

2025

***Sustainability Report***



**Sagemcom**



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# General Information

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## 1. Corporate Social Responsibility at Sagemcom

For many years, the Sagemcom Group has been actively committed to its corporate social responsibility initiative, which it views as a strategic driver of differentiation and transformation, recognized both in its markets and within its ecosystem, as well as by all of its stakeholders, both internal and external.

A member of the Global Compact since 2011, certified Ecovadis Gold since 2016 and Platinum since 2021, voluntarily publishing a CSR report since 2014, and aligned with the SBTi since 2021, the Group's numerous initiatives demonstrate this commitment, which has become part of its corporate culture.

In 2022, Sagemcom decided to take this corporate culture to the next level by further strengthening its commitments to corporate social responsibility: the Group is becoming a "mission-driven company." This is a deliberate and, above all, highly proactive step, as it is based on defining a purpose linked to objectives that become statutory and are regularly audited by a third party.

The distinctive feature of this status lies in:

- In its comprehensive overview of corporate social responsibility issues,
- In the transformative role it plays in fulfilling the commitments made as part of the mission, both for the company and for its ecosystem,
- In establishing a governance structure specifically tailored to the Group's mission,
- Through regular third-party audits designed to assess the relevance and quality of this governance structure, the consistency of the mission, the ambition of the statutory objectives and associated roadmaps, as well as the robustness and achievement of the associated indicators.

The creation in 2024 of a CSR Department, which reports directly to the Executive Committee, rounded out this framework. The department is responsible for overseeing the implementation of the climate strategy, coordinating key functions (R&D, Procurement, Operations), and aligning the transition plan with European reporting standards (CSRD).

## 2. Sagemcom, a mission-driven company

Since January 2022, Sagemcom has become a mission-driven company. This commitment builds on all the initiatives undertaken to date, giving the Group a new sense of purpose and serving as a unifying and inspiring corporate vision.

This new identity has gradually taken shape around a core mission, articulated through five pillars that now guide its strategy and day-to-day operations.

## 2.1 Sagemcom's Purpose

"Around the world, thanks to the innovative solutions designed and manufactured by our teams, we enable as many people as possible to access high-speed internet, entertainment, and sustainable energy: that is our purpose."

## 2.2 The 5 pillars and operational objectives

- **Support environmental initiatives to reduce the impact of our activities**, taking into account the specific characteristics of local environmental and economic conditions, as part of a broader effort to combat climate change.
- **Develop our eco-design processes** to minimize the environmental impact of our products and services throughout their entire lifecycle.
- **Align our ethical and environmental requirements, as part of our procurement policy, with a roadmap shared with the Group's suppliers** and validated by our audit and evaluation strategy.
- **To promote a work environment that helps protect the health and safety of our employees and enhances their quality of life at work.**
- **Support our employees in their professional development** throughout their time with the Group, drawing in particular on our shared values and the promotion of diversity.

This "mission-driven company" status should be viewed and understood as a reflection of Sagemcom's corporate culture regarding CSR issues, as a cornerstone of its actions, and as an ambitious and transformative roadmap for Sagemcom and its stakeholders. It will be referenced regularly throughout this report.

Beyond the commitments included in Sagemcom's purpose, cross-cutting issues shape the Group's policy, including cybersecurity, which is a major challenge for Sagemcom and for the Group's entire ecosystem. In this regard, even though this topic is not currently included in the CSRD's reporting requirements, Sagemcom considers it highly material and will dedicate a separate section to it in this report.

## 2.3 A commitment rooted in the United Nations Global Compact

As a signatory to the United Nations Global Compact since January 2011, Sagemcom is committed to an ethical approach, the promotion of human rights, and compliance with the standards of the International Labour Organization (including the eight conventions) both within the Group and among its suppliers.

## Principles of the United Nations Global Compact

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<b>Human rights</b>	To support and uphold human rights internationally.
	Ensure that human rights are not violated.
<b>Work</b>	Affirm the freedom of association and the right to collective bargaining.
	Confirm the elimination of all forms of compulsory or forced labor.
	Confirm the abolition of child labor.
	Ensure the elimination of employment discrimination.
<b>Environment</b>	Support an environmental approach.
	Take steps to promote greater environmental responsibility.
	Encourage the development and widespread adoption of environmentally friendly technologies.
<b>Anti-corruption</b>	Combat corruption in all its forms, including extortion.

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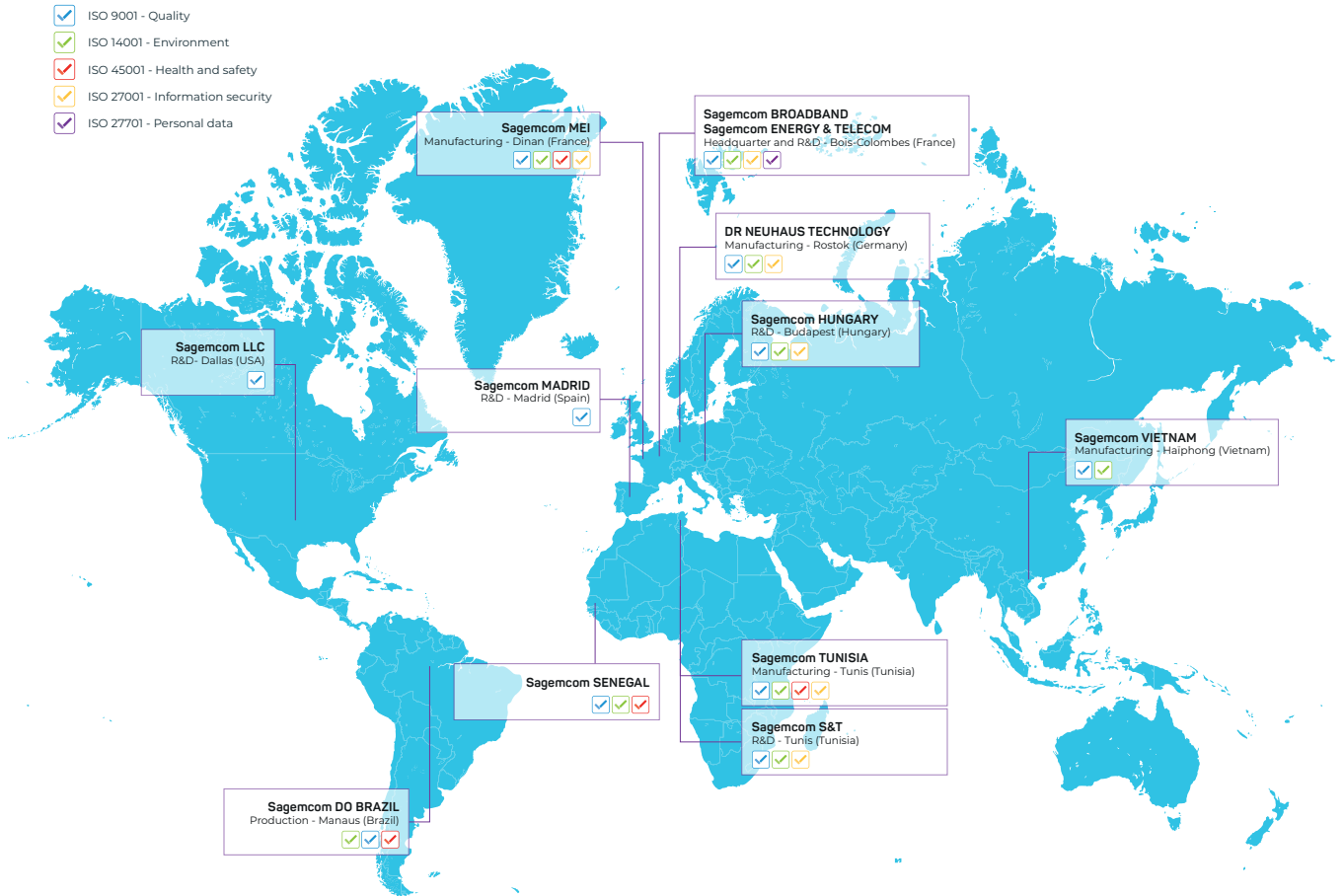
As a signatory to the Global Compact, the Sagemcom Group is committed to upholding and promoting these principles, which are reflected in the Group’s policy titled “Sagemcom’s Global Policy on Working Conditions, Respect for Human Rights, and Environmental Protection” and are incorporated into Sagemcom’s corporate mission.

The Group also encourages its suppliers, partners, and subcontractors to adopt, support, and apply these core values—which are set forth in a mandatory Ethics Charter for all business relationships with Sagemcom (see page 128)—within their respective areas of responsibility. These principles are addressed through various areas of focus described in this document.

Finally, it should be noted that in 2024, the Sagemcom Group specifically created a CSR Department, reporting to the CSR & Communications Department, which is part of the Group Executive Committee. Its objectives are to structure and implement Sagemcom’s CSR strategy, ensure compliance with the Group’s decarbonization targets—notably by strengthening the eco-design of products—steer Sagemcom’s purpose, and lead 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 are ISO 50001 certified. Finally, all operational sites\* are ISO 27001 certified.



\*

	ISO 9001	ISO 14001	ISO 50001	ISO 45001	ISO 27001	ISO 27701
<b>Corporate</b>	100%	100%			100%	100%
<b>R&amp;D Site</b>	100%	96%			96	22%
<b>Industrial site</b>	100%	100%	93%	97%	95%	

Organization and external initiative	Description	Commitment by Sagemcom
<b>United Nations Global Compact (UNGC)</b> 	United Nations initiative to adopt principles on human rights, labor, the environment, and anti-corruption.	Signatory since January 2011
<b>Carbon Disclosure Project (CDP)</b> 	A transparency platform for corporate climate actions and their supply chains.	Grade B for the climate in 2024; Grade A for supplier engagement in 2024; Supplier assessment via CDP since 2022
<b>Responsible Business Alliance (RBA)</b> 	A network promoting responsible practices in global supply chains.	Member since November 2022
<b>Sustainable IT Charter (INR)</b> 	Commitment to ethical, sustainable digital practices that respect fundamental rights.	Signatory since February 2024
<b>Global Reporting Initiative (GRI)</b> 	International framework for corporate non-financial reporting.	Sagemcom complies with GRI requirements and prepares its reports in accordance with them
<b>Responsible Minerals Initiative (RMI)</b> 	A reference tool for ensuring traceability and accountability in the mineral supply chain.	Compliance with RMI principles and use of traceability templates
<b>EcoVadis</b> 	Supplier CSR assessment platform covering ethics, social issues, environmental issues, and responsible procurement.	Platinum Certification 2025 (99th percentile)
<b>Science Based Targets initiative (SBTi)</b> 	An initiative setting carbon reduction targets aligned with the Paris Agreement.	Pathway validated by the SBTi: <ul style="list-style-type: none"> <li>• 2030: 100% renewable energy at our sites; a 47% reduction in our Scope 1 and 2 emissions; a 31% reduction in our Scope 3 emissions.</li> <li>• 2040: Net Zero compared to 2019</li> </ul>

## 4. Group Policy 2025



### SATISFY OUR CUSTOMERS TO MAINTAIN O

- In a highly competitive context, use our innovation skills to keep our customers loyalty and conquer new ones
- Consolidate our customer portfolio while maintaining our profitability
- Continue to grow our income, while meeting our customers' expectations and anticipating their needs

### CONTINUE THE DEPLOYMENT OF OUR MISSION DRIVEN STRATEGY NEW ESG REPORTING

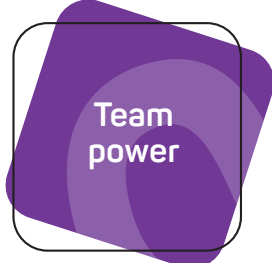
- Support action in favour of the environment in order to reduce the impact of our activities by taking into account the specifics of every environmental and economic situation, with a view to globally combating climate change
- Develop our eco-design processes in order to limit the impacts of our products 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

### CONTROL OUR PRODUCTS AND SOLUTIONS

- 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 and maintain the security of field products
- Continue DFM (design for manufacturing) actions
- Anticipate regulatory changes
- Innovate in reducing the impact of our products and solutions
- Amplify innovation by integrating AI into our product and solution

### DEVELOP OUR TALENT CAPITAL

- Adapt and support the group's developments in terms of organization and management
- 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
- Guarantee the efficiency of our organizations, particularly in the hybrid mode working context



## OUR LEADERSHIP POSITION IN THE MARKET

- Value and develop value-added services offers
- Leverage our excellence by taking into account field returns, via "Quick Quality Loops", and performance indicators
- Deploy artificial intelligence in our processes, methods and tools to improve our efficiency and responsiveness

## EN COMPANY COMMITMENTS WHILE PREPARING FOR NG REQUIREMENTS

- 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
- Prepare ourselves for new ESG (Environmental and Societal Governance) reporting requirements

## SECURE INFORMATION

- Amplify the security of our infrastructures, our data (including personal data) and services (including those operated for our customers)
- Extend 27001 certification to ensure compliance of our production sites
- Improve our responsiveness/protection towards increasing cyber-attacks
- Supervise and secure our dependencies with our partners, particularly cloud ones and industrial partners
- 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.)
- Support the deployment of solutions based on AI (internal tools/products)

## OPTIMIZE OUR SUPPLY CHAIN

- Adapt our logistics, industrial, purchasing and quality strategies to changing global context, to respond to the various challenges
- Secure the supply chain thanks to our industrial know-how and the expertise of our main suppliers
- Reinforce the quality control of our suppliers and components in an evolutive context
- In a competitive context, optimize our purchasing costs for finished products, components and services
- Strengthen the implementation of our business continuity plan

## 5. Impact, Risk, and Opportunity (IRO) Management

Since its inception, Sagemcom has conducted risk analyses using various methods, including ISO standards and internal processes. These analyses have led to organizational, technical, or financial decisions that have demonstrated the Group's effectiveness in its ability to identify risks and develop strategies to overcome them (strategic repositioning, the COVID-19 crisis, incidents at one of its sites [fire] or along its supply chain [component shortages, tsunami, etc.]).

The CSRD approach has led the Group to adopt a new methodology for mapping its ESG (Environmental, Social, and Governance) risks. Each of the topics covered by the CSRD has been analyzed by dedicated working groups, bringing together technical expertise from various business lines, sectors, and complementary fields. It should be noted that each person involved in the IRO analysis process maintains ongoing relationships with their stakeholders regarding their specific topics. Internally, employee expectations on these issues are addressed through regular social dialogue structured around bodies such as the Social and Economic Committee or the Health, Safety, and Working Conditions Committee.

The analysis of IROs, conducted throughout 2024, enabled Sagemcom to formalize an initial double materiality analysis, which was presented to the Sagemcom Group's governing bodies (Executive Committee, Supervisory Board, Audit Committee). In the absence of a CSRD reporting requirement in 2026 for 2025 data, this initiative remains voluntary and is not intended to be 100% compliant with the methodology required by the CSRD standard. Its objective is to align with a standard adopted by a large part of the Group's ecosystem, which includes effects considered beneficial by Sagemcom, particularly in terms of transparency in non-financial reporting. It should also be noted that all of the Group's activities across its various geographic regions have been included in this analysis, except where otherwise specified in the text. The analysis of Sagemcom's value chain currently focuses on Tier 1 suppliers.



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# Climate change

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## 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°C\* above pre-industrial levels by setting an ambitious roadmap to reduce its greenhouse gas emissions and achieve net zero, in absolute terms and across all scopes, by 2040.

This trajectory has been validated by the SBTi (Science Based Targets initiative), which requires the identification of an intermediate target, about ten years after the baseline year, to be identified to measure the reality and possibility of the set trajectory. Sagemcom has therefore set a 2030 milestone, validated by the SBTi, corresponding to an absolute reduction of -47% on Scopes 1 and 2, and -31% on Scope 3, of its greenhouse gas emissions compared to 2019. In addition, the Group has committed to the SBTi to source 100% renewable energy on its sites by 2030.



Sagemcom is also committed to a transition plan that aligns with the Paris Agreement, with a target of limiting global warming to 1.5°C, covering 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 to its customers,
- adapting to climate change through energy efficiency measures (intra-Sagemcom deployment of a personal self-consumption solution),
- energy efficiency with site-specific action plans aimed at reducing energy consumption,

- Deploying renewable energy solutions through the implementation or execution of Power Purchase Agreements (PPAs) or renewable energy certificates.

*\* The 1.5°C threshold compared to pre-industrial levels corresponds to the goal set by the Paris Agreement (2015) to limit and significantly reduce the risks and impacts associated with climate change.*

## 2. Actions and resources related to climate change policies

Sagemcom has implemented a carbon accounting process which is carried out annually and verified by a third party, in line with its status as a mission-driven company (three of Sagemcom mission's statutory targets are related to reducing its carbon footprint), in response to non-financial reporting requirements, and to support the Group's customers and partners in their transition to "Net Zero."

Sagemcom's greenhouse gas (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 inventory is prepared in accordance with the recommendations of the Greenhouse Gas Protocol (GHG). The choice of asset modeling is based on the Sagemcom Group's internal depreciation policy (depreciation over one year), with no depreciation planned for the property portfolio.

### 2.1 A greenhouse gas emissions inventory measured almost exclusively in physical flows

Sagemcom's decision to implement a GHG emissions inventory based on physical flows was first applied to the 2023 carbon footprint report. This decision is exceptional within Sagemcom's ecosystem and, above all, demonstrates the strength of its commitment and the accuracy of its indicators, which are essential for developing a realistic decarbonisation trajectory that can be effectively managed from year to year.

Sagemcom's GHG emissions inventory is verified annually by a third party.

Over 95% 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 involves fewer uncertainties.

Therefore, the share of greenhouse gas (GHG) emissions in cash flows is less than 5% of the Group's total.

## 2.2 Scope of Sagemcom's greenhouse gas emissions inventory

The greenhouse gas emissions inventory published in this report covers all the activities of Sagemcom Broadband SAS and its subsidiaries for the 2025 financial year, and thus includes all consolidated legal entities in the Group's financial statements.

Unless otherwise stated, this organizational scope is aligned with that used for financial reporting in order to ensure consistency and comparability between financial and non-financial information verified by the same auditor answering to the CNCC.

As of the reporting date, the scope of consolidation includes all of the Group's operations.

## 2.3 Scope 1 & 2 emissions

Sagemcom has implemented a detailed reporting covering environmental data on a site-by-site basis.

Activity is measured in primary physical flows, and this data is tracked using a tool designed to monitor the environmental performance of sites, particularly in the context of the Group's ISO 14001 commitments. These activity data serve as the basis for the accounting of the Group's carbon footprint.

## 2.4 Electricity consumption

As part of its ISO 14001 management, Sagemcom has increased the share of renewable energy in its electricity consumption.

Since 2023, Sagemcom has operated its own solar power plant at its facilities in Tunisia, which meets approximately 15% of its annual energy needs, with plans to increase this production capacity in the coming years.

At the same time, the Group has entered into power purchase agreements (PPAs) for electricity that is certified as coming from renewable sources to cover the energy consumption of its sites wherever possible. When PPAs are not available, Sagemcom purchases renewable energy certificates (iRECs) to cover its remaining energy consumption.

All in all, Sagemcom's total consumption breaks down as follows (as a percentage of MWh consumed):

- Grid electricity consumption (primarily in Tunisia): 63.9%
- Green electricity contract: 20.6%
- Renewable energy certificates: 8.8%
- Self-production (at the group level): 6.7%

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

Sagemcom's Scope 3 emissions account for 99% of the company's total emissions. Moreover, reducing this impact is one of the key indicators of the Group's mission. By 2025, 18% of these emissions concern the manufacture of products, and 78% their use.

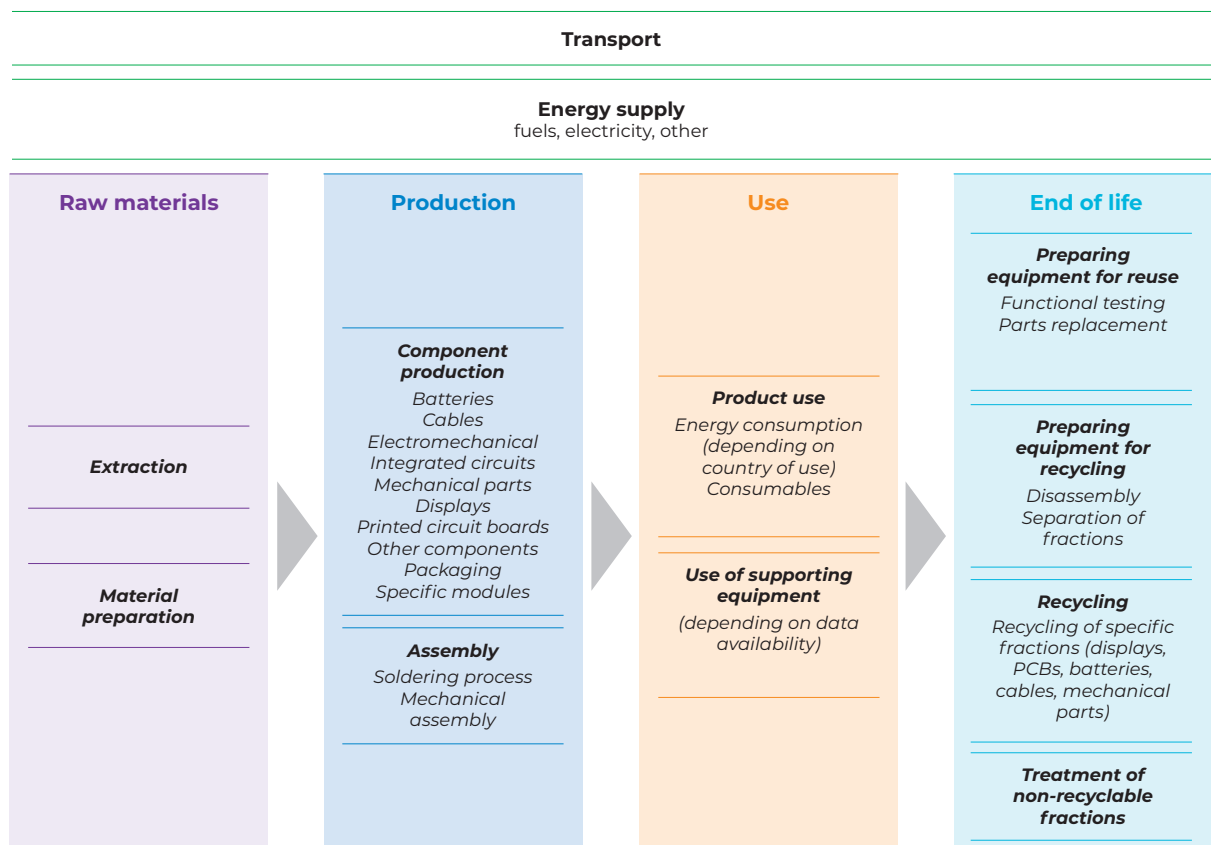
It should be noted that the Group's customer base, which spreads across many countries with high-carbon energy mix, has a direct impact on its carbon footprint. A strategy has therefore been implemented to identify the main sources of emissions related to the use of our products and to set up concrete and targeted actions to reduce them. In order to place eco-design at the heart of Sagemcom's product development, product life-cycle analysis (LCAs) are carried out using primary and secondary data, enabling the carbon footprint to be calculated using material flows. All of these data help define priorities for eco-design initiatives aimed at reducing the environmental impacts of the Group's products and solutions.

The physical (primary) data demonstrating the environmental characteristics of products are compiled in a product environmental passport, developed in-house at Sagemcom, which was designed and implemented in anticipation of the future European Digital Product Passport. This initiative is intended to standardise the collection of information required for life-cycle analysis.

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

## 2.6 Life-cycle analysis

LCAs are at the heart of Sagemcom's eco-design approach. They enable us to analyse current practices throughout the various stages of a product life-cycle and identify opportunities for environmental improvement. All major projects undergo analysis to assess their impacts: each product family is addressed with a tailored approach to reduce its environmental impact. These life-cycle analyses are conducted using a dedicated tool specifically developed for life-cycle analysis of electrical and electronic equipment: the EIME software developed by CODDE Bureau Veritas. Life-cycle analysis are conducted in-house in accordance with ISO 14040 and ISO 14044 standards, as well as sector-specific guidelines (PCR, PSR, PEF, ITU, etc.), while respecting the following boundaries:



These analyses guide strategic development decisions, particularly regarding the reduction of energy consumption: in fact, for the majority of Sagemcom’s portfolio, product use is the phase with the greatest environmental impact on their life-cycle.

This expertise also enables us to conduct life-cycle analysis as early as the initial design phases of new products, carried out in collaboration with certain clients. The goal is to estimate the environmental impact of a product in order to help clients choose between different scenarios, particularly regarding logistics and material selection. This work also enables the development of features that improve the management of power consumption for products involved in Sagemcom’s innovation process.

Sagemcom manages the quality of its carbon footprint using a rating scale for its LCAs: the higher the rating, the more reliable the LCA is; the highest rating corresponds to a third-party review, while the lowest corresponds to a comparison with a similar product. On this scale of 1 to 10, Sagemcom has a rating of 8.45/10 (7.7 out of 10 in 2024): this rating is third-party verified.

Thanks to the quality of this initiative, Sagemcom has become the first company in the world to receive the “Green Product Mark Certification”—issued by the German organization TÜV Rheinland for TV set-top boxes—as well as the Footprint Progress® label from Bureau Veritas for a pair of products consisting of an internet box and a Wi-Fi extender.

It should be noted that in 2025, 15.7% of Sagemcom's products are an eco-label (compared to 7.8% in 2024): for example, 28.1% of sales in the Audio Video Solutions business unit are covered by an eco-label, and 16.7% of sales in the Broadband Business Solutions business unit.

### **Reducing the energy consumption of products: a strategic priority**

Through its life-cycle analysis (LCAs) of its product categories, Sagemcom has determined that 78% of their carbon footprint is generated during the use phase, mainly due to energy consumption. Therefore the majority of the company's CSR and technological innovation efforts are focused on this lever.

Sagemcom aims to significantly reduce the power consumption of its equipment both in operation and in standby mode, while ensuring performance, safety, and reliability for its entire product range: a major challenge given that the vast majority of the products delivered by the Group remain switched on 24 hours a day in end user's homes.

To address the challenge of reducing energy consumption, Sagemcom has designed and deployed several impactful innovations, such as:

- Ultra-low-power standby mode: Sagemcom's latest-generation products feature "deep sleep" modes that reduce power consumption by more than 90% when the device is idle, with power consumption of less than 0.3W,
- Programmable features (such as turning off Wi-Fi at night and automatic standby mode) accessible via the interface or mobile app, to encourage more economical use,
- Smart scheduling: systems that automatically shut down unused services (Wi-Fi at night, inactive Ethernet ports, etc.),
- Ultra-low-power electronic components: a selection of next-generation components that are more efficient and less energy-intensive.

For smart electricity meter ranges, the priority is to minimize power consumption, improve the efficiency of the AC/DC power supply, reduce the number of components by optimizing the electronic schematic design, choose more energy-efficient components, and finally, lower the frequency of the main microcontroller for gas and water meters to optimize battery life:

- highly efficient low-frequency radio transmission (LoRa, WMBus), enabling communications of only a few milliseconds,
- on-board energy management algorithms enabling more than 15 years of battery life, reducing maintenance and waste,
- Software optimization: by reducing the volumes of data exchanged and the frequency of data retrievals without compromising user performance.

These products don't just consume less energy; they also enable end users—both individuals and businesses—to reduce their own energy footprint. Thanks to smart meters, millions of households in Europe and around the

world can now monitor and reduce their energy consumption.

On a larger scale, smart meters provide network operators with real-time access to energy consumption and generation data, enabling them to detect and anticipate peaks and analyze usage patterns. As a result, these devices serve as tools to support energy efficiency policies and the management of supply and demand.

### **Circularity and End-of-Life of Products**

The circular economy is now emerging as an essential model for addressing the environmental challenges posed by the overconsumption of resources and the accumulation of waste. In the electronics sector, this approach is a major priority, as electronic equipment generates millions of tons of waste each year, much of which is poorly recycled. To address this issue, Sagemcom has adopted concrete strategies aimed at extending product lifespans, reducing their environmental impact, and promoting their reuse. Electronic products, such as internet box, smart meters, and set-top boxes, are made up of many materials, some of which are rare (metals, plastics, chemical components); and their manufacture and use require a certain amount of energy and natural resources. The circular economy aims to limit the environmental impact of this consumption by relying on three key principles: reduce, reuse, and recycle.

All of Sagemcom's initiatives are presented in the chapter on circularity (page 45).

## **2.7 Responsible management of upstream and downstream transportation**

Controlling our environmental footprint also requires rigorous and innovative management of logistics flows, from the shipment of components to the delivery of finished products. Sagemcom is committed to reducing the environmental impact of transportation throughout its value chain. For upstream transportation, Sagemcom works closely with its suppliers to optimize routes and prioritize the modes of transport with the lowest CO<sub>2</sub> emissions. Among the Group's key initiatives:

- priority to maritime and rail transport, which are far less polluting than air or road transport,
- local supply chain by selecting suppliers located near the factories whenever possible.

In downstream transportation, products are shipped around the world with a constant focus on reducing distribution-related emissions:

- Partnerships with carriers committed to the energy transition (low-emission vehicles, biofuels, ISO 14001 certifications, etc.) and a focus on maritime and rail transport,
- Experimenting with new, less polluting modes of transportation, such as sailboats,

- Manufacturing close to customers, particularly in Europe, with manufacturing facilities in France, Germany, Italy, and Tunisia,
- Optimizing packaging to reduce the volume and weight of shipments, thereby lowering the carbon footprint per delivered product.

### Measure, improve, innovate

Sagemcom monitors the environmental impact of its logistics operations using key performance indicators (GHG emissions, mileage, and the rate of eco-friendly freight).

### Transportation's carbon footprint (in tCO<sub>2</sub>e)

GHG Number	Sources of emissions	2020	2021	2022	2023	2024	2025
3-4	Upstream freight and distribution	2 937	3 228	7 509	4 355	9 247	11 273
3-9	Downstream freight and distribution	29 503	32 425	62 510	43 750	15 902	23 918

By optimizing its upstream and downstream transportation, Sagemcom is demonstrating its commitment to building a more sustainable supply chain, in line with its own climate commitments and those of its customers.

## 2.8 Environmental risk analysis

Sagemcom's operational sites are ISO 14001 certified. An environmental risk assessment is conducted and updated annually to identify and address the most significant environmental aspects of our operations.

Sagemcom is committed to managing the environmental aspects of its sites, such as air, water, and soil pollution, as well as noise pollution, waste generation (water, energy, etc.), and the management of hazardous substances. These measures are implemented at the Group's facilities under the responsibility of their facility managers, who work closely with environmental liaisons and the Group's CSR Department, in accordance with continuous improvement processes.

The Group's two main industrial sites, located in Tunisia, are central to Sagemcom's environmental priorities and are subject to specific energy management through 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 organization dedicated to disclosing data on the environmental impact of large

companies and supporting them in making changes through a rigorous scoring system. Building on the progress made in 2024, Sagemcom continues in 2025 to strengthen its suppliers' involvement in the CDP initiative. Suppliers identified within the Group's priority panels remain at the heart of this effort, with a consistently high level of engagement, as evidenced by a 100% response rate from surveyed suppliers—once again well above industry averages.

To ensure an accurate and relevant analysis, an internal rating system complementary to the CDP's has been developed to better address the Group's specific challenges. This system focuses on responses regarding decarbonization commitments: the closer these align with Sagemcom's goals—namely, net zero by 2040—the higher the supplier's maturity is rated, and vice versa. This ramp-up makes it possible to better identify the suppliers lagging behind on these issues and to implement targeted actions to help them make progress.

Sagemcom Notes	Comments
1/6	No carbon footprint assessment has been conducted
2/6	Scope 1 & 2 Carbon Footprint and Transition Plan
3/6	Carbon footprint for Scopes 1, 2, and 3 or for the scopes Scopes 1 & 2 with SBTi validation
4/6	Carbon footprint assessment for Scopes 1, 2, and 3, including a transition plan and SBTi validation for Scopes 1 and 2
5/6	Carbon footprint for Scopes 1, 2, and 3 with SBTi validation
6/6	Carbon footprint for Scopes 1, 2, and 3, with SBTi Net Zero validation by 2040

## 3. Objectives and indicators

### 3.1 Indicators and targets related to climate change mitigation and adaptation

Sagemcom's targets are clearly defined and validated by the SBTi:

- by 2030:
  - an absolute 47% reduction in Scope 1 and 2 emissions (direct emissions and purchased energy),
  - 100% renewable energy at the Group's sites,
  - an absolute 31% reduction in Scope 3 emissions, including those related to the value chain and without excluding any GHG categories,

- by 2040:
  - Net Zero, representing a 90% reduction in the Group's total emissions, in absolute terms, compared to the 2019 baseline year.

The tables below show the trends in the Sagemcom Group's gross greenhouse gas (GHG) emissions across Scopes 1, 2, and 3, calculated in accordance with the GHG Protocol and verified by a third party, based on a scope aligned with the Group's financial consolidation. Changes are assessed relative to 2019, the baseline year for our climate trajectory validated by the SBTi. Scope 2 emissions are presented using both the location-based and market-based approaches to reflect both local electricity mixes and the impact of electricity procurement from renewable sources. This carbon footprint is also based overwhelmingly on physical flows, which enhances the robustness of the published data. Finally, when interpreting these tables, one must consider the weight of Scope 3 in our carbon footprint: it accounts for 99% of the Group's emissions, primarily related to the manufacturing, use, and end-of-life of our products. These indicators thus serve as a key management tool for our decarbonization trajectory.

#### Scope 1 & 2:

	Scope 1 (tonnes of CO2e)	Scope 2 (tonnes of CO2e)		Combined Scope 1 and 2 (tonnes of CO2e)	
		location-based approach	market-based approach	location-based approach	market-based approach
<b>2023</b>	3 802	9 150	8 761	12 952	12 563
<b>2024</b>	1 192	7 893	7 968	9 085	9 160
<b>2025</b>	1059	8502	7116	9560	8175

## Pillar 1 - Mission-Driven Companies: 2025 Indicators

Operational objectives	Indicators	2024	2025	Trajectory
<b>By 2030, reduce our Scope 1 and 2 emissions by at least 47% (a target validated by the SBTi based on 2019 levels), and power our sites with 100% renewable energy</b>	Scopes 1 and 2 of Sagemcom sites direct and indirect emissions from gas and electricity, refrigerants, and fuel oil	-16% compared to 2019	-18% compared to 2019	
	Sagemcom Site Scope 3: Waste & Water	Waste: 80% reduction compared to 2019 (carbon footprint)	Waste: +49% compared to 2019 (CO <sub>2</sub> impact)	47% of Scope 1 and 2 emissions by 2030
	Transport Impact (average impact per tonnes-kilometer)	-23% compared to 2019 -53% vs. 2023	+29.9% compared to 2019 +70% compared to 2024	-31% Scope 3 emissions by 2030
	Percentage of renewable energy	26.6%	36.1%	
<b>Contribute to the environmental transition by taking concrete action within our ecosystem</b>	External contributions: workshops, membership drives, public speaking...	4	6	5 events per year by 2025
	Percentage of products sold that meet the criteria of the green taxonomy (BLE products and eco-labeled products)	22%	33.9%	100% of new products launched in 2030

### Scope 3:

GHG Number	Sources of emissions	2025	2024	2023	2019	Changes in 2025 compared to the base year (2019)
3-1	Purchased goods and services	549 583	618 534	872 783	1 093 224	-50%
3-2	Capital goods	8 993	4 109	973	665	1252%
3-3	Emissions related to fuels and energy (not included in scope 1 and Scope 2)	3 092	3 197	4 168	2 849	9%
3-4	Upstream freight and distribution	11 273	9 247	4 355	2 977	279%
3-5	Waste generated by operations	1 777	241	1 741	1 190	49%
3-6	Business travel	4 616	3 816	6 293	4 302	7%
3-7	Commuting	810	93	1 280	875	-7%
3-8	Upstream leased asset	840	6 470	13 527	9 248	-91%
3-9	Downstream freight and distribution	23 918	15 902	43 750	29 910	-20%
3-10	Processing of sold products	not calculated, not relevant	not calculated, not relevant	not calculated, not relevant	not calculated, not relevant	-
3-11	Use of sold products	2 343 566	2 193 535	3 063 609	3 803 155	-38%
3-12	End-of-life management of sold products	33 435	31 632	55 652	64 050	-48%
3-13	Downstream leased assets	not calculated, not relevant	not calculated, not relevant	not calculated, not relevant	not calculated, not relevant	-
3-14	Franchises	not calculated, not relevant	not calculated, not relevant	not calculated, not relevant	not calculated, not relevant	-
3-15	Investments	not calculated, not relevant	not calculated, not relevant	not calculated, not relevant	not calculated, not relevant	-
3-15-A	Other downstream indirect emissions	not calculated, not relevant	not calculated, not relevant	not calculated, not relevant	not calculated, not relevant	-

All product lifecycle mitigation measures (upstream freight, manufacturing, downstream freight, use of products sold, and end-of-life of products sold) have reduced carbon-intensity GHG emissions (kgCO<sub>2</sub>e per product sold) by 32,7% in 2025 compared to the 2019 baseline year.

## Pillar 2 - Mission-Driven Companies: 2025 Metrics

Operational objectives	Indicators	2024	2025	Trajectory
<b>Achieve Net Zero (as defined by the SBTi) by 2040 for our Scope 3 emissions through innovation and eco-design of our products and services</b>	Y1: Compliance with voluntary consumer standards Y2+: Percentage improvement relative to standards	AVS: -70% vs. VIA BBS: -31% vs. CoC BLE: N/A	AVS: -73.9% vs. VIA BBS: -29.3% vs. CoC BLE: N/A	Scope 3: -31% by 2030; then Net Zero by 2040
	Percentage of alternative materials purchased compared to virgin materials (plastic and metal)	31%	41%	
<b>Develop innovative alternatives that use fewer controversial substances and offer them to customers</b>	Percentage of halogen-free components in the product database	76.2% (shares)	77.8% (shares)	50% of materials and 50% of components to be halogen-free by 2025. 100% by 2030

## Client Sustainability Awards

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

- Sagemcom received the "Green Future Best Practice Award" from Deutsche Telekom in recognition of the effectiveness of its hardware and software solutions in significantly reducing Deutsche Telekom's Scope 3 emissions.
- At the KPN Supplier Event, Sagemcom was presented with the "Sustainability Award" for its many innovations in eco-design,
- Sagemcom received the "Orange Decarbonization Award" for its work in eco-design and decarbonization,
- Finally, the Tunisian-French Chamber of Commerce and Industry recognized Sagemcom for its social and environmental commitments, highlighting the CSR performance of all its Tunisian sites.

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# Pollution

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# 1. Policies on pollution

## 1.1 Environmental Management System

The Sagemcom Group's main sites are ISO 14001 certified and are therefore organized around a system of continuous improvement based on planning, risk analysis using SEAs (Significant Environmental Aspects), and the implementation of processes and procedures designed to integrate environmental issues—particularly pollution—into daily operations and to mitigate potential risks.

## 1.2 Methodology for Assessing Significant Environmental Aspects

To better manage its environmental impacts, Sagemcom implemented a new methodology for assessing significant environmental aspects (SEAs) in 2025. This SEA framework, based on a FMEA approach and the result of collaboration between the group's various environmental managers and the quality department, enables the different sites to prioritize their impacts in order to address environmental priorities and reduce pollution, whether under normal, abnormal, or emergency conditions.

This unifying approach also enables the corporate level to define cross-functional initiatives, which will allow for the establishment of new environmental objectives as part of ISO 14001 management in 2026.



### 1.3 Soil pollution

Sagemcom's operations do not involve direct land use. However, as the manager of its own facilities and manufacturing processes, the Group implements strict measures to prevent any risk of accidental spills that could lead to soil contamination. These measures include reducing the quantities of chemicals that could contaminate the soil, as well as establishing procedures, training, and testing to anticipate and effectively manage potential emergency situations.

In 2025, no leaks or soil contamination were reported at Sagemcom sites. Equivalent soil protection requirements are imposed on the Group's industrial partners. These aspects are systematically verified during on-site audits conducted at suppliers' facilities.

### 1.4 Air pollution

The location of Sagemcom's production sites, which are often situated near urban areas, makes the management of air emissions particularly important. The Group's industrial processes generate few heavy pollutants; the main emissions come from the soldering of printed circuit boards. The production lines are equipped with extraction and filtration systems designed to limit these emissions.

Sagemcom regularly undergoes testing by third-party organizations to ensure that these emissions comply with regulatory limits.

The Group applies similar standards to its suppliers, whose facilities and performance are monitored through on-site audits. In addition, transportation-related emissions are addressed as part of Sagemcom's global carbon emissions reduction program.

## 2. Actions and resources related to pollution

### 2.1 Waste management

In line with its mission-driven company status and its ISO 14001 certification, the Group is working to manage and reduce its waste. Beyond regulatory requirements, partnerships with various service providers have been established to minimize waste generation at the source and optimize recycling streams. Each site sorts its waste streams according to locally available recycling options.

In terms of products, Sagemcom is also working to reduce waste at the source, optimize product disassembly, enable remanufacturing, and more. Here are a few examples of measures we have implemented to reduce the amount of waste generated in our factories:

- ship raw materials from local suppliers in returnable plastic containers

instead of disposable cardboard boxes,

- tertiary packaging tailored to product families, thereby reducing the use of film and dividers, which leads to a reduction in shipping weight without compromising product protection and safety,
- Elimination of plastic packaging for accessories such as cables, power supplies, heat sinks, enclosures, etc.

Sagemcom also facilitates the recycling of its devices starting from the design phase (see the section on end-of-life management in the “circular economy” section).

## 2.2 Process water

The Group's water metering business requires the use of water for product testing, particularly in Tunisia. Sagemcom has chosen to develop the production line needed to manufacture these meters in-house, primarily to minimize water consumption while complying with the metrological rules and requirements necessary for metering operations.

In 2025, the volume of water used for product testing at the Ben Arous industrial site was 3,185 cubic meters, supporting the manufacture of smart water meters.

### 3. Pollution indicators and targets

The Group's efforts focus on monitoring potential sources of pollution and preventing any incidents that could lead to pollution. In particular, Sagemcom tracks metrics related to the amount of waste generated and the quality of its sorting.

#### Pillar 1 - Mission-Driven Companies: 2025 Metrics

Operational objectives	Indicators	2024	2025	Trajectory
By 2030, reduce our Scope 1 and 2 emissions by at least 47% (a target validated by the SBTi based on 2019 levels), and power our sites with 100% renewable energy	Scopes 1 and 2 of Sagemcom sites direct and indirect emissions from gas and electricity, refrigerants, and fuel oil	-16% compared to 2019	-18% compared to 2019	47% of Scope 1 and 2 emissions by 2030 -31% Scope 3 emissions by 2030
	Sagemcom Site Scope 3: Waste & Water	Waste: 80% reduction compared to 2019 (carbon footprint)	Waste: +49% compared to 2019 (CO <sub>2</sub> impact)	
	Transport Impact (average impact per ton-kilometer)	-23% compared to 2019 -53% vs. 2023	+29.9% compared to 2019 +70% compared to 2024	
	Percentage of renewable energy	26.6%	36.1%	
Contribute to the environmental transition by taking concrete action within our ecosystem	External contributions: workshops, membership drives, public speaking...	4	6	5 events per year by 2025
	Percentage of products sold that meet the criteria of the green taxonomy (BLE products and eco-labeled products)	22%	33.9%	100% of new products launched in 2030

#### 3.1 Waste 2025

Waste tracking was redesigned and standardized in 2025 to provide a better understanding of our waste streams, with the aim of implementing waste reduction policies.

waste	2023 (tons)	2024 (tons)	2025 (tons)	Objective 2030 vs. 2025
Non-hazardous	ND	2,461 (est.)	2 814	-10%
Dangerous	ND	30.2 (est.)	117	-10%

The targets will be reviewed in 2026, with a continued focus on refining the indicators—particularly those related to treatment objectives—to reduce waste at the source, reuse materials, recycle more and more effectively, and reduce the share of waste sent for thermal recovery and landfilling.

This review will be conducted through the group’s environmental seminars, which bring together all site representatives, in order to ensure a consistent and coordinated approach.

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# Aquatic and Marine Resources

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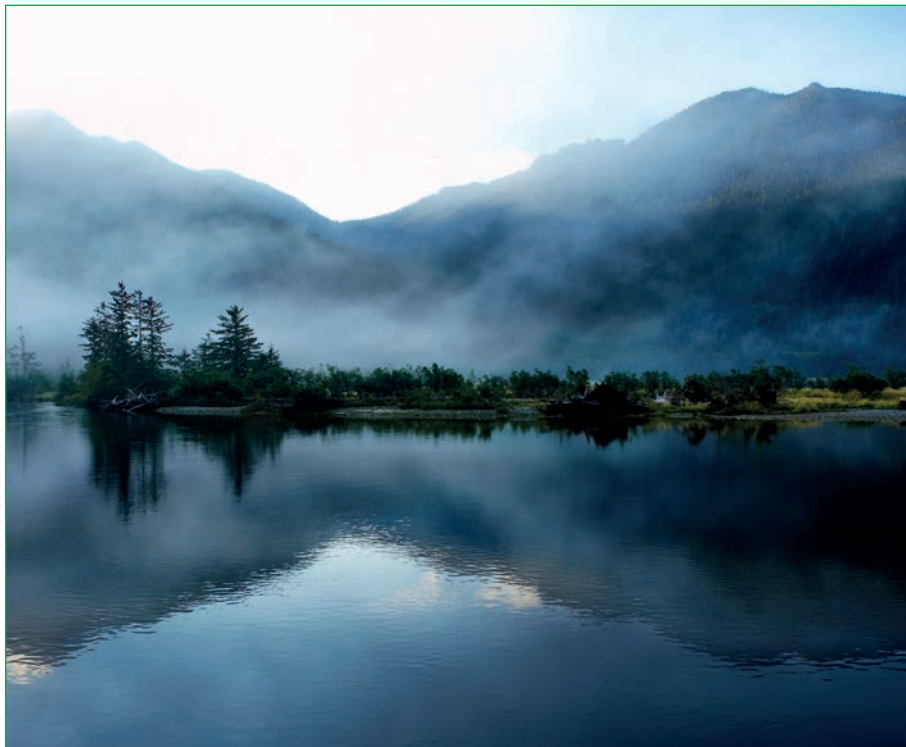
# 1. Water Resource Policies

## 1.1 Water Management

As a signatory to the United Nations Global Compact, Sagemcom is committed to operationally implementing Sustainable Development Goal (SDG) 6, which aims to achieve “universal and equitable access to safe drinking water, sanitation, and hygiene by 2030, particularly for vulnerable populations.” Because water is a scarce resource, Sagemcom advocates for responsible and sustainable water management across all its sites, taking into account the availability of freshwater as well as pollution risks. The Group’s environmental policy, based on the ISO 14001 standard, establishes a clear and shared framework for developing prevention plans and corrective actions as needed.

Sagemcom’s water management policy covers the following points:

- at all Group sites, ensure compliance with the regulatory requirements established by local and/or national authorities regarding water resource management, particularly with regard to water withdrawal and discharge,
- promote the efficient and sensible use of water in all circumstances,
- preserve water resources and aquatic or marine environments by developing solutions that enable the measurement, recycling, and balancing of water systems,
- use the ISO 14001 standard to develop prevention plans and identify potential corrective actions,
- reduce the amount of water withdrawn and consumed at our sites,
- ensure that water—particularly process water—does not come into contact with hazardous substances in order to ensure sustainable water use and prevent pollution,
- control, reduce, or eliminate water pollution where it exists.



## 2. Actions and resources related to aquatic and marine resources

### 2.1 Water consumption at Sagemcom sites

Most Sagemcom sites are located in areas where fresh water is available, and the majority of Sagemcom's water consumption is for sanitary purposes. To this end, consumption indicators and targets are set at each site to actively monitor water consumption and reduce it through various measures: reducing the volume of water used for flushing toilets, installing water-saving faucets to reduce flow rates, and reusing graywater on the Group's campus. As a result, by 2025, water consumption on the campus was 30% lower than the consumption recorded at the former site that the Group left in December 2023.

To achieve this level of performance, several measures were implemented in this new building:

- water-saving fixtures: sinks (maximum 2 liters per minute, down from a previous maximum of 12 liters per minute), dual-flush toilets (3/6 liters), and showers (6 liters per minute),
- reuse of graywater (from the sink to the toilet) after filtration and cleaning,
- monitoring of water usage with metered billing (plumbing/maintenance/technical equipment), leak detection systems, and rain sensors to dynamically adjust water usage for landscaping.

In terms of production, two of the Sagemcom Group's manufacturing sites are located in water-stressed areas in Tunisia. Particular attention is therefore paid to water consumption at these sites.

### 2.2 Product Impact

Sagemcom's product life-cycle analysis take water consumption and pollution into account. This helps identify the key components that impact water resources and analyze the effects of design choices to prevent the transfer of pollution, while ensuring that reductions in carbon impact do not negatively affect water.

### 2.3 Supply chain

To date, Sagemcom has not set specific targets related to water and marine resources within its value chain, although the Group ensures that its partners and suppliers adhere to industry environmental standards, such as the Responsible Business Alliance (RBA) Code of Conduct, for activities identified as most sensitive in terms of water management and/or exposure to pollution risks. The Group is mindful of the risks of exposure to water

scarcity and pollution that could impact workers in the value chain and/or local communities. Finally, all of the Group's suppliers are bound by their signature of an Ethics Charter, which is a prerequisite for any business relationship (See page 128) and devotes several sections to water management (resource conservation and use, wastewater and stormwater management, etc.).

### 3. Indicators and targets related to reducing water consumption

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

Water consumption is tracked through a centralized reporting system, with varying levels of detail depending on the specific characteristics of the Group's sites. In fact, some very modern buildings, such as the Group's Campus, allow for very precise monitoring and control thanks to multiple sub-meters; at the other end of the spectrum, some of the Group's sites are located in shared buildings, which do not allow for precise and customized visibility of Sagemcom's consumption.

In 2025, water consumption at the main sites (production, R&D, and headquarters) totaled 51,325 m<sup>3</sup>, representing a 1.6% decrease compared to 2024 on a like-for-like basis.

Although consumption has remained stable, reduction measures have been implemented and have significantly reduced the volumes used in production for meter calibration: a 30% decrease at our Ben Arous site, offset by increased production at our Vietnamese site.

Water pollution, meanwhile, is monitored on a regular basis through outlet sampling to verify various quality parameters of the effluent and take action if necessary.

#### 3.1 Water consumption

Monitoring water consumption will be the focus of specific initiatives to be carried out in 2026 to gain a better understanding of our usage patterns, with the aim of implementing new water conservation policies.

	2023 (m <sup>3</sup> )	2024 (m <sup>3</sup> )	2025 (m <sup>3</sup> )	Objective 2030 vs. 2025
<b>Water consumption*</b>	ND	52 145	51 325	-10%

*Scope: corporate headquarters, Sagemcom Tunisia, Sagemcom Software and Technologies, Sagemcom MEI, Froschl, Sagemcom China, Sagemcom Haiphong.*

The targets will be reviewed in 2026, with a continued focus on refining the indicators—particularly regarding water withdrawal types and usage—to reduce consumption at the source and assess the feasibility of water recovery and recycling mechanisms.

This review will be conducted through the group’s environmental seminars, which bring together all site representatives, in order to ensure a consistent and coordinated approach.



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# Biodiversity and Ecosystems

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## 1. Actions and resources related to biodiversity and ecosystems

The impact of the Sagemcom Group's activities on biodiversity is assessed as part of the annual environmental review in accordance with the ISO 14001 standard. As such, impacts on water, air, and soil are evaluated annually through an environmental review. The impact on plants, animals, and human habitats is closely monitored. For example, Sagemcom's new headquarters incorporates numerous initiatives to promote biodiversity conservation:

- selecting a real estate development located in an already built-up area, without destroying undeveloped land but instead reusing land of low ecological value,
- a limited number of local wild animals, listed as of least concern,
- greening initiative, with approximately 9% of impervious surfaces planted. Most of the plant species planted are native (more than 70%) and benefit local wildlife (more than 60%), particularly by providing food for pollinators, birds, and other small animals, as well as serving as a refuge, breeding ground, or nesting site,
- installation of additional equipment to promote biodiversity, including birdhouses, insect screens, and low-reflective windows,
- A 400-square-meter flowered fallow field has been created at the Dinan site to promote local biodiversity.

To date, biodiversity has not been considered a material issue for Sagemcom. However, the Group plans to conduct an analysis in the coming years using the GBS (Global Biodiversity Score) methodology, as well as an analysis based on AXA Climate's tools.



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# Resource Use and the Circular Economy

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## 1. Policies on Resource Use and the Circular Economy

The circular economy is now emerging as an essential model for addressing the environmental challenges posed by the overconsumption of resources and the accumulation of waste. In the electronics sector, this approach is of critical importance, as electronic equipment generates millions of tons of waste each year, much of which is poorly recycled. To address this issue, Sagemcom has adopted concrete strategies aimed at extending product lifespans, reducing their environmental impact, and promoting their reuse.

Electronic products, such as internet routers, TV set-top boxes, and smart meters, are made up of many materials, some of which are rare (metals, plastics, chemical components); and their manufacture and use require a certain amount of energy and natural resources. The circular economy aims to limit the environmental impact of this consumption by relying on three key principles: reduce, reuse, recycle.



### 1.1 Sagemcom's Commitment to the Circular Economy

For several years now, Sagemcom has been committed to a proactive circular economy approach, based on a policy centered on several key areas:

- reduce the extraction of natural resources,
- use alternative materials,
- facilitate refurbishment,
- extend the service life,
- manage end-of-life care,
- close the loop.

These principles are set forth 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 Ethics Charter to which Sagemcom’s entire value chain is subject: This Ethics Charter is aligned with the Responsible Business Alliance (RBA) Code of Conduct, which itself is based on international standards.

Recognizing the importance of circularity, the Group has incorporated the use of alternative materials into its mission-driven corporate commitments, setting ambitious goals—particularly regarding the use of alternative materials in its products. Since the use of recycled materials in products often entails additional costs for customers, the Group continues to implement this approach in consultation with customers whenever projects allow.

Sagemcom is also represented on the Board of Directors of Ecologic, an eco-organization accredited 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 Reduce the extraction of natural resources

Sagemcom miniaturizes its products as much as possible to reduce the amount of materials used, by shrinking the size of circuit boards through the use of increasingly integrated components, and by optimizing the space required for thermal management.

Whenever possible and in consultation with its customers, the Group designs its products to enable their reuse (refurbishment): this involves designing them so that their main components can be separated; or, for example, modifying the plastics so that they are less susceptible to scratches, which would otherwise render them unsuitable for reuse.

### 2.2 Use alternative materials

Sagemcom designs its products by incorporating recycled materials into the plastic casings of many of its devices. In 2025, 51% of the plastics used by the Group were post-consumer recycled (PCR) plastics, used primarily in the Group’s set-top boxes and internet routers. These plastics are certified, sourced from controlled recycling channels, and ensure the mechanical and aesthetic performance of the finished products. More specifically within Sagemcom Broadband, over 72% of the plastics come from recycling streams: a rate that has been steadily increasing since 2018, the year in which Sagemcom, in partnership with the Orange Group, pioneered the

use of recycled plastics in its designs within the broadband market. For Sagemcom Energy & Telecom's smart meters, Sagemcom is committed to increasing the use of bio-based and recycled plastics in order to move away from petroleum-based materials.

In terms of metals, Sagemcom has qualified recycled aluminum alloys for use in its heat sinks, drastically reducing the environmental impact associated with the manufacture of its products, while ensuring the traceability of these materials' origin to verify that they are indeed recycled metals. Surface treatments on these parts are eliminated as much as possible, and new solutions are currently being explored to reduce the impact of the materials used in the Group's products—particularly in printed circuit boards and accessories—in order to continue lowering their environmental impact.

Finally, it should be noted that Sagemcom takes care to select materials that are compatible with the recycling process: its products are then assembled in a way that facilitates their disassembly and the separation of their various components.

### 2.3 Facilitate product refurbishment

Sagemcom takes product refurbishment into account from the design phase, ensuring that refurbishment, repair, or remanufacturing is facilitated through reversible assembly methods. This work is carried out in partnership with its customers and refurbishment companies to diagnose and repair products while minimizing the replacement of parts. Detailed instructions (disassembly guides) and specialized tools are provided to the Group's partners to refurbish products as efficiently as possible: this helps prevent the premature disposal of millions of devices.

Drawing on its experience in product design and its partnerships with recyclers, Sagemcom has established a recyclability metric for its products. This metric allows the company to assess the benefits of its design methods, with a focus on end-of-life considerations. It takes several factors into account:

- the materials used,
- assembly techniques,
- the known results of WEEE treatment channels.

This measure is designed to be realistic, with three possible disposal options ranging from refurbishment to direct destruction.

### 2.4 Extend the product lifespan

To reduce the environmental impact of its products, Sagemcom works with its customers to deploy innovative, high-performance solutions that can be upgraded throughout their lifecycle in the field. As a result, a first-gene-

ration internet router designed for the French market was recovered and refurbished to incorporate a new, higher-performance Wi-Fi standard. By reusing a significant portion of the electronics from the previous generation, as well as the plastic casings and product accessories, this new generation has a 58% lower environmental impact compared to a brand-new product.

## 2.5 Manage the end of a product's life-cycle, when this falls under Sagemcom's responsibility

Whenever the Group is responsible for doing so, Sagemcom participates in approved collection systems for the recycling of its products. However, optimizing recycling requires specific consideration of these aspects from the design phase onward—a constant focus at Sagemcom: by ensuring the separability of material fractions to avoid contaminating landfills with incompatible materials; by providing precise disassembly instructions; and by calculating product recyclability to set improvement goals in this area. To encourage the recycling of its end-of-life products, Sagemcom provides recyclers with a disassembly guide upon request. This guide contains all the information needed to ensure the optimal recycling and recovery of the equipment:

- a material inventory (metals, plastics, circuit boards, etc.),
- the location of the components to be separated (in accordance with the WEEE Directive),
- the dismantling steps,
- potential hazards for recycling operators (sharp metal edges, etc.).

### Close the loop

Sagemcom is constantly striving for improvement, to push the boundaries even further. Based on the principle that a used product is a potential resource to be utilized, the Group actively participated in the Neocircuit Router project, conducted in collaboration with Deutsche Telekom and other partners, which demonstrated a concept for the direct reuse of components: components removed from old routers were tested and reassembled into a new design, combined with new components and a circuit board salvaged from old phones to create a functional router. The resulting product achieved an impressive 70% recovery rate of components (by weight), with an estimated reduction in environmental impact of approximately 50%. Although the industrialization 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. As a follow-up to this project, Sagemcom is participating in the Kibartroniks initiative.

## 2.6 Toward a More Responsible Electronics Industry

The example of Sagemcom shows that the transition to a circular economy

in the electronics sector is not only possible but also beneficial for both the environment and business competitiveness. By optimizing the entire product lifecycle, promoting reuse, and reducing waste, industry players like Sagemcom are contributing 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 initiatives are assessed at the product level, for example using the ITU-T L.1023 standard on the circularity of electronic products, thereby enabling the identification of new avenues for improvement related to the reparability and circularity of the Group's solutions. This standard was applied to a representative sample of products, enabling the identification of concrete courses of action.

Sagemcom is committed to significantly increasing its use of recycled materials: as part of its corporate mission objectives, the percentage of recycled materials across all business units is set to reach 45% by 2027.

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

	2021	2022	2023	2024	2025	2026	2027
<b>Objectives</b>	15%	20%	25%	30%	35%	-	-
<b>Group Results</b>	15%	20%	25%	33%	41%	-	-

#### 3.2 Outgoing resources

In line with its status as a mission-driven company and its ISO 14001 certification, the Group is working to manage and reduce waste. Beyond regulatory requirements, partnerships with various service providers have been established to optimize waste reduction at the source and improve recycling channels. Each site sorts its waste streams according to locally available channels. Waste management is a key priority, as Sagemcom aims to reduce its Scope 3 emissions to meet the decarbonization targets set and validated by the SBTi (Science Based Targets) initiative.

In terms of products, Sagemcom is also working to reduce waste at the source, optimize product disassembly, enable remanufacturing, and so on.

Here are a few examples of measures implemented to reduce the amount of waste generated at Sagemcom's factories:

- ship raw materials from local suppliers in returnable plastic containers instead of disposable cardboard boxes,
- tertiary packaging tailored to product families, thereby reducing the use of film and dividers, which leads to a reduction in shipping weight without compromising product protection and safety,
- Elimination of plastic packaging for accessories such as cables, power supplies, heat sinks, enclosures, etc.

Sagemcom also facilitates the recycling of its devices starting from the design phase.

Combinations of different types of materials can affect a device's recyclability. Sagemcom therefore ensures that it selects materials compatible with the recycling process. Its products are then assembled in a way that facilitates disassembly and the separation of their various components.



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# Company headcount

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# 1. Company headcount

## 1.1 HR Policies

### Measures concerning child labor, forced labor, and human trafficking

As part of its comprehensive policy on working conditions, respect for human rights, and environmental protection, Sagemcom is committed to eliminating all practices that violate human rights and to promoting ethical conduct. Accordingly, the Group's Human Resources policy is grounded in a strong commitment to ethics, respect for individuals, and the protection of fundamental rights.



At the heart of Sagemcom's priorities is an absolute ban on child labor, forced labor, and all forms of human trafficking, in accordance with national and international standards. The Group is thus committed to ensuring working conditions that respect human dignity and to promoting the fundamental principles of human rights across all its operations. This approach is accompanied by an active fight against discrimination, through the promotion of equal opportunities as well as diversity and inclusion within its teams. Finally, the Group's human resources policy is based on open and constructive social dialogue, grounded in freedom of expression, freedom of association, and the recognition of collective bargaining—all essential to a climate of trust and lasting commitment.

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

Group's actions in the following areas:

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

The material sustainability issues identified above are addressed by several policies within Sagemcom, implemented by the Group Human Resources Department. In general, the policies described below apply to all employees across all entities. All policies thus apply to all Sagemcom employees, regardless of their work location and the nature of their contract (permanent, fixed-term, work-study, etc.), under the responsibility of the Group Human Resources Director.

## 1.2 Policy on Talent Development and Employee Skills Management

Sagemcom adheres to a “Global Policy on Working Conditions, Respect for Human Rights, and Environmental Protection,” which establishes respect for human rights, the fight against discrimination, social dialogue, professional development, training and skills development, and work-life balance as fundamental principles, forming the foundation of a shared commitment to sustainable, ethical, and socially responsible performance.

This is reinforced by Sagemcom's statutory commitment to the professional development of its employees, which constitutes the fifth pillar of Sagemcom's purpose statement: “supporting our employees in their professional development throughout their time with the Group, drawing in particular on the sharing of our values and the promotion of diversity,” a commitment whose quality, relevance, and authenticity are regularly audited by an independent third party.

### 1.2.1 Supporting and diversifying professional careers within the Group

To support the professional development of its employees and foster their loyalty, Sagemcom implements various initiatives throughout their careers with the Group, offering them rewarding and enriching career paths. These measures foster employee loyalty to Sagemcom. This loyalty is reflected, for example, in the average tenure of employees at the Campus and Group headquarters, which stands at 13 years—a figure that stands out as an exception within the industry.

The publication of a mobility charter serves to outline the Group's policy in this area: mobility fosters creativity and dynamism in our operations, breaks down barriers between departments, and promotes the exchange of experiences and professional backgrounds—all of which contribute to the development of our organization and the men and women who make it up. In

this regard, all available positions are open to internal mobility and communicated to all employees through a job board.

This initiative is complemented by the establishment of recruitment and mobility committees, which are designed, in particular, to facilitate and guide employees' career development within the Group. In addition, France has set a goal of filling one-third of positions through internal mobility. For more than five years, this target has been comfortably met.

In addition, employees have the opportunity to express their interest in mobility—whether within their subsidiary or across the Group, and whether it involves cross-functional, vertical, or geographic moves—during their Individual Performance and Development Review (EIDP) and/or, for employees working in France, during their career development interview. These requests are carefully analyzed by HR teams and shared with managers, who take them into account when designing career paths within the Group. The use of EIDPs is a key objective embedded in Pillar 5 of the Mission-Driven Company, dedicated to supporting our employees in their professional development. It aims to enhance individual fulfillment as well as career paths within the Group. For example, our Brazilian manufacturing site promotes versatility and cross-functional mobility by expanding the tasks assigned to operators and developing their skills.

Sagemcom also supports career diversity by promoting an “Expert” track that runs parallel to the managerial track. This track recognizes the expertise and the acquisition by certain employees of proven specific skills in a key area for the Group. Experts receive recognition for their skills through the sharing of their knowledge and their role in representing the company; in return, the Group capitalizes on and invests in strategic areas of expertise that contribute to its performance (see page 60 – section on the Expert track).

In addition, the Group's strategic priorities are reflected in training catalogs that help identify training needs. These needs are gathered through EIDPs and analyzed by HR teams. They are then implemented across our various subsidiaries as part of skills development plans. Thus, each year, nearly 3% of the total payroll is invested in France to develop our employees' skills.

### **Other initiatives to support career development and training**

In addition, Sagemcom is committed to fostering career development paths within its various professional divisions (R&D, Business, Procurement, etc.). This commitment is reflected, in particular, in the implementation of rigorous training programs that enable employees to progressively develop their skills throughout their careers within the Group. In addition, dedicated training programs list the mandatory and recommended modules for each field, helping employees and their managers, on the one hand, to precisely identify development needs, and on the other hand, to plan for the next steps in their professional development.

## 1.3 Initiatives and resources related to the company's workforce

### 1.3.1 Implementation of an HRIS

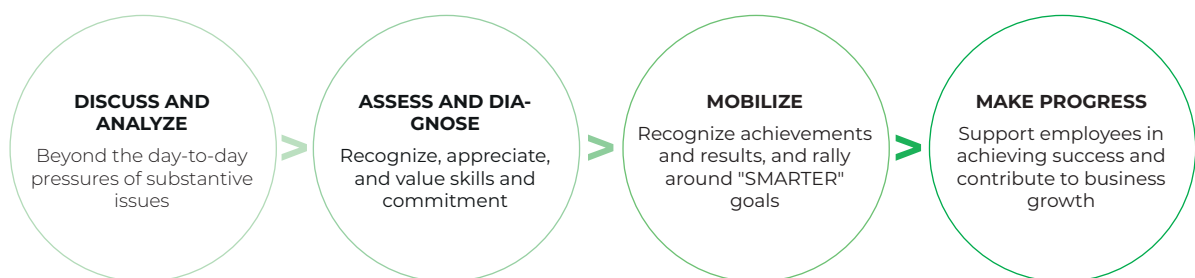
In recent years, Sagemcom has implemented MyHR Solutions, an integrated Human Resources Information System (HRIS) that centralizes and digitizes all human resources functions: employee data management, management of annual performance reviews (EIDP) and professional development reviews, training, career development, recruitment, and compensation.

This new tool centralizes Sagemcom's job and skills database, listing all roles within the Group to provide a comprehensive map of the company's skills. This makes it easier for HR departments, as well as managers and employees, to plan career paths within Sagemcom. An "internal mobility" section empowers everyone to take control of their career mobility, as the application allows each employee to view open positions, apply, and track their application. Additionally, this tool offers the advantage of providing a comprehensive, centralized view of each employee (status, training, evaluation, compensation, etc.), thereby facilitating dynamic and personalized management of career paths within the Group.

### 1.3.2 Drive and support performance, development, and progress

The Individual Performance and Development Review (EIDP), which is effectively centralized in MyHR Solutions, serves as the starting point for building career paths at Sagemcom and is conducted annually across all of the Group's subsidiaries: it is one of the fundamental pillars of Sagemcom's Human Resources policy. Moreover, the completion rate, analysis, and associated action plans for these interviews constitute an objective within the fifth pillar of Sagemcom's mission (see page 84).

The manager, the employee, and the company all stand to benefit from this review, which helps achieve four key objectives in pursuit of a shared goal of individual and collective growth:



These reviews help the Group manage individual and team skills by implementing concrete measures to support employees' professional development (training, individual action plans, career advancement, etc.). In France, all employees also receive a career development review focused on their career advancement prospects, enabling them to actively participate in their professional growth.

The Group continues to systematically analyze and follow up on these discussions with managers in order to define the necessary action plans (skills development through training, career path planning, job mobility, new responsibilities, etc.) to be implemented to support the professional development of its employees.

By 2025, 99% of the EIDPs had been completed; subsequently, 100% of them were analyzed and followed up with managers.

It should also be noted that even unrealized EIDPs are discussed with managers, with the goal of maintaining this trajectory through 2030.

### **Employee Satisfaction Survey**

As part of the EIDP process, an open and constructive dialogue takes place. During this process, each employee is invited to share their level of job satisfaction, covering their work responsibilities, working conditions, and work-life balance.

All of these factors are carefully analyzed, as this annual feedback is considered a valuable source of information comparable to a satisfaction survey. Based on this, individual and collective action plans are then developed and implemented to bring about lasting improvements in working conditions for all employees.

### **1.3.3 Training to develop and refine skills**

Sagemcom views training as an investment in the future, a tool for economic performance, and a major social issue. Furthermore, the ability to identify the skills needed to anticipate future developments and meet the demands of the market and customers is a key factor in competitiveness. Training is therefore a powerful tool for optimizing the potential and performance of the Group's employees.

The training initiatives implemented fall into three complementary categories:

- Workplace accommodations to support employees in their daily activities
- Retaining employees to ensure the long-term mastery of key skills
- Skills development, which accounts for the largest share of the training programs implemented.

This last category, which represents the majority, reflects the Group's commitment to continuously strengthening the expertise and potential of its employees.

The Group therefore makes significant efforts each year to adapt, maintain, and develop its employees' skills. In France, for example, 3% of the total payroll is allocated annually to skills development.

Finally, it should be noted that in 2024, Sagemcom renewed its implementation of a GEPP (Job and Career Path Management) agreement, which specifically designates the Personal Training Account (CPF) as a means for

employees and the company to jointly develop a career plan. Thus, the CPF co-investment program was established to encourage employees to jointly develop training plans that meet Sagemcom's skill needs while contributing to the professional development of its beneficiaries.

In line with its Group policy, Sagemcom ensures that all its employees have equal access to training, free from discrimination. Special attention is also given to employees who have not received training in the past three years: this is an effective and practical way to support the employability and development of all teams throughout their careers.

Across the Group's various subsidiaries, training programs are being implemented to address local contexts and needs. Here again, this initiative is driven by Sagemcom's purpose, which has outlined the framework for three major training categories in 2025: specific safety training for subsidiaries involved in construction site management and supervision; training on non-discriminatory hiring; and environmental protection training through the Fresque du Climat.

#### 1.3.4 Training - GRI Indicator 404 - 1

##### Average number of training hours per employee per year

	Average number of training hours per year per employee	Total number of employees	Total number of hours
2023	11,8	5 894	69 497
2024	9,7	5 569	54 142
2025	8,8	5 666	50 018

##### Average number of training hours per year per employee by socio-professional category and by gender

		Men	Women	Other	Not disclosed
<b>Workers</b>	<b>2023</b>	6,8	2,3	0,0	0,0
	<b>2024</b>	4,6	2,1	0,0	0,0
	<b>2025</b>	7,4	2,2	0,0	0,0
<b>Employees</b>	<b>2023</b>	17,9	20,3	0,0	0,0
	<b>2024</b>	9,9	11,2	0,0	0,0
	<b>2025</b>	11,4	8,3	0,0	0,0
<b>Engineers and executives</b>	<b>2023</b>	15,2	20,2	0,0	0,0
	<b>2024</b>	16,8	18,3	0,0	0,0
	<b>2025</b>	13,7	14,9	0,0	0,0

*These figures do not include e-learning courses, which will be included in this report starting in 2026.*

### 1.3.5 Measuring the quality of training programs

Sagemcom is committed to delivering effective training programs that meet business needs, with the aim of supporting skill adaptation and development. As such, all training programs are subject to both immediate and follow-up evaluations. Conducted as part of the annual performance review, the follow-up evaluation assesses whether the skills acquired during training are being effectively applied in professional practice, as well as their relevance to each employee's role. In the event of a confirmed discrepancy, an analysis is conducted by the HR teams and an action plan is defined to improve the effectiveness of the training programs.

Training catalogs are made available to managers and employees to guide them and help identify skills development needs. In addition, these catalogs outline ambitious training pathways within the various professional fields to support the development of career progression plans within the Group.

### 1.3.6 Launch of an online training platform

The Group Human Resources Department has made the "Smart Academy" available to all Sagemcom subsidiaries—an e-learning platform accessible to everyone. Offering digital modules, most of which are custom-built, this tool enables agile training across the entire Group. The benefits of this system are numerous: expanding the training offering, optimizing resources dedicated to training, personalizing skill development paths, facilitating access to training, and more. The digital training offering has gradually expanded. In addition to

mandatory training (anti-corruption, cybersecurity, etc.), Smart Academy also offers job-specific training.

For example, at our Hungarian R&D subsidiary, skills development is a priority from the moment new employees join the company. Certain e-learning programs have become essential for ensuring the smooth onboarding of new employees, enabling them to learn about our Group, our products, our project management methods, and more. Subsequently, other training programs (including in-person sessions) are implemented based on identified needs to support skills development: open access to an online training platform, job-specific training, language training, and more. This e-learning platform is also a powerful tool for facilitating the onboarding of new employees at Sagemcom.

### 1.3.7 Development and coordination of the Experts program

To maintain the high level of expertise within its teams, Sagemcom continues to develop and promote its Expert track. In fact, to support career diversity, Sagemcom has created an “Experts” track that runs parallel to the managerial track. This track recognizes the expertise and acquisition by certain employees of proven specific skills in a key area for the Group. Experts receive recognition for their skills, particularly through their vital role in disseminating and sharing their knowledge (especially through internal training), in innovation, and also in advising and supporting teams or promoting the Group's reputation. In return, the Group capitalizes on and invests in strategic areas of expertise that contribute to its performance.

Co-led by the R&T; Department and the Group HR Department, an engagement initiative aims to enhance the sector's visibility and foster synergies among the Experts. Various initiatives are being implemented: working groups focused on developing strategic expertise, a comprehensive communication plan to raise awareness and recognition of the Experts within the Group, and various events to bring the Experts together (seminars, regular meetings, Techdays, the “The Experts Have Their Say” interview series), etc.

As of 2025, Sagemcom's Expert track comprises 22 members, divided into three seniority levels: Distinguished Expert (1), Senior Expert (10), and Expert (12); the track has been international since 2020.



## 1.4 Indicators and targets related to the company's workforce - GRI Indicators 2-7

### Total Workforce by Gender and Region

**2023**

Total headcount (employees and other workers) by gender and region	Europe	Africa and the Middle East	America	Asia and Oceania	TOTAL
Men	998	1 987	135	135	<b>3 255</b>
Women	370	2 497	51	81	<b>2 999</b>
Other	0	0	0	0	<b>0</b>
Not disclosed	0	0	0	0	<b>0</b>
<b>TOTAL</b>	<b>1368</b>	<b>4484</b>	<b>186</b>	<b>216</b>	<b>6254</b>

**2024**

Total headcount (employees and other workers) by gender and region	Europe	Africa and the Middle East	America	Asia and Oceania	TOTAL
Men	925	1 833	123	120	<b>3 001</b>
Women	307	2 384	53	74	<b>2 818</b>
Other	0	0	0	0	<b>0</b>
Not disclosed	0	0	0	0	<b>0</b>
<b>TOTAL</b>	<b>1232</b>	<b>4217</b>	<b>176</b>	<b>194</b>	<b>5819</b>

**2025**

Total headcount (employees and other workers) by gender and region	Europe	Africa and the Middle East	America	Asia and Oceania	TOTAL
Men	922	1 901	90	117	<b>3 030</b>
Women	285	2 472	50	73	<b>2 880</b>
Other	0	0	0	0	<b>0</b>
Not disclosed	0	0	0	0	<b>0</b>
<b>TOTAL</b>	<b>1207</b>	<b>4373</b>	<b>140</b>	<b>190</b>	<b>5910</b>

Total Workforce by Contract Type, Gender, and Region

2023

Employees permanent	Europe	Africa and the 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 disclosed	0	0	0	0	0
<b>TOTAL</b>	<b>1138</b>	<b>3724</b>	<b>158</b>	<b>216</b>	<b>5236</b>

2024

Employees permanent	Europe	Africa and the 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 disclosed	0	0	0	0	0
<b>TOTAL</b>	<b>1095</b>	<b>3694</b>	<b>142</b>	<b>194</b>	<b>5125</b>

2025

Employees permanent	Europe	Africa and the Middle East	America	Asia and Oceania	TOTAL
Men	777	1 841	67	112	2 797
Women	255	2 372	37	69	2 733
Other	0	0	0	0	0
Not disclosed	0	0	0	0	0
<b>TOTAL</b>	<b>1032</b>	<b>4213</b>	<b>104</b>	<b>181</b>	<b>5530</b>

## 2023

Employees temporary	Europe	Africa and the 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 disclosed	0	0	0	0	0
<b>TOTAL</b>	<b>7</b>	<b>651</b>	<b>0</b>	<b>0</b>	<b>658</b>

## 2024

Employees temporary	Europe	Africa and the 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 disclosed	0	0	0	0	0
<b>TOTAL</b>	<b>3</b>	<b>437</b>	<b>4</b>	<b>0</b>	<b>444</b>

## 2025

Employees temporary	Europe	Africa and the Middle East	America	Asia and Oceania	TOTAL
Men	2	23	18	5	48
Women	0	73	11	4	88
Other	0	0	0	0	0
Not disclosed	0	0	0	0	0
<b>TOTAL</b>	<b>2</b>	<b>96</b>	<b>29</b>	<b>9</b>	<b>136</b>

## 2023

Other workers (temporary workers, contractors, interns, self-employed individuals, subcontractors, etc.)	Europe	Africa and the Middle East	America	Asia and Oceania	TOTAL
Men	152	59	25	0	<b>236</b>
Women	71	50	3	0	<b>124</b>
Other	0	0	0	0	<b>0</b>
Not disclosed	0	0	0	0	<b>0</b>
<b>TOTAL</b>	<b>223</b>	<b>109</b>	<b>28</b>	<b>0</b>	<b>360</b>

## 2024

Other workers (temporary workers, contractors, interns, self-employed individuals, subcontractors, etc.)	Europe	Africa and the Middle East	America	Asia and Oceania	TOTAL
Men	106	50	18	0	<b>174</b>
Women	28	36	12	0	<b>76</b>
Other	0	0	0	0	<b>0</b>
Not disclosed	0	0	0	0	<b>0</b>
<b>TOTAL</b>	<b>134</b>	<b>86</b>	<b>30</b>	<b>0</b>	<b>250</b>

## 2025

Other workers (temporary workers, contractors, interns, self-employed individuals, subcontractors, etc.)	Europe	Africa and the Middle East	America	Asia and Oceania	TOTAL
Men	143	37	5	0	<b>185</b>
Women	30	27	2	0	<b>59</b>
Other	0	0	0	0	<b>0</b>
Not disclosed	0	0	0	0	<b>0</b>
<b>TOTAL</b>	<b>173</b>	<b>64</b>	<b>7</b>	<b>0</b>	<b>244</b>

## 2023

Hourly employees without guaranteed hours	Europe	Africa and the 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 disclosed	0	0	0	0	0
<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

## 2024

Hourly employees without guaranteed hours	Europe	Africa and the 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 disclosed	0	0	0	0	0
<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

## 2025

Hourly employees without guaranteed hours	Europe	Africa and the 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 disclosed	0	0	0	0	0
<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Total workforce by contract duration, gender, and region

2023

Full-Time	Europe	Africa and the 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 disclosed	0	0	0	0	0
<b>TOTAL</b>	<b>1 324</b>	<b>4 483</b>	<b>176</b>	<b>216</b>	<b>6 199</b>

2024

Full-Time	Europe	Africa and the Middle East	America	Asia and Oceania	TOTAL
Men	909	1 832	116	120	2 977
Women	281	2 384	53	74	2 792
Other	0	0	0	0	0
Not disclosed	0	0	0	0	0
<b>TOTAL</b>	<b>1 190</b>	<b>4 216</b>	<b>169</b>	<b>194</b>	<b>5 769</b>

2025

Full-Time	Europe	Africa and the Middle East	America	Asia and Oceania	TOTAL
Men	904	1 900	85	117	3 006
Women	262	2 472	48	73	2 855
Other	0	0	0	0	0
Not disclosed	0	0	0	0	0
<b>TOTAL</b>	<b>1 166</b>	<b>4 372</b>	<b>133</b>	<b>190</b>	<b>5 861</b>

## 2023

Part-Time	Europe	Africa and the Middle East	America	Asia and Oceania	TOTAL
Men	15	1	8	0	24
Women	29	0	2	0	31
Other	0	0	0	0	0
Not disclosed	0	0	0	0	0
<b>TOTAL</b>	<b>44</b>	<b>1</b>	<b>10</b>	<b>0</b>	<b>55</b>

## 2024

Part-Time	Europe	Africa and the 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 disclosed	0	0	0	0	0
<b>TOTAL</b>	<b>42</b>	<b>1</b>	<b>7</b>	<b>0</b>	<b>50</b>

## 2025

Part-Time	Europe	Africa and the Middle East	America	Asia and Oceania	TOTAL
Men	18	1	5	0	24
Women	23	0	2	0	25
Other	0	0	0	0	0
Not disclosed	0	0	0	0	0
<b>TOTAL</b>	<b>41</b>	<b>1</b>	<b>7</b>	<b>0</b>	<b>49</b>

Number of employees who took an EIDP by gender and socio-professional category - Indicator 404 - 3

		Number of workers	Number of EIDP workers	Number of employees	Number of EIDP employees	Number of engineers and managers	Number of EIDP engineers and managers	Total number of employees	Total number of EIDPs
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 disclosed	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 disclosed	0	0	0	0	0	0	0	0
2025	Men	530	46	900	360	1 415	1 386	2 845	1 792
	Women	1 796	44	403	222	622	609	2 821	875
	Other	0	0	0	0	0	0	0	0
	Not disclosed	0	0	0	0	0	0	0	0

		Men	Women	Other	Not disclosed
Workers	2023	6%	2%	0%	0%
	2024	4%	1%	0%	0%
	2025	9%	2%	0%	0%
Employees	2023	37%	59%	0%	0%
	2024	40%	57%	0%	0%
	2025	40%	55%	0%	0%
Engineers and executives	2023	97%	95%	0%	0%
	2024	98%	97%	0%	0%
	2025	98%	98%	0%	0%
TOTAL	2023	62%	31%	0%	0%
	2024	63%	30%	0%	0%
	2025	63%	31%	0%	0%

## Number of hours worked

	Employees			Other workers		
	2023	2024	2025	2023	2024	2025
Group Total	11 205 532,82	9 979 002,46	9 905 448,33	795 647,53	356 043,00	202 618,00

## 2. Social dialogue and collective bargaining

### 2.1 Policy on Social Dialogue and Collective Bargaining

#### 2.1.1 Social dialogue as a vehicle for sustainable social support

Labor relations within the Sagemcom Group are the responsibility of the managers at each site in the various countries where the Group operates, in coordination with the Group Human Resources Department. In some countries, a structured social dialogue is established through regulated bodies (for example, in Tunisia and France). Negotiations are held with representative labor unions within the Group's legal entities on matters of labor policy.

As such, Sagemcom is committed to finding, through social dialogue, the best balance between the company's needs and the interests of its employees, in order to best support the growth of its business and the people who contribute to it.

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

### 2.2 Examples of initiatives and resources related to social dialogue and collective bargaining

#### 2.2.1 In France

The Works Council in France consists of 28 employee representatives. It was reappointed in 2022 for a four-year term.

In 2025, 18 meetings were held: during these meetings, topics related to Sagemcom's current affairs were presented, covering strategic, financial, environmental, and social issues.

At the corporate level, 2025 was marked in particular by the signing of an agreement on diversity and inclusion. The agreement outlines innovative measures regarding equal access to employment, compensation policies and pay equity, career development, employment retention for employees with disabilities, and work-life balance.

Work also continued on implementing the various agreements and action

plans currently in place (strategic workforce planning and career development, psychosocial risk prevention plan, work-life balance, telework, etc.). These are the subject of a specific communication in the “Social Dialogue” section of the intranet, allowing employees to consult them at any time, and of an annual review, during which potential adjustments and progress made are shared within the framework of a joint monitoring committee.

### 2.2.2 In Tunisia

The past few years have been marked by a particularly fruitful social dialogue. Taking into account lessons learned from the health crisis, Sagemcom’s subsidiary SS&T (an R&D center in Tunisia) was the first Tunisian company to negotiate and sign a telework agreement with the grassroots union, including the establishment of a monitoring committee, a sign of a robust and open social dialogue.

Social dialogue at Sagemcom takes many forms. Beyond the essential dialogue with employee representative bodies, it is also an integral part of the day-to-day relationship between employees and management. It is a cornerstone of the Group’s culture of dialogue.

Throughout the year, key events mark the company’s calendar, providing all employees with transparent information on financial results, major achievements, and strategic outlooks. Twice a year, direct discussions are held with senior management. These special occasions give employees the opportunity to ask questions of executives, better understand the company’s direction, and voice their concerns or suggestions.

In addition, quarterly meetings are held between senior management and line managers. These meetings are designed to ensure consistent implementation of the short-term strategy, while allowing managers to internalize key messages and provide feedback from the field.

In addition to these institutional mechanisms, social dialogue takes place on a daily basis through regular team meetings, which facilitate the exchange of information, the coordination of actions, and the sharing of ideas. One-on-one meetings between managers and employees further strengthen this dynamic by fostering close supervision, personalized support, and active listening to each individual’s needs and expectations.

As such, Sagemcom is committed to fostering a strong and transparent dialogue with employees at all levels of the organization.

#### **Other measures implemented to promote structured social dialogue**

Furthermore, to promote constructive, transparent, and sustainable social dialogue, Sagemcom ensures that the procedures and employee representative bodies are adapted to organizational needs and specific contexts. Thus, when the situation requires it, ad hoc joint committees may be formed to facilitate communication with employee representatives. This was parti-

cularly the case during the COVID-19 health crisis, a period during which a dedicated weekly committee was established to regularly monitor the impacts of the crisis and strengthen coordination with employee representatives.

In France, a special committee has also been established to support and monitor progress on the job classification system under the new collective bargaining agreement for the metalworking industry. This body has facilitated a structured and ongoing dialogue on developments affecting job classification and career paths.

In addition, Sagemcom fully integrates employee engagement into the management of its strategic projects. To this end, an employee representative serves on the Mission Committee alongside members of senior management and other employees. This participation ensures both that employees have a direct voice within this strategic body and that the company's mission-related commitments are communicated consistently.

### 2.3 Indicators and targets related to social dialogue and collective bargaining - GRI Indicator 2 - 30

	MEN	WOMEN	OTHER**	NO PRESS RELEASE	TOTAL
Total number of employees as of December 31 (excluding "Other workers")	2845	2821	0	0	5666
Number of employees covered by collective bargaining agreements (excluding "Other workers")	2583	2707	0	0	5290
		<b>2023</b>	<b>2024</b>	<b>2025</b>	
Total number of employees as of December 31 (excluding "Other workers")		5894	5569	5666	
Number of employees covered by collective bargaining agreements (excluding "Other workers")		5437	5139	5290	
% of employees covered by collective bargaining agreements		92,2%	92,3%	93,4%	

## 3. Diversity and Inclusion (D&I)

### 3.1 Diversity and Inclusion Policy

Diversity is one of the fundamental principles set forth in the “Sagemcom Global Policy on Working Conditions, Respect for Human Rights, and Environmental Protection.” Sagemcom’s goal is to foster a positive team environment, encourage individual development and innovation, while ensuring respect for differences: the mix of backgrounds and experiences is an integral part of the Sagemcom Group’s culture. In every country, the Sagemcom Group’s subsidiaries therefore aim to ensure that their teams reflect the diversity of the societies around them.

The fifth pillar of Sagemcom’s purpose reflects the Group’s commitment to this cause, enabling it to track concrete metrics that are subject to regular third-party audits (see page 7 on the mission-driven company).

### 3.2 Diversity and Inclusion Initiatives and Resources

#### 3.2.1 Preventing discrimination, sexist behavior, and sexual harassment

##### Measures to Prevent Harassment in the Workplace

As part of its strong commitment to diversity, inclusion, and the prevention of harassment, Sagemcom is implementing several key initiatives designed to ensure a respectful, safe, and equitable work environment.

On the one hand, the company is rolling out two key programs on a company-wide basis: “Recruiting Without Discrimination” and “Preventing Sexist Behavior and Sexual Harassment.”

The first training program, focused on preventing all forms of discrimination during the hiring process and, more broadly, throughout an employee’s career, has been made mandatory across all our subsidiaries. It is fully aligned with our commitments as a mission-driven company and contributes significantly to fostering a culture of diversity and inclusion across the Group. In 2025, the year it was rolled out to all our entities, the completion rate reached 86 %. The goal set for 2026 is to complete this rollout in order to achieve a completion rate close to 100 %.

The second training program, focused on preventing sexist behavior and sexual harassment, was initially launched in France as part of a pilot phase. This mandatory program has three complementary objectives : to ensure a respectful and safe work environment, to promote equality and inclusion, and to strengthen the corporate culture. Completed by 93% of French employees, this training was very well received and helped reaffirm and promote the values of respect, inclusion, and kindness within the company. By 2026, it will be rolled out across all of the Group’s subsidiaries.

Sagemcom's commitment to diversity and inclusion is also reflected in the implementation of other preventive measures.

A guide is provided to everyone involved in the hiring process to prevent any discrimination in hiring, and several agreements reached with labor and management ensure a career path and professional development free from any discrimination (equal pay, equitable access to training, career advancement, and internal mobility).

### **Remedial Procedures for Victims of Discrimination and Harassment**

In addition to these preventive measures, Sagemcom has a clear procedure for addressing cases of discrimination, sexist behavior, or psychological or sexual harassment. Any confirmed incident automatically triggers a joint, impartial, and adversarial investigation, followed by appropriate measures (precautionary measures, disciplinary sanctions, etc.). The internal regulations precisely define inappropriate behavior as well as the applicable sanctions.

Finally, to ensure prompt and accessible support, several reporting channels are available: designated liaisons from management and employee representatives, as well as a neutral hotline open to all employees.

### **Other initiatives to promote the inclusion of minority and vulnerable groups in the workplace**

In addition, in 2025 the company joined the #StOpE initiative, which is dedicated to combating everyday sexism and harassment in the workplace, thereby reaffirming its commitment to these issues and to developing new awareness-raising initiatives each year.

### **3.2.2 Celebrating our cultural diversity**

Sagemcom has nearly 6,500 employees spread across some 40 countries worldwide, representing a variety of cultures. The multicultural nature of the Group's workforce serves as a powerful driver of talent diversity, innovation, collaboration, and competitiveness, which Sagemcom leverages to its advantage. United by the Group's shared values, Sagemcom is committed to supporting its employees by offering specialized training designed to equip them with the tools to understand and optimize collaboration among members of multicultural teams.

Supporting internationalization is a key focus of the Group's skills development plan. As such, many employees receive support through intercultural training programs tailored to the main countries where the Group operates (Tunisia, France, Germany, China, Brazil, Hungary, etc.). These specialized training programs provide the tools needed to optimize collaboration among members of multicultural teams. When Sagemcom establishes a presence in a new country, enhanced intercultural support is also offered to the em-

ployees involved, as well as to their spouses if applicable. This program was notably implemented during the Group's recent expansion into Vietnam.

### 3.2.3 Promote and encourage diversity in all its forms

Sagemcom views the diversity of its workforce as a source of innovation, enrichment, and performance. For our employees, working in an environment that promotes diversity and inclusion enables everyone to reach their full potential while actively contributing to the Group's performance.

Diversity is one of the fundamental principles set forth in the Group's "Sagemcom Global Policy on Working Conditions, Respect for Human Rights, and Environmental Protection." Sagemcom's goal is to foster a positive team environment, encourage individual development and innovation, while ensuring respect for differences and the diversity of backgrounds and experiences. In every country, Sagemcom's subsidiaries strive to ensure that their teams reflect the diversity of the surrounding communities.

The fifth pillar of Sagemcom's purpose reflects this commitment, enabling the company to track concrete metrics that are subject to regular third-party audits (see page 5 on the mission-driven company).

Over the past five years, more than 100 employees have completed "intercultural" training courses. This policy reflects Sagemcom's commitment to promoting and encouraging diversity in all its forms.

### 3.2.4 Equality in the Workplace

Promoting professional equality between women and men is one of Sagemcom's key diversity challenges. In a traditionally male-dominated industry, the goal is to make gender diversity a reality at all levels of the company. While the proportion of women in the workforce continues to rise, now reaching 48%, significant efforts are still needed, particularly in technical roles or positions of responsibility. This need is all the more pressing given that our Executive Committee currently includes no women, and the Group Management Committee includes only 8%. Conversely, Sagemcom's R&D center in Tunisia stands out as an encouraging example: it has achieved near-parity with 43% women, a result driven in particular by strong recruitment momentum in 2024, a year in which 52% of new hires were women.

To attract women with backgrounds in technical or technological fields to its French subsidiaries, Sagemcom has been a member of the partner association "Elles Bougent" for several years. This association works to encourage young women to pursue studies in science, a field that is generally more popular among men. Alongside this association, Sagemcom also develops initiatives to promote the representation of women in scientific fields, for example by regularly highlighting profiles and role models of the Group's female engineers in the Group's various communication channels or at external events.

Committed to diversity, Sagemcom is also dedicated to setting an example in terms of pay equity between women and men. To this end, various measures have been implemented to prevent pay disparities. For instance, a pay analysis based on scatter plots is conducted during external hiring or internal transfers. In the event of an unjustified pay gap, a pay adjustment is made. Additionally, maternity leave periods are given special attention and are factored out to ensure pay equity (minimum average pay increase, adjustment of targets for employees eligible for bonuses, etc.).

Sagemcom has decided to gradually roll out the gender equality index across its international subsidiaries, even though this measure is legally required only in France. The initiative aims to prevent potential pay gaps between women and men and to guide compensation policy accordingly. This initiative is one of the indicators tracked as part of the Group's mission: since 2023, this indicator has been implemented in our R&D and manufacturing subsidiaries in Tunisia and China. Its rollout will continue in 2026.

Recognizing that professional equality between women and men is a driver of collective performance, Sagemcom has continued its awareness-raising efforts aimed at changing the mindsets and behaviors of everyone: female and male employees, students, the educational community, partners, and others. Thus, in France, to take this initiative even further and give it a more structured framework, Sagemcom has been governed for several years by a company-wide agreement covering six areas of action to promote diversity: the sustainable integration of diversity into the Group's culture, access to employment, compensation and pay equity policies, career development, the retention of employees with disabilities, and the pursuit of a work-life balance.

With this agreement, developed jointly with senior management and labor unions, this is not Sagemcom's first attempt. Sagemcom's commitment had already been demonstrated as early as 2016 with the signing of separate agreements on gender equality in the workplace, as well as on combating discrimination, employment, and the integration of people with disabilities. The review conducted following these agreements highlighted significant progress and the importance of pooling synergies to work together on issues that advance a common cause: placing diversity at the center of our priorities.

True to its values, Sagemcom demonstrates its commitment to supporting parenthood, believing that fulfilled parents are employees who are engaged and dedicated to their work. Accordingly, at its Tunisian plants, management has unilaterally implemented a policy of continued salary payments for women throughout their maternity leave, in addition to existing legal provisions. To raise awareness of this flagship initiative, particularly at the industrial sites in Tunis, maternity preparation workshops are offered to eligible women during a dedicated day. On this occasion, various types of support are provided: advice on pregnancy care, breastfeeding, and gentle exercise, participation in prenatal yoga workshops, and more. Because professional equality concerns both women and men, this support for parenthood is also reflected in Sagemcom's

commitments to paternity. From now on, employees at headquarters can take extended paternity leave while retaining their full salary.

### 3.2.5 Combating all forms of discrimination

Sagemcom believes that a policy promoting diversity must also help prevent and firmly combat all forms of discrimination, in order to make diversity a key driver of its performance. This policy involves, in particular, the objectification of all human resources management processes (recruitment, compensation, training, career development, etc.). It also involves promoting affirmative action aimed at ensuring similar working conditions and career paths for all.

The Group has reaffirmed its commitment to combating discrimination by becoming one of the very first companies to join the “À compétence égale” association. Committed to combating all forms of discrimination in hiring and career advancement, the association supports Sagemcom in auditing its recruitment processes and tools and in providing resources and tools, with a focus on continuous improvement.

In addition, Sagemcom is a signatory to the “Equal opportunities” charter, thereby clearly affirming its commitment to actively combating discrimination in all its forms at every stage of the recruitment process and throughout employees’ careers. There are nearly thirty grounds for discrimination, such as discrimination based on gender, age, origin, or related to sexual orientation or gender identity. In the latter case, for example, Sagemcom makes it a point of honor to promote diversity and inclusion for all, including LGBT+ individuals.

With the support of “À compétence égale,” Sagemcom has produced the guide “Putting Your Recruitment Expertise to Work for Greater Equal Opportunities,” which helps shed light on discriminatory situations that are too often overlooked or dismissed as trivial, enabling everyone to adopt appropriate behaviors.

In 2025, Sagemcom continued to roll out its “Recruiting Without Discrimination” training program, the implementation of which is one of the Group’s mission indicators. Completion of this training is now a mandatory requirement for anyone involved in the recruitment process. Failure to do so means that individuals are not authorized to submit recruitment requests or participate in the recruitment process

### 3.2.6 A diverse age mix: a driver of performance

Age diversity within the Group is also a major issue. Depending on business lines, work environments, and local contexts, our Group is characterized by significant age diversity. While the average age across Sagemcom is 37, a quarter of our employees are 30 or younger. Furthermore, disparities are observed among employees aged 60 and older: although this age group represents 2% of the Group’s total workforce, it accounts for 10% of the workforce in France. It is therefore essential to pay close attention to the age distribution, as well as

to preparing for changes in the job market and generational turnover. In this regard, numerous initiatives have been implemented in recent years, particularly in collaboration with the education sector, to promote the recruitment of young people. Between 2016 and 2025, as part of our growth strategy, the number of young employees (up to age 30) in France has grown significantly, rising from 9% to 25%.

However, this challenge must not be met at the expense of older employees. Sagemcom intends to continue its policy of retaining and supporting the career development of all its employees. As part of its agreement on employment and career path management (GEPP), the Group reaffirms its commitment to retaining older employees, particularly through the hiring of older employees, internal mobility, training, and other tailored initiatives.

### **3.2.7 Integration and retention of people with disabilities in the workforce**

The integration and retention of employees with disabilities in the workforce is another major challenge for the Group. The difficulties in recruiting employees with disabilities, given the Group's ambitions and initiatives in this area, reflect a lack of qualifications and vocational training. Nevertheless, the Group remains committed to welcoming all talent and providing the best possible support to employees with specific needs. To this end, initiatives are being implemented to support the integration and retention of people with disabilities in the workforce.

In France, the diversity agreement highlights the measures taken to promote the sustainable integration of employees with disabilities. It also provides for working conditions that support career development and job retention, encourages subcontracting with sheltered and adapted workplaces, and supports employees who care for a family member with a disability. A few examples illustrate these commitments: for instance, all job postings published in France include the statement "Sagemcom, a disability-friendly company," and it is worth noting that employees with disabilities have been able to remain in their jobs thanks to the implementation of special arrangements alternating between remote work and on-site work. Additionally, paid leave days are granted to employees with disabilities to complete administrative procedures related to their disability (in this regard, 21 days of paid leave were recorded in France in 2025).

### **3.2.8 Encouraging career interest and promoting equal opportunities**

Many initiatives are being undertaken locally to build bridges between the worlds of education and work. The goal is to promote diversity and equal opportunities and to contribute to a diverse age mix within the Group. For nearly fifteen years, the Group has supported Article 1, an organization that helps young people from disadvantaged backgrounds enter the workforce: the Group is one of its key long-standing partners. In 2025 in France, about ten employee volunteers dedicated their time to supporting young people through Article

It's various programs. This commitment is also reflected in financial support to help the organization carry out these initiatives.

The Group has also been actively involved in a partnership with the Elles Bougent association, which began in 2020, aimed at promoting science and technology studies among young middle and high school girls. In this context, the Group is working to raise awareness among young women about scientific studies, noting that they are underrepresented in the engineering schools that are sought after to attract top talent and promote diversity.

The Tunisian subsidiaries have also launched various initiatives to support people in need. At the manufacturing sites, a social committee was established several years ago. This committee was allocated a budget provided by management to support employees in need and address unforeseen circumstances. Charity campaigns such as "200 Backpacks for 200 Schoolchildren" and "100 Baskets for 100 Families" have also raised funds to distribute school supplies and food baskets to underprivileged families. For the past decade, employees at the Tunisian R&D center have shown great generosity in supporting this initiative promoting equal opportunities. Headquarters has also implemented several initiatives in this vein. In particular, it mobilized its employees to participate in the "Foulée du Cortex," a race designed to raise funds for the Brain Institute. Additionally, it partnered with a client to take part in the "Street Child Charity Event," a charity dinner aimed at supporting children living on the streets.

### 3.2.9 Diversity and Inclusion Indicators - GRI Indicator 401 - 1

#### Total number of employees by age group and gender

		MEN	WOMEN	OTHER	NO PRESS RELEASES	TOTAL
<b>Under 25</b>	2023	145	125	0	0	<b>270</b>
	2024	96	88	0	0	<b>184</b>
	2025	126	98	0	0	<b>224</b>
<b>AGES 25 TO 35</b>	2023	1 012	1 596	0	0	<b>2 608</b>
	2024	877	1 398	0	0	<b>2 275</b>
	2025	874	1 324	0	0	<b>2 198</b>
<b>AGES 36 TO 45</b>	2023	1 284	945	0	0	<b>2 229</b>
	2024	1 215	1 015	0	0	<b>2 230</b>
	2025	1143	1100	0	0	<b>2 243</b>
<b>AGES 46 TO 55</b>	2023	383	158	0	0	<b>541</b>
	2024	450	186	0	0	<b>636</b>
	2025	529	239	0	0	<b>768</b>
<b>AGES 56 TO 65</b>	2023	192	49	0	0	<b>241</b>
	2024	181	51	0	0	<b>232</b>
	2025	172	58	0	0	<b>230</b>
<b>&gt; AT 65</b>	2023	4	3	0	0	<b>7</b>
	2024	11	1	0	0	<b>12</b>
	2025	2	1	0	0	<b>3</b>
<b>TOTAL</b>	2023	<b>3 020</b>	<b>2 876</b>	<b>0</b>	<b>0</b>	<b>5 896</b>
	2024	<b>2 830</b>	<b>2 739</b>	<b>0</b>	<b>0</b>	<b>5 569</b>
	2025	<b>2 846</b>	<b>2 820</b>	<b>0</b>	<b>0</b>	<b>5 666</b>

#### Breakdown of total hires by gender

	MEN	WOMEN	OTHER	NO PRESS RELEASES	TOTAL
<b>2023</b>	361	304	0	0	<b>665</b>
<b>2024</b>	190	207	0	0	<b>397</b>
<b>2025</b>	358	430	0	0	<b>788</b>

## Breakdown of new hires by region

	Breakdown of total hires by region (number)		
	2023	2024	2025
<b>Europe</b>	121	90	99
<b>Africa and the Middle East</b>	472	291	662
<b>The Americas</b>	59	13	20
<b>Asia and Oceania</b>	13	3	7
<b>TOTAL</b>	<b>665</b>	<b>397</b>	<b>788</b>

## Breakdown of total hires by age group and gender

		MEN	WOMEN	OTHER	NO PRESS RELEASES	TOTAL
<b>Under 25</b>	2023	64	33	0	0	<b>97</b>
	2024	24	17	0	0	<b>41</b>
	2025	72	46	0	0	<b>118</b>
<b>AGES 25 TO 35</b>	2023	214	232	0	0	<b>446</b>
	2024	114	151	0	0	<b>265</b>
	2025	195	258	0	0	<b>453</b>
<b>AGES 36 TO 45</b>	2023	70	34	0	0	<b>104</b>
	2024	41	34	0	0	<b>75</b>
	2025	50	67	0	0	<b>117</b>
<b>AGES 46 TO 55</b>	2023	13	5	0	0	<b>18</b>
	2024	10	4	0	0	<b>14</b>
	2025	34	45	1	0	<b>79</b>
<b>AGES 56 TO 65</b>	2023	0	0	0	0	<b>0</b>
	2024	0	1	0	0	<b>1</b>
	2025	7	14	0	0	<b>21</b>
<b>&gt; AT 65</b>	2023	0	0	0	0	<b>0</b>
	2024	1	0	0	0	<b>1</b>
	2025	0	0	0	0	<b>0</b>
<b>TOTAL</b>	2023	361	304	0	0	<b>665</b>
	2024	190	207	0	0	<b>397</b>
	2025	358	430	1	0	<b>788</b>

## Turnover rate

	2023	2024	2025
<b>Total Turnover Rate</b>	10,6%	9,9%	15,5%
<b>Turnover rate by gender</b>			
	2023	2024	2025
Men	11,3%	8,7%	11,2%
Women	9,9%	11,0%	19,9%
Other	0,0%	0,0%	0,0%
Not disclosed	0,0%	0,0%	0,0%
<b>Turnover rate by region</b>			
	2023	2024	2025
Europe	11,0%	9,5%	8,4%
Africa and the Middle East	10,3%	10,0%	17,9%
The Americas	26,1%	17,5%	13,8%
Asia and Oceania	7,4%	2,8%	3,4%
<b>TOTAL</b>	<b>10,6%</b>	<b>9,9%</b>	<b>15,5%</b>

Percentage of senior executives recruited from the local community -  
GRI Indicator 202-2

Indicator 202-2 percentage of senior executives recruited from the local community	Existence of a policy to promote the hiring of local employees	Total number of senior executives in the subsidiary	Number of local senior managers at the subsidiary	Percentage of senior executives recruited from the local community
<b>Sagemcom UES (Broadband France and Energy &amp; Telecom France)</b>	2023	12	12	<b>100%</b>
	2024	12	12	<b>100%</b>
	2025	13	13	<b>100%</b>
<b>Sagemcom Multi Energy Industry</b>	2023	5	5	<b>100%</b>
	2024	5	5	<b>100%</b>
	2025	5	5	<b>100%</b>
<b>Sagemcom Brazil Telecommunications, LLC</b>	2023	5	5	<b>100%</b>
	2024	5	5	<b>100%</b>
	2025	5	5	<b>100%</b>
<b>Sagemcom (Tianjin) Co., Ltd.</b>	2023	9	8	<b>89%</b>
	2024	9	8	<b>89%</b>
	2025	9	8	<b>89%</b>
<b>Sagemcom Fröschl GmbH</b>	2023	1	1	<b>100%</b>
	2024	1	1	<b>100%</b>
	2025	1	1	<b>100%</b>
<b>Sagemcom Dr. Neuhaus GmbH</b>	2023	4	4	<b>100%</b>
	2024	4	4	<b>100%</b>
	2025	4	4	<b>100%</b>
<b>Sagemcom Hungary Electronics Kft.</b>	2023	1	1	<b>100%</b>
	2024	1	1	<b>100%</b>
	2025	1	1	<b>100%</b>
<b>Sagemcom Software &amp; Broadband Technology LLC</b>	2023	12	11	<b>92%</b>
	2024	8	7	<b>88%</b>
	2025	8	7	<b>88%</b>
<b>Sagemcom Tunisie SARL (including Sagemcom Services Tunisie SARL)</b>	2023	11	7	<b>64%</b>
	2024	10	7	<b>70%</b>
	2025	10	8	<b>80%</b>

## Pillar 5 - Mission-Driven Companies: 2025 Indicators

Operational objectives	Indicators	2024	2025	Trajectory
Promote professional development	EIDP rates analyzed and utilized	EIDP completed: 98% EIDPs analyzed: 100% EIDPs in use: 97%	EIDP completed: 98% EIDPs analyzed: 100% EIDPs in use: 100%	100% of EIDP projects completed, analyzed, and implemented by 2025, with this level maintained through 2030
	Pay Equity for Women and Men	France: 92.5 SST: 95% (2022 and 2023) China: 77.5%	France: 92.5% (87% complete index) SST: 95% China: 77.5% Pass rate: 92.5%	2023: SST 2024: China 2025: STC to remain in place through 2030
Promoting diversity and equal opportunities within a committed community	Number of community-building and/or unifying events supported by the Group	15 events held	13 events held	20 events per year through 2030
	Percentage of personnel involved in the recruitment process who have been trained in "Recruiting Without Discrimination" (France: managers and employees; International: managers)	France: 100% Hungary: 100% USA: 50% Vietnam: 100%	Group: 86%	100% by 2030

## 4. Compensation, social security, and living wages

### 4.1 Policies on compensation, social protection, and living wages

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

### **Percentage of direct employees covered by a living wage benchmark analysis**

Sagemcom is committed to ensuring that every employee receives compensation that covers basic daily needs, supports participation in social life, and allows them to look to the future with confidence. This compensation level has been determined based on local benchmarks that are regularly updated to ensure they are precisely aligned with the economic realities of each geographic region. As a result, 100% of employees currently benefit from this.

### **Other measures implemented to narrow the gap in terms of a living wage**

In addition, some of the Group's subsidiaries offer bonuses that significantly increase employees' compensation; these bonuses are part of a value-sharing program and/or include benefits such as contributions toward meal costs, transportation, and education, which substantially improve employees' purchasing power and quality of life.

Specifically, each of our subsidiaries receives an annual budget for payroll increases allocated to it; these increase budgets are developed and determined based on local benchmarks specific to our business activities and sectors, and are consistently higher than projected inflation rates and anticipated or applicable regulatory and/or contractual changes in this area.

These budgeted increases are then translated into an annual compensation policy (base salary increases), which are subject to:

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

### **Communication to all employees regarding the compensation process**

To ensure an objective, fair, and transparent allocation of the salary increase budget, a guidance memo is systematically sent to managers responsible for formulating individual salary adjustment proposals. This document provides a framework for the entire process : it specifies the criteria for awarding raises, reiterates the fundamental principles of equal pay, fair treatment, and non-discrimination, and details the rules to be followed to ensure consistent and responsible decision-making. By providing this framework, Sagemcom ensures that managerial practices are harmonized, minimizes the risk of bias, and offers employees greater transparency regarding salary progression.

## **Variable compensation plan linked to company performance**

Sagemcom has a variable compensation plan designed to recognize performance in a fair and transparent manner. Approximately 15% of employees are eligible for this program based on their role. The calculation of the corresponding bonus is based on a combination of collective and individual objectives, defined according to measurable and verifiable criteria and communicated to the employees concerned. This system helps align individual performance with the company's strategic and operational priorities, while upholding the principles of integrity, non-discrimination, and fair treatment. The program is designed to encourage continuous improvement and sustainable performance. If targets are significantly exceeded, beneficiaries may receive a bonus exceeding 100% of the target amount, up to a maximum of 200%, in accordance with the company's internal rules and responsible compensation practices.

## **4.2 Action on compensation, social protection, and living wages**

### **4.2.1 Health insurance coverage, with the majority of the funding provided by Sagemcom**

As part of its corporate mission commitments, Sagemcom has set a goal of providing health coverage—with the company covering the majority of the costs—to 100% of its employees. This is a significant commitment and an ambitious goal, and it has proven successful, as 98% of employees worldwide are now covered by health insurance that is primarily funded by Sagemcom. For example, the teams who moved into the new production site in Vietnam at the beginning of 2024 were immediately able to benefit from health coverage guaranteeing access to quality care, as well as a health check-up, both covered by Sagemcom. The Group has set a goal of achieving 100% coverage for all its employees by 2030.

### **4.2.2 Equal pay and continued pay during maternity leave**

At most of our subsidiaries, female employees receive their full salary during the statutory period of their maternity leave. To ensure this level of protection, Sagemcom provides a salary supplement in accordance with local regulations, as maternity coverage varies by country where we operate. This continued salary payment is a key lever for maintaining pay equity between women and men. True to this principle, Sagemcom intends to standardize this measure by extending it to all of its subsidiaries. This expansion will be rolled out starting in 2026, as part of the commitments made as a mission-driven company.

## 4.3 Indicators on compensation, social protection, and living wages

### 4.3.1 Ratio of the standard entry-level salary by gender to the local minimum wage - GRI Indicator 202-1

EMPLOYEES PERMANENT		MEN	WOMEN	OTHER	NO PRESS RE-LEASES
<b>Sagemcom UES (Broadband France and Energy &amp; Telecom France)</b>	2023	108%	108%	0%	0%
	2024	120%	120%	0%	0%
	2025	125%	125%	0%	0%
<b>Sagemcom Tunisie SARL (including Sagemcom Services Tunisie SARL)</b>	2023	165%	165%	0%	0%
	2024	154%	154%	0%	0%
	2025	121%	121%	0%	0%
<b>Sagemcom Multi Energy Industry</b>	2023	100%	100%	0%	0%
	2024	101%	101%	0%	0%
	2025	101%	101%	0%	0%
<b>Sagemcom Brazil Telecommunications, Ltd.</b>	2023	155%	155%	0%	0%
	2024	156%	156%	0%	0%
	2025	156%	156%	0%	0%
<b>Sagemcom (Tianjin) Co., Ltd.</b>	2023	246%	242%	0%	0%
	2024	249%	275%	0%	0%
	2025	299%	268%	0%	0%
<b>Sagemcom Fröschl GmbH</b>	2023	151%	100%	0%	0%
	2024	152%	100%	0%	0%
	2025	151%	100%	0%	0%
<b>Sagemcom Dr. Neuhaus GmbH</b>	2023	113%	100%	0%	0%
	2024	117%	102%	0%	0%
	2025	116%	100%	0%	0%
<b>Sagemcom Hungary Electronics Kft</b>	2023	158%	137%	0%	0%
	2024	153%	148%	0%	0%
	2025	156%	146%	0%	0%
<b>Sagemcom Software &amp; Broadband Technology LLC</b>	2023	503%	503%	0%	0%
	2024	141%	141%	0%	0%
	2025	141%	141%	0%	0%

<b>EMPLOYEES TEMPORARY</b>		<b>MEN</b>	<b>WOMEN</b>	<b>OTHER</b>	<b>NO PRESS RE- LEASES</b>
<b>Sagemcom UES (Broadband France and Energy &amp; Telecom France)</b>	2023	108%	108%	0%	0%
	2024	120%	120%	0%	0%
	2025	125%	125%	0%	0%
<b>Sagemcom Tunisie SARL (including Sagemcom Services Tunisie SARL)</b>	2023	165%	165%	0%	0%
	2024	154%	154%	0%	0%
	2025	121%	121%	0%	0%
<b>Sagemcom Multi Energy Industry</b>	2023	102%	102%	0%	0%
	2024	0%	0%	0%	0%
	2025	0%	0%	0%	0%
<b>Sagemcom Brazil Telecommunications, Ltd.</b>	2023	155%	155%	0%	0%
	2024	156%	156%	0%	0%
	2025	100%	100%	0%	0%
<b>Sagemcom (Tianjin) Co., Ltd.</b>	2023	0%	0%	0%	0%
	2024	0%	0%	0%	0%
	2025	296%	276%	0%	0%
<b>Sagemcom Fröschl GmbH</b>	2023	0%	0%	0%	0%
	2024	0%	0%	0%	0%
	2025	0%	0%	0%	0%
<b>Sagemcom Dr. Neuhaus GmbH</b>	2023	0%	0%	0%	0%
	2024	0%	0%	0%	0%
	2025	0%	0%	0%	0%
<b>Sagemcom Hungary Electronics Kft</b>	2023	0%	0%	0%	0%
	2024	0%	0%	0%	0%
	2025	0%	0%	0%	0%
<b>Sagemcom Software &amp; Broadband Technology LLC</b>	2023	503%	503%	0%	0%
	2024	141%	141%	0%	0%
	2025	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 pursues a proactive policy aimed at ensuring the physical and mental well-being and health of everyone at its sites. This approach is part of a commitment to promoting a work environment that fosters quality of life while preserving health and maintaining productivity; it also aligns with international standards (ISO 9001, 14001, and 45001), which serve as benchmarks for environmental, health, and safety management within the Group.

The Group's top priority is to eliminate hazards and reduce risks associated with occupational illnesses, serious accidents, and frequent incidents. This commitment is centered on a clear goal: to strive each year toward a "zero accidents" target. Although this goal represents a significant challenge, it is considered essential within the framework of the Group's values. This fundamental principle is thus enshrined in the Group's articles of incorporation, through the mission-driven company model, as well as in the "Sagemcom Global Policy on Working Conditions, Respect for Human Rights, and Environmental Protection," which governs Sagemcom's commitments.

These initiatives are implemented through preventive measures and training programs that prioritize the health and safety of employees, regardless of their job roles or work environments. To carry out these initiatives, the Group Human Resources Department takes the lead, supported by Health and Safety teams that report directly to it and work toward a single goal: fostering a shared culture that promotes the health and safety of everyone.

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

#### 5.2.1 Workplace Safety Measures

Employee safety is systematically assessed for each job function. This risk assessment, reviewed annually or whenever there are changes to activities or processes, enables us to anticipate potentially hazardous situations and implement preventive and protective measures, both individual and collective. Areas of focus include, in particular, fire safety, protection against electrical hazards, and exposure to chemicals or noise pollution.

Various procedures have been implemented to effectively manage the risks faced by employees. These procedures include:

- risk assessment,
- compliance with legal requirements,
- the validation of protective equipment,
- the reporting of accidents and incidents,
- the implementation of preventive and corrective measures,
- raising awareness and providing information to employees,
- the management of hazardous substances.

Employees receive ongoing safety training from the moment they join the company and throughout their careers. For example, at the R&D center in Tunisia, safety awareness days are regularly organized to address key topics such as fire evacuation, the use of personal protective equipment, and first aid. In the African subsidiaries, certified safety training (IOSH) has been offered to address risks specific to local operations.

As part of its commitments as a mission-driven company, and in addition to the mandatory regulatory training covering all at-risk personnel, Sagemcom provided specific preventive safety training to 90% of its teams in 2025, and 100% of its teams participated in at least five safety-related initiatives, including:

- establishment of key stakeholders / safety ecosystem (safety officers, prevention specialists, close ties with occupational health services, etc.),
- preventive measures (the “ergonomics” project, wearing PPE, posting signs in high-risk areas, traffic patterns in workshops, etc.),
- training and awareness programs (Electrical systems and maintenance work = maintenance team; storage and transport of materials = logistics team; handling of chemicals = cleaning team; ergonomics = Safety and Engineering team...),
- safety management and monitoring (workplace accidents, dashboards, etc.)

### **Reporting procedure that allows employees to report incidents, risks, and concerns related to occupational health and safety**

An incident reporting procedure is in place for all of our factories, R&D sites, and subsidiaries involved in construction activities (GIS subsidiaries). These sites represent the environments with the highest levels of exposure to operational risks; therefore, it is important to ensure that a system for reporting and handling incidents is in place at these locations.

The procedure allows any employee to immediately report an incident or a hazardous situation through the channels established locally (reporting tool, HSE representative, line manager, etc.). Each report triggers an analysis of the causes and risks, as well as the implementation of corrective or preventive actions.

For sites considered to be at lower risk (often offices), there may be no formal procedure in place. However, any employee who encounters an OHS risk or concern is required to report it to the HSE or HR team, depending on the local organization.

This feedback enables us to conduct an appropriate risk analysis and, if necessary, implement the necessary measures:

- Awareness-raising activities,
- Submission of a reflex form,
- Update to the risk assessment.

This system ensures that all employees, regardless of their role or location, have a clear and accessible way to report issues.

### **Preventive measures against musculoskeletal disorders (MSDs)**

Due to the wide range of activities (factories, laboratories, construction sites, etc.), there is no single procedure applicable across the entire Group regarding the prevention and management of musculoskeletal disorders (MSDs). All sites potentially exposed to these repetitive ergonomic risks (primarily factories) implement customized local procedures tailored to the nature of their activities and their equipment. Here are two sites that illustrate these practices.

MEI Production Site (France):

- Shift rotation every 2 hours.
- Ergonomic studies conducted at critical workstations.
- Specialized ergonomic equipment, including:
  - Push-type screwdrivers,
  - Support arm for screwdrivers,
  - Height-adjustable sit-stand desk with casters.
- Integration of cobotics solutions (cobots for screwing/unscrewing on metro lines) to reduce physical strain.
- Warm-up at the start of the shift to prepare the muscles and prevent injuries.
- Awareness campaigns on proper movements and postures.
- A system for reporting near-misses, promoting continuous improvement.
- Provision of an exoskeleton (rarely or never used, but available for high-risk tasks).

Production facility in Manaus (Brazil):

- A team is responsible for evaluating the production lines. It systematically analyzes:
  - Ergonomic constraints,
  - Repetitive movements,
  - Areas for improvement.
- Job rotation every hour.
- Automation of certain stations, enabling:
  - Improved industrial performance,
  - A direct reduction in exposure to repetitive strain.
- Two 10-minute breaks per shift.

### **Percentage of operational sites that have undergone a health and safety risk assessment for employees**

Occupational health and safety (OHS) risk assessments cover 100% of Sagemcom's operational sites. This requirement applies across the entire Group, regardless of the size of the sites, their location, or their level of risk exposure.

Headquarters, manufacturing facilities, R&D centers, GIS subsidiaries:

For these sites with the most significant occupational health and safety risks, a dedicated OHS/HSE team has been established. These teams perform the following tasks on a daily basis:

- Updating risk assessments,
- Monitoring of action plans,
- The adaptation of preventive measures,
- The relationship with operational managers and employee representatives.

Since these environments are more exposed (production facilities, laboratories, construction sites), the occupational safety and health (OSH) approach is structured, documented, and integrated into the site's daily operations.

Office locations (subsidiaries with low exposure):

In subsidiaries where business is primarily service-oriented and the level of occupational health and safety risk is lower, there is not always a local HSE team. In such cases, the HR team is responsible for risk assessment and handles:

- Identifying office-specific risks (ergonomics, fire safety, movement, etc.),
- The implementation of appropriate preventive measures,
- Employee awareness.

Small subsidiaries (1 to 10 employees):

For very small businesses, the company has implemented a specific program:

- Responsibility lies at the corporate level,
- The risk analysis is conducted in accordance with the local regulations of the country in question,
- The individual needs of employees are taken into account (instructions, minimum procedures, provision of safety equipment as needed, etc.).

In 2025, a survey was conducted to better understand occupational safety and health (OSH) needs and to strengthen workplace risk prevention. As a result, even the smallest facilities benefit from a compliant and tailored OSH framework.

### **Measures to prevent exposure to noise**

All affected sites are implementing appropriate preventive measures to address the risk of noise exposure. These measures ensure that noise exposure is kept under control in all affected work environments.

The noise prevention approach is based on:

- A risk assessment based on the nature of the site,
- Measures to eliminate or reduce noise at the source,
- Organizational measures to limit exposure,
- Personal protective equipment,
- Employee training and awareness,
- Appropriate medical monitoring when required by regulations.

Factories, which are more exposed to noise-related risks, are implementing several technical and organizational measures, including:

- Mapping and regular noise measurements in workshops to identify high-risk areas and adjust preventive measures.
- Noise reduction at the source, including:
  - The installation of quieter equipment,
  - The addition of soundproofing to the machines,
  - Preventive maintenance to minimize abnormal noise levels.
- Establishment of clearly identified specific zones (noisy zones / quiet zones).
- Rotate workers in the most exposed areas to reduce cumulative exposure time.
- Provision of appropriate PPE, such as noise-canceling headphones or custom-molded earplugs.
- Raising employee awareness about the proper use of PPE and the associated hearing risks.
- Appropriate medical follow-up in accordance with local requirements.

For R&D centers, specific measures are implemented for teams exposed to noise, particularly those involved in the development of our Video Sound Box products, who regularly conduct acoustic tests at levels that can sometimes be high. To ensure their protection, the use of custom-molded earplugs is mandatory. This equipment, perfectly adapted to each user's anatomy, provides optimal noise attenuation while maintaining comfort and the ability to communicate.

### **Measures to control exposure to hazardous substances**

For sites where operations involve the handling or presence of hazardous substances, a chemical risk assessment is routinely conducted. This assessment identifies the hazards associated with the products, evaluates the potential level of employee exposure, and establishes preventive measures tailored to the specific operations and work environment.

Based on this analysis, technical measures (such as the substitution of hazardous products and secure storage), as well as organizational and personnel measures (handling procedures, mandatory employee training, and the provision of appropriate PPE) are implemented to minimize risks associated with chemical agents. This framework is complemented by efforts to raise awareness of best practices and regulatory requirements related to the handling of hazardous substances.

Example of the headquarters in Bois-Colombes (France):

Certain laboratory activities require heightened vigilance; a dedicated procedure governs the entire management of chemicals. This procedure provides for:

- A biannual inventory of the products used;

- The systematic review and updating of safety data sheets;
- The availability of appropriate shared protective equipment (exhaust hoods, designated storage areas);
- Specific emergency procedures in the event of a splash or spill.

### 5.2.2 Health Prevention and Support

The Group also pays special attention to the health of its employees by implementing preventive measures.

These initiatives are designed, in particular, to prevent musculoskeletal disorders (MSDs) by implementing ergonomic measures in the design of tools and workspaces, as well as by organizing awareness-raising workshops on various health topics.

For example, at some sites, the first few minutes of the day are devoted to stretching exercises to reduce the risk of musculoskeletal disorders: sessions are regularly held at the Shenzhen sites, as well as at Sagemcom's industrial sites in Taden and Tunis.

Sagemcom does not intend to limit its commitment to security alone but also wishes to extend it to healthcare by implementing a preventive approach.

As a result, within the research and development teams in Tunisia, an expanded medical service—comprising a board-certified physician, an occupational physician, a physical therapist, and health and safety advisors—is available to everyone, every day of the week. Information campaigns, such as “Pink October,” have also been conducted to raise employee awareness of the risks of serious illnesses and encourage healthy lifestyles.

At Tunisian R&D sites, awareness workshops are regularly held on various health topics, including anti-smoking initiatives, breast cancer prevention and screening, awareness of musculoskeletal disorders, balanced nutrition, and digestive health.

With a view to strengthening preventive healthcare, the Group continued in 2025 to implement action plans focused on several key areas:

- develop preventive and ergonomic measures in the design of new tools and facilities or in the preparation of workstations, thereby reducing risks such as the onset of musculoskeletal disorders (MSDs),
  - An e-learning module tailored to the group's various roles is being rolled out to prevent the onset of musculoskeletal disorders (covering topics such as computer work and manual handling, for example),
  - Under the coordination of the Occupational Health department responsible for the Tunisian plants, in-depth studies were conducted on workplace ergonomics, both from a design perspective—integrated from the very outset of the creation of workstations and tools, in compliance with safety and sizing standards— and from a corrective perspective, based on risk assessments conducted in collaboration with operational teams. These studies were then shared

within a multidisciplinary committee, bringing together teams from Health, HR, Methods, Safety, Production, Industry, and Continuous Improvement: they led to workstation redesigns and the automation of certain tasks, particularly those presenting a high risk of musculoskeletal disorders (MSDs),

- involve occupational medicine and occupational health services, going beyond medical monitoring, by providing advice aimed at contributing to occupational risk prevention efforts (physical strain, ergonomic adjustments to workstations, travel, etc.) but more generally with a view to encouraging employees to adopt healthy lifestyles. This advice is provided either on an individual basis or during group information and awareness sessions as part of information campaigns, during visits to workshops or offices, or when implementing information and prevention campaigns. Several initiatives have also been carried out at various sites in Tunisia, such as screenings for diabetes and high blood pressure, as well as awareness campaigns on topics such as breastfeeding.

To minimize risks as much as possible, personal protective equipment is made available to everyone to complement the collective preventive measures that have been put in place. In addition, employees are involved in defining safety guidelines, which are essential to ensure that the measures and associated equipment (gloves, goggles, earplugs, harnesses, safety shoes, etc.) are compatible with their daily work routines. Furthermore, management ensures that safety guidelines and recommended methods are followed. Sagemcom also takes into account technological advancements in its production tools (such as the integration of automated lines) when identifying and managing new risks. Safety analyses are conducted in all situations (including maintenance and waste management), and specific rules are implemented. These are supplemented by operator training sessions and, of course, by providing appropriate equipment. Tests are conducted annually or more frequently, depending on their impact, and the results of these tests are reported monthly by local management. A mid-year review is conducted to verify that actual results align with objectives. Corrective actions are implemented if this is not the case, and the results are analyzed by senior management.

In addition to the measures taken for production, procedures are also in place for teams handling electrical or gas-powered products, or those containing lithium batteries: thus, even without certification, the same rules apply to them. For example, every employee required to work near an electrical product or machine must complete a training course on electrical hazards. Upon completion of this training, and provided they pass the final exam, they are then issued an electrical safety certification. Protective measures against electric shocks, fires, and explosions have also been implemented within the laboratories: and across all Group entities, a QHSE (Quality, Health, Safety, and Environment) Manager is appointed to ensure the health and safety of employees. For example, for all African subsidiaries (excluding Tunisia),

a consistent QHSE approach has been established and implemented under the leadership of an Africa QHSE Manager. This approach is part of Sagemcom's proactive policy on health, safety, and the environment, aimed at providing our employees with the best working conditions while meeting our customers' expectations.

### 5.2.3 Quality of life at work

#### **A communication platform that allows employees to voice their opinions about their working conditions**

The Group is implementing initiatives aimed at improving the quality of life at work by modernizing workspaces and promoting a better work-life balance. In 2024, the move to new offices in China, the United States, and Bois-Colombes made it possible to provide suitable environments that foster collaboration and employee well-being.

Workstations are ergonomically designed with adjustable equipment, tailored in consultation with the Occupational Health department, which can provide customized adjustments suited to each individual's body type.

In France, a "Job and Career Management" agreement was signed in 2024 by management and employee representatives, making the fight against a sedentary lifestyle a priority: poster campaigns, group awareness initiatives, and a dedicated section on the intranet—everyone can find the information they need to take charge of their own health, in addition to the initiatives launched by management.

Finally, measures are being implemented to identify and resolve issues related to balancing work and personal life. This proactive approach is based on employee feedback, which is analyzed by human resources teams to define concrete actions aimed at sustainably improving working conditions. Thus, the systematic analysis of difficulties in balancing work and personal life, as expressed during Individual Performance and Progress Reviews (EIDP), is rigorously addressed by human resources teams, who conduct an in-depth study of the situations raised. The objective is to identify, in a targeted manner, relevant levers for action and to define concrete action plans tailored to the identified needs. This proactive approach aims to provide sustainable solutions to the issues encountered, with a view to continuously improving working conditions and, more broadly, enhancing the quality of life at work.

By 2025, 98% of EIDPs will have been completed, 100% will have been analyzed, and 100% will have been closed out, resulting in a 2025 target of 100% of EIDPs analyzed and closed out (see the section "Steering and Supporting Performance, Development, and Progress").

It should be noted that, by 2025, 100% of the Group's employees will be covered by an action plan designed to promote quality of life at work, in accordance with the commitments set forth under the company's mission statement: this means that 98% of the Group's employees will be covered by at least two initiatives included in a "Quality of Life at Work" action plan:

- analysis and resolution of difficulties in balancing work and personal life as expressed in the EIDPs,
- agreement or action plan promoting quality of life at work (work-life balance, telecommuting, prevention of psychosocial risks, the right to disconnect, etc.),
- ergonomics projects, particularly in factories (ergonomics and working conditions project in Tunisia, exoskeleton at MEI...),
- Other initiatives: new work environments (Bois-Colombes, the U.S., China, etc.), monitoring of long working hours to prevent difficulties in balancing work and personal life, relaxation rooms in certain subsidiaries, etc.

The Group aims to maintain this level of coverage for all its employees at least through 2030.

### 5.3 Indicators related to health, safety, and quality of life at work - GRI Indicator 403 - 9

#### Number and rate of deaths

	Employees			Other workers		
	2023	2024	2025	2023	2024	2025
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 workplace accidents resulting in serious injury (excluding fatalities)

	Employees			Other workers		
	2023	2024	2025	2023	2024	2025
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 reportable workplace accidents

	Employees			Other workers		
	2023	2024	2025	2023	2024	2025
Group Number	255	50	50	15	18	12
Group Rate	22,757	5,011	5,048	18,853	50,556	59,225

## Severity rating

	Employees + Other workers		
	TG 2023	TG 2024	TG 2025
Sagemcom UES (Broadband France and Energy & Telecom France)	0,273	0,081	0,031
Sagemcom Tunisie SARL (including Sagemcom Services Tunisie SARL)	0,024	0,011	0,019
Sagemcom Multi Energy Industry	0,020	0,088	0,022
Sagemcom Brazil Telecomunicacoes, Ltd.	0,000	0,000	0,000
Sagemcom (Tianjin) Co., Ltd.	0,000	0,000	0,000
Sagemcom Fröschl GmbH	0,289	0,000	0,000
Sagemcom Dr. Neuhaus GmbH	0,000	0,206	0,069
Sagemcom Hungary Elektronika Kft.	0,000	0,000	0,000
Sagemcom Software & Broadband Technology LLC	0,007	0,014	0,012
<b>Total Sagemcom</b>	<b>0,049</b>	<b>0,024</b>	<b>0,018</b>

## Frequency rate

	Employees + Other workers		
	TG 2023	TG 2024	TG 2025
Sagemcom UES (Broadband France and Energy & Telecom France)	0,000	0,832	2,365
Sagemcom Tunisie SARL (including Sagemcom Services Tunisie SARL)	2,913	1,300	2,378
Sagemcom Multi Energy Industry	13,172	13,561	5,577
Sagemcom Brazil Telecomunicacoes Ltda	0,000	0,000	0,000
Sagemcom (Tianjin) Co., Ltd.	0,000	0,000	0,000
Sagemcom Fröschl GmbH	13,782	0,000	0,000
Sagemcom Dr. Neuhaus GmbH	0,000	68,559	11,421
Sagemcom Hungary Elektronika Kft.	0,000	0,000	0,000
Sagemcom Software & Broadband Technology LLC	3,495	3,499	1,387
<b>Total Sagemcom</b>	<b>2,666</b>	<b>2,032</b>	<b>2,176</b>

## Pillar 4 - Mission-Driven Companies: 2025 Indicators

Operational objectives	Indicators	2024	2025	Trajectory
Provide health insurance coverage, with the company covering 100% of the costs, for all of our employees	Percentage of employees covered by health insurance	98% in 2024 (vs. 89% in 2023)	100%* by 2025	
	Percentage of employees covered by a safety action plan	98% in 2024	100% by 2025	100% by 2030
Implement best practices for employee safety	Percentage of employees trained in perimeter security at GIS	89% of employees have received safety training within the GIS International organization: <ul style="list-style-type: none"> <li>• Regulatory training: 100%</li> <li>• Preventive training: 83%</li> </ul>	94% of employees have received safety training within the GIS International organization: <ul style="list-style-type: none"> <li>• Regulatory training: 100%</li> <li>• Preventive training: 90%</li> </ul>	
Implement best practices to help improve our employees' well-being at work	Percentage of employees covered by a program promoting quality of life at work	100% of employees covered by an initiative promoting quality of life at work within the scope defined in the roadmap (96% across the Group)	100% of employees covered by an initiative promoting quality of life at work within the scope defined in the roadmap (97% across the Group)	100% by 2030

*\*within the feasible scope approved by the mission committee*

## Procedures for addressing adverse impacts and channels through which company employees can raise concerns, as well as cases, complaints, and human rights impacts

The Group is implementing accessible and effective mechanisms to identify, address, and remedy potential or actual negative impacts on human rights and working conditions. These procedures are part of our Global Policy on Sustainability and Respect for Human Rights.

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

- the HR representatives at each site or subsidiary, who have been specially trained in the ethical handling of reports,
- the Whispli platform, a secure tool that ensures the anonymity of reports where legally permitted,
- the dedicated website [ethics@sagemcom.com](mailto:ethics@sagemcom.com),
- the Compliance Committee, which ensures that reports are handled independently, impartially, and confidentially.

These mechanisms allow for the reporting of any type of incident, including harassment, discrimination, inappropriate working conditions, or any violation of fundamental rights.

### 5.4 Processing of reports

All reports are handled in a structured and confidential manner. The process includes the following steps:

- recording and tracking of reports in a secure system, ensuring data protection and the confidentiality of the information provided,
- an initial review conducted by a specialized task force comprising representatives from Human Resources and Compliance, in order to assess the nature and severity of the facts,
- implementation of appropriate and proportionate corrective measures when the facts are established (e.g., awareness-raising initiatives, organizational adjustments, mediation, or disciplinary sanctions),
- individualized follow-up and communication with the person who filed the report (when identified), while strictly respecting confidentiality and protecting against any form of retaliation.



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# Workers in the value chain

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## 1. Policies Related to Workers in the Value Chain

Sagemcom's policy regarding workers in its value chain is part of Pillar 3 of its Mission-Driven Company approach; it is further detailed in the Group's Procurement Policy and reflected, in particular, in the commitments outlined in the Sagemcom "Ethics 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 company that has been committed to this cause for many years, this conviction has emerged as central to the development of Sagemcom's purpose, since one of the Group's five objectives specifically addresses its value chain.



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

### 2.1 Signing of the Ethics Charter

Sagemcom has established an "Ethics Charter" that every supplier to the Group is required to adhere to. This charter is based, among other things, on the international labor conventions of the ILO (International Labor Organization), 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:

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Prohibit child labor for children under the legal working age in effect in the country, unless there is an ILO exemption clause.

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Eliminate any type of work that, by its nature or conditions, poses an immediate danger or is likely to jeopardize health and safety.

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Respect freedom of association and ensure the effective recognition of the right to collective bargaining.

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Apply a precautionary approach to environmental issues.

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Take steps to promote greater environmental responsibility.

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Prohibit all forms of compulsory or forced labor.

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Promote and uphold the protection of internationally recognized human rights.

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Ensure that you do not become complicit in human rights violations.

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Promote the development and dissemination of environmentally friendly technologies.

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Eliminate discrimination in employment and occupation.

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Take action against all forms of corruption, including extortion and bribery.

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By signing this charter, suppliers commit to promoting and adhering to the above principles, as well as encouraging their own subcontractors and suppliers to do the same.

To ensure greater transparency between Sagemcom and its suppliers, the Ethics Charter also sets forth the terms and conditions for audits to be conducted on suppliers' premises. Suppliers agree to undergo verification audits in accordance with the provisions of the Ethics Charter.

One of the first milestones in Sagemcom's ethical initiative was the adoption of the Ethics Charter by 100% of its existing suppliers, thereby establishing a common set of principles to be followed. Since 2023, this charter has been made mandatory for all new suppliers wishing to work with Sagemcom. In 2025, efforts continued to strengthen social and environmental responsibility across the entire supply chain and achieve 100% coverage of the Group's suppliers who have signed this Ethics Charter.

It should be noted that in 2024, the Group's Task Force was asked to formalize the criteria for excluding certain categories of suppliers from this requirement: a decision that was accepted because the categories in question were marginal, either in terms of the volume of business they represent for the Group or in terms of their field of activity (examples: hotels, venue rentals for trade shows, energy suppliers, etc.)

## 2.2 On-site audits

Sagemcom's strategy to ensure that 100% of its partners are committed and responsible by 2030 consists of three phases:

- first ensure that all of the Group's suppliers of components and finished products have signed the ethics charter. By the end of 2024, 99.4% of the suppliers in question had signed the code,
- At the same time, in 2023, 100% of critical suppliers were audited to establish an initial rating of their maturity regarding ethical issues,
- Third, corrective actions and sanctions are implemented for suppliers whose audit results do not meet standards.

In 2025, 176 audits were conducted—compared to 195 in 2024—among suppliers to ensure their compliance with the ethical principles expected by Sagemcom. This initiative has borne fruit, with an increase in the number of suppliers receiving the highest ratings (A/B), demonstrating that the support measures implemented by Sagemcom contribute to tangible improvements in its partners' ethical standards. Thus, in 2025, 111 suppliers received an A or B rating, 29 a C rating, and 36 a D rating. Finally, it should be noted that in 2025, four of Sagemcom's suppliers were removed from the panel for non-compliance with ethical requirements or a lack of satisfactory progress in their situation between two audits.

### 2.3 Regular training for internal teams

To support the Group's teams in implementing the ethics and environmental policy throughout the supply chain, training sessions are held on a regular basis. As a result, every new employee who will be working with the supply chain attends a one-day training session organized jointly by the Procurement Department and the CSR Department.

The annual "Suppliers Days" event, which brings together all of the Group's suppliers and purchasing teams, also provides an opportunity to share with all of Sagemcom's Tier 1 suppliers the Group's ethical and environmental requirements, challenges, and objectives, with which the supply chain must comply.

It should be noted that in 2024, the Sagemcom Group's procurement teams participated in "Fresque du Climat" training, an initiative that continued in 2025 with new hires.

### 2.4 Reporting channels

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

- [ethics@sagemcom.com](mailto:ethics@sagemcom.com)

This system allows users to exercise their right to report concerns, anonymously if they wish (in accordance with local regulations), and ensures that there will be no retaliation.

Every report is handled with rigor, transparency, and confidentiality. An initial assessment is promptly conducted to evaluate the severity and validity of the report. If warranted, a thorough investigation is carried out, which may lead to the implementation of appropriate corrective measures, particularly in cases where there is a proven impact on employees, consumers, or any other affected parties.

Full traceability is ensured through a secure system that allows for the tracking and archiving of cases handled. An aggregated analysis of reports is also conducted periodically to identify any recurring trends and implement preventive measures or continuous improvement initiatives.

In 2025, four reports were received: three via the Whispli platform and one via an ethics liaison. All were reviewed; one led to a thorough investigation followed by appropriate corrective measures.

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

#### Pillar 3 - Mission-Driven Companies: 2025 Metrics

Operational objectives	Indicators	2024	2025	Trajectory
<b>Achieve Net Zero (as defined by the SBTI) across our supply chain supply in 2040</b>	Percentage of panel suppliers with a 2040 low-carbon strategy			
	Supplier response rates regarding carbon scopes	7 new panels surveyed in 2024 via the CDP to reach 80% of revenue	100% response rate via the CDP	Currently being finalized
	Supplier response rate on component impacts			
<b>100% of our partners will be committed and responsible by 2030</b>	Percentage of suppliers who have signed the Ethics Charter	100% of our suppliers, excluding those approved for exclusion by the task force	100% of our suppliers, excluding those approved for exclusion by the task force	100%, to be maintained over time
	Audit coverage rate by panel	100%	100%	100%, to be maintained over time
	Percentage of responsible suppliers (CSR Audits A or B) vs. total number of audited suppliers	193 audits conducted in 2024, 62% of audited suppliers received an A or B rating, 3 suppliers excluded from the panel	176 audits conducted in 2025, 75% of suppliers rated A or B, 4 suppliers excluded from the panel	100% of suppliers rated A or B by 2030

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# Consumers

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## 1. Consumer Policies

The Sagemcom Group is fully committed to ensuring the safety, health, and protection of consumers and end users, guided by rigorous international standards and strict internal policies. This approach is part of a comprehensive vision of social and environmental responsibility, aimed at providing products and services that meet the highest standards, regardless of the regions where they are distributed.

By integrating consumer protection, environmental impact reduction, cybersecurity, and ethical governance, Sagemcom contributes across the board to several Sustainable Development Goals of the United Nations Global Compact, particularly SDGs 3, 9, 12, 13, and 16, thereby strengthening its positive impact on society.



### 1.1 Ethical Governance and Quality Policy

All of these initiatives are part of a comprehensive ethical policy, supported by the Group's safety and quality policies, which set clear requirements for all subsidiaries and partners. This governance framework ensures consistency and transparency in the commitments made to consumers and end users, while contributing to the sustainability of the Group's operations.

In this way, Sagemcom ensures that every product and service meets the highest standards of security, quality, and responsibility, thereby building user trust and reinforcing its role as a company committed to sustainable and secure consumption.

## 2. Actions and resources related to significant impacts on consumers

### 2.1 Regulatory Compliance and Environmental Management

Sagemcom strictly complies with key European and international regulations, such as RoHS (Restriction of Hazardous Substances) and REACH (Registration, Evaluation, Authorization, and Restriction of Chemicals), thereby ensuring that hazardous substances in its products are kept to a minimum. The Group also implements environmental management systems certified to ISO 9001, ISO 14001, and ISO 45001, ensuring continuous improvement in quality, safety, and environmental performance.

To preserve natural resources and minimize its environmental footprint, Sagemcom uses integrated Quality Management System (QMS) tools to monitor and optimize 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 cornerstone of the Group's strategy. Sagemcom strictly adheres to the most rigorous product safety standards, even in countries where local regulatory requirements are less stringent 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 we offer.

The Group conducts rigorous testing, regular audits, and quality controls at every stage of the product lifecycle, ensuring that health and safety risks are prevented.

### 2.3 Cybersecurity

In sectors where service continuity, data integrity, and infrastructure resilience are critical, Sagemcom treats cybersecurity as a long-term strategic priority. In particular, the Group secures products and solutions deployed by the millions in the field (telecom equipment and smart metering solutions), which represent a significant point of exposure within digital and energy infrastructures. Sagemcom's approach is based on a comprehensive view of cybersecurity, covering internal information systems, platforms, products, and solutions deployed at customer sites. This approach spans the entire lifecycle, from design and development through deployment, operation, vulnerability management, incident response, and maintaining the security of equipment in service. In this regard, Sagemcom integrates cybersecurity requirements from the very design phase of its products and solutions. Thus, in 2025, 209 new projects with 100% of release reviews—including a security review—and 29 additional secu-

urity audits (20 days of penetration testing) were conducted on critical versions. This approach aims to mitigate risks early on, enhance the robustness of system architectures, secure access, update, and monitoring mechanisms, and track vulnerabilities throughout the equipment's lifecycle. It also helps support customers in increasingly demanding regulatory and operational environments.

The governance of the system is based on an ISO 27001-certified Information Security Management System, supplemented by a structured approach to personal data protection. It brings together information systems security teams, IT operations teams, the SOC, the CSIRT, and product security experts, working in a coordinated manner across the Group and its locations. Twenty-two employees contribute to this framework within the Group.

From an operational standpoint, the Group relies on monitoring, detection, and response capabilities that enable it to identify, assess, and address security incidents as quickly as possible across more than 200 million products.

The integration of product security, environmental monitoring, incident response, and lessons learned contributes to the continuous improvement of the system. This organizational structure strengthens the Group's ability to mitigate the impact of an incident, ensure service continuity, and support the resilience of the critical infrastructure operated by its clients: in 2025, more than 5,000 security events were categorized, including 624 confirmed incidents, with an average time to classify major incidents of less than one business day, an average containment time of 6.7 days, and 133 critical vulnerabilities prioritized for resolution among all vulnerabilities addressed.

Through this end-to-end approach, Sagemcom aims not only to protect its own assets, but also to create lasting value for its customers by reducing systemic risks associated with connected devices, facilitating compliance with applicable requirements, and offering integrated, resilient solutions built to last.

In addition, Sagemcom relies on a system for monitoring its digital infrastructure that combines advanced detection tools (SIEM, EDR) with the support of expert teams. These teams bring together complementary profiles from the Information Systems Department (ISD) and the Information Systems Security Department (ISSD), in coordination with a network of experts located at the Group's various sites.

Since 2021, the Group has also established a CSIRT (Computer Security Incident Response Team), which has been affiliated with interCERT-FR since 2022.

This person oversees safety matters through:

- of the SPSL (Secure Product Security Lab), whose top priority is the security of the products and solutions we sell to our customers,
- members of the Information Systems Security Department, whose priority is the security of our infrastructure and data,
- IT operations teams and the SOC (Security Operations Center), which handle security alerts on a daily basis and are able to respond around the clock, 24 hours a day, 7 days a week.

This structure enables the rapid identification and resolution of incidents, minimizes their impact, and ensures the traceability of the actions taken. It thus helps manage the risks associated with the Group's products and services, particularly those that could compromise users' digital security.

Finally, a PIMS (Privacy Information Management System) rounds out this framework, ensuring compliance with personal data protection requirements in line with the Group's Information Security Management System.

## 2.4 Personal Data Protection

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

This policy advocates adherence to the principles of lawfulness and fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity and confidentiality, accountability, data protection by design and by default, and individual rights, as set forth in the GDPR. These principles apply to all Sagemcom subsidiaries worldwide. Training and awareness-raising initiatives are regularly conducted within the Group : for example, in 2025, an e-learning course dedicated to personal data protection was rolled out to all Group employees.

Sagemcom's commitment extends beyond its employees : the company requires all suppliers, customers, and subsidiaries to provide documentation regarding their data processing practices. Furthermore, since 2023, the Group's corporate operations have been ISO 27701 certified, with the scope of certification extended to include R&D.



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# Information on Business Conduct

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## 1. Policies on Business Conduct and the Prevention and Detection of Corruption and Bribery

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—both in the fight against corruption and across all compliance-related matters—while drawing on industry best practices. In accordance with the principles of the United Nations Global Compact, Sagemcom is thus committed to:

- Apply its ethical and professional standards both internally and with its partners,
- Combating corruption, money laundering, and terrorist financing,
- Strengthen the traceability of minerals from conflict zones within its supply chain.

Sagemcom has a zero-tolerance policy toward any form of corruption, whether active or passive, direct or indirect. This fundamental commitment is intended to ensure that all of its business activities are conducted with integrity, fairness, and transparency.

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Sagemcom is committed, through all its employees and partners, to conducting its business in a transparent, fair, and honest manner.

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These commitments are reflected first and foremost in a Group policy “Sagemcom’s Global Policy on Working Conditions, Respect for Human Rights, and Environmental Protection,” establishing the framework “Compliance and Ethics,” a framework to which the Group adheres. Sagemcom is thus committed, through all its employees and partners, to conducting its business in a transparent, fair, and honest manner.

This policy applies to all employees, executives, business partners, and suppliers of the Group, regardless of their position or geographic location. In particular, it covers:

- a strict prohibition on offering, promising, giving, or accepting any improper benefit of any kind with the aim of obtaining or retaining 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, as reflected in a supplier ethics charter that has been in place since 2007.

This policy serves as a guiding framework for all of the Group's stakeholders in their daily commitment to exemplary business conduct.

To implement its policy on business conduct and the prevention and detection of corruption and bribery, Sagemcom is implementing a series of concrete measures within a structured framework:

- a guide to corruption prevention, designed as an educational and practical tool. This guide details the main high-risk situations, provides concrete examples, and offers practical recommendations. It aims to raise employees' awareness of the various forms corruption can take—including extraterritorial risks associated with certain foreign laws—and to develop their ability to exercise sound judgment,
- a dedicated training program, including:
  - A mandatory e-learning module for all employees, which must be completed every two years. A final quiz, in which a minimum score of 80% must be achieved, is required to complete the training.
  - In 2023, 7.60% of employees completed this training module, rising to 9.30% in 2024. By 2025, 99% of employees had completed the anti-corruption training. Our goal is to maintain this 99% rate through 2028.
  - in-person awareness-raising sessions targeted at the most vulnerable populations,
  - a phased rollout across all of the Group's entities worldwide.
- A secure reporting system, accessible to all employees and stakeholders via:
  - the external whistleblowing platform Whispli,
  - a dedicated email address,
  - the option to contact a Group ethics officer or their local Human Resources department directly.
- a supplier selection and audit process based on a ethics charter, designed to ensure compliance with contractual ethical commitments,
- centralized management and clearly defined governance, overseen by a dedicated function within the organization. This function ensures that measures are applied consistently, updated in line with regulatory changes, and that any incidents or reports are tracked.

## 2. Initiatives and resources related to business conduct and the prevention and detection of corruption and bribery

### 2.1 Commitment to Compliance

Sagemcom is firmly committed to complying with regulatory requirements and promoting a culture of compliance and business ethics. As part of its compliance strategy, the Group has implemented rigorous measures to ensure that all its operations are conducted in accordance with applicable laws and regulations.

This approach is structured around a Compliance Committee, established in June 2023, which contributes to strategic direction and the monitoring of compliance issues within the Group. The committee is composed of representatives from the Administrative and Financial, Legal, Human Resources, and CSR departments. This committee meets once a month and addresses the full scope of compliance matters, which currently includes:

- corruption prevention,
- the prevention of fraud in all its forms,
- compliance with international sanctions,
- compliance with competition rules,
- the prevention and management of conflicts of interest,
- compliance with export control regulations,
- the fight against money laundering and terrorist financing.

The Compliance Committee met six times in 2023, ten times in 2024, and eleven times in 2025. Sagemcom aims to maintain this regularity and plans to hold at least nine meetings per year.

The Group has implemented ongoing processes for identifying, assessing, and managing compliance risks. These processes are supported by structured internal controls, formalized procedures, and regular awareness-raising and training initiatives for employees. These measures help strengthen the Group's compliance culture and ensure the dissemination of best practices in business ethics.

### 2.2 Internal Compliance Program

Sagemcom has implemented a comprehensive internal compliance program that spans all levels of its organization to ensure ethical and regulatory-compliant business practices.

At the top of this framework is the "Ethics Charter & Compliance," which sets forth the fundamental principles and values that every member of the company is required to uphold.

To complement this Code of Conduct, detailed policies and procedures have been developed for each key area of compliance. These documents define the specific standards that must be followed within Sagemcom, thereby en-

ensuring consistent and uniform application across the Group. To facilitate understanding and application of these policies, concise practical guides have been created for each topic. These guides provide a clear overview of key issues, rules to follow, and who to contact in case of doubt or need. They are designed to be accessible to all employees, regardless of their level of experience or role within the company.

Finally, for more complex topics or those requiring a deeper understanding, detailed practical guides have been developed: these documents go beyond simple guidelines and provide detailed explanations, practical examples, and case studies to help Group employees navigate more complex or ambiguous situations.

## 2.3 Corruption Prevention

The fight against corruption—and, more broadly, for integrity in the business world—cannot be waged without the involvement of companies. For many years, Sagemcom has been committed, through all its employees and partners, to conducting its business in a transparent, fair, and honest manner.

This is one of the commitments Sagemcom made when it joined the United Nations Global Compact in 2011. Given its global presence, the Group is naturally exposed to the risk of corruption, and contrary to popular belief, this risk exists in every country, regardless of its geographic, economic, or political situation. Beyond the regulations that establish a legal framework at the national and international levels, the fight against corruption remains a major challenge for companies and involves all stakeholders, regardless of their position (executives, employees, business partners).

In addition to legal risks, corruption poses risks to a company's image and reputation, and thus commercial risks as well as the risk of destabilizing its internal organization (loss of market share, loss of customers, closure of subsidiaries, etc.). Our clients, given their high profile, are particularly sensitive to ethical issues that could tarnish their reputation. They therefore require all their business partners to demonstrate full compliance and increased transparency in this area. Moreover, their liability as contracting parties may be called into question due to ethical issues in the supply chain, even if they are not directly involved.

## 2.4 Mapping Corruption Risks

Corruption risk mapping is one of the cornerstones of Sagemcom's anti-corruption framework. It enables the identification, assessment, and prioritization of situations that could expose the Group to integrity risks, in order to define appropriate and proportionate preventive measures.

Developed and updated under the coordination of the Group's Compliance function, the risk map is based on a structured methodology carried out in close collaboration with the relevant operational departments. In particular, it is based on:

the identification of sensitive activities and processes;  
analysis of risk factors (geographic, sector-specific, operational, and third parties involved);  
an assessment of the likelihood of occurrence and the potential impact;  
the identification of appropriate control measures.

This approach provides a consolidated and up-to-date overview of corruption risks across the Group.

The Group organizational chart serves as the common foundation for all subsidiaries. For the vast majority of them, decision-making authority binding on the Group—whether regarding expenditure commitments, transactions, or strategic decisions—is centralized at headquarters. In this context, the headquarters organizational chart serves as the primary reference and methodological framework to which the subsidiaries adhere.

To take into account the specific operational characteristics, regulatory environments, and risks unique to each market or geographic region, risk mapping is adapted at the local level. This adaptation is carried out jointly by Group Compliance and local teams, who contribute to the analysis and identification of risks specific to their area of responsibility. Local analyses are systematically reported to headquarters, which retains responsibility for making trade-offs and decisions binding on the Group, thereby ensuring methodological consistency and centralized risk management.

The results of the risk mapping directly guide the implementation of prevention and control measures, including internal procedures (gifts and hospitality, third-party due diligence, conflicts of interest, etc.), training and awareness initiatives, targeted internal controls, and mitigation measures for high-risk areas or activities. The risk mapping is reviewed regularly to reflect changes in business activities, markets, and the regulatory environment, thereby remaining a central tool for managing the anti-corruption framework.

## 2.5 The Guide to Preventing Corruption and Influence Peddling

To challenge common misconceptions and raise awareness among company stakeholders about the various forms of corruption, Sagemcom has developed a “Guide to Preventing Corruption and Influence Peddling.” It aims to clearly reaffirm the standards and principles that must govern everyone’s conduct to ensure compliance with the rigorous measures put in place to combat corruption. Its objective is to guide all Group employees and executives in their daily activities by providing them with the necessary practical knowledge and explaining how to act in compliance with anti-corruption rules, through a presentation of the most important rules, the situations most likely to be encountered, and the procedures to follow.

Given the wide variety of forms of corruption, the document proposes pos-

sible solutions in the form of examples of appropriate actions or responses. It should be noted, however, that the proposed responses are not set in stone; they leave considerable room for the common sense that each individual must exercise.

In practical terms, Sagemcom employees are trained and supervised to remain fully vigilant in order to:

- not to engage in bribery, directly or indirectly, in order to obtain improper commercial advantages,
- do not accept bribes, either directly or indirectly, in order to offer improper business advantages.

Corruption prevention within the company can only succeed with the active participation of all its employees—both men and women. This means that every member of the Group must commit to and engage in this effort on a daily basis, in accordance with the principles set forth in this guide. That is why training tools have been implemented, including a specific e-learning program and in-person training sessions for the staff most at risk. Initially rolled out in France, these training programs have been gradually expanded to the Group's various subsidiaries.

Sagemcom also has a specific approval process for transactions considered sensitive, particularly those involving gifts, invitations, and hospitality. These situations are governed by a dedicated Group policy, which is included in the Anti-Corruption Guide.

This policy defines:

- the types of transactions considered sensitive,
- the thresholds and conditions for acceptance or offer,
- the requirement to obtain prior approval from management or the Compliance team when thresholds are exceeded or the situation poses an increased risk,
- systematic tracking of requests and approvals.

## 2.6 Reporting channels

Certain situations may raise ethical questions or present challenges in interpretation, despite the information and resources made available to employees. The whistleblower policy allows anyone to report, in good faith, a situation, directive, or operation that they believe does not comply with the rules governing the Group's activities. Sagemcom strictly enforces a no-retaliation policy toward anyone who raises a legitimate concern.

To make it easier to report these issues, several reporting channels are available to employees and external stakeholders:

- a dedicated website: [ethics@sagemcom.com](mailto:ethics@sagemcom.com);
- a secure corporate whistleblowing platform, Whispli, accessible to anyone—whether internal or external—that enables confidential—and, where permitted by local law, anonymous—communication with the

Group's ethics team. This solution also facilitates the tracking of reports and the management of related investigations;

- a network of ethics liaisons within the entities;
- the option to contact the local Human Resources Department.

Anyone can use these reporting tools to report any issues related to:

- Theft, fraud, corruption, influence peddling, money laundering, or terrorist financing
- Conflicts of interest
- Anti-competitive practices
- Human rights violations (including those related to health, safety, discrimination, and harassment)
- Violation of data protection laws
- Failure to comply with a product safety or quality requirement
- Environmental degradation (pollution, conflict minerals, etc.).

In 2025, two reports were received, and neither revealed any confirmed cases of corruption.

Sagemcom aims to maintain an active and widely used whistleblowing system, with a target of at least two reports per year, reflecting proper adoption of the mechanism. The Group is committed to addressing 100% of reports within 60 days and to maintaining a zero-tolerance policy for confirmed cases of corruption. If a case is detected, a remediation plan is implemented within 15 days.

## 2.7 Ethics in the Supply Chain

Beyond the commitments and training and monitoring measures developed for its employees, Sagemcom has thus sought to extend its corporate responsibility commitments to its suppliers, which in 2007 led to the development of a "supplier" ethics charter to which all of the Group's partners must adhere. Sagemcom pays particular attention to the selection and monitoring (primarily through audits) of its partners, as part of an approach focused on progress and continuous improvement, directly aligned with the Group's purpose and mission (see page 8).

Corruption prevention is also a central pillar of our responsible procurement approach and is fully integrated into our sustainability strategy. Through the Group's Supplier Ethics Program, we ensure that our business partners adhere to high standards of integrity, human rights, and compliance.

From the selection phase onward, suppliers must adhere to the Group's business ethics principles. This step requires the signing of the Supplier Ethics Charter or the submission of equivalent commitments. This process helps identify potential risks and ensures that our partners share the Group's values and standards.

Systematic third-party screening is conducted using specialized risk monitoring and analysis solutions. These tools help identify potential risks related to corruption, international sanctions, or reputational controversies. The results inform a tiered risk analysis, which determines the expected level of vigilance and the mitigation measures to be implemented.

Each year, an ethical audit program is conducted for suppliers identified as the most sensitive. These audits verify compliance with the Group's requirements, particularly regarding anti-corruption measures, and assist suppliers in implementing improvement plans when necessary. The most critical situations may lead to the suspension or even termination of the business relationship.

## 2.8 Fraud Prevention

Since fraud prevention is a priority for Sagemcom, a series of rigorous measures has been implemented to detect and prevent any fraudulent behavior. Internal procedures are designed to identify anomalies and suspicious transactions at every stage of the operational processes.

Sagemcom has also launched an awareness program for employees identified as being most at risk of fraud, to equip them with the knowledge and tools needed to recognize and report any suspicious activity. Confidential reporting channels are available to allow them to report any suspected fraud without fear of retaliation.

## 2.9 Compliance with international regulations and business restrictions

Before entering into business relationships or signing contracts, Sagemcom conducts a thorough background check on its business partners, customers, and suppliers. These checks include reviewing international sanctions and warning lists, as well as conducting a reputation analysis. This provides an initial level of assurance that none of the parties involved is subject to sanctions or restrictions, or is implicated in a scandal that would preclude business dealings. To this end, Sagemcom uses up-to-date databases and specialized monitoring tools to track changes in sanctions regulations in real time. These systems enable compliance checks against international sanctions and warning lists covering more than 150 jurisdictions, as well as media sources related to compliance and ethical risk issues.

This approach allows us to remain in compliance with regulatory requirements, particularly in a context where sanctions regimes are evolving rapidly in response to geopolitical developments (including the European Union's lists, the French Directorate General of the Treasury's lists, and the OFAC SDN lists in the United States).

When sanctions are updated, Sagemcom acts quickly to adapt its practices and business relationships accordingly: for example, a "Business Res-

trictions Note” is issued regularly by management, clearly identifying the countries subject to sanctions and for which restrictions must be applied. This note specifies the countries subject to embargoes or limited restrictions and the precautions to be observed when conducting business in those countries. These clear guidelines thus enable the group to minimize the risk of non-compliance.

## 2.10 Compliance with competition rules

Sagemcom is committed to creating and maintaining a free and fair market environment, strictly adhering to applicable antitrust laws and regulations. To this end, the Group has implemented a strict “Policy on Anti-Competitive Practices” that has been clearly communicated to all levels of the organization. A dedicated fact sheet titled “Anti-Competitive Practices” has been developed, defining the main types of prohibited conduct, such as abuse of a dominant position, price-fixing, or collusion.

Finally, Sagemcom has also published a practical guide specifically addressing the risks associated with anti-competitive practices, particularly in the context of public procurement.

## 2.11 Management of Conflicts of Interest

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

- a policy and procedure for managing conflicts of interest,
- a fact sheet on conflicts of interest,
- A Practical Guide to Conflicts of Interest.

Clear guidelines for all Group employees, detailing the types of situations that could give rise to conflicts of interest—such as personal or financial relationships that might influence professional decisions—are communicated to all staff and incorporated into training programs. Sagemcom also fosters a culture of integrity that empowers employees and encourages them to report any concerns without fear of retaliation. Management plays an active role in overseeing these policies, ensuring that corrective actions are taken promptly in the event of non-compliance.

## 2.12 Compliance with Export Control Regulations

More than 80% of the Sagemcom Group’s revenue comes from countries other than France. Sagemcom is committed to complying with international, national, and local export control laws and regulations to ensure that its products, technologies, and services are not used for illicit purposes. Prior to any export, checks are conducted to ensure that the recipients, destinations, and end uses of the products comply with legal and regulatory

requirements. These checks include reviewing sanctions lists, embargoes, and restrictions specific to certain countries, entities, or individuals. Sagemcom has also implemented awareness programs for its employees to help them understand the applicable regulations. These programs cover topics such as identifying products subject to restrictions, classifying items, and the procedures for obtaining the necessary licenses.

By keeping its employees informed of the latest legislative developments, Sagemcom ensures that they have the knowledge necessary to comply with current regulations. The Group also works with external consultants and specialized legal advisors to stay informed of changes in export control regulations. This collaboration enables the Group to quickly adjust its policies and practices in response to legislative changes and ensure ongoing compliance.

### **2.13 Combating money laundering and terrorist financing**

Sagemcom has implemented robust policies and procedures to prevent, detect, and report any suspicious activity related to money laundering by maintaining a high level of vigilance. Sagemcom is strengthening its ability to detect and prevent illicit activities related to terrorist financing, in compliance with international and national laws and regulations.

To ensure the effectiveness of its AML/CFT (Anti-Money Laundering and Combating the Financing of Terrorism) program, Sagemcom has implemented rigorous Know Your Customer (KYC) processes. These processes include verifying customers' identities, assessing their risk profiles, and monitoring their transactions. Sagemcom conducts regular awareness-raising initiatives for employees in exposed roles to heighten their vigilance regarding potential signs of non-compliance, particularly with regard to money laundering and terrorist financing.

### 3. Indicators and targets related to corruption or confirmed bribery payments

#### 3.1 Operating results

Results	2022	2023	2024	2025	Goal 2030
E-learning course on corruption prevention	7,6%	9,3%	65%	99%	<b>99%</b>
Compliance Awareness Rate	N/A	100%	100%	100%	<b>100%</b>
Number of alerts received	2	2	4	2	<b>N/A</b>
Number of confirmed cases	0	0	0	0	<b>0</b>
Compliance training rate	N/A	100%	100%	100%	<b>100%</b>
Awareness of Export Controls	N/A	N/A	66,7%	N/A	<b>100%</b>
Number of compliance committee meetings held	N/A	6	10	11	<b>9 or more per year</b>

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# Supplier Relationship Management

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## 1. Supplier Relationship Management Policy

Sagemcom's procurement policy, which is shared with the Group's suppliers and subcontractors, is guided by six fundamental principles: quality, price, lead times, innovation, environmental responsibility, and ethics.

All of Sagemcom's suppliers undergo an environmental and social risk assessment using various tools (such as Reprisk, Elevate, or RBA tools), enabling Sagemcom to take a pragmatic approach to engagement and monitoring. Furthermore, the Group's suppliers have been involved in Sagemcom's CSR initiative for several years; and members of the procurement function, as the managers responsible for supplier relations, are also deeply involved in this initiative through various processes, particularly training programs implemented by the Group.

In this regard, several areas of focus have been identified within the procurement department in line with this corporate policy:

- 2007: Creation of Sagemcom's Ethics Charter; first third-party-managed CSR audit of the supply chain,
- 2011: Joined the United Nations Global Compact,
- 2016: New CSR strategy, strengthening internal knowledge and skills with two dedicated auditors in China
- 2023: 144 ethical audits throughout the year,
- 2024: 195 ethical audits during the year (3 exclusions),
- 2025: 176 ethical audits conducted during the year (4 exclusions).

Sagemcom's approach is based on continuous improvement and is designed to be positive and collaborative, with the aim of advancing the entire supply chain. Every new supplier for critical components is therefore involved in this approach.



A reputation analysis is conducted using ESG analysis tools to provide a comprehensive overview of the supplier's history. The results obtained allow us to make an initial assessment of the supplier's compliance and identify areas for improvement. Once a business relationship is established, each supplier signs the ethics charter and is required to comply with its rules and provide the necessary documentation during audits. These audits are not only key steps that confirm a supplier's status but also enable us to jointly develop an improvement plan to achieve the desired level. The results of these audits are factored into the overall supplier rating, which influences the allocation of market share, thereby rewarding the most ethical suppliers.

To reinforce this commitment, Sagemcom joined the Responsible Business Alliance (RBA) in 2022 to contribute to the electronics industry's collective effort by aligning its working methods and leveraging the synergies offered by this alliance in terms of audits and monitoring.

With regard to conflict minerals, Sagemcom participates in the Responsible Minerals Initiative (RMI) and works with other companies and stakeholders to improve traceability and ensure responsible sourcing of minerals.

## 2. Actions and resources related to supplier relationship management

### 2.1 Ethics Charter

The Sagemcom Group's Ethics Charter is based, among other things, on the International Labour Organization's (ILO) international labor conventions, the Universal Declaration of Human Rights, the UN Convention on the Rights of the Child, as well as the RBA Code of Conduct (see the section on the Ethics Charter in the "Workers in the Value Chain" section on page 103).

### 2.2 On-site audits

Based on a comprehensive risk analysis that takes into account the manufacturing location, the technologies used, and the processes involved, audits are scheduled annually to verify the status of suppliers on our procurement panels and to support them in their improvement efforts. As a result, 176 audits were conducted in 2025 across various supplier panels to gain the most comprehensive view possible of our supply chain. These audits include 185 checkpoints, some of which require closer attention and guide our engagement with suppliers:

- **That's a deal-breaker**
  - child labor,
  - forced labor,
  - life-threatening risk,

- falsified data,
- refusal to cooperate.

- **This is unacceptable—it must be corrected immediately**

- Unregulated chemicals
- Locked dormitories / no emergency exit
- Discrimination
- Corporal punishment, physical or mental abuse
- Lack of operating permits (Env)

- **What is critical: to be corrected as a priority**

- Unsafe working conditions
- Poor living conditions (unsanitary dormitories, etc.)
- Excessive working hours
- Minimum wage violations
- Lack of anti-corruption procedures

To ensure the most comprehensive overview possible and to guarantee an independent verification, Sagemcom engages third-party auditors for a supplier's initial audit. A Sagemcom auditor regularly accompanies these audits, which facilitates subsequent follow-up by providing a better understanding of the files and any non-conformities identified. Once the audits are completed, the auditors prepare a comprehensive report for the supplier. In the event of non-compliance, Sagemcom requests a corrective action plan and conducts the necessary follow-up audits. If the corrective actions are deemed insufficient, a new audit is initiated. A lack of progress in successive audits leads to a reassessment of the business relationship between Sagemcom and the supplier.

If any non-compliance issues identified are deemed to be deal-breakers (child labor, forced labor, falsified data, refusal to cooperate, or working conditions that endanger employees' lives), Sagemcom will terminate all business relations with the supplier. The supplier will then be delisted and "blacklisted" within the Group.

These audits also provide an opportunity to engage more broadly with suppliers regarding their practices in order to support them in their improvement processes, by providing them with performance metrics and sharing best practices observed elsewhere. These indicators, in particular, are valuable tools for tracking suppliers' progress and establishing a shared vision of the goals to be achieved. As a result, significant progress has been observed among the Group's main suppliers, particularly in protecting the health and safety of their employees worldwide.

Process audits and quality audits—which also include checks on environmental, health and safety, and ethical standards—are conducted in parallel to identify high-risk suppliers and trigger additional follow-up audits.

## 2.3 Environmental Management with Suppliers

The environmental impact of our suppliers is a significant component of our Scope 3 emissions, so it is essential that we work with supply chain partners to reduce their carbon footprint. For the past three years, Sagemcom has been working with the CDP to assess our suppliers' carbon strategies and performance. This approach allows us to verify that our suppliers are aligned with our decarbonization strategy and to evaluate the results they have achieved.

In 2025, we surveyed more than 85% of our suppliers (by revenue). 80% of our production suppliers achieved a satisfactory score (A, A-, B, or B-) according to the CDP scoring method, compared to 48% in 2024. Building on this finding, we have launched an in-depth initiative with key suppliers to accelerate their decarbonization through increased use of renewable energy and more precise measurement of impacts via Life-cycle analysis of components. This will enable us to clearly and justifiably highlight the efforts made in our carbon footprint assessments.

In line with our decarbonization goals, our objective is to achieve a net zero supply chain by 2040.

## 2.4 Inventory and traceability of chemicals used in components

To ensure product compliance with various European directives, including the REACH Regulation (1907/2006) and the RoHS Directive (2011/65/EU), Sagemcom has implemented an extremely rigorous chemical management system, which begins with a comprehensive inventory of all substances used in manufacturing facilities and in the components employed. A dedicated traceability system for SVHCs (Substances of Very High Concern) has been implemented to determine the content of substances of very high concern in products.

Through this tool, Sagemcom asks its suppliers to provide information on the SVHC content of the materials they use. Since the SVHC list is updated every six months by ECHA (European Chemicals Agency), suppliers are periodically asked to provide updated information. They are asked to provide complete physicochemical descriptions so that we can identify all substances present in the components. Once the information is received, it is aggregated into a database

This research covers the Group's entire supply chain, which includes several hundred suppliers and tens of thousands of components. Finally, the Group's production facilities, particularly those in Tunisia, are equipped to conduct RoHS compliance testing, specifically for the various phthalates prohibited by the regulations.

## 2.5 Policy on Conflict Minerals

Sagemcom's policy on conflict minerals is part of the company's broader commitment to responsible sourcing and sustainability. Conflict minerals generally include tin, tantalum, tungsten, gold, and cobalt, which are mined under conditions of armed conflict and human rights violations, primarily in the Democratic Republic of the Congo (DRC) and neighboring countries. Analysis of the composition of Sagemcom products and electronic products in general shows that these minerals are widely present, which poses a risk particularly in components (tin for soldering, gold for internal bonding and certain surface treatments, tungsten for certain mechanical properties, tantalum for specific capacitors, cobalt for batteries, etc.).

Sagemcom, in an effort to avoid contributing to armed conflicts or human rights violations through its mineral supply chain, is committed to ensuring that the minerals used in its products come from responsible sources.

To this end, the Group requires its suppliers to exercise due diligence regarding the source and supply chain of minerals. This due diligence is consistent with the framework established by the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. To maintain transparency in its mineral supply chain, Sagemcom participates in the Responsible Minerals Initiative (RMI) and collaborates with other companies and stakeholders to improve traceability and responsible sourcing of minerals. As a member of the RMI, the Group expects its suppliers to share information on the origin of the minerals used in products supplied to Sagemcom and to take the necessary steps to remove non-compliant refiners.

Sagemcom also publicly reports on its policies and practices regarding conflict minerals to ensure that its stakeholders are informed of its efforts and progress.

As part of its ongoing efforts to improve its conflict minerals program, Sagemcom regularly reviews and updates its policies and practices in line with emerging best practices and evolving industry standards. By implementing these measures, Sagemcom aims to minimize the risk of sourcing 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 when non-compliant refiners are identified, Sagemcom requires its suppliers to take steps to bring them into compliance or, if this is not possible, to terminate business relations with them. To support this initiative, the relevant group of buyers has been trained on this issue. Furthermore, this issue is reviewed during our CSR audits of suppliers to verify the adequacy of their traceability systems and

the accuracy of their declarations. As this issue is constantly evolving, we update our screening system in accordance with RMI recommendations, which includes accounting for new minerals such as copper, graphite, lithium, mica, and nickel.

## 2.6 Critical raw materials

Since 2011, the European Commission has been compiling a triennial list of raw materials that are critical to the European economy as part of its Raw Materials Initiative, launched in 2008. On this list, 27 raw materials were identified as critical in 2020.

Sagemcom is committed to understanding the use of these materials in its products. This naturally involves identifying all the substances present in each of the components they contain. In doing so, Sagemcom identifies potential uses and works to diversify its supply sources, both geographically (the origin of the materials) and technologically (alternative solutions).

Within a single product, the significance of these materials may vary, particularly depending on the number of high-risk components involved. A detailed analysis of their use makes it possible to assess their strategic importance to the Group and to incorporate this issue into its risk management strategy.

## 2.7 Inspections

Environmental protection is a key focus of our supplier audit strategy (described in the chapter on workers in the value chain).

Each audit provides an opportunity to verify the supplier's compliance with local environmental regulations and Sagemcom's requirements.

In particular, we check the following:

- The existence of ISO 14001 certification (or equivalent),
- The supplier's regulatory compliance,
- Waste and emissions management,
- Reducing consumption,
- Pollution control,
- Risk management,
- Greenhouse gas measurements,
- The management of hazardous substances,
- The implementation of requirements throughout their supply chain.

Our R&D team also verifies that components meet environmental requirements by obtaining proof of compliance (including third-party laboratory analyses) prior to product design to ensure that only compliant components are used. Our factories are also involved in this compliance process, with inspections conducted upon receipt using our in-house testing laboratory, which is equipped to detect the presence of any type of substance through X-ray fluorescence and/or chromatography analysis.

### 3. Indicators and targets related to supplier relationship management

In 2025, the goal was to audit at least 90% of the Group's total procurement volume across its 19 critical panels. This goal was achieved with coverage of over 97%, a level to be maintained in 2026. In the longer term, the goal is to help all suppliers improve so that all are at Level A or B according to the JAC methodology by 2030. This indicator is audited by a third party as part of the Group's status as a mission-driven company.

With regard to conflict minerals, whenever the RMI (Responsible Minerals Initiative) conflict minerals reporting template is updated, and whenever new components are qualified, suppliers must submit a CMRT (Conflict Minerals Reporting Template). Company-level CMRTs are also acceptable, although they may result in uncertainty regarding the presence of certain minerals. In 2025, Sagemcom obtained a CMRT for nearly 96% of the components purchased during the year.

	2023	2024	2025
Percentage of components covered by a valid CMRT	95%	96%	95,92%
Percentage of components covered by a valid EMRT	95%	96%	95,25%
Objectives	95%	96%	97%

By 2026, the goal is to collect information on at least 96% of purchased components, and 99% by 2030.

Types of audits	Status	Note	2024 Number of supplier sites	2024 Percentage of results	2025 Number of supplier sites	2025 Percentage of results	Goal 2030
Follow-up audits	As expected	A/B	33	64%	96	72%	94% of A/B testing providers
		C	10	20%	12	9%	
	Does not meet expectations	C	1	16%	6	5%	
		D	7		19	14%	
	Non-compliant → removed from the panels	D	Exclusion based on CSR results: 3		Disqualification based on CSR results: 4		
<b>TOTAL</b>			<b>54</b>		<b>133</b>		
Initials	New suppliers	A/B	65	47%	15	35%	
		C	20	14%	11	26%	
		D	54	39%	17	39%	
<b>TOTAL</b>			<b>139</b>		<b>43</b>		

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