

Mitek Systems Modern slavery statement 2024-09-05

Mitek Systems, Inc., on behalf of itself and its direct subsidiaries (including Hooyu Limited and Mitek Systems Private Limited in the UK) (collectively, “Mitek Systems”) is committed to social and environmental responsibility. As part of its commitment, Mitek Systems recognizes that human rights are a significant global issue and is committed to supporting human rights (which includes but are not limited to eliminating modern slavery, child labor, forced or compulsory labor and supporting other forms of human rights) in our organization as well as in our supply chain. We are committed to protecting and respecting human rights and have a zero-tolerance approach.

Mitek Systems is an identity verification service provider, specializing in identity verification, authentication, biometrics, image capture, and fraud detection. Our products ensure swift onboarding, instant identity verification, and robust defense against rising threats, such as cheque fraud and deepfakes. We allow companies and their users to identify people online by utilizing cloud-based identity platforms, mobile SDK’s and on-premises applications. Headquartered in San Diego, California, Mitek Systems also has offices across the world including New York, Amsterdam, London, Leeds, Barcelona and Paris. Mitek Systems operates largely in these jurisdictions but also conducts business in a wider number of countries around the world.

Mitek Systems is proud of the conditions of employment for all its employees throughout its offices worldwide, and is committed to adhering to wage, working time, minimum-age and modern slavery guidelines provided by applicable laws. This includes Mitek Systems’ employees as well as its contractors. The employment and procurement practices of Mitek Systems ensure that all our entities are, and are rightly viewed as, law-abiding and supportive employers. Mitek Systems provides a harmonious people environment and we have shown our commitment to our people as an Equal Opportunity Employer.

Mitek Systems’ supply chains are limited, but we ensure complete transparency within our supplier approval process. To the extent that we operate as a purchaser of goods or services, we expect a high level of ethical conduct from our partners as stated in our Standards of Business Conduct. We only use reputable employment agencies. We do use routine services for the maintenance and support of our office operations, such as cleaning and technical support services. We do not act as a producer, manufacturer or retailer of physical goods and have no supply chain in relation to such activities.

Due diligence and implementation processes for modern slavery and human trafficking

Mitek Systems engages primarily in industries that would not ordinarily be considered to be at risk for the perils of modern slavery and human trafficking. Notwithstanding, we take our obligations and responsibilities seriously and as part of our initiative to identify and mitigate risk (including in relation to that of modern slavery and human trafficking), we operate a range of appropriate policies and procedures. These include the following:

- **Pay and remuneration:** Mitek Systems is in compliance with all applicable minimum wage acts and does not supply workers to customers based on zero-hour contracts.
- **Mitek policies:** In our *Standards of Business Conduct*, we strive to demonstrate inclusive, respectful, honest, and ethical behavior in our interactions with each other, our customers, and our external stakeholders. Our *Whistleblowing Policy* offers

individuals a confidential mechanism for disclosing suspicions or knowledge of possible impropriety to protect Mitek Systems, its brand, people and clients by delivering an early warning when something goes wrong. This includes matters pertaining to our supply chain which would include modern slavery.

- **On-boarding policies:** When on-boarding employees, new contractors and other third-party suppliers, contractual assurances regarding ongoing compliance with our requirements and compliance with employment practices are routinely sought; and
- **Working conditions:** Mitek Systems ensures that the working conditions provided at its sites meet the relevant accepted standards, including with respect to health and safety of its personnel.

Other policies which contribute to and support our approach to the identification and prevention of modern slavery in our business include our *Diversity and Inclusion Policy* that encourages all our people to value diversity, respect each person's individuality, and to ensure that no partner, employee, agency worker, contractor, self-employed consultant, job applicant, ex-employee, client or third party receives less favorable treatment on the basis of color, race, nationality, ethnic or national origins, sexuality or gender, disability, age nor religion or belief.

Governance and oversight

Mitek Systems operates a Human Resources (HR) department led by its SVP Global People Operations, as well as a Legal department led by its Chief Legal Officer. All internal audit issues and risk assessment duties are met by the relevant departments (Legal, Compliance, Finance, People Operations) and, where appropriate, coordinated by the Compliance team. Each of these departments and executives have reporting responsibilities to management.

We use the services of BDO as an external auditor for both our financial audits as our ISO27001 and SOC2 efforts.

A combination of these procedures and functions operate to help identify, assess and monitor potential risk areas in our operations and mitigate the risk of modern slavery and human trafficking occurring in our supply chains. Mitek Systems also articulates a series of employee rights and benefits available to employees in its HR policies, posted internal resources, and in employment agreements for employees.

Legal and regulatory purpose of this statement

This statement is Mitek Systems' global statement on modern slavery and is made with regard to the obligations arising under Section 54(1) of the United Kingdom's Modern Slavery Act of 2015 on behalf of the reporting entities Hooyu Limited (UK company number 07180348) and Mitek Systems Private Limited (UK company number **12796356**) for the financial year ending September 30, 2025.

This statement has been approved by the board of directors of Mitek Systems. Jason Gray signs this statement as Chief Legal Officer on behalf of Mitek Systems Inc and its wholly owned subsidiaries, and in his capacity as a CLO of Mitek Systems.

Next steps

Mitek Systems continues to review and develop its policies, procedures, systems and controls to ensure ethical and legal compliance.

We intend to take the following additional steps in the next years:

- Disseminate this statement throughout the business.
- Ensure that all HR policies continue to be highlighted to all employees.
- Continue to monitor the government's guidance in relation to tackling modern slavery and update our processes as applicable.

Mitek Systems, Inc.



By: Jason L. Gray

Chief Legal & Compliance Officer