

JANUARY - DECEMBER 2023

---



# **IDEMIA 2023 Vigilance Plan**

# Unlock the world





# Contents

1. Introduction .....	4
2. Perimeter .....	6
3. Governance and management of the vigilance plan .....	9
4. Alert mechanism .....	10
5. Risk mapping .....	12
6. Risk assessment, mitigation actions and areas for improvement.....	15
6.1. Environmental risks .....	15
6.1.1. Climate risks related to IDEMIA's activities: carbon footprint linked to energy and atmospheric emissions	
6.1.2. Climate risks related to IDEMIA's activities: risks related to the transport of goods	
6.1.3. Risks of pollution of local ecosystems and degradation of biodiversity: waste production and management	
6.1.4. Risks associated with the use of polluting chemicals	
6.2. Human rights risks associated with IDEMIA's activities .....	19
6.2.1. Personal data and privacy risks	
6.2.2. Risks of IDEMIA's products being misused in a context of human rights violations (e.g.: discrimination, internal repression, etc.)	
6.3. Risks relating to suppliers and subcontractors .....	26
6.4. Health, Safety and Human Rights risks for IDEMIA employees.....	28
6.4.1 Protection of employees: risk of physical harm to employees	
6.4.2 Protection of employees: risk of breach of the personal data of employees	
6.4.3 Psychosocial risks	
6.4.4. Risk of employee discrimination	

# 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.

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") in a global manner while taking into account the Group's internal organisations and their development over the course of the year, but also those of its suppliers and subcontractors.

This plan breaks down as follows:

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























## IDEMIA CSR strategy: the 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	2023 progress
Environment		Reduction of our impact on the environment: 25% reduction of CO <sub>2</sub> 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	
Social		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	
Environment, Social		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	
Environment, Social		Coordinating a group initiative across all sites	
		Encouraging local community actions, mainly support for education	
Governance		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 2023 edition, the IDEMIA vigilance plan covers all of the Group's activities, with the exception of acquired subsidiaries. As their risk analysis and the identification of risk control measures have not been completed by the date of this vigilance plan, they are not included. IDEMIA's objective is to incorporate them into its next 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:

### Government

This segment addresses the following markets:

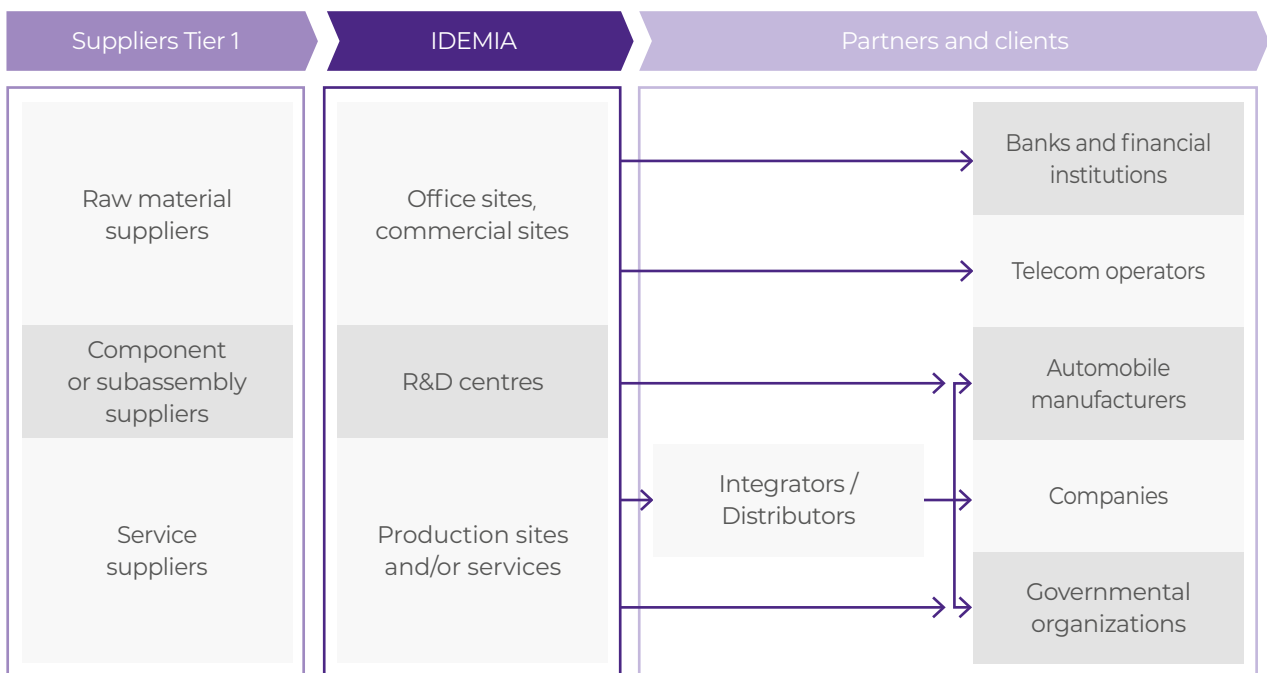
- › civil identity (government),
- › access control, passenger routing facilitation, passenger checks and public safety.

### Companies

This segment addresses the following markets:

- › payment services,
- › 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, 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 6.2.2.1 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,
- › Ethics and human rights,
- › Environment,
- › Health & Safety.



The development of this 2023 plan takes into account discussions with various stakeholders. It therefore takes into account feedback from customers, suppliers, employee representative bodies and a number of NGOs concerning 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/>

**IDEMIA**    ? FAQ    Inbox    English

## Welcome to the IDEMIA whistleblowing platform

You can report any incident within the company that violates applicable laws or the internal code of conduct. We appreciate your cooperation

Message from the President & CEO

*"The IDEMIA Group is founded on certain key values, among which respecting the principles of ethics is predominant. Professional standards, transparency, and integrity are values shared by all employees. They are the basis of our group's culture, and guide all of our activities. For most of us, these values are implicit. However, in a developing group which is recruiting several employees every year, it is important to state these values clearly and to share them. I am relying on each and every one of you to take these rules into consideration, and follow them during your daily activities. IDEMIA shall thus continue to enjoy the trust and confidence of its clients, employees, partners, and shareholders. Compliance with the Code of Conduct is indispensable to ensure sustainable development, as well as the harmonious growth of our group."*

Pierre Barrial  
President & CEO

[Submit an alert](#)

🔒 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, made up of 5 members appointed by the IDEMIA Group's Chief Executive Officer. 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.

TYPE OF ALERTS RECEIVED	2021	2022	2023
Allegations of fraud	4	4	3
Allegations of corruption	0	2	4
Allegations of conflicts of interest	2	3	6
Allegations of harassment	1	3	4
Allegations of favouritism	1	2	5
Non-compliance with the Ethics Charter	2	3	6
Inadmissible	1	0	5
<b>TOTAL</b>	<b>11</b>	<b>17</b>	<b>33</b>

DECISIONS	2021	2022	2023
Sanctions	4	6	9
Reminder of the policy and regulations	3	6	8
Dedicated training	1	1	2
No further action	2	4	9
Not applicable	1	0	5
<b>TOTAL</b>	<b>11</b>	<b>17</b>	<b>33</b>

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.

## 5 > Risk mapping

**F**or the 2023 edition of its Vigilance Plan and as part of its commitment to social responsibility, IDEMIA has drawn up a risk map specific to the areas covered by the Duty of Vigilance Act.

IDEMIA therefore called on a panel of internal stakeholders who identified the most important risks according to them, according to their skills on the themes addressed: environment, human rights in IDEMIA's business activities, supply chain and employee rights.

### Three criteria were used to prioritize the risks:

- › The probability of occurrence, i.e. the probability that the risk will occur in the more or less near future - assessed by the stakeholders using the following methodology:

<b>4</b>	<b>High</b>	The risk is likely to occur over the next 12 months
<b>3</b>	<b>Medium</b>	The risk is likely to occur in the next 3 years
<b>2</b>	<b>Low</b>	The risk is likely to occur in the next 8 years
<b>1</b>	<b>Very low</b>	The risk is likely to occur at a point more than 8 years in the future



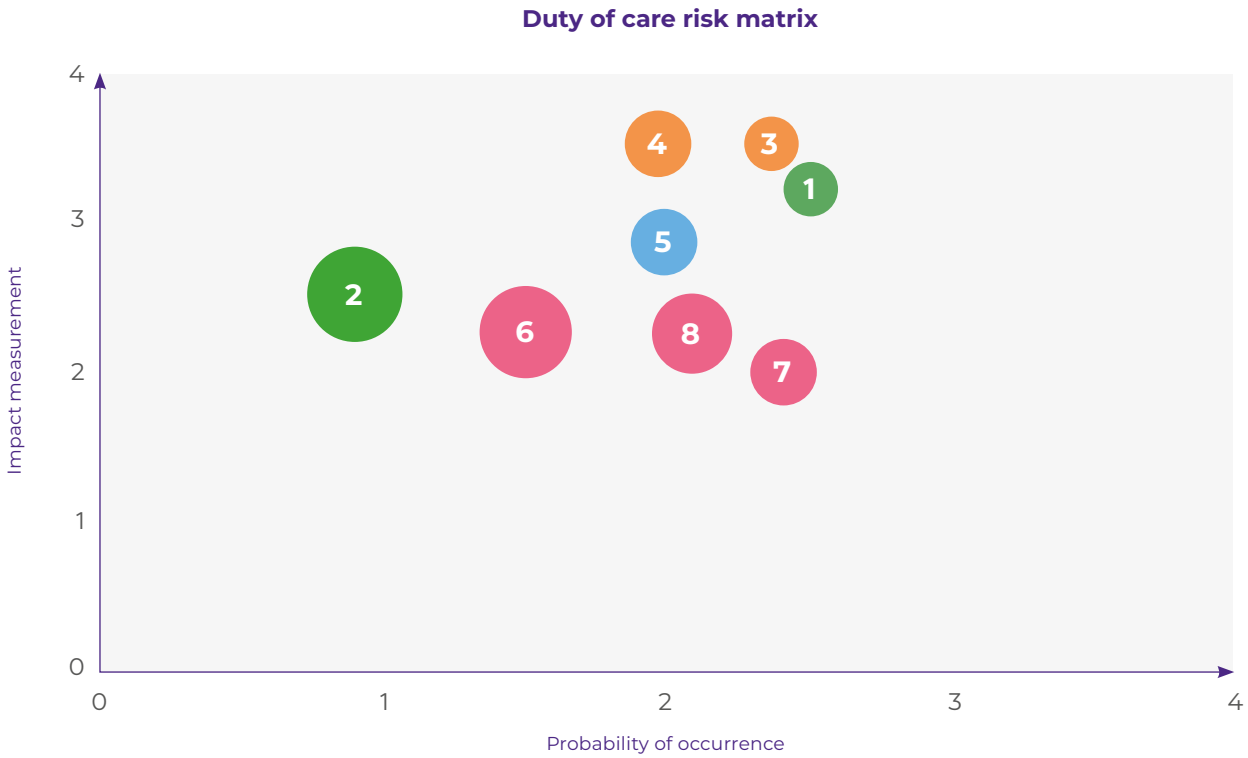
- › Measurement of the impact on third parties - assessed by the vigilance plan steering committee in a cross-functional manner, taking into account the diversity of IDEMIA's activities and the impact scale described in Appendix 1.

	<b>LOW 1</b>	<b>SIGNIFICANT 2</b>	<b>CRITICAL 3</b>	<b>CATASTROPHIC 4</b>
<b>Environment R1, R2</b>	The consequences would be minimal or easily manageable. Limited impact on ecosystems or communities.	The potential consequences are localised and may affect specific ecosystems or communities. Remediation efforts could remedy the impact.	The consequences could have a significant impact on ecosystems or communities, requiring significant resources for sanitation and recovery.	The potential consequences are considerable, affecting vast regions and causing serious and lasting damage to ecosystems and communities.
<b>Health &amp; Safety R6, R7, R8</b>	In the event of a health and safety issue, the impact would result in minor injuries or no injuries at all. Immediate and effective response measures are in place.	Potential injuries are localised and affect a small number of people. Adequate response measures can mitigate the impact.	The potential health and safety consequences could result in serious injury or illness, requiring significant resources for medical care and recovery.	The impact could lead to death or serious long-term effects on the health of a large number of people, requiring major medical intervention.
<b>Human rights R3, R4</b>	Minor violations that can be dealt with quickly without causing significant harm to people.	Potential human rights violations are localised and affect a limited number of people. Corrective measures could be taken to remedy these violations.	The consequences could result in significant and widespread human rights violations, requiring considerable efforts to address and rectify the impact.	The potential impact involves systemic and serious human rights violations, causing lasting harm to large numbers of individuals and requiring a comprehensive response.

- › The level of risk control, i.e. all of the internal control systems designed to mitigate a particular risk - assessed by the stakeholders using the following methodology:

<b>CONTROL LEVEL</b>	<b>RISK AWARENESS</b>	<b>RISK MITIGATION MEASURES</b>	<b>EFFICACY OF THE MEASURES</b>	<b>STABILITY OVER TIME</b>
<b>4 Maximum</b>	The description and assessment of risks and their scenarios are reviewed at an appropriate frequency.	Mitigation plans are updated. The progress of the actions is reviewed at an appropriate frequency and is in line with the objectives.	The evolution of risks is consistent with the objectives.	The result of the action is sustainable (procedure, quality standards, internal audit, etc.).
<b>3 High</b>	The description and assessment of risks and their scenarios are reviewed at an appropriate frequency.	Mitigation plans are updated. The progress of the actions is reviewed at an appropriate frequency and is generally in line with the objectives.	A target for positioning the risk on the map after mitigation is defined - the mitigation plan is consistent with the target.	
<b>2 Partial</b>	Risks and risk scenarios are described and assessed.	A treatment plan is being drawn up or has been finalised (responsibilities and deadlines have been set...).		
<b>1 Low</b>	Knowledge of the risk is informal or partial.			

The result of this risk mapping is presented below:



**Environmental risks**

- 1. Climate risks
- 2. Risks of pollution of ecosystems and degradation of biodiversity

**Human rights risks associated with IDEMIA's activities**

- 3. Personal data and privacy risks
- 4. Risk of misuse of products in a context of human rights violations

**Environmental, human and ethical risks related to suppliers and subcontractors**

- 5. Risks relating to the activity of suppliers and subcontractors

**Health, Safety and Human Rights risks for IDEMIA employees**

- 6. Risk of physical harm to employees
- 7. Risk of breach of the personal data of employees
- 8. Employee mental health risks: psychosocial and discrimination risks



# 6 Risk assessment, mitigation actions and areas for improvement

## 6.1. Environmental risks

As an industrial company, IDEMIA is an actor in the fight against climate change, through a short-term plan to reduce its emissions, essentially by reducing the impact of its operations by 2025. Medium- and long-term prospects will emerge in 2024. This topic will be developed in section 6.1.1.

As part of the risk mapping process, two environmental risks stand out:

- › 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:

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

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

#### 6.1.1.1. 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 CO<sub>2</sub> emissions, including Scopes 1 and 2 as well as part of Scope 3 as defined by the Greenhouse 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.

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.

In 2023, IDEMIA worked to include its Scope 3 in the measurement of its greenhouse gas emissions for 2022, in order to obtain a complete view of its climate impact. To this end, IDEMIA worked with a company specialising in the measurement of corporate emissions. The results are expected in the first quarter of 2024.

#### 6.1.1.2. Mitigation measures

The reduction programme for Scopes 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.

Beyond the ratio of emissions induced by IDEMIA and its value chain, the current carbon balance will enable the company to define medium- and long-term greenhouse gas emission reduction targets. In this context, IDEMIA has trained its purchasing teams to analyse the impact on the Scope 3 of suppliers.

In addition, the company's various business sectors have produced life cycle analyses (LCAs) to measure the environmental impact of their products, notably with regard to climate. LCAs are a way for companies to measure the impact of their products, and above all to identify areas for attention and product design improvements.

Lastly, the company has actively launched the use of cloud elasticity. This dynamic resizing of resources according to demand enables IDEMIA to efficiently allocate and deallocate IT resources. This scalability guarantees optimum performance and profitability by providing the right amount of resources when needed and avoiding over-provisioning during periods of lower demand. In energy terms, this means greater efficiency and therefore a reduced impact on the climate.

### 6.1.1.3. 2024 outlook

For 2024, after completion of the carbon footprint, IDEMIA will define a carbon emission reduction plan aligned with the ambitions of the climate objectives of the Paris Agreements. IDEMIA has already committed to submitting this plan by SBTi (Science-Based Target initiative) during the year.

## 6.1.2. 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.

### 6.1.2.1. 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.

### 6.1.2.2. Mitigation measures

Following on from 2022, IDEMIA has accelerated the share of sea freight as an alternative to air freight

(reducing greenhouse gas emissions by more than 20 times compared with air freight) for the transport of most of the raw materials and components. At the end of 2023, 78% of the transport volumes of these raw materials and components was transported by sea, representing an increase of 3 percentage points compared with 2022. In total, sea and road transport modes increased by 2 points between the last two financial years, reaching a share of 86% at the expense of air freight.

### 6.1.2.3. 2024 outlook

A series of initiatives have been approved for implementation in 2024. Their aim is to reduce greenhouse gas emissions linked to the transport of products:

- › IDEMIA continues to monitor the market and regulations in order to regularly assess the impact of transport plans in terms of costs and greenhouse gas emissions.
- › Close monitoring of the supply indicators for certain raw materials and components used in secure transactions. The use of alternative modes of transport compared to air transport is studied on a case-by-case basis so as not to waste opportunities.
- › Tests will be carried out to bring the sources of supply of certain components closer to the IDEMIA factories. This will reduce the distances travelled by components and pave the way for new thinking on the modes of transport used.

## 6.1.3. 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.

### 6.1.3.1. 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. Particular attention is being paid to the company's most productive factories. The quantification of waste and its destination are being closely monitored.



List of assessed indicators and results for secure transaction production plants:

QUANTITY OF WASTE	2021	2022	2023
<b>Hazardous</b> Tons	158	228	183
<b>Non-hazardous</b> Tons	2985	3413	3140
<b>Percentage of industrial waste recycling</b>	78%	84%	79%

Following on from what was announced in the previous edition of the Vigilance Plan, IDEMIA undertook the process of ISO14001 certification at Group level, which resulted in the certification being awarded in 2023. This certification ensures compliance with these various environmental aspects, notably within the production and customization sites.

The Group certification includes the following sites:

ISO 14001:2015 CERTIFIED SITES	CERTIFICATION EXPIRY DATE
<b>Johannesburg, South Africa</b>	26.07.2026
<b>Cotia, Brazil</b>	26.07.2026
<b>Santiago, Chile</b>	26.07.2026
<b>Shenzhen, China</b>	26.07.2026
<b>Bogota, Colombia</b>	26.07.2026
<b>Yumbo, Colombia</b>	26.07.2026
<b>Exton, United States</b>	26.07.2026
<b>Courbevoie (Registered Office), France</b>	26.07.2026
<b>Dijon, France</b>	26.07.2026
<b>Vitré, France</b>	26.07.2026
<b>Noida (Production plant), India</b>	26.07.2026
<b>Noida (Smart Chip Biometric), India</b>	26.07.2026
<b>Milan, Italy</b>	26.07.2026
<b>Haarlem, Netherlands</b>	26.07.2026
<b>Ostrava, Czech Republic</b>	26.07.2026
<b>Tewkesbury, United Kingdom</b>	26.07.2026
<b>Strangnäs, Sweden</b>	26.07.2026

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.

### 6.1.3.2. 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 CO<sub>2</sub> equivalent emissions linked to card production.

Moreover, the “GREENCONNECT by IDEMIA” offer has been enhanced with an option called “APOCa” (for “ABS Plug On Cardboard card”), which serves to 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 support entirely made of 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.

Lastly, 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.

IDEMIA's other business sectors have also taken steps to measure the emissions of their products. LCAs were therefore launched on a product dedicated to access control by facial recognition as well as an identity document. The results are expected at the beginning of 2024, and will pave the way for emission reduction measures right from the product design stage.

#### 6.1.4. 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.

##### 6.1.4.1. 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 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.

##### 6.1.4.2. 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 efficiency 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.

## 6.2. 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. As such, IDEMIA notably complies with the principles enshrined 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.

### 6.2.1. 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.

#### 6.2.1.1. 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 has compiled 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. This Checklist has been distributed to the Data Privacy community. Training courses have also been organised to teach the relevant teams how to complete it. To date, these training sessions have been provided for human resources managers, sales staff in the Secure Enterprise Transactions ("SET") Business Unit and R&D teams in India.

2. Even though IDEMIA only rarely acts as a data controller, it systematically undertakes that its 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.

**6.2.1.2. 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>› Pseudonymisation: 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 Principle</b></p> <p>Privacy protection must be one of the company's cardinal principles.</p> <p>Any project involving an information technology system supporting data processing must include privacy protection in its specifications.</p>	<p><b>N°2 Default privacy settings</b></p> <p>Provide the highest possible levels of privacy to the user given the state of the art.</p>	<p><b>N°3 Integration of the privacy respect principle from the design stage</b></p> <p>This is not an additional layer or module; this principle must be integrated as a non-functional specification from the concept development and design phases themselves.</p>	<p><b>N°4 Privacy protection as a feature</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 involves ensuring the confidentiality, integrity, availability, and resilience of systems, as well as the ability for intervention, control, and individual consent.</p> <p>Include the most appropriate measures for information protection.</p>	<p><b>N°6 Visibility and transparency</b></p> <p>In compliance with Article 39 of the GDPR, inform the end user about how their data will be processed to instill confidence.</p>	<p><b>N°7 User-centric privacy protection</b></p> <p>The individual concerned must play an active role in managing their data and controlling what others do with it.</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 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.

**6.2.1.3. Follow-up mechanism**

In 2023, 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	02/11/2026	
France	Osny	03/05/2026	
France	Vitré	02/07/2026	
India	Noida (registered office)	31/10/2025	
India	Noida (Smartchip Biometric)	31/10/2025	
India	Noida (Syscom Factory Main Unit)	22/05/2023	
Italy	Milan	24/03/2026	
Netherlands	Haarlem	23/01/2025	
Netherlands	Haarlem (ID&S)	18/12/2023	
Norway	Stavanger	30/12/2025	20/12/2023
United Arab Emirates	Dubai	10/08/2024	

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

**6.2.2.1. 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:

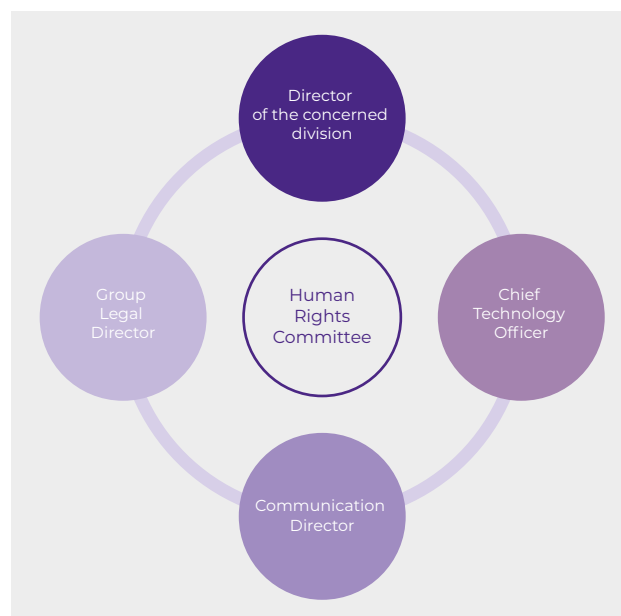
- › It provides for verification that third parties with which IDEMIA has dealings are neither on an international sanctions list, nor held by persons on a sanctions list. Some of these sanctions lists target individuals for human rights violations (e.g. the so-called "Magnitsky" lists).
- › IDEMIA has 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 marred by irregularities).

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.



**Composition of the Human Rights Committee**

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

- › For all divisions: any commercial opportunity involving a country heavily sanctioned by the United States and/or the European Union (the list notably includes countries covered by a European Union sanctions programme that included an export ban on materials that could be used for internal repression).
- › For all divisions: any project for which an export licence may be required pursuant to article 5 of European regulation n°821/2021.
- › 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, geopolitical 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
- › Level 3: Level 2 + more extensive analysis of public registers
- › 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.

#### 6.2.2.2. Risk mitigation measures

IDEMIA has implemented four types of risk mitigation measures:

##### 1. 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](#)<sup>1</sup>, to which IDEMIA contributed via the Secure Identity Alliance, and USAID's [Identity in a Digital Age: Infrastructure for Inclusive Development](#)<sup>2</sup>. IDEMIA takes these recommendations into account and advocates for their implementation to its customers with regard to the projects in which IDEMIA is involved.

<sup>1</sup> Principles on Identification for Sustainable Development: Toward the Digital Age (French). Washington, D.C.: World Bank Group, 2021. <http://documents.worldbank.org/curated/en/470971616532207747/Principles-on-Identification-for-Sustainable-Development-Toward-the-Digital-Age>.

<sup>2</sup> 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 recognition,

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.

In addition, IDEMIA will publish its recommendations for organisations responsible for deploying identity systems on its corporate website in Q1 2024. These recommendations will also be included in the brochures and sales presentations of the products in question.



**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) IDEMIA now structures its offers in such a way as to be able to implement controls and blockages in its systems if these are required by the Human Rights Committee and validated by IDEMIA's Chief Executive Officer or by the IDEMIA Group Supervisory Board.
- d) 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.
- e) 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.
- f) 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 the following in its contracts:
  - i. An export control clause:
    - › 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.

- ii. A clause highlighting IDEMIA's human rights commitments and requesting similar commitments from its customer.

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.

**6.2.2.3. Follow-up mechanism**



For the third 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	2023	
Number of training courses	Face-to-face/ Remote	Face-to-face/ Remote	Face-to-face/ Remote	Face-to-face/ Remote	E-learning
	26	38	31	31	N/A
<b>Total workforce</b>	<b>164</b>	<b>294</b>	<b>398</b>	<b>340</b>	<b>3 032</b>

In H2 2023, IDEMIA provided e-learning on the subject of export controls, which also included a presentation of the Group's human rights governance. The target groups are: management, the legal department, purchasing, sales, project and programme departments and R&D.

- › 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	2023
Approved projects	3	11
Conditionally approved projects	3	9
Rejected projects	1	9
<b>TOTAL</b>	<b>7</b>	<b>29</b>

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

Number of analyses performed	2022	2023
Level 3	94	64
Level 4	15	63
<b>TOTAL LEVELS 2 +3 +4</b>	<b>201</b>	<b>240</b>

### 6.3. Risks relating to suppliers and subcontractors

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 code of conduct 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 code of conduct 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.

As these various supplier risks are managed at the same level, they are grouped together under an overall risk heading, "Risks relating to suppliers and subcontractors".

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, on its Tier 1 suppliers. The supplier code of conduct requires these requirements to be applied throughout the supply chain.

### 6.3.1.1. Assessment and monitoring procedures

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

- › Periodic supplier audits: 54 audits were carried out in 16 countries in 2023,
- › 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 2023, more than 30 performance reviews were carried out, incorporating the results of EcoVadis assessments, as well as the trajectory and commitments to reduce greenhouse gas emissions.

- › 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.

### 6.3.1.2. 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.

### 6.3.1.3. 2024 outlook

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

More specifically for 2024, 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.

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

IDEMIA's activities as a company entail risks for employees, whatever their function within the Group. IDEMIA must implement measures to closely monitor the health and safety of its employees. Here are the risks highlighted by the risk map: prioritized according to their placement within the risk matrix.

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.

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

#### 6.4.1.1. 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. 11 IDEMIA sites are already ISO 45001:2018 certified.

ISO 45001:2018 CERTIFIED SITES	CERTIFICATION EXPIRY DATE
Santiago, Chile	19.11.2026
Shenzhen, China	25.05.2026
Bogota, Colombia	24.06.2024
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
Haarlem, Netherlands	21.12.2026
Ostrava, Czech Republic	14.11.2025

### 6.4.1.2. 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 implementation 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.

## 6.4.2. Protection of employees: risk of breach of the personal data of employees

### 6.4.2.1. 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 degree of maturity of the 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).

### 6.4.2.2. 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.

The personal data of IDEMIA employees are protected throughout their careers with IDEMIA, and even upstream. In particular:

- › No personal data provided by candidates during the recruitment phase is retained, except those indicated in their CV when candidates accept that IDEMIA retains them to possibly direct these candidates to other offers. In this case, the candidate's CV is retained for one year.
- › When employees leave the company, a procedure has been put in place to govern the return of their computer equipment and, where applicable, their telephone, under the terms of which they are asked to delete all of their personal and confidential data beforehand.
- › 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.

### 6.4.3. 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.

#### 6.4.3.1. 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,
- › Commitment.

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:
  - 89% (+2 points vs. 2022) of managers recognised for their level of support, exchange and recognition by their teams,
  - 84% (+3 points vs. 2022) of employees feel committed,
  - 89% (+1 point vs. 2022) of employees consider that they have the means to make the necessary decisions with regard to performing their job.

- 84% (+2 points compared to 2022) of employees believe that everyone is treated with respect in the company, regardless of their position.

- › 100% of employees have access to the Integrity Line alert platform.
- › 100% of employees have access to the Employee Assistance Programme (EAP).

#### 6.4.3.2. 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.

#### 6.4.3.3. 2024 outlook

Following on from these measures in 2024, the teams will be rolling out activities in the form of challenges to give IDEMIA employees the opportunity to try their hand at activities that will help them to prevent psychosocial risks (for example: “Move your body challenge”).

In addition, in order to strengthen the employee assistance programme, testimonials in the form of articles published on the company's intranet will be disseminated with the aim of reducing some existing barriers to the use of the platform. The aim is to show employees that the programme is accessible for a wide range of reasons and that

it is perfectly understandable to make use of the assistance offered by the programme.

Finally, in order to detect and prevent problems of this type, the Group's managers will attend introductory sessions in 2024 on how to identify and anticipate possible situations of employee malaise.

#### 6.4.4. Risk of employee discrimination

The risk of discrimination is mainly likely to affect employees in three aspects of the employment relationship:

- › During the recruitment process, by rejecting applications;
- › During the career, by reducing opportunities for internal mobility or career development
- › In terms of pay, by leading to abusive salary gaps.

##### 6.4.4.1. 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).

##### 6.4.4.2. 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:

- › 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.

The previous vigilance plan indicated that IDEMIA planned to extend these ERG initiatives to the entire Group. This project has been put on hold for the time being in view of the Group's reorganisation process.

# Unlock the world

---



All rights reserved. Specifications and information subject to change without notice.  
The products described in this document are subject to continuous development and improvement.  
All trademarks and service marks referred to herein, whether registered or not in specific countries, are the property of their respective owners.

