



Corporate Guideline

ENVIRONMENTAL POLICY

utimaco[®]

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Intro

UTIMACO GROUP includes all businesses operated by Utimaco Group companies (here: Utimaco).

ENVIRONMENTAL POLICY

For Utimaco environmental responsibility is fundamental for producing world-class products. This includes the environmentally friendly use of natural resources and minimizing the environmental impact of our own economic activity.

We comply with all applicable laws, rules and publically accessible and known regulations concerning environment in all the countries in which we operate our businesses.

At Utimaco we take our social responsibilities very serious. The purpose of this policy is to set out the values, principles and responsibilities Utimaco adheres to and expects from all of our employees, partners, distributors, resellers, advisors, consultants, contractors, agents and other intermediaries representing us with regard to environmental practice standards.

Compliance with this policy is a mandatory requirement.

1 ENVIRONMENTAL STANDARDS

Utimaco's environmental responsibility covers all phases of the product life cycle, from development to production and redemption, as well as on other business processes and the site management.

Measures taken in the sense of environmentally friendly use of natural resources and minimizing the environmental impact of our own economic activity include the reduction of greenhouse gas emissions. Waste of all types of energy and water are to be reduced or eliminated. We have a significant use (> 20% of energy) of renewable energy, using green power, server virtualization, energy-efficient TFT monitors, and we are compliant with all relevant laws, guidelines and standards concerning environment in our main operations site in Germany and all the countries we have subsidiaries. Further actions and requirements are:

- Products
 - Minimize usage of raw material by developing products and package that need little material and is compliant to current EU packaging directive
 - Usage of recycled and environmentally friendly materials
 - Development of energy-efficient products
 - Selection of energy-efficient 3rd party products
 - Generally we comply with the EU directive RoHS and WEEE regarding our own products and 3rd party products
- Energy
 - Windows are kept closed when heating
 - Shock ventilation only
 - Heating and office light is turned off during night and weekend
 - Desktop computers to be shut down or set to standby mode during night and weekend
 - Floor light is controlled by a timer and switched off after a while automatically, when not used
- Water
 - Usage of dishwasher instead of hand washing
- Waste
 - Waste separation
 - Waste prevention (preferably recyclable)
 - Safe disposal of waste
- Business travel (see Utimaco's 'Global Travel Policy')
 - Commitment to reduce business travel and hold more virtual meetings
 - The most environmentally friendly transportation should be chosen
 - Reduction of business class flights

This policy extends to all countries in which Utimaco is operating. Local custom and practice is never a justification for departing from this commitment. Employees will never be penalized for compliance with these policies and procedures, even if Utimaco loses business or money as a result. If an employee has concerns or suspicions about anyone's conduct or instances where there may be non-compliance with these policies, our employees are requested to report them quickly to allow those concerns and suspicions to be promptly investigated and responded to. Each of us must take personal responsibility for abiding with this commitment. This includes our senior management team.

2 SCOPE

Universal application

This policy applies to all of Utimaco businesses and extends to all our majority owned business dealings and transactions in all countries in which we operate. This policy applies in all countries in the world regardless of local practice and custom.

This policy applies to all staff, officers, directors, and employees (including temporary workers) in our business worldwide. It applies to our agents, partners, resellers, distributors, contractors, and other intermediaries acting on our behalf or representing Utimaco. All activities carried out on Utimaco behalf must be compliant with this policy regardless of local laws or culture.

Utimaco operates a policy of individual accountability. We are each accountable for compliance with this policy.

Disciplinary procedure

Failure to comply with this policy will be grounds for disciplinary action. Any questions concerning this policy may be addressed to Utimaco's Managing Directors.

Administration of the policy

Utimaco's Chief Financial Officer or a dedicated Nominee from the legal department will conduct the day-to-day administration and enforcement of this policy. Utimaco's Board retains the ultimate responsibility for ensuring that we all comply with the environmental standards.

Any form of discrimination, retribution or retaliation against anyone who has, in good faith, reported a possible violation of this commitment or refused to participate in activities that violate this policy is prohibited and will be treated as a serious disciplinary matter.

Utimaco's board will review the implementation of this policy to test its adequacy and effectiveness from time to time and shall make improvements as appropriate.

3 RESPONSIBILITY

Every one of us must take individual responsibility for complying with this policy.

Each employee of Utimaco must read, be familiar with, and strictly comply with this policy which shall be available on-line and in hard copy via our HR function. Training on all applicable laws and regulations shall be compulsory upon joining the organization and from time to time by way of refresher and up-date.

Laws, regulations and contractual requirements are subject to change, which could require revision to this policy. All personnel to which this policy is applicable shall keep themselves current with any such changes and shall comply with such changes regardless of whether or not the changes have been incorporated into any given version of this policy.

The Utimaco's board of directors has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy. Utimaco's Chief Financial Officer or a dedicated Nominee from the legal department have day-to-day operational responsibility for this policy, and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.

Utimaco Human Resources Managers and Utimaco Managing Directors will review this policy from a legal and operational perspective regularly.

All of Utimaco staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff is invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to your local Human Resources Manager or to Utimaco Managing Directors.

Any questions or concerns relating to this policy should be addressed to Utimaco's CFO directly: frank.nellissen@utimaco.com

Aachen, 10 February 2016

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