



CORPORATE COMPLIANCE:

**ANTI-SLAVERY AND HUMAN
TRAFFICKING POLICY**

Document Information		
Title	Global Data Privacy Policy	Version: Final
Owner	Chief Compliance Officer	
Purpose	To establish and communicate guidelines for data privacy.	
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Usage	This document is confidential.	

Version	Date	Author	Description
0.1	August 2019	Phong Quach	Final Policy
0.2	January 2018	Jessica Fehr	Minor Updates
0.3	May 2020	Stephanie Heyman	Revised Policy

I. INTRODUCTION

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, child labor, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. OneSpan International Inc. and its affiliates ("OneSpan"), consistent with its' Code of Conduct and Ethics, strives to act ethically and with integrity in all our business dealings and relationships.

1.2 OneSpan is committed to implementing and following controls to help prevent modern slavery from occurring within OneSpan's business or supply chain. For itself and for its supply chain, OneSpan expects the same conscientious efforts in preventing forced labor and human trafficking. In our manufacturing supply chain, our suppliers certify annually against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for OneSpan or on its behalf in any capacity, including OneSpan employees, contractors, consultants and temporary employees, officers or directors, third-party representatives and business partners (for ease of reference throughout this Policy, "Employees and Partners").

2. RESPONSIBILITY FOR THE POLICY

OneSpan's board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Chief Compliance Officer and the legal department has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries, and reviewing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

3. COMPLIANCE WITH THE POLICY

3.1 All Employees and Partners should review and comply with this policy. The prevention, detection and reporting of modern slavery in any part of OneSpan business is the responsibility of all those working for OneSpan or under OneSpan's control.

3.2 Employees and Partners are encouraged to notify OneSpan of any breach or suspected breach of this policy as well as raise concerns about any issue or suspicion of modern slavery related to OneSpan. Employees and Partners should notify their manager and OneSpan's Chief Compliance Officer promptly if they believe or suspect that a conflict with this policy has occurred, or may occur in the future. If unsure about whether a particular act, the treatment of workers more generally, or workers working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, Employees and Partners should raise it with their manager or the Chief Compliance Officer.

4. RETALIATION

OneSpan encourages openness and will support those who raises genuine concerns in good faith under this policy, even if the Employees or Partners turn out to be mistaken. OneSpan is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of OneSpan's business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should promptly inform the Chief Compliance Officer.

5. COMMUNICATION AND AWARENESS OF THIS POLICY

Communication of this policy, and on the risk our business faces from modern slavery in its supply chains, will be made available to Employees and Partners through introducing contract provisions and posting notices internally within OneSpan.

6. BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct unless specifically prohibited under applicable law. OneSpan may terminate its relationship with other individuals and organizations working on OneSpan's behalf if they breach this policy.