tessi

Duty Of Care Plan 2022

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1. Introduction

French Law No. 2017-399 of 27 March 2017 on the duty of vigilance of parent companies and ordering companies (the "Duty of Vigilance Act") introduced the obligation, for parent companies of groups employing more than 5,000 employees in France or 10,000 employees in France and abroad, to establish and effectively implement a vigilance plan.

This plan must include "reasonable due diligence measures to identify risks and prevent serious violations of human rights and fundamental freedoms, the health and safety of people and the environment" that may result from the activities of the Group and its subsidiaries and those of suppliers or subcontractors with which Tessi has an established business relationship.

This obligation is based on five measures:

- Risk mapping (identification, analysis, prioritization)
- Procedures for regularly assessing the situation of subsidiaries, suppliers and subcontractors
- Appropriate actions to mitigate risks or prevent serious breaches
- A mechanism for alerting and collecting reports relating to the existence or occurrence of risks
- A system for monitoring the measures implemented and assessing their effectiveness.

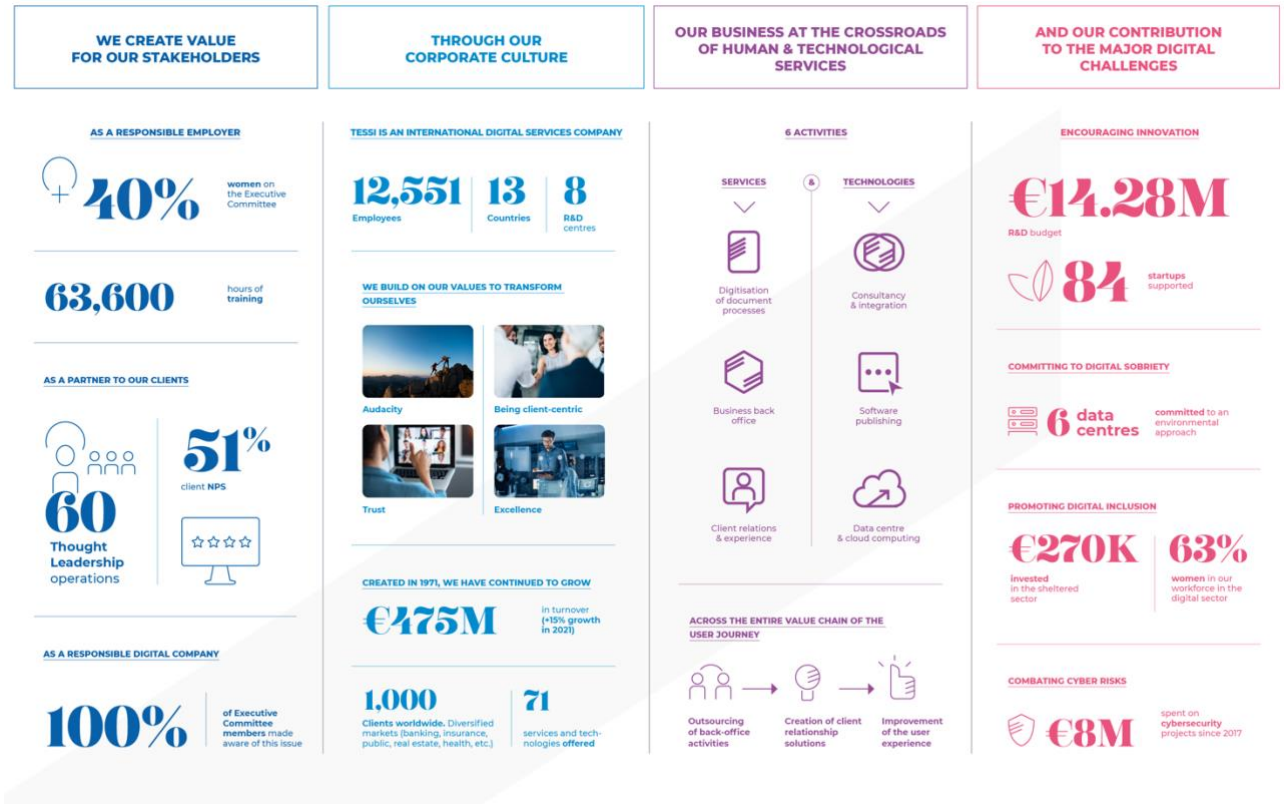
Tessi meets the requirements of the Duty of Vigilance Act by establishing this vigilance plan.

1.1 The Tessi group, a major player in Business Process Services (BPS)

Tessi specialises in digitization, the optimization of business processes and corporate customer experience. We support our customers in their outsourcing and digital transformation projects. We are a true digital services company and offer our customers a wide choice of outsourced services combining technology, innovation and human expertise to support these solutions.

A leading player in digital transformation services in France and 15 countries around the world, Tessi and its 13,000 employees have been supporting companies for more than 50 years in optimizing their business processes. Operating throughout the value chain, we offer partial or total delegation services in order to improve the efficiency of each process. Our services range from outsourcing back-office operations (document management, invoice processing, etc.) to creating customer relationship solutions and improving the user experience. Generating real added value for our customers, our solutions fully combine services with technology.

1.2 Business model and value chain



Business Process Services

Customised solutions at the heart of your value chain

Services

- Digitisation of document processes
- Business Back Office
- Customer relations & experience

We combine service and technology with the single aim of

streamlining user journeys and associated processes.
As a trusted third party, we offer partially or totally delegated management services.

Technologies

- Consulting & integration
- Software publishing
- Data center services & cloud computing

Digitisation of document processes

Documents

- Digitising incoming multi-channel flows
- Electronic document management
- Electronic archiving
- Onboarding & subscription
- Digitisation of human resources
- Digitising promotions
- Desktop publishing, outflows and direct marketing

Payments

- Electronic invoices for customers and suppliers
- Collection and lettering
- Bank processing of cheques
- Monitoring & legal information
- E-declarations

15 **Industrial centres in Europe**

- ISO 9001-certified processing centres
- Dematerialization and electronic archiving NF461
- Automated capture and control technologies
- ISO 27001 and HDS secure hosting

- Conformity, traceability of flows, reliable copy
- Information sharing, access and dissemination
- Productivity gains
- Up to 35% cost reduction

Business Back Office

Partial delegated management

- casualty insurance & Claims
- Inactive accounts & escheat
- Credits
- Legal back office
- Saving
- Factoring
- Annual declarations
- Credit cards
- Retirement factory
- KYC & fight against fraud
- Health insurance

Total delegated management

- Mortgages
- Real Estate services
- Health and personal risk
- Back-office cheques

6000+ **Business experts in Europe**

- ✓ Front-to-back process Outsourcing
- ✓ Services in a Tessi Center or on Client Site
- ✓ Partial or total management delegation

- Conformity of processing and management acts
- Commitment to results
- Cost variability and business flexibility
- 20% to 35% financial gains

Customer relations & experience

Customer relation

- Customer relation / ADM Value

Multi-channel client relationship

- Customer services
- Collection operations
- Social networks
- Customer care

Relational marketing

- Design and management of relationship programmes
- Lead management
- Managing campaigns

Activations & shopper marketing

- Experience marketing and partnerships
- Events
- Customised objects and sampling

4500 **client advisors in Europe**

- ✓ contact centres ISO 18295-1 certified
- ✓ Multi-lingual services
- ✓ A GDPR compliant multishore presence

- A 360° customer view
- Agiles and multi-channel courses
- Flexible and reactive management of your campaigns
- A unique and flawless customer experience

Software publishing

Document management
- Enterprise Content Management
- GED / Workflow / Case management
- Outgoing multi-channel letters

Payment
- Digitise your tax invoices
- Cashing small amounts
- Multi-channel payment portal
- Cheque flow management

Security & digital confidence
- Electronic signature
- Digital subscription
- Document security and Content protection
- Internet security and Digital ID

Business solutions
- Health and personal risk management
- Bank accounts and financial products
- CRM & marketing automation

CRM & marketing automation

TOP 35 software publishers in France (Truffle 100)

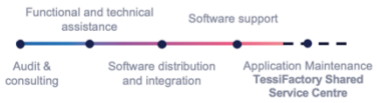
- ✓ 9 R&D centers in Europe
- ✓ More than 120 developers and technicians
- ✓ Digital Trust Operator and Certification Authority

- A wide range of solutions
- Hosted or On-Premise Solutions
- Compliance with digital and business compliance
- Openness and interoperability with client IS

Consulting et integration

Optimising information management processes & Improving the customer experience

- Content Services
- Case management
- CCM/CXM
- Interactive conversation guide
- Consulting



130 Consultants

- ✓ A European presence in 4 countries
- ✓ Auditing, project management, project management, integration
- ✓ Partnerships with leading ECM/CCM publishers

- Your information systems decompartmentalized
- Transformed, multi-channel customer journey
- Personalized interactions
- Seamless GDPR compliance

Data center services & cloud computing

Private cloud
- Dedicated server and network infrastructure
- Back-office services only
- Banking, Insurance
- Scanning services
- Long-term electronic archiving

Hybrid cloud
- Dedicated solutions or shared infrastructure
- Backoffice services and external clients
- Web client and dedicated servers

Public cloud
- Backoffice services and external clients
- API or webservices
- Web client

6 Data centers in Europe

- ✓ Tier III classification, 24/7 video surveillance
- ✓ ISO 27001-2013 and HDS certifications
- ✓ 60 Service Centre experts, 25 Cloud expert engineers
- ✓ 2 000+ hosted client applications
- ✓ 3 000+ managed servers, 5 petabytes of data managed

- Highly secure architecture
- GDPR compliance and health data hosting
- Highly available applications (99.7%)
- ANSSI-certified time stamping services

Our commitments

e-compliance

- GDPR Ready !
- **ISO 9001 and ISO 18295-1** certification for Tessi production sites
- **Quality, Compliance and Security** approach
- **Regulatory** compliance (Bâle III, Eckert Law, Allure, etc.)

e-confidence

- Certified **Digital Trusted Operator** and Certification Authority ANSSI
- **NF461** Certification: reliable copy and archiving for legal purposes
- Hosting: **ISO 27001 and HDS** (French Health Data Host) certification
- Member of e-Futura, FNTC, AFNOR commissions, etc.

eco-responsibility

- Tessi member of the **UN Global Compact** since 2011, contributing to the SDG's
- **Member of the INR**, signing, the charter for a Sustainable, IT.
- Signatory of the **Diversity charter** & of the **Manifesto for the inclusion of women in digital.**
- **Ecovadis. 2022** - Silver status.
- Annual publication of our **Sustainable Development Report.**

1.3 Scope

The vigilance plan covers all the activities of the Group and its controlled subsidiaries established in France and abroad, as well as those of its subcontractors and suppliers with which it has an established business relationship.

2. Steering and governance of the duty of vigilance

The general management of the Tessi group has decided **to steer its vigilance plan** and its ethics and compliance policies by with the help of its Compliance, Cybersecurity, Human Resources and CSR departments.

2.1 Governance of Group compliance

Tessi has set up a Group Compliance function in order to **promote the convergence of practices within the Group and its subsidiaries with regard to legal compliance.**
Its missions include:

- Building, managing and coordinating compliance programs within the Tessi group
- Ensuring the implementation of compliance programs by all subsidiaries

2.2 Reference framework

The reference framework developed by Tessi for its compliance programs is based on:

- Risk mapping
- A code of ethics
- Procedures (evaluation of subcontractors and suppliers, risk management, internal control and audit, HR, CSR, etc.)
- Environmental commitment initiatives (circular economy, ecomobility, energy management, etc.)
- A responsible digital charter
- A whistleblowing and reporting mechanism

Intended for all employees of the Tessi subsidiaries worldwide, the code of ethics aims to:

- Ensure the integrity of the Group
- Formalise ethical commitments that are binding on employees
- Help them make the right decisions, in any place and under any circumstances

All Tessi employees, regardless of their position and level of responsibility, must read and understand this code and undertake to comply with it. In the event of non-compliance with the ethical code, they risk disciplinary action.

2.3 Steering of the duty of vigilance

Compliance with the duty of vigilance will be ensured through the following bodies:

Committee	Meeting frequency	Members
Group Risk Committee	Once/year	• Group CEO • Group Internal Audit Department • Compliance Department • Cybersecurity Department • Legal Department • HR/CSR Department
Management reviews	Twice/year	• Group CEO • Group Internal Audit Department • Compliance Department • Legal Department • HR/CSR Department
BU/subsidiary compliance steering committee	4 times/year	• Corporate Compliance Officer • BU/Subsidiary Compliance Liaison Officer • HR/CSR • BU/Subsidiary CEO
BU/subsidiary compliance project monitoring committee	Once/month	• Corporate Compliance Officer • BU/Subsidiary Compliance Liaison Officer

2.4 Dialogue with stakeholders

The Group continuously discusses corporate responsibility and due diligence issues with all its stakeholders, as presented below:

Stakeholders	Key issues	Main expectations with regard to Tessi	Modes of dialogue
Investors, shareholder, rating agencies	Valorization, sustainability and values	Return on investment Identification, management and anticipation of risks Governance Business ethics	Supervisory board investor conferences and meetings Responses to rating questionnaires
Public authorities & local communities	Regulatory framework and social acceptability	General interest	Meetings with local authorities Meetings with professional associations, public bodies supporting professional integration and return to employment, Participation in exchanges, debate evenings with the Ministry for the Ecological and Solidarity Transition "10% to change everything" coalition Global Compact France Ambassador.
Social partners	Social dialogue	Information and consultation on the Group's social policy, economic and financial situation and strategic orientations	Annual consultations Economic and Social Committee BDESE (social, economic and environmental database)
Employees, future employees & social partners	Involvement and loyalty	Need for recognition Attractiveness Skills development Corporate culture Health and safety at work Diversity Well-being at work Awareness Corporate responsibility	Internal communications: intranews, internal corporate social network, internal challenges, posters, team meetings HR websem Video conferences Satisfaction questionnaires and surveys E-learning platform: CSR e-learning module CSR presentation in on-boarding process Job and internship forum Presentations at specialized conferences External social networks: Linkedin, Twitter, Welcomtothejungle, etc. Website

Stakeholders	Key issues	Main expectations with regard to Tessi	Modes of dialogue
Customers	Engagement, partnership and loyalty	Innovation and adaptability Quality of products and services Responsiveness Compliance with contractual requirements and regulations Environmental compliance energy management, Constant attention and dialogue Security and data protection Business ethics	Partnership relationship: assistance in defining needs, regular dialogue via customer management. Newsletters Customer satisfaction surveys Responses to supplier ratings (EcoVadis, Acesia) Web seminars, showcase of digital transformation, mornings covering business and sector-specific themes (Banking, Insurance, etc.) White paper on the digital transformation of companies Open day for its Lab and CETIA (Tessi Center of Excellence in Intelligent Automation) Launch of "Tessi Insights", the blog on the digital transformation of business processes CSR and Responsible Digital Technology Workshops
Suppliers / subcontractors	Quality, costs, deadlines, ethical compliance, CSR	Sustainable partnership Profitability Business ethics Loyalty	Supplier surveys and audits Tessi Sustainable Development Charter Code of ethics Assessment of supplier compliance Contracts with suppliers contain clauses concerning CSR, anti-corruption, personal data processing, security, etc.
Media & international organizations and associations	Image and reputation	Transparency Information CSR Commitments	Member of Global Compact France. Specialized press testimonials Press releases Annual Communication in Progress (COP) – GC Advanced level Partnerships with local non-profit organizations

3. Whistleblowing system

The Tessi group has set up an internal whistleblowing system that allows all its employees – internal, external or occasional (permanent, fixed-term, apprentices, trainees, temporary subcontractors, suppliers, etc.) – to:

- Seek ethics advice
- Report unethical behaviour or situations, such as:
  - Non-compliance with laws, regulations or the general interest
  - Violations of human rights and fundamental freedoms
  - Acts of harassment or discrimination
  - Non-compliance with occupational health, hygiene and safety rules
  - Environmental damage
  - Acts of corruption, influence peddling or fraud

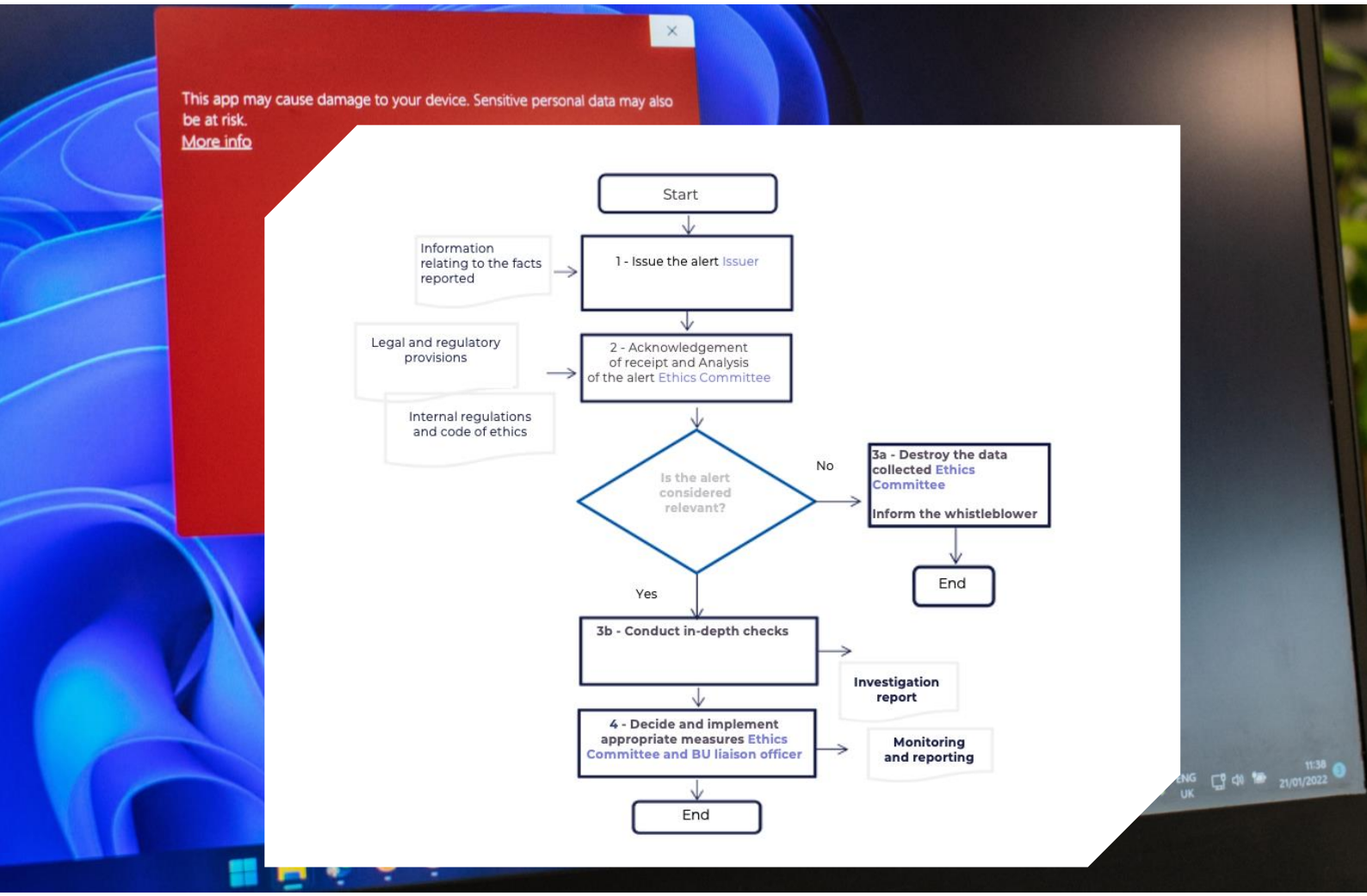
No.	Alert categories	Alert subcategories
1	**Discrimination**	Discrimination
2	**Harassment**	Bullying
3		Sexual harassment
4		Cyber Harassment
5		Sexist behaviour
7		Violence
8	**Human rights and fundamental freedoms**	Human rights and fundamental freedoms
9	**Environmental protection**	Environmental protection
10	**Occupational health, hygiene and safety**	Occupational health, hygiene and safety
11	**Corruption**	Influence peddling and corruption (e.g. benefits in kind, bribes, inappropriate gifts, etc.)
12		Conflict of interest
13	**Fraud**	Fraud by an employee: (examples: wage/bonus fraud, falsification, misappropriation, financial irregularity or breaches of accounting or tax provisions, fictitious declarations, identity theft, fraudulent use of internal services, etc.)
14		Fraud by a third party: (e.g. inflated supplier invoices)
15		Insider trading
16		Theft by an employee (e.g. theft of data, physical documents, theft of equipment & misappropriation of assets, etc.)
17		Theft by a third party (e.g. data theft, physical documents, equipment theft, etc.)
18	**Other type of alert**	Lack of political neutrality
19		Lack of transparency of information
20		Other

To facilitate alerts, Tessi provides employees with a platform accessible online in French, German, English and Spanish at: https://tessi.signalement.net. Its use is optional.

This platform makes it possible to:

- Secure the process for collecting and processing alerts regarding ethics
- Give employees confidence in the system in place
- Equip members of the ethics committee with a reliable and efficient collaborative tool

The alert processing process is as follows:



Tessi guarantees the absence of retaliation against any whistleblower who raises an alert in good faith: all whistleblowers benefit from specific protection as provided for by the legislation in force. Tessi thus guarantees the absence of retaliation against any whistleblower who raises an alert in good faith. Any misuse of the system may, however, expose the perpetrator to disciplinary action.

The Ethics Committee is responsible for handling internal alerts. It receives and analyses the alerts reported to it. It is composed of the following members:

- The General Counsel
- The Compliance Director
- The Compliance Officer
- The Internal Audit Director
- The Group HR Director
- The Group CSR manager

The internal whistleblowing system and the organization, means and procedures for processing alerts put in place by Tessi are described in the procedure.

4. Risk identification system

In accordance with the requirements of the Duty of Vigilance Act, Tessi has conducted a specific risk identification and management exercise, based on its CSR and Compliance risk maps, with regard to the requirements of the duty of vigilance. The Group is thus able to:

- Identify and formalize its main risks relating to the duty of vigilance
- Design and manage mitigation measures for identified risks

The identification and ranking of risks associated with the duty of vigilance is consistent with the Tessi group's multi-factor risk management system managed by the Group Internal Audit department. It covers all Group subsidiaries/entities and all its processes (18 themes).

The process for drawing up our risk maps is set out in detail in the Non-Financial Information Statement 2021 – Chapter 3.

4.1 Risk identification and assessment methodology

Tessi group has adopted a specific qualitative approach to identify and assess risks related to corporate social responsibility, including its duty of vigilance regarding the activities of its subsidiaries and stakeholders. Individual interviews have therefore been conducted with a representative panel of its stakeholders (see Chapter 3 Methodology Materiality Analysis – Non-Financial Information Statement 2021). Joint work between the Group's Internal Audit, Compliance, HR and CSR departments has identified 25 risks relating to the Duty of Vigilance.

Risks were also identified by taking into account the following texts and guidelines:

- The French Constitution and the "constitutionality corpus", composed of the 1789 Declaration of the Rights of Man and of the Citizen, the Preamble to the Constitution of 27 October 1946 and the 2004 Environmental Charter
- The Universal Declaration of Human Rights
- The ten principles relating to respect for human rights and the Sustainable Development Goals (SDGs) defined by the United Nations Global Compact (UN)
- The OECD Guidelines for Multinational Enterprises
- The fundamental conventions of the ILO

4.2 Main risk categories identified

The risks were assessed in relation to the main impact categories listed below:

- Environmental risks
- Human and social risks
- Strategic risks
- Operational risks
- Financial risks
- Legal risks
- Image risks

The duty of vigilance risk mapping is **regularly updated in line with changes in the Group's business, and at least once a year**. The Group is thus able to identify new risks and analyse changes in its exposure to existing risks.

Among the internal and external factors that could determine this update are the following:

- Changes in the business model
- Changes to risk reference frameworks, processes, tools, indicators and operational guidelines
- Changes in the regulatory or economic context
- The implementation of new offers
- A merger-acquisition transaction
- Changes in management or key functions
- Major incidents

The risk assessment process follows the steps below to ensure its robust implementation:

- Identify, assess, prioritize and manage compliance/security risks
- Identify feared events
- List the risk factors that may encourage the appearance of feared events
- Assess the probability and impact of each risk factor without taking into account the risk management means already in place (gross criticality)
- Assess the gross risk (gross criticality)
- Define the priority areas for deploying risk control resources
- Assess the residual risk (residual criticality) taking into account the means of control
- Inform and give general management the necessary visibility to implement risk mitigation measures proportionate to the issues identified by the mapping

5. Presentation of non-financial risks concerning the group's duty of vigilance

5.1 Risk matrix

Top 13 risks
Human rights
Risks associated with compliance with local labour law and international labour standards across our value chain
Risks associated with compliance with anti-discrimination regulations and promoting diversity
Risks associated with compliance with working conditions
Risks associated with respect for individual freedoms
Risks related to personal data protection and privacy
Environment
Climate change risks (environmental consequences of our activities and consequences of climate change for our business)
Risks associated with meeting global and national carbon emission reduction targets
Risks associated with not controlling our consumption of resources
Risks associated with not controlling non-carbon energy consumption
Health and safety at work
Fire risk
Physical risks: noise, risk machines, fire in the premises, hygiene, etc.
Physical risks associated with external third parties (intrusion, security in the immediate vicinity of the site).
Risk of arduous working conditions (unsafe working environment, noise pollution, unsuitable working hours, etc.)

6. Regular value chain assessment procedures

We are aware of the impact of our business on the economy, the environment and society and we are working to define a responsible approach in the context of our relations with our suppliers and subcontractors through:

- Our contribution to the economic and social development of the regions by creating and maintaining employment for people who are excluded from the labour market or who have disabilities
- The use of socially responsible subcontracting through structures in the sheltered employment sector: in 2021, nearly €270,000 has been spent on establishments and employment assistance services
- Solidarity partnerships with associations such as the Association des Paralysés de France
- The inclusion of sustainable development criteria (environmental, social and societal clauses), adapted to the context of our markets, in our calls to tender
- Assessing and supporting our suppliers in their CSR performance

To assess the practices of its subsidiaries and sites, the Tessi Group has developed an internal control and audit system based on 3 levels of control:

- **Level 1 controls:**
  - Ensuring the smooth running of the day-to-day processing of business services
  - These controls concern production processes by type of activity as well as cross-functional processes such as HR or occupational health and safety processes with regard to the duty of vigilance
  - Conducted by the Quality and Safety Center managers at site level
- **Level 2 controls** aimed at:
  - Checking the level 1 controls
  - Ensuring that compliance processes and measures are properly applied within subsidiaries and cross-functional and support departments
- **Level 3 controls** carried out each year by the audit in order to conduct:
  - Sample controls of the reliability of the level 2 controls
  - Direct verifications of compliance with the processes in force

Tessi is drawing up a three-year control plan gradually deployed according to the types of suppliers [see section entitled “management of supplier-related risks”]

Furthermore, particularly in France, Tessi, as a “Core Outsourced Service Provider” undertakes to:

- comply with all the regulations in force concerning its business
- comply with standards and certifications strategic for its customers

Through:

- Certifications to international standards (ISO standards). Examples: ISO 27 001, ISO 9 001, ISO 18 295-1
- Certifications to national standards. Examples: Afnor, NF 461, NF 544
- Specific certifications, in particular regarding hosting health data (HDS) and Qualiopi

7. Risk management actions

To manage the risks identified as part of the duty of vigilance, Tessi relies on its social, environmental and ethical responsibility policies and commitments, and in particular:

- **The sustainable development policy**
- The commitments related to this policy, which are reflected in particular in its membership of the United Nations Global Compact since 2011
- **The code of ethics**, integrated into its Societal Responsibility policy

7.1 Risk management within the Tessi group

7.1.1 Environmental risks

As part of its CSR roadmap, Tessi has set itself the priority task of **controlling and reducing the environmental impact of its business** by:

- Measuring the carbon footprint of its activities
- Reducing its direct and indirect greenhouse gas (GHG) emissions
- Optimizing energy consumption in the management of its business.
- Contribution to the circular economy by optimizing, recycling and recovering its waste
- Taking into account the environmental impact of its digital solutions

7.1.2 Focus on environmental policy[1]

The Group pursues a simple and effective environmental policy, based on taking into account the most significant environmental aspects of its business.

7.1.2.1 Measuring the carbon footprint of activities

In 2019, Tessi carried out its first carbon audit, also including indirect CO_2 emissions from its business, which are considered significant. The Tessi group is defining its climate strategy by renewing its carbon audit (Scope 1, 2 and 3) in 2022 over the full scope of its business (international scope), with a focus on the footprint of its digital equipment.

This audit will be supplemented by the definition of a low-carbon trajectory and action plan aligned with the global objectives set by the Paris Agreements and the Science Bases Target Initiative.

7.1.2.2 Reducing greenhouse gas emissions

By optimizing and reducing energy consumption

In 2021, Tessi achieved its objective of reducing its electricity consumption by 5% of the electricity consumption ratio relative to the workforce in France (target set in 2017).

The main measures implemented were:

- Virtualization and therefore a reduction in the number of servers
- The development of low energy consumption production centers (*relamping*)
- Improving the energy performance of new tertiary buildings
- Widespread use of collaborative tools to limit the sending of emails and large documents
- Raising employee awareness of environmentally responsible actions
- Rationalization and securing of printing
- The shutting down of workstations
- The integration of environmental performance requirements for its *data centers* and hosting partners

In 2022, additional measures to existing actions are needed to meet government demands and the expected pressures on the electricity grid over the winter.

They will enable us to optimize our energy consumption by deploying good reflexes and best practices and thus achieve new targets of reducing our energy consumption by 15% in 2023, thereby reducing our carbon footprint:

1. Appointment in each French establishment of an “energy efficiency ambassador” to guarantee the energy performance of their establishment
2. Creation of “energy efficiency and work organization” working groups, including employee representative bodies, for each establishment
3. Deployment of an energy performance management platform for our French centers, enabling real-time management of our consumption
4. Inclusion of the “energy efficiency ambassadors” in the Ecowatt* shutdown vigilance alert

[1] The actions described below are a summary of the environmental measures implemented by Tessi. For more information and operational examples, refer to the TESSI Non-Financial Information Statement.

5. Distribution of generic practical guidelines to be applied to each of our establishments, concerning heating and air conditioning, lighting, digital devices and mobility
6. Awareness campaign for all our employees regarding everyday eco-friendly actions to be applied in their workplace or at home
7. In the event of expected high demands on the network, forwarding of red Ecowatt* signals to our establishments and triggering of additional actions to reduce our electricity consumption

7.1.2.3 Contributing to the circular economy by optimizing waste recycling and recovery

In 2021, 90% of the Tessi group's staff (worldwide, excluding ADM Value) operate on sites with a recycling channel. Each year, Tessi continues to support each of its sites individually to enable them to adhere to the agreements put in place with service providers to set up selective sorting.

With regard to electrical and electronic equipment, Tessi maximises its service life and works with specialized suppliers that collect and manage the reconditioning, recycling or reuse of this equipment.

In France, all equipment (WEEE) goes into recycling and/or reuse channels through its service provider Recyclea (sheltered company).

Servers and hard drives follow a different procedure with secure erasure before dismantling and the recycling of any components that can be.

7.1.2.4 Reducing the travel footprint

In 2018, Tessi began implementing mobility plans for all its establishments for more than 100 employees, reflected in:

- The roll-out of a business travel policy for all Group subsidiaries;
- Services offered to employees, such as the sustainable mobility package for employees in France;
- Installation of charging terminals for electric vehicles;
- Organization of regular or occasional carpooling;
- The evolution of the corporate vehicle fleet towards hybrid or electric vehicles.

7.1.2.5 The deployment of a responsible digital approach in the development of solutions

Aware of the environmental impact of its business sector, Tessi is now committed to measuring and also reducing the environmental footprint of its solutions, offers and applications, through the **"Responsible Digital Technology" program**. This has 4 components:

- **Raising employee awareness of the challenges of responsible digital technology**: since 2021, Tessi has taken part in *Cyber World Clean Up Day* to raise employee awareness of digital pollution; a Fresque du Numérique workshop whose teaching is similar to that of the Fresque du Climat was organized for members of the Tessi Executive Committee and a Responsible Digital Technology module provided by Tessi Academy in the form of e-learning or virtual classes (all employees) was developed
- **Increasing the skills of business experts** so that they integrate the criteria of simplicity, eco-design and accessibility into the development of solutions offered by the Group
- **Measuring and optimizing the footprint of IT equipment, infrastructures and digital solutions and applications**: in 2021, 25% of the Group's proprietary solutions incorporate one or more digital efficiency criteria by default
- **Ensuring recognition of the Group's approach** with benchmark institutions or bodies in the sector, such as Numéum (formerly Syntec Numérique) or the Institut du Numérique Responsable

Since 2020, Tessi has joined the Planet Tech'Care initiative[2] with Syntec Numérique (https://www.planet-techcare.green/).

In 2022, Tessi **signed the charter of the Institut du Numérique Responsable and became an active member (participation in working groups)**

[2] The Planet Tech'Care initiative brings together players in responsible digital technology, convinced that digital technology represents major innovation opportunities for the ecological transition. Planet Tech'Care is the first initiative bringing together a network of partners (professional organizations, schools, competitive clusters, associations, foundations and think tanks) to support companies that want to integrate digital technology into their environmental trajectory.

7.1.3 Human rights risks

In terms of respect for human rights, Tessi has identified risks related to non-discrimination and professional equality, respect for privacy, as well as risks related to working conditions and social dialogue.

In France; in order to maintain an open social dialogue, employee representatives are regularly informed and consulted on the company's strategic directions, the economic situation, social policy and working conditions. They are also invited to negotiate on a number of topics (skills management, professional equality, pay, etc.). In 2021, 64 new agreements were signed in France, concerning more than 72% of the workforce. They mainly concerned the following subjects: working hours, professional equality, management of jobs and career paths, risk prevention, etc.

At the end of 2021, 97.8% of Tessi group employees were represented by a Staff Representative Body (IRP).

7.1.4 Focus on diversity and professional equality[3]

[The measures described below apply to the Group scope, excluding ADM Value]

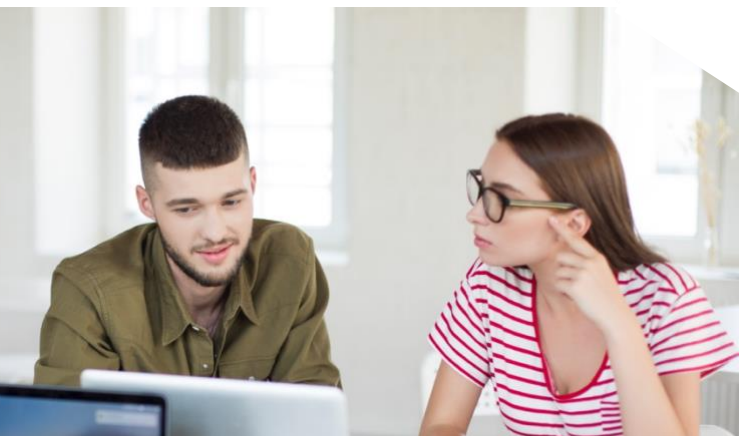
Promoting diversity is an essential component of the Group's HR Policy. Tessi thus encourages diversity of talent, equal opportunities and gender equality in the workplace.

The Group undertakes not to engage in any form of discrimination, whether social, ethnic, cultural or medical (except in the event of incapacity established by a doctor).

We provide all our recruitment managers with documentation and awareness materials detailing how to:

- Define the need and draft a job profile according to objective criteria
- Draft and publish an offer focusing solely on skills and favouring internal mobility
- Process applications by guaranteeing equality with regard to gender, origin, family status, disability, geographical situation, etc.
- Conduct recruitment interviews according to a structured and identical interview model for all
- Comply with personal data protection regulations in the context of recruitment

In addition, in 2020, the Tessi group created an e-learning module for its French teams entitled "Diversity and Combating Discrimination in Recruitment". This is mandatory for employees involved in a recruitment process.



[3] The actions described below provide a summary of the measures implemented by Tessi. For more information and operational examples, refer to the Tessi Non-Financial Information Statement.

7.1.5 Specific commitments

Since 2018, Tessi has signed the Diversity Charter alongside 3,800 other companies.

Convinced that responsible digital technology also requires ethical and inclusive digital technology, Tessi is also one of the 150 companies to have signed the NUMEUM Manifesto for the inclusion and retraining of women in digital professions.

Tessi undertakes to:

- Promote all types of career paths in recruitment processes
- Recruit profiles of all ages
- Support internal mobility by putting in place the resources and training needed to ensure successful individual internal development pathways

7.1.5.1 Gender equality

The proportion of women in the Tessi workforce amounts to:

- 44% on the Supervisory Board
- 40% on the Executive Committee
- 31% in senior management positions worldwide
- 38% of management staff

The majority of the Group's French subsidiaries have signed agreements on gender equality, including specific measures relating to:

- Effective pay: application of collective increases to employees on full-time parental leave
- Hiring: seeking a balance with comparable skills and qualifications
- Vocational training

7.1.5.2 The Group's Disability Policy

Tessi has adopted a proactive policy in favour of the professional integration and maintenance in employment of employees with disabilities. Its purpose is to:

- Valorize the Group's commitments
- Provide a common line of conduct for all entities
- Formalise the associated actions and objectives at Group level
- Achieve at least a regulatory employment rate for people with disabilities

This new policy will support the Group's existing commitments regarding non-discrimination and accessibility, as well as the measures already implemented such as:

- Raising employee awareness
- The organization since 2019 of a network of 20 disability advisers, who constitute the primary points of contact for employees and the company on these subjects
- A disability diagnosis conducted in France in 2021 by a specialized HR firm
- Disability support day: since January 2021, the Group has offered one additional day of paid leave per year to help its employees in their procedures for declaring themselves as workers with disabilities
- A partnership with the Association des Paralysés de France (APF): in 2021, this partnership generated €990,000 excl. VAT in turnover for APF

7.1.6 Focus on personal data management

In the context of GDPR compliance, the Group has developed governance dedicated to the protection of personal data, based on:

- A corporate team and a network of Data Privacy Officers in the subsidiaries
- A data protection policy (available in French, English, Spanish and German)
- Steering bodies responsible for monitoring the Group's compliance processes
- Specific indicators and a compliance risk management tool

Tessi has developed risk identification and management measures:

- Dedicated risk mapping for each subsidiary and consolidated at Group level
- "Privacy & Security by Design" analyses before the commissioning of any service or any new product or technological platform published by the Group
- Systematic compliance analyses of any new processing identified and monitoring of the action plan if necessary
- An annual audit plan and permanent controls by the compliance officers, monitored by the Group Compliance department
- A process for integrating and supporting new acquisitions

7.1.7 Health and safety risks

Ensuring the health and safety of employees and promoting quality of life at work is a priority of the Tessi Group HR Policy. In addition to the risks related to physical safety, Tessi has identified psycho-social risks related to the work-life balance.

7.1.8 Focus on the Group's physical safety platform[4]

Tessi has a comprehensive policy and procedure for managing health risks, protecting staff and securing premises and equipment. The entire system is implemented in our production centers as part of the quality, compliance and safety approach. The physical safety platform covers the following issues in particular:

- Securing the premises
- Health and personal protection
- Health & safety contacts
- Mandatory safety documentation
- Safety related to electrical risks
- Safety training
- Safety related to fire risks
- Machine maintenance

The criteria defined below apply to all production centers in France and are valid for all customers. All these criteria are subject to regular internal controls.

A single risk assessment document is produced and updated annually for each legal entity and each site. It aims to verify the existence of risks related to health and safety at work, their typology and potential severity, as well as to provide preventive measures and initiate action plans to remedy them.

7.1.9 Focus on the work-life balance

[the measures described below apply to the Group scope, excluding ADM Value]

Working from home has increased at Tessi since 2018, where the business allows it, in order to:

- Improve the working conditions of employees
- Reduce transport times and stress
- Contribute to optimizing travel times
- Reduce the environmental impact of commuting

Following the health crisis, Tessi rolled out a remote management training program for middle management. This aims to help them understand the specific nature of working from home, adjust managerial attitudes as necessary, implement operational and communication rules with their teams, etc.

The Group has also introduced a mandatory training module on the psycho-social risks.

Tessi has developed an e-learning module on the right to disconnect. In 2021, its completion rate was 93% for Tessi France (excluding Owliance, Certigna and TCM).

[4] The actions described below are a summary of the measures implemented by Tessi. For more information and operational examples, refer to the Tessi Non-Financial Information Statement.

7.2 Supplier risk management

Tessi is committed to ensuring that its suppliers and subcontractors comply with its own ethical and human rights commitments for all its global subsidiaries. The Group strives to define a responsible approach in its relations with its suppliers and subcontractors.

Regarding CSR performance, the level of compliance with the GDPR, the SAPIN II Act, the duty of vigilance and supplier information security levels, this results in particular in:

- The systematic sending of questionnaires integrating these CSR and Compliance requirements prior to the signing of any potential contract
- Supplier assessment and support
- Audits of its suppliers internally and externally (on-site and/or by questionnaire)

Some Tessi subsidiaries have defined an audit plan for the 2021-2023 period, organized into “campaigns” according to the type of supplier.

The health and safety risks associated with the activities of external companies working on Tessi sites are controlled by prevention plans, which must be completed prior to any intervention and which make it possible to identify the risks and show the measures put in place to prevent them.

7.3 Monitoring system and indicators

Compliance with the duty of vigilance is measured regularly as part of compliance processes and CSR reporting.

The indicators included in the Group's CSR roadmap and relevant to the duty of vigilance are:

- Ecovadis Note [2021 results: 56 / 2025 target: 73 (Platinum status)]

HR KPI:

- % of women on the Executive Committee [2021 results: 40% / 2025 targets: 40% minimum]
- % of women / total hires [2021 results: 64% / 2025 targets >= 50%]
- Frequency rate of workplace accidents [2021 results: 4.37 / 2025 average targets: 7.3 due to the increase in the Group's scope (taking into account the integration of new subsidiaries)]
- Inclusion of people with disabilities: 4.6% of the workforce in France in 2021 / 2025 objectives: 6%

Personal data KPI:

- % of Tessi hosting sites ISO 27001 certified [2021 results: 100%]
- % of personal data breach notifications processed and notified on time [2021 results: 100%]
- GDPR awareness rate (mandatory for all employees): 92%

Environment KPI:

- Proportion of "target" teams trained in responsible digital technology issues) [2021 results: 70% / 2025 targets: 100%]
- GHG emissions (Scope 1, 2 and 3) [2021 results: 12,386 Te CO_2] / 2025-2030 targets will be redefined in 2023
- Change in the ratio of electricity consumed to global workforce [2021 results: -23% / N-1]
- Monitoring of GHG emissions due to employee travel (commuting & business travel) [2021 results: change -17% / 2025 targets: -5%]
- Share of workforce covered by a recycling channel [2021 results: 90% (excluding ADM Value) / 2025 objectives: 100%]
- % of new Tessi digital solutions incorporating sustainability criteria into the design [2021 results: 25% / objectives: 100%]
- Greening up of the vehicle fleet: share of hybrid vehicles (HV) and electric vehicles (EV) in the company car fleet: 9% in 2021 / 2025 objectives: 20%
- Share of renewable energy in the Group's electricity consumption: 100% by 2025

Anti-corruption KPIs

- Deployment rate of the code of ethics at subsidiary level [2021 results: 90% / 2025 target: 100%);
- Awareness rate (mandatory module) for all Group employees = 70%
- Number of exposed persons trained = 258 persons
- Whistleblowing system KPI: 2 alerts in 2022