



IDnow Modern Slavery and Human Trafficking Statement

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 (the “**Act**”) on behalf of IDnow GmbH (the “**Company**”). The Company is doing business in the UK and is part of the wider IDnow group. It is also made on a voluntary basis on behalf of (i) IDnow UK Limited (which is registered in the UK under company number 12912012, but does not independently meet the turnover reporting criteria under the Act), and (ii) IDnow’s group companies who are not doing business in the UK but share the group-wide commitment to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organization and supply chains.

This statement sets out the steps the Company and the wider IDnow group are taking, and will continue to take, to prevent modern slavery and human trafficking in its business and supply chains.

This statement has been prepared pursuant to the reporting criteria of the Act and covers the period 1 January 2025 to 31 December 2025.

1. Organisation Structure, Business and Supply Chains

The Company was founded in Munich, Germany in 2014 and has three fully owned operative subsidiaries, IDnow UK Limited (England), IDnow SAS (France) and IDnow Romania S.R.L. (Romania), together with IDnow Trust Services AB (Sweden), a majority owned subsidiary. These companies comprise the IDnow group.

IDnow provides SaaS-based identity solutions to B2B customers operating in Europe across a range of industries, including banking and finance, gaming, travel and telecommunication. The solutions include video identity verification, automated AI-powered identity verification, automated document verification, electronic identification via chip IDs and qualified and advanced electronic signatures. These solutions enable our customers to verify the identity and documentation of their end customers. As at 31 December 2025, the Company had 209 employees, and 474 employees in the wider IDnow group.

All procurement and operational activities are managed at the group level. IDnow UK Limited is established for employment purposes for UK-based staff and does not enter into sales contracts with customers or maintain its own supply chain.

IDnow’s suppliers are predominantly hosting providers (which supply the data centre infrastructure that powers IDnow’s identity verification solutions), technical service providers (generally supplying software which is embedded into our products), trust service providers and



“Ident Centers” (i.e. call centres responsible for the execution of identifications and reviews by specialist agents for certain IDnow products). Ident Centers are both part of the IDnow group and are also external service providers, and are based in Europe, with the exception of one call centre based in Pune, India. We also have a small number of other typical suppliers, such as professional services advisors (law firms, auditors, accountancy advisors) and suppliers supporting our office operations, such as cleaning and office maintenance.

2. Policies and Governance

Our Company is committed to conducting its business with integrity and upholding the highest standards of ethics and compliance. Our Company adheres to all group-wide policies, including the IDnow Group Code of Conduct, which sets out our commitment to human rights, ethical employment, and the prevention of modern slavery and human trafficking. These policies apply to all employees and operations of the Company.

3. Risk Assessment and Due Diligence

Given the nature of the IDnow group’s activities, the risk of modern slavery and human trafficking is considered low, both within our business and our supply chain. Procurement and supplier relationships are managed at the group level, where robust due diligence and risk assessment processes are in place to identify and mitigate risks associated with modern slavery.

Notwithstanding this, the Company considers that a potential modern slavery risk could arise in the context of Ident Centers operated by third-party companies. To address this risk, all external Ident Centers are subject to strict due diligence procedures as part of our onboarding assessment and are also subject to ongoing assessment, including regular onsite inspections by senior members of the Company’s Operations Management Team. All third-party Ident Centers are required to sign the “IDnow Anti-Forced Labour Declaration” which is issued in alignment with the ILO Conventions on Forced Labour, the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. In the event that any Ident Center is in actual or suspected breach of this Declaration, IDnow is entitled to immediately suspend the Ident Center’s engagement pending investigation and terminate the commercial relationship with the Ident Center.

The Company is committed to compliance with new and forthcoming legislative developments at national level across the countries where we operate and at EU level, including with the EU Forced Labour Regulation (EU) 2024/3015 which is currently in force and expected to be fully applicable by 2027.

4. Training and Awareness

Our Company is committed to ensuring all employees are aware of the risks of modern slavery and the standards expected. The Company launched a training and awareness course in 2025 for



UK-based employees addressing identification and prevention of modern slavery. Employees are encouraged to report any concerns or potential violations in line with the group's whistleblowing procedures.

5. Actions and Effectiveness

No incidents of modern slavery or human trafficking have been identified within our Company, the group or our business partners. The effectiveness of our approach will be monitored through ongoing compliance reviews, implementation of training, and policy updates at group level.

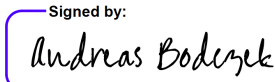
Following a review of the effectiveness of the actions we have taken to combat the risk of slavery and human trafficking in our business and supply chains, we will introduce a "Supplier Code of Conduct" in line with our commitment to continually improve and strengthen our approach year-on-year. We will also expand our current modern slavery training group-wide.

6. Approval and Publication

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 2025. It was approved by the managing directors of the Company on the date stated below.

Date: 4/23/2026

Signed:

Signed by:

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Name: Andreas Bodczek

Title: CEO (Director/Geschäftsführer)

Date: 4/24/2026

Signed:

Signiert von:

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Name: Andreas Maueroeder

Title: Chief Financial Officer
(Director/Geschäftsführer)