



**OneSpan**

The Digital Agreements Security Company

# **Conflict Minerals Policy**

**Version 3.0 (May 2025)**

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## 1 INTRODUCTION

OneSpan Inc. (together with its subsidiaries, “OneSpan”, “our” or “we”) is committed to corporate social responsibility and respect for human rights. Consistent with this commitment, we strive to responsibly source materials for our products, including with respect to the procurement of Conflict Minerals.<sup>1</sup> It is our goal to use tantalum, tin, tungsten and gold (“3TG”) in our hardware products that does not directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or adjoining countries (the “Covered Countries”), while also supporting responsibly sourced minerals from that region.

## 2 REGULATORY OVERVIEW

In 2012, the U.S. Securities and Exchange Commission (“SEC”) adopted a rule regarding disclosures related to Conflict Minerals as required by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the “Rule”). The Rule requires that companies that are publicly traded on a U.S. stock exchange disclose certain information when the company manufactures or contracts to manufacture products for which the use of 3TG is necessary to the functionality or production of the company’s products. To facilitate OneSpan’s compliance with the Rule, we are committed to conformance with the Organisation of Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition (“OECD Guidance”) which provides recommendations for due diligence in mineral supply chains.

## 3 SUPPLIER REQUIREMENTS

OneSpan uses contract manufacturers to assemble components into our hardware products. These components are sourced from third party suppliers either by the contract manufacturers or by OneSpan. As a result, we are several levels removed from the actual mining of Conflict Minerals. OneSpan’s supply chain is complex, and there are many third parties in the supply chain between the ultimate manufacture of our hardware products and the original sources of Conflict Minerals. In this regard, we do not purchase Conflict Minerals directly from mines, smelters or refiners and make no purchases in the Covered Countries. OneSpan must therefore rely on our suppliers, including our contract manufacturers, to provide information regarding the origin of Conflict Minerals that are included in our hardware products. Moreover, we believe that the smelters and refiners of the Conflict Minerals are best situated to identify the sources of Conflict Minerals. Therefore, in compliance with the OECD Guidance, OneSpan expects our suppliers to:

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<sup>1</sup> “Conflict Minerals” as defined by the U.S. Securities and Exchange Commission (SEC), means gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives, which are limited to tantalum, tin and tungsten.

- maintain supply chain practices that are consistent with OECD Guidance or another similar internationally recognized authority, and require that their direct and indirect suppliers do the same;
- maintain supply chain practices that strive to provide Conflict Minerals that are not sourced in a way that directly or indirectly finances or benefits armed groups in the Covered Countries; and
- conduct reasonable due diligence and provide appropriate information to OneSpan to facilitate our compliance with Conflict Minerals rules and regulations.

## 4 MITIGATION EFFORTS

Should OneSpan become aware that a supplier sources Conflict Minerals in a manner that directly or indirectly finances or benefits armed groups in the Covered Countries, OneSpan will take action to engage the supplier in risk mitigation efforts in compliance with OECD Guidance. OneSpan expects our suppliers to take similar mitigation measures when necessary.

## 5 GRIEVANCE MECHANISM AND REPORTING

Employees, suppliers, and other affected parties are encouraged to report concerns and possible violations of this policy as follows:

- By email: [sustainability@onespan.com](mailto:sustainability@onespan.com)
- By mail:

Chief Compliance Officer  
OneSpan Inc.  
1 Marina Park Drive, Unit 1410  
Boston, MA 02210

Reports may be made anonymously and will be kept confidential to the extent practicable and allowed by law.

## DOCUMENT TRACKING

Document Information		
<b>Title</b>	Conflict Minerals Policy	<b>Version:</b> 2.0
<b>Owner</b>	Legal & Compliance Department	
<b>Purpose</b>	To detail OneSpan's Conflict Minerals policy with regard to gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives, which are limited to tantalum, tin and tungsten.	
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<b>Usage</b>	This document is not confidential and is intended for public consumption.	

Version	Date	Author	Description
1.0	May 2023	Kristy Brown	Initial version
2.0	June 2024	Kristy Brown	Update Section 5 – Grievance Mechanism and Reporting
3.0	May 2025	Kristy Brown	Annual review of policy - no updates required