♦ SOGECLAİR

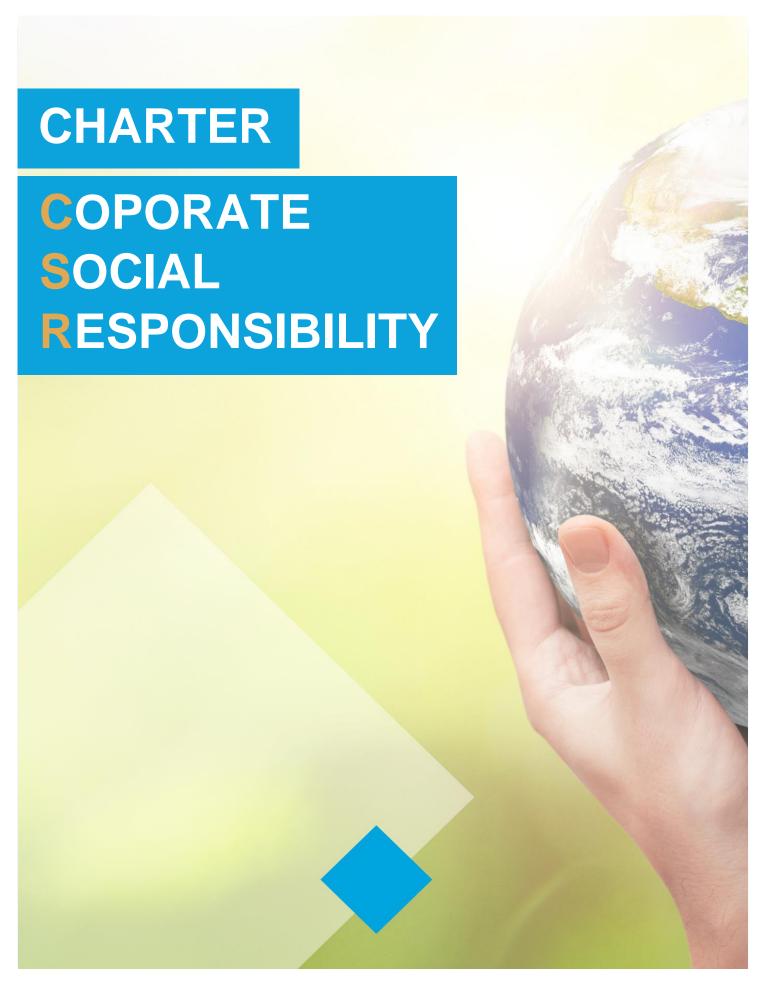




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PREAMBLE

As part of the ONE SOGECLAIR plan, the SOGECLAIR Group (also known as the "Group" or "SOGECLAIR") wished to adopt this CSR charter in order to bring together its commitments to sustainable and responsible development in the field of mobility.

SOGECLAIR, a global technology provider for safer and more sober mobility, wants to use its range of services to enable more virtuous development for its employees and customers.

The Group's identity is based on ethical and human values, as well as the pursuit of excellence and customer satisfaction. SOGECLAIR is recognized as a major player in its ecosystem, in particular for the way it takes environmental, social and societal expectations into account in its development policy.

SOGECLAIR wishes to work with its stakeholders to create the conditions necessary for ethical production, sustainable development, innovation and personal fulfillment, with a view to having a positive and virtuous impact on its entire ecosystem.

Our purpose: "To develop talent in an innovative environment in the service of sustainable mobility"



PREAMBLE

In consultation with its internal and external stakeholders, SOGECLAIR has defined the 8 Sustainable Development Objectives that guide its actions:

















This charter is based on the following pillars:

- > Respect and ensure respect for human rights
- > Protecting the planet by combating climate change
- > Adopting a responsible and equitable approach at all levels of the organization
- > Putting innovation at the service of sustainable performance
- > Making our talents players and beneficiaries of the transition
- > Raising awareness and training to make tomorrow's jobs accessible





































BE ETHICAL AND RESPONSIBLE

PILIER 3





SOGECLAIR undertakes to be exemplary in its operating methods and in the services and products it supplies, while respecting the laws and regulations of the countries in which it operates or to which it is subject. In so doing, it complies with the principles of business ethics and human and environmental rights.

To achieve this objective, SOGECLAIR has drawn up a Code of Conduct setting out the commitments that it applies, and which it hopes all its stakeholders will respect.

The Code of Conduct for employees and business partners is available on the company's website (https://sogeclair.com).

FAVOUR HUMAN DEVELOPMENT

HEALTH AND SECURITY

PILIER 3



Occupational health and safety is a priority for the company, and is the subject of constant attention to ensure a decent, respectable and safe working environment for everyone. SOGECLAIR also ensures that health and safety at work is a priority for ourservice providers, subcontractors and suppliers.

Health and safety procedures have been set up in our French subsidiaries. They are required to draw up and annually update a document relating to the safety of employees and external parties. This guarantee is provided by the Document Uniqued Evaluation des Risques Professionnels (DUERP), which identifies health and safetyrisks in the workplace. Organizational, technical and human preventive measures are put in place to minimize them: communication, training, awareness-raising, mandatory health check-ups, etc.

Abroad, subsidiaries rely on local organizations (such as "Mutua" in Spain) which are responsible for classifying employees according to their position, assessing risks and preparing awareness-raising materials.

In the field of prevention and protection, SOGECLAIR runs regular campaigns on theimportance of wearing Personal Protective Equipment (PPE), and ensures that safetyrules are applied. All new arrivals receive a welcome booklet containing information on how to behave and best practices. The company also runs first-aid trainingcampaigns to provide a first-aid response at its various sites. In partnership with theoccupational health department, awareness-raising days are also offered onworkstation ergonomics, the prevention of musculoskeletal disorders (MSD) and cardiovascular risks.

Concernerd about the health of its employees, the Group pays particular attention to the management of Psycho-Social Risks (PSR). RPS management is steered via the DUERP, which is regularly updated, in collaboration with the Health, Safety and Working Conditions Commissions (CSSCT) where they exist.

In this context, the main support is provided by staff representative bodies, occupational medicine and local management.

The Group strives to maintain a balance between the professional and personal lives of its employees, by distributing information notes outlining the procedures for respecting the right to disconnect, and by organizing specific interviews for employees on fixed working days.

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The same high standards are expected of employees of subcontracting companies and suppliers, in terms of compliance with the regulatory framework and laws in force.

EMPLOYEE DEVELOPMENT AND TALENT MANAGEMENT PILIER 3-5-6







SOGECLAIR aims to offer an attractive and motivating social model to attract and retain talent.

Every effort is made to ensure that our employees play an active role in the ecological, social and societal transition, by creating favorable working conditions and opportunities for personal fulfillment.

To encourage the development of new talent and make our employer brand more attractive, SOGECLAIR:

- > Rests on an induction period and career development;
- > Develops a training program specific to the position (business specialization or cross-functional skills such as project management);
- > Promotes mobility within the Group by providing information on open positions and supporting mobility;
- Offers employees the possibility of teleworking in accordance with current regulations;
- > Offers a monetary compensation through cooption.

SOGECLAIR regularly communicates on its successes through its internal newsletter and carries out "focus points" on subjects that need to be highlighted in order to showcase talent and their commitment to the Group through the projects they lead.

In addition, the Group relies on a network of stakeholders to co-create career paths and recruit talent with the help of employment and professional integration players in the various regions where it operates.

DIVERSITY AND EQUAL OPPORTUNITIES

PILIER 1



The Group has been a signatory of the Diversity Charter (www.charte-diversité.com) since 2019 and aims to be a trusted player in its application. SOGECLAIR is committed, on the basis of the Code of Conduct, to ensuring that the latter is respected by its employees as well as its stakeholders. It is essential that no form of discrimination undermines the rights and dignity of individuals. To this end, awareness-raising, prevention and mediation initiatives are carried out in the various companies.

SOGECLAIR is also committed to promoting the integration of disabled people in its recruitment policy and through the use of specialized service providers (e.g. in France: Etablissement et Service d'Aide par le Travail - ESAT).

IMPROVING ENVIRONMENTAL PERFORMANCE

The Group is committed to minimizing the environmental impact of its activities by developing and adapting its own internal practices, as well as those of its suppliers, through a Responsible Purchasing Charter. Extensive internal and external communication is carried out to ensure maximum transparency.

SOGECLAİR

REDUCING CARBON FOOTPRINT

PILIER 2 - 6







The first step is to calculate the carbon footprint of the Group's various entities, by means of carbon audits carried out on a staggered schedule, with the aim of covering the entire Group by 2026.

Following this, a diagnosis and avenues for reducing the main carbon expenses are explored, in order to comply at least with regulatory targets. At the same time, various actions are being taken at all Group sites to reduce their environmental impact (replacement of energy-hungry lighting systems, selective sorting, replacement of the company vehicle fleet with hybrid or electric models, green IT, building insulation, etc.).

SOGECLAIR also encourages its suppliers, service providers and subcontractors to carry out their own carbon footprint, and supports them in taking action across the entire value chain. An assessment of their CSR maturity is carried out when selecting suppliers (see Responsible Purchasing).

RESPONSIBLE PURCHASING

PILIER 1 – 2-3 – 6









Because of the nature of its activities, the Group is obliged to respect and ensure respect for the various regulations in force, in order to maintain a responsible production chain in line with expectations, and thus maintain its sustainable performance. When subcontractors are selected, they are asked to complete a questionnaire assessing their CSR policy, so that we can select the most proactive and, if necessary, involve the least mature in a continuous improvement process in this area, with the aim of encouraging them towards a virtuous cycle rather than penalizing them. The Responsible Purchasing Charter formalizes these commitments.

ECO-CONCEPTION

PILIER 2 – 3 – 4







A source of innovation and value creation, eco-design enables better consideration of environmental performance right from the product design stage. Drawing on its expertise in new technologies, the Group proposes eco-design methods to establish itself as a leader in the field, offering more sustainable solutions while standing out in its ecosystem.

SOCIETAL RESPONSIBILITY

RESPONSIBLE PRODUCTS AND SERVICES

PILIER 1 – 2 -3











In keeping with its commitments to its stakeholders, SOGECLAIR designs products and services that increasingly meet the challenges of sustainable development.

The products and services offered by the Group are defined to meet the highest expectations in terms of customer satisfaction, while guaranteeing an ethical and responsible approach throughout the life cycle.

HUMAN RIGHTS

PILIER 1 - 3





SOGECLAIR undertakes to respect the stipulations of the 8 fundamental conventions of the International Labour Organization (www.ilo.org), even if these are not included in the laws and regulations of the country where the workforce is employed. The Group also undertakes not to use any form of forced labor or child labor in its own operations or in its supply chain. It also

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refrains from any form of discrimination or harassment. It implements all necessary actions, including those promoting gender diversity and equality. These requirements are communicated to all our stakeholders.

RESPONSIBLE SUPPLY CHAIN

PILIER 2







As part of its commitments, SOGECLAIR intends to comply with European REACH regulations(https://commission.europa.eu/business-economy-euro/productsafety-and-requirements/chemicals.fr) for European countries, as well as other regulations in force in each country, and to refrain from using minerals from conflict zones in its products.

AN EFFICIENT PARTNERSHIP

PILIER 3 – 5





SOGECLAIR is keen to develop a trusting, effective and beneficial partnership with all its stakeholders. This is why the expectations of our customers and all our stakeholders are included in the development of new products and services.

ACT FOR LOCAL TERRITORIES

CONTRIBUTION TO LOCAL DEVELOPMENT

PILIER 3 - 5 - 6





As part of its CSR approach, the Group is committed to interacting with its various ecosystems. In fact, the Group is committed to working with stakeholders in the areas in which it operates, in order to contribute to the economic, social and cultural development of the areas in which it operates. This is achieved through partnerships (with universities, for example), exchanges (with economic bodies, associations, etc.) and contractual agreements, as well as through the use of local hands and resources, while respecting local needs and specificities.



NOTES		



RECORD OF REVISION

DATE	OBJECT
30 NOV 2023	Initial release
06 MAR 2024	Visual modification of the document to maintain the integrity and consistency of the SOGECLAIR brand image after the rebranding of SOGECLAIR; no content modification.

APPROUVED BY:

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