



**CORPORATE COMPLIANCE:**

**HUMAN RIGHTS POLICY**

Document Information		
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Owner	Chief Compliance Officer	
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Version	Date	Author	Description
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# ONESPAN CORPORATE COMPLIANCE - GLOBAL HUMAN RIGHTS POLICY

## I. INTRODUCTION

Human rights are basic rights, freedoms and treatment standards recognized by most governments, individual and businesses globally as belonging to all humans by virtue of being human. OneSpan is committed to upholding and respecting the human rights of all people and complying with all legal requirements thereto. Through our product and service offerings OneSpan secures our customers global digital journey from first engagement through the transaction lifecycle with our suite of verified identity, intelligent fraud detection and secure account opening products and services. Securing financial transactions and customer identities as well as preventing financial fraud protects and promotes economic opportunity and development for all persons.

This policy confirms OneSpan's long-standing commitment to uphold and respect human rights for all people and reflects essential standards for business conduct and human rights, risk mitigation and the promotion of fundamental human rights. This policy is informed by the [Universal Declaration of Human Rights](#), [Eight Core Labour Conventions](#) developed by the International Labour Organization ("ILO"), and the [UN Guiding Principles on Business and Human Rights](#) (the Guiding Principles) and the OECB Guidelines for Multinational Enterprises.

## 2. SCOPE OF POLICY

This policy applies to all OneSpan employees, contractors, consultants and officers working for or with OneSpan Inc. and its affiliated entities (hereinafter collectively referred to as "OneSpan").

## 3. POLICY OVERVIEW

The recognition and respect of human rights is of paramount importance and OneSpan commits to support and promote human rights. We recognize our responsibility to respect human rights and avoid complicity in human rights abuses, as addressed in the resources listed in the Introduction. Additionally, consistent with our commitment to respect ILO core labour standards, among other standards, we respect freedom of association and collective bargaining. We support the elimination of all forms of forced or compulsory labour, the effective abolition of child labour and the elimination of discrimination in respect of employment and occupation.

Our code of conduct as well as various other policies referenced in this Policy supports our commitment to respect human rights, including setting out:

- Our expectations on diversity and inclusion, equal opportunity and freedom from abuse or harassment in the workplace. We want to create and maintain a workplace that is free of harassment, intimidation, inhumane treatment, and discrimination based on race, colour, national origin, religion, gender, age, sexual orientation, gender identity, marital status, disability, or any other characteristic protected by applicable laws.
- We have zero tolerance for retaliation, which includes threats, intimidation, exclusion, humiliation and raising issues maliciously or in bad faith.
- We want to work with business partners who share our commitments to safety, ethics and compliance and we clearly communicate our expectations of suppliers and business partners, agreeing to contractual obligations where appropriate.

In furtherance of this principle, OneSpan commits to continually:

- Adopt and maintain business policies and practices that endorse human rights.

- Enact corporate practices and policies that protect personal data privacy and security of our customers.
- Comply with applicable laws and company policies.
- Work with our suppliers and consultants to extend and uphold these values through the adoption of our [Supplier Code of Conduct Policy](#)
- Seek to make contractual agreements with our suppliers that require them to respect internationally recognized human rights in their work, consistent with the commitments in this policy, as appropriate to the nature of their work for OneSpan.
- Conduct training for employees to support Human Rights.

#### **4. OUR BUSINESS PARTNERS**

Our Supplier Code of Conduct describes our expectations for our suppliers to reinforce and support our commitment to respect human rights. We want to work with business partners that share our commitments to human rights, safety and ethics and compliance and we seek to collaborate, to encourage them to act in a manner consistent with the principles underlying the commitments set out in this policy. We also request that our suppliers communicate those expectations to their employees, suppliers and business partners who may provide goods or services to us. We will take appropriate measures where they do not meet those expectations or obligations.

#### **5. POLICY COMPLIANCE**

Compliance with this policy is verified through various methods, reports from available business tools, audits, self-assessments and/or surveys and feedback. Implementation of this policy and resolution of any non-compliance will be managed by OneSpan's Chief Compliance Officer or their designee. The principles set forth in this policy are an integral part of other related policies, including but not limited to, the OneSpan Code of Conduct, the Supplier Code of Conduct, our Global Data Privacy Policy, Global Anti-Harassment and Anti-Discrimination Policy and Diversity, Equality and Inclusion Policy.

#### **6. COMPLAINT PROCEDURE**

OneSpan has established the following procedure for lodging a complaint of a violation of human rights, harassment, discrimination, or retaliation. OneSpan, will treat all aspects of the procedure confidentially to the extent reasonably possible.

1. Complaints should be as detailed as possible, including the names of all individuals involved and any witnesses.
2. Complaints should be submitted either to the direct manager or supervisor, unless the complaint is against the direct manager or supervisor, or the appropriate HR manager as soon as possible after an incident has occurred. The Chief Human Resources Officer ("CHRO"), or HR manager may assist the complainant in completing a written statement or, in the event an employee refuses to provide information in writing, the HR manager will dictate the verbal complaint. Additionally, any manager or supervisor who observes harassing conduct must promptly report the conduct to the applicable HR manager.
3. Upon receiving a complaint or being advised by a supervisor or manager that violation of this policy may be occurring, the CHRO will notify senior management and review the complaint with OneSpan's General Counsel.
4. The CHRO and/or HR manager will initiate an investigation to determine whether there is a reasonable basis for believing that the alleged violation of this policy occurred.

5. If necessary, the complainant and the respondent will be separated during the course of the investigation, either through internal transfer or administrative leave.
6. During the investigation, the CHRO and/or HR manager may bring in legal counsel or other management employees, to interview the complainant, the respondent and any witnesses to determine whether the alleged conduct occurred.
7. Upon conclusion of an investigation, the CHRO or other person conducting the investigation will submit a written report of their findings to the company. If it is determined that a violation of this policy has occurred, the CHRO will recommend appropriate disciplinary action. The appropriate action will depend on the following factors:
  - a) the severity, frequency and pervasiveness of the conduct;
  - b) prior complaints made by the complainant;
  - c) prior complaints made against the respondent; and
  - d) the quality of the evidence (e.g., first hand knowledge, credible corroboration).

If the investigation is inconclusive or if it is determined that there has been no violation of policy, but potentially problematic conduct may have occurred, the CHRO and/or HR manager may recommend appropriate preventive action.

8. Senior management will review the investigative report and any statements submitted by the complainant or respondent, discuss results of the investigation with the CHRO and other management staff as appropriate, and decide what action, if any, will be taken.
9. Once a final decision is made by senior management, the CHRO and/or HR manager will meet with the complainant and the respondent separately and notify them of the findings of the investigation. If disciplinary action is to be taken, the respondent will be informed of the nature of the discipline and how it will be executed.

Nothing in this policy may prevent the complainant or the respondent from pursuing formal legal remedies or resolution through the courts. This policy is not intended to restrict communications or actions protected or required by applicable law.