

# Vigilance Plan

January-December 2022



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Unlock the world  
**make it safer**



## 1. INTRODUCTION

IDEMIA's mission is to open up the world and make it as safe as possible, so that everyone can move around the physical and digital worlds in complete safety. Through its activities, IDEMIA makes identity and safety issues more dynamic and reliable .

The importance of these challenges requires IDEMIA to serve as an example in terms of trust, transparency and responsibility, and to be particularly vigilant about the impact of its activities on its stakeholders.

For this third edition of its vigilance plan, in application of Law n° 2017-399 of 27 March 2017 on the duty of care of parent companies and ordering companies (hereinafter the "Duty of Care Law"), IDEMIA is working to comprehensively cover the activities of its group (hereinafter the "Group"), but also those of its suppliers and subcontractors.

This plan breaks down as follows :

- › IDEMIA CSR (Corporate Social Responsibility) strategy : IMPACT programme
- › Description of the perimeter of the vigilance plan
- › Specific governance related to the Duty of Care
- › Group alert mechanism
- › Risk analysis by topic, including specific assessment, mitigation and/or prevention measures






## IDEMIA CSR strategy: IMPACT programme

IDEMIA has entrusted the implementation of its sustainable development and social commitment strategy to the CSR team, which reports directly to General Management.

The IDEMIA CSR strategy is deployed through a programme entitled “IMPACT”, which sets out the Group's priorities in the pursuit of its Corporate Social Responsibility objectives, which are aligned with 12 of the United Nations Sustainable Development Goals (SDGs).

The IMPACT programme defines guidelines for the following topics in conjunction with the relevant stakeholders :

- › Environment,
- › Employees and well-being at work,
- › External stakeholders,
- › Actions with local communities,
- › Ethics.

ESG (Environmental Social Governance) correspondence	IMPACT pillar	2020-2023 objectives	2022 progress
<b>ENVIRONMENT</b>		Reduction of our impact on the environment: 25% reduction of CO2 and water emissions by 2025	▶▶▶▶▶
		Integrating and developing green offers	▶▶▶▶▶
		Developing and maintaining environmental awareness in R&D	▶▶▶▶▶
		Building a carbon-neutral strategy as of 2023	▶▶▶▶▶
<b>SOCIAL</b>		Giving every employee access to training	▶▶▶▶▶
		Including and obtaining feedback on CSR in our employee survey	▶▶▶▶▶
		Developing diversity and inclusion: increasing both the number and internal promotion of women at IDEMIA	▶▶▶▶▶
<b>ENVIRONMENT, SOCIAL</b>		Including CSR questions in our customer survey	▶▶▶▶▶
		Increasing the number of key suppliers audited by EcoVadis	▶▶▶▶▶
		Assessing emissions within our supply chain	▶▶▶▶▶
		Encouraging internal and external communication on CSR	▶▶▶▶▶
<b>ENVIRONMENT, SOCIAL</b>		Coordinating a group initiative across all sites	▶▶▶▶▶
		Encouraging local community actions, mainly support for education	▶▶▶▶▶
<b>GOVERNANCE</b>		Redefining the IDEMIA ethics committee, while including CSR representation	▶▶▶▶▶
		Conflict of interest prevention campaign	▶▶▶▶▶
		Developing an “antitrust” programme	▶▶▶▶▶
		Focusing on “Trade compliance”	▶▶▶▶▶

## 2. PERIMETER

In compliance with the French “Duty of Care” law, IDEMIA publishes its vigilance plan on an annual basis, so as to be able to regularly update its progress in this area.

For the 2022 edition, the IDEMIA vigilance plan covers all of the Group's activities, with the exception of subsidiaries acquired in recent years, which are in the process of deploying their risk analysis and associated measures. They will be included in the 2023 vigilance plan.

Since its creation, IDEMIA's mission has been to open up the world and make it a safer place, thanks to cutting-edge identity technologies.

In over 180 countries, governments and thousands of companies, including some of the world's largest and most influential, rely on us for their critical activities. Thanks to our technologies, our customers can register citizens and users of their services, provide them with identifiers, verify identities and analyse them, thus streamlining access control, connectivity, identity use, payments, public safety and travel. Our technologies meet their needs on a large scale and guarantee flawless safety.

IDEMIA's 15,000 employees are spread across five geographic zones and six continents (Europe, Middle East and Africa, Asia-Pacific, North America and South America), within :

- › 59 administrative and commercial sites (registered office, representative offices, sales offices),
- › 12 industrial sites,
- › 49 service and support centres,
- › 18 R&D centres and design offices.

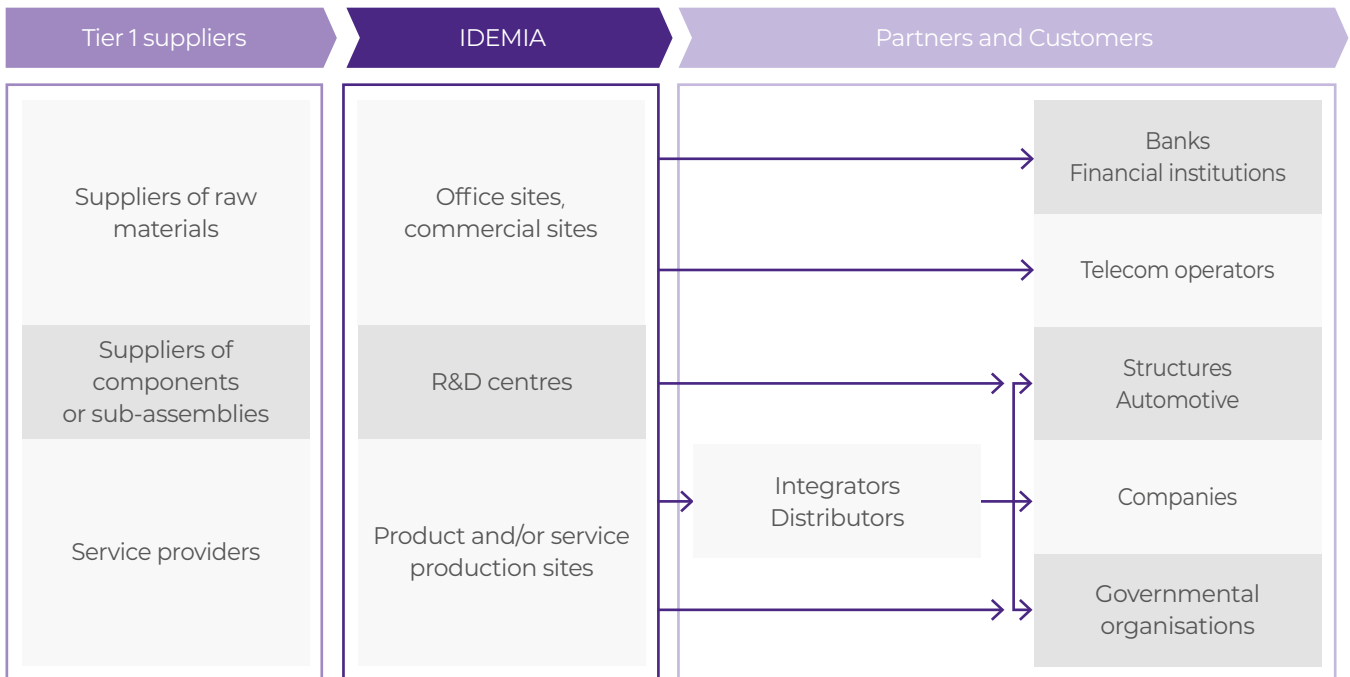
### Geographical distribution of IDEMIA sites



IDEMIA's activities are divided into two segments :

- › **Governmental:** this segment addresses the markets for civil identity, access control, passenger routing facilitation, passenger checks and public safety,
- › **Companies:** this segment addresses the markets for payment services and connectivity services.

#### IDEMIA's value chain and market access channels





### 3. Governance and management of the vigilance plan



The vigilance process is overseen by a steering committee made up of the IDEMIA CSR and Legal & Compliance Departments. This committee supports the operational and support departments (in particular, the Health, Safety and Environment (HSE) teams, the Safety Department, the Risk Department, the Purchasing Department, the Quality Department and the Human Resources Department) in defining action plans containing appropriate vigilance measures. It ensures their consistency and monitors their implementation. In doing so, it maintains a constant link with three other important CSR bodies :

- › The ECS Committee, which, as a Supervisory Board committee, reports to the Supervisory Board on improvement measures in the areas of Ethics, Compliance and Safety.
- › The Ethics Committee, which is responsible for handling alerts (for further details, please refer to the next section on the Alert Mechanism),
- › The Human Rights Committee, which reviews the most sensitive business opportunities in terms of their potential impact on human rights; its role is more fully described in the section on risks (section 5.2 below).

More specifically, the steering committee is responsible for the following tasks :

- › Preparation of the risk mapping relative to the duty of care,
- › Selection of monitoring indicators, their performance and relevance,
- › Follow-up of action plans defined by the various departments,
- › Drafting of the vigilance plan.

In practice, working groups with members from several departments have been set up to address issues relating to the duty of care :

- › Confidentiality and protection of personal data,
- › Human rights,
- › Environment,
- › Health & Safety.

IDEMIA exchanged views with various stakeholders while preparing this 2022 plan, including customers, suppliers and employee representative bodies, as well as three African and European NGOs concerned with personal data and human rights.

## 4. Alert mechanism

IDEMIA has set up a global alert system, reinforced in 2020, open to employees, external and occasional employees as well as employees of the Group's partners, suppliers and subcontractors and of joint ventures in which IDEMIA has a stake, in accordance with the provisions of the Duty of Care Law and the Sapin II Law, amended by the Law of 21 March 2022 aimed at improving the protection of whistleblowers (Waserman Law). The "Integrity Line" system is available in 17 languages.

The system can be accessed from IDEMIA's corporate website or at the following address : <https://idemia.integrityline.org/>.



The screenshot shows the IDEMIA whistleblowing platform interface. At the top, the IDEMIA logo is on the left, and navigation links for FAQ, Inbox, and Language (English) are on the right. The main heading reads "Welcome to the IDEMIA whistleblowing platform". Below this, a message states: "You can report any incident within the company that violates applicable laws or the internal code of conduct. We appreciate your cooperation". A section titled "Message from the President & CEO" contains a quote from Pierre Barrial, President & CEO, emphasizing the company's commitment to ethics, transparency, and integrity. At the bottom of the main content area is a large blue button labeled "Submit an alert". A footer bar at the bottom of the interface states: "You are now on the secure EQS Group whistleblower platform. The platform is not part of the IDEMIA website or Intranet."

Anyone may also contact the Ethics Committee to ask a question or report facts presenting a risk of non-compliance with the [IDEMIA Ethics Charter](#) via the generic e-mail address [ethics@idemia.com](mailto:ethics@idemia.com).

The Ethics Committee is a central structure. Its members are Group managers with a good knowledge of the Group's activities, who have the independence and freedom of mind required to carry out their mission. The Ethics Committee ensures compliance with the Ethics Charter and oversees its implementation.

This system can be used to transmit all alerts falling

within the scope of the Sapin II law and the Duty of Care Law, as well as those relating to the reporting of practices contrary to the Ethics Charter (situations of harassment, sexist behaviour, etc.). The confidentiality of reports made to the Ethics Committee is guaranteed and can only be lifted with the consent of the persons concerned.

The Ethics Committee centralises all internal and external alerts. Each alert is analysed and pre-qualified for investigation by the Ethics Committee. Depending on the type of allegation, the Ethics Committee decides on the investigation strategy, the checks and interviews to

be carried out, and the required support. Information collected in connection with an alert procedure is strictly confidential and stored in an online portal that can be accessed only by members of the Ethics Committee.

TYPE OF ALERTS RECEIVED	2021	2022
Allegations of fraud	4	4
Allegations of corruption	0	2
Allegations of conflicts of interest	2	3
Allegations of harassment	1	3
Allegations of favouritism	1	2
Non-compliance with the Ethics Charter	2	3
Inadmissible	1	0
<b>TOTAL</b>	<b>11</b>	<b>17</b>

DECISIONS	2021	2022
Sanctions	4	6
Reminder of the policy and regulations	3	6
Dedicated training	1	1
No further action	2	4
Not applicable	1	0
<b>TOTAL</b>	<b>11</b>	<b>17</b>



## 5. Risk mapping, assessment, mitigation actions and areas for improvement

Identifying, assessing and prioritizing the risks that IDEMIA's activities may entail for third parties is an essential prerequisite as part of the preparation of its vigilance plan.

IDEMIA's approach to risk mapping for the vigilance plan was to combine several risk analysis exercises :

- › As part of its Corporate Social Responsibility policy, IDEMIA uses a materiality matrix to identify and manage its main challenges. Stakeholders were consulted in order to assess key issues: 10 customers and suppliers and over 1,000 employees. These analyses and assessments were carried out in 2022 by an external firm.
- › In addition, IDEMIA draws up several internal thematic risk maps (detailed approach below for each risk category) which involve various stakeholders and are regularly updated. IDEMIA used their results to focus on human rights, health and safety and environmental risks affecting third parties.

This combined approach is presented below. In 2023, IDEMIA plans to harmonize its various risk maps so as to have the 2023 vigilance plan include a global map that graphically represents the relative position of the various risks identified by IDEMIA.

### 5.1. Environmental risks

#### Risk mapping

As an industrial company, IDEMIA has positioned itself in the fight against climate change, through a short-term plan to reduce its emissions, which is to be rolled out in 2023.

In order to establish a hierarchy of the environmental risks associated with IDEMIA's activities, the Group relies on a detailed analysis of the risks determined by the sites with the highest activity volumes.

To this end, two major risks directly related to its activity have been identified :

- › Climate risk and energy consumption,
- › Risk of pollution and degradation of local ecosystems and biodiversity.

As part of its "IMPACT" plan, IDEMIA has defined several action plans aimed at reducing emissions from:

- › All of our sites, especially production sites,
- › Its logistics operations,
- › Its suppliers and subcontractors as part of a global CSR approach to the supply chain.

#### 5.1.1. Climate risks related to IDEMIA's activities: carbon footprint linked to energy and atmospheric emissions

##### 5.1.1.1. Assessment and monitoring procedures

IDEMIA constantly seeks out and implements ways and means for reducing its greenhouse gas emissions.

As an initial phase, the Group has set itself the target of reducing its CO2 emissions, including Scope 1 and 2 as well as part of Scope 3 as defined by the Green House Gas (GHG) Protocol Standard.

Energy consumption under Scopes 1 and 2 is reported by the various sites and consolidated periodically to measure the evolution of IDEMIA's emissions and the effectiveness of the implemented actions.

On a local basis, the sites process and monitor these data. They implement action plans on the least efficient processes and systems with the aim of improving their energy consumption. Some sites have set up energy committees, enabling them to go further in analysing the actions to be taken. It is worth noting that the roll-out of the energy efficiency plan in France from the autumn of 2022 in line with government recommendations has also helped to accelerate certain optimisations.

Data are also consolidated worldwide by the CSR team, which analyses trends in energy consumption in order to recommend actions for improvement in conjunction with the various Group entities.

### 5.1.1.2. Mitigation measures

The reduction programme for Scope 1 and 2 emissions is based on two pillars :

- › Reducing energy consumption by implementing energy efficiency plans,
- › Increasing the share of energies consistent with energy transition objectives.

The first pillar is based on an efficiency approach for the sites, which is integrated into the management of the Group's activities by deploying practices to reduce energy consumption, optimise facilities and limit waste.

The second pillar is based on the commitment of the sites to a proactive approach to the supply of renewable energies in their electricity supply contracts, in order to promote less carbon-intensive practices. The proportion of renewable energies in the consumed energy is also assessed.

These two pillars are also reviewed as part of investment projects on new sites.

### 5.1.1.3. 2023 outlook

An energy efficiency plan will be rolled out on the Group's main sites, with quarterly assessments of the effectiveness of the action plans.

The analysis of impacts linked to the use of our products, to our suppliers and subcontractors and those linked to the end of the product life cycle (Scope 3) will complete the previous phase while involving the relevant stakeholders. In this context, IDEMIA will be launching a number of offers that will enable its customers to achieve energy savings in the use of services and products.

## 5.1.2. Climate risks related to IDEMIA's activities: risks related to the transport of goods

As IDEMIA's activities are international, the impact of freight transport is analysed from various angles: transport of purchased goods, transport of products between Group sites or delivery of products to customers.

### 5.1.2.1. Assessment and monitoring procedures

In order to determine the emission levels linked to the transport of goods, IDEMIA collects the carbon impact of their activities from carriers, so as to make trade-offs and involve the various stakeholders in the decisions, both upstream for the purchase of raw materials and components, and during the delivery to customers.

Indicators on the transport of purchased raw materials have been set up to analyse changes in modes of transport and their impact.

### 5.1.2.2. Mitigation measures

IDEMIA has accelerated the use of sea freight as an alternative to air freight (reducing greenhouse gas emissions by more than 20 times compared with air All

transport-related data will gradually be integrated into the internal CSR reporting tool so as to enable both local and global monitoring of the implemented initiatives.

A number of discussions have been launched with customers in order to develop delivery methods between IDEMIA and the customer, while respecting the constraints specific to the delivered products and services.

### 5.1.2.3. 2023 outlook

All transport-related data will gradually be integrated into the internal CSR reporting tool so as to enable both local and global monitoring of the implemented initiatives.

A number of discussions have been launched with customers in order to develop delivery methods between IDEMIA and the customer, while respecting the constraints specific to the delivered products and services.

## 5.1.2. Risks of pollution of local ecosystems and degradation of biodiversity: waste production and management

These are environmental risks linked to the use and wastage of resources allocated to the production process, as well as contamination of soil, water or air directly attributable to production.

### 5.1.3.1. Assessment and monitoring procedures

The Group sites are required to provide regular reporting on the quantity of non-hazardous and hazardous waste generated by each site, while identifying its final destination. These data are accessible to the industrial departments, which then take corrective or preventive actions. They are consolidated on the Group level for assessment purposes.

List of assessed indicators and results :

	2019	2020	2021	2022
<b>Quantity of waste:</b>				
• <b>Hazardous</b> (Tonnes)	251	442	193	266
• <b>Non-hazardous</b> (Tonnes)	4,664	5,006	4,599	5,107
<b>Final destination of waste:</b>				
• <b>Landfilled</b> (%)	9	13	7	7
• <b>Incinerated</b> (%)	15	13	19	83
• <b>Recycled</b> (%)	76	74	74	10



To ensure compliance with these various environmental aspects, the most important production and customization sites hold ISO 14001:2015 certification.

ISO 14001:2015 certified sites	Certification expiry date
Johannesburg, South Africa	24.08.2025
Cotia, Brazil	18.03.2024
Santiago, Chile	28.11.2023
Shenzhen, China	02.05.2023
Bogota, Colombia	28.06.2024
Yumbo, Colombia	28.05.2024
Exton, United States	22.04.2024
Dijon, France	15.12.2025
Vitré, France	02.07.2023
Noida (Production plant), India	20.12.2023
Noida (Smart Chip Biometric), India	06.12.2023
Milan, Italy	24.03.2026
Haarlem, Netherlands	12.06.2024
Ostrava, Czech Republic	12.06.2024
Tewkesbury, United Kingdom	19.08.2023
Strangnäs, Sweden	30.12.2023

These measures complement the monitoring and analysis of waste levels on the production line, which represent an operational performance indicator as well as an indicator of the proper use of raw materials.

#### 5.1.3.2. Mitigation measures

On the level of the Group sites: The objective of reducing and recovering waste is based on several types of actions:

- › Consideration of the definition of waste generated through the involvement of industrial sites and product teams in the Group's CSR approach,
- › Implementation of agreements on recycling and the use of recycled material with local partners.

IDEMIA's approach to waste is twofold. Firstly, the Group has extended its product range to reduce its consumption of raw materials of fossil origin. Secondly, waste

production is regulated and subject to specific local procedures.

In terms of customer offers: the Group is well aware of the challenges posed by the significant use of raw materials in its industrial activities, particularly plastics. With this in mind, two IDEMIA offers have been developed to reduce resource consumption upstream in the production cycle.

These are "GREENPAY by IDEMIA" (bank cards) and "GREENCONNECT by IDEMIA" (SIM cards). These cards use rPVC ("recycled Polyvinyl chloride") or rABS ("recycled acrylonitrile butadiene styrene") plastics from the industrial waste recycling sector. In concrete terms, these offers help to reduce the use of virgin plastics in the production and conversion chain.

"GREENPAY by IDEMIA" has been awarded the following certifications :

- › CEC (Card Eco-Certification) issued by Master card,
- › ICMA (International Card Manufacturers Association) in the United States,
- › UL (Underwriters Laboratories) for certain sources of recycled PVC.

IDEMIA's teams are encouraged to seek innovative solutions to reduce the overall footprint of the products manufactured and distributed by the Group. In this regard, the introduction of new SIM card formats has significantly reduced the environmental footprint of these products. In fact, so-called "halfSIM" formats significantly reduce the size of the cards, and consequently the amount of material needed to produce them. Combined with the use of recycled materials such as rPVC, these initiatives provide for a significant reduction of CO2 equivalent emissions linked to card production.

The results of these efforts are assessed through LCAs (Life Cycle Assessments) that measure and compare the environmental impact of different products. To this end, IDEMIA's teams work in collaboration with external partners that are experts in eco-design, in order to accurately identify the environmental impact of the various products. Bureau Veritas was commissioned to validate the analyses carried out on the "GREENCONNECT by IDEMIA" range.

#### 5.1.3.3. 2023 outlook

With a view to harmonizing the environmental risk management requirements of its sites, IDEMIA has embarked on a process to extend its ISO 14001:2015 certification to a global level. This will be accompanied by the introduction of a Group-wide environmental management system.

IDEMIA is working actively with its customers to develop and implement end-of-life management solutions for payment cards, while taking security constraints into account.

In 2023, the "GREENCONNECT by IDEMIA" offer will be enhanced with an option called "APOCa" (for "ABS Plug

On Cardboard card”), which will reduce the volume of plastic sent to mobile operators, and by extension to end-users. Indeed, based on the principle that only the part inserted in the phone (the SIM module) needs to be made of plastic, in order to meet the specific physical constraints required by the ETSI (European Telecommunication Standards Institute), IDEMIA has developed a SIM module holder made entirely from cardboard.

This innovation facilitates the end-customer's commitment to end-of-life management, since the card can be recycled in any country around the world.

#### 5.1.4. Risks associated with the use of polluting chemicals

IDEMIA's industrial activities in the production and personalization of bank cards, SIM cards and identity documents involve the use of certain chemical substances that may be hazardous to humans or the environment. Substances considered to be hazardous are identified in a database at each industrial site in order to determine their level of danger and the precautionary measures to be taken in connection with their use. Each substance and its level of hazard are identified by appropriate labels.

##### 5.1.4.1. Assessment and monitoring procedures

The sites exposed to these risks set up rigorous systems for monitoring changes to the legislation, as well as their suppliers. Inspections are carried out on a regular basis, and training is provided for personnel members who come into contact with these substances.

Sites that have identified a risk linked to the use of chemical substances in their risk mapping are required to implement precautionary measures so as to mitigate the potential consequences of accidents resulting from their use. Regular audits are performed by internal and external parties as part of the ISO 14001:2015 certification.

##### 5.1.4.2. Mitigation measures

Mitigation measures are in place at every site where there is a risk of accidental spillage of a chemical agent that could lead to soil or water pollution, or harm the health of employees. These measures include :

- › Training in the handling and storage of chemical waste for those persons involved and exposed;
- › Awareness-raising with regard to procedures in case of accidental chemical spills;;
- › Declaration of possession of hazardous substances and wastes;
- › Hazardous waste removal by specialised companies;
- › Implementation of a response procedure in the event of a chemical spill;
- › Installation of universal absorption kits around storage areas;
- › Regular inspections and verifications on the effi-

ciency of ventilation, electrical and fire-fighting systems within the storage sites ;

- › Regular organisation of emergency drills in the event of chemical accidents;
- › Prevention and organisation of medical examinations concerning chemical occupational risks.

## 5.2. Human rights risks associated with IDEMIA's activities

IDEMIA respects and promotes human rights in all of its activities around the world. The Group is convinced that all individuals must be treated with respect and dignity, and that companies must play their part in protecting their fundamental rights. In this respect, IDEMIA's products help people to secure their identities, enabling them to fully access their civil, political and social rights as citizens.

IDEMIA respects and promotes the importance of human rights in its business, wherever the Group operates. In this regard, IDEMIA respects the principles set out in:

- › The United Nations Global Compact
- › The United Nations Sustainable Development Goals
- › The International Bill of Human Rights
- › The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- › The United Nations Guiding Principles on Business and Human Rights
- › The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- › The Convention on the Elimination of All Forms of Discrimination against Women
- › The International Convention on the Elimination of All Forms of Racial Discrimination
- › The American Convention on Human Rights
- › The African Charter on Human and Peoples' Rights
- › The European Convention on Human Rights (ECHR).

Other sections of the document deal with other human rights risks, notably those likely to affect IDEMIA's employees and those linked to the activities of IDEMIA's suppliers.

### Risk mapping:

The identification of risks relating to human rights is based on several internal risk maps produced by IDEMIA:

- › Mapping of corporate risks,
- › Mapping of security risks, which includes a section dedicated to the security of personal data,
- › Mapping of human rights risks associated with the use of IDEMIA products, carried out for the first time in 2022.

These maps have identified the following risks :

1. Personal data and privacy risks
2. Risk of misuse of our products by an IDEMIA customer or user of these products, without our knowledge, in order to commit human rights violations (e.g.: discrimination, internal repression, etc.)<sup>1</sup>.

### 5.2.1. Personal data and privacy risks

These risks have several dimensions :

- i. A dimension linked to the security of IDEMIA systems (e.g.: hacking, data loss), a risk for which the potentially affected third parties are the people whose personal data are processed in systems designed by IDEMIA, as well as the people whose personal data are processed by IDEMIA.
- ii. A dimension linked to non-compliance with the applicable regulations (e.g.: risk of misuse, unregulated storage of personal data) that may be prejudicial to the persons whose data are processed :
  - › Either by IDEMIA as a processor or, exceptionally, as a data controller ;
  - › Or by the end-users of IDEMIA systems.

#### 5.2.1.1. Risk assessment procedures

IDEMIA ensures that it complies in all circumstances with applicable regulations on the processing of personal data, and notably with the national legislation of the countries in which it operates, as well as with relevant international texts, including, but not limited to, national data protection laws, the GDPR and the International Bill of Human Rights.

#### The processing of personal data in connection with IDEMIA's commercial activities

Whether in its activities in the service of companies (e.g.: bank cards, SIM cards) or in those serving governments (e.g.: set-up of civil status registries, border control solutions), IDEMIA only exceptionally serves as the data controller. When IDEMIA processes the personal data of users of its systems, it does so as a processor for a customer, which remains the data controller.

In addition, IDEMIA has several assessment procedures in place in connection with its business activities, including in cases in which IDEMIA does not process any personal data.

These assessment procedures are the following :

1. IDEMIA is currently rolling out a Personal Data Checklist for commercial opportunities, which consists of a personal data protection analysis carried out by the Group Data Protection Officer (DPO), with a notable focus on countries with the lowest level of personal data protection. These analyses cover the type of data to be processed and/or exported, the envisaged technical architecture, the country's political context, the end-users, and local legislation on personal data and cyber-security.
2. Even when IDEMIA does not act as a data controller, it undertakes that its IDEMIA research and development projects shall include an assessment as to their compliance with the so-called "data privacy by design" and "data privacy by default" approach, in accordance with the principles of article 25 of the General Data Protection Regulation (GDPR), which applies to the data controller and not the processor.

This approach implies integrating personal data protection right from the design stage, and by default from the very start of product development, then considering this dimension as central at the stage of drafting functional requirements, implementation, testing, deployment, production, support and end of life cycle.

1. Human rights risks have been mapped by product range. This section summarizes the most salient identified risks..



### 5.2.1.2. Risk mitigation measures

IDEMIA has implemented the following risk mitigation measures:

1. IDEMIA ensures the protection of the personal data that it processes through technical and organisational security measures :

Technical security measures (non-exhaustive list):	Organisational security measures (non-exhaustive list):
<ul style="list-style-type: none"> <li>› Encryption</li> <li>› Double authentication</li> <li>› Data segmentation</li> <li>› Management of access rights</li> <li>› Pseudonymization: action of replacing the directly identifying data (surname, first name, etc.) within a data set with indirectly identifying data.</li> <li>› Anonymization: action of rendering personal data totally and irretrievably anonymous.</li> </ul>	<ul style="list-style-type: none"> <li>› A network of GDPR referents at the level of the registered office</li> <li>› A European network of DPOs in the countries where IDEMIA is present, including when this is not mandatory under article 37 of the GDPR</li> <li>› An international network of data contact points or DPOs when the country has personal data legislation</li> <li>› Data centres in Europe</li> <li>› Monitoring of regulations by country</li> <li>› Alert procedures in case of a personal data breach.</li> </ul>

The above list is non-exhaustive, as it covers only those measures that are specific to the protection of personal data. In addition, cybersecurity measures are in place, though not detailed in this document, so as to ensure the protection of all data, personal and otherwise.

2. Product development: Data privacy by design and by default

IDEMIA integrates data protection immediately from the design stage, and by default from the very beginning of the development of any product or system. The development teams have a checklist to verify that the following are provided, where applicable (depending on the legal basis of the processing) :

- › Consent given by the user: either on the device, or on a pop-up window, or by digital acceptance, or by reading and accepting the terms and conditions, or on a consent platform ;

- › A privacy policy included in the device;
- › Possible access rights: access by the user to his/her own personal data, right of rectification, right of deletion ;
- › Information on the main purpose of the processing;
- › Information on data transfers ;
- › Information regarding the data controller ;
- › Information regarding partners: within and outside of the EU ;
- › Information regarding the data controller.

IDEMIA's approach can be summarized in the following terms :

<p><b>N°1 Basic principle</b></p> <p>Protecting privacy must be one of the company's core principles. Any project involving information and that supports data processing must include privacy protection in its specifications.</p>	<p><b>N°2 Privacy by default parameter</b></p> <p>Provide users with the highest possible levels of confidentiality, given the state of the art.</p>	<p><b>N°3 Integration of the principle of privacy by design</b></p> <p>This is not an additional layer or module, this principle must rather be integrated as a non-functional specification right from the concept development and design phases themselves.</p>	<p><b>N°4 Privacy protection as a function</b></p> <p>If a product function poses a risk to the privacy of end-users, new solutions and alternatives must be sought to achieve the desired functionality and objectives.</p>
<p><b>N°5 End-to-end security</b></p> <p>This means guaranteeing the confidentiality, integrity, availability and resilience of systems, as well as the ability of the person concerned to intervene and exercise control. Include the most appropriate measures for protecting information.</p>	<p><b>N°6 Visibility and transparency</b></p> <p>In compliance with article 39 of the GDPR, inform end users of how their data will be processed in order make them feel confident.</p>	<p><b>N°7 User-centric privacy protection</b></p> <p>Data subjects must play a role in managing their data and controlling what others do with them.</p>	

3. Depending on the risk level assessed on the basis of the Personal Data Checklist for Business Opportunities, the DPO may recommend various risk mitigation measures, up to and including abandonment of the project.
4. IDEMIA includes clauses relating to personal data protection in its standard contracts and in its general terms and conditions of sale and purchase, thereby ensuring a level of protection that complies with the GDPR.
5. IDEMIA has several relevant Group policies on the subject of personal data, including the Group Office Confidentiality Policy, the IDEMIA Group Physical Security Policy and the Security Policy.
6. Two mandatory online awareness-raising modules have been deployed for all IDEMIA employees: one on personal data and the other on security, covering cyber security, personal physical security, data protection and social engineering.

### 5.2.1.3. Follow-up mechanism

In 2022, 15 IDEMIA sites were ISO 27001 or 27701 certified for data security.

Country	Site	ISO 27001	ISO 27701
Albania	Tirana	16/12/2023	
Chile	Santiago	25/12/2024	
China	Shenzhen	31/10/2025	
Czech Republic	Ostrava	24/11/2025	
France	Courbevoie	03/11/2023	
France	Osny	04/05/2023	
France	Vitré	02/07/2023	
India	Noida (registered office)	31/10/2025	
India	Noida (Smartchip Biometric)	31/08/2023	
India	Noida (Syscom Factory Main Unit)	22/05/2023	
Italy	Milan	24/03/2023	
Netherlands	Haarlem	23/01/2025	
Netherlands	Haarlem (ID&S)	18/12/2023	
Norway	Stavanger	30/12/2022	30/12/2023
United Arab Emirates	Dubai	10/08/2023	

### 5.2.1.4. 2023 outlook

In 2023, IDEMIA plans to further develop its risk analysis mechanism related to personal data for its business opportunities.

## 5.2.2. Risks of IDEMIA's products being misused in a context of human rights violations (e.g: discrimination, internal repression, etc.)

### 5.2.2.1. Risk assessment procedures

IDEMIA's products are solely for civilian use. They aim to improve people's daily lives and ensure that they can exercise their rights. In the field of identity and security, IDEMIA's projects are often supported and/or financed by institutional actors such as the World Bank, UNOPS, OSCE or Interpol.

Nevertheless, some products can be diverted to uses that violate human rights, whether deliberately or through negligence. This means that IDEMIA must be particularly vigilant when it comes to the use of its products.

To this end, three risk assessment procedures are available. They may be cumulative :

#### 1. Export control processes

IDEMIA's export control and international sanctions compliance programme is aligned with best practices defined by the Wassenaar Arrangement, the United States, the European Union, Germany, the Netherlands and China. It was externally audited in 2022, thereby confirming its appropriateness with regard to IDEMIA's risk environment.

This programme includes several elements to assess the risk of misuse of IDEMIA products by their end-users :

- › - It provides for verification that third parties with which IDEMIA has dealings are neither on an international sanctions list, nor held by persons on a sanctions list. Some of these sanctions lists target individuals for human rights violations (e.g. the so-called "Magnitsky" lists).
- › IDEMIA has identified those of its products that qualify as "cyber-surveillance" technology under EU regulation n° 2021/821. For each sale, the risk of misuse that could lead to human rights abuses and/or internal repression is assessed by following the same process that is intended to ensure that their supply complies with applicable export control regulations and international sanctions.

#### 2. Human rights governance

The aim of the human rights risk map is to identify IDEMIA's solutions, and their usage cases, that could :

- i) Have a negative impact on the human rights or fundamental freedoms of the populations of the countries in which they are deployed, in the event of misuse by their end-user (for example, a civil registration system used to support discrimination against part of the population), or
- ii) Be used in a context that includes practices contrary to human rights, without these being linked to the use of the products in question (for example, the sale of terminals enabling people to register to vote in a country where the elections are subsequently marred by irregularities).

i) Only the risk indicated in i) is included in the vigilance plan. Risk ii) has been identified as a reputation risk for IDEMIA, but not as a risk for third parties as a result of IDEMIA, to the extent that there is no causal link between IDEMIA's actions or products and human rights violations. Nevertheless, IDEMIA has implemented risk assessment and mitigation measures for both risks. They are based on a new form of internal commercial governance: all business opportunities that meet certain criteria (described below) must be reviewed by an ad hoc committee, i.e. the Human Rights Committee, and then validated by IDEMIA's Chief Executive Officer or by IDEMIA Group's Supervisory Board, as relevant.

IDEMIA's human rights governance applies to all Group entities. It applies to both new opportunities and renewals, in the following cases :



#### Composition of the Human Rights Committee

- › Pour toutes les divisions : toute opportunité commerciale concernant un pays fortement sanctionné par les Etats-Unis et/ou l'Union Européenne (la liste inclut notamment les pays visés par un programme de sanctions de l'Union européenne comportant une interdiction d'exportation de matériels pouvant être utilisés à des fins de répression interne).
- › Pour toutes les divisions : tout projet pour lequel une licence d'exportation au titre de l'article 5 du règlement européen n°821/2021 est susceptible d'être requise.
- › For government projects only : those which include products identified as presenting a significant human rights risk, when the country of deployment has a democratic index below a certain threshold (the democratic index that we use is the one published annually by [the Economist Intelligence Unit](#)). Two thresholds have been selected: one at 4 (countries with a score below 4 are considered authoritarian regimes) and one at 7 (countries with a score above 6 are considered democracies - imperfect below 8 and perfect above).

- › Any project that does not fall into the above categories, but for which a significant risk has been identified (ongoing conflict in the country, geo-political situation, etc.)

In each of the above cases, a meeting of the Human Rights Committee is organised. The Committee analyses the human rights risks presented by the project in light of :

- › the country's political situation, its history of human rights violations and any upcoming elections,
- › the perimeter and characteristics of the system to be deployed by IDEMIA, as well as the end use specified by the customer, and
- › the practical feasibility of misappropriation in view of the intended use.

The Committee draws up a recommendation on whether or not to go ahead with the proposed project, and submits it to the Group's Chief Executive Officer or Supervisory Board, as relevant, for a final decision.

### **3. Assessment procedure for third parties (distributors, agents, etc.)**

Any third party enabling IDEMIA to obtain, retain or conduct business (consultant, distributor, agent, joint venture or consortium partner, etc.) is subject to a validation procedure that involves a multidimensional risk assessment. The Group Chief Compliance Officer must approve all new (and ongoing) relationships with such third parties, on the basis of a complete file setting out the reasons for their use and the tasks with which they will be entrusted. A risk score is then calculated, notably considering the type of third party in question, the country in which it is planned that the said third party will carry out its activities in relation to IDEMIA, and its mode of remuneration.

Depending on the score, the following actions are initiated :

- › Level 1 : Database searches for sanctions, politically exposed persons and public entities
- › Level 2 : Level 1 + review of negative references / mentions from the viewpoint of corruption
- › Level 3 : Level 2 + more extensive CSR analysis

- › Level 4 : Full due diligence report undertaken with an external service provider

Beyond level 3, the reviews include a human rights dimension.

This assessment is updated every 12 months.

### **5.2.2.2. Risk mitigation measures**

IDEMIA has implemented four types of risk mitigation measures:

#### **1. Duty to advise :**

Duty to advise: as mentioned above, IDEMIA is involved in a number of projects led and/or financed by institutional actors. Some have published recommendations for governments or companies involved in such projects, on how best to structure them so as to ensure respect for the human rights of the people affected by the project. Examples include the World Bank's [Principles on Identification for Sustainable Development](http://documents.worldbank.org/curated/en/470971616532207747/Principles-on-Identification-for-Sustainable-Development-Toward-the-Digital-Age), to which IDEMIA contributed via the Secure Identity Alliance, and USAID's [Identity in A Digital Age: Infrastructure for Inclusive Development](https://www.usaid.gov/sites/default/files/2022-05/IDENTITY_IN_A_DIGITAL_AGE.pdf). IDEMIA takes these recommendations into account and advocates for their implementation to its customers with regard to the projects in which IDEMIA is involved.

2. Principles on Identification for Sustainable Development: Toward the Digital Age (English). Washington, D.C.: World Bank Group, 2021. <http://documents.worldbank.org/curated/en/470971616532207747/Principles-on-Identification-for-Sustainable-Development-Toward-the-Digital-Age>.

3. Identity in A Digital Age: Infrastructure for Inclusive Development, USAID Center for Digital Development, 2017. [https://www.usaid.gov/sites/default/files/2022-05/IDENTITY\\_IN\\_A\\_DIGITAL\\_AGE.pdf](https://www.usaid.gov/sites/default/files/2022-05/IDENTITY_IN_A_DIGITAL_AGE.pdf).

## IDEMIA's recommendations for biometric technology in the identity domain

Governments are increasingly relying on biometrics (facial, iris or fingerprint recognition) in order to secure access to public services, whether online or in person. The main motivation of States with regard to setting up this type of system is generally to reduce the risk of identity fraud (for example, if a State distributes fertilizer to farmers for their crops, to prevent ineligible people from collecting the fertilizer and then selling it on to farmers).

The error rate for authentication using biometric technologies is considerably lower than that of other techniques, such as verifying a person's identity using the naked eye, based on a photo on an identity document. It is for this reason that the World Bank and USAID fund projects to set up biometric identity registers and e-IDs, particularly in Africa. They improve access to public services and the inclusion of citizens.

Certain precautions must be taken when rolling out biometric systems :

- › When setting up the registers (biometric data acquisition phase), the system may erroneously - but with a low probability - consider that a person already exists ("false duplicate"). In such cases, an administrative inquiry is then normally carried out to rule out the risk of fraud, and to avoid biometric duplication. A person should not be excluded from registration solely on the basis of the detection of a duplicate.
- › At the moment when the person wishes to access a service, it is possible that he or she might not be recognised, due to a degraded network access or for other technical reasons. Nevertheless, IDEMIA's technologies have a very low error rate (< 0.5% for fingerprint re-

cognition, according to the latest [NIST](#) assessments). This error rate is higher for people with severely damaged fingers, but again remains very low. Skin colour has virtually no impact on the performance of IDEMIA's biometric identification and other algorithms, which are regularly rated as the fairest on the market.

Here too, IDEMIA recommends implementing a remediation procedure to enable access in another way, either using another type of biometrics (authentication by fingerprint or facial recognition), or reverting to the pre-biometrics method (in general, checking of a person's identity by an authorised agent on the basis of a photo in an identity document).

- › The implementation of these systems should not have the effect of depriving part of the population of access to public services on a discriminatory or indirect basis..
- › Digital identification should not be the only means of accessing basic goods and services, particularly when a lack of access due to technical error is likely to infringe upon the human rights of the people concerned or could cause them vital harm.
- › Finally, insofar as these systems involve the collection and use of sensitive biometric data, IDEMIA recommends that the roll-out of such systems be preceded by an impact study in terms of confidentiality, data protection and human rights.

IDEMIA systematically promotes these recommendations to its customers and works actively to integrate them into the best practice guides and recommendations published by the working groups in which it participates.

## 2. Organisational measures:

a) IDEMIA has two compliance networks:

- A Trade Compliance network of over 50 people.
- An export control and economic sanctions network with two experts on the Group level, supported by a network of over 50 correspondents.

b) In application of the human rights governance described above, IDEMIA may decide not to submit offers (or to refuse an order) or to propose to the prospect /

customer a modification of the scope of the system, in order to reduce the risk.

c) Furthermore, IDEMIA reserves the right to suspend or terminate a contract should it be established that the other party is committing serious violations of human rights and fundamental freedoms, whatever the legal basis (national or international), in connection with the goods and services covered by the contract.

d) The due diligence carried out in application of its export control and economic sanctions compliance

programme may lead IDEMIA to reject a proposed operation, or to formally consult the authorities and, if necessary, apply for licences or authorisations.

e) When a third party enabling IDEMIA to obtain, retain or conduct its business activities presents an excessively high risk of misappropriation, it is not validated by the Group Trade Compliance Officer. For certain types of third parties (e.g. agents, consultants), the Finance Department is prohibited from making any payment unless the amount and beneficiary have been previously validated by the Trade Compliance Department, which ensures compliance with this rule.

› Contractual measures :

a) Wherever possible, IDEMIA includes an export control clause in its contracts :

- Enabling the contract to be suspended or terminated if the other party is placed on a sanctions list or if new country sanctions or export restriction measures render the performance of the contract illegal, and
- Prohibiting the transfer of products to entities or countries under sanctions, on pain of termination of the contract.

b) Moreover, contracts between IDEMIA and distributors stipulate that the latter are prohibited from selling certain technologies for the most sensitive uses. They are also required to comply with [IDEMIA's Code of Ethics](#).

IDEMIA also asks its distributors to grant it a right of audit, thereby enabling it to verify the compliance with this provision.

### 3. Training :

Our technical and sales teams are regularly trained in export control and human rights issues. This training notably recalls the warning signs that should prompt the commercial teams to be extra vigilant regarding the risk of misappropriation of IDEMIA products.

#### 5.2.2.3. Follow-up mechanism



For the second consecutive year, IDEMIA has been awarded the highest distinction in terms of EcoVadis certification (Platinum).

EcoVadis is an organisation that offers a sustainable assessment methodology that serves to determine the extent to

which a company has integrated CSR principles into its activities and management system. The EcoVadis assessment covers a wide range of non-financial management systems, including environmental impacts, labour and human rights, ethics and sustainable procurement..

In addition, IDEMIA has three monitoring indicators relating to the risk of misappropriation of its products for use in connection with human rights abuses:

› Number of export control / human rights training courses :

	2020	2021	2022
Number of training courses	26	38	31
<b>Total workforce</b>	<b>164</b>	<b>294</b>	<b>398</b>

› Decisions taken by IDEMIA's Chief Executive Officer on projects submitted to him in the context of human rights commercial governance

It should be noted that governance was set up in February 2022 with a restricted scope (a single product, several usage cases), then extended in November 2022 (several products, each with several usage cases).

Decisions	2022
Approved projects	4
Conditionally approved projects	3
Rejected projects	0
<b>TOTAL</b>	<b>7</b>

› Number of third parties reviewed in application of risk mitigation measure 2.e):

Number of analyses performed	2022
Level 3	94
Level 4	15
<b>TOTAL for all 4 levels</b>	<b>201</b>

#### 5.2.2.4. 2023 outlook

IDEMIA plans to carry out an initial review of its human rights governance in order to assess whether or not its scope needs to be extended.

In addition, IDEMIA plans to integrate its recommendations on identity system deployment more systematically into its relevant sales brochures.



### 5.3. Risks relating to suppliers and subcontractors

#### 5.3.1. Risk mapping

The Purchasing Department monitors the social commitment of IDEMIA's suppliers and subcontractors. In addition to considering their economic, technical and quality performance as part of the selection process, the Purchasing Department ensures that suppliers and subcontractors meet the Group's expectations in terms of respect for human rights, the environment and all local or international regulations applicable to their activities.

The analysis and ranking of supplier and subcontractor due diligence risks is based on the following criteria :

- › Type of purchases made and category of products or services purchased,
- › Country in which the supplier or subcontractor operates,
- › Purchasing volume within IDEMIA's purchasing portfolio.

Based on purchasing volumes, the groups are the following:

Group	Implemented actions
Group 1 : Key suppliers	<ul style="list-style-type: none"> <li>› CSR assessment by ECOVADIS or equivalent assessment</li> <li>› Signature of IDEMIA supplier <a href="#">code of conduct</a> or equivalent provisions</li> <li>› CSR clause included in the contract</li> </ul>
Group 2 : Annual purchasing volume > €50,000	<ul style="list-style-type: none"> <li>› Signature of IDEMIA supplier <a href="#">code of conduct</a> or equivalent provisions</li> <li>› CSR clause included in the contract</li> </ul>
Group 3 : Annual purchasing volume < €50,000	<ul style="list-style-type: none"> <li>› Terms of order referencing the supplier code of conduct</li> <li>› CSR clause included the in contract (if a contract)</li> </ul>

IDEMIA has set up a supplier management programme, the IWAY partner programme, and is gradually strengthening it to involve its entire supply chain in CSR issues. Topics relating to the duty of care are included in this programme.

The types of suppliers integrated into our programme include :

- › Direct suppliers and subcontractors (production): these include key manufacturing suppliers and subcontractors, as well as suppliers of raw materials, equipment and spare parts.
- › Indirect suppliers and subcontractors (excluding production): these are local suppliers and subcontractors mainly dedicated to the sites where the Group operates, such as catering, cleaning, security, temporary employment agencies or facilities management.

The assessment of supplier-related risks, taking into account the sensitivity of purchasing segments, has enabled us to identify the following issues :

- › Environment: impact of suppliers' activities and supply chains on the environment,
- › Human rights: respect for human rights, prevention of discrimination among suppliers, absence of child labour,
- › Health & Safety: a supplier's failure to ensure the safety of its employees and subcontractors,
- › Ethics and Responsible Purchasing: risk of procurement of minerals from sources that do not respect human rights or that finance armed conflicts, and risk of corruption.

[IDEMIA's Ethics Charter](#), updated in 2022, confirms the integration of these criteria in the selection and management of suppliers.

At this stage, IDEMIA is rolling out its analysis and monitoring procedures, as well as its remediation measures, mainly on its Tier 1 suppliers. Nevertheless, if it is clear that a Tier 2 supplier provides the essential part of the ordered service, IDEMIA applies the same rules to it.

### 5.3.2. Assessment and monitoring procedures

The identification, assessment and control of a risk to a specific supplier are based on :

- › Periodic supplier audits: 30 audits were carried out in 10 countries in 2022,
- › Operational data from CSR supplier assessments, which we outsource to a third party, EcoVadis. This enables suppliers to be made aware of and assessed on subjects including the Environment, Human Rights (including Health and Safety), Ethics and Responsible Purchasing,
- › Periodic supplier performance reviews: in 2022, more than 30 performance reviews were carried out, incorporating the results of EcoVadis assessments,
- › A “trade compliance” validation procedure for the creation of new supplier accounts,
- › In addition, IDEMIA checks that its suppliers do not appear on human rights lists such as the UFLPA Entity List (Uyghur Forced Labour Prevention Law Entity List), published by the United States, which lists companies suspected of using forced labour involving Uyghurs.

### 5.3.3. Mitigation measures

Risk prevention or mitigation actions are based on:

- › The commitment of suppliers to the provisions of our [supplier code of conduct](#), either by signing it or by presenting equivalent provisions in their management system,
- › Assessment by EcoVadis, or an equivalent third party,
- › The supplier's implementation of a corrective action plan in the event of an EcoVadis assessment result below IDEMIA's expectations, which may be followed by an IDEMIA audit to verify effective implementation,
- › Penalties ranging from a reduction of market share to termination of the relationship with the supplier.

Concerning the risk of the procurement of minerals from sources that do not respect human rights or that finance armed conflicts, IDEMIA encourages its suppliers to implement a strict selection process for so-called conflict minerals, and implements its duty of care in line with OECD recommendations through the provisions of our supplier code of conduct. IDEMIA asks suppliers to provide proof of implementation of a responsible minerals policy, in the form of a table corresponding to the models developed by the Responsible Minerals Initiative (RMI). Suppliers must also notify IDEMIA in the event of any changes or updates.

### 5.3.4. 2023 outlook

IDEMIA plans to gradually extend its assessment procedures beyond its Tier 1 suppliers.

More specifically for 2023, the following are planned :

- › roll-out of an updated supplier code of conduct, and
- › update of the CSR clauses included in our general purchasing conditions and contracts so as to reinforce contractual requirements vis-à-vis our suppliers.

These changes will apply to both new and existing suppliers, at the time of contract renewal.

## 5.4. Health, Safety and Human Rights risks for IDEMIA employees

### Risk mapping

The risk mapping with regard to employee health, safety and human rights has identified a number of risks, the main ones of which are presented below :

Risk category	Risk details
Protection of employees	Employee injury, workplace accident
Failure to protect the personal data of employees	Breach of the personal data of employees
Psychosocial risks	Fatigue within the teams and risk exposure Employee well-being
Discrimination	Exclusion from certain in-house opportunities Discrimination in hiring Wage gaps

IDEMIA has been a signatory of the United Nations Global Compact since 2006, and pays particular attention to issues relating to working conditions and the treatment of employees. The Group is therefore part of a universal commitment framework based on 10 principles relating to respect for human rights and international labour standards, environmental protection and the fight against corruption.

In view of the characteristics of IDEMIA's activities, the risk of child labour, forced labour and modern slavery has not been considered to have a sufficiently high



probability of occurrence with regard to IDEMIA employees to be included in the vigilance plan. However, this risk has been identified in relation to IDEMIA's suppliers (see dedicated section).

In addition, in countries where IDEMIA operates or does business, and in the course of their duties or while travelling, employees may be exposed to security risks such as assaults, attacks or kidnappings. This type of risk is heightened in countries that are experiencing political instability or security tensions.

IDEMIA has anchored the roll-out of measures to reduce the exposure of its employees to occupational risks in its operational processes. These risks and the corresponding action plans are addressed proactively at all levels of the organisation.

#### 5.4.1. Protection of employees: risk of physical harm to employees

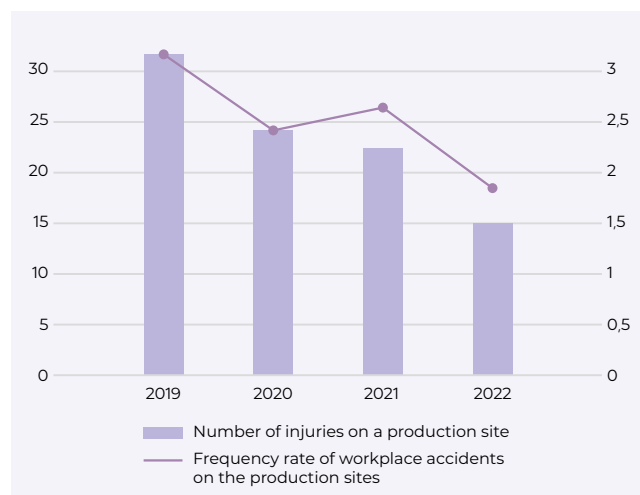
##### 5.4.1.1. Assessment and monitoring procedures

The Group has set up tools and processes to collect monthly indicators on accidents and absences at its various sites. Corrective and preventive actions to reinforce measures already taken can then be implemented on local and/or global levels if necessary.

Regular audits are carried out through ISO 45001:2018 certification at the main industrial sites, thereby enabling the company to provide its employees with safe and healthy workplaces while preventing work-related injuries and pathologies, and proactively improving their health and safety performance. 10 IDEMIA sites are already ISO 45001:2018 certified.

ISO 45001:2018 certified sites	Certification expiry date
Santiago, Chile	19.11.2023
Shenzhen, China	29.12.2023
Bogota, Colombia	18.11.2023
Yumbo, Colombia	20.06.2024
Dijon, France	27.12.2024
Vitré, France	22.12.2023
Noida Head Office, India	15.08.2024
Noida Smart Chip Biometric, India	06.12.2023
Milan, Italy	24.03.2026
Ostrava, Czech Republic	14.11.2025

#### List of assessed indicators and results:



##### 5.4.1.2. Mitigation measures

A Group-wide Health & Safety manual has been drafted in order to prevent incidents in the workplace and to provide applicable guidelines. It can be accessed by any employee on the company intranet.

This manual is intended to establish a minimum standard of practice in occupational health and safety, over and above locally applicable regulations.

It is regularly reviewed by the Health, Safety and Environment team and employee representatives.

This plan is based on :

- › Compliance with local health and safety regulations,
- › Access to procedures and documentation: Health & Safety manual, risk assessment and action plan management form,
- › Training the network of people in charge of the subject on the sites,
- › Central coordination of local organisations.

In addition, the Group's Safety Department, which reports to the Chairman, keeps a close and constant watch on any tension, threats and health risks that employees may encounter in the course of their professional activities.

Information is communicated to employees in the form of an "International Security Review" newsletter, distributed several times a month in keeping with current events. It includes quick access to the "Procedure for protecting employees on business trips", and updates the various events likely to constitute a risk, according to the regions in question.

Among other things, it reiterates the emergency procedures applicable in case of need.

Group employees also have access, via the Group intranet, to a country-specific mapping of the level of security risks. In case of travel to a high-risk country, a specific procedure is implemented before the trip so as to inform the employee and enable the implemen-

tation of specific protection measures when necessary.

In addition, travel must be organised using a tool that is currently being rolled out across the Group, which will enable IDEMIA to be proactive in the event that something happens. A helpline is available to all employees to help them solve any problems that may arise during a trip.

## **5.4.2. Protection of employees: risk of breach of the personal data of employees**

### **5.4.2.1. Assessment and monitoring procedures**

IDEMIA ensures that its employees comply with applicable regulations on the processing of personal data. The implemented assessment and monitoring procedures are those required by the applicable law: assessment of the maturity of data protection compliance, internal control, audit, controls performed by the data protection officer. In addition, in the absence of provisions relating to the protection of employees' personal data in certain countries, IDEMIA considers the procedure anticipated in the GDPR to be the most binding reference in terms of personal data protection. It is therefore asking its entities located in non-EU countries to comply with this regulation (cf. Confidentiality policy).

### **5.4.2.2. Mitigation measures**

The risk mitigation measures presented below are specific to the personal data of IDEMIA employees. Further measures to mitigate risks relating to third-party personal data are described in the section dedicated to human rights risks associated with IDEMIA's activities.

IDEMIA employees may be exposed to risks concerning the management of their data in relation to the Group's activities :

- › The personal data of the employees are protected throughout their careers with IDEMIA,
- › There is no upstream retention of the personal data of job applicants. Only the CV is kept for one year with their consent.
- › As part of an employee departure procedure, employees are asked to purge their computer equipment of all personal and confidential data.

Employees have access to a GDPR adviser: "Data Privacy Coordinator" by department and to the Group Data Protection Officer (Group DPO) on the Group level.

## **5.4.3. Psychosocial risks**

Whatever the nature of their activity, employees can be exposed to stressful situations linked to their working conditions, organisation or inter-professional relations, which can have an impact on their well-being within the company.

The prevention and mitigation of these risks build on action on several levels :

- › Periodic employee surveys,

- › Action plans resulting from these surveys,
- › Availability of a listening and assistance platform,
- › "Integrity Line" alert platform,
- › Set-up of training courses for managers,
- › Relays in the local human resources networks.

### **5.4.3.1. Assessment and monitoring procedures**

Every year, IDEMIA invites all of its employees to give their opinions on their professional experience through a confidential and anonymous survey covering a wide range of subjects. This survey covers, among other things, the following topics :

- › Quality of life at work,
- › Work environment,
- › Learning and development opportunities,
- › Relays in the local human resources networks.

This annual survey is carried out with the help of an external company, guaranteeing the anonymity of responses from all employees. It enables IDEMIA to identify strengths and areas for improvement, while providing all managers with analyses with varying degrees of granularity, leading to the implementation of action plans based on the results obtained each year.

List of assessed indicators and results :

- › Criteria scores obtained in the annual internal survey open to 100% of the employees. For example:
  - 80% (+3 points vs. 2021) of managers recognised for their level of support, exchange and recognition by their teams,
  - 81% (+5 points vs. 2021) of employees feel committed,
  - 87% (+5 points vs. 2021) of employees consider that they have the means to make the necessary decisions with regard to performing their job.
- › 100% of employees have access to the Integrity Line alert platform.
- › 100% of employees have access to the Employee Assistance Programme (EAP).

### **5.4.3.2. Mitigation measures**

Several initiatives are the direct result of satisfaction surveys, helping to prevent this type of risk.

The roll-out of a workplace well-being plan has been in progress since 2022. It is divided into two parts.

Firstly, a monthly thematic information programme has been set up with the main aim of giving employees tools to improve their level of well-being. Each month, articles containing advice and resources on a particular topic related to well-being are made available to employees. A free online seminar on the topic in question and local initiatives complete the overall offering.

A platform dedicated exclusively to an assistance programme for employees and their families was deployed

in 2022 and now completes this system. It is accessible to 100% of employees, including plant operators, through a hotline that guarantees anonymous exchanges.

In addition, all employees can use the Integrity Line platform (see section on the Alert Mechanism) in order to report any distressing situation at work. This type of alert is systematically analysed by an ad hoc committee.

#### 5.4.4. Risk of employee discrimination

The main aspects of discrimination risk are related to :

- › Hiring,
- › Obstacles to internal mobility or career development,
- › Wage gaps.

##### 5.4.4.1. Assessment and monitoring procedures

As part of our work on Diversity, Equity & Inclusion (DEI), a “DEI index” was set up in 2022. This index is based on a questionnaire sent to all employees on the subject of DEI during the annual “ISpeakUp” commitment survey. The results are analysed by team in an effort to identify possible malfunctions and implement corrective action plans accordingly.

As far as salary increases are concerned, the “Dashboard Salary Review” is used to precisely monitor the distribution of salary increases with regard to all employees.

The Group has set measurable targets for all countries in which it operates by 2025 :

- › Women in our workforce: from 31% to 34% (+3 points),
- › Women in management: from 24.7% to 29% (+4.3 points),
- › Women in “Tech” (engineering positions): from 15.5% to 18% (+2.5 points),
- › DEI index (from our annual “ISpeakUp” survey) : from 82% to 85% (+3 points).

##### 5.4.4.2. Mitigation measures

These various analyses have given rise to a Diversity, Equity & Inclusion strategy. This strategy involves implementing several pillars leading towards inclusive workplaces.

Firstly, the recruitment process has been adapted to promote the inclusion of minorities.

On a global scale, the Women in IDEMIA Network (WIN) develops initiatives dedicated to encouraging inclusion, diversity and equity through culturally adapted events and training, and in order to limit unconscious biases among managers.

“Employee Resources Groups” (ERG) initiatives have been deployed in the United States :

Des initiatives « Employee Resources Groups » (ERG) ont été déployées aux Etats-Unis :

- › LEAGUE (LGBTQ+ Employee and Ally Group United for Equality): offering a professional network within the LGBTQ+ community,
- › REACH (Remote Employee And Contributor Hub) : designed to create a welcoming community for employees working remotely,
- › LIFE (Leading IDEMIA's Future Executives) : providing young employees with a space for peer networking and experience sharing.

##### 5.4.4.3. 2023 outlook

An extension of the ERG LEAGUE, REACH and LIFE initiatives is under study in several regions of the world.

Awareness training on unconscious biases will be provided for all managers, to contribute to an inclusive working environment. Specific training for managers will also be rolled out.

Unlock the world  
**make it safer**