

ONESPAN INC.

ANTI-SLAVERY AND HUMAN TRAFFICKING 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 for personal or commercial gain. OneSpan Inc. and its affiliated entities (together, "**OneSpan**"), consistent with OneSpan's Code of Conduct and Ethics, strive 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 ourselves and for our 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. We expect that our suppliers will hold their own suppliers to the same high standards.

1.3 This Anti-Slavery and Human Trafficking Policy ("**Policy**") applies to all persons working for OneSpan or on our behalf in any capacity, including OneSpan employees, contractors, consultants and temporary employees, officers or directors, third-party representatives and business partners (together, "**Employees and Partners**").

2. RESPONSIBILITY FOR THE POLICY

OneSpan's Board of Directors oversees OneSpan's compliance program, including this Policy. The Chief Compliance Officer and the legal department have 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 personnel 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's 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 to 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 or violation of this Policy has occurred,

or may occur in the future. If unsure about whether a particular act, the treatment of workers more generally, or 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 raise 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 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 other forms of communication, including 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 any individuals and organizations working on OneSpan’s behalf if they breach this Policy.

7. DOCUMENT INFORMATION

Title	Anti-Slavery and Human Trafficking Policy	Version: 0.1
Owner	Chief Compliance Officer	
Purpose	To establish and communicate policies and controls designed to prevent modern slavery.	
Status	Approved	Last reviewed: October 2022
Approved by	Chief Compliance Officer	Date: June 2020
Copyright	© 2022 OneSpan Inc. All rights reserved.	
Usage	This document is publicly available.	