

## IDEX BIOMETRICS ASA

### **Policy in accordance with corporate governance review section 13: POLICY FOR IDEX' REPORTING OF FINANCIAL AND OTHER INFORMATION AND INVESTOR RELATIONS**

*Resolved by the board of directors of IDEX Biometrics ASA ("IDEX") on 3 December 2009, last updated on 21 December 2020.*

The primary purpose of IDEX' external information activities is to provide the financial markets sufficient information to accurately value the shares in the company. It is also the duty of the company to provide relevant information the other stakeholders in IDEX, such as customers, vendors, financial institutions, authorities and the public at large. It is in the interest and to the benefit of the company and all shareholders that there is interest in IDEX from analysts, investors, press or other parties to the financial market.

IDEX complies with the Oslo Børs Code of practice for IR information 1 July 2019, except that IDEX reports shareholdings as recorded in the VPS and for practical reasons does not trace beneficial ownership of shares.

The information shall be presented factually and soberly, and issued by use of methods and channels that ensures simultaneous, fair and wide distribution of the information

The information activities and duties applies independent of whether the company is in a positive or negative trend or state.

#### Outbound communication

Information that may be important to shareholders and other parties to the financial market is provided by publication of notices to Oslo Børs, the Company's web site, on social media, and through press releases. Interim report presentations are webcasted. The company's web site [www.idexbiometrics.com](http://www.idexbiometrics.com) presents the Company's business and financial matters.

All market/stock exchange announcements and press releases shall be approved by the Chairman on behalf of the board, and issued by the CEO or an officer appointed by the CEO. The CEO or an officer appointed by the CEO may issue social media publications that are in line with IDEX's notices to the market, and may also publish material relevant to the business such as references to news articles and other relevant publications.

The CEO shall appoint a contact person in addition to himself/herself, to serve the stock exchange, investors, analysts and the media. The CEO determines which person shall be the primary and the secondary contact. On request, the CFO may provide and explain financial information which has been issued. The CEO may delegate to the CFO or a service provider to perform the actual publication.

English is IDEX's corporate language. Local language may be used in oral communications and in other communication when appropriate.

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### Stock exchange announcements

IDEX provides information and disclosures to Oslo Børs and the Nasdaq Stock Market and the general public in accordance with the policies and regulations of the market places.

Commercial contracts - IDEX announces promptly all material commercial contracts, agreements and orders, which are strategically important or have a potentially significant financial value to the company. Such agreements include, but are not limited to Licensing Agreements, Sales Agreements, Supply Agreements, Manufacturing Agreements, and Joint Development Agreements. The threshold for significant financial value must be assessed for each relevant agreement, but as a guideline any contract with a revenue potential in excess of USD 1 million shall be considered significant. IDEX will also announce any other agreement, contract or order which may be considered noteworthy to the market.

Interim and annual reports and financial statements – IDEX publishes interim and annual reports and financial statements according to its financial calendar, which as a matter of good practice shall comply with the requirements of Oslo Børs.

Other – Other announcements, such as general meetings, share capital related matters and financial calendar, shall be issued promptly as soon as the information is available in final form.

IDEX does not publish budgets, forecasts or other forward-looking statements of specific nature unless there is a compelling reason to do so. IDEX will observe conventional practices regarding 'profit advice' or 'profit warning'.

Unusual market activity - Whenever unusual market activity takes place, the company will determine whether there is material information or news that should be disclosed. If rumors or unusual market activity indicate that information on impending developments has become known to members of the investing public or if information from a source other than the company becomes known to members of the investing public, an announcement may be required to equalize information and/or clarify the situation. IDEX should not comment on rumors or unsolicited statements made by third parties. However, in rare situations it may be appropriate to deny false or misleading rumors that are likely to have, or have had, an effect on the trading in its securities or would likely have an influence on investment decisions.

Advance notice to market places – IDEX will provide advance notice to the market surveillance department or equivalent of Oslo Børs and the Nasdaq Stock Market in situations where such notice is required by the regulations applicable to the market places, or when a trading halt is necessary or appropriate before and until a disclosure has been made.

### Press releases, interviews, other communications

IDEX may issue press releases and/or social media items about matters which are of general interest but not meeting the criteria for a stock exchange announcement.

Board members, the CEO and the CFO may give interviews in their respective capacities. The freedom of speech of other IDEX staff shall remain unrestricted, provided that the person does not pretend to represent IDEX and that the person observes his/her duty of

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confidentiality about inside information, IDEX technical and commercial sensitive information and anyone's personal matters.

IDEX does not comment on rumors or unsolicited statements made by third parties.

IDEX does not review, comment or otherwise validate analysts' reports as such. IDEX does provide factual information which has been issued in statements and reports earlier, and may explain and put such information into context.

If IDEX intentionally discloses material nonpublic information about the company or its securities to financial analysts, intermediaries or investors, the information will be also be published to the general public at the same time. If IDEX becomes aware that material nonpublic information about the company or its securities has accidentally been disclosed to financial analysts, intermediaries or investors without simultaneous disclosure to the general public, the company will promptly disclose such information to the general public.

### Top 20 shareholders

The list of top 20 shareholders is updated minimum monthly. Due to the practical obstacles and lack of timeliness, IDEX does not trace beneficial ownership.

### Inbound communication

Reference is made to the policy on contact with the shareholders between general meetings.

All enquiries regarding financial reports and investor communication, as well as enquiries from media and government authorities shall be handled by designated contact persons, see below.

### Contact persons

All information from IDEX shall be as considered and approved by the board, and announcements shall be approved by the board. Statements reiterating information approved and issued earlier may be issued as and when appropriate.

The information and investor relation activities are taken care of by the CEO. He/she may delegate specific tasks or subject to other members of IDEX' management when related to their respective area of responsibility. The CEO is available to analysts, investors and the press to explain and expand on the announcements. The management will facilitate direct contact to the chairman and other board members on request from shareholders or others.

### Inside information

The Norwegian Securities Trading Act regarding inside information applies to IDEX. Misuse of inside information is illegal. Inside information shall remain confidential and handled with due care and not disclosed by will or accident to any unauthorized party until it has been published according to this policy.

IDEX is also subject to the U.S. federal securities laws, which prohibit anyone from trading in IDEX's securities based upon material nonpublic information about the company or its securities, as well as from providing such information to any unauthorized persons.

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Reference is made to the insider manual and other insider rules issued by IDEX, which is included herein by reference.

IDEX seeks to avoid placing any party in inside information position, unless there is a business need for doing so and appropriate procedures are in effect. This also applies to contacts with shareholders. Shareholders and associates of impersonal shareholders who are elected board members will necessarily be fully informed primary insiders in that capacity.

### Quiet period

IDEX practices a minimum of two weeks quiet period before scheduled interim and annual report publication dates. In this period, no meetings or telephone conferences or similar with analysts, investors, press or other parties to the financial market are held.

Communication, if any, shall be limited to practical matters, and - on request - provision of statements and reports issued earlier.

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