

MICROBLINK

# Code of Conduct



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## Introduction

This Microblink Code of Conduct (“**Code**”) sets forth the basic standards and principles of ethical and responsible business practices by which Microblink and its employees, directors, officers, and any other representatives strive to abide by in their everyday business.

“Microblink” or “we”, for the purpose of this Code, means: (i) Microblink LLC (Trg Drage Iblera 10, 10000 Zagreb, Croatia); (ii) Microblink Ltd. (6th Floor, 9 Appold Street, London, United Kingdom, EC2A 2AP); (iii) Microblink USA, LLC, (10 Grand Street, STE 2400, Brooklyn, NY 11249, United States of America); (iv) BlinkReceipt, LLC (d/b/a Microblink) (10 Grand St, Suite 2400, Brooklyn, NY 11249, United States of America); (v) SourcePad INT’L, INC. (25 ADB Avenue, Suite 2701 Discovery Centre Building, Ortigas Center, Pasig City, Philippines); and (vi) any other entity that controls, is controlled by, or is under common control with any of the aforementioned entities.

## What do we do and what is our vision?

Microblink is an AI company that leverages computer vision and machine learning to create unique products and tools in digital identity and commerce. Our global teams eliminate manual entry and power frictionless user experiences for hundreds of millions of people every year. Each year, our technology processes over 700M identity documents and more than 3B in individual consumer purchases around the world.

Our vision is to [bring the benefits of AI to every person on earth](#), and we strive to uphold the highest standards in everything we do — from the way we conduct business to how we care for our employees, clients, and the territories in which we operate. We strive not only to comply with all applicable laws and regulations, but also strive to go above and beyond, implementing industry standards and best business practices wherever possible.

Microblink’s success is built on our company values:



### Succeed Together

- Embracing empathy, honesty, and self-awareness to support each other’s success while having fun and playing to win as a team



### Customer-Centric

- Putting customers at the forefront of everything we do
- Actively listening, adapting and going the extra mile to solve our customers’ toughest problems



### Be Exceptional

- Facing challenges with curiosity and courage, learning from setbacks and focusing on what we can control
- Adding value and continuously innovate for scalable results



### Empowered Responsibility

- Holding ourselves accountable and maximizing our resources and productivity
- Taking initiative in solving problems and delivering on our commitments



This Code builds upon these values and establishes these principles that direct our daily operations and interactions. With this Code, we seek to demonstrate our dedication to conducting business ethically, responsibly, and with a customer-centric approach.

All of our internal and external collaborators should adhere to all applicable laws and regulations. They are also expected to go beyond such legal compliance and draw on internationally recognized standards as well as the guidelines and principles set forth in this Code. If there is any conflict between this Code and local laws or customs and practices, whichever contains the higher standard of conduct shall apply.

## Message from CEO

Microblink operates in a highly competitive and rapidly-changing industry. No matter what challenges or unexpected circumstances we may face, as a business we must always maintain integrity, honesty, and respect for the law — the foundation upon which we build our business.

I want to emphasize that this Code is not just a document - it is a living, breathing embodiment of our values and a reflection of what we stand for as a company. It outlines our expectations for behavior in all areas of our business, including our interactions with clients, suppliers, and each other.

It is up to each and every one of us to uphold the standards stated in this Code and to demonstrate them in our actions every day.

We appreciate your ongoing commitment to ethical business practices and for helping to build a culture of trust, respect, and transparency at Microblink.

A handwritten signature in black ink, appearing to read 'Darren Bassman', written over a horizontal line.

Darren Bassman  
CEO



## Human Rights and Labor Conditions

At Microblink, we believe in promoting and protecting human rights and ensuring the fair and ethical treatment of employees. We are committed to providing a workplace that upholds the highest principles of human dignity, respect, and equality.

**Human Rights in General.** We respect the human rights of all individuals, including those who work with us, those whom we do business with, and those who live in the territories where we operate. We are committed to complying with all applicable laws and regulations relating to human rights.

**Child Labor.** In Microblink, any form of child labor in the workplace is unacceptable and we will not hire anyone under the legal age for employment.

**Forced Labor.** We do not tolerate any form of forced labor, including debt bondage or human trafficking. We do not use any form of coercion or physical force to make an employee work against their will.

**Diversity, Equity, and Inclusion.** We value diversity and believe in creating an inclusive workplace where everyone is treated with respect and dignity. We do not tolerate any form of discrimination or harassment and provide equal employment opportunities to all employees.

**Health and Safety.** We believe that our employees are our most valuable asset, and their health and safety are our top priorities. We provide training, equipment, and resources to support safe work practices and to ensure compliance with all relevant health and safety legislation.

**Working Hours.** We believe in promoting a healthy work-life balance for our employees. We adhere to all local laws and regulations related to working hours and do our utmost to ensure our employees work reasonable hours with adequate breaks to ensure their health and well-being. We also provide flexible work arrangements where possible to accommodate employees' personal needs.

**Wages and Benefits.** We believe in fair and competitive compensation for all our employees, in line with industry standards and local laws and regulations. We provide our employees with benefits that meet or exceed local legal requirements, and we are continuously reviewing and improving our employee compensation and benefits package.

**Freedom of Association.** We respect the right of our employees to associate freely and engage in collective bargaining consistent with applicable national laws and regulations. We will not interfere with any lawful employee's right to join a union or engagement in other collective activities.



## Environment

At Microblink, we recognize our responsibility to protect the environment and mitigate the impact of our operations on the planet. We are committed to achieving sustainable practices in our business activities, office operations, and overall environmental performance. To fulfill this commitment, we strive to:

- comply with applicable environmental laws, regulations, and standards;
- continuously seek ways to reduce our environmental footprint, including reducing the use of natural resources such as energy and water as well as minimizing waste generation and conserving resources;
- implement responsible energy management practices to reduce our energy consumption and increase our use of renewable energy sources;
- purchase environmentally friendly products when available;
- promote environmentally sustainable practices to our employees and encourage them to incorporate these practices into their daily routines.

By implementing the above-mentioned measures and adopting a sustainable mindset, we can make a positive impact on the environment and contribute to a more sustainable future for all.

## Corporate Governance

At Microblink, we are committed to upholding the highest standards of corporate governance across all of our global offices. This includes maintaining ethical and legal compliance, fostering a culture of transparency and accountability, and promoting sustainable business practices.

**Anti-Money Laundering, Fraud, and other Unlawful Behavior.** We are committed to maintaining the highest standards to prevent money laundering, fraud, and other unlawful behavior. Therefore, we expect compliance from our collaborators with all applicable laws and regulations relating to these areas, and we expect these individuals to report any suspicions or concerns they may have. In this respect, we expect our employees and partners to:

- act with honesty and avoid any act that may constitute illegal behavior or fraud;
- contact us without delay to discuss any knowledge or suspicion of potential or actual wrongdoing, unlawful acts, or fraudulent activity relating to money laundering, fraud, and other unlawful behavior; and
- provide us with support and information, as required, in the scope of any investigations or matters of actual or potential wrongdoing, unlawful act, or fraud.



**Anti-Facilitation of Tax Evasion.** We are committed to preventing any facilitation of tax evasion in any country where we operate and are dedicated to the proactive mitigation of unlawful activities. We will also continuously review and improve our anti-facilitation of tax evasion controls to ensure we maintain our high ethical standards.

**Anti-Bribery and Corruption.** At Microblink, our anti-bribery and corruption policy is very straightforward: offering, promising, or taking any kind of bribe, whether directly or indirectly, is unacceptable. We are committed to maintaining the highest standards of integrity and ethics in our business operations, and we strictly prohibit any form of bribery or corrupt practices. We expect all our employees to comply with all applicable anti-bribery and corruption laws and regulations in the territories where we operate. To fulfill this commitment, we will investigate and take appropriate action against any suspected bribery or corruption incidents.

**Gifts and Hospitality.** We prohibit employees from offering and accepting any gift or hospitality that could influence or be perceived to influence, their business decisions or actions. Gifts or hospitality of significant value must always be declined.

**Conflicts of Interest.** We expect our employees and partners to maintain the highest ethical standards, including avoiding any conflicts of interest that could compromise their ability to perform their duties objectively and impartially. We require disclosure of any actual or potential conflicts of interest and we expect employees and partners to recuse themselves from any decision-making processes where a conflict of interest exists.

**Whistleblowing.** Motivating employees to report any suspected misconduct is essential for maintaining a culture of transparency and accountability. Therefore, we encourage employees to report any suspected or actual violations of the law, ethical standards, this Code, or Microblink internal policies, without fear of retaliation. We maintain policies and procedures to facilitate the ongoing reporting of such concerns and to ensure that all reports are handled in a confidential and appropriate manner.

**Embargo.** We are committed not to engage in business with any individual or entity that is subject to international trade and economic sanctions laws and regulations posed by the United Nations, the European Union, the United States, or any other applicable international organization.

**Supply Chain Transparency.** We are committed to promoting transparency and responsible practices in our supply chain. We expect our suppliers to adhere to the standards and principles set forth by this Code as well as all applicable laws and regulations.



**Data Protection and Privacy.** We are committed to protecting the confidentiality, security, and integrity of personal data that we encounter in the course of our business activities. We have established policies and procedures to promote compliance with applicable data protection and privacy laws and to prevent unauthorized access, use, or disclosure of personal data. Should you have any questions regarding this matter, please refer to our [Privacy Policy](#) and/or contact our Data Protection Officer at [privacy@microblink.com](mailto:privacy@microblink.com).

**Information Security.** We are committed to protecting our information assets, including intellectual property, trade secrets, and other proprietary information. We ask all collaborators to adhere to our information security policies and procedures (which are compliant and continuously improved in accordance with ISO/IEC 27001:2013 certification) and to take reasonable measures to safeguard the confidentiality, integrity, and availability of Microblink's information assets.

## Conclusion

If there is any other Microblink policy detailing any topic of this Code in more detail, such policy shall supplement this Code.

Our collaborators' ability to adhere to standards and principles set forth by this Code is a material consideration in our evaluation and selection of new and existing collaborators.

If you have any questions, concerns, or feedback regarding this Code, please do not hesitate to contact Microblink's Legal department via email at [legal@microblink.com](mailto:legal@microblink.com). We encourage open and honest communication and are committed to ensuring that all employees and business partners feel heard and valued.

This Code may be reviewed periodically and is hosted on Microblink Legal center for viewing at any time.

Thank you for taking the time to read this Code, and for your ongoing commitment to upholding the values and principles it represents. Together, we can continue to build a successful and sustainable future for Microblink and our territories.