

04

impact report

Introduction	98		
1. Our approach	98		
1.1. CSR issues and mission	98		
1.2. Commitments to SDGs (Sustainable Development Goals)	100		
1.3. Group CSR policy: 1 mission, 4 pillars	101		
2. Commitments, awards and notable achievements [MR]	103		
2.1. Commitments	103		
2.2. Awards	104		
2.3. Notable achievements	104		
3. Standards and certifications [MR]	106		
4. Environmental issues and impact offers [MR]	107		
5. Social initiatives in France [MR]	112		
Patronage of the Démos project of the Paris Philharmonic Orchestra	112		
Econocom, partner of Double Horizon	112		
Econocom, partner of the Espérance Banlieues association	112		
Econocom, partner of 100,000 entrepreneurs	113		
		Econocom, partner of the Maison de l'Amitié association	113
		Econocom, A partner of the ZUPdeCO association	113
		Econocom, A partner of the Konexio association	114
		Patronage of Station Debout	114
		6. Societal and environmental commitments on an international scale [MR]	115
		Econocom Belux	115
		Econocom Italy	116
		Econocom Netherlands	116
		Econocom UK	117
		Econocom Germany	117
		Econocom Spain	118
		7. Cybersecurity	119
		Context and policies	119
		8. Protection of personal data	120
		Data protection: background and policies	120

Introduction

CHANGE IN THE PREPARATION AND PRESENTATION OF THE IMPACT AND SUSTAINABILITY REPORTS

In 2024, Econocom decided to publish its impact report separately from its sustainability report (CSRD):

- on the one hand, to show the Group's willingness to share its CSR commitments and actions with all its stakeholders;
- on the other hand, to meet the sustainability standards required by the new **Corporate Sustainability Reporting Directive** (CSRD).

Thus, there has been a transition from the former **extra-financial performance declaration** (EFPD) to the **Corporate Sustainability Reporting Directive** (CSRD) in the abovementioned sustainability report.

1. Our approach

1.1. CSR issues and mission

Useful digital technology at the core of our CSR approach

Econocom designs and develops digital technology that is really useful for the end user. We are convinced that useful digital technology, as part of the circular economy, is essential for both combatting digital waste, and contributing to the performance and competitiveness of companies.

Since its inception more than 50 years ago, the Econocom group has been a pioneer in creating solutions to support the digital transformation of companies and public bodies. We have now added a social responsibility dimension to the group's DNA: promoting a responsible and circular digital approach to create a positive impact.

As part of this approach, we are involved in a number of charity initiatives, in particular to combat the digital divide, and are committed to recycling or reusing

equipment in partnership with organisations in the social and solidarity-based economy. Lastly, the Group strives to optimise the energy efficiency of its digital infrastructures.

CSR at the service of innovation and our customers

Corporate Social Responsibility (CSR) is now seen as an indispensable component of business activities and as an opportunity. We have therefore decided to use it as a source of innovation and competitive advantage, for us and for our customers.

Thus, in our organisation, employees go beyond mere compliance with the law and regulations, designing innovative offers that address CSR issues to better meet customer needs. We co-construct our offers while remaining independent (from hardware manufacturers, service companies, cloud providers and financial institutions), leveraging the entire ecosystem to create bespoke solutions with high added value for the customer.

This freedom of action allows us to create better synergies with our most responsible partners.

Because we believe the best way to initiate change is to exemplify it, everything we do is based on a responsible approach.

Promoting responsible digital to bring about social transformation

As Europe's leading General Digital Company, it is our duty to spearhead change. And because accelerating means anticipating, Econocom is a pioneer in the digital circular economy and aims to consolidate its leadership.

The group is dedicating all its expertise to provide sustainable answers to these fundamental challenges:

- **contributing to the ecological transition through digital technology while reducing its carbon footprint;**
- **promoting changes in society and ensuring inclusion and data security.**

Balanced governance and diversity

Since its foundation by entrepreneur Jean-Louis Bouchard, the group has stood out for its spirit of conquest and its agility.

Econocom encourages employees to develop entrepreneurial projects, which has resulted in the creation of a number of successful offerings.

Furthermore, Jean-Louis Bouchard relies on a balanced governance structure, which reflects the group's entrepreneurial spirit and diversity:

- **a Executive Committee of 6 people from France and overseas, each in charge of a country or business line; and**

- **a Board of Directors of 11 people, including 4 women and 4 independent Directors. The members all come from an entrepreneurial background.**

Environmental, labour and social issues

Digital pollution generated by the internet seems invisible; and yet every email, every online search, every video uses energy and generates greenhouse gas emissions. Various studies have evaluated the carbon footprint of digital technology on a global scale, placing it between 2% and 4.3% of total CO emissions and between 5 and 10% of total electricity consumption. ⁽¹⁾

The Group is also committed to effecting positive change in society by:

- **promoting diversity of skills;**
- **focusing on solidarity and inclusion;**
- **reinforcing its ethics;**
- **promoting a committed HR policy.**

Continuous improvement

In 2024, the group strengthened most of its flagship initiatives and launched new ones, both in France and internationally. The CSRD (Corporate Sustainability Directive) enabled us to promote our action plans and commitments across our organisation in order to address new regulatory requirements.

We also ensure that all our offers are useful: our investment strategy is above all responsible and mindful of our impact.

(1) varies according to sources

1.2. Commitments to SDGs (Sustainable Development Goals)

Since 2019, we have been measuring our progress and will continue to do so because we take our responsibility in these areas very seriously. Econocom recognises the urgent need for private and public sector players to work together to achieve the 17 Sustainable Development Goals (SDGs) identified by the United Nations. As part of this commitment, an internal working group was set up to select the most important SDGs for Econocom.

This selection was made after consulting

several of our internal stakeholders: HR, Purchasing, Sales and Marketing and Legal, enabling us to study and prioritise our Sustainable Development Goals. **Three categories of goals** were identified:

- **priority commitments;**
- **active contribution;**
- **participation.**

We have therefore incorporated 10 goals into our CSR policy.

Five are priorities for Econocom: responsible consumption and production, climate action, quality education, reduced inequalities and partnerships for the goals.



The 2030 Agenda is structured around the “5Ps”, as it focuses on the Planet, Populations, Prosperity, Peace and Partnerships.

To that end, we have set out below our priority commitments in terms of three of the 5Ps - “Population/Planet/Partnerships”:

Population

- SDG 4: Quality Education: Econocom is committed to digital technology in

schools in order to combat the digital divide and promote digital accessibility.

- SDG 10: Reduced inequalities: Econocom has always favoured recruitment and development based on the skills of each individual and is against any form of discrimination. For a number of years, the Group has embarked on a proactive approach to promote gender equality in the workplace, gender balance and diversity.

Planet

- SDG 12: Responsible consumption and production: Econocom measures and reduces the impact of its digital consumption.
- SDG 13: Measures to combat climate change: Econocom is firmly committed to decarbonising its activities and combating climate change.

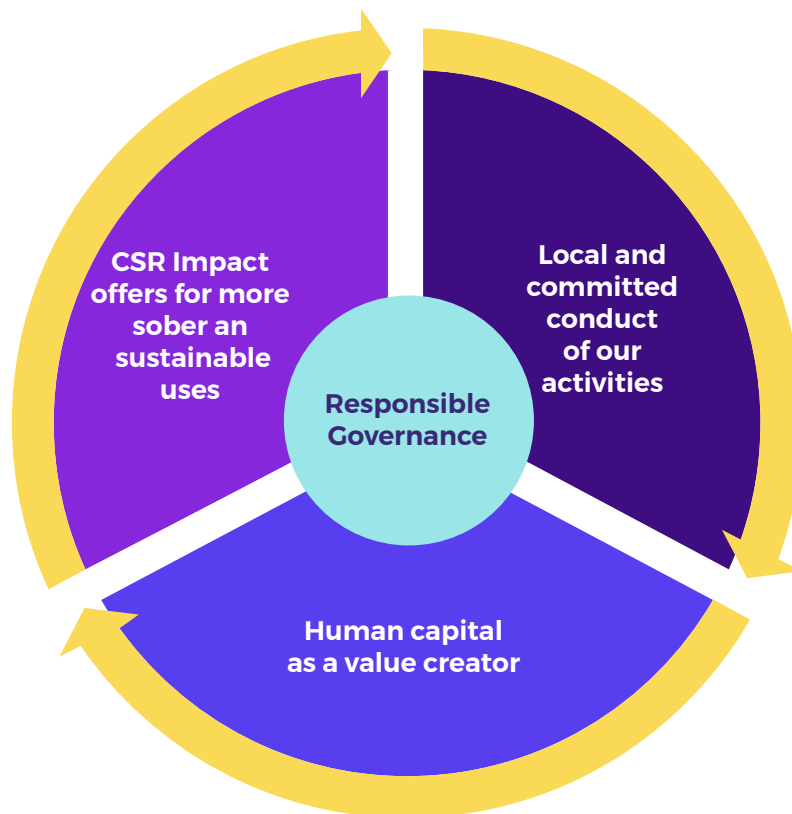
Partnerships

- SDG 17: Partnerships for achieving the objectives: The Econocom Group's commitments are disclosed to all its stakeholders and it has built partnerships in the private sector and civil society.

1.3. Group CSR policy: 1 mission, 4 pillars

The Econocom Group has defined its four CSR pillars, as well as its mission, with all its stakeholders.

Promoting a responsible, circular digital approach to generate a positive impact



CSR Impact offers for more sensible, sustainable use

- Decarbonisation of products and services.
- Transition to a circular economy.
- Cybersecurity and data protection.

Committed and local conduct of our activities

- Leading the way in Green IT and the circular economy.
- Responsible management of the business's carbon footprint (buildings, cars, logistics).
- CSR partnerships.
- Responsible purchasing and supply chain resilience.
- Strong local presence.
- Providing jobs for the local community.
- Philanthropic initiatives (education and responsible digital technology).

Human capital that creates value

- Developing new approaches to work.
- Health, well-being and quality of life in the workplace.
- Industrial relations and employee engagement.
- Inclusion and diversity.

Responsible governance

- Incorporating CSR into the company's strategy.
- Responsible governance.
- Corporate culture.

The ambitious and challenging programme includes all the main issues identified in the assessment by internal and external Group stakeholders and highlights the areas which Econocom would like to focus on over the coming years.

The Econocom Group's objectives are detailed in the sustainability report.

2. Commitments, awards and notable achievements

2.1. Commitments

- Since 2012, the Econocom Group has been a member of the United Nations Global Compact: as such, Econocom is committed to respecting and promoting the ten principles of the Global Compact. These principles concern: Human Rights, labour law, the environment and the fight against corruption.



- Econocom is a signatory of the Charter of the Institut du Numérique Responsable, thereby reaffirming our commitment to maintain a resolutely responsible digital approach by joining forces with companies and organisations to apply and promote industry best practices.



- Validation of the SBTi commitment ⁽¹⁾ is a crucial milestone in the group's ambitious plan to reduce carbon emissions and encourage its stakeholders to follow suit.

After signing the SBTi commitment letter at the end of 2023, Econocom announced the validation of its science-based targets for reducing its emissions in the short term, marking a key step in its corporate social responsibility strategy. This commitment, aligned with the objectives of the Paris Agreement, reflects Econocom's commitment to actively contributing to the fight against climate change.

Econocom has pledged to reduce its absolute Scope 1 and 2 greenhouse gas (GHG) emissions by 61.4% by 2028 compared to 2018. This ambitious plan includes a commitment to increase the proportion of renewable electricity from 5% in 2018 to 92% by 2028. In addition, Econocom plans to ensure that 100% of its suppliers of goods and services have targets validated by SBTi by 2028.

Transparency and accountability are key to Econocom's approach, involving rigorous processes to monitor and report on progress, thus ensuring compliance with SBTi standards. To address this overall challenge, the group is working closely with its partners and suppliers to encourage them to adopt practices aligned with its climate goals.



(1) SBTi: Science-based target initiative.

2.2. Awards

- EcoVadis awarded Econocom the Gold medal for its CSR performance with a score of **74/100 for 2024**, an increase of 4 points compared to our previous assessment.

Considerable efforts were made during the 2018-2024 period, which allowed the group to gain 16 points.

Econocom has taken into account EcoVadis' recommendations by developing or strengthening in particular:

- Policies with respect to the environment, social responsibility, human rights, ethics and responsible purchasing as well as CSR memberships (SBTi, United Nations Global Compact);
- environmental and social certifications in the field of ethics and responsible purchasing (ISO 14001, ISO 27001);
- all measures relating to energy consumption, greenhouse gases and waste management, working conditions, employee health and safety, diversity, equity and inclusion, to name a few.

Econocom has set itself a new goal: to become one of the top 1% of companies with Platinum certification by 2028.



- In 2024, Econocom obtained a place in the Financial Times Diversity Leaders ranking. We were ranked 753rd out of 850 companies in Europe, in recognition of our commitment to inclusion and diversity.



- In 2023, Econocom Factory received an environmental award which symbolises commitments to the environment, in particular its digital devices refurbishment division.
- SMAAART.fr (Econocom Factory website) was recognised as the No. 1 e-commerce site in the refurbished products category of Capital magazine's ranking of the best sites in 2023 (Statista survey carried out on 10,000 retail sites selected according to their audience and activity).
- In 2024, Econocom Factory came first in the UFC Que Choisir ranking of refurbished smartphone sellers.

2.3. Notable achievements

- In April 2024, the Econocom group reached a milestone in its CSR approach with the launch of "Impact", a digital media that promotes our plans and commitments in terms of corporate social responsibility. Informative and educational, this website is a testament to the group's commitment to measuring, continuously and in a tangible way, the impact of its actions, to ensure a responsible digital approach, working hand-in-hand with its ecosystem.

Online since April 2024:
www.econocom.com/impact



- Econocom attended the Pro durable trade fair in October 2024 to co-host with PAC (Pierre Audoin Consultants) a workshop on the theme of “Trends in CSR strategies and expectations of digital technology.”



The aim of this workshop was share the data and information from the study with attendees. The following four areas were selected by the Econocom group:

- a stronger focus on sustainable development in the company strategies;
- promoting responsible digital technology to companies, for both applications and IT equipment;
- understanding organisations’ carbon footprint, from tools to measurement;
- the level of adoption of reconditioned equipment.

To that end, Econocom has developed its EASI offer, a solution that fulfils technological needs, while acting responsibly to reduce the carbon footprint of digital technology.

3. Standards and certifications

- We systematically apply ISO 26000 to ensure the integrity of our societal action.
- Similarly, for seven years, our service solutions have been compliant with ISO/IEC27001, one of the world's most renowned standards for guaranteeing information security.
- ISO 9001 and ISO/CEI 27001 certifications are managed locally in France, Morocco, Benelux, Spain and Italy.
- ISO 14001 certifications are also managed locally in France and in Belgium.
- For the 4th year in a row, Econocom Belux took part in the VOKA initiative, the Flemish corporate network that supports and recognises our commitment to sustainable development. Each year, the local sustainable development strategy is defined on the basis of a 10-point action plan.
- Our **Product Care** service centre received **the QualiRepar label**. Product Care is the after-sales service for mobility, in charge of maintaining, repairing and extending the useful life of mobile devices (phones, tablets and laptops). The aim is to increase the number of devices using the ProductCare offer from 0.9 million to 1.5 million by 2028.
- Our Econocom Factory refurbishing activity, with the SMAAART brand, also received this label, as well as the **QualiCert certification**, which is a testament to the quality of the services provided. In addition, this activity received the RecQ label, the leading European quality label for used products.



This plan requires a minimum of 10 actions to be carried out concerning four of the five "P"s of the Sustainable Development Goals (SDGs) (Peace, People, Prosperity, Planet, Partnerships).

We are particularly proud to have been awarded the Sustainable Entrepreneurship Charter for the third consecutive year and have also acquired the status of "SDG Pioneer". This is a testament to the efforts of Econocom Belux employees.



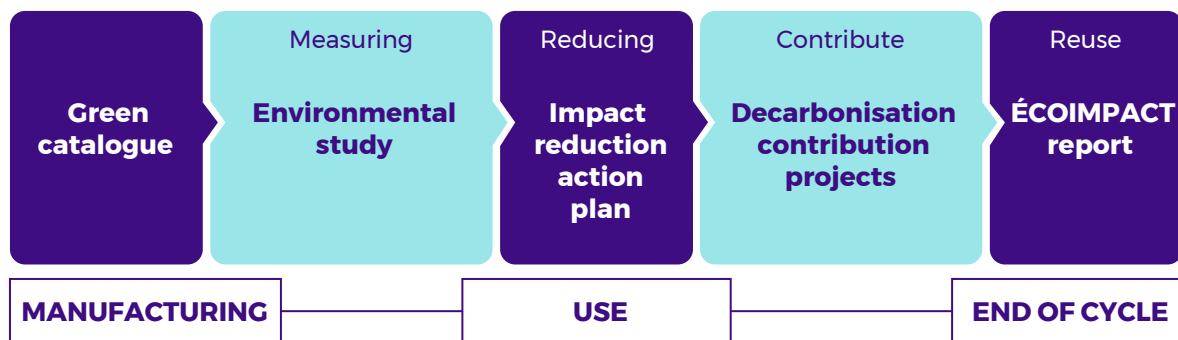
4. Environmental issues and impact offers

Econocom has created a range of impact ⁽¹⁾ offers for its customers, including :

EcoCarbon

To meet the growing challenges of reducing the carbon footprint of digital

technology, Econocom has devised the EcoCarbon offer. Based on several years of expertise in Green IT, this end-to-end solution consists of a number of components designed to reduce the impact of its IT equipment:



EPOS Services

- Econocom offers e POS Services, a customised solution to support all the components of in-store or drive-through checkout lines.
- This comprehensive equipment support contract covers workshop repair and on-site customer service.
- 98% of equipment is repaired and returned to service, thereby increasing its lifespan.

EASI

EASI, an acronym for “Econocom as a Service for Impact”, is an innovative “Device as a Service” solution from Econocom that combines:

- **operational efficiency:** optimised management of IT environments;

- **economic optimisation:** reduction of total costs of ownership (TCO);
- **social and environmental responsibility:** reduction of the carbon footprint and support for the circular economy; and creation of solidarity jobs in our mission-driven company.

To address the challenges of decarbonising the digital industry, which contributes significantly to global greenhouse gas (GHG) emissions, the EASI offer is a practical, sustainable solution. Focused on the user experience, it includes technological and organisational services that save resources while improving companies' environmental performance.

(1) Incomes from impact-based offers will represent 507 million in 2024, or 18.5% of Group consolidated revenue.

The service components of the EASI offer:

Ecoswitch

RESPONSIBLE MANAGEMENT OF IT ASSETS

EcoSwitch is a strategic service that streamlines the management of IT assets, including:

- Purchase and/or Sale & Leaseback of old IT equipment to be reconditioned or provided to employees;
- Asset lifecycle management and streamlining and harmonising assets;
- Optimising the useful life of equipment to suit each customer's need.

By adopting a circular approach, EcoSwitch helps reduce waste due to obsolescence while maximising economic and environmental benefits. This service is a crucial driver for transforming IT use habits and promoting sustainable resource management.

PROVISION AND PREPARATION OF DEVICES

EASI provides new or refurbished workplace equipment for a monthly fee. The devices are prepared according to customers' needs:

- Installation of protections and technical configurations;
- Tailored integration to ensure optimal performance.

Product Care

A PREMIUM MAINTENANCE SERVICE

Located in France, Product Care offers comprehensive support for mobile devices (computers, phones, tablets) through a high-performance service centre. Services include:

- **a one-stop shop** for after-sales service requests;
- **extended warranty** up to seven years;
- **insurance cover** (theft, accidents, material damage);
- **repair with original parts** and accreditations from major manufacturers (Apple, Lenovo, HP, etc.);
- **quick replacement of** defective equipment (next day or same day);
- **user support** and statistical analyses to optimise SLAs.

These services extend the life of equipment, reduce obsolescence and promote environmentally responsible use of resources.

RECONDITIONING AND END OF USE

Econocom Factory, a specialist subsidiary located in St-Mathieu-de-Trévières, plays a key role in the EASI offering thanks to its reconditioning expertise. Since 1986, the company has been committed to extending the lifespan of electronic equipment while supporting local, responsible production. Econocom Factory offers:

- **quality reconditioning:** compliance with strict protocols guaranteeing the reliability and transparency of processes;
- **environmental and social commitment:** a responsible employer with certifications such as "Service France Garanti" and ISO 14001;
- **short-circuit production:** significantly reducing the carbon footprint.

In 2017, Econocom Factory created the SMAAART brand for reconditioning digital equipment for the B2C market.

With the aim of tripling the volume of reconditioned and recycled assets from nearly 500,000 to 1.5 million by 2028, Econocom Factory is an essential element of Econocom's circular economy approach and has diversified to address the professional market in order to decarbonise the digital technology of our key customers and thus improve their CSR footprint.

Ecoimpact

A COMPLETE CSR ASSESSMENT

EcoImpact is an assessment tool that quantifies the environmental and societal impact of the EASI offer, allowing companies to:

- reduce their carbon footprint;
- provide jobs for the local community through reconditioning and recycling activities;
- formally set out the environmental and societal benefits in a clear and concise report.

A holistic approach for a sustainable future:

Econocom's EASI offering provides an essential solution to the environmental and economic challenges of the digital sector. By offering comprehensive and innovative solutions, Econocom actively contributes to the decarbonisation of digital technology while supporting the circular economy. This approach is fully in line with the group's CSR commitments and is a major opportunity for companies wishing to combine performance and sustainability.

Green energy

Investment in the Green & Energy business unit illustrates Econocom's ambition: "to be the leading partner to support our customers in their energy and digital transformation projects."

Green & Energy's offerings enable its clients to remain competitive and sustainable.

The energy transition law, the tertiary sector decree, the F-Gas regulation, RE 2020, the plan to decarbonise industry, energy saving certificates: we help our customers understand all the regulations and legislation designed to promote energy and environmental performance.

The structural increase in energy prices has an impact on the competitiveness of organisations. To control its purchasing costs over the long term, the company must implement energy efficiency initiatives and shift towards renewable energies.

Through its Green & Energy Department, Econocom addresses these challenges by providing a comprehensive solution, ranging from identifying sources of energy savings to implementing, overseeing and financing green projects.

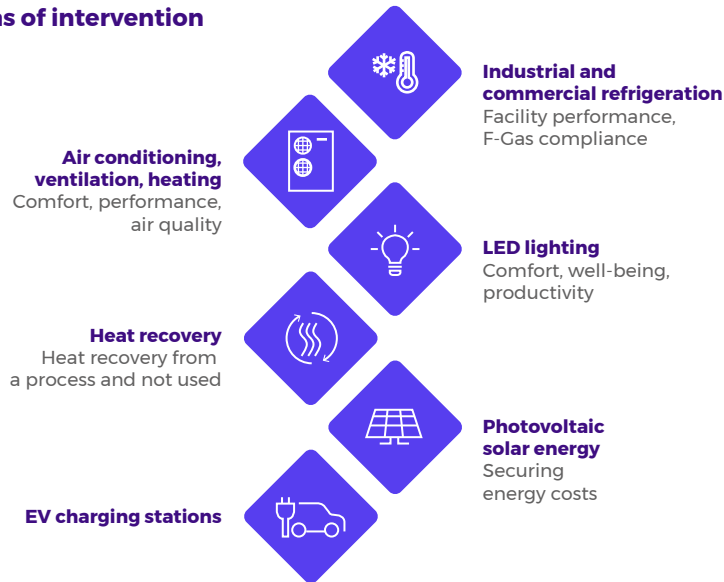
What we do :

- **design:** we identify sources of energy savings, independently recommend high-performance, eco-designed, less energy-consuming equipment and calculate returns on investment;
- **implement:** we manage orders, organise logistics and oversee projects from installation through to customer sign-off. Our project management services support our customers throughout the life of the projects;
- **finance:** because financing is the cornerstone of any energy performance project, we provide a suitable financial solution which includes all the aids and subsidies customers are eligible for, so they can facilitate their energy transition without a substantial financial outlay;

- **manage performance:** we collect and compile all energy and economic data using our digital platform.

Our Energy managers restore the data in a clear, efficient way to help our customers make informed decisions.

Our areas of intervention



Ecobuilding: the energy management platform for property portfolios

The **EcoBuilding** offer is an energy management service that uses data intelligence to accelerate the transition. Our dedicated platform manages energy expenditure data, by:

- collecting energy data and influencing factors;
- generating an energy map for property portfolios;
- identifying anomalies and potential savings;
- providing feedback on the outcome of measures and energy efficiency.

E-bike

In Germany, Econocom has launched a new offer for the long-term rental of electric bikes for employees: the monthly payments are deducted directly from the employee's salary.

As with company cars, employees are taxed on benefits in kind, making this solution an attractive alternative to purchasing an electric bicycle.

Since 2022, the Federation of Hospital Institutions of the Knappschaft Health Insurance Organisation (Knappschaft Bahn See) in West Germany, has offered employees long-term rental of electric bicycles, using Econocom as its leasing partner with its new "Smart Bike" master agreement.

Hubreg

Unparalleled on the market, HubReg is a certified multi-manufacturer, contactless enrolment platform that centralises, industrialises and simplifies the process of equipping employees. Once the equipment has been registered – laptops, tablets or smartphones – in HubReg, all users need to do is connect to the Wi-Fi – business or personal – to have their machine mastered, i.e., configured with the core software and profiles decided by their IT department.

- Technical handling reduced to a minimum.
- Simpler, faster, less costly product flow and transport management.
- CSR requirements met thanks to the combined service of delivering new equipment and removing old.

Finops

As part of its consulting services for modernising applications and platforms, Econocom Apps, Cloud and Data has launched Finops (a contraction of Financial Operations) to help customers wishing to migrate to the cloud apply a set of best practices to understand, monitor and control cloud costs and align their costs with the value generated.

Our experts assist our customers in designing and deploying optimised, digitally minimalist applications and architectures. The guarantees digital services that are:

- controlled;
- cost-effective;
- responsible;
- sustainable.

Workplace as a service

With a strong focus on the user experience, the Workplace offer stands out for its end-to-end management of services and its transformation approach. This virtuous model combines technological expertise with outsourcing know-how, in user environments, but particularly in technological and organisational innovation.

The key to this offer is operational excellence: it guarantees the availability of environments, adapting the response precisely to the need, thereby saving on resources, in keeping with a responsible, sensible approach to digital.

5. Social initiatives in France

Patronage of the Démos project of the Paris Philharmonic Orchestra

For the past three years, Econocom has been a sponsor of the Démos project (a social music and orchestral education programme) led by the Cité de la Musique – Paris Philharmonic Orchestra, in particular to support the digital component of this programme.

Démos is a cultural democratisation project that focuses on orchestral music, founded in 2010 by the Cité de la Musique – Paris Philharmonic Orchestra. It offers classical music lessons for children who do not have easy access to it.

The project is aimed at children aged 7 to 12 living in socially and economically disadvantaged urban and rural areas, with little or no access to such services. The system has continued to grow since its launch with more than 50 orchestras currently operating throughout the country, including in the French Overseas Departments and communities. Since 2010, nearly 10,000 children have discovered classical music thanks to this programme.

This initiative is directly in line with the actions carried out by the Group as a responsible digital entrepreneur to foster inclusion and education.

Econocom, partner of Double Horizon

For ten years, Econocom has been a partner of Double Horizon, a non-profit organisation which supports the education of under-privileged people in France and overseas. Econocom has decided to support schools in the priority education network. A survey carried out a few years ago showed that the majority of children from these schools had never been to Paris to visit the monuments and museums,

even by the end of secondary school. Econocom provides material and financial support to combat the school-family digital divide.

Econocom, partner of the Espérance Banlieues association

Espérance Banlieues, founded in 2012, is developing a network of 16 innovative schools located in the heart of priority neighborhoods, with the mission of **preventing school dropouts and promoting the successful integration of young people and their families into society.**

For four years, **Econocom has been in partnership with Espérance Banlieues and shares the same ambitions and values with it.** It has supported the organisation by raising awareness among schoolchildren and taking on interns, donating computers and supporting the development of digital education workshops (including coding training for teachers).

Econocom also supports several educational initiatives including screen-free **digital learning** with Colori. The Colori programme introduces the basics of digital technology in a fun and screen-free way for young children. Activities include games and practical exercises that develop logic and critical thinking.

Thanks to the group's support for the 2023-2024 school year, the Espérance banlieues network was able to carry out Colori workshops in:

- 10 schools all over France;
- 17 classes;
- for the benefit of 200 students for a total of 330 hours.

Econocom, partner of 100,000 entrepreneurs

To create strong ties between schools and businesses, and pass on the entrepreneurial drive to young people, Econocom supports the action of the organisation “100 000 Entrepreneurs”, arranging for entrepreneur volunteers to speak at establishments, from secondary schools to higher education.

Over the past academic year, **more than 127,000** young people were able to meet these women and men who are entrepreneurs in a variety of ways. The association's actions resonate with Econocom, which has always striven to be a responsible digital entrepreneur. We are proud to announce that **since 2007, 100,000 entrepreneurs has introduced more than a million young people to entrepreneurship.**

Econocom, partner of the Maison de l'Amitié association

La Maison de l'Amitié (MDA) is an organisation that reaches out to people in very precarious and isolated situations, who live or are passing through the La Défense district. It welcomes people, develops relationships between beneficiaries and volunteers (employees of local businesses and residents), and offers overall support. In addition to meeting people on the street and providing basic essential services

offered (food, clothing and hygiene), MDA develops, either directly or via partnerships, social, health and cultural actions.

Econocom, A partner of the ZUPdeCO association

ZUPdeCO is an association that aims to reduce academic failure among young people from disadvantaged backgrounds. It was founded in 2005 and has since helped more than 100,000 students. ZUPdeCO's mission is to provide individualised support to middle and secondary school students, with a focus on academic and personal success. With over 80 partner secondary schools and more than 35,000 beneficiary children, ZUPdeCO has implemented various programmes, including online tutoring via Homeclasse.org, influential initiatives such as the “Homework at school, not at home” national manifesto, and partnerships with national education players. They are assisted by a community of over 20,000 volunteers and strive to create fairer, more inclusive learning environments.

Econocom is committed to educational support in order to promote digital accessibility.

In 2024, we decided to support ZUPdeCO again by making a substantial donation of 50 computers in partnership with one of our customers.

Econocom, A partner of the Konexio association

Konexio is a non-profit that aims to reduce the digital divide by offering IT training programmes to people from disadvantaged communities. Initially founded as community workshops in largely immigrant-populated areas of Paris, Konexio now offers a range of digital training, such as introduction to IT and advanced software development. Konexio aims to help marginalised groups achieve social and professional integration.

Econocom has donated around twenty computers to Konexio and is contributing financially to the DigiStart programme. This introductory training programme (20 hours over five weeks) allows participants to:

- learn the basics of web development;
- understand coding;
- find out what being a developer really involves,
- decide whether or not coding is for them.

They are introduced to the basic concepts of programming and the vocabulary of front-end development (HTML, CSS, Javascript). By the end of the session, learners will be able to code their own personal and/or professional website.

At the end of the training courses, Konexio issues its trainees with a certificate that will serve as proof of attendance among potential employers.

This commitment is perfectly in line with our policy of combating the digital divide and supporting vulnerable people who are excluded from employment.

Patronage of Station Debout

Station Debout is a research centre specialising in spinal cord trauma resulting in disability (paraplegia or quadriplegia).

Thanks to patronage and donations, Station Debout can offer free-of-charge exercise sessions tailored specifically for patients with spinal cord injuries. The objective of this initiative is to maintain regular physical activity beyond the rehabilitation period, which is crucial for avoiding complications arising from a sedentary lifestyle.

By supporting Station Debout, Econocom aims to reinforce its commitment to employing people with disabilities, while contributing to an initiative with a positive impact.

Initiatives in the field of digital technology and education	2023	2024
Donations of refurbished laptops at Group level	270	210

6. Societal and environmental commitments on an international scale

Econocom is involved in specific local initiatives in a number of countries, while complying with the group's strategic directions and common action plans.

Our entrepreneurial culture gives each country the freedom to act, in accordance with the local needs and context.

Econocom Belux

In 2024, we continued to strengthen our corporate social responsibility strategy, achieving key milestones and advancing our commitment to sustainability and ethical business practices.

- **improving sustainability standards:** We successfully renewed **our ISO 14001** certification without any non-conformities, thereby reaffirming our commitment to environmental issues. In addition, we celebrated **three years of CSR action plans in collaboration with VOKA**, culminating in **SDG Pioneer** certification.
- **electric transition of our vehicle fleet:** Progressing towards total fleet electrification, we have achieved a **42% electrification rate since the beginning of 2024** and are on track to achieve 100% electrification by 2026.
- **green energy transition:** From 1 January 2025, all our Belgian buildings will be powered **by 100% green energy**, reflecting our commitment to reducing our carbon footprint.
- **innovative business initiatives:**

 - ▶ launch of a **new ecosystem of commercial and financial** partners for our Green & Energy Business Unit, signing of our first contracts (supporting customers in the financing and implementation of green energy projects),
 - ▶ development of a **B2C portal for refurbished IT equipment**, in order to extend the life cycle of IT assets and support the circular economy;
- **raising awareness among stakeholders:** Increased communications efforts have helped increase awareness and engagement among employees, customers and business partners in our sustainability journey.
- **quality learning:** launch of summer school programmes for all employees, quarterly organisation of sales training courses for Account Managers and agents, improvement of the e-learning platform for our competence centres.
- **Televie:** Belux is also the logistics partner of Télévie, a charity operation organised in French-speaking Belgium and the Grand Duchy of Luxembourg by RTL-TVI since 1989 for the benefit of F.R.S-FNRS. It raises funds for cancer research and leukaemia in children and adults. Each year, around ten employee volunteers install hundreds of laptops used to encode donations during the closing evening, which is broadcast live on television.

- **Pink Walk with Pink Ribbon:** Participation in the ninth edition of the pink march for the fight against breast cancer alongside 93 other companies. During this event more than €60,000 was collected through donations allowing Pink Ribbon to use its funds to improve the medical treatment of breast cancer as well as the patients' quality of life.

Econocom Italy

Once again we organised "She Tech Talks", **the monthly editorial initiative aimed at promoting female talent in the STEM** (science, technology, engineering and mathematics) field by highlighting the experiences of expert, dedicated women working for the Econocom group in Italy. With these videos, we aim to inspire the next generation of young women to explore the career opportunities in this industry.

Solidarity and global initiatives: In 2024, Asystel-BDF **reaffirmed its corporate social responsibility commitment through a series of major charitable initiatives.** We supported communities affected by the floods in Bologna, providing donations to the town to help struggling families rebuild their futures. In partnership with ActionAid, we continue our remote support of two children, ensuring they benefit from education, healthcare and growth opportunities. Our support also extends to the African continent, with a donation to Maison St. Joseph, an orphanage in Rwanda that provides literacy classes for children and care for orphans, giving them the opportunity to grow up in a safe and stable environment.

Together with our partner **Spirax Italia, we donated laptops to Cascina San Vincenzo**, an association that supports children, young people and families living with autism on a daily basis, offering activities and opportunities to promote autonomy and inclusion. The new devices will be used in the facility's computer labs, creating learning and growth opportunities for the young people.

During the year, we introduced **"Foorban Fridges"** in Milan to promote healthy eating. Stocked several times a week, it offers nutritious meals with clearly labelled ingredients and calorie content, overseen by a nutritionist. This initiative allows employees to enjoy nutritious meals without leaving the office, thus saving time. In addition, it helps reduce CO2 emissions and the carbon footprint by reducing daily travel and vehicle use.

Econocom Netherlands

FLEET ELECTRIFICATION

In 2024, **Econocom Netherlands made significant progress in electrifying its fleet as part of its sustainability commitment.** The number of leased petrol cars decreased by 19%, while the number of hybrid vehicles increased by 8%. The number of fully electric vehicles increased by 11%, reflecting our commitment to reducing our carbon footprint and promoting environmentally friendly alternatives. This transformation not only fulfils our environmental goals, it also sets an example for the wider business community to transition to more sustainable practices.

CONTRIBUTING TO AN INCLUSIVE, RESPONSIBLE WORKPLACE

By signing the SER (Sociaal Economische Raad) Diversity and Inclusion Certificate, **Econocom Netherlands has reinforced its commitment to fair recruitment practices.** We are committed to fostering a diverse and inclusive workplace, to enable employees to thrive. Through customised skills development schemes, coaching programmes and tailored training on diversity, equity and inclusion, we support people experiencing difficulty entering the job market and create opportunities for growth. Our efforts include transparent compensation schemes, inclusive recruitment processes and continuous internal communication to raise awareness among stakeholders. These initiatives not only strengthen our corporate culture, but also foster creativity and problem-solving across the organisation.

Econocom UK

Econocom UK Ltd has once again been shortlisted for the Franco British Business Sustainable Future Award. This award highlights the responsibilities of business in protecting the planet for future generations and promotes initiatives geared towards sustainability, clean growth, renewable energy, waste management and environmental conservation.

Econocom Germany ENVIRONMENTAL INITIATIVES

At Econocom Germany, we are committed to sustainable development and reducing CO2 emissions from our business. To that end, we have taken the following measures:

- our office building runs exclusively on green electricity and we ensure efficient use of resources across all our operations;
- the company's vehicle fleet consists exclusively of electric and hybrid vehicles, in line with our carbon footprint-reducing goals;
- for professional mobile phones, we work in partnership with a carbon-neutral supplier;
- To encourage sustainable mobility, we offer an attractive bicycle rental programme to employees. This initiative not only promotes soft mobility, but also has a positive impact on our employees and the environment. Furthermore, this bicycle rental scheme has also been very successful with our customers in recent years.

EMPLOYEE WELL-BEING

Our employees are our most valuable asset and we are committed to ensuring their well-being. To that end, since 2022, Econocom Germany has partnered with Nilo Health, a platform dedicated to supporting employee mental health through coaching and counselling services. We have also partnered with Egym Wellpass, which offers our employees discounted access to gyms and wellness facilities all over Germany.

PHILANTHROPY AND DONATIONS

In 2024, Econocom Germany supported digital education by providing a primary school class with 26 refurbished laptops. This contribution is part of our commitment to empowering future generations through education and the right technology.

Econocom Spain

In 2024, Econocom Spain will further strengthen its commitment to sustainable development and social responsibility through a series of positive impact initiatives. Building on the Spanish Climate Change Agency's label that rewards the measurement, offsetting and absorption of carbon emissions, the company continues to step up its efforts to minimise its carbon footprint. In line with the principles of the circular economy, Econocom has expanded its IT equipment reuse programme by providing refurbished devices to its customers and non-profit organisations such as Cruz Roja Española. This year, more than 54,000 IT devices were refurbished. By reusing 16,000 laptops, we

helped save more than 5 tons of CO2 emissions in 2024.

On the social side, Econocom Spain offered its support to the flood victims in Valencia, working with local organisations to provide emergency aid. It made a financial donation and shared useful resources through the NGO Caritas to contribute to the recovery of the Valencian economic and social ecosystem.

Econocom Spain is also a partner of the **Sonrisas Foundation**. A Christmas campaign was organised to **donate toys and food**, as a testament to the company's commitment to helping vulnerable families.

Lastly, we have focused on employee awareness by promoting key issues such as carbon footprint reduction, mental health, diversity and inclusion. (representing nearly 25,000 hours of training in 2024). By incorporating social and environmental dimensions into its overall strategy, Econocom continues to strengthen its local ties and demonstrate its corporate responsibility in Spain.

7. Cybersecurity

Context and policies

- The compromise and loss of personal or strategic data may be the result of malicious actions.
- Data breaches often result in the unavailability of services and tools.
- The image of the Econocom Group may be damaged as a result of this type of event, causing a loss of confidence among customers, partners and employees

The Information System Security Policy (ISSP) for Econocom's activities defines the organisation and responsibilities in terms of information and information systems security.

It aims to ensure the protection of the information managed by Econocom or its subcontractors against any deliberate or accidental event likely to compromise its confidentiality, integrity or availability. Likewise, it strives to ensure the integrity and availability of information systems.

Since the beginning of 2022, the Group has had a CSO (Chief Security Officer) whose mandate is to harmonise security practices and commitments across the galaxy. Acting as a coordinator, the CSO has built a strategy and vision, along with the requisite budget to roll out the strategy. The strategy is based on three key elements: appropriate, demonstrable and collective

security.

The Group's security strategy thus defines a basis called Minimum Viable Security (MVS). The MVS describes a security approach that optimises the efforts required to meet current and future security needs. It is a pragmatic approach suited to each business line. In other words, the operating model maintains the operational independence of each entity in the galaxy, thereby taking into account the specific needs and characteristics of the different business lines. This autonomy is supported by work and security services and tools common to the entire Group.

The Group's security strategy is rolled out simultaneously across the talent, process and tools components. This required close collaboration between the group and local security teams in order to ensure continuous, consistent improvement of the security knowledge of people, practices and technologies across the Galaxy. Similarly, an overhaul of the group's security processes and policies was launched to address current requirements in terms of risks and countermeasures. Lastly, a technological clean-up is also being carried out by the group's IT teams. The aim is to provide digital tooling for stakeholders without the frictions caused by strict security requirements.

8. Protection of personal data

(Additional elements related to our sector of activity)

Data protection: background and policies

Personal data protection is paramount to Econocom in terms of its business, its chain of expertise, its digital business lines and its international development. In addition to complying with national, European and international legislation, Econocom intends to make protecting the personal data of its customers, partners and employees an essential factor of digital trust, intrinsic to its strategy and its digital transformation activities.

To sustain this digital trust, Econocom has designed and rolled out the "Data Protection Programme" across all its entities, transposing legal obligations into compliance policies, directives, procedures and tools and serves as a shared framework for all Econocom entities to carry out their compliance action plans.

A roadmap has been drawn up for the programme, outlining the priority areas with the aim of coordinating all the Group's compliance efforts to achieve the common goals of increasing personal data protection, for the benefit of its customers and employees.

- Overall roll-out of the programme.

The programme is rolled out through a data protection network made up of Data Protection Supervisors representing each country and Data Protection Leads representing each subsidiary. This community of 47 Data Protection

Representatives, led by the Group DPO, is in charge of the operational implementation of the programme and monitoring its progress at the monthly committees, monthly Data Protection Supervisors Committee, and the monthly GDPR France Committee meetings.

The DP Representatives have a collaborative platform, the Data Protection Village, where they can find the necessary resources to ensure compliance of their respective entities.

- Shared directives and procedures.

The programme and its variations in directives and procedures were presented to the managers of the various departments, in particular to the Security, IT and Legal departments.

These directives and procedures are now complete and available to all entities via their DP Representatives, in order to give them practical guidance for implementing compliance. They cover all data protection rules such as the register, individual Rights, Data Breach, Retention Periods, Evaluation of Suppliers-Subcontractors, Data Sharing and Privacy by Design.

The implementation of the programme is presented to the Group's Executive Management each year via the DPO's Annual Report.

- Appropriation of compliance governance tools.

Compliance management requires effective tools and employee's ability to appropriate them.

The digital transformation of Econocom's data protection involved rolling-out the multilingual Data Legal Drive tool. A series of seminars and workshops were held to provide training for the DP Representatives on Register, Privacy Impact Analysis (PIA), Human Rights Management and Data Breach Management modules.

An additional third-party assessment module was recently incorporated into the GDPR compliance management system, requiring the Purchasing Department to assess the GDPR, Security, CSR and Ethics compliance of all Econocom's suppliers and service providers.

Lastly, a series of questionnaires developed by the Econocom DPO team in the Data Legal Drive tool allow operational staff to easily check compliance with GDPR requirements in their day-to-day work: for example the Privacy by Design questionnaire or the evaluation questionnaire on an AI (artificial intelligence) project.

Econocom now has a wealth of documents, a set of simple and effective tools, and above all a global network of DP Representatives to ensure its transition from basic compliance to Privacy Excellence.

05

sustainability report

1. General Information Standard [ESRS 2]	125		
1.1 Basis for preparing the report	125		
1.2. CSR Governance	128		
1.3. Strategy	132		
1.4 Management of material impacts, risks and opportunities	141		
2. Climate change [ESRS E1] [MR]	144		
2.1. Climate change-related remuneration criteria [DR GOV 3]	144		
2.2. Transition plan [E1-1]	144		
2.3. Context: impacts, risks and opportunities [ESRS 2 SBM 3 & ESRS 2 IRO 1]	147		
2.4. Climate change mitigation and adaptation policies [DR E1 2]	148		
2.5. Actions and resources for climate change policies [DR E1 3]	149		
2.6. Targets set for climate change measures [DR E1 4]	154		
2.7. Energy consumption and energy mix [DR E1-5]	155		
2.8. Carbon footprint, gross GHG emissions from scopes 1, 2, 3 [DR E1 6]	156		
2.9. Carbon credits and method of eliminating GHG emissions [DR E1 7]	163		
2.10. Internal carbon pricing [DR E1 8]	163		
2.11. Expected financial effects of climate change [DR E1 9]	163		
3. Resource use and circular economy [ESRS E5] [MR]	164		
3.1. Context: impacts, risks and opportunities [DR IRO 1]	164		
3.2. Policies on resource use and the circular economy [DR E5 1]	164		
3.3. Measures and resources [DR E5 2]	165		
3.4. Objectives [DR E5 3]	167		
3.5. Incoming resources [DR E5 4]	168		
3.6. Outgoing resources [DR E5 5]	168		
3.7. Expected financial effects of resource use and the circular economy [DR E5 6]	170		

4. Company employees [ESRS S1]	171		
[MR]			
4.1. Stakeholder interests and views [ESRS 2 SBM 2]	171	4.16. Health and safety in the workplace [S1-14]	200
4.2. Significant impacts, opportunities and risks and their relation to strategy and business model [ESRS 2 SBM 3]	172	4.17. Work-life balance [S1-15]	201
4.3. Human Resources Policies [S1-1]	174	4.18. Remuneration indicators [S1-16]	201
4.4. Econocom's commitment to its employees [S1 -2]	178	4.19. Human rights incidents and complaints [S1-17]	204
4.5. Communication channels and negotiation processes to address negative impacts [S1-3]	181	5. Value chain workers [ESRS S2]	206
4.6. Actions and approaches to address defined policies [S1-4]	182	[MR]	
4.7. Targets for the management of negative and positive impacts [S1-5]	185	5.1. Stakeholder interests and views [ESRS 2 SBM 2]	206
4.8. Characteristics of the company's employees [S1-6]	189	5.2. Material Impacts, Risks and Opportunities as well as their interactions with Econocom's strategy and economic model [ESRS 2 SBM 3]	206
4.9. Characteristics of non-employees [S1-7]	192	5.3. Value Chain Worker Policies [DR S2-1]	208
4.10. Collective bargaining and industrial relations [S1-8]	193	5.4. Process of dialogue and interaction with workers in the value chain and/or their representatives [S2-2]	209
4.11. Diversity [S1-9]	194	5.5. Processes and communication channels to address negative impacts and enable value chain workers to raise concerns [S2-3]	210
4.12. Equal pay [S1-10]	196	5.6. Actions and resources for value chain worker policies [S2-4]	211
4.13. Social protection [S1-11]	197	5.7. Targets established in relation to actions [S2-5]	213
4.14. Disability [S1-12]	197		
4.15. Training and skills development [S1-13]	198		



6. Consumers and end users		7. Business Conduct [ESRS G1] [MR]	216
[ESRS S4] [MR]	214	7.1. ESRS 2 General information	
6.1. Stakeholder interests and views		standard data [GOV-1 & IRO-1]	216
[ESRS 2 SBM 2]	214	7.2. Vision and corporate culture [G1-1]	216
6.2. Material Impacts, Risks and		7.3. Supplier Relationship	
Opportunities and their		Management [G1-2]	220
interactions with Econocom's		7.4. Prevention and fight against	
strategy and business model		corruption and bribery [G1-3]	221
[ESRS 2 SBM 3]	214	7.5. Incidents of corruption or bribery	
6.3. Policies with respect to		[G1-4]	223
consumers and end users [DR		7.6. Political influences and lobbying	
S4-1]	214	activity [G1-5]	223
6.4. Process of dialogue and		7.7. Payment practices [G1-6]	223
interaction with consumers and			
end users [S4-2]	215	8. Regulation: european green	
6.5. Processes and communication		taxonomy	224
channels to address negative			
impacts [S4-3]	215		
6.6. Actions et resources related to			
consumer and end-user policies			
[S4-4]	215		
6.7. Targets established in relation to			
actions [S4-5]	215		

1. General Information Standard [ESRS 2]

1.1 Basis for preparing the report

1.1.1 GENERAL BASES FOR PREPARING SUSTAINABILITY REPORTS [DR BP-1]

Information on the scope of the report [DP-3]

[DP-5a ; DP-5b ; DP-5c]

The scope includes all subsidiaries of the group and on a consolidated basis of publication in accordance with the financial statements. Due to their independence, agents are excluded from the scope of publication. Any other exclusion from the scope is mentioned and justified in the relevant paragraph(s). Data collection is carried out over a closed calendar year, from January 1 to December 31. The information in the sustainability reports concerns elements at upstream and downstream of Econocom's value chain.

[DP-5d]

Econocom did not fail to disclose ESRS-related information because it was considered to be classified as confidential or sensitive.

[DP-5e]

Econocom did not fail to disclose ESRS-related information because it was under development

1.1.2 SPECIFIC PRINCIPLES OF PREPARATION [DR BP-2]

Definition of timelines [DP-6]

[DP-9 ; DP-9a]

The definition of timelines is aligned with the requirements of the CSRD regulation:

- short term: less than 1 year;
- medium term: 1-5 years;
- long term: over 5 years.

Value chain metrics [DP-10]

[DP-10a]

Definition of metrics:

Quantitative performance indicators (metrics) including value chain data concern mainly the environmental standard on climate change (ESRS-E1) and the circular economy and the use of resources (ESRS-E5). These estimates relate to:

- the calculation of scope 3 of the 2024 carbon footprint (the assumptions of this calculation will be detailed in section [ESRS E1-6 gross emissions scope 1, 2 and 3]);
- the issue of the quantity of resources from the circular economy and the treatment and repurposing of used assets (often outsourced for reconditioning).

[DP-10b]**Definition of the establishment base:**

The assumptions for calculating these metrics are detailed in the respective Disclosure Requirements (DR) and Application Requirements (AR), in the relevant standards.

- the assumptions for calculating and collecting scope 3 data are described in section E1-6de of the “climate change” standard;
- the assumptions for calculating and collecting metrics for the treatment and recovery of used assets are described in sections E5-4 and E5-5 of the “resource use and circular economy” standard.

[DP-10c]**Defining the level of accuracy resulting from the use of value chain metrics:**

- ESRS E1 Standards:
 - ▶ for the calculation of the carbon footprint based on monetary data, the level of granularity chosen is that of the legal entity itself or of the country (in particular for data of scope 1 and/or 2). However, we have estimated the calculation on discontinued entities (intended for sale or transfer)⁽¹⁾,
 - ▶ Scope 1 and Scope 2 data were calculated using physical data (the level of granularity nevertheless depends on the availability of the information);
- the exercise has not yet been carried out for 2024 but for 2023: the difference between the carbon footprint based exclusively on financial data and the carbon footprint partially based on

physical data amounts to 48% (we have 48% physical analysis on the 2023 Greenly footprint and 0% on the 2024 monetary footprint).

- for scope 3 data:
 - ▶ the conversion factors used are average sector data based on types of expenditure and were used in the absence of specific data from the main stakeholders in the value chain,
 - ▶ In addition to scope 3 based solely on monetary data, the group produces a second carbon assessment based partially on physical rather than monetary consumption indicators⁽²⁾;
- ESRS E5 Standards:
 - ▶ the data was collected for each country (both through our internal resources and our external partners),
 - ▶ The scope of analysis of the E5 standard information focuses only on IT product purchases (for all activities).

[DP-10d]**Planned measures to improve the accuracy of value chain metrics:**

- ESRS E1 Standards:
 - ▶ Several projects aimed at improving the collection of our value chain metrics have been carried out and/or are in progress (these plans have mainly been deployed on metrics linked to climate change),
 - ▶ industrialisation of extra-financial reporting (particularly on the carbon footprint) thanks to the implementation of the Tagetik tool,

(1) These discontinued, non-representative subsidiaries account for 1.5% of the group's emissions.

(2) The data used to calculate scope 3 of the carbon footprint was determined with the assistance of a specialist service provider (Greenly) based on the nature of each subsidiary's purchases.

- ▶ improvement and precision of the methodologies for calculating scope 3 of the group's monetary carbon footprint,
- ▶ deployment of quarterly reporting on metrics included in sections E1-5 and E1-6 on climate change and on metrics relating to circular economy data;
- ESRS E5 Standards:
 - ▶ work more with our partners to improve the collection of data on the circular economy.

Sources of estimates or uncertainty [DP-11]

The elements included under [DP 10c] relating to the use of metrics in the value chain are the main sources of estimates and uncertainty for Econocom are as follows:

[\[DP-11a ; DP-11b\]](#)

- ESRS E1 Standards:
 - ▶ information relating to the production of Disclosure Requirement E1-5 and E1-6 data has been consolidated for so-called "continuing" subsidiaries **via the new Tagetik reporting tool**,
 - ▶ One source of uncertainty concerns the data from so-called "discontinued" subsidiaries (as opposed to continuing ones) which were estimated on a macro basis and based on the results/assumptions of continuing activities,
 - ▶ another source of uncertainty concerns the calculation of scope 3 categories (see carbon footprint assumptions);
- ESRS E5 Standard:
 - ▶ the CSRD metrics (ESRS E5-4 and E5-5) presented may be estimates (indicators

collected from subcontractors of the group's subsidiaries in each country) of the volume of assets processed during the 2024 financial year,

- ▶ The volume of assets purchased by P&S activities from the circular economy also presents a source of uncertainty. We considered that only 1% of the purchases of distribution activities came from circular markets (see section E5-5).

Change in the preparation and presentation of sustainability reports [DP-13]

[\[DP-13a\]](#)

In 2024, Econocom published its first sustainability report (disclosure of CSRD ESRS standards), while the previous reports were Extra-Financial Performance Declarations (in 2023, Econocom had adopted a combined EFPD and CSRD approach).

Incorporation by reference [DP-16]

Identified as incorporated by reference:

[DP 21a] – Composition of governance bodies

[DP 40a] and [DP 40b] – major product groups and major markets or customer groups

[DP 42] – description of the economic model

Transitional measures [DP-17]

[\[DP 17a & DP 17 b\]](#)

No transitional measures, as defined by the appendix to ESRS 1 which specifies that only companies with < 750 employees may be exempted from reporting standards on their value chain, were used.

1.2. CSR Governance

1.2.1 THE ROLE OF ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES [DR GOV-1]

Management of the approach

Econocom's CSR policy involves all Group employees. The CSR Department is headed by Véronique di Benedetto, Vice President France. This department presents the CSR policy to the Board of Directors and other management bodies.

The policy is managed by a CSR Steering Committee comprising Directors of the Group's main functions. It approves the strategic priorities and objectives of the CSR programme and ensures that objectives are met.

A panel of CSR functional and geographical correspondents has also been set up. These correspondents are members of the operational teams of the CSR Steering Committee members and are responsible for meeting objectives in their respective areas. They implement the action plans approved by Committees, and also act as ambassador for the policy to their teams.

[\[DP 21a – 22c\]](#)

The Management Report provides details on the composition of the Group's Board of Directors, Executive Committee and CSR Steering Committee, as well as information on their diversity and skills (see "Corporate Governance" chapter).

[\[DP 22d\]](#)

The entire process for defining Impacts, Risks and Opportunities and their resulting policies/actions have been approved by several members of the Management team (Financial Management and CSR

Management, whose Director is also a member of the Board of Directors). All the operational Departments and support functions such as HR or Finance are responsible for monitoring their policies and risks. Operational meetings are held to report any critical cases or make any necessary adjustments. In addition, the monitoring of the strategic plan, which includes extra-financial elements, is subject to ad hoc monitoring by the Executive Committee and CEO.

1.2.2. PROCESSING OF SUSTAINABILITY INFORMATION AND ISSUES BY SUPERVISORY BODIES [DR GOV-2]

[\[DP 26a\]](#)

Members of the administrative bodies are apprised of sustainability issues during the annual closing Audit Committee, via other Committees (such as the CSR Committee or the Committee which oversees the strategic plan).

[\[DP 26b et DP 26c\]](#)

There are two levels of reporting: one on all policies and KPIs that was presented to the Audit Committee and CEO. This takes place once a year with possible intermediate requests on specific subjects. In addition, there is specific reporting carried out by the cross-functional unit in charge of monitoring the strategic plan on the KPIs and extra-financial objectives set within this framework. This reporting is subject to more systematic monitoring, with monthly meetings on the subject and workshops in France and internationally. The results are communicated to the Executive Committee and the CEO and can also be sent to the Board of Directors when the CEO deems it important.

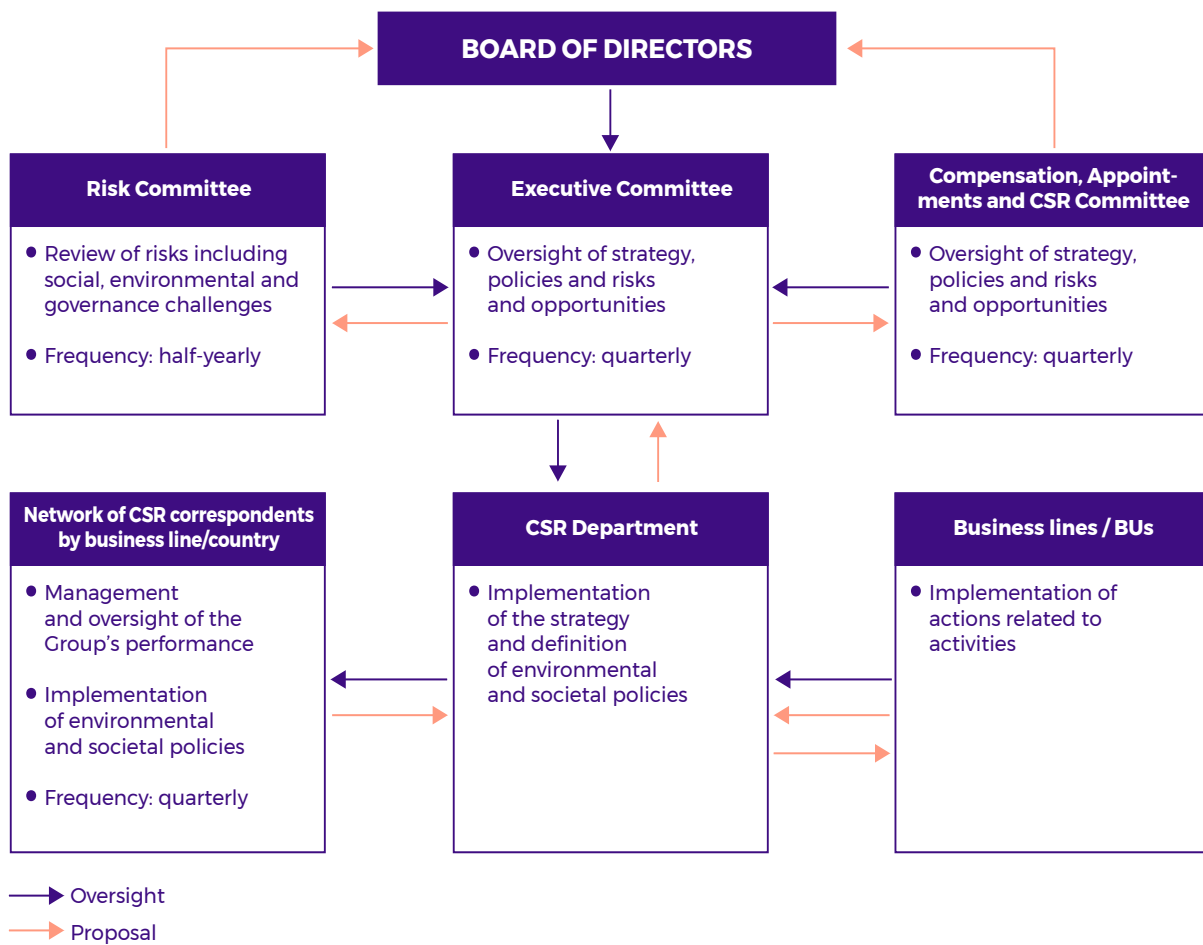
1.2.3. INCOPORATING SUSTAINABILITY-RELATED PERFORMANCE INTO INCENTIVE SYSTEMS [DR GOV-3]

[DP 29a]

Econocom’s incentive system includes sustainability performance elements. For the members of the group’s CSR Committee, part of their annual targets (variable part of the salary) is based on sustainability-related goals. These are described in section E1 -GOV3

1.2.4. SUSTAINABILITY DUE DILIGENCE REPORTS [DR GOV-4]

[DP 32]



Appendix under the CSRD to highlight the parts of the report where we mention the elements of due diligence:

Key elements of sustainability due diligence:

a) Incorporate sustainability due diligence into the group's governance, strategy and business model;

- ESRS E1 - GOV 3 (section 2.2.)
- ESRS G1 - GOV 1 (section 7.1.)

b) Stakeholder engagement in key steps of due diligence;

- ESRS S1 - Strategy, Business Model 2 (section 4.1.)
- ESRS S2 -SBM 2 (section 5.1.)
- ESRS S4-SBM 2 (section 6.1.)

c) Identify and assess negative impacts;

- ESRS E1 - SBM 3 (section 2.3.)
- ESRS S1 - SBM 3 (section 4.2.)
- ESRS S2 - SBM 3 (section 5.2.)
- ESRS S4 - SBM 3 (section 6.2.)
- ESRS E1 - Impacts, risks, opportunities 1 (section 2.3.)
- ESRS E5 - IRO 1 (section 3.1.)
- ESRS G1 - IRO 1 (section 7.1.)

d) take actions to address its various impacts;

- ESRS E1 - Minimum Disclosure Requirement Policies & Actions (section 2.1. / section 2.4. / section 2.5.)
- ESRS E5 - MDR P&A (section 3.2. / section 3.3.)
- ESRS S1 - MDR P&A (section 4.3. / section 4.4. / section 4.5. / section 4.6.)
- ESRS S2 - MDR P&A (section 5.3. to section 5.6.)
- ESRS S4 - MDR P&A (section 6.3. to section 6.6.)
- ESRS G1 - MDR P&A (section 7.2. to section 7.4.)

e) monitor the effectiveness and communicate on the efforts made;

- ESRS E1 - Minimum Disclosure Requirement Targets & Metrics (section 2.6. through section 2.11.)
- ESRS E5 - MDR T&M (section 3.4. / section 3.5. / section 3.6. / section 3.7.)
- ESRS S1 - MDR T&M (section 4.7. to section 4.19.)
- ESRS S2- MDR T (section 5.7.)
- ESRS S4 - MDR T (section 6.7.)
- ESRS G1 - MDR T&M (section 7.5. to section 7.7.)

1.2.5. RISK MANAGEMENT AND INTERNAL CONTROL OVER SUSTAINABILITY REPORTING [DR GOV-5]

[DP 36a -36e]

The risk assessment methodology for materiality analysis and stakeholder control over the drafting of sustainability statements is described in the IRO data points – 1 of the standard.

Additionally, for better risk management, subordinate controls on certain standards or data points have been implemented and are operated by different departments:

Carbon footprint data (ESRS E1): an initial check is carried out at the level of areas of responsibility and carried out by the Financial Departments of these areas. We use financial data to calculate emissions from purchases and business travel. The data is therefore the same between the financial and extra-financial elements. We have added technical checks in the Tagetik tool to ensure maximum reliability of the data.

Lastly, an independent third party (Greenly) also calculates and validates the carbon footprint **published** with a one-year delay (the carbon footprint calculated, using a physical approach, is that of 2023).

Data on Econocom employees (ESRS S1): The CSR department puts the Human Resources department in charge of collecting employee-related data (both qualitative and quantitative). The data is then uploaded to the Tagetik tool and aggregated there. The department, as it is in charge of drafting the report, carries out a final check on the data.

Business Conduct Data (ESRS G1): The processing and analysis of this data was the result of a joint effort by the Legal/ Compliance department (who also approved certain requirements of the standard) and the group's CSR department.

The various reports are sent to the decision-making and supervisory bodies once a year when the annual report is published.

1.3. Strategy

1.3.1 STRATEGY, BUSINESS MODEL AND VALUE CHAIN[DR SBM 1]

[DP 40a ; 40b]

All elements relating to the economic model (products and/or services, as well as the markets in which the group operates) are explained in “**chapter 1: Presentation of the group’s solutions**” of the universal registration document.

The three sectors of activity in which the group operates and which are closest to the sectors eligible according to the ESRS ⁽¹⁾ are as follows:

- P & S = Wholesale ;
- TMF = Banking & Service;
- Services = Software & IT Services.

“ONE ECONOCOM” STRATEGIC PLAN:

In November 2023, Econocom presented its new strategic plan for 2024-2028. This plan, called “One econocom”, includes, for the first time, both financial and extra-financial targets.

The financial objectives aim to initiate a phase of solid, mainly organic growth ⁽²⁾:

- achieve revenue of €4 billion in 2028 with a first step at €3.4 billion in 2026;
- double net profit to reach €130 million in 2028;
- reduce net financial debt.

[DP 40e – 40g]

The extra-financial objectives aim to strengthen Econocom’s impact in terms of digital transformation and have the same timelines as the financial objectives (2024 – 2028):

- triple the number of assets recycled or reconditioned and double the number of assets repaired in our repair centres (for the supply and leasing businesses);
- obtain the Ecovadis Platinum medal to join the Top 1% of companies committed to CSR. **Econocom has been certified gold medal since 2024.** This concerns all its business lines;
- Obtain SBTi validation of these targets. As validation was obtained in June 2024, Econocom’s objective is now to meet the decarbonisation target (described in detail in the transition plan of the climate change standard);
- double the proportion of employees with disabilities to reach 6% by 2028. This concerns all its business lines;
- exceed the score of 90/100 for the Gender Equality Index. This concerns all its business lines.

To achieve its strategic plan, the group is relying on several growth drivers to enable it to increase its market share with new customers and develop revenue with its existing client base:

- the group will thus step up its recruitment and training efforts for its sales teams to strengthen the coverage of its target areas and improve sales performance;

(1) [https://www.efrag.org/sites/default/files/sites/webpublishing/SiteAssets/Working%20Paper%20Draft%20ESRS%20SEC1%20Sector%20Classification%20Standard\[1\].pdf](https://www.efrag.org/sites/default/files/sites/webpublishing/SiteAssets/Working%20Paper%20Draft%20ESRS%20SEC1%20Sector%20Classification%20Standard[1].pdf).

(2) Mobilising internal resources

- Econocom will also enhance its range of solutions to further incorporate the “As-a-Service” component; it offers customers a seamless experience thanks to value-added services and the positive impact dimension;
- synergies between solutions and geographies will also be strengthened to speed up deployment of the group’s expertise by leveraging its leadership in Europe;
- Lastly, Econocom will continue to acquire companies in certain specific regions in order to expand or acquire new skills (such as reconditioning).

[\[DP 42\]](#)

The company’s business model is described in more detail in another part of the Management Report, in **chapter 1**: “Presentation of the group’s solutions”.

[\[DP 42a – 42c\]](#)

The complexity in describing the group’s value chain is mainly due to the sheer diversity of sectors it operates in. For this reason, it is advisable to analyse the value chains of the different sectors individually, as follows:

- **Supply (P&S: Product and Solutions):**

The main tier 1-suppliers are mostly hardware manufacturers such as Lenovo, Dell, Apple, etc. Buyers at Econocom are Sales Administrators: the customers ask them to distribute the hardware of a

supplier already identified by said customer. Customer profiles are diverse (ranging from the private to the public sector).

- **Leasing (TMF: Technology Management Financing):**

TMF’s main Tier 1-suppliers are similar on the **IT** side to those of P & S. On the **non-IT** side, which remains quite significant across the group, purchases and their distribution by suppliers are more diversified and therefore more complicated to identify. Even today, the group is working to clarify the composition of non-IT suppliers, with a view to improving the physical analyses of its carbon footprint on the products concerned.

Lastly, the TMF activity operates largely through external refinancing of lease contracts, mainly with banks (such as Crédit Agricole, Société Générale, etc.). The clients are diversified as for the P & S activity.

- **Services:**

The Services businesses, by their very nature, involve fewer purchases than the other two activities. Unlike the other two, the buyers of the services entities are not Sales Administrators. Their suppliers will often also be major IT players such as Microsoft, HP, but also temping agencies such as Randstad, Adecco, etc. Their customers are also very diversified (private and public sectors).

1.3.2. INTERESTS AND VIEWS OF STAKEHOLDERS [DR SBM 2]

[DP 45 ; DP 45a]

Table of stakeholders involved in the double materiality analysis:

<p>Financial community</p> <p>Shareholders</p> <p>Deputy Corporate Legal Director</p> <p>Insurance</p> <p>External consultant (BC - Legal)</p> <p>Banks</p> <p>Treasury Director</p> <p>Investors</p> <p>M&A Director</p>	<p>Commercial stakeholders</p> <p>Industry players</p> <p>Group CSR Director</p> <p>Cloud providers</p> <p>Director of IT Systems</p> <p>Service providers (hardware manufacturers, software)</p> <p>Operations and Marketing Director</p> <p>Service providers</p> <p>Operations Director (WII)</p>	<p>Internal stakeholders</p> <p>Candidates Talent</p> <p>Human Resources Director</p> <p>Employees, Trade unions</p> <p>Local HRD SSE Cross-Cutting Services</p> <p>Human Resources Director</p> <p>Management</p> <p>Human Resources Director</p>	<p>Institutional stakeholders</p> <p>Local authorities</p> <p>Group CSR Director</p> <p>Legislators</p> <p>Group Legal Director</p> <p>Managers Risks and compliance</p>
		<p>Local stakeholders</p> <p>Schools/ Training</p> <p>Director, HR Excellence Division</p> <p>Integration structures</p> <p>Brokerage Director France</p> <p>End users</p> <p>Agent Business Manager</p> <p>TMF Development Director</p> <p>Business Unit Director</p>	
<p>Customers</p> <p>Services, leasing and supply business development departments</p>		<p>Civil society</p> <p>Associations</p> <p>CSR Manager</p> <p>Media</p> <p>Group Communications Director</p>	

In the course of our **internal** consultation, 19 categories of stakeholders were identified.

[DP 45b]

Our approach to assessing materiality through **sustainability due diligence** aims to understand stakeholders' views on the topics and their priority in their relationship with the Econocom group.

Initially, these stakeholders were consulted indirectly through Econocom contributors (see table above). For these indirect consultations, the group ensured that the

Econocom contributors interviewed were well aware of the stakeholders' expectations for assessing the group's sustainability impacts, risks and opportunities. The results of these indirect consultations were then shared with all members of the working group responsible for assessing the material sustainability impacts, risks and opportunities for the Econocom group.

This assessment was therefore carried out taking into account the stakeholders' considerations.

Furthermore, in order to confirm the results of the assessment of material Impacts, Risks and Opportunities, we conducted interviews with key **external** stakeholders in our value chain in September 2024. We therefore extended the analysis and the "challenge" of our double materiality analysis to customers (of equipment and services), IT suppliers and banks. The purpose of these interviews was to confirm the conclusions of our double materiality analysis on the IROs determined as non-material for the Econocom group but **close to being** so according to the criteria defined by the group and also to ensure that no material subject for these stakeholders had been overlooked.

Lastly, the results were presented to the various department managers who were involved in the analysis (ultimately, report, the Audit Committee validated them by signing the 2023).

[\[DP 45c\]](#)

These external consultations allowed us to confirm that these subjects were non-material for these stakeholders and that no IROs or issues should be added as "new" in our materiality matrix. Nevertheless, certain issues which were either only financial or only impactful could become doubly material.

[\[DP 45d\]](#)

The conclusions of the stakeholder consultations (internal and external) were not shared with the bodies as a whole. However, as mentioned, some people (members of different decision-making bodies), actively participated in the scoring of the IROs.

1.3.3. ISSUES SELECTED AS MATERIAL AND THEIR INTERACTION WITH THE GROUP STRATEGY [DR SBM 3]

[DP 48a -48g & DP 49]

Information on IROs is provided in the various chapters on the corresponding ESRS standards. The Group therefore limits itself here to declaring its significant impacts, risks and opportunities.

Environmental Standards Matrix (ESRS E1 and E5)

ESRS E1 [DP 49]

Sub-topic	Material challenges	Direct activities/ value chain	Financial rating	Impact rating	Associated IROs
Climate change adaptation	Resilience of supply-chains	Upstream value chain	11.25		Risks Price volatility/Potential shortages of materials, supply interruptions/ Damage to reputation/ Growth constraint of revenue and/or cost high capital Opportunities Promoting value chain resilience.
	Strengthening environmental regulations in energy matters	Direct activities + value chain (upstream and downstream)		14	Impact Reducing environmental impact thanks to regulatory supervision (+)
	Strengthening environmental regulations on the impact of digital technology	Direct activities + value chain Downstream	11.25	11.2	Impact Reducing the impact on the environment thanks to regulatory supervision (+) Risks Market share drop/ Regulatory non-compliance Opportunities -Growing demand sustainable technology/ Compliance/ Cost control
	Strengthening environmental regulations on the product life cycle	Value chain Upstream and downstream	11.25		Risks Additional costs Opportunities Competitive Advantages/Cost Reductions
Climate change mitigation	(Scope 3) Downstream emissions	value chain Downstream		12	
	(Scope 3) Emissions related to purchases	value chain Upstream		15	Impact Greenhouse gas emissions that contribute to global warming (-)
	(Scope 3) Emissions related to business travel	Direct activities		13	
	Changing End User Requirements	Value chain Downstream		10.67	Impact Potential positive impact on the environment of a reduction in energy consumption, mining resources and a decrease in CO2 emissions (+)
Energy	(Scope 1 & 2) Energy consumption	Direct activities		14	Impact Energy consumption accounts for a significant proportion of greenhouse gas emissions (-)

ESRS E5 [DP 49]

Sub-topic	Material Challenges	Direct activities/ value chain	Financial rating	Impact rating	Associated IROs
Resources outflows related to waste	Management of electronic waste and treatment of non-recoverable waste and not valued	Direct activities + value chain Downstream	12	10.6	Impact Positive impact on pollution and waste generation (+) Risks Costs associated with revaluation / Impact on Reputation Opportunities Long term savings/ New market opportunities
	Strengthening environmental regulations in terms of treatment and discount computer waste	Direct activities + Upstream value chain	11.25		Risks Increased costs of an operation, loss of attractiveness and market share, deterioration of image Opportunities Attractiveness and value of assets, increased interest in assets, market share gains, competitive advantage
Resources inflows, including resource use	Optimisation of uses through development of the economy of functionality	Direct activities + downstream value chain		12	Impact Positive impact on product footprint (multiplication of uses) (+)
	Promotion of the economy circular in the digital sector	Direct activities + downstream value chain	10.5 ⁽¹⁾	13	Impact Positive impact on carbon footprint and conservation of natural resources/ Reduction of electronic waste (+)
Resources outflows related to products and services	Recycling and reuse of products and materials	Direct activities + value chain Downstream		10.7	Impact Positive impact on pollution and waste generation (+)
	Eco-design products digital	Direct activities + value chain Downstream		12	Impact Positive impact on product footprint (+)

(1) This new note was added following the conclusions of the consultation of external stakeholders. The issue related to the promotion of the circular economy becomes in this sense a doubly material issue. However, this note should be qualified because it will need to be "challenged" by other stakeholders.

Social Norms Matrix (ESRS S1, S2 et S4)

ESRS S1 (no financial materiality on this standard, hence impact rating only) **[DP 49]**

Sub-topic	Material Challenges	direct activities / value chain	Impact Rating	Associated IROs
<i>Equal treatment opportunities for all</i>	Adequacy of skills and development of training	Direct activities	11	Impact Maintaining competitiveness/ Positive impact on the employability and performance of employees/ Digital inclusion (+)
	Diversity and inclusion within the teams	Direct activities	11	Impact Climate of trust and respect, well-being at work (+)
	Employment and inclusion people in situation of handicap	Direct activities	10	Impact Positive social impact (+)
	Fight against all forms of discrimination at work	Direct activities	11	Impact Positive social impact of the implementation of the fight against discrimination (+)
<i>Other work-related rights</i>	Respect for human rights in our activities	Direct activities + value chain	12	Impact Potential impacts related to the value chain: Deterioration of the working climate, unfair working conditions, exploitation and forced labour, discrimination and harassment, lack of social protection, lack of transparency (-)
	Safety and protection employees' personal data	Direct activities	11	Impact Damage to personal life, insecurity, stress and worry, loss of trust in employer (-)
<i>Working conditions</i>	Collective agreements (regulatory and non-mandatory)	Direct activities	10.4	Impact Creating a social culture strong and a climate of trust (+)
	Employee management on a non-permanent employment contracts (e.g. fixed-term contract, temporary workers, extra staff, etc.)	Direct activities	11	Impact Job insecurity (-)
	Remuneration policy and social benefits (including value-sharing system)	Direct activities	10.05	Impact Decent wage, strengthening of corporate culture and well-being at work (+)
	Quality of life at work (including work-life balance)	Direct activities	10.65	Impact Well-being at work (+) or (-)

ESRS S2 [DP 49]

Sub-topic	Material Challenges	Direct activities/ value chain	Impact Rating	Associated IROs
<i>Other work-related rights</i>	Respect for human rights at suppliers and their subcontractors	Value Chain Upstream	10	Impact Potential impact of human rights violations in the event of unreliability and certification of the complete supply chain: unfair working conditions, exploitation and forced labour, discrimination and harassment, lack of social protection. (-)
<i>Working conditions</i>	Working conditions suppliers and of their subcontractors	Value Chain Upstream	10	Impact Potential impact on health and security within the chain of value (supplier) (-)

ESRS S4 [DP 49]

Sub-topic	Material Challenges	Direct activities/ value chain	Financial rating	Impact Rating	Associated IROs
<i>Information-related impacts for consumers and/or end-users</i>	Protection and security of personal data of the customer in the collection, use and storage of data	Direct activities + Value Chain Downstream		10.3	Impacts Collection, use and storage of data that can impact the safety of people. Storage and processing also has an impact on the environment (energy consumption). (-)
	Raising customer awareness of CSR issues	Direct activities + Value Chain Downstream	12		Risks Financial costs associated with awareness-raising operations, reduction in demand if there is no adequate response to customer expectations in terms of CSR, loss of market share Opportunities Competitive advantage/ Increase in demand/ Gain in market share
<i>Social inclusion of consumers and/or end-users</i>	Incorporating innovations into products and services, taking into account new uses and lifestyles			10.5	Risks Obsolescence and depreciation of asset value, decline in occupancy rates, loss of shares market Opportunities Attractiveness and value of assets, optimising occupation rates, Gain in market share
	Fair and responsible business practices			12.75	Risks Deterioration of customer relations, questioning of the Group's liability in the event of unfair practices (competition authority), loss of market share Opportunities Improved customer loyalty and client recommendations, establishment of transparent and trusting relationships with customers, Gain in market share

Business Conduct Standards Matrix (ESRS G1)

ESRS G1 [DP 49]

Sub-topic	Material Challenges	Direct activities/ value chain	Financial rating	Impact Rating	Associated IROs
Corporate culture	Adherence to the company's culture and values, helping to develop a sense of belonging and employee engagement rates	Direct activities	12		<p>Risks Poor governance and insufficient awareness of CSR can lead to financial risks (non-strategic investments), operational risks (lack of internal controls) and legal and regulatory risks (non-compliance with regulations).</p> <p>Opportunities Reduction of financial risks, sustainable financing opportunities, improvement of brand image (+ transparent),</p>
Management of relationships with suppliers including payment practices	Continuity of supply of materials and services (quality of supplier relationship, financial stability)	Direct activities + Upstream value chain	10.5	10	<p>Impacts Negative impact on service providers in the event of non-payment or non-compliance with payment deadlines which could impact the maintenance of the service provider's and supplier's activity, and drop in cash flow (-)</p> <p>Risks Risks of supply chain disruption if a key supplier experiences financial problems, bankruptcy or significant delivery delays/Damage to the company's reputation in the event of inappropriate payment practices towards suppliers.</p> <p>Opportunities Building strong and lasting partnerships with reliable suppliers. Cost reduction (advantageous contracts, discounts on purchasing volumes, etc) Strengthening the company's reputation (good payment practices)</p>

The double materiality assessment provides a refined and precise level of analysis of the group's impacts, risks and opportunities. It has made it possible to exclude certain sub-topics:

N°	ESRS – Theme	Sub-topics considered not applicable to Econocom's activities
E3	Water	Water consumption
E4	Biodiversity and ecosystems	Direct impact factors of biodiversity loss: invasive alien species, population size, etc.
S1	Employees	Other work-related rights – Adequate housing
S3	Affected communities	Civil and political rights – Freedom of expression, freedom of assembly, impact on human rights defenders
		Rights of Indigenous Peoples – Free, Prior Consent, Self-Determination
S4	Consumers and end users	Information – Access to quality information
		Safety – Personal safety and child protection
		Social inclusion – Non-discrimination
G1	Business Conduct	Animal welfare practices

1.4 Management of material impacts, risks and opportunities

1.4.1 DESCRIPTION OF THE PROCESS FOR IDENTIFYING AND ASSESSING MATERIAL IMPACTS, RISKS AND OPPORTUNITIES FOR ECONOCOM [DR IRO 1]

[DP 53a -53g]

Definition of double materiality as defined by ESRS 1 – 3:

- a subject is material from an **Impact** perspective if probable or actual events (whether positive or negative) are identified that prove that the company impacts the environment or Society in the short, medium and long term. Impacts include those that Econocom has caused and those resulting from its activities;
- a financial issue is material from a **financial** point of view if risks or opportunities have been identified and may have a major impact on the company's financial flows over different timelines (cash flow, development, position, cost of capital or access to group financing);
- a subject can be important from both points of view (this subject will be considered **Doubly Material**).

Methodology used

Econocom set up a working group composed of people from different strategic departments (Central Finance Department, Human Resources Department and CSR Department). This working group was assisted by the

consulting firm Mazars throughout the double materiality assessment in order to provide methodological support. The analysis was carried out by taking into account the different sectors of activity in which Econocom operates (supply, leasing and services) and then the potentially significant sustainability issues were aggregated at group level. A significant list of Impacts, Risks and Opportunities was established based on stakeholder consultations, previous EFPD reports and sector analyses. Both the IROs specific to the Econocom group and the value chain of its various activities were analysed. All potentially significant IROs (around 100 IROs) were assessed according to their financial and impact significance.

The double materiality assessment process is defined as follows:

- **Assessment of impact materiality**
 - ▶ Determination of the type of impact (positive, neutral or negative) and its temporality (actual or potential).
 - ▶ Assessment of Impacts, Risks and Opportunities (IRO) through workshops with internal contributors based on the ESRS evaluation criteria (magnitude, scope, reversibility). Each of these three criteria was evaluated on a scale of 1 to 5.
 - ▶ Calculation of the final impact materiality assessment by adding the three numerical criteria (and multiplying by a probability of occurrence for potential impacts with a view to assigning each impact a total score out of 15).
 - ▶ Determination of significant IROs by retaining IROs above the threshold of 10.

• **Assessment of financial materiality**

- ▶ IRO assessment through workshops with internal contributors based on the ESRS assessment criteria (2) (severity of financial effects and probability of occurrence). A scale from 0 to 5 was used.
- ▶ Calculation of the final assessment of financial materiality by multiplying the two criteria above.
- ▶ Weighting of the scores awarded in order to harmonise the financial and

impact scores on a common total of 15 with a view to selecting the material issues for the group.

- ▶ Determination of significant IROs by retaining IROs with a score above the threshold of 10.

In conclusion, the materiality of an IRO will be determined if at least one of its scores (financial and/or impact) exceeds the threshold defined during the double materiality assessment.

1.4.2. STANDARDS COVERED BY MATERIAL ISSUES [DR IRO 2]

Summary of the ESRS topics covered in the report, as they are considered material [DP 56]

Topics	Subtopics	Sub-sub-topics
E1 – Climate change	• Climate change adaptation	
	• Climate change mitigation	
	• Energy	
E5 – Circular economy	• Resources inflows	
	• Resources outflows	
	• Waste	
S1 – Own workforce	• Equal treatment opportunities for all	• Gender Equality
		• Training and skills development
		• Employment and inclusion of persons with disabilities
	• Other work – related rights	• Diversity
		• Human Rights
		• Privacy (personal data)
• Working conditions	• Secure employment	
	• Adequate wages	
	• Collective Bargaining	
	• Work-life balance	
S2 – Workers in the value chain	• Other work – related rights	• Human Rights
	• Working conditions	• Health & Safety
S4 – Consumers and end users	• Information – related impacts for consumers and/or end- users	• Privacy/cyber-security
	• Social inclusion of consumers and/or end- users	• Responsible marketing practices
		• Access to products and services

Topics	Subtopics	Sub-sub-topics
G1 – Business conduct	• Corporate culture	
G1 – Business conduct	• Management of relationships with suppliers including payment practices	

The issues that emerged as **non-material** following the double materiality analysis are presented in the following matrix:

N°	ESRS – « Theme »
E2	Pollution
E3	Water
E4	Biodiversity and ecosystems
S3	Affected communities

2. Climate change [ESRS E1]

2.1. Climate change-related remuneration criteria [DR GOV 3]

[DP 13]

The remuneration criteria for certain members of decision-making and supervisory bodies are described in the data point [DP 29a] from section GOV3 of the General Information Standard. These criteria are linked to the following objectives:

- an increase in the Ecovadis rating to reach Platinum in 2028;
- implementation of action plans to achieve the objectives validated by SBTi (which will be described in the [DP 16a & 16g] of the transition plan of section E1-1.

2.2. Transition plan [E1-1]

[DP 14]

Econocom's transition measures began in 2018 and were implemented through the decarbonisation plan validated by SBTi in 2024. In particular, we developed drivers for reducing emissions for the group's activities (these measures will be described in the Actions and Resources section of the standard (E1-4).

[DP-16a & 16g]

To **combat global warming**, Econocom has defined scientific objectives for reducing greenhouse gas emissions, validated by **SBTi** in June 2024

The Science-Based Targets Initiative (SBTi) is a partnership between the Carbon Disclosure Project (CDP), the United

Nations Global Compact, the World Resources Institute (WRI) and the World Wide Fund for Nature (WWF). It aims to accelerate action by the world's businesses and financial institutions to halve their emissions by 2030 and achieve net-zero emissions by 2050.

The science-based targets set the greenhouse gas emission reductions needed to limit global warming to 2°C, or even 1.5°C, in line with the Paris Agreement.

Thus, the three official commitments of the Group are as follows:

- Econocom has committed to **reduce scope 1 and 2 GHG emissions by 61.4% by 2028 compared to the 2018 reference year (i.e. an average reduction of 6% per year);**
- Econocom has committed to increase **annual renewable electricity supply from 5% in 2018 to 92% by 2028;**
- Econocom has also committed to ensure that **100% of its suppliers, with regard to emissions linked to the purchase of goods and services, have SBTi targets by 2028.**

NB: In 2024, the group intends to improve the identification analysis of its SBTi suppliers:

- The identification of suppliers was carried out on the basis of the group's IT product and service purchases (i.e. more than 80% of total purchases):
 - ▶ on the one hand, emissions from purchases of goods and services (category 3.1 of scope 3 of the carbon footprint) represent more than 75% of total emissions generated by purchases.

- ▶ On the other hand, non-IT purchases represent too heterogeneous a population to be analysed in a coherent manner.
- There are two possible approaches:
 - ▶ The first highlights the proportion of IT purchases made from SBTi suppliers in the group's total purchases.
 - ▶ The second highlights the proportion of IT purchases made from SBTi suppliers and the proportion of purchases that have been identified by the group. Indeed, this second approach is important to identify the proportion of IT purchases whose suppliers have not yet been identified. This amounted to **33%** in 2024.

SBTi commitment tables

Target wording	Public	Base year	Most recent year	Target year	Type	Target value	Method used
Econocom commits to reduce absolute scope 1 and 2 GHG emissions 61.4% by 2028 from a 2018 base year.	Yes	2018	2022	2028	Absolute	61.4%	Absolute contraction
Econocom also commits to increase annual sourcing of renewable electricity from 5% to 92% by 2028.	Yes	2018	2022	2028	D	92.0%	Renewable electricity procurement
Econocom further commits that 100% of its suppliers of purchased goods and services, will have science-based targets by 2028.	Yes	2022	2022	2028	Commitment	100.0%	Supplier engagement

[\[DP 16b\]](#)

In section E1-3 of DP 28, we disclose all the decarbonisation drivers identified, the key actions planned for this and the measures to reduce our carbon emissions.

[\[DP 16c\]](#)

The main costs for the Econocom group and its subsidiaries result from reaching our SBTi objectives on our scopes 1 and 2 and more specifically our commitments to increase the **annual supply of renewable electricity and increase the proportion of hybrid and electric vehicles in our overall fleet.**

- The transition from non-renewable energy to low-carbon and/or renewable energy involves a change in the energy contracts of subsidiaries, which can represent a significant cost depending on their size, structure and the type of activity in which they operate.
- Similarly, replacing the remaining fleet of non-rechargeable thermal or hybrid vehicles with electric and/or rechargeable hybrid vehicles will have an additional cost depending on the subsidiaries.

At this stage, we have not yet carried out quantitative studies on the investment costs that Econocom will have to face for these adaptations.

[\[DP 16d\]](#)

Econocom, through its main activities of supply and leasing of IT equipment, does not have to deal with so-called potentially “locked-in” emissions.

These are often emissions from assets that are difficult to decarbonise because they are very carbon-intensive, and with very little leeway for reducing their associated emissions.

[\[DP -16e\]](#)

The European “Green Taxonomy” regulation allows a company to highlight its proportion of revenue, investments and operational costs associated with the six pillars of the Taxonomy.

The eligible activities presented in the following list meet the following three alignment criteria:

- “Significant positive contribution” criteria;
- “Do Not Significantly Harm” criteria;
- “Minimum Safeguards” criterion.

Aligned activities:

- 8.1: Data processing and hosting and related activities;
- 9.3: Specialist services in the energy performance of buildings;
- 6.5: Purchase, financing, leasing, leasing and operation of vehicles;
- 7.7: Acquisition and ownership of buildings;
- 4.1: Provision of data-driven IT/OT solutions;

- 5.1: Repair, refurbishment and reconditioning;
- 5.3: Preparation for the reuse of end-of-life products and their components;
- 5.5: Product-as-a-Service and other circular service models focused on use and results;
- 5.6: Marketplace for selling second-hand goods intended for reuse.

Full details of the alignment are explained in the group taxonomy regulations (**part 8 of the sustainability report**).

[\[DP 16h\]](#)

We have explained in general terms the group’s business model and strategy in accordance with **the general disclosure** standard (see section SBM1 of ESRS 2) and how Econocom has successfully incorporated sustainability issues into its model and strategy (see double materiality matrix on climate change – DP 49 of ESRS 2).

More specifically, Econocom incorporates climate change issues into its strategic plan, which runs from 2024 to 2028 and combines financial growth issues and extra-financial issues. The validation of these objectives by SBTi⁽¹⁾, the reduction of scope 1 & 2 emissions, as well as the ambitious objectives set out in scope 3, demonstrate the group’s genuine commitment to climate change.

[\[DP-16j\]](#)

The transition plan that was adopted by the various decision-making bodies of the group such as the Executive Committee is part of the “One econocom” strategic plan.

(1) Econocom’s specific objectives for its transition plan, particularly those relating to SBTi, will be described in DR E1 4.

[DP-16j]

Econocom produces two carbon assessments. A carbon assessment is established exclusively from monetary data. It has the advantage of reporting data from the reporting year, i.e. 2024. A carbon assessment is established with the assistance of an independent third party, Greenly, partly from physical data for the most contributing sections of the assessment (consumption, etc.) and partly from monetary data for the least contributing sections of the assessment. The 2023 monetary carbon assessment and the Greenly carbon assessment will allow us to highlight the progress of the objectives linked to the group's transition plan by comparing it (on a like-for-like basis when necessary) to the 2024 carbon assessment estimated by the group. The details of the emissions and their monitoring, as well as their analysis within the framework of the application of the transition plan will be detailed according to the various data points of DR E1-5 (monitoring of energy mix changes at the group level) and in DR E1-6 (monitoring of emissions from the different scopes and therefore with the different SBTi objectives). We will present both the overall emissions according to the GHG Protocol methodology and the different assumptions and scope considered for each scenario analysed.

2.3. Context: impacts, risks and opportunities [ESRS 2 SBM 3 & ESRS 2 IRO 1]

The important sustainability issues in climate change are those described in our double materiality analysis below.

The risks, impacts and opportunities in terms of both climate change mitigation and adaptation are intrinsically linked.

2.3.1. CLIMATE CHANGE MITIGATION

Econocom's activities – its own and those of the activities at both ends of the value chain, have a negative impact on the environment because these activities emit greenhouse gases which contribute to global warming.

2.3.2. ADAPTATION TO CLIMATE CHANGE (STRENGTHENING ENVIRONMENTAL REGULATIONS AND RESILIENCE OF SUPPLY CHAINS).

[DP 18]

The significant risks with respect to climate change identified by Econocom in its double materiality analysis are as follows:

- Risks associated with the “Resilience of supply chains” issue
 - ▶ price volatility: transition risks,
 - ▶ potential shortage of materials, supply interruptions: transition risks,
 - ▶ damage to reputation: transition risks,
 - ▶ revenue growth constraint and/or high cost of capital: transition risks;
- Risks associated with the issue of “Strengthening environmental regulations on the impact of digital technology”
 - ▶ reducing the impact on the environment through regulatory supervision: transition risks,
 - ▶ risks associated with the issue of “Strengthening environmental regulations on the life cycle of products”,
 - ▶ additional costs: transition risks.

[\[DP 19a 19b 19c\]](#)

The group believes that its strategy and business model are sufficiently resilient to climate change in view of the various risks identified: the group's activities will not change significantly according to the various scenarios.

[\[DP 20a – DP 20c ; DP 21\]](#)

The process of identifying and assessing climate change impacts, risks and opportunities is identical to the process for all other sustainability issues studied. In addition, the description of impacts, risks and opportunities are described in the ESRS 2 materiality matrix.

2.4. Climate change mitigation and adaptation policies [DR E1 2]

[\[DP-24 ; DP-25a ; DP-25b ; DP-25c ; DP-25d\]](#)

The Econocom group applies a structured and ambitious policy in all the major countries where it is present in order to address the challenges developed in its strategy in the fight against climate change.

This policy is divided into two main areas: **Mitigation** and **Adaptation** to climate change.

2.4.1. POLICIES RELATED TO THE MANAGEMENT OF IROS RELATING TO CLIMATE CHANGE MITIGATION

Reduce and limit the impact of the group (France + International) in terms of carbon emissions on these three scopes:

- reduce its direct carbon footprint (in accordance with the SBTi strategy set out in the transition plan section:
 - ▶ reduce its scope 1 & 2 emissions,
 - ▶ increase the use of renewable or low-carbon energy (provide electricity with a greater proportion of renewable and low-carbon);
- Group commitment with regard to its scope 3 (its value chain):
 - ▶ aware of its impact on its value chain, the group decided to make realistic, appropriate commitments in its scope 3,
 - ▶ therefore, rather than committing to a quantified reduction plan (an ambitious objective, considering the group's intermediary position in its value chain), Econocom has instead committed to ensure that its emissions from purchases of goods and services (which represented 81% of its scope 3 in 2023) depend 100% on suppliers who have launched concrete decarbonisation measures validated by SBTi;
- **improve energy efficiency and reduce digital consumption for our internal uses, as well as for our customers:**
 - ▶ offer less energy-intensive digital services,
 - ▶ develop green customer offers,
 - ▶ communicate and promote these approaches to its partners.

2.4.2. POLICIES ON MANAGEMENT OF IROS RELATING TO ADAPTATION TO CLIMATE CHANGE

Measuring carbon footprint to comply with new emissions accounting regulations

- continuous improvement of the measurement of the group's carbon footprint:
 - ▶ carbon footprint assessment with a Greenly service provider for the previous year allowing us to incorporate part of the physical analysis into our carbon footprint calculations in accordance with the GHG Protocol (see the physical carbon footprint presented in E1-6),
 - ▶ carbon footprint assessment carried out via a monetary approach (GHG Protocol type) calculated by the group only for the current year to meet the needs of CSRD regulations (see the carbon footprint presented in E1-6);

Group's adaptation measures with respect to its value chain:

In order to address the supply chain resilience risks described in the ESRS 2 materiality matrix, we explain that our policies on climate change mitigation also serve our policies on our adaptation to climate change (example of the commitment to our value chain), as the group's commitment with regard to its scope 3, as explained above, addresses both areas of the Econocom group's policy.

2.5. Actions and resources for climate change policies [DR E1 3]

[DP 28 ; 29a & 29b]

All data points provided by the CSRD for this Disclosure Requirement are explained according to the two focuses of analysis on mitigation and adaptation to climate change.

2.5.1. ACTIONS AND RESOURCES FOR POLICIES WITH RESPECT TO CLIMATE CHANGE MITIGATION

Reduce and limit the impact of the group (France + international) in terms of carbon emissions on these three scopes:

Actions related to monitoring of the emissions reduction plan

- **Main objectives arising from the SBTi objectives:** These objectives have already been described in the [DP 16a 16g] of the ESRS E1-1 of the group transition plan..
- **Action plan :** A French and international action plan is in place to reduce Econocom's carbon emissions. It covers all sites, all sources of emissions from the group's operations and all scopes of GHG emissions.

In 2025, we plan to determine which suppliers (SBTi or not) the 33% of unidentified purchases relate to, as explained in the transition plan above to further clarify our objective for our scope 3.

- **Achievements to date:** Scopes 1 and 2 of the Econocom group have decreased significantly between 2018 and 2024. This trend is in line with the long-term objectives of the Econocom group (quantified description in DP 34 of DR E1 4).

The group currently knows **66%** of its suppliers in the IT purchasing scope.

Switching to renewable energy

- **Main objectives:** the Econocom group's medium-term ambition is to consume 100% renewable and carbon-free electricity. The intermediate objectives for the coming years (as a percentage of total electricity consumption) are as follows: 92% in 2028, 100% in 2030.
- **Action plans:** the group is continuing its gradual transition to low-carbon/renewable energies; it has action plans in each geographic area it operates in.
- **Achievements to date:** in 2024, the electricity consumed by Econocom from renewable energy sources was broken down as follows:
 - The scope of this information concerns all locations where we pay directly for electricity (more than 90% of our sites).

Drawing up an energy saving plan

- **Main objectives:** to address energy challenges, Econocom has taken action to reduce energy consumption in France and internationally by 10% over two years.
- **Action plans:** as a responsible digital entrepreneur, Econocom has created an energy saving plan whereby we pledge to:
 - ▶ reduce the temperature of our premises to 19°C,

- ▶ turn off indoor lighting in buildings from 9 p.m. to 6 a.m. and on weekends,
- ▶ turn off outdoor illuminated signs on buildings from midnight to 5 a.m.,
- ▶ put our buildings into frost protection mode and completely shut down air conditioning at night and on weekends,
- ▶ continue the installation of low voltage lighting (LED) and motion-sensor systems.

Decarbonising the Econocom group's automobile fleet

- **Main objectives:** the Econocom group aims to switch its entire vehicle fleet to electric or hybrid vehicles by 2028.
- **Action plans:** in 2024, Econocom continued its green mobility programme to switch to a fleet of electric/hybrid vehicles. The group also favours low-polluting means of transport and encourages its employees to take the train. Regarding air travel, Econocom works, as much as possible, with companies committed to reducing their carbon footprint.
- **Achievements to date:** at the end of 2024, the percentage of electric/hybrid vehicles is **48%** for the Econocom group (compared to 25% in 2023, an increase of 23.4 points in one year).

Vehicle fleet	2024
Percentage of electric vehicles	20.5%
Percentage of hybrid vehicles	27.8%

Improve energy efficiency and reduce digital consumption for our internal uses and for our customers:

For our internal uses:

- **Main objectives:** measure and reduce the impact of our digital consumption. Since 2017, the Econocom group has been assessing and analysing the carbon footprint of its digital operations. First on the usage phase (energy), and since 2020 by conducting an analysis of the manufacturing and end-of-cycle phases, to have a complete analysis of the life cycle of digital equipment;
- **Action plan:** Reduce your bill and optimise your energy efficiency: The group has implemented a number of measures and has managed to significantly reduce its digital energy consumption. The study carried out for 2024 offers a group view and an examination of the group's situation. It is based on two main chapters: the measurement of the historical phase of use (energy), to assess the application of the latest recommendations and their effects, and the increasingly comprehensive analysis of the manufacturing and end-of-cycle phases, allowing the first comparisons to be made with previous years.

The main reduction measures in 2024:

USE

- reduction in electricity consumption > Measures taken on infrastructures: reduction in the consumption of data centre racks, new less energy-intensive equipment and number of servers halved in the data centre, optimisation of network equipment in the offices. The Econocom group has also renewed and **streamlined the equipment** > MFP (multifunction printer), in class A and infrastructure equipment (DC).

MANUFACTURING

- **CO² saved** > Extension of equipment usage beyond the original lifespan (more impacts observed);
- **Achievements to date:**

Econocom has reduced its digital energy consumption for the **eighth consecutive year**, dividing it by more than 3.8 since 2017. This decrease is due mainly to the combination of several new **green IT measures** implemented in 2024, in addition to those in previous years. In 2025, Econocom is continuing its efforts to reduce its digital carbon footprint by implementing recommendations from the previous year.

Environmental impact of digital technology (Green IT)

2024 ⁽¹⁾

Energy footprint of digital technology	3,131,177 kWh
--	---------------

(1) In 2023 the digital carbon footprint was 3,465,888 Kw. The group thus reduced its consumption by 10% between 2023 and 2024.

For our customers

- **Main objectives:** we help our customers with effective solutions to the common challenge of reducing the environmental impact of business operations. By sharing our experience, knowledge and ambitions, we demonstrate our commitment to a circular economy;
- **Action plans:** Econocom's aim is to incorporate a responsible component into 100% of its new and existing offers from the outset. The idea is to create new-generation support offers that address both new uses (autonomy, user experience) and cost control – an imperative for IT departments. Econocom is therefore trying to provide its customers with solutions for transforming the work environment (physical and digital) and associated infrastructures in order to:
 - ▶ Increase user satisfaction,
 - ▶ Strengthen productivity,
 - ▶ While fulfilling the responsible dimension of its range of offers.

The objectives of businesses and communities in the energy transition are identical, i.e.:

- reduce the energy consumption of their buildings;
- contribute to the reduction of GHGs;
- innovate for better overall energy control;
- participate in the production of renewable energies.
- **Achievements to date:** the Econocom group has already developed several offers with a positive impact such as (non-exhaustive list, see chapter on offers in the impact report):
 - ▶ EcoCarbon,
 - ▶ Product Care,
 - ▶ EcoBuilding,
 - ▶ E-bike,
 - ▶ Finops,
 - ▶ Workplace as a service,
 - ▶ Ecotwice,
 - ▶ Ecoswitch.

Below are **the indicators** for monitoring the responsible digital policy:

Responsible digital and customer offer:	2024
Number of commercial offers for responsible digital technology ⁽¹⁾	11

(1) Our commercial offers for responsible digital technology, green IT and the circular economy: Productcare, EcoCarbon, EASI, Ecotwice, EcoSwitch Workplace as a service, Hubreg, Finops, e-POS Services, e-bike, Ecobox (recovery of electronic waste with Ecologic and Paprec).

Consolidated revenue from impact offers

Impact offers (in € millions)	2024	%
Income from impact offers	507 ⁽¹⁾	18.5

(1) Estimated amount.

Including revenue from second-hand goods

Second-hand (in € millions)	2024	%
Income from second-hand goods	234	8.6

2.5.2. ACTIONS AND RESOURCES FOR CLIMATE CHANGE ADAPTATION MEASURES

Measuring carbon footprint to comply with new emissions accounting regulations

- **Main objectives:**

- ▶ measure and report all emissions generated by Econocom's activities, in accordance with the GHG Protocol's corporate reporting standards, covering scopes 1 and 2 and all relevant subcategories of scope 3, working with an external service provider, Greenly,
- ▶ measure an estimate of our own carbon footprint for the current year for better monitoring of our emissions (the carbon footprint calculated by Greenly is based on the previous year);

- **Action plans:**

- ▶ to measure Econocom's direct emissions, specific key performance indicators are collected each year on a global scale in more than 25 entities worldwide, which represent a significant proportion of revenue (95%), and purchases (96%). The Greenly digital platform is connected to all the company's software to retrieve live data to quantify activities and, from there,

calculate the carbon footprint. This makes it possible to analyse the company's expenses and understand where the major CO2 emission sources are. The platform takes into account the specific emissions of each activity (all assumptions and exceptions will be described in DR E1 6 of the standard),

- ▶ we developed a Tagetik reporting tool and industrialised the reporting of information relating to our carbon emissions for the current year. We are consolidating all the group's subsidiaries (all assumptions and exceptions will be described in DR E1 6 of the standard);

- **Achievements to date:**

- ▶ The carbon footprint calculated by Greenly includes exhaustive analyses of monetary emission factors, as well as the introduction of physical analyses and physical emission factors. In 2022, we reached 18% physical analysis (only on the supply business in France). In 2023, we progressed by 30 percentage points to reach **48% physical analysis on the group**,
- ▶ The carbon footprint calculated by Econocom over the year is monetary for scope 3 only and is based on a physical analysis similar to the one conducted by Greenly for scope 1 & 2.

2.6. Targets set for climate change measures [DR E1 4]

[DP 34a ; 34b ; 34c ; 34e]

2.6.1. CLIMATE CHANGE MITIGATION GOALS AND TARGETS

The numbers are expressed in TC02eq:	Base year		Target
	2018	2024	2028
Scope 1	10,724	4,562	4,670
Scope 2 (market-based)	2,412	790	450
Total	13,136	5,352	5,120

[DP 34f]

Standard action plans for 2024

Fleet Action Plan	France	Belgium	Spain	Italy	Netherlands	Germany
Hybrid	28%	0%	13%	41%	18%	68%
Electric	21%	41%	2%	0%	29%	18%
Total number	1,121	346	264	232	141	28

Electricity Action Plan	France	Belgium	Spain	Italy	Netherlands	Germany
% green electricity	96%	44%	93%	34%	27%	75%
% solar panel	0%	5%	0%	0%	2%	0%
Gas	0%	35%	0%	0%	9%	0%

We detail the targets established for 2028 (based on 2023):

Fleet Action Plan ⁽¹⁾	France	Belgium	Spain	Italy	Netherlands	Germany
Hybrid	0%	0%	30%	45%	15%	29%
Electric	96%	63%	7%	5%	70%	35%
Total number	874	383	174	225	141	17

(1) The 2028 figures are estimates and will be adjusted from year to year.

Electricity Action Plan	France	Belgium	Spain	Italy	Netherlands	Germany
% green electricity	100%	100%	100%	100%	90%	70%
% solar panel	0%	40%	30%	28%	0%	0%
Gas	0%	15%	0%	0%	79%	0%

Supplier engagement is explained in the actions at E1 – 3.

Supplier Commitment	2024	2028
Supplier engagement – Scope 3 (incl. proportion of unidentified suppliers)	48.5%	100%
IT Supplier Engagement - Scope 3 (suppliers identified by the group)	72.8%	100%

2.6.2. CLIMATE CHANGE GOALS AND TARGETS

The measures for adapting to climate change consist of developing more reliable, precise carbon footprint assessments that comply with the various European regulations. Econocom has set up an

internal tool, Tagetik, that can provide a group-wide estimate of the carbon footprint. In addition, Econocom has extended its physical analysis in its 2023 carbon footprint calculated by Greenly. Both carbon footprints comply with the GHG Protocol and the CSRD directive and will be introduced in AR 48 of E1-6.

2.7. Energy consumption and energy mix [DR E1-5]

[DP 37-a ; DP-b ; DP-c]

Econocom's consumption data and energy mix are presented below:

Categories	Unit	2024
Total non-renewable energy consumption	MWh	23,793
<i>Proportion of non-renewable sources in total energy consumption</i>	%	72
Total renewable energy consumption	MWh	9,098
<i>Proportion of renewable sources in total energy consumption</i>	%	28
Total energy consumption	MWh	32,891

2.8. Carbon footprint, gross GHG emissions from scopes 1, 2, 3 [DR E1 6]

[DP 34; DP-34a – DP 34c]

2.8.1. GENERAL INFORMATION AND CONSOLIDATION SCOPES

General information:

The carbon footprint assessment gives an overview at a given time of the greenhouse gas emissions (here we will focus on carbon dioxide emissions; CO₂) released by a company through **its own activities** and through its **business and business relations**. These emissions can be categorised as follows:

- **scope 1 :**
 - ▶ these emissions correspond to the direct emissions that a company produces through its activity;
- **scope 2 :**
 - ▶ These emissions correspond to emissions from the consumption of electricity purchased by the company. There are two approaches to calculating its emissions:
 - ▶ the location-based scope 2 method: this method calculates a company's scope 2 emissions using **national emission factors** (average of national energy mixes),
 - ▶ Market-based Scope 2 method: This method calculates Scope 2 emissions using supplier emission factors. It is therefore based on **the electricity**

supply contracts for companies. This method highlights the use of market instruments (e.g. contracts with 100% green electricity supplied) to achieve a reduction in emissions;

- scope 1 and 2 together represent **on average** (regardless of the assessment considered) **only 1% of the group's emissions;**
- **scope 3 :**
 - ▶ These emissions correspond to emissions generated by the company's value chain (upstream and downstream). They show the company's indirect emissions,
 - ▶ Econocom's scope 3 represents **on average** (regardless of the assessment considered) **99% of the group's emissions.**

In this section we will present the assumptions made by the group for calculating our emissions both on the carbon footprint only with monetary emission factors, and on the carbon footprint calculated by our service provider Greenly which combines monetary factors and physical factors.

The difference in use between the physical approach and the monetary approach lies in the methodology for calculating emissions from the company's value chain: Scope 3.

We specify that the carbon footprint calculated by Greenly is carried out over the past year, i.e. 2023, while the monetary carbon footprint is calculated over the current year, i.e. 2024.

Data consolidation scopes :

- **Scope of the Greenly carbon footprint assessment:**

- ▶ The Greenly carbon footprint analysis was calculated across all 25 subsidiaries of the Econocom group,
- ▶ The consolidation of data was considered relevant because these 25 subsidiaries account for 95% of the purchases made by the group,
- ▶ moreover, the "purchases" data is essential in the calculation of Econocom's scope 3 and these associated emissions account for almost 88.6% of scope 3 (see the report presented in part 2.1.8.4);
- ▶ scope of analysis of the monetary carbon footprint:
 - ▶ The carbon footprint was calculated for all so-called continuing subsidiaries. They account for more than 95% of Econocom's revenue,
 - ▶ the remaining subsidiaries intended for sale or disposal have been approximated based on their revenue and activity, in relation to a carbon footprint which will serve as a comparison. A discontinued Service subsidiary will be estimated according to its revenue and in relation to the service carbon footprint of a similar entity.

2.8.2. CALCULATION OF SCOPE 1 AND 2 EMISSIONS

The calculation of scope 1 and scope 2 could be carried out via a physical approach, both for the carbon footprint assessment carried out by Greenly and the one conducted by the group. We collected physical consumption data, for example:

- for fuel consumption (the main source of emissions in scope 1; on average this represents 91% of scope 1). The data collected are in litres ⁽¹⁾;
- for electricity consumption of buildings (main source of emissions in scope 2; on average this represents 98% of scope 2). The data collected are in KWh ⁽²⁾.

The emissions calculated were expressed as a % which is considered as **the own use** of the energy source. It corresponds on average to 82% for scope 1 and 68% for scope 2. The remainder is considered as the manufacturing proportion and is outsourced in scope 3 in category 3.3 (see scope 3 allocation table below).

(1) Emission factors for scope 1 vary depending on the nature of the fuel

(2) Emission factors for scope 2 vary according to geographical area (for calculation with the location-based method) or with suppliers' energy mixes (for the market-based method).

The assumptions for the breakdown of scope 1 & 2 are shown in the table below:

Scope 1&2

	Greenly	=	Econocom
Scope 1	Production of electricity, heat or steam	=	Natural gas consumption, direct electricity consumption, direct renewable energy consumption
	Transport of materials, products, waste and employees	=	Consumption of thermal vehicles and/or other thermal sources
	Fugitive emissions	=	Refrigerants
Scope 2	Electricity-related emissions (buildings plus vehicles)	=	Consumption of electricity, heat, steam and cold purchased or acquired from fossil sources
		=	Consumption of electricity, heat, steam and cold purchased or acquired from nuclear sources
		=	Consumption of electricity, heat, steam and cold purchased or acquired from renewable sources

2.8.3. CALCULATION OF SCOPE 3 EMISSIONS

The assumptions for the scope 3 breakdown are presented in the table below:

Scope 3

	Greenly		Econocom
3.1	Purchases of goods and services	We used LCAs and Emission Factors (EF) for some entities based on the product purchase list that Econocom provides to Greenly. For others, we used the Accounting Entry File; if the FEC was not available, a generic EF (0.4 for IT products).	Calculated using data collection during the year in Tagetik on purchases of goods and services. Then we distribute the amounts for the next category according to an allocation table calculated on the basis of the Greenly 2023 footprint analysis. We can distribute the calculated data across the entire scope 3 since we use monetary emission factors from ADÈME
3.2	Capitalised assets	Data located in the FEC	Calculated using data collection during the year in Tagetik on purchases of goods and services. Then we distribute the amounts for the next category according to an allocation table calculated on the basis of the Greenly 2023 footprint analysis. We can distribute the calculated data across the entire scope 3 since we use monetary emission factors from ADÈME
3.3	Upstream energy (scope 1 and 2)	Supply keys used on gross amounts of scope 1 and 2 (resp. 17.9% and 32.1%)	Supply keys used on gross amounts of scope 1 and 2 (resp. 17.9% and 32.1%)

		Greenly	Econocom
3.4	Upstream transport and supply	Small percentage of emissions (downstream transport emissions are included in this figure). The rest of the emissions are included in category 3.1.	Calculated using data collection during the year in Tagetik on purchases of goods and services. Then we distribute the amounts for the next category according to an allocation table calculated on the basis of the Greenly 2023 footprint analysis. We can distribute the calculated data across the entire scope 3 since we use monetary emission factors from ADÈME
3.5	Waste generated during operations	Calculated based on available life cycle analyses. If there were no LCAs, sectoral estimates were used.	Calculated using data collection during the year in Tagetik on purchases of goods and services. Then we distribute the amounts for the next category according to an allocation table calculated on the basis of the Greenly 2023 footprint analysis. We can distribute the calculated data across the entire scope 3 since we use monetary emission factors from ADÈME
3.6	Business trips	Calculated via FEC	Calculated using data collection during the year in the Tagetik tool
3.7	Employee travel	Calculated based on the number of employees and average consumption in kgCO ₂ .	Calculated based on the number of employees and average consumption in kgCO ₂ .
3.8	Upstream leased assets	Calculated via FEC	Calculated using data collection during the year in Tagetik on purchases of goods and services. Then we distribute the amounts for the next category according to an allocation table calculated on the basis of the Greenly 2023 footprint analysis. We can distribute the calculated data across the entire scope 3 since we use monetary emission factors from ADÈME
3.9	Downstream transport and supply	See 3.4	See 3.4
3.10	Transformation of products sold	Calculated based on ratios related to LCAs and represents a minimal part of scope 3.	Calculated using data collection during the year in Tagetik on purchases of goods and services. Then we distribute the amounts for the next category according to an allocation table calculated on the basis of the Greenly 2023 footprint analysis. We can distribute the calculated data across the entire scope 3 since we use monetary emission factors from ADÈME

		Greenly	Econocom
3.11	Use of products sold	<p>Key assumption: Goods purchased = goods sold (distributed)</p> <p>For TMF: we consider a period of use of one year.</p> <p>For P&S: we take the entire lifetime. Using ACV when available, otherwise model, otherwise brand, then generic EF in all other cases.</p>	<p>Calculated using data collection during the year in Tagetik on purchases of goods and services.</p> <p>Then we distribute the amounts for the next category according to an allocation table calculated on the basis of the Greenly 2023 footprint analysis. We can distribute the calculated data across the entire scope 3 since we use monetary emission factors from ADÈME</p>
3.12	Treatment of end-of-life products	<p>Calculated based on ratios related to LCAs and represents a minimal part of scope 3.</p>	<p>Calculated using data collection during the year in Tagetik on purchases of goods and services.</p> <p>Then we distribute the amounts for the next category according to an allocation table calculated on the basis of the Greenly 2023 footprint analysis. We can distribute the calculated data across the entire scope 3 since we use monetary emission factors from ADÈME</p>
3.13	Downstream leased assets	<p>This category corresponds to the use of products leased to customers</p>	<p>Calculated using data collection during the year in Tagetik on purchases of goods and services.</p> <p>Then we distribute the amounts for the next category according to an allocation table calculated on the basis of the Greenly 2023 footprint analysis. We can distribute the calculated data across the entire scope 3 since we use monetary emission factors from ADÈME</p>
3.14	Franchises	N/A	N/A
3.15	Investments	N/A	N/A

LCA: Lifecycle Analysis
EF: Emission factor

2.8.4. GROUP CARBON FOOTPRINT

[DP 47 - DP 52b]

The first carbon assessment is the one carried out via a monetary approach by the group in 2024.

Carbon footprint n°1

GHG Emissions	Unit	2024
Scope 1 / Scope 2		
Gross Scope 1 emissions	kgCO ₂ e	4,561,681
Gross Scope 2 emissions (location based)	kgCO ₂ e	1,209,557
Gross Scope 2 emissions (market based)	kgCO ₂ e	790,246
Total gross emissions (location based)	kgCO₂e	5,771,239
Total gross emissions (market based)	kgCO₂e	5,351,927

GHG Emissions	Unit	2024
Scope 3		
Purchased goods and services	kgCO ₂ e	712,813,701
Capital goods	kgCO ₂ e	6,047,835
Fuel and energy-related activities (not included in Scope 1 or Scope 2)/ location-based method	kgCO ₂ e	1,533,154
Fuel and energy-related activities (not included in Scope 1 or Scope 2)/ market-based method	kgCO ₂ e	373,592
Upstream transport and supply	kgCO ₂ e	796,083
Waste generated in operations	kgCO ₂ e	5,363,304
Business travel	kgCO ₂ e	2,983,567
Employee commuting	kgCO ₂ e	2,149,980
Upstream leased assets	kgCO ₂ e	6,405,134
Downstream transport	kgCO ₂ e	5,257,972
Processing of sold products	kgCO ₂ e	4,097
Use of sold products	kgCO ₂ e	41,723,757
End-of-life treatment of sold products	kgCO ₂ e	9,631,888
Downstream leased assets	kgCO ₂ e	10,744,168
Franchises	kgCO ₂ e	0
Investments	kgCO ₂ e	0
% Physical inventory	%	0%
Total of Scope 3 emissions/location-based method	kgCO₂e	805,454,642
Total of Scope 3 emissions/market-based method	kgCO₂e	804,295,079
Total Gross GHG Emissions		
Gross Scope 1 emissions	kgCO ₂ e	4,561,681
Gross Scope 2 emissions (Location-based)	kgCO ₂ e	1,209,557
Gross Scope 2 emissions (Market-based)	kgCO ₂ e	790,246
Total of Scope 3 emissions Location-based method	kgCO ₂ e	805,454,642
Total of Scope 3 emissions Market-based method	kgCO ₂ e	804,295,079
Total GHG Emissions of IFRS 5 activities (estimated)	kgCO ₂ e	12,406,886
Total GHG emissions/Location-based market	kgCO₂e	823,632,766
Total GHG emissions/Market-based method	kgCO₂e	822,053,892

[DP 53]

The following two ratios highlight the carbon intensity (CI) per thousand euros of revenue recorded:

CI_{location-based method} = 300.16 kgCO₂/K€

CI_{market-based method} = 299.59 kgCO₂/K€

Revenue is the one reported in the consolidated financial statements: €2,743,956,000.

The second carbon footprint is the one carried out via a physical approach

Carbon footprint n°2

GHG Emissions	Unit	2023
Scope 1 / Scope 2		
Gross Scope 1 emissions	kgCO ₂ e	4,959,318
Gross Scope 2 emissions (Market-based)	kgCO ₂ e	535,640
Total gross emissions (Market-based)	kgCO₂e	5,494,958
Scope 3		
Purchased goods and services	kgCO ₂ e	718,839,563
Capital goods	kgCO ₂ e	3,664,801
Fuel and energy-related Activities (not included in Scope 1 or Scope 2) Market-based method	kgCO ₂ e	1,355,024
Upstream transportation and supply	kgCO ₂ e	3,568,972
Waste generated in operations	kgCO ₂ e	395,320
Business travel	kgCO ₂ e	3,516,875
Employee commuting	kgCO ₂ e	1,734,339
Upstream leased assets	kgCO ₂ e	4,749,769
Downstream transport	kgCO ₂ e	0
Processing of sold products	kgCO ₂ e	18,524
Use of sold products	kgCO ₂ e	58,547,658
End-of-life treatment of sold products	kgCO ₂ e	164,306
Downstream leased assets	kgCO ₂ e	15,558,194
Franchises	kgCO ₂ e	0
Investments	kgCO ₂ e	0
% Physical inventory	%	48%
Total of Scope 3 emissions/Market-based method	kgCO₂e	811,610,540
Total Gross GHG Emissions		
Gross Scope 1 emissions	kgCO ₂ e	4,959,318
Gross Scope 2 emissions (Market-based)	kgCO ₂ e	535,640
Total of Scope 3 emissions/Market-based method	kgCO₂e	811,610,540
Total GHG emissions/Market-based method	kgCO₂e	817,105,498

2.9. Carbon credits and method of eliminating GHG emissions [DR E1 7]

[DP 56a]

The group has no plans to absorb or store greenhouse gases.

[DP 56b]

The group has not financed any climate change mitigation projects outside its value chain through the purchase of carbon credits.

2.10. Internal carbon pricing [DR E1 8]

[DP 63a]

The company does not apply any internal carbon pricing mechanisms.

2.11. Expected financial effects of climate change [DR E1 9]

The group will gradually implement the new information requirements⁽¹⁾ on the measurement of expected financial effects following the first publication. Appendix C of ESRS 1 stipulates that a company subject to these DRs is exempt from reporting both quantitative and qualitative elements in the first year of compliance.

(1) In accordance with Annex C of ESRS 1 of the CSRD Directive – “the company may omit the information prescribed by ESRS E1-9 in the first year of preparation of its sustainability statement”.

3. Resource use and circular economy [ESRS E5]

3.1. Context: impacts, risks and opportunities [DR IRO 1]

[DP 11a & 11b]

The established process for the identification of material impacts, risks and opportunities associated with the use of resources and the circular economy is described in ESRS 2.

Two issues of the standard emerged as material for the Econocom group: the **incoming flows of resources** and **the outgoing flows of resources and the management of the waste** they generate.

The material issues identified as well as the associated impacts, risks and opportunities are as follows:

3.1.1. RESOURCES INFLOWS (INCLUDING RESOURCES USES)

The Econocom group tries to limit as much as possible the negative impact of the purchase of new products in terms of extracting new resources from nature. The main ways for limiting this impact are by promoting the circular economy (via its reconditioning subsidiary) and developing the functional economy (via its leasing and service activities).

3.1.2. RESOURCES OUTFLOWS (INCLUDING PRODUCTS, MATERIALS AND WASTE MANAGEMENT)

- The Econocom group is trying to limit as much as possible the negative impact of the products sold by the group in terms of waste generation at the end of their life.

- Risks/Opportunities associated with **reinforcing regulations** on the treatment and reduction of IT waste:

- ▶ risks: Increase in the costs of an operation, loss of attractiveness and market share, deterioration of image,
- ▶ opportunities: Attractiveness and value of assets, increased interest in assets, market share gains, competitive advantage;

- Risks/Opportunities associated with **electronic waste management**:

- ▶ risks: Costs associated with revaluation/ Impact on Reputation,
- ▶ opportunities: Long-term savings/New opportunities in certain markets.

3.2. Policies on resource use and the circular economy [DR E5 1]

[DP 14 ; 15a & 15b]

Since the group has very little transformation activity, the input resources are similar to the output resources. As a result, the policies for reducing the group's impact in terms of the extraction of new resources are similar to the policies for reducing the generation of end-of-life waste.

The group also believes that the response it can provide to the risks and opportunities identified involves the same policies as those aimed at reducing the negative impacts of its activity.

Econocom's strategic plan (see section SBM1 of ESRS 2) in connection with the circular economy.

Triple the number of recycled or reconditioned assets (by 2028):

- By increasing the proportion of recycled or reconditioned assets, the group delays the end of life of the product and therefore reduces the quantity of new resources used as it reduces the quantity of waste generated. The measures to achieve this are:
 - ▶ Increase in the capacity of annual volumes processed by its reconditioning subsidiary, by the leasing and supply activities (respectively TMF and P&S), of recycled or reconditioned assets,
 - ▶ Growth plans through the integration of reconditioning players in Europe,
 - ▶ Sustained growth in TMF activity with larger volumes to be reconditioned and recycled at the end of the contract,
 - ▶ Growth in sales and financing of reconditioned P&S and TMF assets among our customers, driven in particular by changes in regulations (e.g. AGECE law in France for the public sector).

Double the number of assets repaired in our repair centres (by 2028)

- As with reconditioning, by increasing repairs to equipment installed at its customers' premises, the Econocom group also delays the end of life of the product and therefore reduces the amount of new resources taken and the amount of waste generated. The actions to achieve this are:
 - ▶ Growth of P&S and TMF activities and extension of asset life,
 - ▶ Increased penetration of services in P&S and TMF "as-a-service" offerings,

- ▶ Opening and development by Econocom of new repair centres in Europe (Product Care),
- ▶ Diversification of manufacturer certifications allowing an increase in volumes processed.

It is important to specify that the scope covered by this standard and these policies is limited to purchases of IT equipment, which accounts for more than **75%** of the group's total purchases. This means that among the Econocom group's total purchases, we do not take into account purchases of services (13% of the group's total purchases), purchases of goods other than IT equipment purchased as part of our TMF activity because the typology of assets is too disparate and not comparable enough from one year to the next (19% of total purchases), and purchases of intangible goods such as licenses because, by nature, the principles of the circular economy cannot be applied to these items. Lastly, the total volume of purchases that we consider is **2,982,297** assets.

3.3. Measures and resources [DR E5 2]

[DP 19-20b – DP 20d]

Triple the number of recycled or reconditioned assets:

As part of our leasing or supply contracts, the group has two ways of recovering equipment for reconditioning:

- either by recovering the equipment leased to our customers at the end of the contract in order to resell it on the secondary market or to lease it to other customers.
- or by purchasing equipment from our P&S customers (for example, as part of an IT fleet replacement) to resell it internally or externally after reconditioning it.

It has two channels for reconditioning purchased assets at the end of their life: its subsidiary Econocom Factory and external reconditioning facilities.

Econocom Factory (internal)

We conduct a comprehensive audit of the equipment and classify it into two categories concerning asset recovery and waste treatment (CSRD metrics on the proportion of assets recovered and the treatment of waste electrical and electronic equipment; WEEE).

The valuation of the assets processed by Econocom Factory corresponds to 1/5 (i.e. **88,573** assets in 2024) of the assets which were reconditioned by the group in 2024. The remaining assets are sold to partners or re-leased to customers as explained below.

[\[DP 20e – DP 20f\]](#)

External resale and reconditioning

In addition to its own reconditioning subsidiary, Econocom recycles its goods and disposes of its waste with important partners in its value chain such as:

These assets which are sold to our partners below represent **415,997** of the total reconditioned assets.

- The goods to be reconditioned for reuse are mainly from the partners below:
 - ▶ **Recyclea,**
 - ▶ **Tech life,**
 - ▶ **ATF Gaia,**
 - ▶ **Ateliers Sans Frontières (ASF);**
- non-recovered waste (treatment according to WEEE standards) corresponds to a non-significant portion of the total waste which is outsourced via the following service provider:
 - ▶ Ecologic.

Double the number of assets repaired in our repair centres:

Product Care

This offer is entirely dedicated to the eco-responsible management of mobile equipment: telephones, tablets and laptops. Product Care ensures the maintenance of nearly a million terminals, of which it repairs nearly 25,000 per year.

This helps delay the obsolescence of devices that are better maintained, updated regularly and repaired if necessary. This approach perfectly fulfils our commitments as a responsible digital entrepreneur.

With more than 40 employees, the Product Care team is a multidisciplinary team that takes care of the administrative, logistical and technical management of the terminals with:

- repair workshops;
- a customer call centre (also reachable by email, chat and web platform);
- a logistics team;
- a project team (in charge of supervising after-sales service for customers).

To meet the needs of businesses, administrations and their employees, Product Care has a number of bespoke services including:

- warranty extension up to eight years;
- fault management;
- collection of devices (including from home);
- temporary or permanent replacement device;
- repair (with or without a fixed timeframe commitment);
- insurance (zero deductible); and
- user support.

OneCare

Econocom Belux has created the OneCare repair portal and extended the repurchase services for used ICT assets to customers of our supply entities. Econocom Belux is thus recognised among the leading players in the Belux market for extending the life cycle of goods and purchasing used IT equipment.

3.4. Objectives [DR E5 3]

[DP 23] [DP 24a- DP24d]

The various targets established within the framework of Econocom's strategy in terms of circular economy and use of resources are described below:

Triple the number of recycled or reconditioned assets:

	2024	2028
Total number of refurbished IT equipment	504,570	1,500,000

Double the number of assets repaired in our repair centres:

	2024	2028
Number of computer equipment repaired	1,300,000	1,750,000

[DP 24e]

Waste production for the group is estimated at around **6%** ⁽¹⁾ of assets that leave the company, consequently, have no defined targets in this area.

[DP 27]

Information in terms of policies, actions and targets set with respect to the use of

resources from the circular economy or the recovery (via reconditioning and repair) of used assets was published by Econocom well before the advent of regulatory requirements (such as the CSRD, for example).

These targets were included in the "One econocom" strategic plan in 2023.

(1) The figure for the proportion of waste that will be treated as WEEE has been estimated based on data provided by our external partners, as well as by Econocom Factory. This share is not significant for Econocom. However, we have collected as much data as possible to make this estimate. It should be noted that waste is the direct responsibility of our external partners, which justifies the difficulties in consolidating this data at group level.

3.5. Incoming resources [DR E5 4]

[DP 30]

We have three types of incoming resources from the circular economy:

	2024
Econocom Factory purchases (in €M)	43,873
Total purchases of IT equipment (excluding service activity) – TMF	83,990
Total purchases of IT equipment (excluding service activities) – PS	11,980
Total purchases from circular circuits	139,964
% of circular inputs in group purchases	5%

[DP 31a – DP 31c]

Given the nature of the group's activities, the volumes are presented as numbers of pieces of IT equipment and not in weight because the unit does not seem relevant to us.

[DP 32]

To prepare its report, the group used data from direct internal measurements (ERP, internal extractions) and external measurements (suppliers, manufacturer sites). We consolidated the data at the country level, because the volumes of re-dimensioned assets are more interesting and easier to process by areas of responsibility by country ⁽¹⁾.

3.6. Outgoing resources [DR E5 5]

[DP 35]

Econocom does not transform the resources that enter into its activity, it only distributes or leases them. The only entity that transforms is the reconditioning subsidiary Econocom Factory.

However, partners in our value chain allow us to indirectly recondition more assets.

In total, the proportion of reconditioned assets in the group's purchases, in volume, is 17%.

(1) We reported a 9% growth in reconditioned assets in 2024 vs 2023 (461,956 reconditioned assets). The figure for the proportion of waste that will be treated as WEEE has been estimated based on data provided by our external partners, as well as by Econocom Factory. This share is not significant for Econocom. However, we have collected as much data as possible to make this estimate. It should be noted that waste is the direct responsibility of our external partners, which justifies the difficulties in consolidating this data at group level.

3.6.1. METRICS RELATED TO THE OBJECTIVES DEFINED IN E5-3

Econocom addresses the issue of sustainability in relation to its strategy, thanks to its activities that allow the reconditioning of its assets.

For the end of lease contracts, there are two possibilities:

- either Econocom Factory purchases the equipment to recondition it;
- or external partners purchase the equipment to recondition it.

	2024
Total end of outsourced leasing contracts (1)	415,997
Econocom Factory (2)	88,573
Total purchases from circular circuits	504,570
% of outgoing circular resources of the group	17%

3.6.2. GENERAL CSRD METRICS ON PRODUCTS/MATERIALS AND WASTE TREATMENT

3.6.2.1. Products and materials

[DP 36a]

Average lifespan of products returned to the market (1)

Performance indicators (outgoing flow of resources)	Unit	2024
Estimated lifespan of products placed on a market (compared to the industry average)	Year	3-4 years

[DP 36b]

The company describes in detail the key products designed according to circular principles, highlighting their sustainability, reparability and recyclability. This contributes to a circular product life cycle. Each product has a description sheet containing its characteristics (including the reparability index). The warranty card specifies the duration and nature of the warranties as well as the customer service terms for any request.

The company has the ability to recondition and repair by replacing components of mobile phones (batteries, screen, microphone, cameras (2)). It has established a number of procedures to train its operators.

[DP 36c]

Recyclability rate of product content

Given the multitude of IT equipment sold by the group, it is not possible for us to determine the recyclability rate of all products or an average recyclability rate.

(1) A sector average was used to estimate the lifespan of products returned to the market.

(2) Excluding motherboard.

3.6.2.2. Waste treatment

As a consumer electronics company, e-waste is a major issue for us. The company describes the e-waste streams it generates and the measures taken to manage them sustainably. We identify the types of materials present in these waste streams, including metals, plastics and critical raw materials, thereby facilitating recycling and waste management efforts.

[\[DP 37a- DP 39\]](#)

Overall, Econocom reconditions/repairs/recycles 17% of the assets it recovers, and 6% goes into waste and WEEE treatment. Consequently, the waste generated by the group is not significant and the data points relating to waste management have therefore not been measured and reported.

[\[DP 38a- DP 38b\]](#)

Econocom Factory provides 100% refurbished products, including a 24-month commercial warranty. It communicates the importance of protecting devices to extend their lifespan and adopting sensible battery usage and charging habits.

In addition, the company works with environmental organisations (the company pays an eco-contribution for each product sold and packaging placed on the market: this financial contribution is intended for eco-organisations) and approved service providers in the management of its waste. We adopt a rigorous sorting system at our workshops with displays and containers adapted to each type of waste. The QHSE (Quality, Hygiene, Safety, Environment) team carries out regular checks on the effectiveness of sorting and awareness-raising actions.

3.7. Expected financial effects of resource use and the circular economy [DR E5 6]

The group will gradually implement the new information requirements ⁽¹⁾ on resource use and the circular economy following the first publication

Appendix C of ESRS 1 provides that a company subject to these requirements has an exception from reporting quantitative elements in the first year of compliance.

(1) In accordance with Annex D of ESRS 1 of the CSRD directive.

4. Company employees [ESRS S1]

Because people are its most valuable asset, the Econocom group's 8,446 employees⁽¹⁾ are its chief concern. It is therefore committed to:

- equality and diversity, by fighting against all forms of discrimination arising from visible and invisible differences. Because each employee is unique, the combination of each person's talents is a real strength and essential to the group's success;
- developing skills to have the necessary capabilities to implement its strategy, maintain and strengthen its staff's employability and stimulate their talents. The group invests in each of them, but also in developing work-study schemes and hiring interns;
- career development of its employees. The group has always made a point of helping staff who demonstrate real potential by offering them a number of opportunities in its various companies, in order to ensure they live up to their potential;
- quality of life at work. As taking care of its employees is a priority, the group offers them quality social protection and attractive and constantly improving working conditions, in order to guarantee

their health and safety on a daily basis and a good work-life balance and job satisfaction.

4.1. Stakeholder interests and views [ESRS 2 SBM 2]

[\[DP 12\]](#)

The consultation of stakeholders described in section SBM2 of ESRS 2 applies to all sustainability topics. Regarding employees, specific consultations with the employee representative bodies took place.

Employees are represented through a number of staff representative bodies within the group. These structures are designed to ensure exchange of information between the Econocom group management and its employees. They play a crucial role in the management of industrial relations in the group's companies and help to ensure fair representation of employees and the safeguarding of their rights and interests.

The European Works Council, made up of representatives from the different countries in which the group operates, is consulted each year about the annual report.

(1) Effective as of 12/31/2024

The Group Committee, made up of representatives from different French subsidiaries, is informed each year of the development and annual or multiyear employment forecasts.

In France, employees are represented by a Social and Economic Committee (SEC) in each of its companies. This committee consults employee representatives every year on the company's strategic directions and labour policy, working conditions and employment.

These consultations ensure that workers' interests, opinions and rights are taken into account.

In order to ensure an informed opinion from staff representatives, the annual report, financial statements, major guidelines and numerical data are presented and made available to them, particularly within the framework of the Economic, Social and Environmental Database (ESEDB). If necessary, experts, mandated by the Social and Economic Committee, carry out an audit in order to complete the analysis. The opinion of the SEC on the company's strategic directions is passed on to the bodies responsible for the administration and supervision of the Company, which then provides a reasoned response.

4.2 Significant impacts, opportunities and risks and their relation to strategy and business model [ESRS 2 SBM 3]

[DP 13a ; DP 13b]

All the impacts identified below are a result of the strategy deployed by the group in terms of labour policy.

Econocom has naturally only identified material impacts in its double materiality analysis. Nevertheless, there are risks and/or opportunities which could, in the short term, also become material for the group.

[DP 14]

Equal opportunities

The Econocom group is particularly committed to promoting diversity and developing an inclusive culture and therefore contributes positively to equal opportunities in its **direct activities** in a variety of areas (see ESRS 2) of the general information standard:

- ensuring the appropriate skills and developing vocational training;
- promoting diversity and inclusion;
- inclusion and job protection for people excluded from the job market, particularly people with disabilities;
- combating all forms of discrimination.

Respect for human rights and labour law

The Econocom group can contribute negatively regarding Respect for Human Rights and Labour Law, on its **direct activities and in its value chain** in the following areas, explained in **DP 49 of SBM 3** of the general information standard:

- respect for human rights in our activities;
- security and protection of employees' personal data.

Working conditions of employees

The Econocom group can contribute both positively and negatively regarding the working conditions of its employees, on its direct activities through the following areas explained in DP 49 of SBM 3 of the general information standard:

- collective bargaining agreements (regulatory and non-mandatory);
- management of employees on non-permanent contracts (e.g. fixed-term contracts, temporary workers, service providers, etc.);
- remuneration and benefits policy (including value sharing system);
- quality of life at work (including work-life balance and prevention of workplace accident risks).

[\[DP 14a\]](#)

The Econocom group is established in 16 countries. It is the only European group to cover all areas of digital expertise, ranging from equipment to services, including financing, audiovisual and reconditioning.

The European positioning has been recognised for many years in the group's legacy businesses. These businesses are described in the general information standard.

[\[DP 14b\]](#)

The potential negative impacts that the group may have concern elements associated with human rights, security and protection of personal data, management of employees on non-permanent contracts and quality of life at work.

Any breaches in these areas can result in a systemic risk for the group. However, in reality, these are fairly limited due to Econocom's vigilance.

To date, there have been no breaches in the above-mentioned areas.

[\[DP 14c\]](#)

Econocom has a positive impact on its employees in the different countries where the group operates (impacts described above):

- France;
- Belgium;
- The Netherlands;
- Spain;
- Italy;
- Germany;
- Poland;
- Romania;
- The UK;
- Morocco.

[\[DP 14d\]](#)

The risks and/or opportunities with respect to Econocom employees were not identified as material by the group during its double materiality analysis (see ESRS 2 double materiality matrix). Nevertheless, Econocom makes a point of taking measures to prevent and mitigate them if they arise and become material in the future.

[\[DP 14e\]](#)

There are no potential or actual material impacts of the company on its employees regarding the implementation of its environmental transition plan. If there is an impact, it will be positive towards employees, due to the initiatives launched by the group (section E1 3 of the climate change standard).

[DP 14f]

Econocom does not have any activities in countries that present significant risks in terms of forced labour. The measures it takes to ensure respect for human rights and working conditions in its value chain are described in DPI0a – ESRS S2.

[DP 14g]

Econocom does not operate in countries that present significant risks in terms of child labour. It also ensures that its various partners (suppliers, service providers, etc.) respect human rights and prohibit any use of child labour.

[DP 15]

Econocom's HR representatives identify on a daily basis vulnerable groups of workers requiring special and reinforced monitoring, particularly with regard to their working conditions. The criteria for identifying this category of workers are their profession and working conditions, particularly with regard to the client's activity. The professions most exposed to occupational risks are:

- factory workers in the reconditioning division;
- technicians and managers of call centres in service centres.

These activities take place on Econocom premises and an HR team closely monitors these vulnerable groups of workers and their exposure to certain risks (amount of time spent standing, noise levels, management of potential conflicts, etc.).

In 2023, Econocom implemented a support and assistance system for technical support managers and technicians in Grenoble, who answer calls and may be required to

manage difficult situations. Employees working on the telephone, in particular, were given early screening for hearing loss. Following the success of these schemes, they were renewed and extended in 2024.

Close medical monitoring is also provided for employees exposed to risks that could have serious consequences, such as those potentially exposed to ionising radiation.

[DP 16]

Risks concerning vulnerable workers were not identified as material by the group in the course of its double materiality analysis. Nevertheless, Econocom makes a point of taking measures to prevent and mitigate these risks. These include support for technical managers, as well as carrying out a medical assessment, etc.

4.3. Human Resources Policies [S1-1]

[DP 19]

The Econocom group's policies in relation to the **strategic issues described in DP 13 of S1** are in particular the following and concern:

4.3.1. RESPECT FOR HUMAN RIGHTS AND LABOUR LAW

[DP 20]

The management of potential negative impacts with **respect to human rights** is addressed by Econocom through a number of systems. As a European group, Econocom must comply with strict regulations and guarantee respect for human rights and more particularly the labour laws in force in each of its geographical locations. This respect is broken down into several aspects as described in the data points below:

[DP 20a – DP 20c]

- **ensuring respect for human rights:**

Informing stakeholders about existing legislation (directives, legal and regulatory texts, collective agreements, etc.) is essential to guarantee the transparency of practices, ensure that employees' rights are effectively taken into account and enable their rights to be implemented. Thus, upon hiring, each employee is given documents (onboarding booklet, internal regulations, etc.) setting out their rights and obligations. The organisation of the HR department is designed to guarantee the enforcement of employees' rights. Thus, under the leadership of the Group Human Resources Coordination Director, Human Resources Directors, who are members of the Management Committees of each of the group's entities, roll out the HR strategy and policy in their respective areas. In addition, a Legal Counsel specialising in employment law assists HR with legal monitoring. Employees and their representatives have various means of staying informed of their rights and reporting any potential abuses. The companies' employee representative bodies are informed and consulted regularly and have various specific reporting rights. Employees can ask their local HR representatives questions on HR-related matters or about their remuneration via the Payroll department contact system, through a ticketing system;

- **security and protection of personal data:** employees can download all the necessary onboarding documents (internal regulations, welcome booklet, IT Charter, health insurance policies, pension plans, collective agreements, etc.). The tool also centralises requests for equipment and employee access rights. When a person leaves, access is automatically suspended and employees' personal information is deleted within the time limits set by the laws in force. We constantly guarantee data security. The IT Security department and Data Protection Officer are systematically involved in projects involving the processing of personal data. In addition, Econocom keeps processing records to control the risks associated with the processing of personal data, such as data transfers, their security and retention periods in accordance with GDPR (see chapter "**impact report**").

[DP 22]

By complying with human rights and labour laws in all the countries the group operates in, it ensures that there are no incidents of human trafficking, forced labour and, in particular, child labour. In addition, through rigorous supplier selection processes, Econocom ensures that these issues are also taken seriously by the partners in its value chain (**see the G1 business conduct standard**).

[\[DP 23\]](#)

The Econocom group implements appropriate means of detecting and preventing risks in terms of health, safety and working conditions. The Health and Safety policy defines the rules applicable to each work situation, the individual and collective protective equipment and the conduct to be adopted in the event of an incident or accident. A safety and prevention team is in charge of employee training, risk identification (single professional risk assessment documents) and the methods of monitoring groups of workers deemed vulnerable. In the event of an accident at work or on the way to work, they are called upon to determine the precise causes and implement appropriate corrective measures to prevent and avoid further accidents.

[\[DP 24a – DP 24d\]](#)

4.3.2. EQUAL OPPORTUNITIES

The Econocom group's main strengths are the variety of its business expertise, the diversity of skills and experience and the open-mindedness of its employees. The group thus focuses on recruitment and development in line with the skills of each individual and is against all forms of discrimination. It promotes equal opportunities, professional equality, diversity and inclusion in all its companies.

The management of **positive impacts with respect to equal opportunities** is addressed through several systems at Econocom, such as:

- **Econocom's impact (positive) of the fight against discrimination:**

- ▶ One of the group's drivers to promote diversity and inclusion, included in its

strategic plan for 2028, is the development of an **inclusive employment model focusing on the recruitment and retention of people with disabilities** across all its entities. To that end, the group has set itself the strategic objective of reaching **6%** (at least) of employees recognised as having disabilities by 2028,

- ▶ This objective has already been achieved in the Netherlands. (see Actions and Targets set (S1-4 and S1-5).
- ▶ Econocom is also a signatory to the **Diversity Charter**: the group is convinced that diversity is a factor in individual and collective performance and success. The Diversity Charter encourages signatory organisations to promote diversity in their workforce and in all human, commercial and career management activities through concrete actions. Econocom is committed in particular to raising awareness among its employees involved in recruitment, skills and career development, to respecting the principle of non-discrimination, reflecting the diversity of the Company and communicating positively to all its employees,
- ▶ The Group's **Code of Business Conduct** specifies in the sections "Fight against discrimination" the criteria for non-discrimination, in particular: race, sex, age, health, religion, sexual orientation, political or religious opinions and trade union affiliations. The chapter on "Fight against harassment (moral and sexual)" prohibits any behaviour, word, act, gesture or text that could harm the physical or psychological integrity of a person who may or may not be a Group employee.

- ▶ Compensation and benefits policy:

"Gender Pay gap": the group, through its strategic plan, also focuses on fostering a more egalitarian employment model, particularly with respect to equal pay for men and women: the group aims to exceed the 90/100 "gender pay gap" score by 2028.

- This target has already been reached in Belgium, France, Italy and Spain. (see Actions and Targets set (S1-4 and S1-5).

4.3.3. WORKING CONDITIONS OF EMPLOYEES

The management of negative impacts with respect to working conditions is addressed through several systems at Econocom, such as:

- **Compensation and benefits policy:**

- ▶ Living wage: This indicator reflects our commitment to sustainable and inclusive performance and aims to ensure that remuneration allows each employee to:
 - ▶ Cover basic needs: housing, food, health, education and transport
 - ▶ Have the financial means to cover expenses beyond basic necessities

- ▶ **social security cover:** the Econocom group offers its employees quality social protection enabling them to cope with life's uncertainties. It offers its employees effective schemes for health insurance and covering risks for incapacity, disability and death;

- **Positive impact linked to the creation of a strong social culture and a climate of trust within the workforce (collective agreements in force):**

- ▶ Each company complies with the labour rights and regulations in force in the country in which it operates. The 50 companies that make up the group are, for the most part, covered by collective agreements and/or agreements that supplement national laws. They define the statuses and rights (classification, remuneration, working conditions) of workers in a professional sector, a group of companies or a company. The terms are defined in the course of negotiations between the employer and employee representatives. Some companies have too few employees to implement company collective agreements, but their statuses are systematically defined contractually and are aligned with country standards ⁽¹⁾;

(1) In France, the most widespread collective agreement in the group's companies is Syntec. Econocom Factory employees are covered by the national collective agreement for the metal industry.

- ▶ HR Committees are organised regularly, including all HR representatives of the activities, to streamline communication and harmonise best practices as well as certain benefits within its various entities. To that end, in France, a number of schemes have been put in place, such as a group collective agreement for contributions to health and welfare schemes. These Committees have also made it possible to harmonise certain benefits in the various entities, within the framework of the Mandatory Annual Negotiations. Thus, in 2024, we were able to grant all of our employees with disabilities Universal Employment Service Vouchers (UESV) worth €500, fully paid for by the companies,
- ▶ Many ongoing projects also aim to harmonise best practices. Thus, negotiations were opened at the end of 2024 with a view to establishing an agreement covering French companies in terms of professional equality between men and women,
- ▶ The main company agreements concluded cover topics such as working hours (including overtime, on-call duty, days donation), remote working or remuneration,
- ▶ These agreements are intended to cover permanent employees but also employees on non-permanent contracts (fixed-term contracts, temporary workers). Specific provisions are also made in these agreements concerning them;

- **positive impact with respect to the well-being of Econocom employees:**

- ▶ Favourable working conditions and maintaining a good work-life balance ensure the long-term loyalty of employees with permanent contracts. Social protection, which covers key family events for 98% of employees, fosters the long-term commitment of employees as they receive support during key moments in their lives,
- ▶ The group regularly organises health prevention initiatives. In 2024, it enabled certain employees to benefit from a free flu vaccination, hearing tests or general medical checkups, at their workplace. Awareness-raising actions on the need for exercise and a balanced diet have been deployed, in particular during the Quality of Life at Work week. These actions also benefit non-permanent employees.

4.4. Econocom's commitment to its employees [S1 -2]

[DP 27a – DP 27e ; DP28]

Employees elect their representatives in each structure. These representatives serve on various industrial relations bodies, to ensure the exchange of information between Management and employees. They play a decisive role in labour relations across the group's entities and help to guarantee fair representation of employees and the defence of their rights and interests.

The European Works Council

The European Works Council, composed of representatives from the different countries the group operates in, is consulted each year on the annual report. This Committee is an information and consultation body at European level. It does not replace local authorities and cannot call into question the prerogatives held by these institutions under national legislation.

The council is composed of at least one full member per European Union country where Econocom is present and in which there is employee representation. Additional seats are allocated according to the workforce in the countries concerned, in tranches of 10% of the total workforce.

Its purpose is to promote information and the exchange of views and discussions on economic, financial and social issues which, by virtue of their overall nature and transnational implications, require examination in such a framework, such as the structure, the economic and financial situation, the likely development of activities and employment, substantial changes to the organisation, the introduction of new working methods, new production processes or CSR policy. Matters which concern all Econocom entities in the European community, or at least two entities in the group located in two different member states are considered to be transnational.

This body meets at least once a year, during an ordinary meeting. Extraordinary meetings may also be held depending on current events and working groups may be organised by the EWC on cross-functional subjects common to the various European countries.

In Belgium, three bodies play a key role in this process: the Works Council, the Committee for Prevention and Protection at Work and the Trade Union Delegation.

The Works Council is composed of 18 members: 7 members elected as full members, 6 members as substitutes and 5 members as designated staff representatives. It meets 12 times a year to discuss strategic and operational issues. In addition to these regular meetings, an extraordinary meeting is held each year to deal with urgent or specific issues.

The Committee for Prevention and Protection at Work (CPPT) is composed of 17 members: 6 members of staff elected as members, 6 members as substitutes and 5 members as effective delegates of the employer. This Committee also meets 12 times a year and is essential to guarantee the safety and well-being of employees in the workplace. The discussions focus on measures to prevent occupational risk and improve working conditions.

Lastly, the Trade Union Delegation, which also has 8 members, meets on request. On average, these meetings take place once a month. The delegation plays a role in representing the interests of employees and negotiating working conditions with Management. It can issue binding decisions on certain subjects.

In France, the Group Committee, composed of representatives of different subsidiaries, is informed each year on the activity, financial situation, developments and annual or multi-year employment forecasts and any preventive actions planned in light of these forecasts in the group and in each of its companies. It is also informed of the group's economic outlook for the following year.

The employee delegation is made up of 15 full members and 15 substitutes, appointed by the trade union organisations from among their elected representatives within the various Social and Economic Committees (SEC) of the group's French companies, for 4-year terms.

This body meets at least once a year, during an ordinary meeting. Extraordinary meetings may also be held depending on current events.

The Social and Economic Committee

In France, employees are represented by a Social and Economic Committee (SEC) set up in each of its companies. The Committee consults employee representatives each year on:

- the strategic directions of the company;
- the economic and financial situation of the company;
- the company's labour policy, working conditions and employment.

These consultations help ensure that workers' interests, views and rights are taken into account.

In order to ensure an informed opinion from staff representatives, the annual report, financial statements, major guidelines and numerical data are presented and made available to them, particularly within the framework of the Economic, Social and Environmental Database (ESEDB). If necessary, experts, mandated by the Social and Economic Committee, carry out an audit in order to complete the analysis. The opinion of the SEC on the company's strategic directions is passed on to the bodies responsible for

the administration and supervision of the Company, which then provides a reasoned response.

These Committees meet once a month in companies with more than 300 employees and once every two months for others.

Other Committees

Specific committees are also designated from among the members of the SEC of companies with more than 300 employees: Professional Equality Committee, Training Committee and Hygiene, Safety and Working Conditions Committee.

At least four annual meetings must focus on topics with respect to the health, safety and working conditions of employees. The SEC also meets following any serious accident or reasoned request from the majority of elected representatives.

The SECs have the means to exercise their prerogatives and in particular the financial means to cover their operating expenses and implement social and cultural activities for the benefit of employees.

The points raised within each of the bodies are transcribed in minutes and communicated to employees, most often by posting notices. The President of the various bodies ensures that commitments made to employees are honoured and that information from the representative bodies is reported to Management.

The social climate in each structure makes it possible to measure the efficiency of employee-management relations:

- prevention of industrial conflicts (strikes);
- signing of collective agreements within the areas concerned.

4.5. Communication channels and negotiation processes to address negative impacts [S1-3]

There are four forms of significant negative impact that can occur to the detriment of employees:

- individual or collective conflicts between employees;
- individual conflicts between the employee and the employer;
- harm to the employee by a third party;
- work accidents resulting in sick leave or disability.

[\[DP 32a\]](#)

The employee representatives as mentioned above ensure the direct and collective expression of employees on a daily basis. They also have various alert rights, particularly in the event of an infringement of the rights of individuals, serious and imminent danger, or a serious risk to public health and the environment.

As such, they report to Human Resources representatives any conflicts, injuries or accidents as defined above.

Staff representatives have a dedicated room to receive and support employees. They also have specific resources such as specific hours of their working time allocated to this purpose.

Employees can also make any reports directly to Human Resources representatives or directly use their right to alert.

If the solutions offered within the organisation do not remedy the breaches mentioned, the conflicts may be brought before the competent courts.

In France, the dispute can be brought before the Industrial Tribunal within a period of:

- one year in the event of termination of contract;
- two years in the event of a dispute over the performance of the employment contract;
- three years to obtain payment due; or else
- five years for serious acts such as harassment or discrimination.

The purpose of the industrial tribunal is to attempt to reach an agreement in advance of the ruling.

Similar actions and remedies, with statutes of limitation, before the courts exist in each country in which the Econocom group operates. Thus, in Belgium, these disputes can be brought before the Labour Court, in Spain, before the Juzgado de lo Social, for example.

These jurisdictions are, most often, joint.

If Econocom is found liable for a negative impact, the competent courts determine the compensation awarded to the employee.

[DP 32b – DP 32e]

If an employee suffers harm due to a third party, they must immediately speak to their superiors or HR manager. To facilitate reporting and provide an alternative, the Group Ethics Committee has created a secure external whistleblowing platform. It guarantees anonymity to allow the reporting of breaches of the Code of Conduct or regulations that employees may witness or be victims of. For each incident reported, to HR or the Ethics Committee, an investigation is conducted to assess the breaches and may result in sanctions, if necessary. The procedure for investigating and handling breaches is available on the Intranet.

In the event of an accident at work, the employer is liable. The employee must immediately inform his or her superiors or HR manager. Under certain conditions, he or she benefits from continued pay in the event of subsequent incapacity to work, as well as welfare coverage allowing continued pay, according to the terms of the insurance contract taken out. The welfare coverage also covers the risks of disability and death. The health and safety department ensures the security of the premises and the working conditions of employees. The internal regulations specify the legal framework⁽¹⁾ for safety at work and invites employees to report any anomalies. Staff representatives also have the right to alert in the event of serious and imminent danger and employees have the right to withdraw in the event of such situations.

(1) Article 3 of the internal regulations.

[DP 33]

These procedures are brought to the attention of employees when they are hired or when they are implemented. They have direct access to these procedures.

Information with respect to staff representatives is also accessible, in particular by means of posting notices, in order to enable them to identify their representatives, as well as their role.

Staff trust their representatives and the whistleblower system to raise concerns or needs and ask for them to be addressed.

In addition, Econocom protects people who use these structures or procedures, or whistleblowers, from retaliation, including employee representatives (**see business conduct standard G1**).

4.6. Actions and approaches to address defined policies [S1-4]

[DP 37]

The actions and/or approaches that have been implemented at Econocom to address the policies described in S1-1 and with respect to negative and positive impacts (see ESRS 2 double materiality matrix) are as follows:

[DP 38a – DP 38d]

4.6.1. RESPECT FOR HUMAN AND LABOUR RIGHTS

- actions implemented by the group with respect to potential negative impacts on human rights within our activities: The Code of Business Conduct underlines the Group's zero tolerance approach to practices which are contrary to human rights and rights in terms of discrimination or harassment. Sanctions are mentioned for employees, agents or business partners. In addition, "harassment" representatives are trained to support employees on these priority issues and are the designated contact people for employees in these situations. A whistleblower hotline at Group level allows incidents to be reported anonymously. If the employee agrees to go public, an investigation is conducted jointly between human resources and staff representatives, or even the labour inspectors, in order to establish the facts and implement appropriate sanctions. The Econocom group also implements awareness-raising actions and offers general or specific training on the subject, for example, on the prevention of verbal violence in the Services activity in France.
- actions implemented by the group with respect to the potential negative impacts on the security of employees' personal data: Econocom employees have access to a secure intranet to submit documents containing personal and sensitive data required for hiring. They are automatically sent to the secure safe of the employee

file. A delegated data protection officer defines the rules and processes to ensure compliance with the general data protection regulation. A project is underway to audit all of the Group's departments and monthly steering committees are held with international contacts. Where cybersecurity is concerned, through the nature of its activity, Econocom is particularly attentive. A team is dedicated to securing the Group's tools and working on certifications.

4.6.2. EQUAL OPPORTUNITIES

Econocom's impact (positive) with respect to diversity and inclusion:

- the group (through its strategic plan) also emphasises the strengthening of its HR policy based on the inclusion of people with disabilities.
 - ▶ in France, a dedicated policy for recruiting and retaining people with disabilities has been launched and rolled out thanks to the "**disability mission**" project. This commitment is based on both internal support (administrative, financial and communications) and external support, via the development of partnerships aimed at recruiting people with disabilities or using service providers that employ people with disabilities.
 - ▶ **internationally**, the first action plans setting forth detailed measures for each country will be implemented in the **first half of 2025**.

- the group also promotes gender parity as part of its diversity and inclusion policy.

- ▶ in France: Several measures have been deployed to promote gender parity within each of its employment sectors. Firstly, awareness-raising actions with respect to women's access to positions where they are underrepresented. These actions include the signing of the #ReconversionFemmesNumérique Manifesto, or the establishment of the Femmes du numérique working group, intended to promote digital careers among women in order to increase the number of women recruited in industries where they are underrepresented.

In addition to existing awareness-raising initiatives, the Econocom group began negotiations with its trade union bodies in France at the end of 2024 in order to implement, as of 2025, a collective group agreement on gender equality, aimed at covering all of its entities in France.

The group also intends to help women break the glass ceiling. To that end, a series of promotional, communication and awareness initiatives will also be implemented in 2025. In terms of recruitment, we are implementing a salary scale with minimum and

maximum thresholds to reduce the pay gaps between women and men, both at the time of hiring and throughout their careers. This approach will gradually be extended to other countries in order to fulfil our obligations on salary transparency.

- **Econocom's impact (positive) of the implementation of the fight against discrimination:** In the event of a breach (as explained in 9.1.3.2 of S1-1), sanctions are set out for employees, agents or business partners. To facilitate reporting ⁽¹⁾, the Group **Ethics Committee** has created a secure external whistleblowing platform (see **data points with respect to publications on the business conduct standard**).

- **Compensation and benefits policy:** Gender Pay gap and decent wage: the group, through its strategic plan, also places emphasis on strengthening equality in the workplace, with a particular focus on equal pay between men and women.

- ▶ in France: the continuous improvement of the professional equality index published each year for companies employing more than 50 employees demonstrates its commitment to professional equality.

(1) Staff still have the option of reporting incidents to their Line Manager.

- ▶ in Belgium: The actions deployed to date focus on reducing wage inequalities and mitigating the impacts of individual negotiations (standardising structural merit criteria rather than negotiating on a case-by-case basis). In addition, the group wishes to improve the local and legal wage adjustment index.
- ▶ in Spain, action plans on gender parity in the workplace have been negotiated with staff representatives, who ensure their effectiveness and monitoring.
- ▶ in other countries, the implementation of the first action plans is planned for the **first half of 2025**.

4.6.3. WORKING CONDITIONS OF EMPLOYEES

• Econocom's impact (positive) on working conditions:

- ▶ the Econocom group implements appropriate means of detecting and preventing risks in terms of health, safety and working conditions. The Health and Safety policy defines the rules applicable to each work situation, the individual and collective protective equipment and the conduct to be adopted in the event of an incident or accident. A safety and prevention team provides employee training, risk identification (single professional risk assessment documents) and the methods of monitoring groups of workers deemed vulnerable. In the event of an accident at work or on the way to work, they are called upon to determine the precise causes and implement appropriate corrective measures to prevent and avoid further accidents.

- ▶ specific preventive measures are also applied for certain vulnerable groups of workers, due to their working conditions, such as hearing tests for employees working in call centres or specific actions to learn how to manage difficult situations,
- ▶ the group regularly organises health prevention initiatives. In 2024, it enabled certain employees to benefit from a free flu vaccination, hearing tests or general medical checkups, at their workplace. Awareness-raising actions on the need for exercise and a balanced diet have been deployed, in particular during the Quality of Life at Work week.

4.7. Targets for the management of negative and positive impacts [S1-5]

The targets that have been established at Econocom to address the policies and actions with respect to the negative and positive impacts described in **DP 49 of SBM 3 of ESRS 2** are as follows:

[\[DP 44\]](#)

4.7.1. EQUAL OPPORTUNITIES

In France, the creation of the disability project and the development and deployment of a strong policy on the recruitment and retention of people with disabilities has led to a doubling of the rate of employees with disabilities in a few years.

In 2014, we entered into a partnership agreement with Agefiph⁽¹⁾ then a disability agreement in 2018, renewed in 2021 for three years. Econocom has committed to setting up a new partnership with Agefiph, which is currently being concluded.

(1) Association for the management of the fund for the integration of disabled people.

With these agreements, the group has committed to increasing its employment rate for people with disabilities. Thus, the rate of employees with disabilities calculated for the DOETH increased from 2.61% in 2018 to 5.81% in 2023. The 2024 rate will be published in May 2025. The increase in the employment rate was possible thanks to actions, in line with the targets defined in the agreements. These targets aim to develop our employment policy in favour of workers with disabilities, including recruiting, training and onboarding.

- maintaining people with disabilities in employment through individualised monitoring by Mission Handicap and the HR contact. The occupational health service recommends adjustments to workstations in order to facilitate use by employees with disabilities.
- raising awareness of disability among all internal stakeholders through training provided by an external firm, and also among Econocom employees during events such as the European Week for the Employment of People with Disabilities.
- increase subcontracting with companies that specialise in employing people with disabilities, thereby indirectly contributing to the employment of workers with disabilities.

Econocom is also a signatory of the "Inclusion Manifesto", an association with more than 130 signatory companies committed to employing people with disabilities and thus help transform society and make diversity a strength.

Several communication and awareness-raising actions and the implementation of incentive measures such as the benefit of additional paid leave days, specific, tailored support, an annual interview, workstation adjustments to make them easier to use by people with disabilities have helped change employees' vision of disability, promote a culture of diversity and inclusion, encourage employees to take steps to recognise disabled workers and raise our profile, in a healthy environment recognised as "disabled-friendly". In 2024, Econocom's French companies set up a new disability compensation system for employees: each employee with a disability will be able to benefit, each year, from Universal Service Employment Vouchers worth €500, fully covered by Econocom.

The group now wishes to extend and develop this policy of employing people with disabilities at all of its companies, and has made it one of its priority objectives as part of the strategic plan. Thus, an inventory was carried out in each country where the group operates in order to define a roadmap for improving this rate locally and to implement an appropriate local action plan. Discussions on best practices in this field are being held in order to go beyond the legal requirements, which vary considerably from country to country in Europe.

Social model on the inclusion of people with disabilities	2024	2028
% Group	4.60%	6%

The group's companies are particularly attentive to equal pay between women and men. Local initiatives have been launched in France, Belgium, Spain and the Netherlands. To sponsor the subject at Group level, the gender pay gap has been included in the HR indicators of the strategic plan. Steering committees are held regularly with local HR to monitor the progress of this project, which aims to develop a group job reference framework

to categorise employees according to objective criteria and then establish pay scales according to role and seniority.

In France, during salary reviews, indicators on pay rise gaps between women and men make it possible to raise awareness among managers about the expected equality of treatment. Thanks to the exchanges of good HR practices, positive measures have been rolled out across the Group.

Gender pay gap	2024	2028
Group Index	92.1/100	> 90/100

This indicator is calculated on the average annual remuneration, i.e. the fixed remuneration on a full-time equivalent basis and the variable components actually paid over the reference year for employees on permanent contracts and fixed-term contracts present on December 31, 2024. Analysing the salary on a full-time basis offsets the effects of absences, arrivals, departures, etc.

The workforce is analysed across comparable populations on the level of responsibility and age group which allows professional experience to be estimated.

Three categories of employees (operational, middle manager and top manager) were created to represent the levels of responsibility.

The calculation methodology is based on the one defined by the French government as part of the first indicator of the professional equality index between men

and women. This index has been published since 2019 and ensures consistency in France, where the majority of the workforce is employed.

In accordance with this methodology, the data must be representative. Thus, only groups with at least three men and three women are taken into account and the indicator cannot be calculated if less than 40% of the workforce is represented. A relevance threshold of 5% is applied to correct the discrepancies arising from the different expertise of the employees compared. The categories must include all professions in order to correct the biases resulting from the lack of gender mix in certain professions.

This indicator is calculated as part of the Group's 2024-2028 strategic plan. To ensure the representativeness and sustainability of the indicator, countries with fewer than 50 employees (10 countries or 118 employees) are not included, nor are discontinued companies.

4.7.2. WORKING CONDITIONS OF EMPLOYEES

[DP 46]

A safety and prevention team is in charge of employee training, risk identification (single professional risk assessment documents) and the methods of monitoring groups of workers deemed vulnerable. In the event of an accident at work or on the way to work, they are called upon to determine the precise causes and implement appropriate corrective measures to prevent and avoid further accidents.

Each company aims to reduce and control the number of its work-related accidents and illnesses. Thus, the frequency and severity rates of work-related accidents are regularly calculated in order to assess changes.

Controlling absenteeism rates in each company is also a crucial issue. It is therefore calculated monthly and communicated by the Human Resources Departments to the Management Committees of each entity.

These figures are also communicated to staff representatives who can assess their development.

The group regularly organises health prevention initiatives. In 2024, it enabled certain employees to benefit from a free flu vaccination, hearing tests or general medical checkups, at their workplace. Awareness-raising actions on the need for exercise and a balanced diet have been deployed, in particular during the Quality of Life at Work week.

The group also attaches particular importance to the regular monitoring of certain indicators enabling it to measure the impact of employees' working conditions, such as attrition rates, the rate of recourse to precarious employment, and the number of hours of training provided.

Also, as part of its strategic plan, the group has set itself the objective of obtaining HR certification in this field by 2028. Obtaining such certification demonstrates the quality of the working conditions of employees, who complete a satisfaction questionnaire.

Exaprobe was the first to lead the way by obtaining "Happy at Work" certification in 2023. This certification was maintained in 2024.

The group aims to certify at least one other company in a European country by 2025.

[DP 47]

These objectives were shared with the various staff representative bodies within the group, and in particular with the European Works Council, as part of an information consultation on the group's strategic directions. These are then applied to each country and activity, which set their own progress targets, and presents them to local staff representatives.

Each year, information is provided to each of these staff representation bodies on the achievement of the annual objective and the forecasts for 2028.

Each instance can therefore monitor and measure the progress of each of the defined indicators.

In addition, all the group's employees are kept regularly informed of the progress of the group's strategic plan, including details of these indicators, so they can follow the progress made in this area.

Targets relating to the strategic plan are closely monitored by the Human Resources department, the BDS department (in charge of monitoring the strategic plan), as well as the CSR department (in charge of consolidating sustainability statements).

4.8. Characteristics of the company's employees [S1-6]

[DP 50d]

The group's workforce is recorded as full-time equivalents as at December 31, 2024. This methodology identifies the resources available at the end of the financial year in due proportion to the contractually expected working time.

As a European group, the majority of our employees are physically present in European countries.

The calculation of staff numbers takes into account the count set by national regulations. They therefore subsequently include permanent contracts, fixed-term contracts and work-study contracts.

[DP 50a]

The calculation method was revised in 2024 in order to better distribute employee and non-employee contracts.

Belgian sales agents and self-employed workers were included in the Group's workforce, and from now on, they are included separately in the indicators for non-salaried employees. The 2023 data has been updated accordingly. This ensures better alignment with financial reporting while maintaining their presence in the annual report.

Non-salaried contracts excluded are service providers, temporary workers, interns, Belgian self-employed workers and sales agents.

Change in headcount by region (as full-time equivalent)	2023	2024
France	4,938	4,696
Benelux	634	664
Southern Europe ⁽¹⁾	2,732	2,822
Northern and Eastern Europe and the Americas ⁽¹⁾	294	265
Total	8,597	8,446

(1) The geographical breakdown is the same as the one presented in the notes to the consolidated financial statements, and includes in 2024 379 employees working for group companies present outside the European Union, i.e. less than 10% of the total workforce.

Breakdown of employees by region (as full-time equivalent)	Men	Women
France	3,637	1,059
Benelux	524	140
Southern Europe	2,069	752
Northern and Eastern Europe and the Americas	146	119
Total	6,376	2,070

05 sustainability report

company employees [esrs s1]

To study the most representative countries, we show a breakdown by country when there are more than 50 employees.

Note: Group companies with highly specialist activities may have limited staff. The small size of the structures promotes agility.

Gender breakdown of employees by representative country (1) (as full-time equivalent)	Men	Women
France	3,637	1,059
Belgium	296	88
The Netherlands	197	47
Germany	77	44
England	42	20
Spain	1,304	434
Italy	603	185
Morocco	163	133
Romania	9	31
Total	6,327	2,041

(1) +50 employees or 10% of total workforce.

[DP 50b]

Breakdown of employees by working hours and region

Full time (number of employees)	Men	Women
France	3,611	975
Benelux	489	100
Southern Europe	2,014	685
Northern and Eastern Europe and the Americas	144	103
Total	6,258	1,863

Part-time (number of employees)	Men	Women
France	38	107
Benelux	45	53
Southern Europe	78	87
Northern and Eastern Europe and the Americas	4	23
Total	165	270

* Employee present at the end of the month (end of month header)

Breakdown of workforce by type of employee contract

Employees (full-time equivalent)	Men	Women
• Permanent contracts	6,114	1,991
• Fixed-term contracts	110	43
• Work-study contracts	152	36
Total	6,376	2,070

The majority of contracts are permanent contracts of indefinite duration. The use of fixed-term contracts is limited to what is permitted by local laws.

Work-study contracts are designed to help young people enter the job market. During training, students can develop professional experience in their chosen field whilst studying for a degree course or State-recognised qualification. Work-study contracts are the equivalent to student contracts in Belgium.

[DP 50c]

Employee departures over the period (in number of employees)

Forced departures	1,051
Voluntary departures	911
Departure rate	23.23%

The departure rate represents 23% of the workforce, which is high; however, this rate is within the average range for the digital sector. Despite this departure rate, employees remain in the Company for an average of three to four years.

This attrition rate must be qualified, as it varies from sector to sector: rates in the design, development and testing job categories are higher (26%). These figures reflect the dynamics of the job market in these sectors.

Departures include resignations and departures at the end of trial periods at the employee's initiative. The total number of departures covers all employees.

The employee departure rate corresponds to the proportion of total departures in the

salaried workforce, including fixed-term contracts.

The most affected areas are France and Morocco. In France, retention actions initiated in 2023 and continued in 2024 (Talent review, People review, implementation of individual development plans, etc.) have made it possible to reduce the rate of departures by 3%.

[DP 50f]

Changes in the workforce by business line highlight the dynamics of growth, transformation or adjustment within the group's different activities.

These variations reflect the company's strategic directions, the adaptation to market needs and the priorities defined in terms of human resource management.

Change in workforce by activity (full-time equivalent)	2023	2024
Holding and support functions	180	193
Technology Management & Financing	766	620
Products & Solutions	2,177	2,240
Services	5,474	5,394
Total	8,597	8,446

Full-time equivalents (FTE) present at the end of December of the reference year for permanent, fixed-term and work-study contracts.

These figures differ from those presented in the financial report, which are based on average annual headcounts.

4.9. Characteristics of non-employees [S1-7]

[DP 55a]

Number of non-employees in 2024 (full-time equivalent)	
Interns	28
Temporary	354
Providers	790
Hours not guaranteed	5
Sales agents	102
Belgian self-employed staff	15
Total	1,298

Full-time equivalents (FTE)

[DP 55b]

To cope with labour shortages and ensure the agility required in the service sector, Econocom uses temporary staff as well as service providers.

Econocom also has longer-term partnerships with non-salaried staff. Econocom advocates autonomy, flexibility and entrepreneurship, and as such has relied on a network of sales agents since its inception. This entrepreneurial model allows agents to benefit from organisational freedom while developing a client portfolio with the support of Econocom (pre-sales, business experts, marketing, etc.).

Zero-hour contracts are used in Germany only. These are employment contracts providing for a maximum of 43 hours of work per month with a minimum hourly wage of €12.41 but with no salary cap. This type of contract facilitates employment of people who have difficulty entering the job market.

In Belgium, we also use independent contracts for positions of responsibility, i.e. the job is not defined in an employment contract or status.

The calculation of the number of non-salaried employees, in Full-Time Equivalents (FTE), is carried out on an

annual basis in order to take into account the reality of the activity of these generally short-term contracts. The number of days worked over the year is divided by the theoretical duration expected for a full-time person. This theoretical number of days varies according to the duration of work applicable within each entity.

[DP 56]

The most commonly used contract is temporary employment, whereby the employee works for a temping agency that provides a service for the duration of the contract. The employee benefits from the same rights as Econocom employees as well as the temping agency's benefits (health insurance, life insurance, profit-sharing, etc.).

Temporary workers are employees of the temping agency and as such report to it. A tripartite contract sets out the terms of the contract between the temping agency, the user company and the temporary worker. During their assignment, the temporary worker is subject to the same obligations as Econocom employees, particularly with regard to the applicable health and safety provisions or internal regulations.

Econocom mainly works with four temping agencies (Manpower, Expectra, Ergalis and Adecco).

Temporary staff are mainly employed for user outsourcing (service desk, user support).

4.10. Collective bargaining and industrial relations [S1-8]

A strong social commitment ensures a high rate of coverage and harmonised practices across the Group.

Employees enjoy more benefits than the minimum required by law. The rare exceptions are structures with a small workforce.

Employees not covered are employees of companies with fewer than 50 employees. They are subject to local legislation. [[DP 60a]

Coverage rate	Collective agreement
France	100.0%
Benelux	92.6%
Southern Europe	100.0%
Northern and Eastern Europe and the Americas	31.7%
Average	97.2%

Our group has set up structured industrial relations mechanisms, both at local and European level, to ensure effective representation of employees in decision-making processes.

Below are the details for the representative European countries.

[\[DP 60b\]](#)

Within this scope, 94% of our employees are represented by staff representative bodies, which guarantees their active participation in discussions and decision-making processes with respect to working conditions and labour rights.

Coverage rate – European countries ⁽¹⁾	Collective agreement	Staff representative
France	100.0%	99.7%
Belgium	99.4%	99.4%
The Netherlands	80.8%	0.0%
Germany	52.4%	52.4%
Spain	100.0%	90.9%
Italy	100.0%	97.7%
Romania	0.0%	100.0%
Average	98.1%	93.9%

(1) +50 employees or 10% of total workforce.

[DP 60c]

Econocom also operates in areas outside the EEA. However, due to the number of employees in these locations, which remains insignificant on a group scale, these areas have not (for the moment) been included in a review of employees covered by staff representative bodies.

[DP 61]

As a group committed to responsible social governance, Econocom ensures that the working and employment conditions of non-employees contributing to our activities comply with ethical standards and regulations in force. Temporary workers, subcontractors and service providers represent an essential link in our value chain. We work closely with our partners to guarantee fair conditions that respect the rights and obligations of each individual.

[DP 62]

Their working and employment conditions are partly influenced by collective agreements in force within our companies. These agreements determine in particular minimum wages, working hours and safety measures. A certain number of these provisions also apply to non-employees.

[DP 63a]

As an indication, we estimate that approximately 82% of non-employees involved in our activities are covered directly or indirectly by these agreements, in particular via our subcontractors operating in regulated sectors or covered by collective agreements. These initiatives reflect our ongoing commitment to promoting an inclusive, ethical working environment that respects the rights of all stakeholders.

4.11. Diversity [S1-9]

[DP 66]

Econocom is particularly attentive to gender equality within its workforce. Encouraging women to join a largely male-dominated industry, particularly through recruitment or speaking out in favour of gender equality, is a major priority for the group.

Econocom gives women and men the same opportunities (for example, access to training, career development, salary and access to positions of responsibility or Management).

Breakdown of Management by gender (full-time equivalent)	Men	Women
Number	81	19
Percentage (%)	81%	19%

Managers of P&Ls are included in the Management.

Women are often underrepresented in the digital sector.

The percentage of women in the digital market in France is 29% (1).

At Econocom, the proportion of women in digital-related roles is 18%. In other functions, women represent 48% of the workforce.

Despite a low representation of women in the workforce, we have 27% of women in management positions.

Econocom has implemented the following measures to boost the recruitment of women:

- Attracting and recruiting through retraining with the Manifesto: #ReconversionFemmesNumérique

The recruitment teams and the entire Econocom management team are already very actively looking to recruit women in so-called traditional sectors. The “Femmes du Digital” programme has therefore focused its actions on the encouraging women to retrain for digital jobs.

Econocom wanted to open up other avenues than the so-called "traditional" sectors to attract and recruit more women. With its experience in retraining, Econocom is a signatory of the #ReconversionFemmesNumérique Manifesto.

- Exaprobe: deployment of awareness-raising MOOCs for the recruitment of women in digital professions.

Breakdown of employees by age group (full-time equivalent)	Men	Women	Men	Women
< 30 years old	1,302	349	79%	21%
30/50 years old	3,537	1,220	74%	26%
> 50 years old	1,538	502	75%	25%
Total	6,376	2,070	75%	25%

(1) Employment Survey – Remuneration, Quadrat Numeum 2023.

4.12. Equal pay [S1-10]

[DP 69]

In accordance with European Directive 2022/2041 (8), the group is committed to ensuring a decent wage for its employees. For this reason, it plans to include, in the short term, a clear definition of a decent wage and a clear methodology to ensure its effectiveness in its social strategy. This indicator, which reflects our commitment to sustainable and inclusive performance, aims to ensure that remuneration allows each employee to:

- Cover basic needs: housing, food, health, education and transport
- Have the financial means to cover expenses beyond basic necessities

This definition takes into account local economic situations and variations in the cost of living in the different countries where we operate. It is aligned with the United Nations principles on human rights and fair working conditions.

The living wage is considered on the basis of the fixed salary only. A specific approach has been applied based on the data available by region:

• european countries:

The living wage was set at 50% of the national average gross annual wage, as defined by the aforementioned European Directive. The average wage is taken from data from the European Commission Eurostat, the body identified as a reference

value in the Directive. An exception was made for the Netherlands, where the unavailability of data means that this reference is based on data from OECD publications.

• non-European countries:

Where available, data from OECD publications were used to determine a living wage equivalent to 50% of the national average wage. In the absence of OECD data, guaranteed minimum wages reported by the ILO (International Labour Organisation) were used as a reference.

An additional check is made to ensure that this value is not lower than the legal or conventional minimum wage and that it is in line with the market wage level of the region when no minimum wage is applicable in the country (example Italy).

Beyond ensuring a decent salary, Econocom is working on creating a job reference system correlated with pay scales in order to ensure a salary aligned with the market for all employees.

Adequate salary	%
% of employees below decent wage	0.33%

The employees concerned are in Spain, on discontinued contracts intended to promote their professional reintegration. Their salaries are higher than the legal minimum but remain slightly below the decent wage, according to the aforementioned definition.

4.13. Social protection [S1-11]

[DP 74]

The Econocom group offers its employees quality social protection enabling them to cope with life's uncertainties.

It offers its employees effective schemes for health insurance and covering risks for incapacity, disability and death.

In France, illness, unemployment and retirement are covered by mandatory state systems. For pensions, Econocom and the employee contribute jointly to Social Security and to the Agirc Arrco private pension scheme. Other contributions also financed by Econocom and the employee guarantee that employees are covered in the event of unemployment or illness.

Internationally, all employees benefit from social protection.

The regimes applicable within each company are, for the most part, more advantageous than those provided for by the regulations in force.

These regimes are, most often, the subject of collective negotiations.

Temporary workers are covered by the social protection system set up within the agency that employs them. Service providers can subscribe to social protection

in addition to mandatory operating and professional liability insurance. The group takes this additional charge into account in the negotiated daily rates.

4.14. Disability [S1-12]

[DP 79] & [DP 80]

For several years, the Econocom group has been committed to a proactive approach for the benefit of people with disabilities.

Regulations in Europe vary from country to country, but we have set ourselves the target of 6% of disabled workers across the Group by 2028.

This indicator is calculated according to the terms of the DOETH in France. Also, in order to promote the work of senior citizens at the same time, we apply a multiplier coefficient of 1.5 for employees over 50 years old with a disability.

Persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which, when faced with various barriers, may limit their full and effective participation in society on an equal basis with others. Recognition of the status of disabled worker, however, depends on the applicable local regulations, which may be more restrictive, as they are limited to severe disabilities.

% of workers with disabilities (in number of employees)	Men	Women
Group	4.22%	5.77%

The average result is 4.60% for the Group.

4.15. Training and skills development [S1-I3]

The HR Department is developing a dynamic talent and career management policy. The group wants each employee to be able to develop and build their career by carrying out diverse and meaningful missions.

As part of their recruitment, new employees benefit from a personalised onboarding process. They are introduced to the teams and explained how the company operates and, more specifically, how their department operates.

In addition to this, new arrivals at Econocom Workplace Infrastructure Innovation participate in a national onboarding seminar called "Welcome Day". This day is an opportunity to learn about the group, its strategic objectives, its operations and the various professions and activities that make up Econocom.

Similarly, employees working at customer sites attend "Welcome Dates" which enable them to learn more about the organisation and operations of their agency. Onboarding afternoons are organised at the service centres every two weeks.

Attracting talent

2024

Number of group recruitments

1,984

Econocom has thus defined three priority areas of action to meet the expectations of candidates and employees:

- an increased presence on social networks, an effective medium for connecting candidates with employees, primarily aimed at the younger generations;
- strong use of the group's employee network to recruit more targeted profiles who share the company culture via a referral system including a bonus ;
- developing internal employee mobility. Econocom invites employees to express their mobility and career development aspirations during their appraisals. A job directory lists all the Group's business lines in France, as well as possible career paths.

In France, job openings are also published on the internal mobility portal and the Careers teams monitors internal applications, liaising with internal stakeholders (recruiters, resource managers, HR, managers, etc.) to ensure efficient processing of the applications, increased communication and cooperation between stakeholders and systematic communication to candidates. To best support employees, Econocom provides them with a Mobility Charter accessible on the Intranet to describe the internal mobility approach and process. An internal webinar on career development within the group was also offered to employees.

[\[DP 83b\]](#)

The Econocom Group supports career development by providing a wide range of training options.

Econocom’s concrete initiatives to enhance training are as follows:

- In France: the Human Resources department, in conjunction with Line Managers, studies training requests and draws up an annual skills development plan. In addition, the Human Resources department studies the level of skills assessed during the annual appraisals so that training needs can be identified, in order to develop each employee’s skills and fast-track employees identified as potential talents during the talent review.

Since 2023, e-learning licences have been granted to employees of the Services activity via the UDEMY platform. A mentoring programme was also rolled out in 2023 to promote our talents’ skills and boost their career development;

- Belgium: skills centres have been set up to develop employees’ expertise with an onboarding and follow-up programme;
- Morocco: an in-house training school has been set up a NEXTHINK skills centre is under development;
- Spain: development of a training management tool and UDEMY technical training.

Skills development	Men	Women
Average number of hours of training per employee	11	10

Outside Benelux, which does not have centralised monitoring of training hours.

[DP 83a]

Career management at Econocom follows a structured process, so that specific measures for incorporating, retaining and developing skills can be identified for the various employee profiles.

In France, appraisals are conducted once a year between employees and their Line Managers. They aim is to look back on the past year in terms of achievement of objectives and skills development.

The appraisal is also an opportunity to discuss promotion and training aspirations and review the employee’s career with Econocom.

Every year, a Talent review is also held to detect talent and potential and to define individual career development plans.

97.30% of employees are eligible for performance appraisals or talent reviews. These reviews are mandatory and occur at a multi-year frequency that varies depending on the country.

% of employee participation	Men	Women
Participation in performance evaluation and career interview	51.85%	55.17%

HR extracts and analyses data from interviews and talent reviews as a basis for salary reviews. The Econocom group's

compensation policy focuses on rewarding employee performance and skills.

4.16. Health and safety in the workplace [S1-14]

[DP 88a – DP 88e]

Health and Safety (full-time equivalent)	Number	%
Employees covered by a health system	8,362	99.0%
Deaths due to occupational causes	0	0.00%
Work accidents (including deaths)	121	1.4%
Work-related illnesses	61	0.00%
Number of days lost due to a work accident	3,962	0.1%

The risk of occupational accidents concerns everyone; thus, every two years, employees are trained in first aid and fire safety.

In France, a Health and Safety Manager is appointed to guarantee the safety of employees and is in charge of identifying the main risks and implementing corrective measures (making alterations to the premises, training, easily-accessible information sheets, etc.).

Econocom is implementing a number of health prevention actions. In 2024, Econocom has for example:

- for the third consecutive year helped fight breast cancer as part of the "Pink October" scheme and took part for the

first time in the "Movember" programme by expanding the initial breast cancer screening to general medical checkups for employees aged over 40;

- offered employees a hearing test;
- rolled out a flu vaccination campaign at its sites;
- organised a France-wide sports challenge during QVCT week;
- provided on-site gyms or Gymlib services to co-finance employees' sports memberships for Helis;
- raised employee awareness on health and safety through mandatory training and various campaigns.

4.17. Work-life balance [S1-15]

Quality of life in the workplace is paramount to Econocom, which is why it strives to ensure a good work-life balance for staff. Candidates and employees are increasingly attentive to this balance, which is a source of attractiveness and loyalty for candidates and employees.

The Happy@work label, awarded to Exaprobe with a score of 4.14/5 in 2023 and maintained in 2024, is a testament to employees' satisfaction with their working conditions, their quality of life at work and their work-life balance.

[DP 93a – DP 93b]

Employees benefit from maternity, paternity and parental leave, the conditions and length of which vary according to local regulations.

In France, there are also special leaves for personal events such as moving, birthdays, marriage, civil partnership, etc.

In Belgium, employees are covered, on the one hand, by statutory leave such as maternity, paternity, adoption leave, parental leave (reduction of working hours until the child is 12 years old) and leave for seriously ill children. In addition, the company has provided leave for urgent reasons which grants up to 10 days if the child is ill.

Special leave	Men	Women
% of eligible employees	99%	99%
% of beneficiaries	9%	13%

4.18. Remuneration indicators [S1-16]

[DP 97a]

The gender pay gap is defined as the difference between the average pay levels of women and men, expressed as a percentage of the average pay level of men.

According to the Numeum 2023 study, there is a 4.3% pay gap to the disadvantage of women in digital service companies in France. This is largely explained by the poor representation of women in high positions.

According to the International Labour Organisation, the pay gap is the result of the following factors:

- recruitment of women at lower wages;
- poor representation in influence networks;
- maternity and family obligations;
- women's reluctance to negotiate their salary.

All Human Resources teams are kept apprised of these issues through procedures summarising the findings, legal framework and tools to guarantee equal pay and also benefit from training on non-discrimination.

However, overall gaps do not mean that for equal positions and equal seniority, men and women are not paid fairly.

05 sustainability report

company employees [esrs s1]

Thus, Econocom, as part of its strategic plan for 2028, has committed to monitoring the pay gap between men and women using a detailed methodology, based on the French professional equality index, and is currently defining, locally, action plans to eliminate the pay gap between women and men.

This indicator is calculated on the basis of the average annual remuneration, i.e. the fixed remuneration as full-time equivalent and the variable elements actually paid during the reference year for employees on permanent contracts and fixed-term contracts present on December 31 of the reference year.

Gender pay gap	%
<i>Average salary of women compared to men</i>	96%

[DP 97b]

The ratio of annual total compensation between the highest paid employee and the median total compensation for all employees (excluding the highest paid employee) allows an estimation the pay gaps between employees and the Group's manager.

The reference scope is consolidated at Group level.

We use an external compensation benchmarking firm to help us prepare the

compensation scales for managers and employees in France, and we have also ensured that the compensation of managers is aligned with the market.

The raw data is available but does not reflect reality because Econocom operates in countries where there are large discrepancies in terms of purchasing power. An adjusted methodology is currently being defined in order to provide additional insights that are essential to contextualise and explain the indicator. We pledge to publish these indicators in the 2025 report.

Ratio of compensation of the highest paid employee to the median compensation of other employees	%
<i>Ratio</i>	Data reported in 2025

[DP 97c]

In France, the gender equality index calculated in 2024 for the year 2023 is 94/100. The 2025 index will be published on the website in March 2025.

This index is based on the calculation of four to five indicators, depending on the workforce of each company:

- gender pay gap;
- gap in individual pay rise rates between women and men;
- gap in promotion rates between women and men;
- percentage of employees returning from maternity leave who received a pay rise upon their return;
- number of employees of the under-represented sex among the ten employees receiving the highest salaries.

Aware of the importance of pay equity between men and women, the group has stepped up its efforts to reduce pay gaps.

Thus, by relying on the methodological bases of the "pay gap" indicator of the French index, the group has broadened its approach by developing an indicator allowing a comparative analysis of the pay gaps between genders in the different countries it operates in.

This approach, as part of its overall social responsibility approach, is accompanied by ambitious quantified objectives included in the group's strategic plan, which aims to achieve a minimum score of 90/100 on this index (the details of the calculation methodology are explained in **DP 44 of SI-5** of the standard).

This rate reflects the group's determination to ensure a fair, respectful and inclusive professional environment. These strategic KPIs are now pillars of Econocom's governance and its commitment to sustainable and ethical growth.

[DP 98]

	Gender pay gap (pay gap)
France	106.7%*
Benelux	98.2%
Southern Europe	83.2%
Northern and Eastern Europe and the Americas	56.1%

* in other words, women are paid 6.78% more than men in France

This indicator is calculated on the basis of the theoretical fixed and variable salaries paid over the year to employees present on permanent and fixed-term contracts as of December 31, 2024. Analysing the salary on a full-time basis offsets the effects of absences, arrivals, departures, etc. Nevertheless, we are comparing men and women performing functions for which the market salary is not identical. In addition, levels of responsibility and seniority are not taken into account in this calculation. Concerning Northern Europe, this scope represents fewer than 300 employees and the proportion of women in management or sales positions is 7% compared to 42% for men.

The calculation methodology is the average remuneration of women over the average remuneration of men by geographical area.

4.19. Human rights incidents and complaints [S1-17]

[DP 102]

The Group is committed to fully respecting the United Nations Guiding Principles on Business and Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. These international frameworks provide guidelines for implementing responsible and ethical practices, while ensuring a working environment that respects everyone's rights.

Our commitment to these universal principles also translates into concrete actions to raise awareness, train and support our teams on these issues, while enshrining these values in our strategy and our corporate culture.

[DP 103a -DP 103c]

Incidents of discrimination (including harassment)	
Number of incidents of harassment or discrimination	2
Number of complaints filed	11
Number of complaints to National Contact Points	0
Total fines, penalties and compensations	0

Eleven complaints were filed by employees across the Group via the available areas. Following investigation, two incidents were proven and the employees left the company.

[DP 103c]

No fines were issued.

[DP 103d]

In this context, we have set up several areas for reporting any incident or complaint related to human rights, in order to ensure rapid, confidential management in accordance with international best practices:

- A dedicated representative in the Social and Economic Committee (SEC): This representative acts as a direct point of contact for employees, guaranteeing attentive listening and effective reporting of concerns;

- An information process via managers and HR: Employees can report their concerns to their manager or HR contact, who ensure that these subjects are handled with complete transparency and confidentiality;
- Secure whistleblowing platform of the Ethics Committee: This digital tool guarantees confidential and anonymous reporting, offering everyone the possibility to report incidents or submit complaints securely and with appropriate follow-up.

These systems reflect our desire to provide a working environment where every employee feels heard and protected. In addition, they are part of our proactive approach to prevent and manage any potential breach of fundamental rights.

[DP 104a – DP 104b]

Human Rights⁽¹⁾

Number of breaches of employee rights	0
Where applicable, context necessary for understanding the data	0
Total fines, penalties and compensations	0

(1) This includes an indication of the number of cases of non-compliance with the UN Guiding Principles, the ILO Declaration or the OECD Guidelines.

This data was consolidated from two sources: cases reported via the whistleblowing platform and declarations from local HR Directors at the end of 2024.

5. Value chain workers [ESRS S2]

5.1. Stakeholder interests and views [ESRS 2 SBM 2]

[DP 9]

When carrying out the sustainability due diligence process, we took into account (see SBM 2 of ESRS 2):

- Firstly, a panel of **internal representatives** of the stakeholders in our value chain;
- Secondly, we were able to conduct interviews with **key external stakeholders** for the group (suppliers, customers, banks) to take their interests and points of view into account in our analysis.

5.2. Material Impacts, Risks and Opportunities as well as their interactions with Econocom's strategy and economic model [ESRS 2 SBM 3]

[DP 10a]

As explained and illustrated in ESRS IRO-1, Econocom has implemented a methodology common to all subjects covered in all standards for the establishment of **material** impacts, risks and opportunities. The details of the methodology are presented in the general disclosure standard ESRS 2.

Risks of breaches of human rights and respect for working conditions for the

group come mainly from its suppliers and subcontractors. This is why, as part of our purchasing practices, we ask tier-1 suppliers (considered strategic in relation to the volume of activity generated) to comply with our ethical and social standards.

We have defined our HR standards according to European regulations and we apply them everywhere. Econocom's staff essentially represents a qualified population for which HR management expectations are particularly high.

[DP 11]

Under the double materiality matrix, the scope and position of workers within the group's value chain are presented in the paragraph below:

[DP 11a]

Hardware purchases are made from wholesalers/resellers or hardware manufacturers/software vendors recognised on the market. The group sells all the major international brands (Dell, HP, Lenovo, Microsoft, etc.). We also purchase our services (e.g., subcontracting) from local providers.

Furthermore, on the manufacturers' side, factories/stocks are set up, particularly in Europe (Intel, Lenovo, etc.), to ensure the best possible quality supply of goods.

Regarding our hardware and software supply chain:

- **purchases:** 50 to 60% from wholesalers/resellers, and 40 to 50% from hardware manufacturers and software vendors directly (order and invoicing);

- **deliveries:** either in wholesale warehouses, or independent (logistics providers or service centres), or direct customers.

Workers subjected to material impacts can be categorised as follows:

- **on site:** service providers (events, building maintenance, etc.);
- **upstream of the value chain:** employees of suppliers and subcontractors: banks ⁽¹⁾, wholesalers, resellers and manufacturers;
- **downstream of the value chain:** freight company employees for supply.

Particularly vulnerable workers in our value chain are trade unionists, women ⁽²⁾, young workers (including child labour), temporary workers, migrant workers and workers with disabilities.

[\[DP 11b\]](#)

Econocom mainly sources its supplies from suppliers and sells to customers located on the European continent, where social regulations and labour law go beyond the standards for respecting for human rights. The risks in terms of working conditions and human rights are mainly upstream of its value chain. More specifically in Asia, which is the geographical area likely to present a high risk of child labour, forced or compulsory labour.

[\[DP 11d\]](#)

The materiality analysis carried out, as well as the various impacts of Econocom presented in the double materiality matrix of ESRS 2, concluded that the group could potentially materially impact workers in its value chain in a negative manner.

[\[DP 11e\]](#)

The materiality analysis carried out concluded that only material negative impacts were highlighted for the group.

This is explained as follows:

This duty of vigilance is reinforced upstream of our value chain with our main IT manufacturers and more specifically, during the **manufacturing phase of IT equipment** (identified as at risk). It should be remembered that, given its position as a distributor or lessor on the market, the areas identified as critical in Econocom's value chain are located more at the level of tier-2 or even tier-3 suppliers. Consequently, the impact on the group is limited when a risk materialises.

In practice, Econocom has carried out the **rating of these risks and opportunities (RO)** with respect to workers in the value chain. The scope and irreversible nature of the RO were rated at the maximum given the subjects raised. However, in a logic of financial materiality, the **probability of occurrence of the RO was rated very low**, considering that these ROs had very little chance of impacting the group's financial flows.

(1) The TMF activity operates mainly through external refinancing from banking institutions.

(2) Depending on the geographical areas

[DP 12]

By taking the representation of our workers in our value chain illustrated in **DP11a** of the standard, the following mapping emerged:

Vulnerable workers	Upstream (rank 2/3)	Upstream (rank 1)	On site	Downstream
Children	X			
Young workers	X	X		
Women ⁽¹⁾	X			
Trade unionists	X			
Temporary workers	X	X		
Migrant workers	X			

(1) See footnote comments

[DP 13]

As explained in DP 11e, Econocom did not identify any material risks or opportunities in its materiality analysis. However, through its commitments to its value chain, Econocom takes full measure of the risks affecting workers in this chain.

5.3. Value Chain Worker Policies [DR S2-1]

5.3.1. POLICIES ON THE MANAGEMENT OF IROS WITH RESPECT TO HUMAN RIGHTS AMONG SUPPLIERS AND THEIR SUBCONTRACTORS

[DP 16 ; DP 17 ; DP 17a ; DP 17b]

The group's policy on respect for human rights among workers in our value chain is based on our Code of Conduct for External Affairs covering the following subjects: signing the Code of Conduct and Responsible Purchasing Charter for strategic suppliers.

- Expected relationships with public authorities, customers and partners;

- Main risk situations (e.g.: Corruption and influence peddling);
- the fight against money laundering;
- data confidentiality;
- the fight against discrimination;
- respect for the environment;
- the fight against harassment (moral and sexual);
- the use of Econocom group resources;
- Econocom group whistleblowing system;
- sanctions for breaches of the Code of Conduct.

[DP 17c]

In order to protect itself from the risk of non-compliance with human rights in its value chain, the Econocom Group has implemented, in particular via its whistleblowing platform, compensation measures and disciplinary/punitive sanctions in order to ensure that, when the alleged breach(es) of human rights are confirmed, or not, by the relevant evidence, they do not reoccur. This system applies to workers in our value chain.

5.3.2. POLICIES ON THE MANAGEMENT OF IROS WITH RESPECT TO THE WORKING CONDITIONS OF SUPPLIERS AND THEIR SUBCONTRACTORS

[DP 18]

The Econocom group is committed to **respecting the working conditions of workers in the value chain** and the principles of the fundamental conventions of the International Labour Organisation (ILO).

To that end, the Econocom group has established a Responsible Purchasing Charter, which is based on the ten principles of the United Nations Global Compact. It is aimed at strategic suppliers, who are required to sign it to confirm their commitment to respect it.

This Charter calls for commitments in the following manner:

- complying with the laws in force in terms of labour rights in the countries in which it operates;
- paying at least the legal minimum reference wage, without any discrimination;
- complying with the regulations in force in terms of working hours and weekly rest;
- respecting freedom of association and the right to organise and bargain collectively as defined by ILO conventions;
- prohibiting the use of forced labour or labour under the threat of any penalty;
- prohibiting any work by persons who are not of the minimum age required by law (except in specific cases permitted by local law and which do not endanger the health and safety of the person).

On the Health and Safety side, we require the supplier to:

- undertakes to ensure the safety of the people and property for which it is responsible in the course of its activity;
- ensure that working conditions and environment meet the standards and rules applicable to the company.

[DP 19]

Econocom expects the supplier to also comply with applicable local and international regulations in connection with the **fundamental ILO conventions**. Compliance with labour law is one of the key themes shared within our Charter (described above). These prerequisites are essential for collaboration between Econocom, its suppliers and their subcontractors. The Group's Responsible Purchasing Charter reinforces the commitments we expect from our suppliers as well as the commitments we make to them.

5.4. Process of dialogue and interaction with workers in the value chain and/or their representatives [S2-2]

[DP 22]

The Econocom group has deployed a comprehensive process, to process and take into account the points of view of workers in the value chain.

- Whistleblowing system

Econocom also wishes to strengthen interaction with workers in its value chain through these additional processes, with respect to human rights and working conditions. These processes are as follows:

- ▶ Data Legal Drive device (detailed further below in the Actions and resources concerning value chain worker policies section S2-4),
- ▶ Responsible Purchasing Charter (detailed below in the Actions and resources section with respect to policies on value chain workers S2-4).

Today these contractual clauses do not allow us to interact directly with workers, legitimate representatives or credible agents. However, we have deployed action plans in the actions and resources section (S2-4).

[\[DP 22a – DP 22e\]](#)

The ethics whistleblowing system is publicly accessible, and by extension to workers in the Econocom value chain. In addition, workers in the value chain have a means of interacting with Econocom via a page dedicated to the whistleblowing system:

<https://report.whistleb.com/fr/econocom>.

To date, 0 incidents have been reported with respect to workers in the value chain. In the same way as the ethical whistleblowing explained in G1-1 [See G1-1], the Ethics Committee is responsible for supervising the procedures and modalities with respect to the ethical whistleblowing system. To date, we are not aware of any agreements concluded with international trade union federations regarding respect for human rights and how they can make workers' point of view known. The group's commitment to workers in our value chain is therefore assessed using the whistleblowing system. In addition, the additional drivers mentioned above [DP 22] allow us to specify how the effectiveness of our engagement with workers is assessed.

[\[DP 23\]](#)

As things stand, we are unable to communicate the measures taken to obtain the views of workers who may be particularly vulnerable or to disclose the information required regarding dialogue with workers in the value chain/and/or their representatives.

[\[DP 24\]](#)

Econocom, through its whistleblowing system and these additional processes, is committed to the workers in its value chain. However, the group hopes that the additional processes explained in [DP 22] will strengthen interactions directly with the workers in our value chain and not just through contractual clauses.

5.5. Processes and communication channels to address negative impacts and enable value chain workers to raise concerns [S2-3]

[\[DP 27a ; DP 27b ; DP 27c ; DP 27d\]](#)

The unique mechanism that allows Econocom to interact directly with workers in the value chain helps to address the negative impacts described in the double materiality analysis. Indeed, the forms of negative impacts that can occur to workers in our value chain concern both:

- breaches of human rights of the worker in the value chain by his/her direct employer or a third party;
- damage to the working conditions of the worker in the value chain by the direct employer or a third party.

In the event that a worker in the Econocom value chain suffers a negative impact, there is a specific ethics whistleblowing system for quickly reporting any breach of the general agreements previously provided for.

In theory, the process for reporting and monitoring alerts is as follows:

During the investigation and processing procedure of the alert issued, the workers in the value chain concerned are consulted throughout the procedure, thereby ensuring that they are kept fully informed until the investigation is completed. (This also allows us to measure the degree of satisfaction with the process and the results provided).

As explained above (in DP 22), we have not received any ethical alerts concerning workers in our value chain. Consequently, the group does not yet have any feedback on how the system is working.

[\[DP 28\]](#)

Although value chain workers have access to the ethical whistleblowing system, as explained in G1-1 within the Code of Conduct for External Affairs, we need to ensure greater awareness of the system among value chain workers.

[\[DP 29\]](#)

Econocom, through its whistleblowing system and these additional processes, is committed to the workers in its value chain. However, the group hopes that the additional drivers explained in [DP22] will strengthen interactions directly with the workers in our value chain and not just through contractual clauses.

5.6. Actions and resources for value chain worker policies [S2-4]

[\[DP 30\]](#)

The actions and/or approaches that have been implemented at Econocom to address the S1-1 policies with respect to the negative impacts described in the materiality matrix are as follows:

[\[DP 32a ; DP 32b\]](#)

5.6.1. ACTIONS AND RESOURCES USED IN THE PREVENTION AND MITIGATION OF NEGATIVE EFFECTS ON RESPECT FOR HUMAN RIGHTS

As explained in [S2-1] on human rights policies, actions seeking to prevent and mitigate potential negative effects on respect for human rights are as follows:

- whistleblowing system to directly identify negative effects and to process reports publicly accessible by all of our stakeholders.

This system ensures the protection of whistleblowers for workers in our value chain (see section G1-1);

- investigation and alert processing procedure.
This procedure details the procedures for launching and conducting internal investigations; it also specifies the process for handling proven human rights breaches.

5.6.2. ACTIONS AND RESOURCES USED IN THE PREVENTION AND MITIGATION OF NEGATIVE EFFECTS ON COMPLIANCE WITH WORKING CONDITIONS

The whistleblowing system is completed by the following additional measures which mainly deal with working conditions:

• Data Legal Drive Tool

In order to address the issue of working conditions for suppliers and their subcontractors, Econocom also rolled out group-wide the multilingual Data Legal Drive tool. This allows the group to send a questionnaire directly to our suppliers and ensure compliance with the obligations of working conditions and human rights. This questionnaire includes questions with respect to human rights, security, GDPR, Compliance, employee health and diversity and inclusion. In addition, as explained above, the Responsible Purchasing Charter, sent to these same suppliers, specifies that they must respect the working conditions and human rights of workers.

The Supplier Evaluation Procedure describes the process for existing and new suppliers.

The Data Legal Drive tool was thus built on this basis and strengthens interaction with workers in our value chain in order to prevent or mitigate potential negative effects on working conditions.

The whistleblowing system is also accessible via the questionnaire in the Data Legal Drive tool, so that workers in our value chain are aware of the reporting possibilities in this system.

• Responsible Purchasing Charter

The Responsible Purchasing Charter is an internal document and is not intended to be made public. However, the commitments described are detailed in accordance with the **business conduct standard** (G1).

[\[DP 32 d\]](#)

The Econocom group's whistleblowing mechanism allows potential alerts with respect to human rights and/or working conditions to be reported.

In the event that a serious alert is raised, the Ethics Committee, which is always separate from the management chain involved in the matter, examines the case and, if it considers that an investigation should be opened, it defines its scope and course.

[\[DP 33a\]](#)

The description of the processes by which Econocom determines the necessary and appropriate measures in response to a particular actual or potential negative impact on venture capital workers is described in [DP 32a].

[\[DP 33b\]](#)

The Econocom Group Purchasing Department, with the support of the CSR Department, has strengthened its impact on workers in the value chain with the aim of quantifying the results of its partners, subcontractors and suppliers from a CSR, GDPR and Compliance perspective.

Below are the monitoring indicators for the Responsible Purchasing policy:

Responsible purchasing	2024
Percentage of suppliers of purchases of Services activities who have signed the Responsible Purchasing Charter/Code of Conduct among the 20 largest suppliers	100%

[DP 35]

The ongoing initiatives through the Data Legal Drive tool and associated procedures strengthens the interaction we wish to have with our suppliers and by extension with the workers in our value chain.

This tool complements the working groups initiated with buyers, by country and by activity:

- **In France:** The working groups were held with the Purchasing Directors of the group's various activities in the last quarter of 2024. These working groups focused on:

- ▶ ensuring that our activities (in the business) address the issues with respect to non-compliance with human rights and/or working conditions for workers in our value chain and that they limit the resulting impacts. For example, the leasing activity (TMF) operates thanks to a large proportion of external refinancing from credit institutions. In essence, the fact that banks give their approval, after analysis, to take the risk associated with asset leasing contracts with customers, justifies vigilance and by extension the mitigation of the negative impacts that the Econocom group effects on its value chain;

- **internationally:**

- ▶ focus groups for countries outside France dedicated to addressing

potential negative impacts identified among workers in our value chain across all of our activities (EPS, TMF ⁽¹⁾and Services) will be launched in 2025,

- ▶ in the last quarter of 2024, questionnaires were sent to all the group's countries to outline a scope of analysis and initiate contact with buyers on the issues of the S2 standard.

[DP 36]

To date, no serious human rights incidents have been identified upstream or downstream of our value chain.

[DP 38]

The description of the resources allocated to the analysis of material impacts is presented in the general information standard in the following subsection (**ESRS 2**).

5.7. Targets established in relation to actions [S2-5]

[DP 39 ; DP 41 ; DP 42]

To date, the Econocom group has neither developed precise targets and/or timelines, nor involved stakeholders in the setting of targets; in order to address actions with respect to the negative impacts of workers in its value chain.

(1) The explanation given for the TMF activity will be substantially the same for other countries because the activity is the same there (apart from certain characteristics specific to the assets leased and the types of contracts).

6. Consumers and end users [ESRS S4]

6.1. Stakeholder interests and views [ESRS 2 SBM 2]

[DP 8]

When carrying out the sustainability due diligence process, we took into account (refer to stakeholder consultation described in ESRS 2):

- firstly; a panel of **internal representatives** of our stakeholders in our value chain (those who have the most insights on our customers and other end users);
- Secondly, we were able to conduct interviews with key external stakeholders for the group (suppliers, customers, banks) to take their interests and points of view into account in our analysis.

6.2. Material Impacts, Risks and Opportunities and their interactions with Econocom's strategy and business model [ESRS 2 SBM 3]

[DP 9]

The material risks and opportunities with respect to consumers and end users which may influence and/or benefit the group concern in particular the subjects of

personal data protection or customer awareness of CSR issues or even good commercial practices.

Econocom also has a material impact on its consumers and end users concerning the integration of innovations in its products or services (notably with the development of artificial intelligence).

[DP 10 – DP 11 & DP 12]

Other regulatory information required by the regulations will require a more in-depth gap analysis⁽¹⁾, which will be carried out in 2025 by Econocom.

6.3. Policies with respect to consumers and end users [DR S4-1]

[DP 15]

The Group has not yet defined the policies it wishes to implement to address the material impacts, risks and opportunities with respect to consumers and end users. As a result, no remedial measures, action plans or targets have currently been defined for these impacts, risks and opportunities.

However, with regard to cybersecurity and data protection, the group specified certain elements in its "Impact Report" without being able to ensure whether they meet the requirements of the ESRS S4 standard.

(1) Gap analysis here means studying compliance discrepancies on the data points of a standard. In other words, conducting a more in-depth study to find out what currently exists and what the group needs to do.

6.4. Process of dialogue and interaction with consumers and end users [S4-2]

[DP 20]

Econocom has not yet established any mechanisms to engage in dialogue with consumers and/or end users. However, the group plans to implement resources and actions in this area in 2025.

6.5. Processes and communication channels to address negative impacts [S4-3]

[DP 25]

Econocom has not yet established any mechanisms and/or communication channels to address negative impacts with consumers and/or end users. However, the group plans to implement resources and actions in this area in 2025.

6.6. Actions et resources related to consumer and end-user policies [S4-4]

[DP 28]

As explained in S4 – 1, if the group has not defined a policy aligned with the data points of S4, then we cannot define the associated action plans. However, the group pledges to define them in 2025.

6.7. Targets established in relation to actions [S4-5]

[DP 38]

To date, the Econocom group has not developed specific targets and timelines to address actions with respect to the negative impacts of workers in its value chain. However, the group plans to implement resources in this area in 2025.

7. Business Conduct [ESRS G1]

7.1. ESRS 2 General information standard data [GOV-1 & IRO-1]

[DP 5a]

As previously discussed in the general disclosure standard ESRS2GOV-1, the role of administrative oversight and decision-making bodies with respect to the conduct of business is described in the chapter "Corporate Governance"

[DP 5b]

In 2019, Econocom appointed an Ethics Committee composed of members chosen for their sensitivity and experience in the field of compliance and business ethics. This Committee is responsible for:

- ethics-related issues;
- processing and monitoring reports received via the whistleblowing system;
- conflicts of interest;
- the proper application of internal procedures and ethical principles by all people and at all levels.

The Ethics Committee is always separate from the Management chain involved in the case.

[DP 6]

The process implemented to identify the impacts, risks and opportunities with respect to the conduct of business (described in the general information standard ESRS 2 IRO -1 – DP 53a to DP 53g) has revealed that the group:

- could experience damage to its reputation in the event of non-compliance with its internal procedures and rules with respect to the anti-corruption compliance system;
- could have a significant impact (impact identified in accordance with the matrix described in SBM 3 of ESRS 2) on its suppliers, in the event of non-compliance with payment deadlines, and specifically where small and mid-sized companies are concerned.

Econocom is exposed to a supply risk due to its dependence on certain products in its value chain. Nevertheless, Econocom is part of solid long-term partnerships with leading suppliers (e.g. hardware manufacturers);

- the Econocom Group's involvement in ESG issues and the deployment of relevant correlative actions could result in the allocation of funding to support its activity.

7.2. Vision and corporate culture [G1-1]

[DP 10a]

Econocom has several mechanisms to identify, investigate and report behaviour that is in breach of its internal code of conduct and the various charters signed and implemented by the group. These mechanisms (Responsible Purchasing Charter, Data Legal Drive System, Whistleblowing System) are explained in DR S1-1 and S2-2.

The Econocom group is committed to ethics and integrity at all levels of the organisation.

- Respect for human rights;
- Compliance with labour law;
- Fight against corruption;
- Fight against influence peddling;
- Environmental protection.

It also ensures compliance with laws and regulations concerning health and safety at work.

Econocom decided to unite all the people in the Group through a Code of Business Conduct. It sets out the conduct to be adopted to combat corruption and influence peddling. This Code, associated with a set of procedures and policies dealing with associated ethical issues (gifts and invitations, conflicts of interest, etc.), is based on a principle of zero tolerance for corruption.

The Code of Business Conduct, together with the associated procedures and policies, are the reference documents in terms of ethics. These elements are available in the main languages of the group and apply without exception to all employees of the group, including agents.

The Company's Code of Conduct describes the systems for preventing, detecting and handling allegations or incidents of corruption. These procedures include preventive measures, including clear policies, regular training and rigorous internal controls.

[DP 10b]

We have implemented anti-corruption policies. In France, the policies in place comply with the requirements of the Sapin

II Law. Other countries in which the Group is present has a code of ethics and certain procedures (reporting incidents, gifts and invitations, etc.) applicable at Group level, in addition to local anti-corruption systems.

[DP 10c]

Any author of an alert ⁽¹⁾ is protected, even if the facts reported are ultimately not proven. A whistleblower must:

- **be a natural person:** consequently, a legal entity (example: association, professional union, etc.) cannot be considered a whistleblower;
- **report or disclose information without direct financial compensation;**
- **be in good faith:** they must not be motivated by an intention to harm;

The alert relates to facts which have occurred or are very likely to occur in the entity concerned.

The information must have been obtained in the course of their professional activities. **If it was not obtained in the course of their professional activities, the whistleblower must have had personal knowledge of it.**

If the whistleblower's alert meets these criteria, he/she will receive the following guarantees:

- the absence of reprisals by the Econocom group or threats or attempts to resort to such measures as suspension, layoff, dismissal, demotion or refusal of promotion, etc.;
- the confidentiality of their identity and the facts reported.

(1) The person must be a whistleblower as defined by the Sapin II law.

Any person who believes they are the subject of reprisals for making a report or participating in its processing may report their case to the Ethics Committee. The identity of the whistleblower cannot be divulged to the person about whom the alert was made, unless the whistleblower agrees. It is forbidden to obstruct an alert: anyone who prevents a whistleblower from reporting an incident may face disciplinary and criminal sanctions.

On the other hand, any abuse of the system or slanderous reports may expose the author to disciplinary and legal proceedings.

In addition, the Econocom Group has established a structured process for reporting results to the administrative, management and supervisory bodies through an Ethics Committee. This process ensures transparency and accountability of operations and involves systematic documentation of results, including the results of investigations, measures taken and any necessary recommendations.

[DP 10e]

In addition to the Code of Business Conduct, the Econocom group has two procedures for managing incidents:

- ethical whistleblowing system;
- Procedure for investigating and handling breaches. This procedure details the procedures for launching and conducting internal investigations; it also specifies the process for handling proven breaches. It is also used in the event of suspicions of corruption independent of an alert (e.g., following an Internal Audit, an acquisition audit, legal proceedings, a regulatory control, etc.).

To strengthen its policy of vigilance with respect to ethical risks, the Econocom group has a whistleblowing platform. This system is used for collecting and processing reports with respect to the existence of situations in breach of the group's Code of Business Conduct and/or the regulations applicable to the group (in cases of corruption/fraud, etc.).

This whistleblowing system is available to anyone working within the Econocom group (managers, employees, temporary workers, interns, etc.), but also to any external third party in business relations with the group. It is available in several languages including French, English, Spanish and Italian, 24/7. The platform is secure, with an encrypted, password-protected reporting process.

This system meets the requirements of the Sapin II Law and other European regulations. All reports received through the platform are subject to review and monitoring by the Ethics Committee. These essentially focus on two main themes: (i) conflicts of interest and (ii) social responsibility and human rights.

If the alert is admissible and if the Ethics Committee opens an internal investigation, the means allocated to the investigation are defined in particular according to the following criteria:

- the relevance of the alert and its potential recurrence;
- the seriousness of the facts;
- possible negative consequences;
- the amounts involved;
- the threat that the facts pose to the physical or psychological integrity of a person, etc.

The main objective of the investigation is to establish the veracity of the facts reported. The question is whether or not the act is in breach of the Group’s Code of Business Conduct and/or the regulations applicable to the Group?

The length of the investigation and the resources allocated depend on the complexity of the case, the seriousness of the facts and the initial results of the investigation.

The Group’s General Management is informed of the opening and progress of the investigation, especially if the case is sensitive ⁽¹⁾. The Ethics Committee (compliance, HR, Internal Audit, etc.) appoints the person(s) who will lead the investigation. When several people are involved in an investigation, a manager is appointed.

These persons must be unrelated to the offences reported and qualified to conduct the necessary investigations. They may be employees or experts from outside the Group.

They must collect, store and secure the relevant evidence to confirm, or not, the alleged breach(es). In this capacity, they may conduct interviews, collect evidence, etc.

The role of the investigation manager is to conduct the investigation and, where appropriate, coordinate the work of specialists. For each investigation, the role and responsibilities assigned are specified.

If national authorities are to investigate the alleged breach, the internal investigating officer shall liaise and cooperate with them.

As part of the alert processing, internal specialists may also be called upon (example: the IT Director).

In 2024, the platform recorded one alert. It did not result in any lawsuits or prosecutions.

The of the alerts: business ethics

NB: the “social responsibility and human rights” category includes alerts dealing with: discrimination, harassment and health & safety.

[\[DP 10g\]](#)

We also provide online training courses for all employees on the topics of compliance and the fight against corruption. These courses are an addition to the Group’s extensive set of procedures and controls to ensure transparency and ethical behaviour.

	2023	2024
Percentage of training on ethics	68%	71%

There has been a 3-point increase in anti-corruption training.

(1) Unless it is challenged.

[\[DP 10h\]](#)

The Econocom group also drew up in 2024 a map of corruption and influence peddling risks for its French entities, which led to the identification of its major risks and the establishment of action plans. As part of the risk mapping, particular attention must be paid to the monitoring of sales agents, subcontractors providing intellectual services, and equipment loaned to customers. Stricter internal controls, particularly level two, are also a necessary part of a continuous improvement approach.

7.3. Supplier Relationship Management [G1-2]

A partner is any person, group, local authority, organisation or entity with which the Group associates or partners to carry out a joint project. A supplier is a partner from which the Group purchases goods and services of any kind that are necessary for its business (for its own needs or those of its customers). In the rest of this section, commercial partners and suppliers in business relationships with the Econocom Group will be jointly referred to as “partners”.

[\[DP 14\]](#)

Econocom strives to respect supplier payment deadlines set by the regulations of the countries in which its subsidiaries operate, starting with France (e.g., 45-day deadline for intercompany billing payment deadlines).

[\[DP 15a\]](#)

We expect integrity and compliance from our partners. They must comply with the anti-corruption and fraud legislation in force in their countries. It is also essential

that they share the group’s main principles on these subjects. In addition, the greatest vigilance is required of employees and agents during the three key phases of the relationship with partners:

- during the selection phase: select suppliers and subcontractors, according to objective criteria (quality, price, meeting deadlines, absence of conflicts of interest, social, and environmental concerns), by encouraging competition and respecting the Responsible Purchasing Charter. In accordance with applicable laws, we also endeavour to verify the integrity of the third party before entering into a contractual relationship (application of the third party assessment procedure in force at the Econocom group in France which identifies third parties who should undergo checks in accordance with the risk mapping carried out);
- contracting: formalise and conclude purchasing and supply contracts and associated commercial transactions (taking and receiving orders, invoice checks, invoice payments, possible disputes) incorporating the Code of Business Conduct and/or the Responsible Purchasing Charter;
- execution of the contract: pay for the products and services delivered/performed in accordance with the provisions of the signed contract.

The Econocom group has thus established a Responsible Purchasing Charter, which is based on the ten principles of the United Nations Global Compact. It is aimed at strategic suppliers who are required to sign it to confirm their commitment to comply with it (the key principles are defined more precisely in the standard concerning workers in our value chain.

For certain subsidiaries, we have also established specific contractual clauses. They allow us to better ensure compliance with this Responsible Purchasing Charter and the Econocom group's Business Code of Conduct.

The Econocom Group pays particular attention in the event of the use of intermediaries and agents. The involvement of a third party in a transaction can sometimes conceal an undue advantage (for example, a commission hidden by over-invoicing or slush funds to pay bribes), particularly when securing international contracts. Payments made to intermediaries may conceal a purpose that amounts to indirect corruption, for influencing or rewarding preferential treatment, or the abuse of a function or activity.

The Econocom Group prohibits these practices. They seriously damage the Group's reputation and make it criminally liable. When in doubt, employees must contact their Line Manager or the Ethics Committee.

[\[DP 15b\]](#)

The third-party assessment procedure in force within the Econocom Group (described in data point 15a) also focuses on social and/or environmental factors.

The Econocom Group's Purchasing Department has also reinforced this approach by sending out a CSR self-assessment questionnaire with the aim of quantifying the results of its partners from a social and environmental perspective (provided in the appendix to the Responsible Purchasing Charter).

7.4. Prevention and fight against corruption and bribery [G1-3]

[\[DP 18a\]](#)

Corruption and influence peddling are serious criminal offences which carry significant risks:

- criminal prosecutions (fines, imprisonment) applicable to individuals or legal entities;
- disciplinary sanctions (dismissal of the person who committed the offence);
- damage to the image, reputation and credibility of the Econocom Group.

The Econocom Group has a **zero-tolerance approach to acts of corruption and influence peddling** in the conduct of its business.

In addition, in our approach to combating corruption, we consider that facilitation payments, while not strictly speaking bribes, are nevertheless considered corruption. The Group therefore prohibits any facilitation payment, made directly or not, irrespective of the reasons and amounts, and even if they are authorised by local legislation. Its employees, agents, business partners must strictly abide by this rule.

[\[DP 18b & DP 18c\]](#)

Any employee who suspects a case of corruption is required to notify their Line Manager, the relevant departments (Legal or Human Resources) or the Ethics Committee. Alternatively, they can raise an alert via the whistleblowing platform. Any incident reported via the platform deemed admissible is subject to an internal investigation conducted by an investigation group under the supervision of the Ethics Committee. Proven breaches and appropriate sanctions are reported to the Group's General Management.

In addition, to justify the independence of the investigators and the Ethics Committee, the operation of the platform requires that the investigations are carried out (internally) by people who are chosen for their experience and their competence with regard to the nature of the alert. The procedure applicable to the Econocom group specifies that they may, in the event of doubt about their impartiality or in the presence of a conflict of interest, be removed from the investigation (decision taken by the Ethics Committee). They may also voluntarily withdraw due to their close proximity to the people concerned by the investigation. They remain in all circumstances bound by the most absolute confidentiality, a duty of impartiality and loyalty, and must act in compliance with the applicable regulations.

Given the sensitivity of the alert raised and/or its complexity, the investigation may also be entrusted to an external lawyer recognised for their expertise in this area.

The details of the operation of the ethical whistleblowing platform are explained in [DP 10e] of the standard.

According to Transparency International's ratings, the group's corruption risk remains limited. Some territories in which we operate (Morocco, Mexico and Eastern Europe) scored lower in terms of corruption, but the Group's branches in these countries are very small, and to date no reports have been made about these countries.

The alerts received are processed in accordance with internal processes regardless of the classification of the country in question.

[\[DP 20\]](#)

The group has implemented internal training to communicate to the relevant parties the implications of cases of corruption (see [DP 10g] of G1-1). This is an awareness programme consisting of videos followed by a question and answer session and a case study illustrating seven corruption situations, for a total duration of approximately 30 minutes. It is aimed at all Econocom Group employees (France and international). To date, the completion rate is 71% (regular reminders are sent).

[\[DP 21b & DP21c\]](#)

Following the risk mapping carried out in 2024, a special training programme will be rolled out in 2025 aimed at people exposed to the risks identified.

7.5. Incidents of corruption or bribery [G1-4]

[\[DP 24a\]](#)

To date, the Econocom group has not been subject to any fines or convictions for breaches of corruption regulations.

[\[DP 24b\]](#)

In the event of a breach of the Econocom group's ethical rules, a reminder of the applicable rules is provided for the populations at risk. Depending on the seriousness of the facts, disciplinary sanctions may be applied by the Human Resources Department.

[\[DP 26\]](#)

To date, the Econocom group has not been subject to any sanctions for breaches of corruption regulations with partners in its value chain.

7.6. Political influences and lobbying activity [G1-5]

The double materiality assessment did not reveal this disclosure requirement as relevant to Econocom.

7.7. Payment practices [G1-6]

[\[DP 33a\]](#)

The supplier payment terms observed vary between 35 and 45 days. Econocom strives to comply with the supplier payment terms set by the regulations of the countries in which its subsidiaries operate, starting with France (e.g., 45-day period for intercompany payment terms). The average payment period for Econocom suppliers varies from one business line and country to another. Moreover, the leasing, supply and services activities each has its own industry-specific requirements. The average supplier payment term is therefore difficult to compare depending on the activity and the country.

[\[DP 33b\]](#)

Supplier payment terms are negotiated on a case-by-case basis in compliance with the applicable regulatory provisions in force (in accordance with Article L4 41-6 of the French Commercial Code, for example).

[\[DP 33c\]](#)

No proceedings have been brought by third parties against the Econocom group for late payments in the last five years.

8. Regulation: european green taxonomy

Reporting activities of the Econocom group with regard to the European green taxonomy.

1. Background

European Regulation 2020/852 of 18 June 2020, commonly referred to as the “European Taxonomy”, is a central pillar of the European Union’s financial sector accountability strategy, as a tool to redirect capital flows towards sustainable investments. This tool sets out a reference framework and a common language to identify activities that contribute substantially to achieving six environmental objectives:

- climate change mitigation;
- adaptation to climate change;
- protection and sustainable use of water and marine resources;
- transition to a circular economy, waste prevention and recycling;
- pollution prevention and control;
- protection of healthy ecosystems.

The companies concerned must publish three “green” activity ratios in their extra-financial performance declaration (EFPD):

- green revenue;
- green capital expenditure (**CapEx**);
- green operational expense (**OpEx**).

This framework describes precise criteria and thresholds for eligibility and alignment:

- the activity must comply with the Commission’s technical review criteria;

- the eligible activity cannot contribute to one of the objectives while significantly harming one of the other five (principle of Do No Significant Harm – DNSH);
- the company must respect the minimum social safeguards.

No comparative data for the 2021 financial year is required for this reporting period in respect of the alignment.

2. Scope and calculation methodology

To determine the financial ratios presented in this note, Econocom has applied the rules defined by the delegated act known as “Article 8” of the Taxonomy regulation:

- the scope covers all the Group’s activities corresponding to the scope of consolidated companies. Companies in which the Group exercises joint-control or influence are excluded;
- the financial data is taken from the financial statements at 31 December 2023. Revenue and capital expenditure can therefore be reconciled with the financial statements. The underlying financial information was checked jointly by the finance and operational teams to ensure consistency and reconciliation with the consolidated financial statements;
- capital expenditure corresponds to the costs capitalised for tangible and intangible assets;
- operating expenses are defined as direct costs that cannot be capitalised and include research and development costs, building renovation costs, maintenance and repair costs, leases recognised in the income statement and any other expense arising from the day-to-day maintenance of assets.

3. Eligibility of activities

As part of its eligibility analysis, Econocom has endeavoured to reconcile its business model with the description of the activities listed in the Green Taxonomy's climate delegated act beyond the simple analysis of NACE codes (Statistical Classification of Economic Activities in the European Community), for the first two environmental objectives.

For the 2024 financial year, Econocom identified seven eligible activities:

Goals	Classification of economic activities	Description for Econocom	NACE codes
Climate change mitigation	9.3 Specialised services for the energy performance of buildings	Activities related to the "Green & Energy" Business Unit	M71
	8.1 Data processing, hosting and associated activities	Hosting activities	J61 ; J62 ; J63
Circular economy	4.1. Provision of data-driven IT/ operational solutions	IT Asset Management Software and Enterprise Mobility Solutions (example: MLC, HOUSTON, TWIST, TRAMS CLOUD MANAGE)	J61 ; J62 ; J63
	5.1. Repair, overhaul and remanufacturing	Product Care	C27
	5.3. Preparation for reuse of end-of-life products and product components	Econocom Factory	C27
	5.5. Products as services and other circular service models focused on use and results	Technology Management & Financing	C26 ; C32
	5.6. Marketplace for the trade of second-hand goods intended for reuse	Marketplace (EcoTwice)	C26 ; C27

Econocom also took into account individually eligible investments in respect of activities 6.5 – Vehicle purchase, financing, leasing, finance leases and operation – designated as belonging to categories M1 and N1 and 7.7 – Acquisition and ownership of buildings.

The purchase and resale of electrical and electronic equipment was not considered eligible. According to a strict interpretation of the regulation, only the Revenue corresponding to the assets held in full priority by ECONOCOM was considered eligible under activity 5.5.

4. Alignment of activities

As of the 2024 financial year, the Regulation has made mandatory the publication of eligible and aligned activities with regard to the six objectives of Regulation 2020/852. According to this regulation, an eligible activity is aligned, and therefore sustainable, if the activity:

- (i) meets the technical criteria of substantial contribution to one of the six environmental objectives;
- (ii) does not cause harm to any other environmental objective (Do No Significant Harm – DNSH);

(iii) complies with the minimum guarantees referred to in Article 3.c, namely the procedures that a company carrying out an economic activity implements to align itself with:

- a) the OECD Guidelines for Multinational Enterprises,
- b) the United Nations Guiding Principles on Business and Human Rights,
- c) the principles and rights set out in the eight fundamental conventions cited in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work,
- d) the International Bill of Human Rights.

a. Criteria for substantial contribution to climate change mitigation

Climate change mitigation

- 7.7 Acquisition and ownership of buildings.

The European taxonomy requires reaching a primary energy consumption threshold corresponding to the NZEB-10% for buildings constructed before December 31, 2020, those with an EPC equal to A or belonging to the top 15% of the national property portfolio. To date, the average threshold on our property portfolio is 156 kWh/m²/year (source: Sustainable Property Observatory). Buildings constructed after December 31, 2020 must meet the criteria specified in section 7.1.

Under these conditions, Econocom does not therefore meet the criteria of substantial contribution for this activity.

- 8.1 Data processing, hosting and related activities.

The activity has implemented the relevant practices of the European Code of Conduct on Energy Efficiency of Data Centres.

- 9.3 Specialised services for the energy performance of buildings.

The alignment of activities is conditional upon the typology of services with respect to the energy performance of buildings.

Circular economy

- 4.1. Provision of data-driven IT/operational solutions.

Econocom, through its IT asset management software and enterprise mobility solutions such as MLC, HOUSTON, TWIST and TRAMS CLOUD MANAGE, meets the technical criteria by integrating the required functionalities within these systems or software.

- 5.1. Repair, overhaul and remanufacturing.

Econocom's Product Care programme, which consists of extending the life of products through repair, reconditioning or remanufacturing, meets the requirements of the technical criteria.

- 5.3. Preparation for reuse of end-of-life products and product components.

Econocom Factory, a company specialising in the second life of IT equipment, reconditions and repairs electronic equipment, with the aim of extending the useful life of the equipment, through a short-circuit approach. This activity thus meets all the required criteria.

- 5.5. Products as services and other circular service models focused on use and results.

Technology Management & Financing activities meet the contractual criteria imposed by this taxonomic activity with the aim of extending the lifespan or increasing in the intensity of use of the product.

- 5.6. Marketplace for the trade of second-hand goods intended for reuse.

The EcoTwice marketplace sells second-hand devices. The electrical and electronic equipment concerned complies with the requirements of Directives 2009/125/EC and 2012/19/EU. A waste management plan is in place to prioritise reuse and promote recycling at the end of its life.

b. Do not cause significant harm

Adaptation to climate change

- 7.7 Acquisition and ownership of buildings.

The physical risks and vulnerability of assets to climate change have been the subject of a specific analysis which has led to the ongoing definition of action plans according to exposure levels.

Since the substantial contribution criteria for activity 7.7 were not met, the corresponding DNSHs were not subject to specific analysis.

- 8.1 Data processing, hosting and related activities.

The equipment used meets the requirements established in accordance with Directive 2009/125/EC for servers and data storage products.

It was considered that the DNSH with respect to adaptation to climate change and the sustainable use and protection of hydrological and marine resources were not applicable with regard to the hosting activity concerned.

- 9.3 Specialised services for the energy performance of buildings.

The DNSH on “Adaptation to Climate Change” and “Sustainable Use and Protection of Hydrological and Marine Resources” were considered not to be applicable with respect to the service activities concerned.

Circular economy

- 4.1. Provision of data-driven IT/operational solutions.

IT asset management software and enterprise mobility solutions and the equipment used to operate this software meet the requirements of Directive 2009/125/EC and Directive 2011/65/EU.

- 5.1. Repair, overhaul and remanufacturing.

The Product Care activity uses spare parts that comply with the applicable directives in the European Union (Directive 1907/2006, Directive 2011/65/EU and Directive (EU) 2017/2102).

- 5.3. Preparation for reuse of end-of-life products and product components.

Econocom Factory’s activity implements the safety procedures required to protect the health and safety of workers preparing devices with a view to reuse and thus meets the required criteria.

- 5.6. Marketplace for the trade of second-hand goods intended for reuse.

As part of its EcoTwice activity, Econocom has made every effort to apply the relevant practices of the European code of conduct with respect to the energy efficiency of data centres.

c. Minimum social safeguards

Econocom meets these different minimum guarantee criteria:

- Human rights: Econocom has implemented a comprehensive vigilance approach covering its human rights risks across the entire value chain. Furthermore, the group has not been the subject of any convictions with respect to human rights violations (see sub-section 5.3.1 of the ESRS S2 standard).
- Fight against corruption: Econocom is subject to the SAPIN II law and has deployed the required measures in the fight against corruption. Neither the group nor any of its managers have been convicted for this (see section 7.4. of the G1 standard).

- Taxation: Econocom strives to comply with the regulations applicable in all countries where it operates and implements a transparency policy in accordance with the OECD's BEPS recommendations. The group has not been convicted of serious breaches for this.
- Competition law: Econocom complies, within its scope of activity, with the legislation in force governing competition law. Neither the group nor any of its directors have been convicted for this.

5. Results

Conducted jointly by the Finance, CSR and Operational departments, Econocom has conducted a detailed analysis of all its activities in order to identify the eligible activities and the associated ratios.

05 sustainability report

regulation: european green taxonomy

a. Revenue

See note 4.1. of Chapter 8 “Financial statements”: the 2024 revenue amounts to €2,744 million.

In € millions

Economic activities	Code(s)	Absolute Revenue	Proportion of eligible Revenue	Substantial contribution criteria				
				Climate change mitigation	Adaptation to climate change	Aquatic and marine resources	Circular economy	Pollution
A. ACTIVITIES ELIGIBLE FOR TAXONOMY								
A.1 Sustainable activities								
Data processing, hosting and related activities	8.1	10.05	0.37%	100%				
Specialised services for the energy performance of buildings	9.3	0.00 ⁽¹⁾	0.00%	100%				
Providing data-driven IT/operational solutions	4.1	0.01	0.00%				100%	
Repair, Refurbishment and Remanufacturing	5.1	7.34	0.27%				100%	
Preparation for reuse of end-of-life products and product components	5.3	21.3	0.78%				100%	
Products as services and other circular service models focused on use and results	5.5	208.5 ⁽²⁾	7.60%				100%	
Marketplace for trading second-hand goods for reuse	5.6	0.12	0.00%				100%	
Revenue from sustainable activities (A.1)		247.4	9.0%	100%			100%	
A.2 Activities eligible for taxonomy but not sustainable		-	-					
Revenue from eligible but non-sustainable activities (A.2)		-	0.0%					
Total (A.1 + A.2)		247.4	9.0%					
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY								
Revenue from activities not eligible for taxonomy (B)		2,496.6	91.0%					
Total (A + B)		2,744.0	100.0%					

(1) The Revenue from activity 9.3. of the taxonomy (BU Green & Energy) is zero in 2024 following the restructuring of the business unit.

(2) The Revenue from activity 5.5. of the taxonomy (TMF activity) depends on the nature of the contracts entered into during the period.

DNSH

Climate change mitigation	Adaptation to climate change	Aquatic and marine resources	Circular economy	Pollution	Biodiversity and ecosystem	Minimum guarantees	Proportion of Revenue aligned on taxonomy - 2023	Category (enabling activity)	Category (transient activity)
	YES	YES	YES			YES	0.36%		T
	YES					YES	0.60%	H	
	YES	YES		YES	YES	YES			
	YES	YES		YES	YES	YES			
	YES	YES		YES	YES	YES			
YES	YES	YES		YES	YES	YES			
YES	YES	YES		YES	YES	YES			
							0.96%		

05 sustainability report

regulation: european green taxonomy

	Revenue	
	Proportion of aligned activities	Proportion of eligible activities
Climate change mitigation	0.4%	0.4%
Adaptation to climate change	0%	0%
Protection and sustainable use of water and marine resources	0%	0%
Transition to a circular economy, waste prevention and recycling	8.6%	8.6%
Pollution prevention and control	0%	0%
Protecting healthy ecosystems	0%	0%

b. Capital expenditure (CapEx)

Under Appendix 1 of the Article 8 Delegated Regulation, Econocom reports capital and operating expenses associated with an eligible activity and individual capital expenses that are not associated with an activity intended for commercial purposes.

Capital expenditure and operating expenses mainly concern individual expenses for the property sector, and correspond mainly to the usage rights of building and vehicle leasing contracts.

See note 10 of Chapter 8 “Financial statements”: 2024 investment expenditure amounts to 41.5 million euros.

05 sustainability report

regulation: european green taxonomy

in € millions

Substantial contribution criteria

Economic activities	Code(s)	Absolute CapEX	Eligible CapEX proportions	Climate change mitigation	Adaptation to climate change	Aquatic and marine resources	Circular economy	Pollution	Biodiversity and ecosystem
A. ACTIVITIES ELIGIBLE FOR TAXONOMY									
A.1 Sustainable activities									
Vehicle purchase, financing, leasing, finance leases and operation	6.5	1.8	4.3%	100%					
Providing data-driven IT/operational solutions	4.1	0.0	0.0%				100%		
Repair, Refurbishment and Remanufacturing	5.1	0.1	0.3%				100%		
Preparation for reuse of end-of-life products and product components	5.3	0.2	0.5%				100%		
Products as services and other circular service models focused on use and results	5.5	0.7	1.3%				100%		
Marketplace for trading second-hand goods for reuse	5.6	0.00	0.0%				100%		
CapEx of sustainable activities (A.1)		2.71	6.4%	100%			100%		
A.2 Activities eligible for taxonomy but not sustainable									
Vehicle purchase, financing, leasing, finance leases and operation	6.5	6.9	16.8%						
Acquisition and ownership of buildings	7.7	16.11	38.8%						
CapEx of eligible but non-sustainable activities (A.2)		23.1	55.6%						
Total (A.1 + A.2)		25.7	62.0%						
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY									
CapEX of activities not eligible for taxonomy (B)		15.8	38.0%						
Total (A + B)		41.5	100.0%						

05 sustainability report

regulation: european green taxonomy

	CapEx	
	Proportion of aligned activities	Proportion of eligible activities
Climate change mitigation	4.3%	4.3%
Adaptation to climate change	0%	0%
Protection and sustainable use of water and marine resources	0%	0%
Transition to a circular economy, waste prevention and recycling	2.1%	2.1%
Pollution prevention and control	0%	0%
Protection of healthy ecosystems.	0%	0%

c. Operating Expenses (OpEx)

Based on 2024 reporting, maintenance and leasing costs (with respect to non-capitalised contracts) represent an insignificant portion of the group's total operating costs.

Following the definition in section 1.1.3.1 of Appendix 1, the total amount of the denominator of OpEx for the 2024 financial year is €2,636.3 million, the majority of which was from the purchase costs of sold or leased goods.

in € millions

Economic activities	Code(s)	Absolute OpEx	Proportion of eligible OpEx	Climate change mitigation	Substantial contribution criteria				
					Adaptation to climate change	Aquatic and marine resources	Circular economy	Pollution	Biodiversity and ecosystem
A. ACTIVITIES ELIGIBLE FOR TAXONOMY									
A.1 Sustainable activities									
		-	0%						
OpEx of sustainable activities (A.1)		-	0%						
A.2 Activities eligible for taxonomy but not sustainable									
		-	0%						
OpEx of eligible but non-sustainable activities (A.2)		-	0%						
Total (A.1 + A.2)		-	0%						
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY									
OpEx of activities not eligible for taxonomy (B)		-	0%						
Total (A + B)		-	0%						

6. Activities related to nuclear energy and fossil gas

The table below shows the standard model for the publication of information with respect to nuclear and gas activities according to Delegated Regulation (EU) No 2022/1214 of the European Commission of March 9, 2022.

Line	Activities related to nuclear energy	
1.	The company carries out, finances or is exposed to research, development, demonstration and deployment activities of innovative installations for the production of electricity from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The company carries out, finances or is exposed to activities of construction and safe operation of new nuclear installations for the production of electricity or industrial heat, in particular for district heating purposes or for industrial processes such as hydrogen production, including their safety upgrades, using the best available technologies.	NO
3.	The company carries out, finances or is exposed to activities for the safe operation of existing nuclear installations for the production of electricity or industrial heat, in particular for district heating purposes or for industrial processes such as the production of hydrogen, from nuclear energy, including their safety upgrades	NO
Fossil gas-related activities		
4.	The company carries out, finances or is exposed to activities of construction or operation of electricity production facilities from gaseous fossil fuels	NO
5.	The company carries out, finances or is exposed to activities of construction, refurbishment and operation of combined heat/cold and electricity production facilities from gaseous fossil fuels.	NO
6.	The company carries out, finances or is exposed to activities of construction, refurbishment or operation of heat production facilities which produce heat/cold from gaseous fossil fuels.	NO