

Vendor Code of Conduct Policy

PURPOSE

Digimarc conducts business in an ethical, moral and fair approach to ensure that these standards are complied with by our vendors, suppliers and business partners. Digimarc has developed this Vendor Code of Conduct intending to inform those parties with whom we do business with what minimum moral and ethical standards are to be practiced across all countries. While we acknowledge that there are different cultural and legal standards worldwide, this code sets out the minimum core standards fundamental to the relationship Digimarc has with its Business Partners.

Failure to comply with this Code of Conduct may be sufficient cause for Digimarc to cease doing business with your organization. As a condition of doing business with Digimarc, we reserve the right, and you agree to permit Digimarc, to review publicly available information or to conduct periodic inspections or request appropriate documentation or certification by suppliers to verify compliance with this Code of Conduct. Business Partners agree to cooperate and assist Digimarc with any requested information to demonstrate your compliance.

GENERAL LEGAL, MORAL AND ETHICAL BEHAVIOR

Digimarc respects the jurisdictions' legal, moral and ethical standards where and people with whom we do business. Business Partners are also expected to respect both Digimarc's rules and procedures, as well as those laws, rules, processes and procedures of the countries in which they operate. Further, Business Partners are expected to comply with laws, rules, regulations and conventions related to the conduct of business between countries. All types of fraud, bribery and corruption are forbidden regardless of the country in which they may be operating, or on whose behalf they may be acting. Minimally, Business Partners are expected to comply with the UK Bribery Act, the US Foreign Corrupt Practices Act, and the US Anti-Money Laundering rules. Digimarc has procedures for Business Partners to be able to confidentially report any suspected case of fraud, bribery or corruption. Compliance with US import/export laws are paramount for Digimarc. Business Partners importing and exporting products to, from or on behalf of Digimarc are expected to strictly comply with US export laws and must establish procedures and processes to ensure compliance. Digimarc also takes seriously its obligations and expects its Business Partners to cooperate with law enforcement in connection with enforcement and compliance related to the illicit/illegal drug trade.

BAN ON CHILD LABOR

Child labor is defined in various UN and ILO conventions and in national legislation. The use of child labor, as described, is prohibited in the manufacture of products or provision of services. Digimarc views a violation of these laws as the employ of any child under the age of 16 or who is younger than the ages legally allowed to work outside compulsory school hours.

BAN ON FORCED LABOR AND DISCIPLINARY BEHAVIOR

All forms of forced labor are prohibited. All forms of mental and physical coercion, verbal abuse and corporal punishment are not permitted. Indentured servitude, trafficked labor or the forced labor of individuals against their will or subject to intimidation or under threat of any kind is prohibited.

WORKING CONDITIONS AND REMUNERATION

Business Partners are expected to comply with minimum compensation requirements, including regular and overtime pay, as determined by applicable local regulation or legislation. Also, working hours must conform to applicable local legislation. Working conditions must conform to minimum legal standards to ensure a safe and healthy working environment. Subcontractors within the Business Partner’s supply chain are also expected to provide a safe and healthy working environment.

BAN ON DISCRIMINATION

Business Partners are expected to assure that discrimination does not occur against an employee on the basis of gender or sexual identity, age, religion or ideology, race, ethnic or national origin, social background or disability and any similar kind of discrimination, as determined by applicable local regulation or legislation.

FREEDOM OF ORGANIZATION AND ASSEMBLY

Business Partners are expected to assure the right of employees to engage in collective action, including collective bargaining and unionization, as determined by applicable local regulation or legislation.

