

# Modern Slavery Statement

Financial year 2024

# 1. Organizational structure and business

IDEMIA Group (IDEMIA) is a multinational technology company headquartered in Courbevoie, France. Since our founding, IDEMIA has made it our mission to make the world safer through our deep-rooted experience in **biometrics** and **cryptography**. Today, we lead our industries with our cutting-edge expertise. Our technology leadership makes us the partner of choice for hundreds of governments and thousands of enterprises in more than 180 countries, including some of the biggest and most influential brands in the world.

Each of our three market-leading businesses is powered by our proprietary solutions in the fields of biometrics and cryptography:

- **IDEMIA Secure Transactions** is the leading technology provider who unlocks safer and easier ways to pay and connect.
- **IDEMIA Public Security** is a leading global provider of biometric solutions that unlock convenient and secure travel, access, and protection.
- **IDEMIA Smart Identity** leverages the power of cryptographic and biometric technologies to unlock a single trusted identity for all.

IDEMIA's 15,000 employees are spread over five geographical areas and six continents: Europe, Middle East and Africa, Asia-Pacific, North America and South America.

## 2. Statement

### 2.1. Regarding our business partners<sup>1</sup>

In 2006, IDEMIA reinforced its corporate responsibility agenda by becoming a signatory to the Ten Principles of the UN Global Compact, the world's largest voluntary corporate citizenship initiative, embracing and enacting a set of core values in respect of human rights, labor practices, anti-corruption and the environment.

In accordance with its pledge to the UN Global Compact, and the United Nations Sustainable Development Goal 8 Decent Work & Economic Growth, IDEMIA supports and respects the protection of internationally proclaimed human rights and is committed to ensuring that through its own operations, its products and its supply chain it avoids complicity in human rights abuses. Thus, IDEMIA is committed to ensuring that modern slavery is not present in its own organization or in its supply chain. IDEMIA promotes the respect of human rights throughout its sphere of influence and trains its employees on fundamental human rights.

This statement summarizes the steps that IDEMIA has taken to minimize the risks of modern slavery in its operations and supply chains in 2024. It constitutes IDEMIA's modern slavery statement according to the requirements of the UK Modern Slavery Act 2015.

To date, IDEMIA has had no reports of modern slavery within its supply chain.

### 2.2. Regarding our employees<sup>2</sup>

<sup>1</sup> In this statement, the term 'business partners' refers to what the CSRD defines as 'workers in the value chain'.

<sup>2</sup> In this statement, the term 'employees' refers to what the CSRD defines as 'own workforce'.

Regarding our employees, we are committed to fostering a workplace that upholds the highest ethical standards and respects human rights. We recognize that modern slavery, including forced labor, human trafficking, and exploitative working conditions, has no place in our business or supply chain.

As part of our people management strategy, we:

- **Ensure Fair Employment Practices:** All employees and contractors are hired through legal and transparent recruitment processes, with clear terms of employment, fair wages, and safe working conditions.
- **Maintain zero-Tolerance for Forced Labor:** We strictly prohibit any form of forced or compulsory labor, ensuring that all work is voluntary and free from coercion.
- **Promote ethical Recruitment & Supply Chain Oversight:** We work only with ethical recruitment agencies and partners who align with our commitment to human rights and labor laws.
- **Encourage reporting & Accountability:** Employees and stakeholders are encouraged to report any concerns regarding unethical practices, with assurance of protection through our whistleblowing policy.
- **Provide training & Awareness:** We provide ongoing training for employees, managers, and suppliers to recognize and prevent modern slavery risks.

### 3. Policies in relation to Modern Slavery

Operating in many markets and countries, directly or through partners, IDEMIA pays special attention to the risk of human rights violations: forced labor, child labor or other slavery-like practices, unsafe or unhealthy working conditions, discrimination, underpayment for labor or services provided. IDEMIA has deployed an organization, procedures and training to ensure that its operations consistently meet the highest ethical requirements.

Through a combination of global and country-based recruitment and labor policies, IDEMIA fulfils its commitment to keep its people safe from harm and abuse. IDEMIA is committed to maintaining a work environment, at all its sites, that respects the dignity, safety and security of all employees, that is favorable to good job performance and is free from all types of workplace violence, bullying and harassment.

IDEMIA's global Ethics Charter is endorsed by the Group co-CEOs and sets the tone for how everyone is expected to behave at IDEMIA, regardless of job role or location in the world. The Ethics Charter is accessible to IDEMIA's people in five languages: French, English, Spanish, Chinese and Portuguese.

The IDEMIA Investigation and Remediation Protocol and Integrity Line allows questions about ethical matters, or reports of misconduct to be reported confidentially. This protocol, accessible to all employees via the company intranet, is available in French, English, Spanish, Chinese and Portuguese. IDEMIA suppliers are encouraged to implement their own reporting procedure.

The Company's Supplier Code of Conduct contains supply chain expectations and was developed with reference to prevailing international standards such as the ILO Codes of Practice, the Universal Declaration of Human Rights, Social Accountability International and the Responsible Business Alliance Code of Conduct.

IDEMIA supports the efforts of human rights organizations to end violence and atrocities in conflict affected and high-risk areas, where the major driver of this violence is the natural abundance of the minerals tin, tungsten, tantalum and gold (3TG). IDEMIA's Conflict Minerals Policy guides its work to ensure that it does not

knowingly source any product containing 3TG sourced in conflict-affected areas, where the risk of human rights abuses is high.

## 4. Due diligence processes

### 4.1. Risk assessment and mitigation

IDEMIA works to identify areas of its business that may be at risk of modern slavery and pays particular attention to avoiding risks within the supply chain that may be outside of its direct control. IDEMIA's supply chain risk mapping is reviewed each year to:

- Incorporate potential new risks, the probability of occurrence, the impact and level, the action plan and the risk reduction objective
- Reassess the risks already identified and the relevance/effectiveness of the action plan.

Through its global CSR program, IMPACT, IDEMIA has committed to increasing the number of suppliers assessed for CSR performance by 2024, thereby furthering its efforts to identify and mitigate risk.

In compliance with the French law on due diligence, IDEMIA publishes its vigilance plan on an annual basis, to regularly update its progress in the area of duty of vigilance.

### 4.2. Business Opportunity Review

As we put humans first in our values, one of our priorities is to make sure that when it comes to human rights and fundamental freedoms, we comply with the same standards everywhere in the world. In this regard, our commitment is materialized by IDEMIA's adherence to the United Nations Global Compact Initiative.

These principles are upheld in all our policies that relate to the conditions of work of our employees, in the way in which we structure our supply chain and in the way in which we develop and market our solutions.

In practice, IDEMIA defined governance rules to ensure each sensitive Business Opportunity is reviewed under the human right perspective with particular attention paid to child labor, modern slavery, conflict minerals, data protection and privacy and to the risk of misuse of our products.

### 4.3. Supply Chain monitoring

The Company's general purchasing conditions, including a requirement to adhere to the IDEMIA Supplier Code of Conduct, are included in supplier contracts. They reference IDEMIA's sourcing standards and the expectations of suppliers with regards to modern slavery.

88% of suppliers assessed scored above IDEMIA's threshold in the end of 2024, with the average score in the Labor and Human Rights category 16 points higher than the benchmark required by IDEMIA.

IDEMIA checks for supply chain risks, including those related to human rights and other CSR risks (health & safety, environment), through a formal, automated due diligence process. As part of the supplier onboarding process, suppliers are required to sign the Supplier Code of Conduct and for the ones above a defined threshold in spend, a dedicated screening of the company is performed. Key suppliers undergo additional CSR



assessments through EcoVadis, any supplier falling short of IDEMIA's requirements must work on corrective actions to meet the required benchmark. CSR performance is also integrated into the supplier annual scorecard. Key suppliers may be audited on site when relevant.

The IDEMIA Purchasing Academy includes modules on corporate social responsibility and legal compliance, to ensure that buyers are trained in the responsible and ethical sourcing of products and services.

The Supplier Quality Team controls that IDEMIA's CSR principles are effectively applied through audits of supplier facilities.

#### IDEMIA's Supplier Code of Conduct: Expectations of Suppliers

<b>DO NOT</b>	Use forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.
<b>DO NOT</b>	Place unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities.
<b>DO</b>	Provide workers with a written employment agreement in their native language that contains a description of terms and conditions of employment, and where applicable this must be made accessible prior to the worker departing from his or her country of origin.
<b>DO</b>	Ensure that all work is voluntary and workers are free to leave work at any time or terminate their employment.
<b>DO NOT</b>	Hold or otherwise destroy, conceal, confiscate or deny access by employees to employees' identity or immigration documents, such as government-issued identification or work permits, unless the holding of such documents is required by law.
<b>DO NOT</b>	Require employees to pay recruitment fees or other related fees for their employment.
<b>DO</b>	Hire employees under regular employment contracts in accordance with the laws applicable. All use of temporary, dispatch and outsourced labor must be within the limits of the local law and must not be used by suppliers to avoid their statutory responsibilities as an employer.
<b>DO</b>	Understand and act upon any applicable legal obligations in respect of slavery and human trafficking and to be cooperative of IDEMIA's efforts to ensure its own compliance.

#### 4.4. Whistleblowing system

IDEMIA has a system in place for receiving and processing alerts to enable all employees to play their part in upholding Group ethics and preventing risks.

The alert collection and processing system is part of the IDEMIA Group's ethics initiative. It offers employees a way to express their concerns, in addition to the existing whistleblowing channels such as their line manager, the employee representative bodies and any local systems in place. Employees in countries which have their own whistleblowing channel should use it as their first port of call.

The system is open to all IDEMIA Group employees and its business partners, both individuals and corporations. Use of the system is not mandatory. It is available in 17 languages, on the IDEMIA website <https://idemia.integrityline.app/>

## 5. Training and awareness

- CSR fundamentals training:
  - Online training module covering a range of CSR topics
- New starter induction:
  - Employee induction process includes ethical conduct expectations of both employees and employer at IDEMIA.
- Human rights training:
  - In-class or remote training on the Human Right governance

## 6. KPI's

- 8399 employees have received the Corporate Ethics training at IDEMIA in 2024
- Since October 2020:
  - Launch of IDEMIA Integrity Line, an online platform for employees to report violations of IDEMIA's Corporate Ethics Policy
- Recruitment processes:
  - Managed in compliance with all applicable local, national and regional laws.
- Recruitment agencies:
  - Global agreements with major recruitment agencies, with contracts managed at IDEMIA corporate level, and terms and conditions subject to full purchasing and legal review.
- External audits:
  - 53 audits were conducted in 10 countries by the Supplier Quality team in 2024.
- Internal audits:
  - No incidences of forced labor identified at IDEMIA sites.
- CSR audits:
  - Self-assessment questionnaire for sites, checking practices related to health & safety, environment, ethics and labor.
  - Elements based on SA8000 criteria to check for child labor and forced labor.
- Social systems certification:
  - SA8000 at IDEMIA Noida, India
- ISO Certification
  - 2024: 4 IDEMIA countries are certified ISO37001 (anti-corruption management system)
- EcoVadis Certification

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IDEMIA has been awarded the Gold EcoVadis certification.

This document has been reviewed and approved by the Group co-CEOs of IDEMIA. It will be reviewed annually and updated as necessary.

Yves PORTALIER  
SVP Group CSR

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