

2024

Sustainability Report



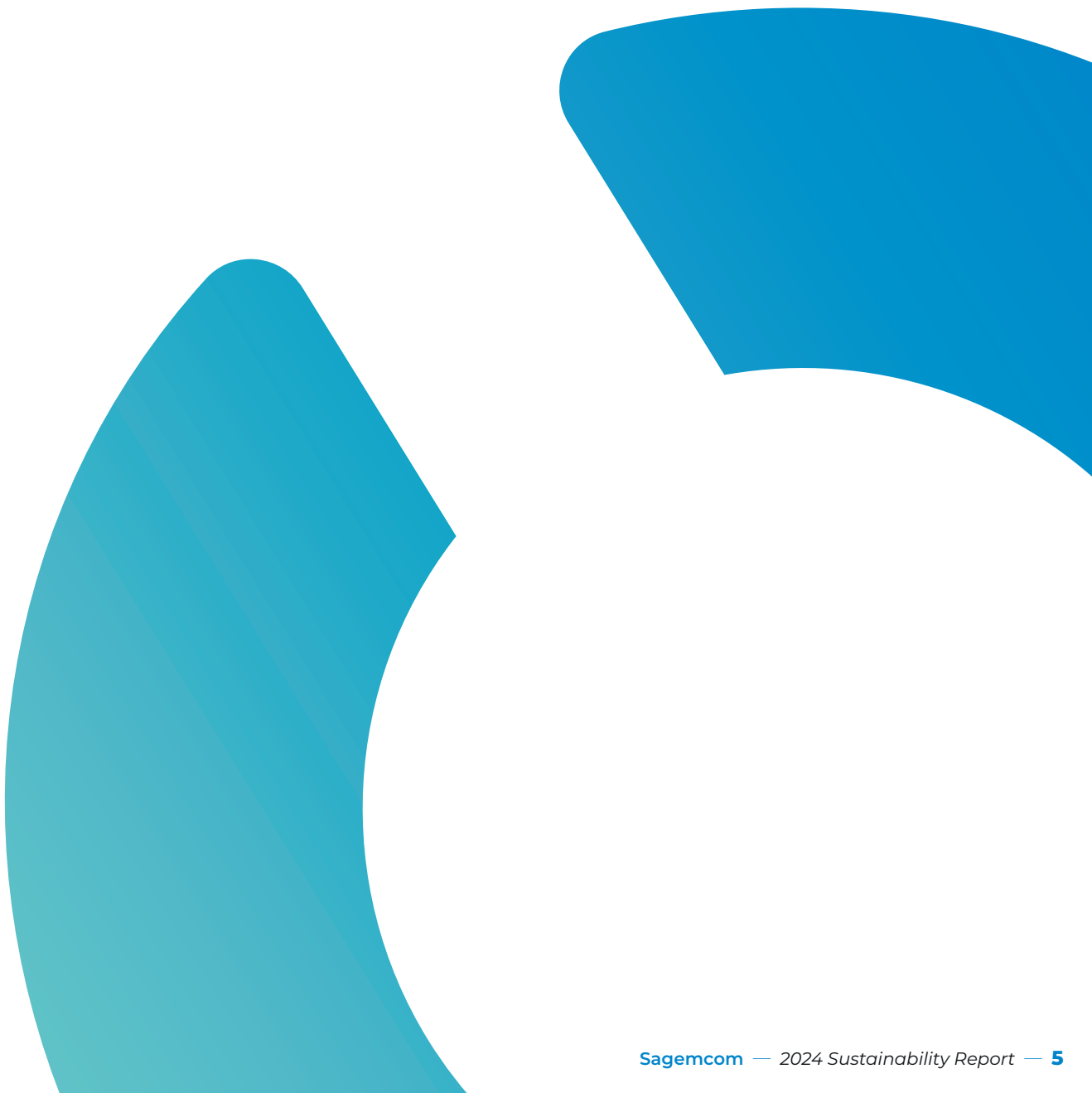
Sagemcom

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General information

1. Corporate Social Responsibility at Sagemcom

For many years, the Sagemcom Group has been actively committed to its corporate social responsibility initiative, a strategic lever for differentiation and transformation in its opinion, which is recognised both in its markets and within its ecosystem, as well as by all of its internal and external stakeholders. Many of the Group's initiatives demonstrate this commitment, which has become a corporate culture. The Group has been a member of the Global Compact since 2011 and obtained Gold certification from Ecovadis in 2016 and Platinum certification in 2021. It has also voluntarily published a CSR report since 2014 and has been backed by the SBTi since 2021.

In 2022, Sagemcom opted to move its corporate culture up a notch and go even further in its social responsibility commitments, with the Group becoming a “mission-driven company”. This is a voluntary and, above all, very proactive approach because it is based on the definition of a corporate purpose associated with targets that become statutory and that are regularly audited by a third party.

The specific nature of this status lies in:

- its 360° vision of corporate social responsibility issues
- the transformative dimension it gives to the commitments made as part of the mission, both for the company and for its ecosystem
- a governance structure specifically dedicated to the Group's mission
- regular audits conducted by a third party aimed at analysing the relevance and quality of this governance, the consistency of the mission, and the ambition of the statutory targets and associated trajectories, as well as the solidity of the associated indicators and their achievement.

2. Sagemcom, a mission-driven company

Since January 2022, Sagemcom has been a mission-driven company. This commitment was a continuation of all the actions that we have taken thus far and enabled us to give a whole new meaning to our Group, by becoming an engaging and unifying project.

This new status has gradually been structured around a corporate purpose, based on five pillars that now guide our strategy and our daily actions.

2.1 Sagemcom's corporate purpose

“Thanks to the innovative solutions designed and built by our people, we enable the greatest number of people all over the world to access high-speed Internet and entertainment, and to control their energy consumption. This is our purpose.”

2.2 Our 5 pillars and operational targets

- **Supporting action in favour of the environment to reduce the impact of our activities** by considering the specifics of local environmental and economic situations, with a view to globally combating climate change.

- **Enhancing innovation in our eco-design processes** in order to limit the impact of our products and services throughout their life cycles.
- **Managing our ethical and environmental requirements as part of our purchasing policy, according to a road map shared with the Group's suppliers** and validated by our audit and assessment strategy.
- **Promoting a working environment that helps to protect the health and safety of our employees, and improves their quality of life at work.**
- **Helping our employees to pursue their professional development** throughout their career in the Group by sharing our values and promoting diversity.

This mission-driven company status must be seen and understood as the reflection of Sagemcom's corporate culture on CSR issues, as a backbone for its actions and as an ambitious and transformative roadmap for Sagemcom and its stakeholders. It will be regularly referred to in this report.

In addition to the commitments included in Sagemcom's mission, cross-company issues structure the Group's policy, including cybersecurity, which is a major challenge for Sagemcom, its customers, end customers and the entire Group ecosystem. As such, even though this issue is not currently included in the CSRD's reporting obligations, it is considered by Sagemcom to be highly material and will be covered in a dedicated section in this report.

2.3 A commitment rooted in the United Nations Global Compact

Sagemcom signed up to the United Nations Global Compact Initiative in January 2011 and is committed to ethical standards, the promotion of human rights and respecting the rules of the International Labour Organisation including the 8 conventions, both within the Group and with its suppliers.

Principles of the United Nations Global Compact

Human Rights	Internationally support and respect human rights.
	Ensure no violation of human rights
Work	Confirm the freedom of association and the right to collective bargaining.
	Confirm the suppression of any form of compulsory or forced labour.
	Confirm the abolition of child labour.
	Confirm the elimination of discrimination for employment.
Environment	Support an environmental approach.
	Undertake initiatives to promote more environmental responsibility.
	Encourage the development and spread of environmentally friendly technologies.
Anti-corruption	Fight against corruption in all of its forms, including extortion.

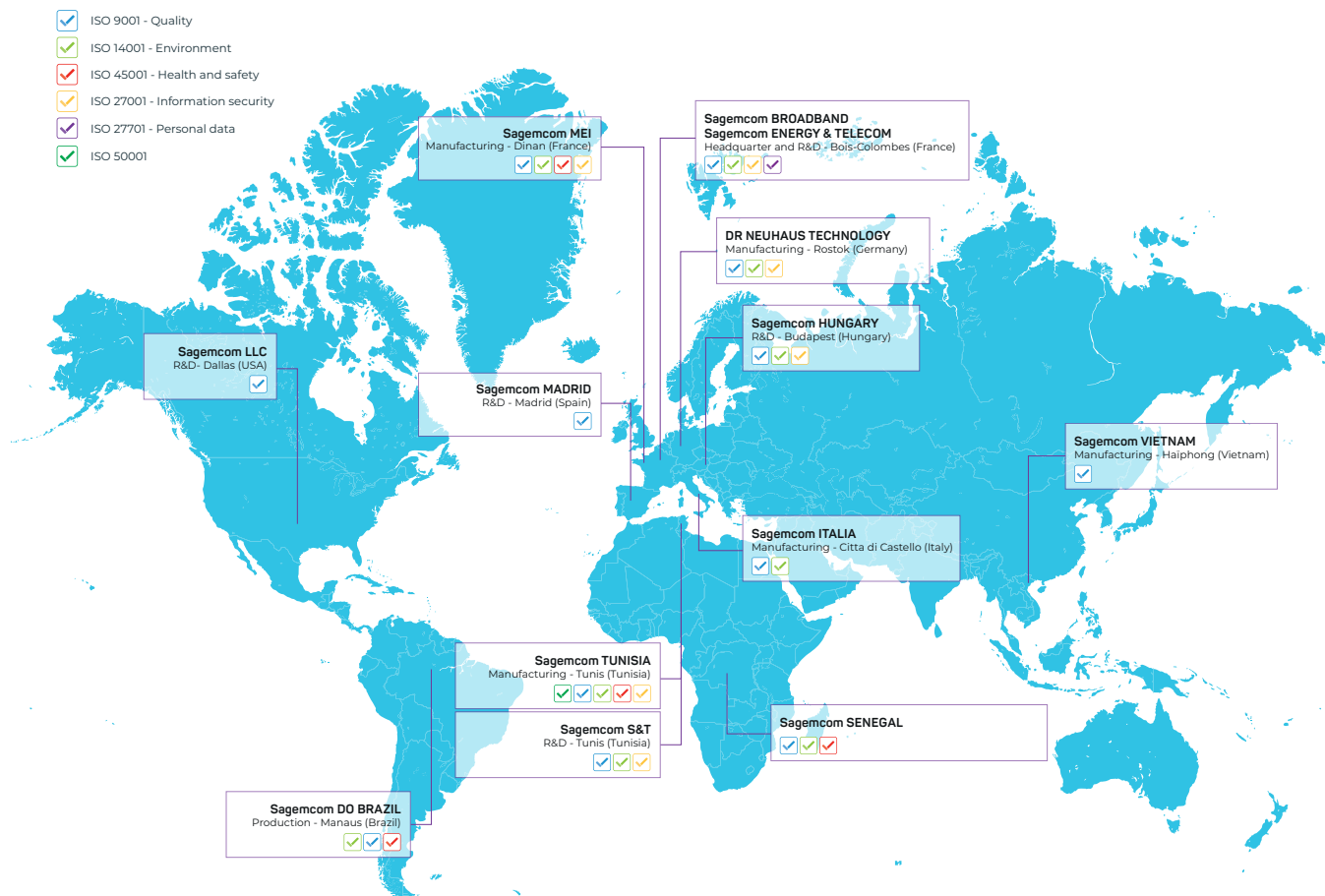
As a signatory of the Global Compact, the Sagemcom Group is committed to respecting and encouraging these principles, which can be found in the Group's policy entitled "Sagemcom Global Policy on Working Conditions, Respect for Human Rights and Environmental Protection", and which are transcribed into Sagemcom's statutory mission.









The Group also asks its suppliers, partners and subcontractors to adopt, support and apply these fundamental values in their respective spheres of activity, values which are reflected in an Ethical Charter that is mandatory for any business relationship with Sagemcom (see p. 110). These principles are approached through different work streams described in this document.

Finally, it should be noted that in 2024, the Sagemcom Group specifically created a CSR Department, attached to the CSR & Communication Department and integrated into the Group's Management Committee, whose objectives are to structure and implement Sagemcom's CSR strategy, meet the Group's decarbonisation trajectories, in particular by enhancing the eco-design of products, and manage Sagemcom's mission and the implementation of the CSRD.

3. Reporting standards, external recognition and third-party audits

The Group's main sites are ISO 9001- and ISO 14001-certified. The industrial sites are also ISO 45001-certified and our largest sites in Tunisia, ISO 50001-certified. Finally, all sites concerned with information security are ISO 27001-certified.



Organisation and external initiative	Description	Sagemcom's commitment
United Nations Global Compact (UNGC) 	United Nations Initiative for the adoption of principles on Human Rights, Labour, Environment and Anti-Corruption.	Signatory since January 2011
Carbon Disclosure Project (CDP) 	Transparency platform for companies' climate actions and their supply chains.	B rating for climate in 2024; A rating for supplier commitment in 2024; suppliers assessed via CDP since 2022
Responsible Business Alliance (RBA) 	Network promoting responsible practices in global supply chains.	Member since November 2022
Sustainable IT Charter (INR) 	Commitment to ethical, sustainable digital technology that respects fundamental rights.	Signatory since February 2024
Global Reporting Initiative (GRI) 	International framework for non-financial reporting of companies	Sagemcom complies with the GRI obligations and presents a report in reference to them
Responsible Minerals Initiative (RMI) 	Reference tool for ensuring traceability and accountability in the supply of minerals.	Compliance with RMI principles and use of traceability models
EcoVadis 	CSR assessment platform for suppliers, covering ethics, labour and human rights, environment and sustainable procurement.	2025 Platinum certification (99 th percentile)
Science Based Targets initiative (SBTi) 	Initiative establishing carbon reduction targets in line with the Paris Agreement.	Trajectory approved by the SBTi: • 2030: 100% renewable energy at our sites; 47% reduction in our Scopes 1 and 2; 31% reduction in our Scope 3. • 2040: Net Zero compared to 2019

4. 2024 Group Policy



SUPPORT SAGEMCOM'S SUSTAINABLE DEVELOPMENT BY MAINTAINING OUR

- Build on our innovation skills to keep customers loyalty and conquer new ones
- Consolidate our customer portfolio while maintaining our profitability
- Continue to grow our international income outside Europe

SATISFY OUR CUSTOMERS' NEEDS

- Anticipate the needs and expectations of our customers
- Leverage our excellence by taking into account field returns, via "Quick Quality Loops", and performance indicators
- Continue to support our customers in controlling their carbon footprint

CONTROL PRODUCTS AND SERVICES

- Secure time to market and software quality through deployment of:
 - Agile methods and continuous automatic integration/validation
 - DevOps approach for end to end solution software
 - Project management, in particular through risk analysis
- Amplify the security by design of our products/solutions and anticipate the regulatory changes concerning cybersecurity
- Reinforce the quality control of our suppliers and components in an evolutive context
- Continue DFM (design for manufacturing) actions
- Anticipate regulatory developments and innovate in reducing the impact of our products

DEVELOP OUR TALENT CAPITAL

- Promote and guarantee the sharing and adoption of our employees to the group's values
- Attract, develop and retain Talents, in an international and multicultural environment
- Capitalize on knowledge and adapt team skills to our current and future needs, to contribute to the group's strategy and its development
- Guarantee the efficiency of our organizations, particularly in the hybrid mode working context



MAINTAINING OUR LEADERSHIP POSITION IN THE MARKET

- Value and develop value-added services offers
- Adapt our logistics, industrial, purchasing and quality strategies to changing global context, to respond to the various challenges

CUSTOMERS

- Secure the supply chain thanks to our industrial know-how and the expertise of our main suppliers
- Strengthen the implementation of our business continuity plan
- Strengthen compliance and prepare for new ESG (Environmental and Societal Governance) reporting requirements

SECURE INFORMATION

- Amplify the security of our infrastructures and data (particularly at our abroad subsidiaries), including the protection of personal data and privacy
- Improve our responsiveness/protection towards increasing cyber-attacks (explosion in the number of vulnerabilities and sophistication of attack methods)
- Supervise and secure our dependencies with our partners, particularly Cloud ones
- Maintain regular training among all the employees on cyber security risks (e-learning, phishing...)
- Ensure our regulatory compliance in a very evolving context (NIS2, Cyber Resilience Act, etc.)

CONTINUE THE DEPLOYMENT OF OUR MISSION-DRIVEN COMPANY COMMITMENTS

- Support action in favour of the environment in order to reduce the impact of our activities by taking into account the specifics of every environmental and economic situation, with a view to globally combating climate change
- Develop our eco-design processes in order to limit the impacts of our products and services throughout their life cycles
- Focus our ethics and environmental requirements, as part of our purchasing policy, according to a roadmap shared with Group suppliers and guaranteed by our audit and assessment strategy
- Promote a working environment that helps to protect the health and safety of our employees, and improves their quality of life at work
- Help our employees to pursue their professional development throughout their careers in the Group, especially by sharing our values and encouraging diversity

5. Impact, Risk and Opportunity Management (IRO)

Ever since it was founded, Sagemcom has been conducting risk analyses through various mechanisms, including ISO standards and internal processes. These analyses have led to organisational, technical and financial decision-making that has shown the Group's effectiveness in its ability to understand risks and build strategies to overcome them (strategic repositioning, Covid crisis, incidents at one of its sites (fire) or involving its value chain (component crisis, tsunami, etc.)).

The CSRD approach has led the Group to integrate a new methodology into its ESG (Environmental, Social and Governance) risk mapping. Each of the topics covered by the CSRD has been analysed by dedicated working groups, combining technical, business, sectoral or complementary skills. It should be noted that each person involved in the IRO analysis process maintains ongoing relationships with their stakeholders, on their own topics. Internally, employee expectations regarding these issues are taken into account through regular social dialogue structured around bodies such as the economic and social committee or the health, safety and working conditions committee.

The IRO analysis work was carried out throughout 2024 to lead to a double materiality analysis that will be presented in 2025 to the Sagemcom Group's decision-making bodies (Management Committee, Supervisory Board, Audit Committee). It should be noted that Sagemcom has no CSRD reporting obligation in 2025 regarding its 2024 data: it is therefore a voluntary exercise, which is not intended to be 100% compliant with the methodology required by the CSRD standard, but which aims to align with a standard adopted by a large part of the Group's ecosystem and which has effects considered virtuous by Sagemcom, particularly in terms of transparency of non-financial reporting. It should also be noted that all of the Group's activities within its various geographies have been taken into account in this analysis, apart from the exceptions specified in the text. The Sagemcom value chain analysis is currently focused on Tier 1 suppliers.

Climate change

1. Policies related to climate change mitigation and adaptation, including the transition plan

Sagemcom is actively involved in mitigating climate change, and is doing its part to limit global warming to +1.5 degrees above pre-industrial levels, by setting an ambitious roadmap for reducing its greenhouse gas emissions to achieve net zero, in absolute value and across all scopes, by 2040.

This trajectory is approved by the SBTi (Science Based Target initiative), which requires an intermediate target, about 10 years after the baseline year, to be identified to measure the reality and possibility of the set trajectory. Sagemcom has therefore set a target for 2030, approved by the SBTi, of a 31% reduction, in absolute value, on scope 3, of its greenhouse gas emissions compared to 2019. In addition, the Group has committed to a trajectory of 100% renewable energy on its sites by 2030, approved by the SBTi.

Sagemcom is also committed to a transition plan that aligns with the 1.5°C goal of the Paris Agreement, for Scopes 1, 2 and 3. This commitment includes:

- mitigating climate change through reduction measures such as eco-design through the products that Sagemcom designs, manufactures and delivers for its customers
- adapting to climate change through energy efficiency measures (intra-Sagemcom deployment of personal self-consumption solution)
- energy efficiency with localised action plans for each site in order to reduce energy consumption
- deploying renewable energy solutions, through the implementation or signing of PPAs or renewable energy certificates of origin.

2. Actions and resources related to climate change policies

Sagemcom has set up carbon accounting which is carried out annually and verified by a third party, in line with its mission-driven company status (three of the Sagemcom mission's statutory targets are related to reducing its carbon footprint), to non-financial reporting issues, and to support the Group's customers and partners in the transition to Net Zero. Sagemcom's GHG footprint is based on Sagemcom Broadband SAS, a subsidiary of Sagemcom Topco, in other words on the same reporting entity as the Group's financial consolidation. The greenhouse gas balance is drawn up in accordance with the recommendations of the Greenhouse Gas Protocol (GHG). The choice of asset modelling is based on the Sagemcom Group's internal depreciation accounting policy

(depreciation over one year), with no depreciation planned for the property portfolio.

2.1 A carbon footprint almost exclusively measured in physical flows

Sagemcom's choice of establishing a carbon footprint based on physical flows was implemented for the first time in 2024 for the 2023 carbon footprint. This choice is an exception in Sagemcom's ecosystem, and particularly demonstrates the high level of its commitment and the accuracy of its indicators, which are essential to building a realistic decarbonisation trajectory that can be controlled from year to year.

95.4% of Sagemcom Group's greenhouse gas (GHG) emissions come from physical flows, corresponding to primary or secondary physical data that are more accurate than cash flow analyses and include fewer uncertainties.

The share of greenhouse gas (GHG) emissions in cash flows therefore is 4.6% of the Group's total, broken down as follows:

- item 3.1 "Purchased Goods or Services". The accounts concerned include:
 - administrative supplies: corresponds to small supplies
 - general subcontracting: modelling based on an average of subcontracting expenses
 - insurance
 - fees
 - advertising and events
 - postal and telecommunications charges.
- the "technical" vehicles within the scope of the Energy & Telecom business unit, due to the excessive uncertainty in the primary activity data. The emission factor used is the "Land Transport Service" of the ADEME carbon base.

It should also be noted that the methodology used by Sagemcom to measure its carbon footprint is verified annually by a third party.

2.2 Scope of Sagemcom's carbon footprint

The carbon footprint published in this report covers all the activities of Sagemcom Broadband SAS and its subsidiaries in the 2024 financial year, and therefore includes all the consolidated legal entities in the Group's financial statements.

This organisational scope is aligned with the one used for financial reporting, unless otherwise stated, in order to ensure consistency and comparability between the financial and non-financial information verified by the same statutory auditor answering to the CNCC.

As at the reporting date, the scope includes 70 companies in 47 countries, covering all of the Group's activities. The scope covers Sagemcom product assembly activities, research and development centres, and operating entities.

All items following the Scope 3 Calculation Guidance - GHG Protocol methodology are taken into account. The coverage rate for Scopes 1, 2 and 3 is 100% of the Group's entities.

The categories of greenhouse gas (GHG) emissions where Sagemcom emits TCO₂e into the atmosphere are as follows:

- gross Scope 1 GHG emissions
- gross location-based Scope 2 GHG emissions
- gross market-based Scope 2 GHG emissions
- total gross indirect GHG emissions (Scope 3) (tCO₂eq).

The breakdown by company is carried out according to geographical coordinates, i.e. longitude and latitude. To protect our teams in certain sensitive geographical areas, the detailed table for this breakdown including geographical coordinates is not made public.

2.3 Scope 1 & 2 actions

Since 2024, Sagemcom has implemented detailed site-by-site reporting, covering 2024, of course, but also reprocessing 2023 and 2022 data.

This system makes it possible to trace all consumption records, month by month, as well as the associated OPEX.

Included in the environmental data tracked are:

- electricity
- steam and heating networks
- refrigerant leaks
- natural gas and biogas
- water
- fuel and diesel used in sprinkler systems.

Activity is measured in primary physical flows, and this data is tracked via a tool developed in-house, called "Environment Performance View". The purpose of this tool is to provide an annual consumption Score Card for each site and each Group entity, also enabling environmental performance management to be implemented for the sites, particularly in the context of the Group's ISO 14001 commitments. The same activity data also serve as a basis for the accounting of greenhouse gas (GHG) emissions.

Environmental activity data are therefore traced by the invoice, by the meter reading or estimated by standardised methods.

2.4 Consumption of electricity

As part of its ISO 14001 management, Sagemcom has opted not only to

take steps to reduce its energy consumption, but also to contribute to the development of renewable energy by signing contracts for electricity that is certified as coming from renewable sources for the entire consumption of its sites, wherever possible. This promise is materialised by the production of guarantees of origin. Electricity suppliers agree to inject renewably produced electricity into the grid and provide certificates confirming that the energy consumed has come from renewable sources.

However, green energy contracts are not available in all the countries where Sagemcom operates, and particularly in Tunisia, where the Group's main industrial sites are located. This is why Sagemcom installed its own solar power plant in the car park of its Ben Arous plant in 2023, which meets 15% of its annual energy needs, and it plans to increase this production capacity in the years to come. In 2024, the first full year for this plant, 1,493 MWh were produced, representing a gain of 810 TCO₂e (taking into account the depreciation related to this asset).

2.5 Specific Scope 3 action (eco-design, product consumption)

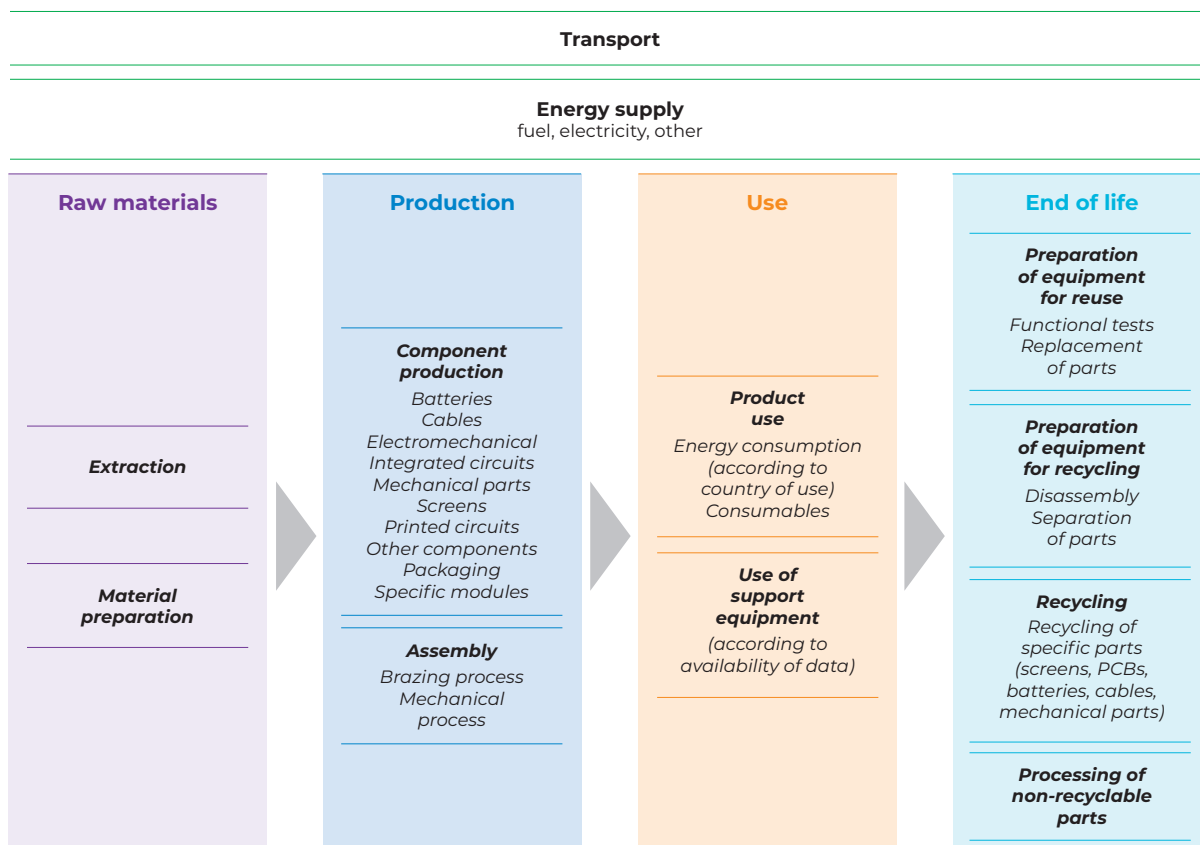
The summary of the Sagemcom Group's GHG emissions demonstrates the Group's commitment to reducing greenhouse gases.

Sagemcom's Scope 3, whose reduction is a Group mission indicator, accounts for 99% of Sagemcom's emissions. Of these 99%, 21% concern the manufacture of products, and 76% their use. It should be noted that Sagemcom's presence in many countries with a high-carbon energy mix has a direct impact on the Group's carbon footprint. With this in mind, a strategy has been put in place to identify the main sources of emissions related to the use of our products, and to implement concrete and targeted actions to reduce them.

In this regard, teams specialising in eco-design assist the research and development centres and product teams, and measure the implementation of eco-design actions using product life-cycle analyses (LCAs). These analyses are carried out using primary and secondary data, and provide physical data for the carbon footprint. All of these data are used to identify eco-design priorities with the aim of reducing the environmental impact of the Group's products and solutions.

2.6 Life-cycle analysis

To identify opportunities for improving the environment, Sagemcom analyses its legacy products in terms of both quality (means of assembly, etc.) and quantity, modelling the product lines using a simplified life-cycle analysis tool: EIME software, developed by CODDE Bureau Veritas. Internal life-cycle analyses are conducted in accordance with the ISO 14040 and ISO 14044 standards, respecting the following boundaries:



These analyses guide strategic development choices, particularly regarding the reduction of energy consumption. In fact, for the majority of Sagemcom's portfolio, it is the phase when the products are in use that has the greatest impact on their life cycles.

This expertise also makes it possible to conduct preliminary life-cycle analyses during the preliminary design phases of new products, carried out jointly with certain customers. The goal is to estimate the environmental impact of a product, in order to support customers in their choices between different scenarios, particularly regarding the logistical phase and the choice of materials. This work also makes it possible to anticipate the communication mechanisms between products and networks in order to cover cases where one of them would prevent the other one from switching to standby mode. All major projects are analysed in order to assess their impact and the associated gains, with every product family having a specific approach to reduce its environmental impact.

Sagemcom manages the quality of its carbon footprint through a rating scale for its LCAs. The higher the rating, the more reliable the LCA is, with the highest rating corresponding to a third-party review, and the lowest to an analogy with a similar product. On this scale of 1 to 10, Sagemcom has a rating of 7.7 out of 10, this rating being reviewed by a third party.

This exceptional approach has enabled Sagemcom to become the first

group in the world to obtain the TÜV Greenmark label, certified by the German TÜV organisation, as well as the Bureau Veritas Footprint Progress label.

It should be noted that in 2024, 7.8% of Sagemcom's products have an eco-label. For example, 15% of the sales of the Audio Video Solutions business unit are covered by an eco-label.

Use of sold products

Through its Life-Cycle Analyses (LCAs) on its product categories, Sagemcom has identified that more than 76% of the carbon footprint of its products comes from the phase when they are in use, mainly related to energy consumption. Therefore the majority of the company's CSR and technological innovation efforts are focused on this lever.

Reducing the energy consumption of products: a strategic priority

Sagemcom aims to significantly reduce the power consumption of equipment in operation and in standby mode, while guaranteeing performance, safety and reliability for all of its product ranges. This is a major challenge when the vast majority of products delivered by the Group remain switched on 24 hours a day in end users' homes.

To reduce their consumption, several innovations have been implemented:

- ultra-low standby: the latest generation of Sagemcom boxes integrate "deep sleep" modes to reduce consumption by more than 90% when the device is idle with a consumption of less than 0.5W
- programmable functions (Wi-Fi cut-off at night, automatic standby) accessible via interface or mobile app, to encourage more economical use
- smart scheduling: systems for automatically shutting down unused services (Wi-Fi at night, inactive Ethernet ports, etc.)
- ultra-low power electronic components, a choice of new-generation components that are more efficient and less energy-intensive.

On the smart electricity meter ranges, the priority is to minimise consumption, improve AC/DC power supply efficiency, reduce the number of components through the optimisation of the electronic schematic design, choose less energy-intensive components and finally lower the frequency of the main microcontroller for gas and water meters, and optimise battery life:

- ultra-efficient low-frequency radio transmission (LoRa, WMBus), for communications of only a few milliseconds
- on-board energy management algorithms to achieve more than 15 years of battery life, reducing maintenance and waste
- software optimisation, by reducing the volumes of data exchanged and the frequency of readings without loss of user performance.

Since 2019, the average consumption of products marketed by Sagemcom has fallen by 33%.

Not only do the products consume less, they also allow end users – both individuals and businesses – to reduce their own energy footprint. Thanks to smart meters, millions of homes in Europe and around the world can now manage and reduce their energy consumption.

On a larger scale, smart meters give network operators real-time access to energy consumption and production, peak detection and anticipation, and usage analysis. These devices therefore become levers for the implementation of energy efficiency policies and control of supply and demand.

Product circularity and end-of-life

The circular economy is now an essential model for meeting the environmental challenges arising from the overconsumption of resources and the accumulation of waste. In the electronics industry, this approach is critically important, as electronic equipment generates millions of tonnes of waste every year, much of which is still not recycled properly. To address this issue, Sagemcom has adopted concrete strategies to extend the lifespan of products, reduce their ecological impact and promote their reuse.

Electronic products, such as internet boxes, smart meters or set-top boxes, are made of many materials, sometimes rare ones (metals, plastics, chemical components), and their manufacture and use require a certain amount of energy and natural resources to be consumed. The circular economy aims to limit the impact of this consumption using three key principles: reduce, reuse, recycle.

All the actions carried out by Sagemcom are presented in the chapter on circularity (page 38).

2.7 Responsible management of upstream and downstream transportation

Controlling the environmental footprint also requires careful, innovative management of logistics flows, from the transportation of components to the delivery of finished products. Sagemcom is committed to reducing the environmental impact of transportation throughout its value chain.

As regards upstream transportation, Sagemcom works closely with its suppliers to optimise routes and prioritise means of transport with the lowest CO₂ emissions. Some of the Group's key actions include:

- prioritising transportation by rail and sea, which is much less polluting than transportation by air or road
- building a local ecosystem by selecting suppliers close to the plants where possible.

As regards downstream transportation, products are transported around the world with a constant focus on reducing distribution emissions:

- partnerships with carriers committed to the energy transition

(low-emission vehicles, biofuels, ISO 14001 certifications, etc.)

- experimenting with new, less polluting means of transport such as sailing boats
- manufacturing close to customers, particularly in Europe, with manufacturing sites in France, Germany, Italy and Tunisia
- optimising packaging to reduce the volume and weight transported, thereby reducing the carbon impact per product delivered.

Measuring, improving and innovating

Sagemcom manages the environmental impact of its logistics operations using key performance indicators (GHG emissions, mileage, ecological freight rate).

Impact of transportation in tCO₂

GHG number	Sources of emissions	2019	2020	2021	2022	2023	2024
3-4	Upstream freight and distribution	2,977	2,937	3,228	7,509	4,355	9,247
3-9	Downstream freight and distribution	29,910	29,503	32,425	62,510	43,750	15,902

By working on its upstream and downstream transportation, Sagemcom confirms its determination to build a more sustainable logistics chain, in line with its climate commitments and those of its customers.

2.8 Environmental risk analysis

Sagemcom's operational sites are ISO 14001-certified. Environmental risk analyses are conducted and systematically renewed every year in order to identify and address the most significant environmental aspects of our activities.

Sagemcom is determined to control the environmental aspects of its sites, such as pollution of the air, water and soil, noise pollution, waste production (water, energy, etc.) and the management of hazardous substances. These measures are taken in the Group's establishments under the responsibility of the Site Manager, in close collaboration with the environmental officers and the Group's CSR Department, and according to continuous improvement processes.

The Group's two main industrial sites, located in Tunisia, are particularly close to the heart of Sagemcom's environmental concerns and benefit from specific energy controls in the form of an ISO 50001-certified management system.

2.9 Measuring suppliers' environmental commitment, through the CDP

Sagemcom is a member of the CDP (Carbon Disclosure Project), an organisation that aims to release data on the environmental impact of large companies and to support them through change via a strict rating system. 2024 marked a major step forward in the involvement of suppliers in the CDP approach. 83 suppliers were surveyed, identified by their position in the Group's most carbon-intensive portfolios, with a response rate of 97% of suppliers, well beyond industry averages.

And to be based on a fair and relevant analysis, an internal rating complementary to that of the CDP has been developed to better respond to the Group's specific challenges, since it focuses on responses to decarbonisation commitments. The closer these are to those of Sagemcom, i.e. net zero by 2040, the more the supplier's maturity is valued, and vice versa. This ramp-up makes it easier to identify the suppliers who are the furthest behind on these issues and implement targeted actions to help them move forward!

Sagemcom ratings	Comments
1/6	No carbon footprint
2/6	Carbon footprint in Scopes 1 & 2 and transition plan
3/6	Carbon footprint in Scopes 1, 2 & 3 or in Scopes 1 & 2 with SBTi approval of Scopes 1 & 2
4/6	Carbon footprint in Scopes 1, 2 & 3 with transition plan and SBTi approval in Scopes 1 & 2
5/6	Carbon footprint in Scopes 1, 2 & 3 with SBTi approval
6/6	Carbon footprint in Scopes 1, 2 & 3 with SBTi approval Net Zero by 2040

3. Targets and indicators

3.1 Indicators and targets related to climate change mitigation and adaptation

Sagemcom's trajectories are clearly defined, and approved by the SBTi:

- by 2030:
 - a 47% absolute reduction in Scope 1 and Scope 2 emissions (direct emissions and purchased energy)

- 100% renewable energy consumption across all Group sites
- a 31% absolute reduction in Scope 3 emissions, including those related to the value chain, with no exclusion of any GHG categories
- by 2040:
 - Achievement of Net Zero, corresponding to a 90% reduction in total Group emissions compared to the 2019 baseline.

Scope 1 & Scope 2:

	Scope 1 (tonnes of eCO2)	Scope 2 (tonnes of eCO2)		Scopes 1+2 combined (tonnes of eCO2)	
		location-based approach	market-based approach	location-based approach	market-based approach
2022	2,637	9,096	8,602	11,733	11,239
2023	3,802	9,150	8,761	12,952	12,563
2024	1,192	7,893	7,968	9,085	9,160

Pillar 1 - 2024 mission-driven company indicators

Operational targets	Indicators	2024	Trajectory
By 2030, reduce our emissions by at least 47% in our Scopes 1 and 2 (target approved by the SBTi based on 2019), and cover our sites with 100% renewable energy	Sagemcom sites Scopes 1+2: Direct & indirect emissions Gas & Elec & Refrigerant + Fuel oil	-18% vs 2019	
	Sagemcom site Scope 3: Waste & Water	NHIW: +18% HW: -16% Water: +3.7% } vs 2023	-47% Scopes 1+2 by 2030 -31% Scope 3 2030
	Impact of Transportation (average CO ₂ impact per t.km)	-53% VS 2023	
Contribute to the ecological transition by taking part in concrete actions in our ecosystem	External contributions (workshops, memberships, speeches, etc.)	4	5 events/year by 2025
	% of products sold contributing to the energy transition	22%	100% of new products launched in 2030

Scope 3:

GHG number	Sources of emissions	2024	2023	2022	2019	Change in 2024 compared to the 2019 baseline
3-1	Purchased goods and services	618,534	872,783	978,220	1,093,224	-43%
3-2	Capital goods	4,109	973	612	665	518%
3-3	Fuel- and energy-related activities (not included in Scopes 1 and 2)	3,197	4,168	3,874	2,849	12%
3-4	Upstream transportation and distribution	9,247	4,355	7,509	2,977	211%
3-5	Waste generated by activities	241	1,741	39	1,190	-80%
3-6	Business trips	3,816	6,293	4,375	4,302	-11%
3-7	Employee commuting	93	1,280	798	875	-89%
3-8	Upstream leased assets	6,470	13,527	-	9,248	-30%
3-9	Downstream transportation and distribution	15,902	43,750	62,510	29,910	-47%
3-10	Processing of sold products	not calculated, irrelevant	not calculated, irrelevant	not calculated, irrelevant	not calculated, irrelevant	not calculated, irrelevant
3-11	Use of sold products	2,193,535	3,063,609	3,337,500	3,803,155	-42%
3-12	End-of-life treatment of sold products	31,632	55,652	58,884	64,050	-51%
3-13	Downstream leased assets	not calculated, irrelevant	not calculated, irrelevant	not calculated, irrelevant	not calculated, irrelevant	not calculated, irrelevant
3-14	Franchises	not calculated, irrelevant	not calculated, irrelevant	not calculated, irrelevant	not calculated, irrelevant	not calculated, irrelevant
3-15	Investments	not calculated, irrelevant	not calculated, irrelevant	not calculated, irrelevant	not calculated, irrelevant	not calculated, irrelevant
3-15a	Other downstream indirect emissions	not calculated, irrelevant	not calculated, irrelevant	not calculated, irrelevant	not calculated, irrelevant	not calculated, irrelevant

All product lifecycle mitigation measures (upstream freight, manufacturing, downstream freight, use of sold products, and end-of-life of products sold) resulted in a 31.63% reduction in carbon intensity of GHG emissions (kgCO₂e/ products sold) in 2024 compared to the 2019 baseline.

Pillar 2 - 2024 mission-driven company indicators

Operational targets	Indicators	2024	Trajectory
Reach net zero (as defined by the STBi) in 2040 in our SCOPE 3 through innovation and the eco-design of our products and services	percentage of best bidding in our product lines compared to electricity consumption standards	AVS (Audio Video Solutions): -70% vs VIA (Voluntary Industry Agreement) BBS (Broadband Solutions): -31% vs CoC (Code of Conduct) BLE (Business Line Energy): N/A	Scope 3: -31% in 2030, then net zero in 2040
	% of alternative materials purchased versus virgin materials (plastic and metal)	33.65%	
Develop innovative alternatives that use fewer controversial substances, and offer them to our customers	% of halogen-free components in the article base	76.2% (PARTS)	50% of materials declarations and 50% of Halogen Free components available in 2025. 100% in 2030
	Traceability of chemicals: article base covered by comprehensive materials declarations	36.6% (PARTS)	

Customer Sustainability Awards

In recent years, Sagemcom has distinguished itself through its ambitious sustainable innovation policy and has been regularly rewarded by its ecosystem.

- Sagemcom received the Deutsche Telekom “Green Future Best Practice Award”, in recognition of the effectiveness of its hardware and software solutions in significantly reducing Deutsche Telekom’s Scope 3.
- At the KPN Supplier Event, Sagemcom was awarded the “Sustainability Award” for its many innovations in eco-design.
- Sagemcom received the “Orange Decarbonisation Award” for its work in eco-design and decarbonisation.
- Finally, the Tunisian-French Chamber of Commerce and Industry honoured Sagemcom for its social and environmental commitments, promoting the CSR performance of all its Tunisian sites.

Pollution

1. Pollution policies

1.1 Environmental management system

The Sagemcom Group's main sites are ISO 14001-certified, and are therefore structured around a continuous improvement system based on planning, risk analysis through AES (Significant Environmental Aspects) databases and the implementation of processes and procedures for integrating environmental issues, and in particular pollution, into the heart of daily concerns and mitigating any risks.

1.2 Soil pollution

Sagemcom's activities do not involve directly using the soil. However, since it manages its own facilities and manufacturing processes, the Group implements strict measures to prevent any risk of accidental leakage that could lead to soil pollution. These measures include reducing the amount of chemicals that could pollute the soil, as well as establishing procedures, training and tests to effectively anticipate and manage potential emergencies.

In 2024, no leaks or soil pollution were reported on Sagemcom's sites. Equivalent soil protection requirements are imposed on the Group's industrial partners. These aspects are systematically verified in the course of audits conducted at suppliers' sites.

1.3 Atmospheric pollution

The location of Sagemcom's production sites, often in the vicinity of urban areas, makes it increasingly important to control atmospheric emissions. The Group's industrial processes do not generate many heavy metal pollutants, the main emissions coming from printed circuit board soldering operations. The production lines are equipped with extraction and filtration systems to limit these emissions.

Sagemcom has regular audits conducted by third-party organisations to ensure that these emissions comply with regulatory limits.

The Group applies similar standards to its suppliers, whose facilities and results are checked during on-site audits. Furthermore, transportation emissions are addressed as part of Sagemcom's global carbon reduction programme.

2. Actions and resources related to pollution

2.1 Waste management

The Group is striving to manage and reduce its waste, as a logical continuation of its status as a mission-driven company and its ISO 14001 certification. In addition to regulatory obligations, partnerships with

different service providers have been established to optimise the quantities generated at source and the recycling channels. Each site sorts its fractions of waste according to the disposal channels that are available locally. Sagemcom is also working to reduce the waste at source generated by its products, and to optimise product deconstruction in order to allow for refurbishing, etc. Here are some examples of the measures that have been taken to reduce the quantity of waste produced by our manufacturing plants:

- the raw materials from local suppliers are shipped in refundable plastic containers, instead of disposable cardboard boxes
- third-party packaging that is properly adapted to the product families, thereby reducing the use of film and spacers and reducing the transported weight, without compromising the protection and safety of the product
- removal of plastic packaging for accessories, such as cables, power supplies, heat sinks, casings, etc.

Sagemcom also facilitates the recycling of its appliances, right from the design phase (see paragraph on the management of resource outflows in the “circular economy” section).

2.2 Process water

The Group’s water metering activity requires water to be used for product qualification, particularly in Tunisia. Sagemcom has opted to develop the production line necessary for manufacturing these meters in-house, to minimise the consumption of such water, while respecting the metrological rules and requirements necessary for a metering activity.

In 2024, the volume of water used for product qualification was 3,185m³ at the Ben Arous industrial site, which manufactures smart water meters.

3. Pollution indicators and targets

In 2024, the Group concentrated on monitoring potential sources of pollution and preventing any incidents that could result in pollution.

In 2025, Sagemcom plans to deploy input and/or outcome indicators for the quantity of waste produced and how well it is sorted.

Water and marine resources

1. Water resources policies

1.1 Water management

As a signatory of the United Nations Global Compact, Sagemcom is committed to operationalising Sustainable Development Goal (SDG) No. 6, which aims to “achieve universal and equitable access to safe drinking water, hygiene and sanitation by 2030, particularly for vulnerable populations”. Because water is a scarce resource, Sagemcom advocates reasonable and integrated water management for all its sites, taking into account the availability of fresh water as well as the risks of pollution. The Group’s environmental policy, based on the ISO 14001 standard, makes it possible to establish a known and shared framework, as well as prevention and corrective action plans if necessary.

Sagemcom’s water management policy covers the following points:

- at all Group sites, ensure regulatory compliance defined by local and/or national authorities with water resources management, particularly in terms of withdrawals and discharges
- promote efficient and reasonable use of water in all circumstances
- preserve water resources and aquatic or marine environments by developing solutions to count, recycle and balance water networks
- use the ISO 14001 standard to set up prevention plans and identify any corrective actions
- reduce the amount of water withdrawn and consumed at our sites
- ensure that water, particularly process water, is not in contact with hazardous substances in order to guarantee sustainable use of water and not to generate pollution
- control/reduce/eliminate water pollution where it exists.

2. Actions and resources related to water and marine resources

2.1 Water consumption at Sagemcom’s sites

Sagemcom’s sites are mostly located in areas where fresh water is available and most of the water that Sagemcom consumes is used for sanitary purposes. In this regard, every site has set consumption indicators and targets in order to actively measure and reduce water consumption by taking various actions: reduction of the quantity of water used to flush toilets, taps that reduce the water flow-rate and reuse of the grey water on the Group Campus. In 2024, the Campus water consumption fell by 18% compared to the consumption recorded on the former site that the Group left in December 2023.

This was achieved through several measures taken in this new building:

- fittings that save water: hand basins (maximum of 2 litres per minute, compared with the previous consumption of 12 litres per minute), dual

flush toilets (3/6 litres) and showers (6 litres per minute)

- filtering, cleaning and reuse of the grey water (from hand basins to toilets)
- monitoring of consumption with metering per use (sanitary/maintenance/technical equipment), leak detection systems and rainwater sensors that dynamically adjust water consumption for green spaces.

In the sphere of production, two of the Sagemcom Group's manufacturing sites are located in Tunisia, in regions exposed to water stress. Very close attention is therefore paid to water consumption at these sites.

2.2 Product impact

Sagemcom's product life-cycle analyses include water consumption and pollution. This makes it possible to identify the key components impacting water resources and analyse the effects of design choices to prevent pollution transfer, while ensuring that reductions in carbon impact do not adversely affect water.

2.3 Supply chain

Sagemcom does not currently set specific targets related to water and marine resources in its value chain, although the Group does ensure that its partners and suppliers adhere to sector-specific environmental standards, such as the Responsible Business Alliance (RBA) Code of Conduct for activities identified as the most sensitive for water management and/or exposure to pollution risks. The Group pays close attention to the risks of exposure to water scarcity and pollution that could impact workers in the value chain and/or local communities. Finally, all the Group's suppliers are committed through the signing of an Ethical Charter, which is essential for any business relationship (see page 108), which devotes several chapters to water management (prevention and use of resources, wastewater and rainwater management, etc.).

3. Indicators and targets related to the reduction of water consumption

The Sagemcom Group's water management indicators (consumption and pollution) are guided in particular by the processes implemented under the ISO 14001 standard.

Water consumption is monitored according to centralised reporting, with more or less fine granularity depending on the specificities of the Group's sites. Indeed, some very modern buildings such as the Group's Campus can be monitored and managed very accurately using several sub-meters; at

the opposite end, some of the Group's sites are located in shared buildings, which makes it impossible to obtain an accurate overview of Sagemcom's specific consumption.

In 2024, the Sagemcom group's overall consumption was 65.5 thousand m³, an increase of 9% compared to 2023. This increase is due in particular to our Mexican subsidiary and our new plant in Vietnam being included in our reporting. On a like-for-like basis, our water consumption is stable.

Water pollution is regularly monitored through outflow samples in order to check the various quality parameters of the discharges and take action if necessary.



Biodiversity and ecosystems

1. Action and resources related to biodiversity and ecosystems

The impact of the Sagemcom Group's activities on biodiversity is examined in the annual environmental analysis in accordance with the ISO 14001 standard. Every year, the impacts on water, air and soil are assessed by means of an environmental analysis. The impact on plants, animals and human habitat is also closely monitored. By way of example, numerous initiatives have been taken at Sagemcom's new head office to preserve biodiversity:

- decision to locate a property development on a previously built area, meaning that land of low ecological value was reused, instead of destroying virgin land
- a limited number of local wild animals, identified as being a minor concern
- an effort to green the site by covering approximately 9% of the waterproofed surfaces with plants. More than 70% of the varieties of plants are local and more than 60% are of interest to the local fauna, in particular to nourish pollinators, birds and other small animals, and to provide refuge and spaces for reproduction or nesting
- the installation of additional equipment to encourage biodiversity, such as nesting boxes, anti-insect shelters and anti-reflective glass
- 400 m² of flowered fallow land has been set up on the Dinan site in order to encourage local biodiversity.

To date, biodiversity does not appear to be material for Sagemcom. However, the Group plans to conduct an analysis in the next few years, based on the GBS (Global Biodiversity Score) methodology, and on an analysis based on AXA Climate tools.

Resource use and circular economy

1. Resource use and circular economy policies

The circular economy is now an essential model for meeting the environmental challenges arising from the overconsumption of resources and the accumulation of waste. In the electronics industry, this approach is critically important, as electronic equipment generates millions of tonnes of waste every year, much of which is still not recycled properly. To address this issue, Sagemcom has adopted concrete strategies to extend the lifespan of products, reduce their ecological impact and promote their reuse.

Electronic products, such as internet boxes, TV set-top boxes or smart meters, are made of many materials, sometimes rare ones (metals, plastics, chemical components), and their manufacture and use require a certain amount of energy and natural resources to be consumed. The circular economy aims to limit the impact of this consumption using three key principles: reduce, reuse, recycle.

1.1 Sagemcom's commitment to the circular economy

For several years, Sagemcom has been committed to a proactive circular economy approach, according to a policy based on several aims:

- reducing the extraction of natural resources
- using alternative materials
- facilitating refurbishment
- extending lifespan
- managing end-of-life
- closing the loop.

These principles are set out in the “Global Policy on Working Conditions, Respect for Human Rights and Environmental Protection” which governs the Group’s actions, as well as in the Ethical Charter which applies to Sagemcom’s entire value chain. This Ethical Charter is aligned with the Responsible Business Alliance (RBA) Code of Conduct, which is itself based on international standards.

Aware of how important circularity is, the Group has included using alternative materials in its commitments as a mission-driven company, setting ambitious goals, particularly in the use of alternative materials in its products. As the introduction of recycled materials in products most often entails additional costs for customers, its deployment continues in agreement with customers whenever projects allow it.

Sagemcom is also represented on the Board of Directors of Ecologic, an eco-organisation approved by the French government for the collection and treatment of Waste Electrical and Electronic Equipment (WEEE).

2. Actions and resources related to resource use and the circular economy

2.1 Reducing the extraction of natural resources

Sagemcom miniaturises its products as much as possible to reduce the quantities of materials used, by reducing the surface area of electronic circuit boards thanks to increasingly integrated components, and optimising the quantities necessary for the thermal management of products.

As far as possible and in agreement with its customers, the Group develops its products so that they can be reused (refurbished). The result is a design that allows the main components to be separated or work on plastics, for example, so that they are resistant to scratches, which would make them unsuitable for reuse.

2.2 Using alternative materials

Sagemcom designs its products by incorporating recycled materials into the plastic enclosures of many devices. In 2024, 33% of the plastics used by the Group were post-consumer recycled (PCR) plastics, used mainly in the Group's set-top boxes and internet boxes. These plastics are certified, come from controlled recycling loops, and guarantee the mechanical performance and aesthetics of the finished products. More specifically, within the scope of Sagemcom Broadband, 65% of plastics come from recycling channels, a percentage that has been growing continuously since 2018, when Sagemcom launched the introduction of recycled plastics in its designs on the Broadband market, with the Orange Group.

For Sagemcom Energy & Telecom's smart meters, Sagemcom is committed to developing the use of bio-based plastics, in order to break free from petroleum-based materials.

As for metals, Sagemcom has identified recycled aluminium alloys for its heat sinks, drastically reducing the environmental impact related to the manufacture of its products, while guaranteeing that the origin of these materials can be traced to ensure that they are indeed recycled metals. Surface treatments of these parts are eliminated as much as possible, and new solutions are currently being studied to reduce the impact of the materials used in the Group's products, particularly in printed circuit boards and accessories, in order to continue to reduce their environmental impact.

Finally, it should be noted that Sagemcom is careful to choose materials that are compatible with the recycling phases. Its products are then assembled

in such a way as to make it easier to dismantle them and separate the different components.

2.3 Facilitating product refurbishment

Sagemcom takes the reconditioning of its products into consideration right from the design phase, making it easy to refurbish, repair or re-manufacture through reversible assembly methods, work carried out in partnership with its customers and refurbishment companies to diagnose and repair products, while minimising the replacement of parts. Detailed instructions (dismantling guides) and specific tools are provided to the Group's partners to refurbish products as efficiently as possible. This avoids the premature disposal of millions of devices.

Thanks to its experience in design and partnerships with recyclers, Sagemcom has introduced a recyclability evaluation for its products. It evaluates the benefits of design methods, with a focus on end-of-life. This evaluation takes account of several parameters:

- the materials used
- the assembly techniques
- the known results of the WEEE processing channels

The evaluation attempts to be realistic, with three possible processing scenarios, ranging from refurbishing to direct destruction.

2.4 Extending the lifespan of products

To reduce the environmental impact of its products, Sagemcom works with its customers to deploy innovative and high-performance solutions that enable them to evolve over their lives in the field. Consequently, a first generation of internet boxes for the French market has been recovered to be re-manufactured with a new, more efficient embedded generation of Wi-Fi. By making it possible to keep the majority of the previous generation's electronics and the products' plastic enclosures and accessories, this new generation has a reduced impact of 58% compared to a new product.

2.5 Managing product end-of-life, when it is Sagemcom's responsibility

Whenever the Group is responsible, Sagemcom participates in approved collection systems for the recycling of its products. However, for recycling to be optimised, specific consideration needs to be given to these aspects right from the design phase. This is a constant concern at Sagemcom, which ensures that material parts can be separated, so as not to pollute the habitat with incompatible materials; provides precise information on dismantling; and calculates the recyclability of products to set improvement targets in this area.

On request, Sagemcom provides recycling operators with dismantling guides in a bid to encourage the recycling of its old products. These guides contain all the information required to optimally recycle and reuse the machines:

- a bill of materials (metals, plastics, electronic circuit boards, etc.)
- the location of the components to be separated (as per the WEEE directive)
- the dismantling steps
- the potential risks for recycling operators (sharp metal edges, etc.).

Closing the loop

Sagemcom is constantly looking for ways to improve and go one step further. Based on the principle that a used product is a potential resource to be used, the Group actively participated in the Neocircuit Router project, conducted with Deutsch Telekom and other partners, which demonstrated the concept of direct reuse of components. Dismantled components from old boxes were tested and reassembled on a new design, together with new components and an electronic circuit board recovered from old phones, to create a functional router. The resulting product achieved an impressive 70% of recovered components (as a whole), for a reduction in environmental impact estimated at around 50%. Even though the industrialisation of such a solution has yet to be demonstrated, this project has shown that there are still many sources of innovation in the field of circularity.

2.6 Towards a more responsible electronics industry

Sagemcom has shown by example that the transition to a circular economy in electronics is not only possible, but also beneficial both for the environment and for business competitiveness. By developing the entire life cycle of products, promoting their reuse and reducing waste, industrial players such as Sagemcom contribute to a more sustainable and innovative model.

3. Indicators and targets related to resource use and the circular economy

3.1 Compliance with standards

All of Sagemcom's circularity actions are assessed at product level, for example through the ITU-T L.1023 standard on the circularity of electronic products, thereby making it possible to detect new ways to improve regarding the reparability and circularity of the Group's solutions. This standard has been applied to a representative sample of products, making it possible to identify concrete courses of action.

Sagemcom is committed to significantly increasing its share of recycled

materials. One of its mission targets is for the percentage of recycled materials, all activities included, to reach 45% by 2027.

3.1.1 Percentage of alternative materials (recycled or bio-based)

	2021	2022	2023	2024	2025	2026	2027
Goals	15%	20%	25%	30%	35%	40%	45%
Group result	15%	20%	25%	33%			

3.2 Resource outflows

The Group is striving to manage and reduce its waste, as a logical continuation of its status as a mission-driven company and its ISO 14001 certification. In addition to regulatory obligations, partnerships with different service providers have been established to optimise the quantities generated at source and the recycling channels. Each site sorts its fractions of waste according to the disposal channels that are available locally. Waste management is taken into serious consideration, since Sagemcom aims to reduce its Scope 3 in order to achieve the decarbonisation goals set and approved by the SBTi (Science Based Targets initiative).

Sagemcom is also working to reduce the waste at source generated by its products, and to optimise product deconstruction in order to allow for refurbishing, etc.

Here are some examples of the measures that have been taken to reduce the quantity of waste produced by Sagemcom's manufacturing plants:

- the raw materials from local suppliers are shipped in refundable plastic containers, instead of disposable cardboard boxes
- third-party packaging that is properly adapted to the product families, thereby reducing the use of film and spacers and reducing the transported weight, without compromising the protection and safety of the product
- removal of plastic packaging for accessories, such as cables, power supplies, heat sinks, casings, etc.

Sagemcom also facilitates the recycling of its appliances, right from the design phase.

The combination of different types of materials can impact the recyclability of the appliance. Sagemcom thus takes care to choose materials that are compatible with the recycling processes. Its products are then assembled in a way that facilitates their deconstruction and the separation of the various components.

Company workforce

1. Company workforce

1.1 HR policies

Sagemcom's priorities for its employees are clearly defined and presented in the results of the double materiality analysis, and form the basis of the Group's action in terms of:

- attracting and retaining talent
- promoting diversity, equity and inclusion
- health, safety and quality of life at work
- promoting and respecting fundamental rights.

The material sustainability issues identified above are covered by several policies within Sagemcom, which are implemented by the Group Human Resources Department. In general, the policies described below apply to every employee in every entity. All of the policies therefore concern all Sagemcom employees, regardless of their place of work and type of contract (permanent, fixed-term, work-study, etc.), under the responsibility of the Group's Chief Human Resources Officer.

1.2 Talent development policy and employee skills management

Sagemcom follows a "Global Policy on Working Conditions, Respect for Human Rights and Environmental Protection", which makes respect for human rights, anti-discrimination, social dialogue, professional development, training and skills development as well as work-life balance its core principles, the foundations of a common commitment to sustainable, ethical and socially responsible performance.

It is further enforced by Sagemcom's statutory commitment to the professional development of its employees, the 5th pillar of the Sagemcom mission's articles of association: "Helping our employees to pursue their professional development throughout their career in the Group by sharing our values and promoting diversity", a commitment whose quality, relevance and truthfulness are regularly audited by an independent third party.

1.2.1 Encouraging and diversifying careers in the Group

To support the professional development of its employees and retain them, Sagemcom implements various measures throughout their careers within the Group, allowing it to offer them rich and rewarding careers. This commitment encourages employee attachment to Sagemcom. This attachment is reflected in the average length of service of employees at the Group's Campus and head office, for example, which is 13 years — an indicator that stands out as an exception in the sector.

The publication of a job mobility charter has made it possible to define the policy targeted by the Group in this area. Mobility promotes creativity and greater dynamism in our business, opens up business units and mixes professional experiences and backgrounds conducive to the development of our organisation and the women and men within it. For this reason, all vacancies are open to internal candidates and are published on a vacancies site, which can be accessed by every employee.

This information was completed by the setting up of recruitment/mobility committees to facilitate and supervise the careers of employees within the Group. France has set itself the target of filling one third of its vacancies through internal mobility. For over 5 years, this percentage has hovered around 45%.

In addition, employees can indicate their wish to change jobs, both within their subsidiary and the Group, be it cross-company, vertically or geographically, during their Individual Development and Performance Reviews (EIDP) and/or, for employees working in France, their professional review. These aspirations are carefully analysed by the HR teams and fed back to the managers who take them into consideration when defining career paths within the Group. For instance, our Brazilian manufacturing site promotes versatility and cross-functional mobility by entrusting operators with tasks that go beyond their own scope, allowing them to develop skills.

Sagemcom also supports the diversity of professional careers by promoting its “Experts” career path, alongside the managerial path. It allows us to recognise the expertise and acquisition by certain employees of specific skills in a key area for the Group. The skills of those Experts are acknowledged through knowledge-transfer programmes and their role as company representatives. In return, the Group capitalises on and invests in areas of strategic expertise, which ultimately boost its performance (see page 52 – paragraph on the Expert career path).

In addition, the Group’s strategic directions are set out in training catalogues that help identify training needs. These are collected through the EIDPs and analysed by the HR teams. They are then implemented in our various subsidiaries as part of skills development plans. Therefore, nearly 3% of the payroll is invested in France each year to develop the skills of our employees.

1.3 Actions and resources related to the company’s workforce

1.3.1 Roll-out of the HRIS

In 2023, coming into full effect in 2024, Sagemcom rolled out MyHR Solutions, an integrated Human Resources Information System (HRIS) that centralises and digitises all human resources missions, including

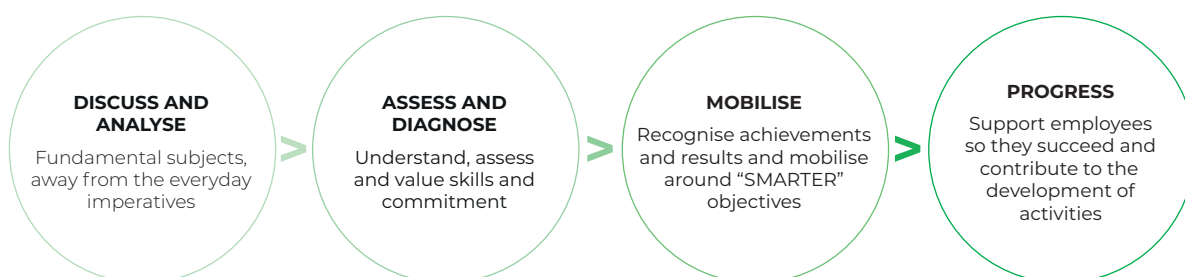
employee data management, annual performance review (EIDP) and professional review management, training, careers, recruitment and compensation.

This new tool centralises the Sagemcom repository of jobs and skills, listing all the functions that exist within the Group in order to provide a comprehensive map of the skills available in the company. That makes it easier for HR Departments, as well as managers and employees, to trace future career developments within Sagemcom. An “internal mobility” section offers everyone the chance to play a proactive role in their own professional mobility, since the application lets all employees consult the list of open positions, apply and track the progress of their application.

1.3.2 Managing and supporting performance, development and progress

The Individual Development and Performance Review (EIDP), which is in fact centralised in MyHR Solutions, is the starting point for building career paths at Sagemcom, and takes place each year in all of the Group’s subsidiaries. It is one of the key pillars of Sagemcom’s Human Resources policy. Their completion rate, analysis and associated action plans are also a target in the 5th pillar of Sagemcom’s mission (see p. 74).

The manager, the employees and the company have a shared interest in this review, because it helps to achieve four major objectives with the common goal of making individual and collective progress:



Conducting these reviews controls the Group’s individual and collective skills through the implementation of concrete measures that support the professional development of employees (training, individual action plan, professional development, etc.). In France, all of our employees also benefit from a tri-annual career plan review, focusing on their prospects for professional development in order to enable them to actively take part in our own development.

The Group continues to systematise the analysis and circling back of these reviews with managers in order to define the necessary action plans (skills development through training, career path, professional mobility, new responsibilities, etc.) to be implemented to promote its employees’ professional development.

In 2024, 98% of EIDPs were completed for the first time in the new My HR Solutions tool, 100% were analysed, and 97% were circled back with managers, for a 2025 trajectory of 100% of EIDPs analysed and circled back. It should also be noted that even EIDPs that have not been completed are circled back with managers.

1.3.3 Training, to develop and adjust skills

Sagemcom sees training as an investment for the future, a tool for improving economic performance and addressing social issues. In addition, the ability to identify the skills needed to anticipate development and meet market and customer requirements is a key factor in competitiveness. Training is therefore a real lever for optimising the potential and performance of the Group's employees.

Consequently, every year, the Group devotes significant efforts to adapting, maintaining and developing the skills of our employees. For example, in France, 3% of the annual payroll is spent on skills development.

Finally, it should be noted that in 2024 Sagemcom renewed the implementation of a Job and Career Management (GEPP) agreement, under which employees and the company can use individual training accounts to co-build a career plan. The co-investment training accounts were opened to encourage employees to co-build training projects that meet Sagemcom's skills requirements, while also contributing to the professional development of the beneficiaries.

In line with its Group policy, Sagemcom ensures that all of its employees have access to fair and non-discriminatory training. Special attention is also paid to employees who have not received training for 3 years, a practical and effective way of supporting the employability and development of all teams throughout their careers.

At the Group's subsidiaries, training measures are rolled out to meet local needs, tailored to the local context. Here again, this dynamic is also driven by Sagemcom's mission, which has provided the framework for 3 key training areas in 2024: specific safety training for subsidiaries subject to management and site management, training in non-discriminatory recruitment and training in environmental protection via the Climate Fresk.

1.3.4 Preventing sexist behaviour and sexual harassment

As part of its Diversity commitments, Sagemcom wanted to implement a new training course on "Preventing sexist behaviour and sexual harassment". This training is mandatory for all employees in France (initially), and has three goals: ensuring a respectful and safe working environment, promoting equality and inclusion and reinforcing corporate culture. Over 90% of French employees completed this training, which

was very well received and which provided an opportunity to reaffirm and disseminate the values of respect, inclusion and kindness.

1.3.5 Measuring training effectiveness

Sagemcom pays close attention to deploying training that is effective and responsive to business needs, in order to support the adaptation and development of skills. All of the training courses are assessed on the spot and later on. Conducted as part of the annual review, the subsequent assessment checks whether employees have been able to put into practice what they learned and how relevant it is to their job. If there is a demonstrable gap, the HR teams carry out an analysis and an action plan is defined in order to improve the effectiveness of the training.

Training catalogues are available for managers and employees to guide them and make it easier to identify needs in terms of skills development. In addition, the catalogues describe ambitious training programmes within the different sectors, to encourage people to plan their career development within the Group.

1.3.6 Implementation of an online training platform

The Group Human Resources Department offers all of Sagemcom's subsidiaries the Smart Academy, an e-learning platform available to everyone. This tool mainly offers made-to-measure digital modules that allow for agile training on a Group-wide scale. This platform offers a number of advantages by broadening the training offer, optimising training resources, building individual skills development programmes, offering easier access to training, etc. The digital training offer has gradually been expanded. In addition to the mandatory training courses (anti-corruption, cybersecurity, etc.), Smart Academy also offers professional courses.

In our R&D subsidiary in Hungary, skills development is taken into consideration as soon as induction takes place. Some e-learning programmes have become mandatory, because they play a crucial role in bringing new employees on board, helping them to find out more about our Group, our products, our project management modes, and so on. Other training courses (including in-person ones) are developed to meet identified needs, to help people develop their skills: they are available via an open access online training platform and include professional training, language training, etc. This e-learning platform is also a powerful means of facilitating the induction of new employees at Sagemcom.

1.3.7 Development and facilitation of the Experts career path

In order to maintain a high level of skill in their teams, Sagemcom is continuing to develop and drive our "Expert" community. In fact, to support the diversity of professional careers, Sagemcom has also created an "Experts" career path,

alongside the managerial path. It allows us to recognise the expertise and acquisition by certain employees of specific skills in a key area for the Group. Experts gain recognition for their skills particularly through their important role in the distribution and sharing of their knowledge (especially via internal training), in innovation and also in advising and supporting the teams or even influencing the Group. In return, the Group capitalises on and invests in areas of strategic expertise, which ultimately boost their performance.

For 5 years now, R&T has been sponsoring a major project to vitalise the Expert community in order to heighten its profile and develop synergies between the Experts. Various actions have been taken: working groups are developing strategic forms of expertise, a broad communication plan is promoting the profile and the reputation of the Experts in the Group, the Experts themselves are attending various events, including seminars, regular meetings and Techdays, and a new “A word from the Experts” column is regularly published.

In 2024, Sagemcom's Experts community had 26 members, divided into 3 levels of seniority: Emeritus Expert (1), Senior Expert (11) and Expert (14), and it has been an international community since 2020.

1.4 Indicators and targets related to the company's workforce

Total headcount by gender and by region

2022					
Total headcount (employees and other workers) by gender and by region	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	883	2,045	104	151	3,183
Women	388	2,913	45	90	3,436
Other	0	0	0	0	0
Not released	0	0	0	0	0
TOTAL	1,271	4958	149	241	6619
2023					
Total headcount (employees and other workers) by gender and by region	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	998	1,987	135	135	3,255
Women	370	2,497	51	81	2,999
Other	0	0	0	0	0
Not released	0	0	0	0	0
TOTAL	1368	4484	186	216	6254
2024					
Total headcount (employees and other workers) by gender and by region	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	925	1,833	123	120	3,001
Women	307	2,384	53	74	2,818
Other	0	0	0	0	0
Not released	0	0	0	0	0
TOTAL	1232	4217	176	194	5819

Total headcount by type of contract, by gender and by region

2022

Permanent employees	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	868	1,685	87	139	2,779
Women	300	1,937	41	84	2,362
Other	0	0	0	0	0
Not released	0	0	0	0	0
TOTAL	1,168	3622	128	223	5141

2023

Permanent employees	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	841	1,724	110	135	2,810
Women	297	2,000	48	81	2,426
Other	0	0	0	0	0
Not released	0	0	0	0	0
TOTAL	1138	3724	158	216	5236

2024

Permanent employees	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	817	1,675	101	120	2,713
Women	278	2,019	41	74	2,412
Other	0	0	0	0	0
Not released	0	0	0	0	0
TOTAL	1095	3694	142	194	5125

2022

Temporary employees	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	1	293	6	0	300
Women	1	610	0	0	611
Other	0	0	0	0	0
Not released	0	0	0	0	0
TOTAL	2	903	6	0	911

2023

Temporary employees	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	5	204	0	0	209
Women	2	447	0	0	449
Other	0	0	0	0	0
Not released	0	0	0	0	0
TOTAL	7	651	0	0	658

2024

Temporary employees	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	2	108	4	0	114
Women	1	329	0	0	330
Other	0	0	0	0	0
Not released	0	0	0	0	0
TOTAL	3	437	4	0	444

2022

Other workers (temporary staff, contractors, interns, freelance workers, subcontractors, etc.)	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	14	67	11	12	104
Women	87	366	4	6	463
Other	0	0	0	0	0
Not released	0	0	0	0	0
TOTAL	101	433	15	18	567

2023

Other workers (temporary staff, contractors, interns, freelance workers, subcontractors, etc.)	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	152	59	25	0	236
Women	71	50	3	0	124
Other	0	0	0	0	0
Not released	0	0	0	0	0
TOTAL	223	109	28	0	360

2024

Other workers (temporary staff, contractors, interns, freelance workers, subcontractors, etc.)	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	106	50	18	0	174
Women	28	36	12	0	76
Other	0	0	0	0	0
Not released	0	0	0	0	0
TOTAL	134	86	30	0	250

2022

Employees with non-guaranteed hours	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	0	0	0	0	0
Women	0	0	0	0	0
Other	0	0	0	0	0
Not released	0	0	0	0	0
TOTAL	0	0	0	0	0

2023

Employees with non-guaranteed hours	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	0	0	0	0	0
Women	0	0	0	0	0
Other	0	0	0	0	0
Not released	0	0	0	0	0
TOTAL	0	0	0	0	0

2024

Employees with non-guaranteed hours	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	0	0	0	0	0
Women	0	0	0	0	0
Other	0	0	0	0	0
Not released	0	0	0	0	0
TOTAL	0	0	0	0	0

Total headcount by contract term, by gender and by region

2022

Full time	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	873	2,044	98	151	3,166
Women	354	2,913	45	90	3,402
Other	0	0	0	0	0
Not released	0	0	0	0	0
TOTAL	1,227	4957	143	241	6568

2023

Full time	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	983	1,986	127	135	3,231
Women	341	2,497	49	81	2,968
Other	0	0	0	0	0
Not released	0	0	0	0	0
TOTAL	1324	4483	176	216	6199

2024

Full time	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	909	1,832	109	120	2,970
Women	281	2,384	53	74	2,792
Other	0	0	7	0	7
Not released	0	0	0	0	0
TOTAL	1190	4216	169	194	5769

2022

Part time	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	10	1	6	0	17
Women	34	0	0	0	34
Other	0	0	7	0	7
Not released	0	0	0	0	0
TOTAL	44	1	6	0	51

2023

Part time	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	15	1	8	0	24
Women	29	0	2	0	31
Other	0	0	7	0	7
Not released	0	0	0	0	0
TOTAL	44	1	10	0	55

2024

Part time	Europe	Africa and Middle East	America	Asia and Oceania	TOTAL
Men	16	1	7	0	24
Women	26	0	0	0	26
Other	0	0	0	0	0
Not released	0	0	0	0	0
TOTAL	42	1	7	0	50

Number of employees that have completed an EIDP by gender and by socio-professional category

		Number of workers	Number of worker EIDPs	Number of employees	Number of employee EIDPs	Number of engineers and managers	Number of engineer and manager EIDPs	Total number of employees	Number of engineer and manager EIDPs
2022	Men	545	44	1053	397	1446	1383	3,044	1,824
	Women	1,923	44	431	244	614	592	2,968	880
	Other	0	0	0	0	0	0	0	0
	Not released	0	0	0	0	0	0	0	0
2023	Men	536	32	977	362	1,508	1,468	3,021	1,862
	Women	1,824	34	419	247	630	597	2,873	878
	Other	0	0	0	0	0	0	0	0
	Not released	0	0	0	0	0	0	0	0
2024	Men	473	18	931	377	1,423	1,388	2,827	1,783
	Women	1,765	21	391	224	586	569	2,742	814
	Other	0	0	0	0	0	0	0	0
	Not released	0	0	0	0	0	0	0	0

		Men	Women	Other	Not released
Workers	2022	8%	2%	0%	0%
	2023	6%	2%	0%	0%
	2024	4%	1%	0%	0%
Employees	2022	38%	57%	0%	0%
	2023	37%	59%	0%	0%
	2024	40%	57%	0%	0%
Engineers and managers	2022	96%	96%	0%	0%
	2023	97%	95%	0%	0%
	2024	98%	97%	0%	0%
TOTAL	2022	60%	30%	0%	0%
	2023	62%	31%	0%	0%
	2024	63%	30%	0%	0%

2. Social dialogue and collective bargaining agreements

2.1 Social dialogue and collective bargaining policy

2.1.1 Dialogue between management and labour as a vector of sustainable social support

Employee relations within the Sagemcom Group are the responsibility of the managers of each of the sites in the various countries in which the Group operates, in conjunction with the Group Human Resources Department. Some countries allow the establishment of social dialogue structured around regulated bodies (for example in Tunisia and France). Negotiations are held with the representative trade unions within the Group's legal companies on social policy issues.

Through this social dialogue, Sagemcom strives to find the optimal balance between the needs of the company and the interests of employees, in order to better support the development of its activities and the people who contribute to them.

It should be noted that over 90% of the Group's employees are covered by collective bargaining agreements.

2.2 Examples of actions and resources related to social dialogue and collective bargaining agreements

2.2.1 In France

The Works Council in France has 28 employee representatives. In 2022, it was renewed for a 4-year term.

In 2024, 18 meetings were held during which topics related to Sagemcom's current issues were presented, with reference to strategic, financial, environmental and social aspects.

At corporate level, 2024 was marked in particular by the signing of a Job and Career Management Agreement. This provides for innovative measures in terms of the development and continued employment of healthy senior employees (via the fight against sedentary lifestyles, for example) and the revitalisation of career development.

Different ongoing agreements and action plans continued to take effect throughout the year (diversity, psychosocial risk prevention plan, work-life balance, remote working, etc.). They are the subject of a specific communication in the "Social dialogue" section of the Intranet, allowing employees to consult them at any time, and are followed up each year, at which time the adjustments to be considered and the progress made are shared within the framework of a joint monitoring committee.

2.2.2 In Tunisia

The last few years have been marked by a particularly rich social dialogue. Based on feedback in the aftermath of the pandemic, Sagemcom's SS&T subsidiary (R&D centre in Tunisia) was one of the first Tunisian companies to negotiate and sign a remote work agreement with the main union, including the creation of a monitoring committee, a sure sign of rich, open-minded social dialogue.

Social dialogue within Sagemcom takes various forms. In addition to the dialogue with the employee representative bodies, which is essential, it forms an integral part of the daily relationship between employees and management. It is a cornerstone of the Group's culture of dialogue.

Throughout the year, there are key times in the company's life, allowing all employees access to transparent information on financial results, major achievements and strategic prospects. Twice a year, direct discussions are organised with the Executive Management. These key times provide employees with the opportunity to question managers, to better understand the company's directions and to make their questions or suggestions heard. In addition, meetings are held every three months between Management and the management line. These meetings aim to ensure that the short-term strategy is implemented consistently, while enabling managers to become familiar with the key messages and to report feedback from the field.

In addition to these institutional arrangements, social dialogue is practised on a daily basis through regular team meetings during which information is exchanged, actions are coordinated and ideas are expressed. Individual reviews between managers and employees build on this momentum by facilitating close follow-up, personalised support and active listening to each individual's needs and expectations.

In this way, Sagemcom ensures that solid and transparent social dialogue is established at all levels of the organisation.

2.3 Indicators and targets related to social dialogue and collective bargaining agreements

	MEN	WOMEN	OTHER**	NOT RELEASED	TOTAL
Total number of employees on 31/12 (excluding "Other workers")	2827	2742	0	0	5569
Number of employees covered by collective bargaining agreements (excluding "Other workers")	2519	2620	0	0	5139

	2022	2023	2024
Total number of employees on 31/12 (excluding “Other workers”)	6051	5894	5569
Number of employees covered by collective bargaining agreements (excluding “Other workers”)	5585	5437	5139
Total percentage of employees covered by collective bargaining agreements	92.3%	92.2%	92.3%

3. Diversity and Inclusion (D&I)

3.1 Diversity and Inclusion Policy

Diversity is one of the fundamental principles set out in the “Sagemcom Global Policy on Working Conditions, Respect for Human Rights and Environmental Protection”. Sagemcom aims to ensure friendliness within teams, and encourage individual development and innovation, while ensuring respect for personal differences. Mixing together people with different backgrounds and experiences is an integral part of the Sagemcom Group’s culture. Whatever the country, the subsidiaries therefore aim to have their teams reflect the diversity of the societies in which they work.

The fifth pillar of Sagemcom’s mission reflects the Group’s commitment, making it possible to manage specific indicators, subject to regular third-party audits (see page 7 on Mission-Driven Company).

3.2 Actions and resources related to diversity and inclusion

3.2.1 Building on our cultural diversity

Sagemcom has nearly 6,500 employees in some 50 countries around the world, all with different cultures. The multiculturalism of the Group’s workforce is a real lever for the diversity of talents, innovation, cooperation and competitiveness upon which Sagemcom can capitalise. United around the Group’s common values, Sagemcom strives to continue to support its employees by setting up special training courses to pass on the keys for mutual understanding and the ways to optimise cooperation between members of multicultural teams.

Support for internationalisation is one of the priorities of the Group's skills development plan. Consequently, numerous employees have taken part in multicultural training courses, applied according to the main countries in which the Group operates (Brazil, China, France, Germany, Tunisia and Hungary). These specific training courses provide the keys for optimising collaboration between members of multicultural teams. When Sagemcom sets up operations in a new country, our employees (and their spouses, where appropriate) are also offered enhanced inter-cultural support. Such support was provided to the teams when operations were set up recently in Vietnam.

3.2.2 Nurturing and encouraging diversity

Sagemcom considers the diversity of its employees to be a source of innovation, enrichment and performance. For our employees, working in an environment that encourages diversity and inclusion allows everyone to realise their full potential while actively contributing to the Group's performance.

Diversity is one of the fundamental principles set out in the "Sagemcom Global Policy on Working Conditions, Respect for Human Rights and Environmental Protection". Sagemcom aims to ensure friendliness within teams, and encourage individual development and innovation, while ensuring respect for personal differences and a wide range of backgrounds and experiences. In each country, Sagemcom's subsidiaries strive to ensure that their teams reflect the diversity of the surrounding societies.

The fifth pillar of Sagemcom's mission reflects this commitment, making it possible to manage specific indicators, subject to regular third-party audits (see page 5 on Mission-Driven Company).

Over the past five years, over 100 employees have completed "intercultural" training. This policy reflects Sagemcom's desire to nurture and encourage diversity in all its aspects.

3.2.3 Professional equality

One of Sagemcom's main challenges in diversity is professional equality between men and women. In a traditionally masculine sector of activity, this involves making diversity a reality at every level of the company. Even though the rate of feminisation of the workforce continues to increase and now stands at 48%, it is essential that the share of women, especially in more technically advanced or managerial jobs, improves and balances with that of men.

Sagemcom's R&D centre in Tunisia is exemplary in this respect: it has nearly achieved equality (43% women), due in part to the large number of women recruited in 2024 (52% female recruitment).

To attract women with a technical or technological background to its French subsidiaries, Sagemcom has been a member of the partner association "Elles

Bougent” for several years. This association works on encouraging young women to pursue scientific studies, which are generally more popular with men. Alongside this association, Sagemcom also develops initiatives designed to attract more women to scientific professions, for example regularly highlighting portraits and role models of the Group’s female engineering employees in the Group’s various communication media, or during external meetings.

As well as being committed to promoting diversity, Sagemcom also has a duty to lead the way by guaranteeing equal pay for women and men. To this end, various measures are in place to prohibit situations of unequal pay. A point cloud compensation analysis is therefore carried out during external recruitment or internal mobility. In the event of an unjustified gap, a salary adjustment is made. In addition, maternity leave receives increased attention and is offset in order to ensure equal pay (minimum average increase, adjustment of targets for people with bonuses, etc.).

Sagemcom ensures that
solid and transparent
social dialogue is
established at all levels
of the organisation.

For its international subsidiaries, Sagemcom decided to progressively roll out the gender equality index, even though it is only a legal obligation in France. The index aims to prevent any wage gaps between women and men and adjust wage policy accordingly. This priority is one of the indicators monitored as part of the Group’s mission: in 2023, this indicator was deployed in our R&D subsidiary in Tunisia and in 2024 it was extended to China.

As it considers that professional equality between women and men is a vector for collective performance, Sagemcom has continued its measures for raising awareness designed to change the attitude and behaviour of all our male and female employees, students, trainers, partners, etc. In France, for example, to go further still and structure this initiative, Sagemcom has been covered for several years by a company agreement covering six areas of action geared to promoting diversity: the sustainable integration of diversity into the Group’s culture, access to employment, the compensation and equal pay policy, the career path, support to help disabled employees remain in employment, and the search for work-life balance.

This agreement, drawn up in cooperation with the Executive Management and union organisations, is not a new undertaking for Sagemcom.

Sagemcom's commitment already resulted in 2016 in the signing of independent agreements on the subjects of professional equality between men and women, the fight against discrimination, as well as the employment and integration of disabled people. A review of those agreements highlighted significant progress and the importance of sharing synergies to jointly take action on topics geared to a common cause: establishing diversity as one of the permanent core concerns.

Staying true to its values, Sagemcom openly asserted its commitment to supporting parents, based on the firmly held belief that happy parents make better employees who are more involved in and committed to their work. At the Tunisian plants, for example, women are given a bonus to make sure they suffer no loss of income during maternity leave. To let women know about this key measure, maternity preparation workshops are held at the industrial sites in Tunis. The day-long events are open to anyone interested. Various types of support are available, including advice about pregnancy, breast-feeding and low-impact sports, and how to join antenatal yoga classes. Because professional equality concerns both women and men, this support for parents also includes commitments undertaken by Sagemcom to support new fathers. From now on, head office employees will be entitled to take extended paternity leave without any loss of pay.

3.2.4 Fighting against all forms of discrimination

Sagemcom believes that a policy of promoting diversity must also help to prevent and fight against all forms of discrimination, to make diversity one of the levers of its performance. This policy includes the objectification of all human resource management processes (recruitment, compensation, training, career, etc.). It also involves promoting positive measures designed to ensure similar working and career conditions for all.

The Group has asserted its commitment to fighting against discrimination by being one of the first companies to join the organisation "À compétence égale". This organisation, which is engaged in the fight against all forms of discrimination in recruitment and career development, helps Sagemcom to audit recruitment tools and processes and to provide resources and tools, as part of a continuous improvement approach.

Sagemcom has also signed the "À compétence égale" charter, clearly confirming its commitment to combating all forms of discrimination in every stage of the recruitment process and throughout the careers of its employees. There are around thirty discrimination criteria, including discrimination based on gender, age, origin, sexual orientation and gender identity. For example, in the latter case, Sagemcom takes pride in promoting diversity and inclusiveness for all, including the LGBT+ population.

With support from "À compétence égale", Sagemcom drafted the guide entitled "Put your recruiter expertise to use to boost equal opportunities",

which makes it possible to decode discriminatory situations, too often ignored or played down, so that everyone can adopt appropriate behaviour. In 2024, Sagemcom continued to roll out its “Zero-discrimination recruitment” training, the completion of which is one of the Group’s mission indicators. Completing this course is now a mandatory pre-requisite for being involved in the recruitment process. Otherwise, employees will not be allowed to issue recruitment requests or be part of the recruitment process. After France in 2023, all those involved in recruitment processes in Hungary, the United States and Vietnam had to complete the “Zero-discrimination recruitment” training in 2024 to be able to participate in a recruitment process.

3.2.5 Age diversity as a performance factor

Age diversity within the Group is also a major issue. Depending on the jobs, the professional environments and the local contexts, our Group is characterised by great diversity in terms of age. While the average age at Sagemcom is 37, a quarter of our employees are 30 years old or younger. In addition, differences are observed among employees aged 60 and over: although this age group represents 2% of the Group’s overall workforce, it amounts to 10% within the workforce in France.

Particular attention must therefore be paid to the age pyramid, as well as to preparing for employment and generational changes. In this regard, numerous initiatives have been implemented over the past few years, particularly in collaboration with the educational sector, in order to recruit young staff. Between 2016 and 2024, the number of young staff (under 30 years old) in France grew significantly, from 9% to 23%.

However, the challenge will not be met to the detriment of older employees. Sagemcom intends to continue its policy of maintaining and developing the jobs of all of its employees. Under its Job and Career Management (GEPP) agreement, the Group affirms its commitment to keeping older people in the workforce through recruiting senior employees, internal transfers, training and other suitable measures.

3.2.6 Integrating people with disabilities and keeping them in the workforce

Integrating people with disabilities and keeping them in the workforce represents another major challenge for the Group. The difficulties in recruiting employees with disabilities with regard to ambitions and actions in this area reflect the lack of qualifications and professional training. Despite that, the Group is committed to doing everything it can to recruit all talent and support employees with special needs to the very best of its ability. In this respect, actions are being set up to support the inclusion and ongoing employment of people with a disability.

In France, the diversity agreement highlights the measures taken to foster the long-term integration of employees with a disability. It also provides for working conditions that support their career development and allow them to stay in work, the development of subcontracting with companies that employ people with a disability, and support for employees who take care of a close family member affected by disability. To illustrate those commitments, all the employment offers published in France mention “Sagemcom, a company that welcomes people with disabilities”, and it should also be noted that disabled employees have been kept in their jobs thanks to special conditions, alternating working from home and on site. Furthermore, paid days of absence are granted to employees with disabilities to carry out administrative procedures related to disability (in this respect, 20 days of paid absence were recorded in France in 2024).

3.2.7 Sparking vocations and supporting equal opportunities

A number of initiatives are taken at local level to build ties with both academic and professional communities. The goal is to foster diversity and equal opportunities and help improve the age mix within the Group. As an example, the Group has been supporting Article 1 for almost fifteen years, an association that supports the integration of young people from underprivileged backgrounds into the workplace. The Group is one of this association’s leading and long-standing partners. In 2024 in France, around fifteen volunteering employees committed to helping young people as part of different Article 1 programmes. Further evidence of this commitment can be seen in financial support to help the organisation roll out these actions.

The Group also got involved in the partnership with the association “Elles Bougent”, which began in 2020 and aims to promote scientific and technical courses among girls in secondary school and college. The Group is working to raise awareness amongst female high school students of scientific studies, because they are largely under-represented in the engineering school, which are renowned for attracting the best talents and promoting diversity.

The Tunisian subsidiaries also launched a range of initiatives in 2023 to help people in need. A social committee was created at the manufacturing sites. It was assigned a budget by management to help employees in need to cope with unforeseen events. The “200 cartables pour 200 écoliers” and “100 couffins pour 100 familles” charity campaign also raised funds to pay for school supplies and cots for underprivileged families. For about 10 years, the Tunisian R&D centre employees have shown great generosity in supporting this initiative in favour of equal opportunities. The head office also kicked off various similar initiatives. For example, it encouraged its employees to participate in the “Foulée du Cortex”, a race to raise funds for the Paris Brain Institute.

3.2.8 Indicators related to diversity and inclusion

Total number of employees by age and gender

		MEN	WOMEN	OTHER	NOT RELEASED	TOTAL
< 25 YEARS	2022	0	0	0	0	0
	2023	145	125	0	0	270
	2024	96	88	0	0	184
25 - 35 YEARS OLD	2022	0	0	0	0	0
	2023	1,012	1,596	0	0	2,608
	2024	877	1,398	0	0	2,275
36 - 45 YEARS OLD	2022	0	0	0	0	0
	2023	1,284	945	0	0	2,229
	2024	1,215	1,015	0	0	2,230
46 - 55 YEARS OLD	2022	0	0	0	0	0
	2023	383	158	0	0	541
	2024	450	186	0	0	636
56 - 65 YEARS OLD	2022	0	0	0	0	0
	2023	192	49	0	0	241
	2024	181	51	0	0	232
MORE THAN 65 YEARS	2022	0	0	0	0	0
	2023	4	3	0	0	7
	2024	11	1	0	0	12
TOTAL	2022	0	0	0	0	0
	2023	3,020	2,876	0	0	5,896
	2024	2,830	2,739	0	0	5,569

Breakdown of the percentage of total new recruits by gender

	MEN	WOMEN	OTHER	NOT RELEASED
2022	60%	40%	0	0
2023	54%	46	0	0
2024	48%	52	0	0

Breakdown of new recruits by region

	Breakdown of the total number of new recruits by region		
	2022	2023	2024
Europe	0	121	90
Africa and Middle East	527	472	291
Americas	37	59	13
Asia and Oceania	30	13	3
TOTAL	594	665	397

Breakdown of total new recruits by age and gender

		MEN	WOMEN	OTHER	NOT RELEASED	TOTAL
< 25 YEARS	2022	91	66	0	0	157
	2023	64	33	0	0	97
	2024	24	17	0	0	41
25 - 35 YEARS OLD	2022	289	199	0	0	488
	2023	214	232	0	0	446
	2024	114	151	0	0	265
36 - 45 YEARS OLD	2022	65	29	0	0	94
	2023	70	34	0	0	104
	2024	41	34	0	0	75
46 - 55 YEARS OLD	2022	15	6	0	0	21
	2023	13	5	0	0	18
	2024	10	4	0	0	14
56 - 65 YEARS OLD	2022	1	3	0	0	4
	2023	0	0	0	0	0
	2024	0	1	0	0	1
MORE THAN 65 YEARS	2022	0	0	0	0	0
	2023	0	0	0	0	0
	2024	1	0	0	0	1
TOTAL	2022	461	303	0	0	764
	2023	361	304	0	0	665
	2024	190	207	0	0	397

Percentage of senior management hired from the local community

indicator 202-2 proportion of senior management hired from the local community		existence of a policy to favour the recruitment of local employees	total number of senior managers in the entity	number of local senior managers in the entity	% of senior management hired from the local community
France	2022	yes	12	12	100%
	2023		17	17	100%
	2024		17	17	100%
Brazil	2022	yes	4	4	100%
	2023		5	5	100%
	2024		5	5	100%
China	2022	yes	3	2	67%
	2023		1	1	100%
	2024		1	1	100%
Fröschl	2022	yes	2	2	100%
	2023		1	1	100%
	2024		1	1	100%
Dr Neuhaus	2022	yes	5	5	100%
	2023		4	4	100%
	2024		4	4	100%
Hungary	2022	yes	4	4	100%
	2023		1	1	100%
	2024		1	1	100%
Italy	2022	yes	2	2	100%
	2023		1	1	100%
	2024		1	1	100%
Tunisia SST	2022	yes	8	7	88%
	2023		12	11	92%
	2024		8	7	88%
Tunisia STC	2022	yes	14	10	71%
	2023		11	7	64%
	2024		10	7	70%
USA LLC	2022	yes	3	0	0%
	2023		3	0	0%
	2024		4	0	0%

Pillar 5 - 2024 mission-driven company indicators

Operational targets	Indicators	2024	Trajectory
Promote professional development	Percentage of EIDPs analysed and used	EIDPs completed: 98% EIDPs analysed: 100% EIDPs used: 97%	100% EIDPs completed, analysed and used by 2025
	Gender equal pay	France: 92.5% (based on the index according to the compensation criterion only) R&D Tunisia: 95% China: 77.5%	2025: Tunisian industrial sites
Promote diversity and equal opportunities within a committed community	Number of solidarity and/or unifying events supported by the Group	15 events held	20 events/year by 2025
	Percentage of staff involved in the recruitment process who have completed "Zero-discrimination recruitment" training (France: managers/employees; Abroad: managers)	France: 100% Hungary: 100% USA: 100% Vietnam: 100%	2025: Tunisia

4. Compensation, welfare benefits and decent wages

4.1 Policies related to compensation, welfare benefits and decent wages

The Sagemcom Group's compensation and welfare benefits policy is based on respect for human rights and the regulations in force. The company is firmly committed to fighting all forms of discrimination and promoting pay equity. Salaries are in line with international and local laws and conventions, while adhering to ethical standards.

In concrete terms, every year, all of our subsidiaries receive a salary increase budget that is specific to each of them. These salary increase budgets are built and determined using local benchmarks with regard to our activities and professions and are systematically higher than inflation forecasts and regulatory and/or contractual changes planned and/or applicable in this area.

These salary increase budgets are further broken down into an annual salary policy (increase in basic salaries) subject to:

- either negotiations (mandatory annual negotiations) and local agreements between management and the staff representatives and/or trade unions concerned, agreements that currently cover more than 80% of the Group's employees
- or, by default, a unilateral decision by the Group Human Resources Department.

4.2 Action related to compensation, welfare benefits and decent wages

4.2.1 Health insurance cover with majority funding by Sagemcom

As part of its commitments as a mission-driven company, Sagemcom has set itself the goal of providing 100% of its employees with health insurance cover, including majority funding by the company. This is a major commitment and an ambitious objective, but a successful gamble, because, since 2024, the rate of employees worldwide covered by health insurance, mainly funded by Sagemcom, has reached 98%. For example, the teams installed at the beginning of 2024 in the new production site in Vietnam were immediately eligible for social security cover guaranteeing access to high-quality healthcare and a health check as well, paid for by Sagemcom.

4.3 Indicators related to compensation, welfare benefits and decent wages

4.3.1 Ratio of standard entry level wage by gender compared to local minimum wage - GRI indicator 202-1

PERMANENT EMPLOYEES		MEN	WOMEN	OTHER	NOT RELEASED
Sagemcom Campus BLB	2022	108%	108%	0%	0%
	2023	108%	108%	0%	0%
	2024	120%	120%	0%	0%
Sagemcom Tunisie STC	2022	145%	145%	0%	0%
	2023	165%	165%	0%	0%
	2024	154%	154%	0%	0%
Sagemcom Multi Energy Services	2022	100%	100%	0%	0%
	2023	100%	100%	0%	0%
	2024	101%	101%	0%	0%
Sagemcom Communicacoes Ltda	2022	148%	148%	0%	0%
	2023	155%	155%	0%	0%
	2024	156%	156%	0%	0%
Sagemcom (Tianjin) Co. Ltd + Sagemcom Electronic (Beijing) Co.Ltd	2022	227%	214%	0%	0%
	2023	246%	242%	0%	0%
	2024	249%	275%	0%	0%
Sagemcom Froschl	2022	120%	100%	0%	0%
	2023	151%	100%	0%	0%
	2024	152%	100%	0%	0%
Sagemcom Dr Neuhaus	2022	110%	100%	0%	0%
	2023	113%	100%	0%	0%
	2024	117%	102%	0%	0%
Sagemcom Magyarország Elektronikai Kft	2022	181%	142%	0%	0%
	2023	158%	137%	0%	0%
	2024	153%	148%	0%	0%
Sagemcom Italia Spa	2022	100%	100%	0%	0%
	2023	100%	100%	0%	0%
	2024	100%	100%	0%	0%
Sagemcom Tunisie SST	2022	132%	132%	0%	0%
	2023	141%	141%	0%	0%
	2024	141%	141%	0%	0%
Sagemcom USA LLC	2022	0%	0%	0%	0%
	2023	509%	718%	0%	0%
	2024	483%	682%	0%	0%

TEMPORARY EMPLOYEES		MEN	WOMEN	OTHER	NOT RELEASED
Sagemcom Campus BLB	2022	0%	0%	0%	0%
	2023	108%	108%	0%	0%
	2024	120%	120%	0%	0%
Sagemcom Tunisie STC	2022	0%	0%	0%	0%
	2023	165%	165%	0%	0%
	2024	154%	154%	0%	0%
Sagemcom Multi Energy Services	2022	0%	0%	0%	0%
	2023	102%	102%	0%	0%
	2024	0%	0%	0%	0%
Sagemcom Communicacoes Ltda	2022	0%	0%	0%	0%
	2023	155%	155%	0%	0%
	2024	156%	156%	0%	0%
Sagemcom (Tianjin) Co. Ltd + Sagemcom Electronic (Beijing) Co.Ltd	2022	0%	0%	0%	0%
	2023	0%	0%	0%	0%
	2024	0%	0%	0%	0%
Sagemcom Froschl	2022	0%	0%	0%	0%
	2023	0%	0%	0%	0%
	2024	0%	0%	0%	0%
Sagemcom Dr Neuhaus	2022	0%	0%	0%	0%
	2023	113%	113%	0%	0%
	2024	0%	0%	0%	0%
Sagemcom Magyarország Elektronikai Kft	2022	0%	0%	0%	0%
	2023	0%	0%	0%	0%
	2024	0%	0%	0%	0%
Sagemcom Italia Spa	2022	100%	100%	0%	0%
	2023	100%	100%	0%	0%
	2024	100%	100%	0%	0%
Sagemcom Tunisie SST	2022	0%	0%	0%	0%
	2023	0%	0%	0%	0%
	2024	141%	141%	0%	0%
Sagemcom USA LLC	2022	0%	0%	0%	0%
	2023	0%	0%	0%	0%
	2024	0%	0%	0%	0%

5. Health, safety and quality of life at work

5.1 Health, safety and quality of life at work policy

The Group has a proactive policy aimed at guaranteeing the physical and mental integrity as well as the health of those present on its sites. This initiative is part of a desire to promote a working environment conducive to quality of life while protecting health and maintaining productivity, and is in line with international standards (ISO 9001, 14001 and 45001) which are used as a reference for environmental and health and safety management within the Group.

The Group's primary objective is to eliminate hazards and reduce the risks associated with occupational diseases, serious accidents and frequent incidents. This commitment is based on a clear aim: to achieve the goal of "zero accidents" each year. Although this target is a significant challenge, it is considered essential in the context of the Group's values. This fundamental principle is therefore enshrined in the Group's articles of association, through its mission-driven company status, and in the "Sagemcom Global Policy on Working Conditions, Respect for Human Rights and Environmental Protection", which governs Sagemcom's commitments.

These initiatives are implemented in particular through the preventive and training measures that have been launched, which take into account the health and safety of employees, whatever their activity or working environment. To carry out these measures, the Group Human Resources Department is at the helm, relying on the Health and Safety teams that report directly to it and that act with a single objective: to maintain a common culture that promotes health and safety for all.

5.2 Actions and resources related to health, safety and quality of life at work

5.2.1 Workplace safety measures

Employee safety is systematically analysed for each business line. This risk analysis is reviewed annually or when changes are made to activities or processes, and makes it possible to anticipate potentially hazardous situations and put in place preventive and protective measures, both individual and collective. Areas of vigilance include fire safety, protection against electrical hazards and exposure to chemicals or noise pollution. Various procedures have been put in place to effectively manage the risks incurred by employees. These procedures include:

- risk assessment
- compliance with legal requirements
- approval of protective equipment
- recording of accidents and incidents

- implementation of preventive and corrective actions
- awareness-raising/informing employees
- management of hazardous substances.

Employees receive continuous safety training from the moment they join and throughout their professional career. For example, at the Tunisian R&D centre, safety awareness days are regularly organised to address essential topics such as fire drills, the use of personal protective equipment and First Aid. At the African subsidiaries, certified health and safety training (IOSH) has been offered to anticipate the risks specific to local activities.

As part of its commitment as a mission-driven company, and in addition to the compulsory regulatory training that covers all exposed personnel, in 2024, Sagemcom provided 83% of its teams with specific preventive training on safety, and carried out at least 5 safety-related actions for 98% of its teams, including:

- **introduction of safety staff/ecosystem** (safety officers, prevention officers, close links with occupational health, etc.)
- **preventive actions** (“ergonomics” project, wearing of PPE, display of high-risk areas, traffic routes in the workshops, etc.)
- **training and awareness-raising** (electrical installations and interventions = maintenance team, storing and moving materials = logistics team, handling chemicals = cleaning team, ergonomics = Safety and Engineering team, etc.)
- **“safety” management and monitoring** (accidents at work, dashboards, etc.).

5.2.2 Prevention and healthcare support

The Group also pays particular attention to the health of its employees by deploying prevention initiatives.

These initiatives aim in particular to prevent musculoskeletal disorders (MSDs) through the implementation of ergonomic measures in the design of tools and workspaces, as well as the organisation of awareness-raising workshops on various health topics.

For example, on some sites, the first few minutes of the day are devoted to flexibility exercises to reduce the risk of MSDs, with sessions regularly organised at the Shenzhen sites or at Sagemcom’s industrial sites in Taden or Tunis.

Sagemcom does not intend to limit its commitment to safety, but wishes to commit to health as well by deploying a prevention initiative. Accordingly, within the Tunisian research and development teams, an extended medical service, composed of a registered doctor, an occupational doctor, a physiotherapist and health and hygiene officers, is available to everyone, every day of the week.. Information campaigns, such as “Pink October”, have also been carried out to raise awareness among employees of the

risks of serious diseases and encourage healthy lifestyles.

At the R&D sites in Tunisia, awareness-raising workshops are regularly organised on various health-related topics, including the benefits of not smoking, breast cancer prevention and screening, awareness of MSDs, eating a balanced diet, gut health, and more.

With a view to strengthening health prevention, the Group continued to implement action plans in 2024 along several lines:

- develop preventive and ergonomic procedures in the design of new tools and premises or the preparation before taking over a workstation and thus reducing the risks including the onset of musculoskeletal disorders (MSD)
 - an e-learning module adapted to the Group's activities has been introduced to prevent the onset of MSDs, for example by addressing work on screens or handling operations
 - under the coordination of Occupational Health dedicated to the Tunisian plants, in-depth studies were carried out on workstation ergonomics, both from the perspective of their design, integrated from the creation of positions and work tools, in compliance with safety and sizing standards, and from a remedial perspective, based on risk assessments, conducted in collaboration with the operational teams. These studies were then shared in a multi-disciplinary committee, bringing together the Health, HR, Working Methods, Safety, Production, Manufacturing and Continuous Improvement Departments: they have resulted in the reorganisation of workstations and the automation of certain tasks, particularly those presenting a high risk of musculoskeletal disorders (MSD)
- involve occupational health and occupational health services, beyond medical surveillance, by providing advice designed to have employees participate in the process of preventing occupational risks (difficult working conditions, ergonomic workstations, travel, etc.), but more generally to encourage employees to adopt healthy lifestyles. This advice is given either individually or during collective information and awareness sessions as part of information campaigns or visits to workshops, offices, or even during organising information and prevention campaigns. Several other actions were taken on the various Tunisian sites, such as screening for diabetes and high blood pressure, and awareness-raising campaigns on subjects such as breastfeeding.

In order to minimise the risks, personal protection equipment is made available to everyone, in order to supplement the collective preventive actions. In addition, employees also help draw up safety instructions: this is essential to ensure that the measures and associated equipment (gloves, goggles, earplugs, harnesses, safety shoes, etc.) are compatible with their daily lives. In addition, management makes sure that safety instructions and recommended methods are applied.

Sagemcom also takes into account the technological developments affecting its production tools (for example the integration of automated lines) in the

mapping and management of new risks. Safety analyses in every situation (including maintenance and waste management) are carried out, and specific rules are laid down. They are complemented by operator training sessions, and, of course, by the provision of suitable equipment. Tests are carried out annually or more frequently, depending on their impacts, and the results of these tests are reported each month by local management. An overview is held midyear to verify that the actual results are in line with the objectives. Corrective measures are set up if this is not the case and the results are analysed by the Executive Management.

Finally, in addition to the measures taken for production, processes have also been set up for teams handling electrical or gas products, as well as those containing Lithium batteries: as a result, even without certification, the same rules are applied to them. For example, every employee who works near an electrical product or machine must take training to become a qualified electrical worker. At the end of this training, and subject to passing the final exam, an electrical qualification certificate is then given. Dedicated safety systems for electric shocks, fires and explosions have also been installed in the laboratories, and in all the Group's entities, a QHSE (Quality, Health, Safety and Environment) officer has been appointed to oversee employee health and safety. For example, a coherent QHSE initiative has been defined and deployed under the supervision of an Africa QHSE officer in all our African subsidiaries, excluding Tunisia. This initiative is part of Sagemcom's ambitious health, safety and environmental policy that is intended to provide our employees with the best possible working conditions while meeting our customers' expectations.

5.2.3 Quality of life at work

The Group implements initiatives to improve the quality of life at work by modernising workspaces and promoting a better work-life balance. In 2024, the move to new premises in China, the United States and Bois-Colombes made it possible to offer tailored environments, conducive to collaboration and the well-being of employees.

The workstations are ergonomically designed with adjustable equipment, adapted in agreement with the Occupational Health Department, which can suggest personalised adjustments to suit individual morphologies.

In France, a "Job and Career Management" agreement was signed in 2024 by the Management with staff representatives, making the fight against sedentary lifestyles a priority. Poster campaigns, collective awareness-raising and a dedicated space on the Intranet provide everyone with the information they need to be proactive about their health, in addition to the measures undertaken by the Management.

Finally, mechanisms are in place to identify and resolve problems related to work-life balance. This proactive approach is based on employee feedback, analysed by the human resources teams, in order to define practical measures to improve working conditions in the long term. Consequently, the work-life balance difficulties, as expressed during the Individual Development and

Performance Reviews (EIDP), are systematically analysed and thoroughly addressed by the human resources teams, who carry out an in-depth study of the situations mentioned. The aim is to identify, in a targeted manner, the relevant levers of action and to define concrete action plans, tailored to the identified needs. This proactive approach aims to provide long-term responses to the problems encountered, with a view to continuously improving working conditions and, more broadly, the quality of life at work.

In 2024, 98% of EIDPs were completed, 100% were analysed, and 97% were circled back, for a 2025 trajectory of 100% of EIDPs analysed and circled back (see paragraph on “Managing and supporting performance, development and progress”).

It should be noted that, in 2024, 98% of the Group’s employees were covered by an action plan promoting quality of life at work, in accordance with the commitments made as a mission-driven company: this means that 98% of the Group’s employees are covered by at least two actions incorporated into a “Quality of life at work” action plan:

- analysis and addressing of work-life balance difficulties expressed in EIDPs
- agreement or action plan supporting QLW (work-life balance, remote working, prevention of psychosocial risks, right to disconnect, etc.)
- “ergonomics” projects in plants in particular (ergonomics and working conditions project in Tunisia, exoskeleton at MEI, etc.)
- others: new working environments (Bois-Colombes, USA, China, etc.), tracking of long working hours to prevent work-life balance difficulties, break room in some subsidiaries, etc.

5.3 Indicators related to health, safety and quality of life at work

Number and rate of fatalities

	Employees			Other workers		
	2022	2023	2024	2022	2023	2024
Group number	0	0	0	0	0	0
Group rate	0.000	0.000	0.000	0.000	0.000	0.000

Number and rate of accidents at work with serious consequences (excluding fatalities)

	Employees			Other workers		
	2022	2023	2024	2022	2023	2024
Group number	0	0	0	0	0	0
Group rate	0.000	0.000	0.000	0.000	0.000	0.000

Number and rate of recordable accidents at work

	Employees			Other workers		
	2022	2023	2024	2022	2023	2024
Group number		255	50		15	18
Group rate		22.757	5.011		18.853	50.556

Number of hours worked

	Employees			Other workers		
	2022	2023	2024	2022	2023	2024
Group total	12,321,188.62	11,205,532.82	9,979,002.46	328,800.00	795,647.53	356,043.00

Severity rate

	Employees + Other workers		
	TG 2022	TG 2023	TG 2024
France Bécon Les Bruyères	0.242	0.273	0.081
Tunisia STC	0.043	0.024	0.011
France MEI	1.583	0.020	0.088
Brazil	0.000	0.000	0.000
China	0.000	0.000	0.000
Froschl	0.000	0.289	0.000
Dr Neuhaus	0.000	0.000	0.206
Hungary	0.000	0.000	0.000
Italy	0.345	0.020	0.233
Tunisia SST	0.029	0.007	0.014
USA LLC	0.000	0.000	0.000
Total for Sagemcom	0.086	0.049	0.024

Frequency rate

	Employees + Other workers		
	TG 2022	TG 2023	TG 2024
France Bécon Les Bruyères	0.741	0.000	0.832
Tunisia STC	3.360	2.913	1.300
France MEI	17.990	13.172	13.561
Brazil	0.000	0.000	0.000
China	0.000	0.000	0.000
Froschl	0.000	13.782	0.000
Dr Neuhaus	0.000	0.000	68.559
Hungary	0.000	0.000	0.000
Italy	17.094	3.942	17.438
Tunisia SST	4.026	3.495	3.499
USA LLC	0.000	0.000	0.000
Total for Sagemcom	3.399	2.666	2.032

Pillar 4 - 2024 mission-driven company indicators

Operational targets	Indicators	2024	Trajectory
Provide health insurance cover for 100% of our employees, with majority funding by the company	Percentage of employees covered by health insurance	98%* in 2024 (vs 89% in 2023)	
Adopt the best practices in terms of the safety of our employees	Percentage of employees covered by a safety action plan	98% in 2024	100% in 2025
	Percentage of employees trained in safety on GIS perimeters	89% of employees trained in safety on the International GIS perimeter: • Regulatory training: 100% • Preventive training: 83%	
Adopt the best practices to improve the well-being of our employees at work	Percentage of employees covered by a quality of life at work action plan	100% of employees covered by an action plan promoting quality of life at work within the scope defined in the trajectory (96% within the Group's scope)	2025: maintain at least 96%

6. Procedures for remedying adverse impacts and channels for the company's workers to raise concerns and cases, complaints and impacts on human rights

The Group establishes accessible and effective mechanisms to identify, address and remedy potential or actual adverse impacts on human rights and working conditions. These procedures are part of our global Sustainability and Human Rights Policy.

Several channels are available to all employees, regardless of their position or geographical location, to freely express any concerns related to respect for human rights or ethics:

- HR officers on each site or subsidiary, specially trained in the ethical management of reports
- the Whispli platform, a secure tool guaranteeing anonymous reporting when legally permitted
- a dedicated email address: ethics@sagemcom.com
- the Compliance Committee, which guarantees the independent, impartial and confidential handling of reports.

These systems make it possible to report any type of incident, particularly regarding harassment, discrimination, inappropriate working conditions or any violation of basic rights.

6.1 Handling of reports


All reports are handled in a structured and confidential manner. The process is as follows:

- the report is recorded and able to be traced in a secure tool, guaranteeing data protection and the confidentiality of the information transmitted
- an initial analysis is conducted by a specialised unit that includes representatives from Human Resources and Compliance, in order to assess the nature and seriousness of the facts
- remedial, proportionate and appropriate measures are implemented, when the facts are proven (for example, awareness-raising actions, organisational adjustments, mediation or disciplinary actions)
- individualised follow-up is provided and communication is made with the person who submitted the report (when identified), in strict compliance with confidentiality and protection against any form of reprisals.

6.2 2024 data – Reporting indicators

In 2024, the Group received a total of 3 reports relating to human rights, including 3 cases of moral or sexual harassment.

None of the cases resulted in legal proceedings or administrative sanctions from the authorities.



Workers in the value chain

1. Policies related to workers in the value chain

Sagemcom's policy regarding workers in its value chain is governed by the Group's Purchasing policy, and is reflected in particular in the commitments described in the Sagemcom "Ethical Charter", which is a mandatory prerequisite for any business relationship with the Group.

It is indeed essential for Sagemcom to be able to rely on a responsible supply chain. As a committed player in this respect for many years, this conviction has emerged as central in building Sagemcom's mission, since one of the Group's 5 goals specifically addresses its value chain.

2. Actions and resources related to significant impacts on workers in the value chain

2.1 Signing of the Ethical Charter

Sagemcom has established an "Ethical Charter", which each of the Group's suppliers is required to sign. This charter is based, among others, on the international labour conventions of the International Labour Organisation (ILO), the Universal Declaration of Human Rights, the UN Convention on the Rights of the Child and the Responsible Business Alliance Code of Conduct. It is based on 11 key principles:

The prohibition of child labour under the legal age in force in the country, unless authorised by the ILO.	The prohibition of all forms of compulsory or forced labour.
Elimination of all forms of labour that, by their nature or conditions, represent an immediate danger or could compromise health and safety.	The promotion and respect of the protection of human rights recognised on an international scale.
Respect for the freedom of association and the effective recognition of the right to collective bargaining.	Refusal of any complicity in violations of human rights.
The application of a precautionary approach to problems affecting the environment.	Favouring the development and spread of environmentally friendly technologies.
Initiatives that promote increased responsibility with regard to the environment.	The elimination of all forms of employment or professional discrimination.
	Acting against all forms of corruption, including extortion and bribery.

By signing this charter, suppliers agree to promote and respect the above principles, and to encourage their own subcontractors and suppliers to do likewise.

The Ethical Charter favours even greater transparency between Sagemcom and its suppliers by explaining the conditions of audits that will be carried out on the supplier's premises. Suppliers must agree to accept audits in accordance with the Ethical Charter.

One of the first milestones in Sagemcom's ethical approach was 100% of existing suppliers signing the Ethical Charter, thereby ensuring a common set of principles to be respected. Since 2023, this charter has been made mandatory for all new suppliers wishing to work with Sagemcom. In 2024, efforts were continued to strengthen the social and environmental responsibility of the entire supply chain and achieve 100% coverage of Group suppliers who have signed this Ethical Charter.

It should be noted that in 2024, the Group's Mission Committee was asked to record the criteria for excluding certain kinds of suppliers from this obligation, a decision accepted because the kinds of suppliers in question were marginal either in terms of the volume of business they represent for the Group or their sphere of activity (for example, hotels, trade fair space hire, energy suppliers, etc.)

2.2 On-site audits

Sagemcom's initiative for achieving 100% of committed and responsible partners by 2030 consists of three stages:

- firstly, ensure that all the Group's suppliers of components and finished products have signed the Ethical Charter. Accordingly, by the end of 2024, 99.4% of the suppliers concerned had signed this charter
- at the same time, in 2023, 100% of critical suppliers were audited in order to define a starting rating for their maturity regarding ethical issues
- thirdly, corrective actions and sanctions are put in place for suppliers whose audit results are not compliant.

In 2024, 195 audits of suppliers were conducted, compared to 144 in 2023, to ensure their compliance with the ethical principles expected by Sagemcom. This initiative has borne fruit, with an increase in the number of suppliers obtaining the best ratings (A/B), proof that Sagemcom's support measures contribute to tangible improvements in its partners' ethical standards. In 2024, 62% of audited suppliers were rated A or B, well above the target of 20% initially set for 2024, with a trajectory of 100% in 2030. The intermediate trajectories will therefore be reviewed by the mission committee in 2025.

Finally, it should be noted that in 2024, three Sagemcom suppliers were excluded from the portfolio for non-compliance with ethical requirements or lack of satisfactory progress in their situation between two audits.

2.3 Regular training of internal teams

Training courses are regularly organised to assist the Group's teams in the roll-out of the ethical and environmental policy within the supply chain. Each new entrant who comes into contact with this chain participates in a training day jointly organised by the Purchasing Department and the CSR Department.

The annual "Supplier Days", attended by all the Group's suppliers as well as the purchasing teams, also provide an opportunity to share with all of Sagemcom's Tier 1 suppliers the Group's requirements, challenges and ethical and environmental goals with which the supply chain must comply.

It should be noted that in 2024, the Sagemcom Group's purchasing teams received "Climate Fresk" training.

2.4 Reporting systems

A secure and confidential reporting system is available to all stakeholders, whether internal or external to the Group. It includes a Whispli platform, accessible from the Group's website, and a dedicated email address:

- ethics@sagemcom.com.

Users can use this system to exercise their right to whistleblow, anonymously if they wish (in compliance with local regulations), without fear of reprisal.

Each report is dealt with carefully and in a traceable and confidential manner. An initial assessment is quickly undertaken to assess the seriousness and admissibility of the case. If necessary, an in-depth investigation is conducted, which may lead to the implementation of appropriate corrective measures, in particular in the event of a proven impact on employees, consumers or any other affected party.

This secure system provides full traceability, allowing cases dealt with to be tracked and archived. An aggregated analysis of the reports is also carried out periodically in order to identify any recurring trends and to implement preventive or continuous improvement measures.

In 2024, four reports were received, three via the Whispli platform and one via an ethics officer. All were examined and one resulted in a thorough investigation followed by appropriate corrective actions.

3. Indicators and targets related to workers in the value chain

Pillar 3 - 2024 mission-driven company indicators

Operational targets	Indicators	2024	Trajectory
Achieve a net zero supply chain by 2040 (as defined by the SBTi)	Percentage of portfolio suppliers with a 2040 low-carbon strategy	2% suppliers with a 2040 low-carbon strategy	Be Net zero in 2040
	Percentage of supplier responses on carbon scopes	71% supplier responses on carbon scopes	
	Percentage of supplier responses on component impacts	Process formalised in 2025 for launch in 2026.	
100% of our partners committed and responsible by 2030	Percentage of production suppliers committed by signing the Ethical Charter	100% of our suppliers, except exclusions approved by the Mission Committee	100%, to be maintained over time
	Percentage of Audit Coverage per portfolio	100%	100%, to be maintained over time
	Percentage of Responsible Suppliers (CSR A or B audits) vs Volume of audited Suppliers	195 audits conducted in 2024, 62% of suppliers audited A or B, 3 suppliers excluded from the portfolio	20% of suppliers audited A or B in 2024, 100% in 2030. The intermediate trajectory will be reviewed in 2025.



Consumers



1. Consumer policies

The Sagemcom Group is fully committed to guaranteeing the safety, health and protection of consumers and end users, based on rigorous international standards and stringent internal policies. This initiative is part of a global vision of social and environmental responsibility, aimed at offering products and services that comply with the highest standards, regardless of the regions where they are distributed.

By integrating consumer protection, environmental impact reduction, cybersecurity and ethical governance, Sagemcom contributes cross-functionally to several sustainable development goals of the United Nations Global Compact, in particular SDGs 3, 9, 12, 13 and 16, consolidating its positive impact on society.



1.1 Ethical governance and quality policy

All these measures are part of a global ethical policy, supported by a Group safety policy and quality policy that define clear requirements for all subsidiaries and partners. This governance ensures that the commitments made to consumers and end users are consistent and transparent, while contributing to the sustainability of the Group's activities.

In this way, Sagemcom ensures that each product and service meets the highest standards of safety, quality and responsibility, boosting user

confidence and consolidating its role as a player committed to sustainable and safe consumption.

2. Actions and resources related to significant impacts on consumers

2.1 Regulatory compliance and environmental management

Sagemcom strictly adheres to the main European and international regulations, such as RoHS (Restriction of Hazardous Substances) and REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals), thus ensuring limited use of hazardous substances in its products. The Group also deploys ISO 9001-, ISO 14001- and ISO 45001-certified environmental management systems, ensuring continuous improvement in quality, safety and environmental performance.

In order to preserve natural resources and minimise its environmental footprint, Sagemcom uses integrated Quality Management System (QMS) tools, allowing it to monitor and optimise its industrial processes while reducing the impact on the environment and human health.

2.2 Protection of consumer health and safety

Consumer protection is a key pillar of the Group's strategy. Sagemcom applies the highest product safety standards without compromise, even in countries where local regulatory requirements are lower than those of the European Union. This approach ensures consistent quality and safety across all markets, giving end users a high level of confidence in the solutions offered.

The Group implements rigorous testing, regular audits and quality controls at every stage of the product life cycle, ensuring the prevention of health and safety risks.

2.3 Cybersecurity

In a context of constantly evolving digital threats, Sagemcom deploys a proactive approach to cybersecurity. This approach is designed not only to protect its internal infrastructure, but also to guarantee that the products and solutions made available to its customers are secure, by limiting the risks associated with computer attacks.

The Group has ISO 27001 certification, the international reference standard for information systems security, and is supported by governance organised around an Information Security Management Centre (ISMC).

Sagemcom also relies on a monitoring system for its digital infrastructure

based on advanced detection tools (SIEM, EDR) and the involvement of expert teams. These teams include complementary profiles from the IT Department (DSI) and the Information Systems Security Department (DSSI), in coordination with a network of Experts working at the Group's various sites.

Since 2021, the Group has also put together a CSIRT (Computer Security Incident Response Team), which has been attached to interCERT-FR since 2022.

This team manages safety aspects through:

- the SPSL (Secure Product Security Lab), which prioritises the security of the products/solutions sold to our customers
- members of the Information Systems Security Department, with priority given to the security of our infrastructure and data
- IT operational teams and the SOC (Security Operation Centre), which handle security alerts on a daily basis and are able to respond around the clock, 24/7.

This organisation makes it possible to identify and deal with incidents quickly, limit their effects and ensure traceability of the actions carried out. It therefore contributes to controlling risks to the Group's products and services, in particular those likely to compromise the digital security of users.

Finally, a PIMS (Privacy Information Management System) completes this system, ensuring compliance in terms of personal data protection, in line with the Group's Information Security Management System.

2.4 Protection of personal data

Sagemcom follows a strict personal data protection policy, led by a Data Protection Officer (DPO), appointed in February 2018, guaranteeing compliance with regulations such as the GDPR, and available on [sagemcom.com](https://www.sagemcom.com).

This policy advocates compliance with the principles of lawfulness, fairness and transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality, accountability, protection by design and by default, and the rights of individuals, as derived from the GDPR. These principles apply to all Sagemcom subsidiaries around the world. Training and awareness-raising are regularly conducted within the Group. In 2024, an e-learning course on personal data protection was rolled out to all Group employees.

Sagemcom's commitment does not stop at its employees: data processing documentation is requested from all suppliers, customers and subsidiaries. And since 2023, the Group has seen its corporate activities receive ISO 27701 certification with extension of the scope to R&D.

Information on business conduct

1. Policies related to business conduct and prevention and detection of corruption and bribery

Sagemcom has a zero-tolerance policy towards any form of corruption, whether active or passive, direct or indirect. This fundamental commitment aims to ensure that business is conducted with integrity, fairness and transparency in each one of its activities.

Since joining the United Nations Global Compact in 2011, the Group has publicly affirmed its commitment to an ethical approach, based on compliance with national and international regulations on both the fight against corruption and on all compliance issues, based on best practices in the industry.

In accordance with the principles of the United Nations Global Compact, Sagemcom is committed to:

- deploying its ethical practices both internally and with its partners
- combating corruption, money laundering and the funding of terrorism
- strengthening the traceability of minerals originating from conflict zones in its supply chains.

These commitments are reflected in a Group policy entitled “Sagemcom Global Policy on Working Conditions, Respect for Human Rights and Environmental Protection”, setting out the “Compliance and Ethics” framework in which the Group operates. Sagemcom is therefore committed to developing its activities through its employees and partners in a transparent, fair and honest way.

This policy applies to all of the Group's employees, managers, business partners and suppliers, regardless of their hierarchical level or the geographical area where they operate. It includes:

- a strict ban on offering, promising, giving or accepting an undue advantage of any kind with a view to obtaining or maintaining a contract, or influencing a decision
- strict compliance with applicable anti-corruption laws, including those governing relations with public authorities
- the extension of ethical requirements to the entire supply chain, represented by an Ethical Charter for suppliers in place since 2007.

This policy is a benchmark for all of the Group's stakeholders, as part of their daily commitment to exemplary business conduct.

To implement its policy on business conduct and the prevention and detection of corruption and bribery, Sagemcom deploys a set of concrete actions within a structured system:

- a corruption prevention guide, designed as an educational and operational tool. This guide details the main high-risk situations, offers

concrete examples and provides practical recommendations. It aims to raise employee awareness of the various forms that corruption can take, including extraterritorial risks linked to certain foreign legislation, and to develop their capacity for discernment

- a dedicated training programme, including:
 - an e-learning module that is mandatory for all employees
 - targeted in-person training sessions for the most exposed populations
 - a gradual roll-out in all the Group's entities outside France.
- a secure reporting system, accessible to all employees and stakeholders via:
 - the external whistleblowing platform Whisppli
 - a dedicated email address
 - the ability to directly contact a Group ethics officer or its local Human Resources Department.
- a supplier selection and audit process via an Ethical Charter, to ensure compliance with contractual ethical commitments
- centralised management and identified governance, provided by a dedicated department within the organisation. This ensures that measures are consistently applied and updated according to regulatory changes, and that any incidents or reports are followed up.

2. Actions and resources related to business conduct and prevention and detection of corruption and bribery

2.1 A commitment to compliance

Sagemcom is strongly committed to meeting regulatory requirements and promoting a culture of compliance and sound business ethics. The Group has taken strict measures as part of its compliance strategy to guarantee that all its operations abide by the laws and meet the regulations applicable to its activities.

This approach is supported by the "Compliance Committee", set up in 2023, which contributes to the strategic direction and the monitoring of compliance issues within the Group. This Committee is composed of members of the Administrative and Financial, Legal, and Human Resources Departments, as well as the CSR Department. It meets once a month, and addresses the entire scope covered in the realm of compliance, including:

- the prevention of corruption
- the prevention of all forms of fraud
- compliance with international sanctions
- compliance with the rules pertaining to fair trade
- prevention and management of conflicts of interest
- compliance with the rules pertaining to export controls

- the fight against corruption, money laundering and the funding of terrorism.

Ongoing processes for identifying and managing non-compliance risks, incorporating robust controls, are put in place, as well as ongoing training for Group employees before deploying best practices regarding compliance.

2.2 Internal compliance programme

Sagemcom has implemented a comprehensive internal compliance programme, covering every level of its organisation, in order to guarantee that its business practices are ethical and comply with regulations. This structure is topped by the “Code of Ethical Conduct & Compliance”, which sets forth the fundamental principles and values that every member of the company must uphold.

In addition to this Code of Conduct, detailed policies and procedures have also been drawn up for every key aspect of compliance. These documents define the specific standards that must be met within Sagemcom, through a coherent and uniform Group-wide application. Concise practical guides for each subject have also been drawn up, to make it easier to understand and implement these policies. These guides provide a clear overview of the key issues, the rules to be complied with and the persons to contact when in doubt, or whenever necessary. They are designed to be accessible to every employee, irrespective of their experience or their role in the company.

Finally, detailed practical guides have been drawn up for more complex subjects, or subjects that demand in-depth understanding. These documents are more than just simple directives, since they provide detailed explanations, practical examples and case studies that help guide Group employees through more complex or ambiguous situations. They have been drawn up by Sagemcom’s internal experts.

2.3 Prevention of corruption

The fight against corruption, and more generally for the integrity of economic life, cannot be led without the corporate sector. Furthermore, for several years now, Sagemcom has been committing itself to developing its activities through its employees and partners in a transparent, fair and honest way.

Sagemcom notably made this commitment when it joined the United Nations Global Compact in 2011. By its international presence, the Group is naturally vulnerable to the risk of corruption, and contrary to popular belief, this risk exists in all countries, regardless of their geographical, economic or political situation. Aside from the regulations for establishing a legal framework at national and international level, the fight against corruption remains a major issue for companies and involves all their different

stakeholders, regardless of their level (managers, employees, business partners).

In addition to this Code of Conduct, detailed policies and procedures have also been drawn up for every key aspect of compliance.

In addition to the legal risks, corruption subjects the company to the negative impact of risks to its image and reputation and therefore commercial risks and the danger of destabilising its internal organisation (loss of market, clients, subsidiary closures, etc.). Because of their high visibility, our customers are particularly sensitive to ethical issues, which can tarnish their reputation. They thus require perfect control and greater transparency from all their commercial partners in this sense. Furthermore, they may be held liable as clients for ethical problems in the supply chain, without even being directly involved.

2.4 Guide to preventing corruption and influence peddling

Sagemcom has developed a “Guide to Preventing Corruption and Influence Peddling” to challenge popular beliefs and to make company stakeholders aware of the different mechanisms of corruption. It aims to explicitly reaffirm the standards and principles that dictate everyone’s conduct in order to respect rigorous measures set up to fight against corruption. Its aim is to guide all the Group’s employees and managers in their daily activities, providing them with the necessary practical knowledge and explaining how to act in accordance with the anti-corruption rules, through a presentation of the most important rules, the situations likely to be encountered the most, and the procedures to follow.

Due to there being multiple forms of corruption, several solution outlines are offered, which take the form of examples of action to take or reaction to have. It should be noted, however, that the responses suggested are not fixed, but allow common sense, which is expected of everyone, to play a role. Therefore, in practice, Sagemcom employees are trained and mentored to be fully vigilant in order to:

- avoid bribing, directly or indirectly, to benefit from improper commercial advantages
- not accept bribes, directly or indirectly, to offer improper commercial advantages.

Corruption can only be prevented in the company with and for the people who work there. This means that every single Group employee must take part in this initiative every single day by adopting the principles set forth in this guide. This is why training tools have been put in place with a specific e-learning programme and in-person training for the personnel most at risk. Initially rolled out in France, these training measures have been gradually deployed in the Group's various subsidiaries. In 2024, the subsidiaries in China, Tunisia, Brazil, Germany and Vietnam received training.

2.5 Reporting systems

Despite all the information made available to each Group employee, some situations are likely to present difficulties in terms of ethical choices, the solution not always being immediate or obvious. Everyone has the right to whistleblow, or the ability to speak up when they think they have good reason to consider that a directive received, a transaction or, more generally, a particular situation encountered (or witnessed) does not appear, as far as they understand, to comply with the rules governing the conduct of the Group's activities. Sagemcom has a no-reprisals policy when a legitimate concern is reported.

This is why the Group has developed support systems on which staff and stakeholders can rely:

- a hotline: ethics@sagemcom.com
- a professional reporting system: Whispli. Anyone, whether they are a member of the organisation or not, can use this secure solution to communicate with Sagemcom's ethics team in complete confidentiality, and the whistle blower can even remain anonymous, if they so wish (subject to national legal obligations that may prohibit anonymity). This tool can also be used to manage alerts and queries, and to store and archive evidence that comes under scrutiny, in every case. This compliance reporting channel is available on Sagemcom's website, in the "Contact us" section, or directly on the Whispli platform: <https://sagemcom.whispli.com>
- an ethics officer
- the local Human Resources Department.

In 2024, no reports were made via the hotline, three were received via the Whispli platform, and one through an ethics officer. All were reviewed and just one report resulted in a thorough investigation followed by appropriate corrective actions.

2.6 Ethics in the supply chain

In addition to the commitments and training and control measures developed for its employees, Sagemcom is committed to expanding its corporate

responsibility commitments to its suppliers, which resulted in particular in 2007 in the development of a “suppliers” Ethical Charter, with which all of the Group’s partners must comply. Sagemcom pays particular attention to the selection and monitoring of its partners (in particular through audits), in an approach of progress and continuous improvement, directly linked to the Group’s corporate purpose and mission (see Section G1-2).

2.7 Prevention of fraud

The prevention of fraud is a priority for Sagemcom, and we have taken a series of strict measures to detect and prevent any fraudulent behaviour. The internal procedures are designed to identify any anomalies and suspicious transactions at every stage of our operational processes.

Sagemcom has also embarked on a programme to raise the awareness of employees who are most exposed to the risk of fraud, to equip them with the knowledge and the tools required to identify and report any suspicious activities. A first session was organised, marking the actual start of this prevention initiative. Confidential channels of communication are available that allow them to report any suspicion of fraud without fear of any reprisals.

2.8 Compliance with international regulations and business restrictions

Sagemcom conducts thorough background checks on its business partners, customers and suppliers before engaging in business relations or signing contracts with them. These checks include an examination of the lists of international sanctions and warnings as well as a reputation analysis. This provides a first level of assurance that none of the parties involved is subject to sanctions and restrictions, or is involved in a crippling scandal. To do so, Sagemcom uses up-to-date databases and specialised surveillance tools to keep track of changes to the regulations of sanctions in real time. These systems make it possible to carry out compliance checks on lists of international sanctions and warnings covering more than 150 jurisdictions, as well as on high-risk media sources related to compliance issues. This approach enables us to stay aligned with regulatory requirements, especially in a context where sanctions regimes are rapidly evolving in response to current geopolitical events (in particular the lists of the European Union and the Directorate General of the Treasury in France, and the OFAC SDN lists in the United States).

Sagemcom reacts quickly to updates of sanctions in order to adapt its business practices and relations accordingly. For example, a “Business Restrictions Note” is regularly issued by the Management, clearly indicating the countries that are subject to sanctions and for which restrictions must be applied. This note identifies countries subject to embargoes or limited restrictions and the precautions to be taken when operating in countries

subject to sanctions. These clear directives enable the teams to take informed decisions and minimise the risk of non-compliance.

2.9 Compliance with the rules pertaining to fair trade

Sagemcom strives to create and maintain a free and equitable market environment, strictly complying with the anti-trust laws and regulations in force. In this regard, the Group has introduced a strict “Anti-Competitive Practices Policy” that is clearly communicated to every level of our organisation to ensure it is properly applied. A specific fact sheet, entitled “Anti-competitive practices”, has been drawn up, defining the main types of prohibited behaviour, such as abuse of dominant market position, agreements or collusion. Finally, Sagemcom also plans to draw up a practical guide specifically dedicated to the risks associated with anti-competitive practices, particularly in the context of public procurement.

2.10 Management of conflicts of interest

The prevention and management of conflicts of interest are crucial aspects of Sagemcom’s commitments to ethical and transparent governance. Strict policies and procedures have therefore been put in place to proactively identify, prevent and manage these situations:

- policy and procedure for managing conflicts of interest
- a Conflicts of Interest fact sheet
- a Conflicts of Interest practical guide.

In this regard, clear guiding principles for all Group employees, identifying the types of situations likely to create conflicts of interest, including personal or financial relationships that could influence professional decisions, are regularly communicated to all staff and included in training programmes. Sagemcom also fosters a culture of integrity, enabling employees to feel empowered and encouraged to report any concerns without fear of reprisal. The Management plays a key role in the oversight of these policies, and makes sure that corrective actions are taken quickly in all instances of non-compliance.

2.11 Compliance with the rules pertaining to export controls

Over 70% of the Sagemcom Group’s revenue comes from countries other than France. Sagemcom is committed to complying with international, domestic and local laws and regulations pertaining to export controls, to ensure that its products, technologies and services are not used for illegal purposes. Before exporting, checks are conducted to make sure that the recipients, destinations and end uses of the products meet all the legal and regulatory demands. These checks include the verification of the lists of embargoes, sanctions and restrictions specific to certain countries, entities or individuals. Sagemcom has also introduced awareness-raising

programmes for its employees to enable them to understand the regulations in force. These awareness-raising programmes cover subjects such as the identification of products subject to restrictions, the classification of articles and the procedures to be followed to obtain the necessary licences.

By informing its employees of the latest changes to regulations, Sagemcom ensures that they have the knowledge required to comply with the applicable rules. The Group also works with external consultants and specialised legal advisers to keep abreast of any changes to the regulations that apply to export controls. This collaboration enables the Group to quickly adapt its policies and practices to legislative changes and to guarantee continual compliance.

2.12 Combating corruption, money laundering and terrorist financing

Sagemcom implements robust policies and procedures to prevent, detect and report any suspicious activities with regard to money laundering and “by maintaining a high level of vigilance, we can improve our capability of detecting and preventing illegal activities” related to the funding of terrorism, in accordance with international and domestic laws and regulations.

The effectiveness of Sagemcom's AML/CFT (Anti Money Laundering and Combating the Financing of Terrorism) programme is guaranteed by strict Know Your Customer (KYC) processes. These processes include an in-depth verification of the identity of customers, an assessment of their risk profile and the continuous monitoring of their transactions. Sagemcom offers regular training to its employees exposed to this risk to make them aware of the potential signs of non-compliance, particularly in terms of money laundering and the funding of terrorism. These training programmes cover subjects such as the identification of suspicious transactions, the procedures used to declare suspicions and the main legal obligations in force.

3. Indicators and targets related to corruption or proven bribery

3.1 Operational results

Results	2022	2023	2024
Percentage of anti-corruption e-learning	7.6%	9.3%	65%
Number of reports received	2	2	4
Number of proven cases	0	0	0
Percentage of compliance training	N/A	100%	100%
Percentage of Export Control awareness	N/A	N/A	66.7%

Supplier relationship management

1. Supplier relationship management policy

Sagemcom's Purchasing policy, shared with the Group's suppliers and subcontractors, is driven by six fundamental principles: quality, price, lead times, innovation, respect for the environment and ethics.

The Group's suppliers have been involved in Sagemcom's CSR approach for several years, and the people who work in Purchasing, and who are responsible for our relations with our suppliers, are naturally heavily involved in this initiative through the various processes, particularly training, set up by the Group.

In this regard, different work streams are identified within purchases pursuant to this corporate policy:

- 2007: creation of the Sagemcom Ethical Charter, the first CSR audit in the supply chain to be managed by a third party
- 2011: membership in the United Nations Global Compact
- 2016: new CSR strategy, strengthen internal knowledge and skills with two auditors dedicated to China
- 2023: 144 ethical audits during the year
- 2024: 195 ethical audits during the year (3 exclusions).

Sagemcom's approach is based on continuous improvement approach, and aims to be positive and collaborative, in order to advance the entire supply chain. Every new supplier on the critical portfolio must therefore adopt this approach.

ESG analysis tools are used to examine a supplier's reputation in order to gain a comprehensive view of their history. The results obtained make it possible to draw up the first assessment of supplier compliance and areas for improvement. Once engaged in a business relationship, each supplier must sign the Ethical Charter, respect the rules and supply the items required during the audits. These audits are not only key steps in confirming the supplier's status, but also make it possible to jointly draw up the improvement plan to reach the requisite level.

In order to strengthen this initiative, Sagemcom joined the Responsible Business Alliance (RBA) in 2022, thereby contributing to contribute to the collective effort of the electronics industry by aligning its working methods and triggering the synergies enabled by this grouping in terms of audits and monitoring.

As regards conflict materials, Sagemcom participates in the Responsible Minerals Initiative (RMI), and collaborates with other companies and stakeholders in order to improve the traceability and responsible procurement of minerals.

2. Actions and resources related to supplier relationship management

2.1 Ethical Charter

The Sagemcom Group's Ethical Charter is based, among others, on the international labour conventions of the International Labour Organisation (ILO), the Universal Declaration of Human Rights, the UN Convention on the Rights of the Child and the RBA Code of Conduct (see section on the Ethical Charter in the "Workers in the value chain" section).

2.2 On-site audits

Audits are organised every year, on the basis of a complete risk analysis that covers the manufacturing plant, the technologies used and the processes, to verify the status of the suppliers in our purchasing portfolios and to support them in their improvement process. Consequently, 193 audits were carried out in 2024 on different supplier portfolios in order to have the most complete view possible of our supply chain.

These audits include 185 areas to be checked. Certain points demand closer attention and guide conduct towards suppliers:

- **What is prohibitive**
 - Child labour
 - Forced labour
 - Fatal risks
 - Incomplete data
 - Refusal to collaborate.
- **What is unacceptable – to be corrected immediately**
 - Uncontrolled chemicals
 - Dormitories that are locked / do not have an emergency exit
 - Discrimination
 - Corporal punishment, physical or mental harassment
 - No authorisation to operate (Env)
- **What is critical: to be corrected as a priority**
 - Unsafe working conditions
 - Poor living conditions (insalubrious dormitories, etc.)
 - Excessive working hours
 - Failure to pay the minimum wage
 - Absence of anti-corruption processes

In order to have the most complete view possible and to ensure an independent verification, Sagemcom relies on third-party auditors during the first supplier audit. A Sagemcom auditor regularly assists these audits,

which facilitates the follow-up thereafter, with better knowledge of the issues and any non-conformities identified.

Once the audit has been completed, the auditors draw up a comprehensive report for the supplier. In the event of non-compliance, Sagemcom demands a corrective action plan and proceeds with the necessary follow-up audits. If the corrective measures are deemed to be insufficient, another audit takes place. Lack of progress on successive audits calls into question the business relationship between Sagemcom and the supplier.

If the instances of non-compliance are prohibitive (child labour, forced labour, incomplete data, refusal to collaborate or working conditions that put the lives of employees in danger), Sagemcom puts an end to all its business dealings with the supplier. This supplier is then delisted and “blacklisted” within the Group.

These audits are also an opportunity to discuss practices more generally with the suppliers and to assist them in their improvement processes, by providing follow-up indicators and sharing good practices observed elsewhere. The indicators are particularly useful tools for monitoring the progress made by suppliers and having a shared vision for the objectives to be achieved. A real change has therefore been observed amongst the Group’s main suppliers, who have made significant progress, especially in the protection of the health and safety of their employees, all around the world.

Process and quality audits, which also include inspections of environmental aspects, health and safety, and ethics, are also conducted to detect any high-risk suppliers and to trigger additional control audits.

2.3 Inventory and traceability of the chemicals used in the components

In order to ensure that products comply with the various European directives, and in particular with the REACH Directive (1907/2006) and the ROHS Directive (2011/65/EU), Sagemcom has set up a very thorough chemicals management system, which starts with the overall inventory of all the substances used in the manufacturing plants and in the components used. A traceability system dedicated to SVHC (Substances of Very High Concern) has been implemented to determine the substances of very high concern contained in the products.

Sagemcom uses this tool to ask its suppliers to provide information on the SVHC content of the materials they use. Since the list of SVHCs is updated every 6 months by the ECHA (European Chemicals Agency), our suppliers are questioned on a regular basis. They are asked to provide complete physical-chemical descriptions that contain all the substances present in the components. Once received, this information is then compiled in a database.

This research covers the Group's entire supply chain, which is made up of hundreds of suppliers and tens of thousands of components. Finally, the Group's production centres, particularly in Tunisia, are equipped to conduct RoHS compliance tests, in particular for the different phthalates that are outlawed by the regulations.

2.4 Conflict minerals policy

Sagemcom's conflict minerals policy is aligned with the company's broader commitment to responsible procurement and sustainability. Conflict minerals usually include tin, tantalum, tungsten, gold (often called 3TG) and cobalt, which are extracted under conditions of armed conflict and violations of human rights, mainly in the Democratic Republic of the Congo (DRC) and neighbouring countries. Sagemcom aims to avoid contributing to armed conflicts or violations of human rights in its minerals supply chain, and is committed to using minerals from responsible sources in its products.

To this end, the Group demands that its suppliers demonstrate reasonable due diligence regarding their sources and the chain of ownership of 3TG minerals. This reasonable due diligence meets the requirements of the framework laid out in the OECD Due Diligence Guidance applying to responsible supply chains of minerals sourced in conflict or high-risk zones. Sagemcom implements a transparent mineral procurement chain by participating in the Responsible Minerals Initiative (RMI), and collaborates with other companies and stakeholders in order to improve the traceability and responsible procurement of minerals. As a member of the RMI, the Group expects its suppliers to share information on the origin of the 3GT minerals used in the products supplied to Sagemcom.

Sagemcom also gives public account of its policy and practices regarding conflict minerals, to make sure that stakeholders are informed of the efforts and the progress it has made.

With a view to continuously improving the conflict minerals programme, Sagemcom regularly revises and updates its policies and practices in accordance with the emerging best practices and new developments in the industry's standards. Sagemcom takes these measures to minimise the risk of procuring conflict minerals and to ensure the ethical and sustainable use of minerals in its products. This policy reflects Sagemcom's broader commitment to corporate social responsibility and ethical business practices.

It should be noted that whenever a non-conforming refiner is detected, Sagemcom asks its suppliers to conform or to remove them from their supply chain.

2.5 Next steps

In order to improve the traceability of these components, the information on conflict minerals is cross-referenced with the component materials declarations, and this will provide a much more granular view of the use of tin, tantalum, tungsten, gold and cobalt in the products, and a clearer view for Sagemcom of the existence of conflict minerals. The goal for 2025 consists of covering at least 97% of components purchased with a valid CMRT.

2.6 Critical raw materials

Since 2011, the European commission has defined a tri-annual list of raw materials, which are critical for the European economy as part of its Raw Materials Initiative, launched in 2008. In this list, 27 raw materials were identified as critical in 2020.

Sagemcom is determined to include the use of these materials in its products. This, of course, involves identifying all the substances present in each one of the components. In doing so, Sagemcom identifies potential uses and works on the diversification of its supply sources, from a geographical (the source of materials) and technological (substitution solutions) point of view.

Within the same product, the importance of these materials can vary, especially according to the number of high-risk components used. The detailed analysis of their use makes it possible to assess their strategic importance for the Group and to incorporate the issue into its risk management strategy.

3. Indicators and targets related to supplier relationship management

The target in 2024 was to audit at least 90% of the purchasing volume of the Group's 19 critical portfolios. This target was achieved with over 99% coverage. This performance must be maintained in 2025. The longer-term goal is to ensure that all suppliers progress to level A or B according to the JAC methodology in 2030. This indicator is audited by a third party under the Group's status as a mission-driven company.

For conflict minerals, whenever the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template is updated, and when new components are qualified, suppliers must provide a Conflict Minerals Reporting Template (CMRT). Company-wide CMRTs are also acceptable, even if they raise some uncertainty about the presence of certain minerals. In 2024, Sagemcom received a CMRT for over 96% of the components purchased during the year.

	2021	2022	2023	2024
% of components covered by a valid CMRT	94.34%	94.18%	95%	96%
% of components covered by a valid EMRT	92.74%		95%	96%

Type of audits	Status	2024 audit	Volume of supplier sites	Percentage of results
Follow-up audits	On target	A/B	33	64%
		C	10	20%
	Not on target	C	1	16%
		D	7	
	Non-compliant -> removed from portfolios	D	3	
	TOTAL			54
Initial	New suppliers	A/B	65	47%
		C	20	14%
		D	54	39%
TOTAL			139	

Sagemcom

Sagemcom Group
4 Allée des Messageries
92270 Bois-Colombes
www.sagemcom.com

