results.

Clive Vacher
Chief Executive Officer



Who is our code for and why do we have one?

Our code applies to all De La Rue employees. All contractors, joint-venture partners and representatives of De La Rue worldwide must also be made aware of the terms of the code and are expected to abide by them. The code forms the basis of the Supplier Code of Conduct which all suppliers are expected to adhere to.

We are all required to read, understand and follow this code and all related policies. We must also be aware of, and without exception follow, the laws and regulations of the countries where we work and do business.

The purpose of the code is to outline De La Rue's core commitments, what they mean to you and how they should be implemented at all levels within the company.

You must promptly report any known or suspected breach of the code or related policies.

Any failure to comply with this code or its related policies will be treated seriously, fully investigated and appropriate action will be taken. This may include further training or disciplinary action up to and including termination of employment, depending on the circumstances.

People manager responsibilities

We all have an active responsibility to live our Values and follow the code but we expect our people managers to create a culture that enables success whilst ensuring business is conducted in the right way as outlined in our People Managers' Charter. You must set a good example and provide guidance and support to enable your team to understand both the spirit of this code and how the code and related policies are to be applied in practice.

You should

- Live our Values and stand up for what is right
- Follow the expected behaviours in the People Managers' Charter
- Be familiar with the code and our policies and ensure your team is too
- Set expectations by acting as a role model and praising the right behaviours
- Hold your team accountable for following the code
- Encourage and support people to share concerns
- Provide guidance and support once a concern is reported
- Ensure that business targets are never used to justify avoiding commitments under the code
- Ensure there is no act or threat of retaliation for colleagues reporting concerns

We don't expect anyone to know all the answers so support and advice is available to everyone, regardless of role, seniority or experience. Contact the HR, Ethics or Legal teams who will be able to help.

Doing the right thing

It is our personal responsibility to ensure that the company's business is conducted in absolute compliance with applicable laws and company policies.

Do the right thing.

Use this decision guide to help you:



Where to find advice or raise a concern

You have a responsibility to raise a concern if you believe part of the code has been or is being breached. You should also seek advice if you're not sure about any part of the code or related policies. Seeing something that falls below our high ethical standards can be a worrying experience. You can access confidential support and information at any time in a number of ways. You can approach whoever you are comfortable talking to.

Ethics Champions

Each site or region has at least one nominated Ethics Champion. Posters and local communications will help you identify them. You can talk to any Ethics Champion if something you've seen or experienced is bothering you from an ethical perspective. They can discuss your concerns confidentially and help you decide what to do next and if you both agree can escalate your concern to a senior manager or to the Group Ethics Director for advice or investigation.

Ethics Champions also help us keep the code visible and high profile in all our sites, for example by making sure posters and other materials are up to date. Ethics Champions take on this role alongside their existing job.

Your line manager or any senior manager or director

Managers are responsible for helping their teams understand the code and how to apply it and can guide and support you if you have a concern.

A member of the Human Resources, Ethics or Legal team

You can contact the Ethics, HR or Legal teams with any concerns you may have.

CodeLine

De La Rue CodeLine is our whistleblowing service operated by an independent, third party, available 24/7. You can make a report online or by telephone and this can be anonymous if you wish. You can select your preferred language and then provide details of the incident such as when and where the events took place. It helps us investigate an issue if you provide details of your name when you make a report. However, if you wish to remain anonymous then the CodeLine online portal or telephone service provides this option. CodeLine contact details are included in this booklet and on posters displayed at all sites. The information is also available on SharePoint for colleagues with access to De La Rue's network.

What happens once I've reported a concern via CodeLine?

The information you provide will be sent to the Group Ethics Director and General Counsel and they will decide on the most appropriate course of action. Senior company representatives not involved in the incident, or external investigators if more appropriate, will be appointed to carry out an independent investigation and information is not shared with anyone else. All ethical concerns reported to the Group Ethics Director and investigated are reviewed by the Ethics Committee of the Board of Directors of De La Rue plc. You will be advised of the progress and outcome of any investigation, although it may not be possible to give you full details if the matter is sensitive or there are legal or regulatory restrictions.

Support for you

Your concerns will be taken seriously and investigated quickly. If a breach of this code or any relevant laws or policies is proven, appropriate action will be taken. You will not be penalised for reporting your concerns and we will ensure you are protected. Any act or threat of retaliation will be considered a serious breach of this code and must be reported. However, if you knowingly make a false allegation or provide false information in bad faith you will be subject to disciplinary action. There are specific grievance procedures available if your concern is related to a human resources issue.

Speak up if something doesn't feel right.

Our people

We treat everyone in an ethical and respectful way, looking after ourselves and our colleagues and protecting human rights within the business, our wider supply chain and the communities in which we work

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Health, safety and wellbeing

We prioritise the health, safety and wellbeing of our employees

We all have a responsibility for our own and each other's health, safety and wellbeing at work. This applies to both our physical health, mental health and wellbeing.

It is important to understand and follow the health and safety procedures where you work, whether it is a manufacturing site, or in an office or elsewhere. Always ask if you are unsure.

We must make sure that we understand and follow safety requirements when we are visiting another location, whether it belongs to De La Rue or to a contractor, supplier or customer.

If you have a safety or security concern you should report it on a My Concern Report, available at all sites.

All near misses and accidental injuries at work must be reported to your line manager who will review them and pass them on to the HSE or Security teams, as appropriate.

If your concerns relate to wellbeing please talk to your manager or HR who can signpost you to appropriate support.

Your role and responsibilities

- Take responsibility for health, safety and wellbeing, don't leave it to someone else
- Never put yourself or others at risk
- Remember that health and safety is relevant wherever you are
- Suggest any improvements that you feel could be made to managing health, safety and wellbeing
- If you see or suspect unsafe working practices, report them
- Be aware of the help and support available for employees including services such as occupational health and Mental Health First Aiders

Where to go for help

- Site HSE Advisor, HSE Security and Risk Manager or the Global HSE Manager
- Health and safety information on site noticeboards
- For mental health and/or wellbeing advice speak to your line manager, HR contact or other local support such as a Mental Health First Aider who will provide advice and information for further support
- See the relevant policies listed on page 39 for further information

Scenarios

The team is under pressure to meet tight customer delivery deadlines and we are sometimes cutting corners with our safety protocols. We really need to get this job finished to meet our targets – is this OK?

Safety procedures must never be compromised however tight the deadlines. You should raise your concerns with your line manager or site HSSE manager without delay.

I am feeling very stressed at the moment and am finding my workload unmanageable. I don't know what to do.

It's important to safeguard your health at work, so speak to your manager; they can help you assess your workload and priorities and help to manage the factors that are contributing to your stress. You can also get support and advice from your Human Resources team. The earlier you raise a concern the quicker the business can support with finding a solution.

My colleague has recently not seemed quite right and is behaving unusually. I know they are having some difficulties at home, and I have tried talking to them about it but they told me there isn't a problem. I am concerned about them. Should I tell someone?

You should discuss the issue with your line manager or the HR team. Your colleague may be unwell, suffering from mental health issues or possibly misusing substances such as medicines, drugs or alcohol to cope with challenging issues. If you are concerned that your colleague's wellbeing, or the quality and safety of their work is being compromised it is likely that they need help and support in dealing with their difficulties.

Fairness and respect

We promote an inclusive culture that values diversity and ensure that everyone is treated fairly

Treating our employees fairly and in accordance with our Values is key to De La Rue's success and provides the foundation for the kind of environment we all want to work in. We believe in treating our colleagues, suppliers, customers and the communities in which we work in an ethical and respectful way. We are committed to ensuring all employees work in an environment that is free from harassment and intimidation.

We recognise the value of diversity and actively seek to have a diverse workforce. We are personally and collectively responsible for creating an inclusive environment and expect everyone to commit to this.

We treat our employees equitably and value and respect each other's views, opinions and beliefs. We do not tolerate discrimination on the grounds of any aspect of individuality including gender, gender identity, age, sexual orientation, religion or belief, colour, nationality, national origin, disability, marital status, or trade union affiliation.

We have a zero-tolerance approach to bullying and harassment.

Your role and responsibilities

- Recruit and promote on the basis of a person's ability, experience, behaviour, work performance and level of potential in relation to the needs of the role
- Encourage the continuous development of skills and abilities for all
- Always lead by example, behaving with honesty, courtesy, consideration, respect and dignity
- Seek to understand and embrace differences
- Support and encourage diversity in all its forms
- Speak up if you see behaviours in person or online which are not acceptable, including bullying and harassment

Where to go for help

- HR teams
- Ethics Champions
- See the relevant policies listed on page 39 for further information

Scenarios

My manager is pushing the team hard to deliver quality work, but we all find their approach very intimidating which is badly affecting morale. Is there anything I can do about it?

Managers are expected to challenge and drive teams to deliver great quality work which may sometimes involve having difficult conversations. However, they are also expected to treat team members with respect and act with sensitivity. If you feel that you or someone else is not being treated in a professional manner, you should try and speak to your manager. You can also consult your HR team. A good working environment can only exist with the support and involvement of us all.

What should I do if I hear a negative comment about someone's sexual orientation during a meeting or in an informal work context, such as at the coffee machine or in a breakout area?

This kind of behaviour is unacceptable and you should challenge it if you feel able to. Speak to your Line Manager or local HR Manager. If you do not feel comfortable doing this, then use CodeLine.

I have been asked to manage a project which needs to be completed quickly and the project team may need to work overtime to meet the deadline. Some members of the team are parents and therefore have childcare commitments so I am planning to ask people without children to join the project team. Is this OK?

You must be careful not to make assumptions. Speak to the whole team and ask who is able to support the project. Both parents and non-parents may have commitments outside of work or may be able to work out of hours and welcome the opportunity to be involved. Diversity makes us more innovative, helps to prevent group think and ensures we get the best result for the project and the business.

Human rights and modern slavery

We are committed to protecting human rights within our business and in our wider supply chain

De La Rue fully supports the principles set out in the UN Declaration of Human Rights, the United Nations Global Compact and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

We provide fair working conditions to all employees, regardless of their position in the company. We treat all employees fairly and honestly, providing them with written particulars of their employment, paying wages that reflect equal pay for equal work, the local markets and conditions and meeting the national minimum wage requirements. We comply with national regulations on working hours.

We comply with national and other applicable laws and regulations concerning an individual's freedom of association without fear of reprisal, intimidation or harassment.

We respect the right of our employees to choose freely to join or not join a trade union or similar external representative organisation.

We are committed to preventing slavery and human trafficking in our operations and in our supply chain.

We will not employ illegal child labour, forced or bonded labour or condone illegal child labour.

Your role and responsibilities

- Ensure that anyone who works for or with De La Rue does so freely and is safe from abuse
- Speak up if you suspect that the human rights of anyone connected to our business are being abused

Where to go for help

- HR teams
- Group Ethics Director
- See the relevant policies listed on page 39 for further information

Scenario

I have heard a rumour that one of our suppliers is under investigation following allegations of forced labour. Should I take any action?

Yes, De La Rue's terms and conditions of business include suppliers complying with human rights legislation and we should investigate. In case of severe non-compliance with our standards which we do not think we can fix immediately or if the supplier does not improve, we must end the relationship.

Our business standards

We maintain trust by always complying with the law and demonstrating complete integrity in the way we behave towards our customers, colleagues and business partners

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Environmental sustainability

We are committed to behaving in an environmentally responsible manner

Playing our part in the fight against climate change is crucial to help secure a sustainable future for everyone and we must behave in a way that minimises our impact on the environment. As well as being the right thing to do for the planet, it makes good commercial sense and our customers, investors and the communities in which we operate require us to demonstrate clearly our sustainability credentials.

Our role and responsibilities

- Understand and follow all our environmental policies
- Promote environmental sustainability whenever possible
- Report anything you believe may be in contravention of our policies

Where to go for help

- Site HSE Advisor
- Global HSE Manager
- See the relevant policies listed on page 39 for further information

Scenarios

I think I've seen something going on at my site which could be harming the local environment. Should I tell someone?

Tell your manager or the HSE Advisor at your site what you've seen as soon as possible. As well as causing damage to the environment and impacting the community, the issue might put us in breach of environmental legislation and also damage our reputation.

There is a problem with the pollution monitoring device on a piece of manufacturing equipment and it will take a week to get a replacement part to fix it. The equipment is critical to our manufacturing process and we have a backlog in production. Do we have to stop using the machine?

We must not run the machine without the required pollution controls – our commitment to environmental good practice must take precedence. You should consult with site management to find a solution.

Bribery and corruption

We prohibit any form of bribery, including facilitation payments

A bribe is an offer, promise, or provision of something of value to assist in obtaining or retaining business or securing an improper advantage either personally or for De La Rue.

Corruption is any unlawful or improper behaviour that seeks to gain an advantage through illegitimate means. Bribery, abuse of power, extortion, fraud, deception, collusion, cartels, and money laundering are all forms of corruption.

Bribery and corruption are illegal and damage communities, individuals and our commercial interests.

We prohibit any form of bribery, including facilitation payments (also known as kickbacks) and must never offer, pay, seek, accept or encourage bribes. This includes gifts, hospitality and entertainment or charitable donations or sponsorship which could be perceived as a bribe. We expect exactly the same behaviours from our business partners and must ensure that they understand our zero-tolerance policy.

Your role and responsibilities

- Never offer, request or accept anything of value which you suspect is intended to improperly influence a business decision
- Be cautious about offering or accepting gifts, hospitality or entertainment, which may present a bribery risk. Ensure that they are authorised and properly recorded on the De La Rue gift register which is accessible via SharePoint
- Seek advice before agreeing to any charitable donations or sponsorship requested by or related to a customer or third party
- Ensure that business partners, customers and suppliers are aware of our anti-bribery and corruption commitments
- Remember that local customs are never an excuse for bribery, they are still unacceptable and illegal
- If you face a situation where money, or something of value, is being demanded and your health, safety or wellbeing is at risk, pay, get yourself to safety and immediately report to your manager and the Legal or Risk teams.

Where to go for help

- Speak to someone in the Legal or Ethics teams
- See the relevant policies listed on page 39 for further information

Scenarios

I need a visa to be able to visit a customer's country. The visit has been requested by this important customer at short notice and an official at the embassy has said they can speed up the process if I make a \$50 cash payment. Is this OK?

This sounds like a facilitation payment which is a form of bribery and is illegal. You should not take up this offer and must report it to the Legal or Ethics team. If there is a publicly available official fast-track system you may use that but if in any doubt, check with the Legal team for advice.

I cannot travel to a customer territory and we urgently need to use an intermediary to attend a customer meeting at the Ministry of Finance. There isn't time to go through the De La Rue onboarding and approval process but he has been highly recommended by the customer. We will pay the intermediary if he helps us secure a contract. As it's business critical, can I go ahead?

You must not engage an intermediary without completing all due diligence and approvals processes which are designed to identify and manage red flags, protect the business from anti-bribery and corruption risk, and include detailed provisions for the structure of fee payments to sales consultants. The Ethics team can advise you of the correct process to follow.

Gifts and hospitality

We can offer and accept only modest and appropriate gifts and hospitality

Giving or exchanging gifts and hospitality can often help develop business relationships, but wrongly handled may give the appearance of bribery. We must make sure that gifts or hospitality never influence business decision-making processes or cause the perception that influence is being exercised. Anyone intending to offer a gift or hospitality must ensure that this is done within the company guidelines.

Different cultures place different importance on gift-giving. We should understand and respect local customs and laws, avoid situations that could cause embarrassment and immediately report anything that falls outside the company guidelines.

De La Rue encourages supporting charities and community activities, but we must be cautious that any donations or sponsorship are properly handled. They should not be linked to sensitive commercial activities such as when business decisions are being made by a customer.

Your role and responsibilities

- Ensure that any gifts or entertainment are authorised in line with our Gifts and Hospitality Policy in advance of being offered
- Always notify your line manager in writing of any gifts or entertainment received
- All gifts, entertainment, and hospitality (given or received) with a value of £100 or more must be added to the gift register which can be accessed from the SharePoint home page
- If giving a gift, something showing the De La Rue logo is preferable to an anonymous item
- Gifts or hospitality must be modest and appropriate and should never influence business decision-making processes or cause the perception of influence
- Remember that there are some types of gifts that are never acceptable, including cash or payments to, or for the benefit of, individuals
- Make sure that all proposed charitable donations and sponsorship are approved in accordance with our policies

Where to go for help

- Speak to the Ethics team
- See the relevant policies listed on page 39 for further information

Scenarios

A customer has asked De La Rue to make a donation to a charity as part of our imminent bid. I have done some research and the charity looks legitimate, so can we do this?

Even if this is a legitimate charity, any donation which is linked to a bid or made at a time when a business decision is being made could be seen as a bribe. De La Rue should decline to make the donation.

I've been sent a high value gift by a supplier and don't want to cause offence by returning it. What should I do?

It is important that you notify your line manager and seek guidance from the Ethics or Legal team. Ideally you should decline and return the gift. If this is not possible it should be recorded on the gift register and donated to charity.

A customer is insisting that their husband accompanies them on a visit to one of De La Rue's production facilities in the UK at De La Rue's expense. The contract provides that De La Rue will pay for one representative from the organisation to attend a training event. Can I go ahead and book and pay for flights and hotels for them both?

You should politely explain that we are unable to pay for their husband's travel and accommodation and they will need to cover those costs. Contracts should be clearly written to ensure that there can be no perception of bribery or excessive gifts and hospitality being offered.

Fair competition

We are committed to competing in an open and fair manner and comply with all competition and anti-trust laws

Competition and anti-trust laws support and encourage competition in business, ensure fair treatment for all parties, and provide protection for our customers. They prevent companies from entering into anti-competitive agreements with each other or from taking unfair advantage of a dominant position.

Agreeing prices with competitors, dividing market share and rigging bids are examples of activities that limit competition and are illegal, even if, for example, you propose to agree to increase prices marginally amongst all known competitors.

We must only seek to win business through lawful means and must not enter into agreements and understandings that are anti-competitive.

If we have a dominant or monopoly position in a market, we must ensure that we do not use that position to keep competitors out, or to take advantage of customers.

If you find yourself in a position where you might meet competitors either formally or informally, such as at a trade fair or bid opening, and you are in doubt as to what you can and cannot discuss, take advice from the Legal team. Remember that a tacit or unspoken understanding, apparently co-ordinated behaviour or written agreement could all form the basis for an unlawful, anti-competitive arrangement.

Your role and responsibilities

- Promote De La Rue's products and services on their merits to customers rather than through unfair criticism of competitors' offerings
- Make sure that you understand and follow De La Rue policies when you enter situations where you might meet a competitor
- Never share commercially sensitive information with competitors, including pricing, bidding intentions, volumes, or market sharing
- Report any incidents or suspected incidents of anti-competitive behaviour to the Legal team
- Leave any meeting where anti-competitive discussions take place or where a competitor seeks to initiate such a discussion, making sure that your leaving is recorded in the minutes (or make a detailed note yourself), and inform the Legal team

Where to go for help

- Contact the Legal team
- See the relevant policies listed on page 39 for further information

Scenarios

I was catching up socially with an ex-colleague who now works for a competitor. I mentioned that De La Rue was submitting a bid for a particular customer, but it wasn't a key target for us. He said that his company was in the same position. On reflection I am wondering if I should have mentioned it.

You should never discuss a bid with a competitor even if very few details are disclosed as it could impact competition and put us in breach of anti-trust legislation. You should discuss the situation with the Legal team.

At an industry conference last week I attended a scheduled technical forum meeting with counterparts from our competitor companies. At the end of the day, one of the participants suggested that the group should go to the bar for a more informal conversation over a drink. I declined as I had to get home. Would it have been better for me to attend to see what I could find out?

All interactions with competitors must be very carefully handled and conversations must be limited to non-specific, non-sensitive, non-strategic topics. If during official meetings with competitors you realise that sensitive issues are about to be discussed, you should leave the meeting and ensure that the fact you left is recorded in the minutes. You should report the situation to the Legal team. Informal contact and social events should be avoided but if an event agenda includes a social gathering, employees may attend but ensure that conversations are restricted to non-specific, non-sensitive, non-strategic matters, and leave if discussions stray into these areas.

Conflicts of interest

We will not allow personal or family interests to influence our professional judgement or activities

We must ensure that when taking work-related decisions we do not put our personal interests before the best interests of De La Rue.

Relationships with third parties such as customers, consultants, suppliers and competitors should be conducted in a professional, impartial and competitive way. Due to the nature of our business with government customers, we must be particularly mindful of business dealings with anyone who holds, or has recently held, a government position.

Conflicts of interest may take many different forms and we must use our good judgement to identify them but some examples are:

- Financial or family interests in competitors, suppliers or other business partners
- Hiring, managing or supervising a relative or partner
- Awarding business to a close associate

Your role and responsibilities

- Avoid relationships or activities which could give rise to a conflict of interests
- Do not use your position at De La Rue for personal benefit or to benefit a family member, friend or associate
- Declare any conflict or potential conflict to your line manager and the HR team so the situation can be managed
- Remove yourself from any decision-making process where there is a conflict of interest
- All business decisions must be transparent and open and in the best interests of De La Rue
- Never accept gifts or entertainment if you suspect that they are intended to secure an improper advantage

Where to go for help

- Speak to the Legal or HR teams
- See the relevant policies listed on page 39 for further information

Scenarios

My brother-in-law has just applied for a job in the same team as me. Is this a conflict of interest?

Family relationships are not automatically a conflict of interest. It depends on whether either of you are in a position to influence future opportunities or benefits the other receives. You should disclose the situation as a potential conflict of interest and should not be involved in the interview or decision-making process. If your brother-in-law is successful, depending on both your roles, it may be necessary to take mitigating actions to manage any conflict of interest.

I am keen to run for a political position in my local community, is this OK?

You should speak with your local HR team to discuss the nature of the proposed position before running for or accepting any politically-connected position. This is to ensure that there are no actual or potential conflicts of interest with your role at De La Rue or there could be a perception of a conflict which could cause reputational damage to the business.

I have recently discovered that two of my team members are in a romantic relationship. As their manager I don't think it's a problem but is there anything I need to do?

Whilst we must respect our employees' private lives we need to be mindful of their professional relationship. For example, if they are on the same shift and subject to dual control or if one reports to the other or has authority over them there could be a security or fraud risk to the business. There would also be a conflict of interest as they could not be expected to judge them objectively. You should discuss with the HR team, and Security team where appropriate, for advice on how to manage the situation sensitively.

Fraud, tax evasion and money laundering

We will not falsify records, misrepresent facts, evade the payment of taxes or help others to evade tax

Fraud, tax evasion and money laundering are serious offences under a variety of laws around the world, including the UK Criminal Finances Act 2017, and can result in the criminal prosecution of individuals and/or De La Rue. We must never make a false or deliberately misleading entry in a report, record or expense claim or falsify any corporate record, and must act at all times in accordance with our policies, controls and governance standards to protect ourselves and De La Rue.

Your role and responsibilities

- Accurately record all financial and other matters
- Ensure that any irregularities are immediately notified
- Preserve documents and records in accordance with applicable legal requirements
- Follow all customer due diligence controls impacting your activities
- Demonstrate integrity in submitting expenses
- Only accept and raise invoices and other contractual documents which are true to our agreed commercial situation and which do not include false information
- Do not undertake any action or activity which is intended to assist anyone else engaging in tax evasion

Where to go for help

- Legal team
- Group Director of Tax and Treasury
- Group Financial Controller
- See the relevant policies listed on page 39 for further information

Scenarios

I think a colleague is claiming expenses for travel which is not work-related. What should I do?

You should report your concerns to your manager in the first instance or use the guidance on page 7.

I overheard a colleague's conversation with a supplier, and they were talking about the supplier invoicing for a service that they don't provide. Should I report my suspicions?

You are right to be concerned and should immediately report the matter using the guidance on raising a concern on page 7.

A supplier has asked to change some invoices this month so they can categorise the supplies differently for tax reasons. They are a key supplier so should I agree to this?

You must not agree to this as you could be facilitating tax evasion which may result in a criminal prosecution for both De La Rue and you in addition to any that the supplier may face. Politely ask them to raise invoices with the correct amounts and descriptions of the supplies that have been made.

Sanctions

We must comply with all applicable sanctions laws

There are various sanctions regimes around the world which we must be aware of and comply with. These laws prevent us from dealing with certain people, companies, countries, and regions. Breaching sanctions laws has very serious consequences for the business and the individuals involved.

Sanctions rules may prevent payments being made to or received from organisations, companies or individuals in various countries as our banks may be unable or unwilling to process them.

Your role and responsibilities

- Know which countries are considered high risk for sanctions
- Consult with the Legal and Treasury teams before considering, evaluating or making any commitment relating to tenders or opportunities in a high risk country
- If you are in any doubt about sanctions requirements, contact the Legal team

Where to go for help

- Legal team
- Commercial teams
- See the relevant policies listed on page 39 for further information

Scenario

I think a potential business partner I am talking to may be connected to a high risk sanctions area. I am a US national. Where can I get advice on high risk jurisdictions and are there any requirements I am expected to follow?

You should cease any discussions and correspondence with your contact until you have taken advice from the Legal team. De La Rue must not breach international sanctions regimes. In addition, because US sanctions legislation is the most far reaching regime and it applies to all US persons, including Green Card holders and dual nationals wherever located, you should consult with the Legal team before having any involvement with high risk jurisdictions.

Our information

We protect our information and assets and use them responsibly

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Records and reports

We will ensure that our records and reports are accurate and true

Inaccurate or false records can have serious implications for the business, both financially and reputationally. As well as destroying trust and affecting commercial decisions, using false information to enhance business results or production performance may breach laws and regulations. We must maintain accurate, honest, and transparent records of our business dealings and ask for advice if we are unsure about records or reports we are preparing. If we see any records that we do not believe to be correct or suspect that they may have been designed to mislead the reader, we should report it.

Your role and responsibilities

- Ensure that all financial, production, inspection, quality, testing and other records and reports that you prepare are accurate and true to the best of your knowledge.
- Protect information and records from unauthorised access
- Report any incidents or suspected incidents of false reporting or record keeping

Where to go for help

- The Legal team
- See the relevant policies listed on page 39 for further information

Scenarios

We are very close to hitting our annual production targets but it will be a day or two after year end before they are achieved. It is really important to the business that we hit the numbers on time so I have been asked by my manager to change the figures submitted to head office. I'm not comfortable with this, is it OK?

No. Misreporting numbers could have very serious consequences for the business both financially and reputationally. All records must be accurate and true. It is never right to change them.

I have been asked to check the sales report prepared by my manager for the divisional leadership team. I have spotted what I think is an error, which nobody else seems to have picked up on. Should I mention it? I am worried that doing so might negatively affect my relationship with my manager.

If you do not mention this, you are not acting in the best interests of De La Rue. You should talk to your manager about what you have found. They have no reason to be angry with you as you will be performing the control check which is part of your job and therefore avoiding the reporting of inaccurate and misleading information, which might be used to make important business decisions.

Protecting personal information

We will protect personal information and comply with all applicable data protection laws

In the course of its business, De La Rue collects, holds, uses and discloses (where appropriate) a certain amount of personal information (for example, personal information about its employees, customers and business partners). De La Rue may also engage third parties to do this on its behalf.

Personal information is information that relates to an identified or identifiable individual. Certain personal information known as “special category personal information” has stronger legal protection.

We must protect all personal information, and apply special care to handling special category personal information.

All personal information must be collected, held, used and disclosed in a way that is secure and compliant with applicable data protection laws. What data protection laws apply will depend on the context and we should always ensure that we understand and abide by the legal and security requirements applicable to the personal information concerned.

Your role and responsibilities

- Follow De La Rue data protection policies and procedures
- Consult your line manager, the HR or the Legal team if you are unsure about collecting, holding, using or disclosing personal information
- Consult the Information Security team to discuss the applicable security requirements
- Consult the Legal and Information Security teams when engaging or dealing with third parties who will collect, hold, use or disclose personal information on De La Rue’s behalf
- Do not share on social media any work-related personal information which has come into your possession through your role at De La Rue
- Take particular care that you cannot be overheard when discussing personal information, or that it cannot be seen on your screen if being accessed on a device

Where to go for help

- The Legal team
- Head of Information Security and Assurance
- See the relevant policies listed on page 39 for further information

Scenarios

We held a charity event at our site and a photographer took lots of pictures. Is it OK to share them on social media?

You must be very careful when sharing any personal information, including photos, on social media. You should ask permission from the person concerned before doing so.

I work in a UK based function and have been asked to share employee details with a colleague in a non-UK site. Am I allowed to do this?

The answer will depend on the exact scenario but check with the Legal team or HR first. If the colleague has a specific and legitimate reason for needing the employee information then, depending on what Legal/HR says it could be shared securely but you must ensure that your colleague does not keep the information once it is no longer required.

I was queuing in the canteen at work and heard a manager from another team discussing the reasons for a colleague's long term sickness absence and details about their illness. I know the person and it made me feel uncomfortable overhearing something so personal, and I'm not sure it's right.

We must not share any personal information with anyone (including your team) without ensuring we have legal and ethical grounds to do so and should be mindful of who may overhear what we say. The HR or Legal teams should be consulted before disclosing any personal information. In this case, the manager may mean well but it is likely that their behaviour breached both the relevant De La Rue policies and privacy laws. If you overhear anything which raises an unauthorised personal information disclosure concern, you should contact the HR team to make them aware of the situation so it can be appropriately handled.

Confidential information and information security

We protect the confidential information we hold, including data from customers, suppliers and other business partners

There are many kinds of confidential information, for example business plans, financial information, pricing policies, costs, agreements, trade secrets and technical know-how.

In the course of business, De La Rue will routinely share certain confidential information with, or receive it from, third parties such as De La Rue's customers, suppliers, employees, competitors and other business partners.

We must identify confidential information and protect it. If we intend to share it with a third party, we must first put in place an appropriate non-disclosure agreement with them. We must apply special care when dealing with our competitors.

If a third party shares any confidential information with us, we must follow the rules set out in a non-disclosure agreement between them and De La Rue, and must only share confidential information internally or externally to the extent that we are permitted to.

Your role and responsibilities

- Ensure that confidentiality/non-disclosure agreements are in place with third parties if confidential information is to be shared with, or received from, them
- Consult the Legal team if you are not sure whether information is confidential, or whether you have permission to share it internally or externally
- Comply with De La Rue's information security and data classification policies at all times including selection of the correct data classification
- Take particular care when discussing confidential information and someone could overhear the conversation or when it is being accessed on a mobile device and someone could see it on screen
- Never share confidential business information publicly, for example on social media
- Refer any enquiries from the media to the Group Strategy and Marketing Director

Where to go for help

- The Legal team
- Head of Information Security and Assurance
- See the relevant policies listed on page 39 for further information

Scenarios

Someone who used to work for a De La Rue competitor has recently joined my team. They obviously have a great deal of knowledge about their business which would be very helpful to us. How long do we have to wait until they are able to share that knowledge with us?

There is no time limit on protecting confidential information. Your colleague should have been hired on the basis of their skills, not because of information about their previous employer. They must never be pressured to pass on confidential information.

I need to work on an urgent proposal but am travelling back from a customer visit so will need to deal with it at the airport before I board the plane. If it's critical for the business is this OK even if it is in a public place?

You should make sure that you are in a place where no one can see your computer screen or overhear any conversation you may need to have on the phone. Delay any conversation until you are somewhere you can speak freely and if you regularly need to work with confidential information when travelling, make sure you have a privacy screen for your laptop – the IT team can help with this.

Market abuse and insider trading

We will not disclose or misuse confidential or 'inside' information

You must not disclose any confidential information except where you are properly required to do so as part of your employment or duties. This means that you should not share that confidential information with family, friends or business acquaintances. Confidential information should not be shared with colleagues unless they need to be aware of that information for the proper purposes of their employment or duties.

There is a special category of confidential information known as 'inside information'. This is information that: (1) relates, directly or indirectly, to one or more companies or to the shares of those companies; (2) has not been made public; (3) is precise; and (4) if it were made public, would be likely to have a significant effect on the price of the company's shares.

Misusing inside information may amount to a market abuse offence. There are four categories of these:

- Unlawfully disclosing inside information
- Engaging, or attempting to engage, in insider dealing
- Recommending that another person engage in insider dealing or inducing another person to engage in insider dealing
- Market manipulation and attempted market manipulation

There is also a separate criminal offence of insider dealing. This is where you buy or sell shares in De La Rue or any other company based on inside information, or encourage anyone else to do so.

Your role and responsibilities

- If you are told by De La Rue that you are named on a 'confidentiality list' then you must not deal in De La Rue shares without first receiving written confirmation of clearance to deal. You will be notified and asked to acknowledge that you are on a confidentiality list.
- If you have access to inside information or have been told by De La Rue that you are named on an 'insider list' then you must not deal in De La Rue shares, or the shares of any other company to which the inside information relates. You will be notified and asked to acknowledge that you are on an insider list.
- Don't disclose any confidential information unless you are properly required to do so
- Seek advice from the Company Secretarial team if you are not sure whether information is confidential or amounts to inside information, or whether share dealing restrictions apply
- If you become aware of any suspected incidents of market abuse or insider dealing, report them at once to the Company Secretary

Where to go for help

- The Company Secretarial team
- See the relevant policies listed on page 39 for further information

Scenario

My father told me that he is going to sell his De La Rue shares. I have been involved in a large and important bid which I have just heard we have won and when this is announced, it should have a positive impact on the share price. Is it OK to suggest that he might want to wait a few days before selling?

You should never disclose information about our business which is not publicly available. If the news of the contract win amounts to 'inside information' then you would be committing an offence by telling him, and he would be committing an offence by timing his dealing on the basis of that information.

Our values

Our Values are a framework of common behaviours that underpin how we work with each other and with our external stakeholders. They help us make the right decisions in the right way. Every one of our employees plays their own, vital part in helping us achieve our objectives, deliver on our promises and create a culture we are proud of.



There are a number of policies which underpin our Code of Business Principles which include those listed below. They are available on the SharePoint site, or from your HR team.

Our people

Fairness and respect
Human Rights Policy Statement
Inclusivity
Modern Slavery and Human Trafficking Policy
Stress Management
Group HSE Sustainability Policy Statement

Our business standards

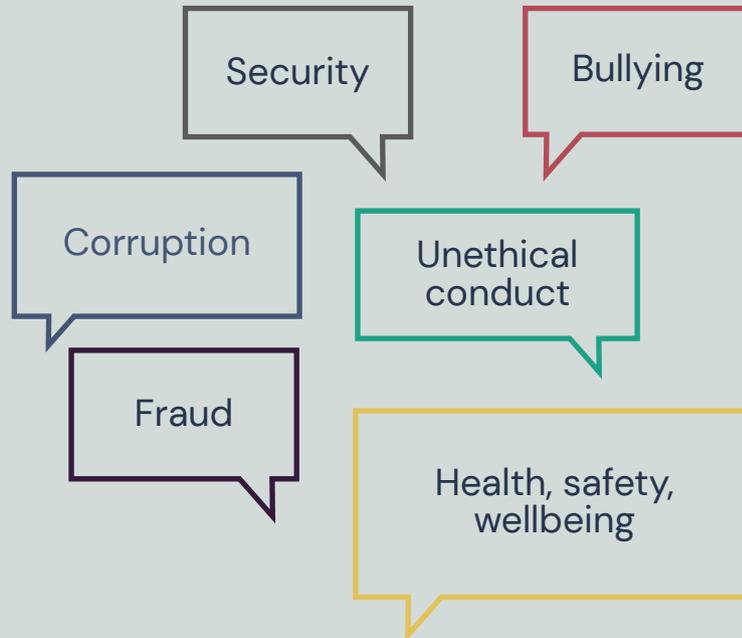
Anti-bribery and corruption
Competition and anti-trust
Conflicts of interest
Expenses
Fraud
Gifts and hospitality
Prevention of tax evasion
Recruitment of Politically Exposed Persons
Sanctions
Supplier Code of Conduct

Our information

Acceptable Use of Information Systems Policy
Data protection
Document retention
Group Baseline Security Manual
Group-wide Confidential Information and Dealing Policy
Operational delegation of authority
Securities Dealing Code
Social Media Policy

December 2022

Speak Up!



To raise a concern

- Report to a manager or HR, or
- Speak to an Ethics Champion, or
- Contact CodeLine

UK freephone number 0800 915 1571
From outside the UK +44 191 516 7749
Online www.safecall.co.uk/report

CodeLine is operated independently by Safecall with the option to remain anonymous.

