

tessi

HUMAN RIGHTS POLICY



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Introduction

The Tessi Group, a **signatory of the United Nations Global Compact** since 2011, is purposefully committed to respecting the laws and regulations in force in each country in which it operates and to promoting human rights in all its business activities.

This **human rights policy** illustrates the Group's commitment to human rights throughout the value chain. Its purpose is to set out a reference framework of rigorous procedures to ensure **respectful and ethical practices and behaviour** amongst all our staff and in all the geographical areas in which our Group creates value.

It complements the principles already set out in our **SNFP** (Statement of Non-Financial Performance), our **Code of Ethics** and our **Vigilance Plan**, all of which were developed in line with:

- the Universal Declaration of Human Rights,
- the United Nations Guiding Principles on Business and Human Rights,
- the fundamental conventions of the International Labour Organization (ILO),
- the United Nations Convention on the Rights of the Child,
- the administrative, social, and fiscal obligations provided for by French legislation or those of the country in which the Group is operating,
- the OECD Guidelines for Multinational Enterprises,
- the 10 principles of the United Nations Global Compact, of which Tessi is a signatory.

Finally, this human rights policy reflects our determination to act ethically and responsibly in order to **protect the rights of our employees, partners and all stakeholders involved in our business activities**. Human rights are one of the key focus areas taken into account in our CSR roadmap and on an ongoing basis in all policies applicable within the Tessi Group. More generally, it also aligns with the Group's strategic vision.

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**HUMAN
RIGHTS
POLICY**

1. Purpose and scope

1.1 SCOPE OF APPLICATION

The Tessi Group has a responsibility to implement the necessary measures to ensure that **human rights are respected throughout its value chain**.

This policy thus applies to all the Group's business activities (and therefore all its subsidiaries) throughout the world, and to all its stakeholders: employees, partners with whom it has an established commercial relationship, suppliers and subcontractors.

Each business manager is responsible for ensuring that the principles of this policy are fully respected.

Tessi imposes these principles in its contractual relations with its partners, suppliers and subcontractors, and incorporates them into all applicable procedures, policies and roadmaps.

1.2 DISTRIBUTION AND COMMUNICATION

This human rights policy is made available to all Group employees via our internal communication tools. It is translated into English, French, German, Portuguese and Spanish and is supported by training and awareness-raising initiatives.

Tessi undertakes to **distribute and promote this policy to its employees and, more generally, to all its stakeholders**. The policy is also published on the Group's corporate website.

1.3 METHODOLOGY FOR IDENTIFYING AND RATING RISKS

Every year, Tessi assesses the risks of serious violations of human rights and fundamental freedoms in relation to its business activities and those of its suppliers, in accordance with France's corporate duty of vigilance law.

The process of identifying and ranking Tessi's main human rights risks is based on its duty of vigilance mapping, which is **updated regularly - at least once a year - to reflect changes in the Group's business**. The risk assessment process follows the steps outlined below, which guarantee that it is implemented robustly:

- identifying, assessing, ranking and managing compliance/security risks,
- identifying risk events,
- listing the risk factors that might increase the probability of a risk event occurring,
- assessing the probability and impact of each of these risk factors without taking the risk management measures already in place into account ('gross criticality'),
- assessing gross risk ('gross criticality'),
- defining the priorities for implementing risk management resources,
- assessing the residual risk ('residual/net criticality'), taking risk management measures into account,
- informing senior management and giving it the visibility it needs to implement risk reduction measures that are proportionate to the issues identified during mapping.

Materiality analyses are carried out on a regular basis, enabling the Group to constantly assess the social and environmental challenges it faces.

As a result, the risk management systems identified during mapping are presented in the Vigilance Plan and enable us to target the risks we need to prevent and associated mitigation plans.

Framework documents for the procedure: SMC-PR-01 Compliance - Security Risk Management Procedure V 1.4

2. COMMITMENTS

MESSAGE FROM THE CHAIRMAN

At Tessi, we firmly believe that human rights are at the heart of our mission and values. Our human rights policy reflects our unwavering commitment to dignity, fairness and wellbeing for every individual.

Our policy is based on three fundamental focus areas:

1. **Respect for human rights:** We are committed to respecting and promoting human rights in all of our business activities and relations. This includes combating all forms of discrimination, harassment and exploitation.
2. **Developing human capital:** We recognise that our staff are our most valuable asset. That's why we take human capital into account upstream in our management processes, to prevent risks and ensure a healthy and fulfilling working environment.
3. **A relationship based on trust:** We know that trust is essential for sustainable performance. We strive to maintain transparent and respectful relationships with our employees, customers and partners, ensuring that everyone feels valued and heard.

Together, we are building a future where respect for human rights, the development of human capital and relationships based on trust are the foundations of our sustainable success.

Alain de Lambilly
CEO



Tessi is committed to implementing all necessary measures to limit **the six risks related to human rights:**

- risks related to compliance with local law and international standards throughout the value chain,
- risks related to compliance with anti-discrimination and diversity regulations,
- risks related to compliance with working conditions,
- risks related to respect for individual freedoms,
- risks related to the protection of personal data and privacy,
- risks related to the protection of whistleblowers.

Six commitments have thus been formalised to address these risks.



**HUMAN
RIGHTS
POLICY**



2.1 COMPLYING WITH THE LAW

Tessi is committed to respecting international rights, affirming its role as a responsible global company.

It should be noted that Tessi complies with the national legislation and regulations in place in each of the markets in which it operates. Where the Group is faced with conflicts between internationally recognised human rights and local legislation, Tessi and its entities apply **the most virtuous legislation in terms of respect for human rights**.

Tessi also undertakes to avoid infringing on the rights of local communities when it sets up operations in a new geographical zone.

We adhere to the universal principles governing human rights, labour, the environment and anti-corruption practices, as set out in the United Nations Global Compact. By **integrating these standards into our corporate strategy**, Tessi ensures that its business practices, employee relations and interactions with communities are conducted with integrity and respect for fundamental rights. This commitment is reflected in our **rigorous internal policies, dedicated training and constant vigilance** to prevent any violation of international rights.

For the Group, this commitment means **zero tolerance** of:

- child labour,
- forced labour,
- any work likely to endanger the physical, mental or moral wellbeing of our staff,
- all forms of modern slavery and human trafficking,
- all forms of violence and inhuman, cruel or degrading treatment.

2.2 NON-DISCRIMINATION AND EQUAL OPPORTUNITIES

The Tessi Group is committed to respecting the provisions of the ILO conventions on non-discrimination and equal opportunities.

This commitment requires the Group to:

- **Prohibit all forms of discrimination.** As such, the Group does not exclude any individuals from its recruitment procedures and, in particular, prohibits any distinction, exclusion or preference based on race, colour, sex, age, religion, political opinion, national origin, social origin, disability, family situation, sexual orientation or gender identity.
- **Support equal opportunities for all employees and job applicants.** This means that Tessi guarantees equal pay for men and women who do identical jobs and have the same qualifications, training, professional experience, seniority and skills required for the position.
- **Promote diversity and inclusion.** Tessi strives to create a working environment in which everyone can flourish and succeed, regardless of their personal identity or characteristics. By fostering an inclusive workplace, Tessi endeavours to leverage the diversity of its talent to build a stronger, more cohesive organisation, where every voice is heard and every contribution is valued.

2.3 DECENT WORKING CONDITIONS AND FAIR PAY

At Tessi, we are committed to providing a working environment in which every employee can carry out their duties safely and without risk to their health. **We aim to guarantee the highest standards of safety wherever we operate.**

This commitment requires the Group to:

- **Guarantee a healthy, safe and dignified working environment and conditions** for its own staff. Tessi scrupulously complies with all occupational health and safety regulations.
- **Foster a culture of prevention.** This commitment is reflected in constant investment in protective equipment, regular safety audits and transparent communication on health and safety policies.



- **Ensure the wellbeing of its employees** by striving to go beyond legal requirements in terms of quality of life at work.
- **Apply a zero tolerance approach when it comes to moral and sexual harassment** amongst all its staff (including sexual and gender-based violence and abuse).
- **Reject all forms of violence.**

In order to guarantee fair pay, the Group strictly adheres to the laws and regulations in force concerning staff remuneration and ensures that it maintains a fair and transparent pay policy based on merit and performance. As such, the Group is committed to eliminating unjustified pay gaps.

2.4 RESPECTING INDIVIDUAL FREEDOMS

Under international human rights standards, everyone has the right to freedom of opinion and expression. The right to freedom of opinion ensures that no one is discriminated against on the grounds of their beliefs. **Collective bargaining is essential to social dialogue and enables employees and employers to determine working conditions, such as pay and working hours, together.** It is supplemented by freedom of association, which authorises employees to form trade unions to defend their interests. In accordance with the principles of the Group's Code of Conduct, Tessi is committed to respecting these individual freedoms throughout its value chain.

This commitment requires the Group to:

- **Respect freedom of expression.** More widely, Tessi is committed to respecting the individual freedoms of its employees as long as they are compatible with the professional relationship between the two parties.

- **Respect freedom of association and the right to collective bargaining.** The Group recognises that employees are entitled to join trade unions to defend their interests.
- **Maintain open social dialogue.** Tessi undertakes to comply with current legislation concerning the management of working hours, pay, professional training, trade union rights and occupational health and safety.
- **Adopt a zero tolerance approach** to all forms of intimidation, harassment, sanction or discrimination against an employee on the grounds of his/her trade union activities.

2.5 PROTECTING PERSONAL DATA AND PRIVACY

As part of its compliance with the various regulations related to personal data protection (including the GDPR), the **Group has developed a governance structure dedicated to the protection of personal data.** In this respect, Tessi is committed to scrupulously respecting the national laws in force in each country in which it operates. Such compliance is essential to securing the digital confidence of its customers and to supporting the digital transformation. The Group is also committed to respecting the privacy of its employees.

This commitment requires the Group to:

- **Oppose any form of invasion of privacy.** As such, the Group is committed to helping its employees achieve an optimal work-life balance.
- **Protect all the personal data of its employees, customers, suppliers** and any other business partners or individuals with whom it works.

2.6 PROTECTING WHISTLEBLOWERS

The Tessi Group undertakes to comply with the requirements of French Law no. 2016-1691 of 9 December 2016 related to transparency, the fight against corruption and the modernisation of economic life (Sapin 2) and, in particular, the specific provisions outlined for whistleblowers.

Internal whistleblowing procedure: SMC-PR-03-Internal Whistleblowing Procedure-System.

3. Implementing and steering the policy

3.1 GOVERNANCE

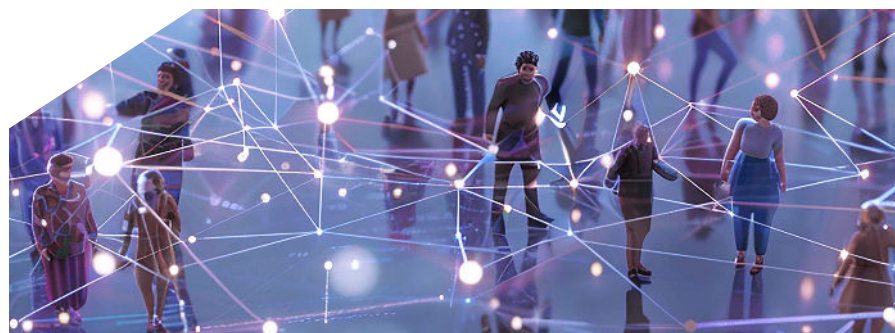
The commitments described above generate tangible action within the company, such as training, awareness-raising initiatives, fair recruitment processes and projects that promote human rights at all levels of the organisation.

The implementation of this policy can be measured by indicators already included in our 2023 SNFP.

The Tessi Group Ethics Committee is responsible for this human rights policy. Their supervisory role involves steering the policy and ensuring that it is correctly implemented at all levels of the organisation, both internally and externally. The Ethics Committee is made up of the following members:

- The Legal Director
- The Compliance Director
- The Compliance Officer
- The Internal Audit Director
- The Group HR Director
- The Group CSR Director

Its operational implementation is overseen by all divisions throughout the Group to ensure that human rights are integrated into our day-to-day operations and to guarantee compliance with international and local human rights standards, as described in this document.



3.2 PROGRESS PLAN

The Group is committed to continuous improvement. Tessi undertakes to implement improvement actions designed to consolidate its human rights policy

and to monitor and update this policy as necessary in light of new challenges, risk analysis results and regulations.

3.3 TRAINING AND RAISING AWARENESS

Respect for human rights is a fundamental requirement that applies to the entire scope of the Group's business activities. There are no circumstances that would justify non-compliance with this policy. Involving our staff in the implementation of this policy is essential to the Group's success because the responsibility for continuously improving working conditions and respecting fundamental rights lies with all our employees.

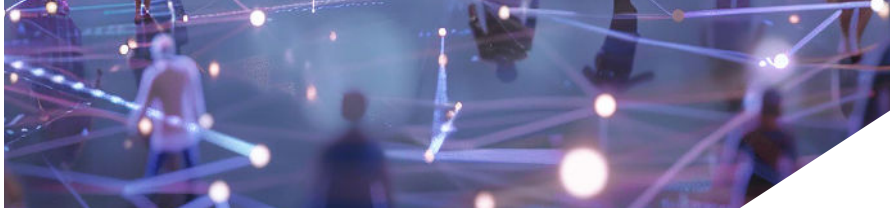
To achieve this, **awareness-raising initiatives and training programmes on these principles are provided regularly**, particularly in the context of compliance with France's corporate duty of vigilance law.

These schemes are based on four complementary focus areas:

1. e-learning courses for all staff,
2. targeted training for certain categories of staff (e.g. training for those who are most at risk of corruption, or how to guarantee privacy by design/default, or training for project managers or developers in the context of the GDPR),
3. targeted training reminders,
4. awareness-raising initiatives at various compliance, HR and CSR steering meetings, as well as on an ad hoc basis.

Depending on the nature of the training, it can take one of the following forms:

- e-learning modules,
- awareness-raising/face-to-face training,
- email communications,
- reminders of good practices in the form of practical information sheets or newsletters.



Other specific training courses will be implemented over the coming years to cover the full range of human rights issues.

3.4 WHISTLEBLOWING SYSTEMS

The Tessi Group has set up an internal whistleblowing system that enables any of its stakeholders, including employees - regardless of whether they are internal, external or occasional (permanent, on a fixed-term contract, apprentices, trainees, temporary subcontractors, suppliers, etc.) - to:

- seek advice on ethics,
- report behaviour or situations that contravene the Code of Ethics, such as:
 - » failure to comply with laws, regulations or the public interest,
 - » attacks on human rights and fundamental freedoms,
 - » harassment or discrimination,
 - » failure to comply with health, hygiene and safety rules in the workplace,
 - » environmental damage,
 - » corruption, influence peddling or fraud.

Tessi provides an online reporting platform in English, French, German and Spanish.

Its use is optional. This platform enables us to:

- secure the process for collecting and handling ethical alerts,
- give employees confidence in the system in place,
- provide members of the Ethics Committee with a reliable and efficient collaborative tool.

3.5 EFFICIENCY ASSESSMENT/OTHER KPIS

1. **Compliance with the law:**
 - » Number of human rights training courses organised per year.
 - » Percentage of employees trained in human rights.
2. **Non-discrimination and equal opportunities:**
 - » Diversity indicator (breakdown by gender, age, origin, etc.).
 - » Number of discrimination complaints received and processed.
3. **Decent working conditions and fair pay:**
 - » Accident rates.
 - » Percentage of employees satisfied with their working conditions.
4. **Respecting individual freedoms:**
 - » Number of collective bargaining meetings held.
 - » Employee trade union participation rate.
5. **Protection of personal data and privacy:**
 - » Number of personal data breach incidents.
 - » Percentage of employees trained in data protection.
6. **Protecting whistleblowers:**
 - » Number of reports received via the internal whistleblowing system.
 - » Average time taken to process reports.



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