

# IDEX Biometrics

2025 Transparency Act Report

## 2025 TRANSPARENCY ACT REPORT

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This report has been prepared in accordance with the Norwegian Transparency Act (the “Transparency Act”) section 5 and summarizes the policies and procedures in IDEX Biometrics ASA with respect to safeguarding of human rights and decent working conditions and provides information on the implementation and results of the IDEX due diligence.

### ABOUT IDEX BIOMETRICS

IDEX was founded in Norway in 1996 and currently operates in Norway and the United Kingdom, serving global customers. IDEX is a leading provider of smart cards with biometric authentication for access and payment solutions. IDEX’ smart cards allow organisations to secure physical and digital assets, by verifying real human touch from the office entry up to and including digital login. For payments, IDEX can nearly eliminate card phishing and skimming attacks, reducing risk for financial institutions and safeguarding consumers.

IDEX’ smart cards can be self-enrolled and are provided on a per-card basis and a service. Today, through the Total Access Card, IDEX serves government institutions and enterprise organisations, while supporting a wide range of door readers, including leading standards for high-security access control. Through our IDEX Total Access Card, we provide vault-level offline keys to secure premises across the globe. Maintaining safety through verification of human identities.

IDEX is a leading player in fingerprint authentication. Our technology enhances and complements existing security infrastructure, as we support many pre-existing access systems. Typical users may use NXP, HID or Legic readers, and rely on IDEX to provide a secure solution without compromising on the user-experience. This enables security professionals and management to enjoy hassle-free implementation of superior security.

Organisations that prioritise Zero-Trust choose IDEX as the ideal solution, combining digital and physical access with your standard ID card. Today, leading companies and major government organisations depend on IDEX to put the human touch back into physical and digital security.

IDEX employed 26 people at the end of 2025 and has offices in Norway and the UK.

Beyond its commercial activities, IDEX is committed to conducting its business responsibly. IDEX respects and acknowledges the fundamental principles of human rights, labour rights, and healthy, safe, and lawful working conditions. IDEX endeavours to ensure that its business operations do not cause, contribute to, or are directly linked to, actual or potential adverse impacts on human rights and working conditions. The Company’s human rights and ethical policies and procedures are reviewed throughout the year, with modifications made when necessary to remain in compliance with its operating principles.

### GOVERNING DOCUMENTS

The IDEX Biometrics governing documents address the areas of human rights and decent working conditions and include the Company’s expected requirements and responsibilities. The human rights policies are embedded in the IDEX Code of Conduct and Ethical Guidelines, which sets out the Company’s ethical commitments and operating principles and is intended to encompass all processes of the Company and outline the way IDEX conducts business.

IDEX aspires to be a company of choice for current and new employees, supported by a culture of collaboration across departments and locations. The Company has established Fair Pay and Leave Policies available to all employees.

In the production supply chain, IDEX has a limited group of suppliers and established practice for assessing supplier capability that includes corporate and social responsibility.

## RESPONSIBILITIES

The board of directors is responsible for organising the Company and for supervising and controlling the CEO. This responsibility includes oversight of risks related to adverse impact on human rights and working conditions and ensuring that appropriate systems and processes are implemented. The board shall consider, discuss and resolve all significant policies related to human rights and working conditions. The board reviews risk at least annually, including risks related to actual or potential adverse impacts on human rights and working conditions.

The CEO is responsible for the day-to-day operations of the Company, including policy implementation and compliance. This includes assessing and managing risks of adverse impact on human rights and decent work related to the Company's operational activities, and implementing adequate systems, procedures and actions. The CEO reports to the board monthly.

The IDEX Biometrics executive team, led by the CEO, is under the supervision of the board including financial matters, ESG controls, auditing, and securities law matters. Management takes all reasonable actions to monitor compliance, and when appropriate, takes disciplinary action against any staff member involved in non-compliant matters. There were no such incidents in 2025 or 2024.

The CEO has delegated day-to-day responsibility for administering and interpreting the Code to a Compliance Officer. The Company's CFO has been appointed as Compliance Officer under the Code of Conduct and Ethical Guidelines.

The supply chain team is responsible for the assessment and monitoring of suppliers' corporate and social responsibility policies through the supplier audit.

The Employee Code of Conduct is shared with all employees as part of their onboarding and is available to all employees on the Company's intranet. IDEX Biometrics has a system for reporting irregularities in place that ensures any employee who wants to report an activity they consider to be illegal or dishonest can do so safely and, if so desired, anonymously. The Company has confirmed that whistleblowers will not face retaliation.

As part of its responsibility for employee welfare, IDEX maintains benefits that support the health and wellbeing of its workforce. The Company provides health and other benefits to employees consistent with statutory requirements and common practices in the countries in which it operates. Benefits are offered to individual contractors compliant with statutory regulations.

## DUE DILIGENCE WITH RESPECT TO HUMAN RIGHTS AND HEALTHY, SAFE AND LAWFUL WORKING CONDITIONS

IDEX respects the human rights and labour rights of its employees and the other stakeholders of the Company. The Company's business practices are fair and non-discriminating, and IDEX does not engage in business with suppliers or customers that are known to violate human rights or labour rights or to be involved in child labour.

IDEX makes every reasonable effort to secure a healthy, safe, and lawful work environment and to comply with all applicable laws, rules and regulations concerning occupational health, safety, and environmental protection. The Company promotes equality, non-discrimination, non-harassment, fairness, and ethical behaviour, maintains fair and balanced employment practices and equal employment opportunity policies, and offers a pleasant, well-equipped, and safe workplace. IDEX encourages and expects similar commitment from its suppliers, partners, and customers.

Prior to engagement with third parties, the Company evaluates the business approach and ethical conduct of third-party employee benefit and payroll providers, HR service and advisory companies, and HR software and solutions providers. This includes an assessment of protocols regarding the holding and processing of personal data in line with applicable regulations.

The IDEX supply chain team works to secure on-time product delivery, manage the Company's manufacturing partners, and perform regular supply chain due diligence, including follow-up on results so that any issues or unsatisfactory results (for example, labour and environmental questions) are resolved.

As of 31 December 2025, the Company had commercial production and manufacturing relationships with a limited group of direct suppliers, many of which are large global corporations with established policies addressing fundamental human rights and decent working conditions. IDEX assesses manufacturers through a self-assessment questionnaire (SAQ) upon first engagement and on a periodic basis thereafter. The SAQ collects information on the suppliers' work sites, including activities, working conditions, and workers at those sites. It is not extended to suppliers used for development only or for services or other sundry supply to the business.

### **RISK INCIDENT MONITORING**

IDEX maintains incident books at each office location with laboratory or production activities, which employees use to report any work-related injuries. No employees suffered a work-related injury in 2025 or 2024 resulting in absence from work, and no accidents or incidents involving the assets of IDEX occurred.

### **RISK ANALYSIS**

IDEX's approach to risk assessment considers potential risks related to the products and markets in which the Company operates. IDEX operates on a global basis, and the risk of adverse impact on human rights and on healthy, safe, and lawful working conditions is highly country specific. IDEX recognises that risks may also arise further down in the supply chain, and these are considered as part of the Company's overall risk assessment.

The risk of breaches of human rights and decent working conditions is considered low in the Company's own facilities and low to moderate across its value chain and partners. The Company's key suppliers are primarily global Tier 1 manufacturers with their own internal policies, audited by IDEX every two years as described above.

IDEX also works with business partners including card manufacturers, secure element providers, and other value-chain partners. As part of its 2025 due diligence process, IDEX identified five Priority 1 suppliers requiring enhanced assessment, covering smartcard component manufacturing, electronics manufacturing, secure element supply, certification services, and HR and employer-of-record services. These suppliers were prioritised based on a combined assessment of country risk, sector risk, and transaction volume. Three suppliers

were assessed as high risk and two as moderate risk. Suppliers assessed as high risk are active in sectors or geographies associated with elevated exposure to adverse working conditions, including manufacturing operations in Asia. Some suppliers have facilities or operations in countries associated with a higher inherent risk of adverse impacts, owing to the nature of such operations and their location; such risks include international trade policy, tariffs, and related geopolitical matters. For administrative business partners, the Company mainly interacts with banks and law firms considered to be lower risk.

This inherent risk is mitigated by maintaining policies and procedures for assessing and mitigating adverse impact, supply chain monitoring, due diligence, and reporting. Under the supplier due diligence process, any critical item identified is to be closed within a determined time period following each evaluation.

### MITIGATION OF RISK

In 2025, IDEX carried out human rights due diligence as part of its normal processes. Five Priority 1 suppliers were subject to enhanced due diligence based on their risk profile. The due diligence was conducted as a document-based analysis, based on publicly available information as well as supplementary documentation obtained from or about each supplier.

No actual adverse impacts were identified; however, inherent risks remain in certain parts of the supply chain, particularly related to geography and industry. Where elevated inherent risk was identified, this was attributable to country- and sector-level factors rather than specific conduct by the suppliers concerned.

### ACTIVITIES IN 2025 AND PLANS FOR 2026

The Company's governance policies, employee handbook, and country-specific policies are available to all employees in the IDEX employee portal.

During 2025, IDEX conducted a structured supplier due diligence process covering its Priority 1 suppliers in accordance with the Norwegian Transparency Act. The process included a risk-based prioritisation of suppliers by country risk, sector risk, and transaction volume, as well as collection of additional documentation for suppliers assessed as high or moderate risk. All five Priority 1 suppliers have been established suppliers to IDEX over several years, and no new material supplier relationships were entered into during 2025. The due diligence did not identify any actual violations of human rights or decent working conditions. A follow-up review of all Priority 1 suppliers is planned for 2026.

The dissolution of the Company's US and China subsidiaries, which was underway as of the prior reporting period, has been completed. IDEX now operates exclusively through its offices in Norway and the United Kingdom.

The status of the matters covered by this report was deemed fully acceptable as of the end of 2025. During 2025 there have not been any major changes in the supplier or customer relationships, and the Company's operations continued in an orderly manner. While no specific incidents have been identified, the Company will continue to further strengthen its due diligence processes and supplier monitoring in line with evolving best practice and regulatory expectations. The board therefore considers these aspects to remain fully compliant. While there will always be a desire to improve working conditions and safeguard business processes, the board is not aware of any indications that any new initiatives are needed at this time.

Oslo, 29 June 2026  
The board of directors of IDEX Biometrics ASA

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**Anders Storbråten**

Chair

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**Annika Olsson**

Board member

Signé par :



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**Adriana Saitta**

Board member

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**Kjell-Arne Besseberg**

CEO