

5

SUSTAINABILITY REPORT

1. General Information Standard [ESRS 2]	121	3. Resource use and circular economy [ESRS E5] MR	145
1.1. Basis for preparing the report	121	3.1. Materiality matrix and strategy for the circular economy	145
1.2. CSR Governance	122	3.2. Measures and resources [E5-2]	146
1.3. Strategy	125	3.3. Targets [E5-3]	147
1.4. Management of material impacts, risks and opportunities	130	3.4. Incoming flows of resources [E5-4]	148
2. Climate change [ESRS E1] MR	132	3.5. Outgoing flows of resources [E5-5]	149
2.1. Climate change-related remuneration criteria [GOV 3]	132	3.6. Expected financial effects of the circular economy [DR E5-6]	149
2.2. Transition plan [E1-1]	132	4. Company employees [ESRS S1] MR	150
2.3. Materiality matrix and strategy for climate change	133	4.1. Stakeholder interests and views [ESRS 2 SBM 2]	150
2.4. Actions to reduce the Group's impact on climate [E1-2]	134	4.2. The Group's social strategy in response to the impacts, risks and opportunities identified [ESRS 2 - SBM 3 ; IRO 1 ; MDR -P-A-T]	151
2.5. Targets set for climate change measures [E1-4]	137	4.3. Human Resources Policies and target [S1-1 and S1-5]	155
2.6. Energy consumption and energy mix [E1-5]	140	4.4. Process for exchanging with stakeholders [S1-2]	158
2.7. Gross GHG emissions [E1-6]	140	4.5. Remedial processes and alert channels [S1-3]	160
2.8. Carbon credits and method of eliminating GHG emissions [DR E1-7]	144	4.6. Actions and approaches to address defined policies [S1-4]	161
2.9. Internal carbon pricing [E1-8]	144	4.7. Characteristics of the company's employees [S1-6]	163
2.10. Expected financial effects of climate change [E1-9]	144	4.8. Characteristics of the non-employees [S1-7]	166

4.9. Collective bargaining and industrial relations [S1-8]	167	5.4. Process of dialogue and interaction with workers in the value chain and/or their representatives [S2-2]	182
4.10. Diversity [S1-9]	168	5.5. Communication channels and negotiation processes to address negative impacts and allow value chain workers to voice their concerns [S2-3]	183
4.11. Equal Pay [S1-10]	169	5.6. Measures and resources [S2-4]	184
4.12. Social protection [S1-11]	170	5.7. Targets defined [S2-5]	187
4.13. Disability [S1-12]	171	6. Business Conduct [ESRS G1] MR	188
4.14. Training and skills development [S1-13]	171	6.1. ESRS 2 General information standard data ESRS 2 [GOV-1 & IRO-1]	188
4.15. Health and safety in the workplace [S1-14]	173	6.2. Vision and corporate culture [G1-1]	188
4.16. Work-life balance [S1-15]	174	6.3. Supplier Relationship Management [G1-2]	192
4.17. Remuneration indicators [S1-16]	174	6.4. Prevention and fight against corruption and bribery [G1-3]	194
4.18. Human rights incidents and complaints [S1-17]	176	6.5. Incidents of corruption or bribery [G1-4]	195
5. Value chain workers [ESRS S2] MR	178	7. Regulation: European green taxonomy	196
5.1. Stakeholder interests and views [ESRS 2 SBM 2]	178		
5.2. Material MATRIX AND MATTERS [ESRS 2 SBM 3]	178		
5.3. Value Chain Worker Policies [DR S2-1]	180		

1. General Information Standard [ESRS 2]

1.1. Basis for preparing the report

1.1.1. GENERAL BASES FOR PREPARING SUSTAINABILITY REPORTS [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 is drawn up 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 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-9]

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

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

Value chain metrics [DP-10]

Quantitative performance indicators (metrics) including value chain data calculated indirectly concern mainly the environmental standard on climate change (ESRS-E1). These estimates relate to the calculation of scope 3 of the 2025 carbon footprint.

The emissions factors used to convert monetary expenditure into the equivalent in greenhouse gas emissions are average sector data and were used in the absence of specific data from the main stakeholders in the value chain.

Lastly, the Group intends to improve the accuracy of data used to calculate the emissions from its purchasing (including, for example, more precise information on the purchasing product families).

Sources of estimates or uncertainty [DP-11]

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

- ESRS E1 Standards:
 - ▶ the monetary carbon footprint is calculated for the main emitting entities. The remaining emissions not analysed in the Group's carbon footprint is estimated based on credible comparable elements and concern immaterial entities and entities held for sale;
 - ▶ we have estimated the carbon footprint of quantities purchased by the Group by categorizing them by product family. Each product family is associated with one or more monetary emission factors;
 - ▶ another source of uncertainty concerns the calculation of emission categories from Econocom's value chain.

- ESRS E5 Standard:
 - ▶ The volume of assets purchased by the distribution business for the current year is calculated pro rata to the previous year's volumes (recorded via a physical analysis of the carbon footprint) based on the monetary amounts of the current year.
 - ▶ The volume of assets purchased by the distribution activities from the circular economy also presents a source of uncertainty. Based on the estimations of the purchasing departments of the different distribution businesses, only 1% of purchases come from circular circuits.

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

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).

In 2025, there were no major changes to the preparation or presentation of the Group's sustainability reports.

The double materiality matrix has nevertheless been updated as ESRS S4, which was deemed material in 2024, is no longer deemed so in 2025.

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]

Econocom used transitional measures as defined in CSRD in the new appendix C of ESRS 1⁽¹⁾ and more specifically with regard to calculating the financial effects expected by the Group.

1.2. CSR Governance

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

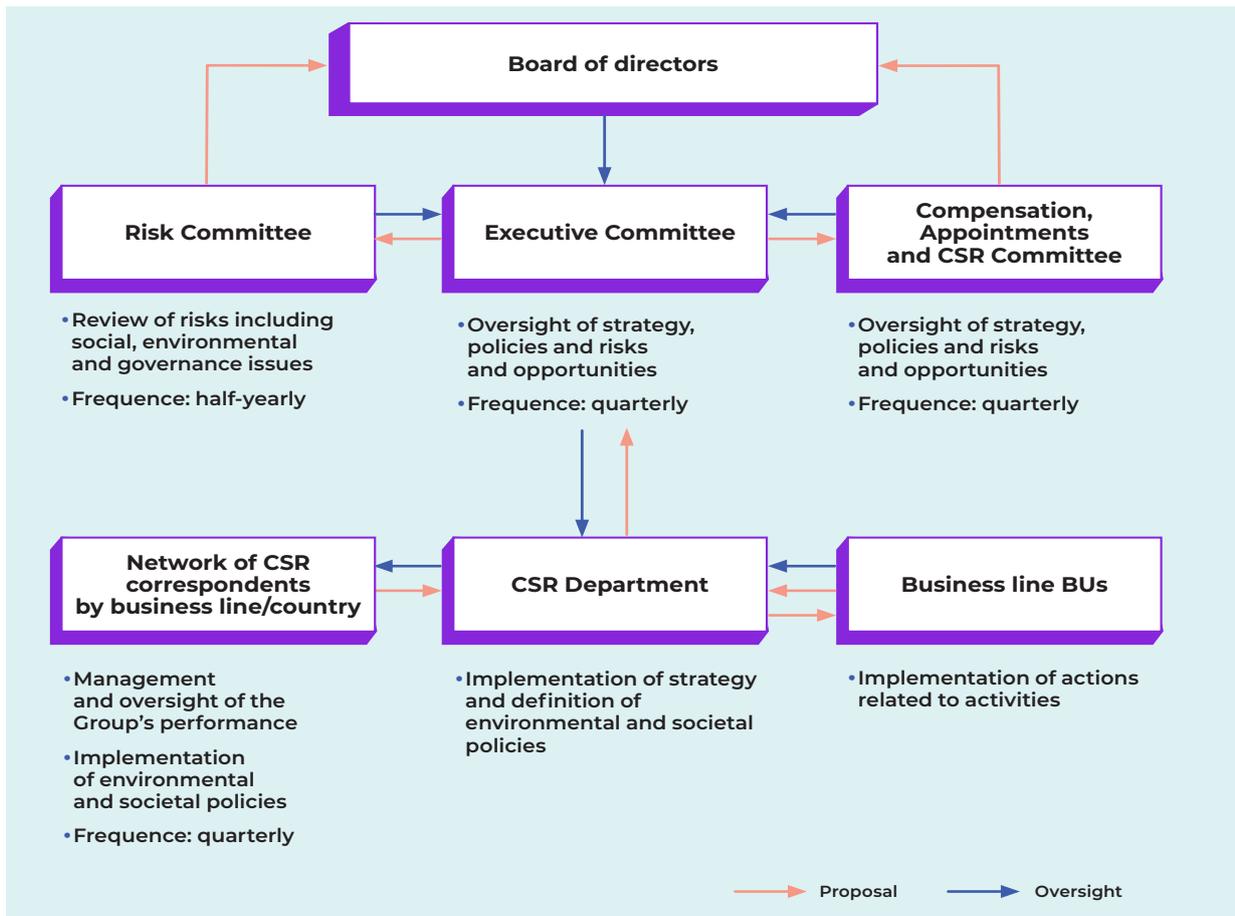
Management of CSR policy

Econocom's CSR policy involves all Group employees. The CSR Department is headed by Véronique di Benedetto. 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 part of the operational teams of the CSR Steering Committee members and are responsible for deploying objectives in their respective areas. They implement the action plans approved by Committees, and also act as ambassador for the policy to their teams.

(1) After taking into account regulatory changes adopted in July 2025, ("Quick Fix" measures). Wave-1 companies have three years from the publication of the first sustainability report to apply transitional measures.



[DP 21a]

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

[DP 22]

The entire process for defining Impacts, Risks and Opportunities and the resulting policies/actions have been approved by several members of the Management team (Financial Management and CSR Management). 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 [GOV-2]

[DP 26a & 26b]

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).

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

[DP 29a]

Econocom's incentive system includes sustainability performance elements. In 2025, the variable part of the salary of certain employees in the Purchasing, Finance, HR, business and other departments was based on CSR-related goals, including initiatives to reduce carbon footprint.

1.2.4. SUSTAINABILITY DUE DILIGENCE REPORTS [GOV-4]

Due Diligence	Stakeholder engagement	Identify and assess negative impacts;	Take actions to address impacts;	Monitor and communicate on effectiveness
ESRS E1 - GOV 3 (section 2.2.)	ESRS S1 - Strategy, Business Model 2 (section 4.1.)	ESRS E1 - SBM 3 (section 2.3.)	ESRS E1 - MDR Policies & Actions (section 2.1. to section. 2.4.)	ESRS E1 - MDR Targets & Metrics (section 2.6. to section 02:11.)
ESRS G1 - GOV 1 (section 7.1.)	ESRS S2 -SBM 2 (section 5.1.)	ESRS S1 -SBM 3 (section 4.2.)	ESRS E5 - MDR P&A (sections 3.2., 3.3)	ESRS E5 - MDR T&M (section 3.4. to section 3.7.)
		ESRS S2 -SBM 3 (section 5.2.)	ESRS S1 - MDR P&A (section 4.3. to section 4.6.)	ESRS S1 - MDR T&M (section 4.7. to section 04:19.)
		ESRS E1 - Impacts, risks, opportunities 1 (section 2.3.)	ESRS S2 - MDR P&A (section 5.3. to section 5.6.)	ESRS S2- MDR T (section 5.7.)
		ESRS E5 -IRO 1 (section 3.1.)	ESRS G1 - MDR P&A (section 7.2. to section 7.4.)	ESRS G1 - MDR T&M (section 7.5. to section 7.7.)
		ESRS G1 -IRO 1 (section 7.1.)		

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

[DP 36]

To ensure better risk management, controls on certain data points have been implemented with respect to all material sustainability standards and are operated by different departments.

An initial check of data is carried out by the departments in charge of data collection. Once the data has been consolidated and reported to the Group, the CSR department carries out a second check and approval.

The indicators directly linked to the Group's strategic plan are subject to additional controls by the department in charge. This concerns indicators with respect to:

- environmental matters: SBTi plan and circular economy;
- social matters: gender parity and employing people with disabilities.

1.3. Strategy

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

[DP 40]

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

- P & S (Products and Solutions) = Distribution ;
- TMF (Technology Management & Financing) = Leasing and associated services;
- Services = Software, outsourcing and other IT services.

It should be remembered that the operational sectors used in the sustainability reports are the same as those described in the financial statements and shown below.

A breakdown of revenue for each sector is shown directly in the “Revenue by business” section of the Group’s consolidated financial statements.

Combined strategic operating business segments	Description	Countries
Products & Solutions	Services ranging from the design of solutions to their deployment, including the sale of hardware and software (PCs, tablets, servers, printers, licences, digital objects, etc.) and systems integration.	Germany, Brazil, Belgium, Spain, France, Italy, Luxembourg, Mexico, the Netherlands, Switzerland and the United Kingdom.
Services	Support for transformation towards the new digital world through our expertise (in consulting, infrastructure management, application development and integration of digital solutions).	Belgium, Spain, France, Morocco and the Netherlands.
Technology Management & Financing	Innovative, tailored financing solutions to ensure more effective administrative and financial management of companies’ ICT and digital assets.	Germany, Belgium, Spain, United States, France, Ireland, Italy, Luxembourg, the Netherlands, Poland and United Kingdom.

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 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 recycled or reconditioned assets;
- double the number of assets under maintenance via our Product Care offering;

(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).

- 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 decarbonization 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 Pay Gap. This concerns all sectors and countries.

[DP 42]

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:

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

The main tier 1-suppliers are mostly IT hardware wholesalers and distributors such as Ingram Micro or TD Synnex. Our tier 2-suppliers are 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- and Tier 2-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.

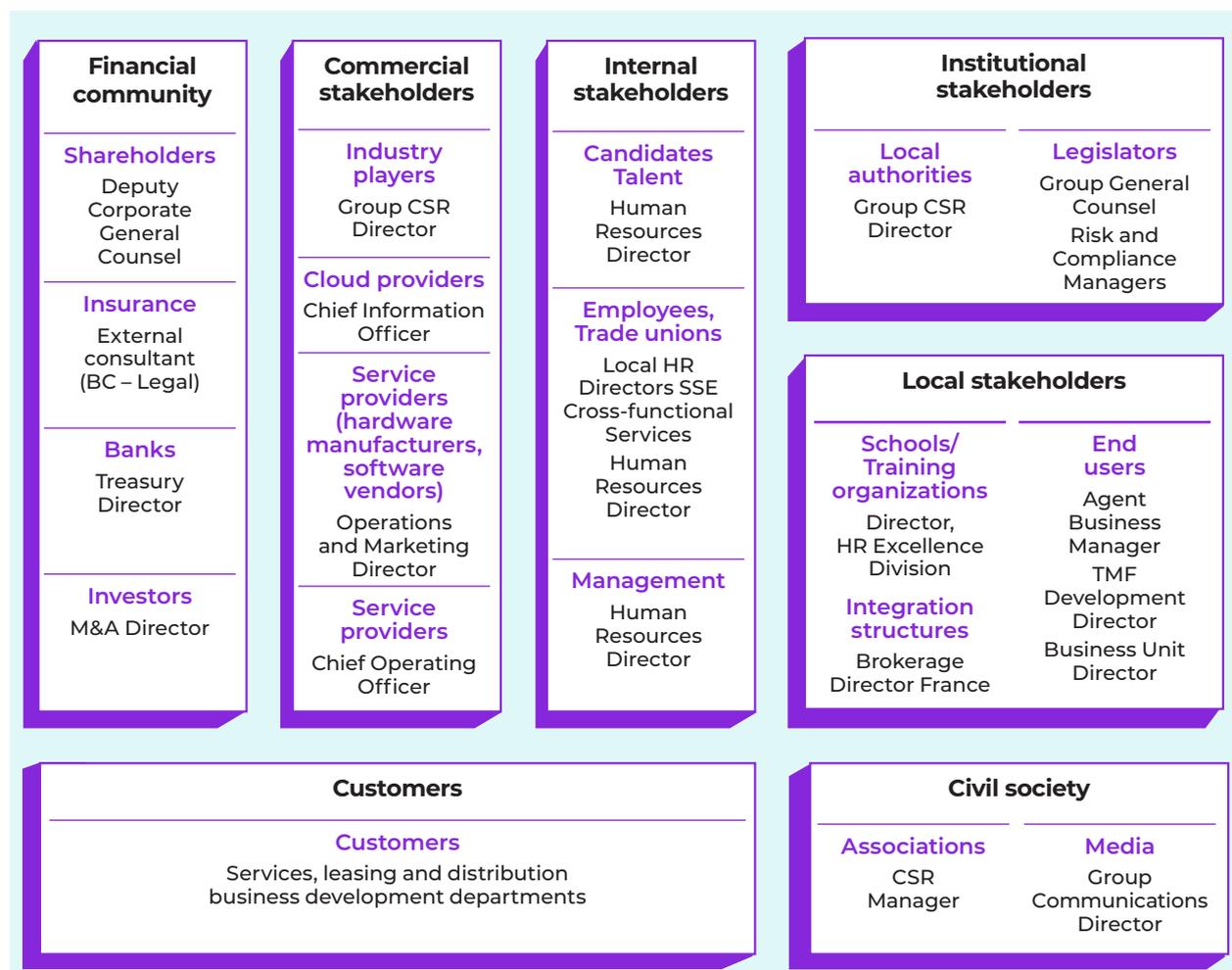
- **Services:**

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]

Below is an overview of internal stakeholders. They have all been involved in the double materiality analysis:



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, the Audit Committee validated them by signing the 2023 report).

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

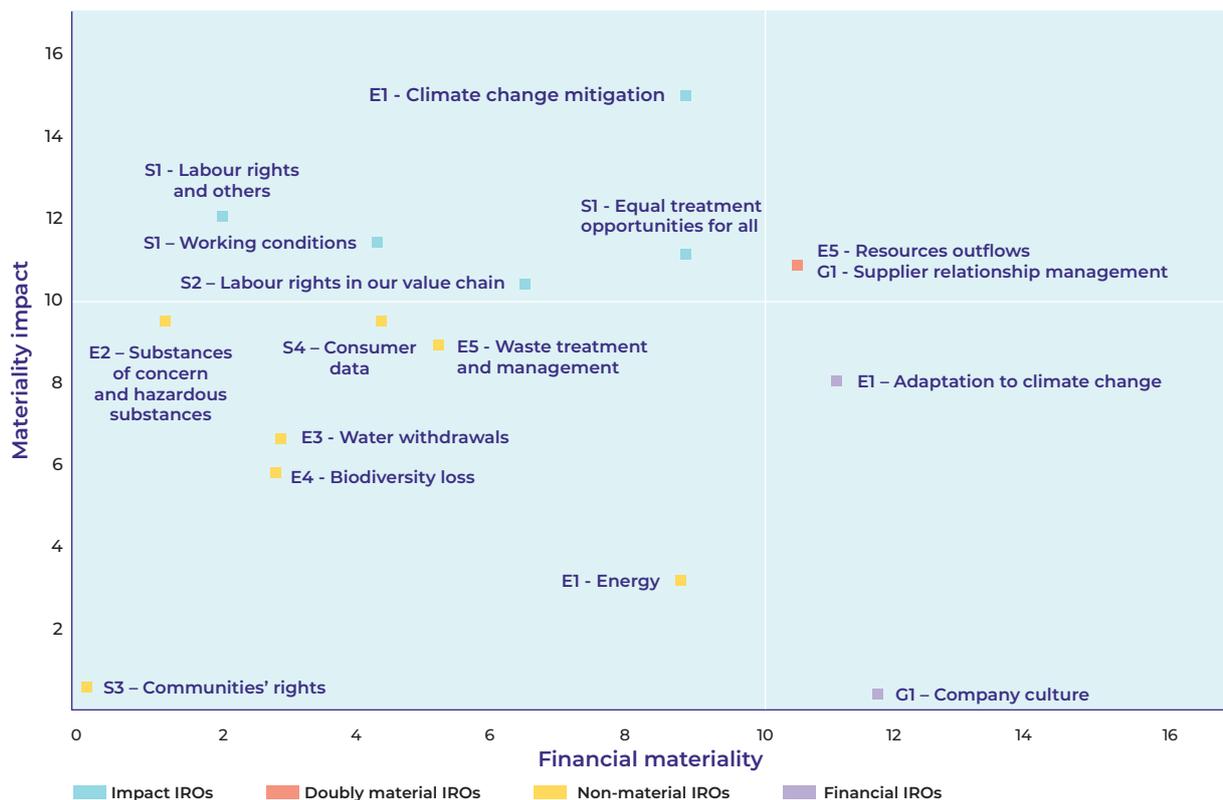
These external consultations allowed us to confirm that these subjects were non-material for these stakeholders and that no IROs or issues should be added as “new” in our materiality matrix. Nevertheless, certain issues which were either only financial or only impactful could become doubly material.

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

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. DOUBLE MATERIALITY MATRIX FOR THE ECONOCOM GROUP [SBM 3]

[\[DP 48 & DP 49\]](#)



The lower left corner (yellow squares) shows the sub-topics of the standards that are not material for the Econocom Group.

The upper left and lower right corners (mauve squares) show the material sub-topics of the standards, either exclusively financial or exclusively impact.

The upper right corner (red squares) shows the doubly material topics.

Information on the IROs can be found in the chapters on the corresponding ESRS.

Changes to the materiality matrix in 2025:

In 2025, Econocom conducted a review of all the impacts, risks and opportunities associated with

the topics in its double materiality matrix for the purpose of identifying any potential changes:

The benchmarks used for the initial feedback on managing sustainability issues for the first CSRD publications enabled us to adjust the materiality of certain issues.

For this reason, the impacts in terms of consumers and end-users underwent a more in-depth analysis and were updated as not relevant for the Group in 2025. Furthermore, the question of the relevance of the materiality of these impacts was raised by the auditors at the 2024 year-end.

Lastly, the topics and sub-topics not relevant for Group are summarized below:

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
E2	Pollution	Substances of concern and hazardous substances
E3	Water	Water withdrawal
E4	Biodiversity and ecosystems	Direct causes of biodiversity loss
E5	Circular economy and use of resources	Waste management and processing (in particular WEEE)
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. PROCESS FOR IDENTIFYING AND ASSESSING MATERIAL IMPACTS, RISKS AND OPPORTUNITIES [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 (IROs) 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:**
 - ▶ assessment of IROs 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 harmonize 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	
S1 – Own workforce	• Equal treatment opportunities for all	• Gender Equality
		• Training and skills development
		• Employment and inclusion of persons with disabilities
		• Diversity
	• Other work – related rights	• Human Rights
S2 – Workers in the value chain		• Privacy (personal data)
		• Secure employment
	• Working conditions	• Adequate wages
		• Collective Bargaining
G1 – Business conduct		• Work-life balance
	• Other work – related rights	• Human Rights
	• Working conditions	• Health & Safety
	• Corporate culture	
	• G1 – Business conduct Management of relationships with suppliers including payment practices	

2. Climate change [ESRS E1]

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

[DP 13]

Econocom's incentive system includes sustainability performance elements. This part is detailed in ESRS-2 GOV3.

2.2. Transition plan [E1-1]

[DP 14]

Econocom's transition measures began in 2018 and were implemented through the decarbonization 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-16]

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.

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.

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 decarbonize because they are very carbon-intensive, and with very little leeway for reducing their associated emissions.

Lastly, the Group complies with the taxonomy on these aligned activities: (see [chapter 7 Regulation European Green Taxonomy](#)). It has not, however, set any goals or action plan over time for improving its taxonomy indicators.

2.3. Materiality matrix and strategy for climate change

[DP 12]

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.

The table below illustrates how the Group implements its sustainability strategy (One econom strategic plan) to address the IROs identified in the matrix:

- which policies and actions apply to the IROs identified?
- what targets are implemented for these actions in the future?

All the actions and targets are described in detail in the following parts of the standards.

Sub-topics	Impacts, risks and opportunities [SBM 3 & IRO 1]	Scope	Timeline	Details on IROs	Policies & Actions [MDR-P & MDR-A]	Targets [DR E1-4 MDR-T]
Adaptation	Strengthening environmental regulations on the product life cycle Financial only	Direct activities + value chain	Medium and long term	Risks Could generate additional costs associated with compliance. Opportunities Competitive advantages if the Group keeps abreast of regulatory changes.	Economcom has not yet defined any specific policies, actions or targets with respect to adapting to climate change.	
	Resilience of supply chains to the effects of climate change Financial only	Direct activity and Value chain	Long term	Risks Potential shortages of materials Growth constraint of revenue Opportunities Development of sustainable activities Reduction of emissions from purchasing		
Mitigation & Energy	Upstream and downstream value chain emissions Impact only	Value chain	Medium and long term	Impact (-) Greenhouse gas emissions that contribute to global warming	Reducing and limiting the Group's carbon emissions Supply of renewable electricity Supplier Commitments	61.4% reduction in scope 1&2 over 10 years 92% green electricity by 2028 100% suppliers with SBTI commitments
	Emissions from our direct activities and use of our assets in our value chain Impact only	Direct activities + value chain	Short and medium term	Impacts (-) The Group has an energy impact downstream of its value chain (and its direct activities) through the sale and leasing of IT and non-IT assets.	Improve energy efficiency and reduce digital consumption for our internal uses and for our customers:	The Group has not yet defined any targets.

2.4. Actions to reduce the Group's impact on climate [E1-2]

2.4.1. REDUCING ECONOCOM'S IMPACT ON CLIMATE

- **Absolute reduction: draw up an energy saving plan**

To address energy challenges, Econocom has taken action to reduce energy consumption in France and internationally by 10% compared with 2023 over two years. As a responsible digital

entrepreneur, Econocom has created an energy saving plan whereby we pledge to:

- reduce the electricity consumption of Econocom premises;
- reduce gas consumption of premises⁽¹⁾.

Energy consumption of buildings	2024	2025
Electricity consumption of the Group's buildings	7,777,192	7,899,955
France	4,621,044	4,515,016
International	3,156,148	3,384,939
Electricity consumption of the Group's buildings	726,370	654,447
France	476,400	397,462
International	249,970	256,985

Between 2023 and 2025, electricity consumption from buildings was down **12%**. Gas consumption fell by **54%**.

- **Total reduction: decarbonizing the Econocom group's automobile fleet**

The Econocom group aims to switch its entire vehicle fleet to electric or hybrid vehicles by 2028. In addition, in 2025, 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.

In 2025, the percentage of electric/hybrid vehicles is **50.1%** for the Econocom group (compared to 48.3% in 2024, an increase of 2.8 points in one year).

Vehicle fleet	2024	2025
Percentage of electric vehicles	20.5%	21.7%
Percentage of hybrid vehicles	27.8%	28.5%

- **Supply of renewable electricity**

In 2025, the electricity consumed by Econocom from renewable energy sources was broken down as follows:

Use of green electricity (%)	2024	2025
France	90.2%	88.2%
Belgium/Luxembourg	43.5%	100.0%
The Netherlands	27.3%	35.0%
Italy	11.4%	1.2%
Spain	89.0%	94.3%
Germany/Poland	72.0%	87.7%
United Kingdom	70.2%	62.0%
Total	75.1%	79.0%

(1) These objectives will be achieved by implementing the following measures: Reducing the temperature of our premises to 19°C, turning off indoor lighting in buildings from 9 p.m. to 6 a.m, turning off outdoor illuminated signs on buildings from midnight to 5 a.m., putting our buildings into frost protection mode and completely shutting down air conditioning at night and on weekends, continuing to install low voltage lighting (LED) and motion-sensor systems.

The rising proportion of green electricity is due to the increase in green contracts (100% green electricity supplied) concluded by the entities in each geographical area and the overall improvement of energy mixes. It should be noted that, given that the signing of green contracts is **at**

the discretion of each of the Group's subsidiaries, the percentage of green electricity in each country is not necessarily 100%, even though the green contracts were signed in the country in question.

Signing of green contracts	2024	2025
France	Yes	Yes
Belgium/Luxembourg	No	Yes
The Netherlands	No	Yes
Italy	No	No
Spain	Yes	Yes
Germany/Poland	Yes	Yes
United Kingdom	Yes	Yes

• Supplier commitment

Concerning the commitments of the Group's suppliers with respect to scope 3, Econocom has been working to improve its knowledge of its vast upstream value chain and thus monitor more closely its suppliers' SBTi commitments.

To that end, the 33% of unidentified suppliers recorded in the 2024 audit has since been lowered following a more in-depth analysis by the CSR department. Consequently, the proportion of unidentified suppliers is now only 20.3% for 2024 (*the 2024 figures have been adjusted and are shown in E1-4*).

The proportion of unidentified suppliers remained stable at 17.4% at the end of 2025⁽¹⁾

Furthermore, in 2025 Econocom carried out initiatives to inform its clients and share best practices on responsible purchasing. The aim of this initiative was to alert clients to the need to have suppliers with SBTi commitments.

As a reminder, as Econocom is an intermediary in its value chain (not a decision maker), it is its clients who choose the suppliers they wish to work with.

• Improve energy efficiency for our internal uses and our customers:

► For our internal uses:

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; The Group is relying on these actions to optimize its energy efficiency and reduce its impact.

The study carried out for 2025 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.

► Use:

Econocom has reduced its digital energy consumption for the ninth consecutive year. This decrease is due to the combination of several new green IT measures implemented.

(1) Unidentified suppliers: the information was not reported by the subsidiaries and therefore not consolidated.

Measures taken in 2025:

- Closing of the Noisy data centre and transfer of part of the equipment to the TELEHOUSE and EQUINIX data centres;
- streamlining of infrastructure and network equipment at the branch offices;
- subscribing to renewable energy contracts in France, Belgium, Germany, the Netherlands, Spain and the UK.
 - ▶ Manufacturing (CO₂ avoided).
Extending the useful life of equipment beyond its original lifespan results in less frequent manufacturing of new products.

Environmental impact of digital technology (Green IT)	2024	2025
Energy footprint of digital technology (kwh)	3,131,177	2,331,313

• For our customers

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.

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 and strengthen productivity while fulfilling the responsible dimension of its range of offers.

The Econocom group has already developed 11 offers with a positive impact described in the note to the table below (non-exhaustive list, see chapter on offers in the impact report).

Responsible digital and customer offer:	2024	2025
Number of commercial offers for responsible digital technology ⁽¹⁾	11	14

(1) Our commercial offers for responsible digital technology, green IT and the circular economy: Productcare, EcoCarbon, EASI, Green & Energy, BuyBack, EASI, Ecocare,.i.tem, Workplace as a Service, HubReg, E-bike, Eco-Building, EcoSwitch, EcoTwice, ePOS Services.

Consolidated revenue from impact offers

Impact offers (in € millions)	2024	2025
Income from impact offers	507	530
Proportion of this revenue in the total revenue	18.5	18.1

Including revenue from second-hand goods

Second-hand (in € millions)	2024	2025
Income from impact offers	234	209
Proportion of this revenue in the total revenue	8.5	7.6

2.5. Targets set for climate change measures [E1-4]

[DP 34]

Description of the three targets:

- Target 1:

Econocom aims to reduce its absolute scope 1 and 2 GHG emissions by 61.4% by 2028 compared with 2018.

- Target 2:

Econocom has also pledged to increase the annual proportion of renewable electricity from 5% in 2018 to 92% by 2028.

- Target 3:

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.

The numbers are expressed in TC02eq:	Baseline year			Target
	2018	2024	2025	2028
Scope 1	10,351	4,754	4,483	4,289
Scope 2 (market-based)	2,328	671	648	605
Total	12,681	5,435	5,131	4,895

SBTi suppliers	Baseline year			Target
	2022	2024	2025	2028
IT suppliers (incl. Proportion of unidentified suppliers ⁽¹⁾)	45%	49.9%	62.8%	100%
IT Suppliers (suppliers identified by the group)	65%	71.1%	76.0%	100%

(1) Unidentified suppliers: the information was not reported by the subsidiaries and therefore not consolidated.

Green electricity	Baseline year			Target
	2022	2024	2025	2028
Use of renewable electricity	40%	75%	79%	92%

[DP 34 F]

Below is a description of the assumptions and intermediary results concerning the Group's decarbonization plan for 2028. The decarbonization measures concern scope 1 & 2 emissions.

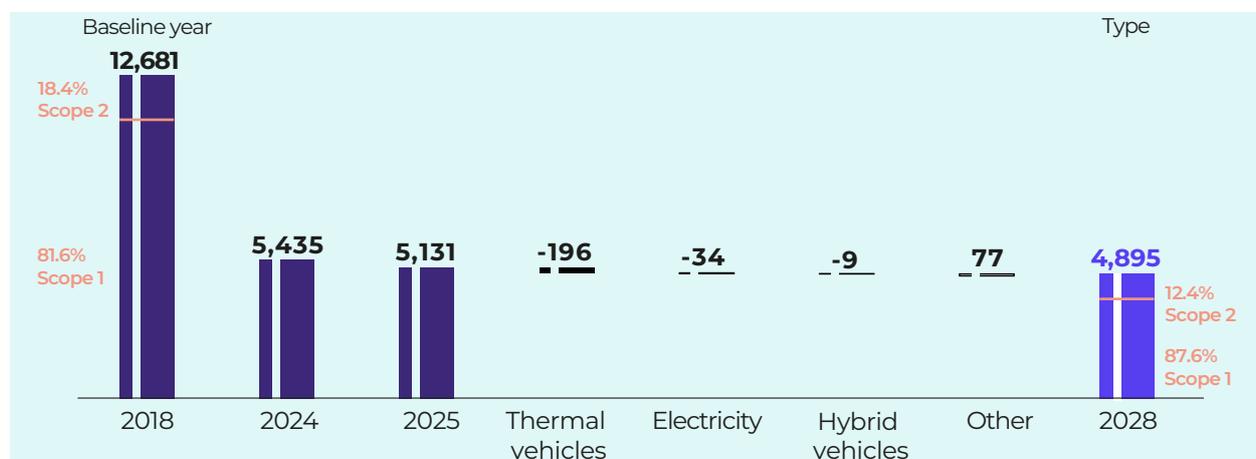
The targets were set with respect to actions to reduce the of impact Group's emissions.

The decarbonization measures and assumptions for scopes 1 & 2 are as follows:

Measure	Impact	Method	Scope
Energy efficiency and reducing consumption	Reduce gas consumption and optimizing/pooling consumption of the client data hosting centres.	Collect quarterly metrics on gas consumption from subsidiaries and data centres.	Scope 1&2
Use of renewable energies	Increase use of renewable energies such as solar panels.	Implementation of quarterly indicators in 2024 to monitor more accurately Econocom entities that produce and use renewable energy (for example, solar panels in Belgium and the Netherlands).	Scope 1&2
Fuel switching	Reduce the use of diesel and petrol and increase the use of electric vehicles.	Follow quarterly indicators used to calculate the Group's carbon footprint from electric vehicles for each of its entities.	Scope 1&2
Green electricity	Increase the proportion of renewable energy in the energy mix while increasing the number of green electricity contracts in the Group.	Track the increase in the proportion of green electricity in the energy mix of each Econocom entity and the rising number of green contracts ⁽¹⁾ . The more this proportion increases, the more sustainable electricity is used in buildings and data centres, enabling Econocom to measure the potential of decarbonization in its scope 2.	Scope 2

(1) Reminder: Green contracts are (as defined by GHG Protocol), market instruments that enable 100% decarbonization of indirect emissions from purchasing electricity.

Tracking the decarbonization plan for scope 1&2 (from 2018 to 2028 with intermediary milestones in 2024 and 2025):



Econocom reduced its scope 1 by **54%** between 2018 and 2024. This is mainly due to the reduction in emissions from petrol and diesel from the Group's company car fleet.

Scope 1 emissions decreased by **5.9%** between 2024 and 2025.

They need to decrease by a further **4.3%** to **reach the 2028 target**.

The main indicators used for monitoring action plans in the different countries are shown below:

2025 vehicle fleet	Group	France	Belgium	Spain	Italy	The Netherlands	Germany	United Kingdom
Hybrid	28.5%	29.5%	1.2%	22.0%	49.1%	39.0%	33.6%	0%
Electric	21.7%	18.5%	57.2%	44.7%	0.0%	2.9%	17.2%	0%
Total number	2,151	1034	327	132	232	310	116	0

Green energy in 2025	Group	France	Belgium	The Netherlands	Italy	Spain	Germany	United Kingdom
Green electricity	79%	88%	100%	35%	1%	94%	88%	62%
Solar panels	1%	0%	5%	3%	0%	0%	0%	0%
Gas	4.9%	6%	15%	5%	0%	0%	0%	0%

2028 vehicle fleet	Group	France	Belgium	Spain	Italy	The Netherlands	Germany	United Kingdom
Hybrid	10%	0.0%	0.0%	30.0%	45.0%	15.0%	29.0%	0.0%
Electric	78%	96.0%	63.0%	7.0%	5.0%	70.0%	35.0%	0.0%
Total number	1,814	874	383	174	225	141	17	0

Green energy in 2028	Group	France	Belgium	The Netherlands	Italy	Spain	Germany	United Kingdom
Green electricity	92%	100%	100%	90%	100%	100%	70%	90%
Solar panels	12%	0%	40%	0%	28%	30%	0%	0%
Gas	4%	0%	15%	5%	0%	0%	0%	0%

2.6. Energy consumption and energy mix [E1-5]

[DP 37]

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

Categories	2024	2025
Total non-renewable energy consumption (Mwh)	23,793	24,508
<i>Proportion of renewable sources in total energy consumption</i>	72%	71%
Total renewable energy consumption (Mwh)	9,098	9,780
<i>Proportion of renewable sources in total energy consumption</i>	28%	29%
Total energy consumption (Mwh)	32,891	34,288

2.7. Gross GHG emissions [E1-6]

[DP 38]

2.7.1. GENERAL INFORMATION AND CONSOLIDATION SCOPES

General information:

The carbon footprint assessment gives an annual overview 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:
 - ▶ 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.

The monetary carbon footprint was calculated for all so-called continuing subsidiaries. They account for more than **98%** of Econocom's revenue.

The remaining non-significant subsidiaries or ones intended for sale have been approximated based on their operational expenses and activity.

2.7.2. CALCULATION OF SCOPE 1 AND 2 EMISSIONS

The calculation of scope 1 and scope 2 was carried out via a physical approach for the Group. We collected consumption data, for example:

- for fuel consumption (the main source of emissions in scope 1; on average this represents **94.7%** of scope 1). The data collected are in litres;
- for electricity consumption of buildings and data centres (main source of emissions in scope 2); on average this represents **79.5%** of scope 2). The data collected are in KWh.

The emissions of these scopes have been broken down into own use of the energy source and the energy manufacturing phase.

For own use, it corresponds on average to 82% for scope 1 and 67% 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).

Scope 1 & 2

	Econocom	Method
	Natural gas consumption	Calculated as kwh used
Scope 1	Consumption of thermal vehicles and/or other thermal sources	Calculated as kwh used
	Refrigerants	Calculated as surface area in m ²
Scope 2	Consumption of electricity from fossil, nuclear and/or renewable sources	Calculated as kwh used
	Use of electric vehicles	Calculated as kwh used

2.7.3. CALCULATION OF SCOPE 3 EMISSIONS

Scope 3

	Categories	Method
3.1	Purchases of goods and services	Calculated using data collected on purchasing amounts of each entity which are then allocated, according to a predefined ratio, between the use and manufacturing of products/services
3.2	Capitalized assets	Calculated using data collected on capital expenditures amounts by category, to which a specific emission factor is attributed
3.3	Upstream energy (scope 1 and 2)	Allocation keys used on gross amounts of scope 1 and 2 (resp. 17.9% and 32.1%)
3.4	Upstream transport and supply	Data collected to which specific emission factors are attributed
3.5	Waste generated during operations	Calculated on the basis of the ratio of waste generated by Econocom employees
3.6	Business trips	Data collected to which specific emission factors are attributed
3.7	Employee travel	Calculated based on the number of employees and average consumption for commuting
3.8	Upstream leased assets	Data collected to which specific emission factors are attributed
3:11.	Use of products sold	Calculated using data collected on purchasing amounts of each entity which are then allocated, according to a predefined ratio, between the use and manufacturing of products/services
3:12.	Treatment of end-of-life products	Calculated using data collected on purchasing amounts of each entity which are then allocated, according to a predefined ratio, between the use and manufacturing of products/services
3:13.	Downstream leased assets	Calculated using data collected on purchasing amounts of each entity which are then allocated, according to a predefined ratio, between the use and manufacturing of products/services

2.7.4. GROUP CARBON FOOTPRINT

[DP 47 - DP 52b]

The carbon assessment was carried out via a monetary approach by the Group in 2025.

Preliminary indications on the restated 2024 report:

- inclusion of adjustments made in 2024 and updating of assumptions and calculation methods;

- reintroduction of two entities held for sale in 2024 into the scope of consolidation in 2025. Their emissions are shown in the “Adjustments” line of the report.

GHG emissions – Scope 1& 2 (TCO ₂ eq)	2024 (restated)	2025
Gross scope 1 emissions	4,764.0	4,482.7
Gross scope 2 emissions (location-based)	1,382.7	1,282.2
Gross scope 2 emissions (market-based)	671.1	648.2
Total gross scope 1& 2 emissions (location-based)	6,146.69	5,764.9
Total gross scope 1& 2 emissions (market-based)	5,435.14	5,130.9

GHG emissions – Scope 3 (TCO ₂ eq)	2024 (restated)	2025
Goods and services purchased	709,703.5	744,529.2
Adjustments due to changes in scope of consolidation and other	582.8	3,428.9
Property, plant and equipment and intangible assets	645.3	1,335.5
Upstream scope 1&2 location-based	1,632.5	1,637.3
<i>Upstream scope 1&2 market-based</i>	1,258.9	1,337.6
Upstream transport and distribution	1,081.9	3,871.2
Waste generated during operations	903.6	893.6
Business trips	1,657.0	3,063.8
Employee transport	4,513.2	4,476.2
Upstream leased assets	1,773.9	6,382.5
Use of products sold	46,593.1	51,464.5
Treatment of end-of-life products	13,903.3	13,758.2
Downstream leased assets	27,022.8	19,738.6
Total gross emissions (location-based)	810,012.9	854,579.6
Total gross emissions (market-based)	809,639.3	854,279.9

	2024 (restated)	2025
Total GHG emissions – Summary (TC02eq)		
Gross scope 1 emissions	4,764.0	4,482.7
<i>Gross scope 2 emissions (location-based)</i>	<i>1,382.7</i>	<i>1,282.2</i>
Gross scope 2 emissions (market-based)	671.1	648.2
<i>Scope 3 emissions location-based method</i>	<i>810,012.9</i>	<i>854,579.6</i>
Scope 3 emissions market-based method	809,639.3	854,279.9
Total gross emissions (location-based)	816,159.6	860,344.4
Total gross emissions (market-based)	815,074.5⁽¹⁾	859,410.8

(1) The 2024 carbon footprint has been restated and therefore differs from the figure published at the end of 2024 (815,074 TC02eq compared to 804,295 TC02eq).

	2024 (restated)	2025
Total GHG emissions from activities held for sale.		
Total emissions of IFRS5	3,613.4	2,748.8

Econocom reduced its scope 3 by **5.4 %** between 2024 and 2025.

Part of this increase in scope 3 is due to the Group's external growth activities, through its acquisitions in 2025. The impact in terms of emissions is **11.1 KT C02eq**.

The monetary carbon footprint is correlated with the economic increase of the Group's activities. To put the increase in scope 3 in perspective, the Group's purchases increased by **5.6%**.

[\[DP 53\]](#)

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

	2024 (restated)	2025
Revenue (k€)	2,802,357.4	2,923,330.2⁽¹⁾
Carbon intensity (kgC02/k€)	290.85	293.9

(1) The revenue is presented in the Financial statements.

Additional physical analysis of the carbon assessment:

	2024 (monetary)	2024 (physical)
GHG emissions – Scope 3 (TC02eq)		
Goods and services purchased	709,704	747,557
Use of products sold	46,593	48,358
Downstream leased assets	27,023	19,660
Other categories	26,320	25,731
Physical inventory of purchase of IT assets	0.00%	71.20%
Scope 3 emissions market-based method	809,639	841,306

2.8. 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.

2.9. Internal carbon pricing [E1-8]

[\[DP 63a\]](#)

The company does not apply any internal carbon pricing mechanisms.

2.10. Expected financial effects of climate change [E1-9]

The group will gradually implement the new information requirements on the measurement of expected financial effects following the first publication. Appendix C of ESRS 1⁽¹⁾ provides that a company subject to these requirements has an exception from reporting quantitative elements for two years after the first publication of their sustainability report.

(1) In accordance with the new Appendix C of ESRS 1 of CSRD (disclosed as part of the “Quick Fix” amendment to the regulation in July 2025 concerning wave-one undertakings): “The undertaking may omit the information prescribed by ESRS E1-9 for a further two years after the initial publication.”

3. Resource use and circular economy [ESRS E5]

3.1. Materiality matrix and strategy for the circular economy

Econocom Group’s circular economy issues are focused mainly on the volumes of IT purchases of the distribution, services and leasing activities. Given the diversity of non-IT assets of the leasing business, no circular economy policy has been defined for this.

[DP 11]

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

The table below illustrates how the Group implements its sustainability strategy) to address the IROs identified in the matrix:

- which policies and **actions** address the **Impacts, Risks and Opportunities** identified?
- what **targets** are implemented for these actions in the future?

All the actions and targets are described in details in the following parts of the standard:

Sub-topics	Impacts, risks and opportunities [IRO 1]	Scope	Timeline	Details on IROs	Policies & Actions [MDR-P & MDR-A] ⁽¹⁾	Targets [DR E5-3 MDR-T]
Incoming flows of resources	Promotion of the circular economy Impact only	Direct activities + value chain	Medium and long term	Impacts (-) 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.	Increase in volumes of refurbished equipment via the acquisition at the beginning of 2025 of German company bb-net media GmbH .	Econocom has not yet set any specific targets for this.
Outgoing flows of resources	Optimization of uses through development of the economy of functionality Doubly material	Direct activities + value chain	Medium and long term	Impacts (+) Positive impact on product footprint (multiplication of uses) Risks Increase in costs associated with changes to the supply chain, R&D. Opportunities Better cost control through repairs/reuse.	Increase in the proportion of refurbished assets, internally and externally. Increase the number of assets under maintenance.	Triple the number of refurbished assets between 2023 and 2028 Double the number of assets under maintenance at our Product Care centres between 2023 and 2028

(1) [DP14] Since the group has very little transformation activity, the input resources are similar to the output resources. As a result, policies to reduce the group's impact in terms of new resource extraction are similar to policies to reduce end-of-life waste generation.

3.2. Measures and resources [E5-2]

[DP 19-20b – DP 20d]

• Increase 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 subsidiaries Econocom Factory and bb net media GmbH, and external reconditioning facilities.

Internally: Econocom Factory and bb-net media GmbH

The volume of assets repurposed by **Econocom Factory** and **bb net media GmbH** accounts for 1/3 (**128,000** and **125,000**, i.e. a total of **253,000 assets** in 2025) of assets reconditioned by the Group in 2025. The remaining assets are reconditioned or recycled by external partners.

[DP 20e – DP 20f]

Via external third parties

In addition to its own reconditioning subsidiaries, Econocom repurposes its goods and waste with important partners in its value chain. These assets sold to our partners below represent **493,379** 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 under maintenance via our Product Care centres

▶ **Product Care**

This offer is entirely dedicated to the eco-responsible management of mobile equipment: telephones, tablets and laptops. Product Care provides service for nearly **2.5 million terminals** for our clients.

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

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.

► **EcoCare**

This service offer, similar to the “Product Care” solution, provides additional cover for equipment in the event of accidental damage, while ensuring optimized management of the use cycle. By offering adequate coverage for telephones, tablets and computers, it promotes more sustainable, responsible use of resources and limits the cost of premature repairs and replacements. This approach contributes directly to extending the lifespan of equipment and improving the operating performance of the assets of the Econocom

Group’s clients. It includes a comprehensive service package:

- cover with repair or replacement in the event of theft or accidental damages;
- a complete after-sales service via the support service (ticket, helpdesk);
- logistics (collection, transport and returns).

► **The operational centre in Parçay-Meslay**

The Parçay-Meslay site is one of Econocom’s operational centres dedicated mainly to preparing, customizing and dispatching equipment for the Distribution businesses. It also has a repairs workshop.

In order to make optimal use of the Group’s sites and operations, the Parçay-Meslay workshop is only used for specific repair scenarios:

- handling substantial volumes, particularly for equipment such as desktop towers, printers or other large equipment;
- managing substantial unitary series requiring batch processing. (Product Care, on the other hand, focuses on continuous-flow repairs);
- handling customer requests requires a dedicated, secure environment that meets specific requirements.

3.3. Targets [E5-3]

[\[DP 23\]](#) & [\[DP 24\]](#)

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:

	2023	2024	2025 ⁽¹⁾	2028
Total number of refurbished IT equipment	493,000	504,570	746,379	1,500,000

(1) With the addition of the proportion of equipment refurbished via the subsidiary bb-net media GmbH as of 2025.

Increase the number of assets under maintenance via the Product Care offer:

Number of assets under maintenance	2023	2024	2025	2028
France	1,200,000	1,700,000	1,900,000	
Belux	N/A	N/A	42,175	
Germany	0	0	3,787	
Spain	14,820	16,000	20,000	
Italy	279,820	504,878	555,296	
Total	1,494,640	2,220,878	2,521,258	3,000,000⁽¹⁾

(1) In 2025 the target was adjusted following the increase in number of assets under maintenance via the Product Care offer. The Group has decided to increase the number of assets from 1.5 million to 3 million in 2028.

Circular economy targets deployed under the “One econocom” strategic plan were set **on a voluntary basis** (as opposed to in compliance with regulatory requirements) [DP27].

3.4. Incoming flows of resources [E5-4]

[DP 30]

Of the total IT equipment purchased by the Econocom Group, 87.5% was of new equipment for sale or leasing, while the remaining 12.5% was from circular circuits (see the tables below):

	2024	2025
Econocom Factory	43,873	20,804
bb-net media GmbH	0	102,955
Total purchases of the reconditioning activities (1)	43,873	123,759
Circular purchases of IT equipment by the leasing activities (2)	47,484	87,742
Circular purchases of IT equipment by the distribution activities (3)	11,980	12,399
Total circular purchases (1)+(2)+(3): 4	103,337	223,900
Total IT equipment purchases: 5	2,069,043⁽¹⁾	1,789,274
% of purchase of second-hand equipment in total IT purchases (4) / (5)	5.0%	12.5%

(1) The total volume of purchases in 2024 was revised this year. We have not included inter-company volumes of the TMF activities which were included last year. As a result, the volumes of second-hand equipment purchases for TMF have decreased from 83,990 to 47,484.

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 reconditioned assets are more relevant and easier to process by areas of responsibility.

3.5. Outgoing flows of resources [E5-5]

Summary of the volume of assets reconditioned by Econocom, **directly** or **indirectly** [DP35] :

	2024 ⁽¹⁾	2025
Total outsourced end of leasing contracts (1)	424,610	493,379
Econocom Factory	110,000	128,000
bb-net media GmbH	0	125,000
Total internal end of leasing contracts (2)	110,000	253,000
Total reconditioned assets (1)+(2): 3	534,610	746,379
Assets reconditioned by Econocom (2) /(3)	21%	34%

(1) The 2024 figures have been revised by the department in charge of monitoring the strategic plan, leading to an increase in the number of assets reconditioned internally and externally, from 88,573 to 110,000 and 415,997 to 424,610 respectively.

[\[DP 36a\]](#)

Average lifespan of products returned to the market⁽¹⁾

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

Given the multitude of IT equipment sold by the group, it is not possible for us to determine the sustainability and recyclability rates of all products or an average recyclability rate [DP36].

3.6. Expected financial effects of the circular economy [DR E5-6]

The group will gradually implement the new information requirements⁽²⁾ 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 three years of compliance.

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

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

4. Company employees [ESRS S1]

[DP 20]

Because people are its most valuable asset, the Econocom group's 8,682 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.

We strive to foster a climate of trust, engagement and well-being, which are essential for maintaining sustainable performance. To that end, Econocom has included in its "One Econocom" strategic plan ambitious employee well-being-related targets to guarantee a fair, inclusive and respectful working environment that promotes diversity, equal opportunities and non-discrimination.

In keeping with these commitments, the Econocom Group, as a European group, ensures it complies with the fundamental rights of the UN's Universal Declaration of Human Rights of 1948 and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work in all the countries it operates in. The Group's Ethics Charter reinforces these commitments across the value chain by monitoring relationships with suppliers, partners and clients. It sets out our commitment to responsible and sustainable governance and ensures that our actions comply with human rights, anti-corruption and environmental conservation, in line with our CSR objectives.

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. The Human Resources department was involved in the double materiality analysis process as representatives of the internal stakeholders (employees and management), for purposes of consulting, consolidating and arbitrating the expectations and concerns expressed.

It liaises directly with the countries and coordinates and facilitates the Group's industrial relations, working closely with the staff representative bodies and in compliance with the applicable regulatory frameworks. These structures are designed to ensure exchange of information between the Econocom group management and its employees.

(1) Workforce at 31 December 2025.

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, composed of representatives from the different countries the group operates in, is consulted each year on the annual report. The Group Committee, made up of representatives from different French subsidiaries, is informed each year of the development and annual or multi-year employment forecasts.

In addition to these bodies, industrial relations bodies are set up in the Group's other legal entities, in line with by local requirements. They ensure that the interests, opinions and rights of employees of each specific economic unit are taken into account.

In order to ensure an informed opinion, staff representatives have access to the reports published, financial statements and numerical data. They may mandate experts to carry out an audit in order to complete the analysis. Their opinion 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. The Group's social strategy in response to the impacts, risks and opportunities identified [ESRS 2 - SBM 3 ; IRO 1 ; MDR -P-A-T]

[\[DP 13\]](#) & [\[DP 14\]](#)

Econocom has a unique business model that coordinates and manages the full spectrum of expertise of digital transformation.

In accordance with the double materiality methodology, the Impacts, Risks and Opportunities (IROs) have been identified for the representative business lines:

- Services: user environment, infrastructures, applications, cybersecurity;
- Products & Solutions: distribution, audiovisual, after-sales services;
- Technology , Management & Financing;
- Reconditioning, Sales; Support functions.

Employees are exposed to different risks according to their business line: there are therefore two levels of governance to ensure an approach that is proportionate and adapted to the specific aspects of each activity.

The common basis of the Group's social strategy is rolled out in the "One Econocom" strategic plan which sets forth the governance objectives and commitments between now and 2028. The three HR commitments aim to guarantee diversity, inclusion of people with disabilities and well-being in the workplace.

Local HR policies, via collective agreements and action plans, are implemented to prevent any negative impacts and reinforce the positive impacts identified for each group of people.

The tables below show the link between the IROs identified in the matrix and the social strategy as translated into the One Econocom strategic plan as well as local policies and actions.

We answer the following questions:

- what are the potential impacts identified?
- which policies apply to the IRO identified and which actions address these policies?
- what targets are implemented for these actions in the future?

Issues	Impacts, risks and opportunities [IRO 1]	Scope [IRO 1]	Timeline [IRO 1]	Details of impacts [IRO 1]	Policies and Actions [DR S1 MDR-P & MDR-A]	Targets [DR S1 MDR-T]
Equal treatment opportunities for all	Employee diversity and inclusion	Direct activities	All timelines	<p>Impacts Unequal access to promotions, gender under-representation, social unrest.</p> <p>Causes Gender segmentation of professions, recruitment based on immediate skills, lack of a structured diversity policy.</p>	Group project as impact is overall: "One Econocom" strategic plan: - Gender Pay Gap. Diversity charter Group organization reference framework	Gender Pay Gap ⁽¹⁾ >90/100 by 2028. Implementation of the European directive on pay transparency.
	Fight against all forms of discrimination at work	Direct activities	Short term	<p>Impacts Psychological health of employees, legal and reputational risks, deterioration of industrial relations, lack of diversity.</p> <p>Causes Lack of prevention, training and awareness plans.</p>	Group project as impact is overall: Business Code of Conduct Whistleblowing platform United National Global Compact. Vocational training	Regular awareness campaigns: e-learning every 3 years. Systematic investigation of reports. "Zero tolerance" commitment.
	Employment and inclusion people with disabilities	Direct activities	Medium and long term	<p>Impacts Legal and reputational risks, reduction of the pool of qualified profiles, loss of commercial opportunities due to customer demands.</p> <p>Causes Lack of awareness of disability, inadequate inclusion of disability in HR processes</p>	Group project as impact is overall: "One Econocom" strategic plan: workers with disabilities. Local policies under a Group banner.	% of workers with disabilities > 6% by 2028. Recruit and adapt jobs.
	Adequacy of skills and development of training	Direct activities	Medium and long term	<p>Impacts Skills obsolescence, loss of job attractivity and longevity.</p> <p>Causes Rapidly changing professions and technologies.</p>	No group policy because local impact. Local commitments adapted to the specific aspects of each profession: training plan, financed certification (for example, AI), support with career development and internal mobility.	The Group aims to secure key skills, digital inclusion and AI.

(1) Gender Pay Gap according to an internal calculation methodology and not based on the pay gaps as defined by ESRS1, set forth below.

Sustainability report

Company employees [ESRS S1]

Issues	Impacts, risks and opportunities [IRO 1]	Scope [IRO 1]	Timeline [IRO 1]	Details of impacts [IRO 1]	Policies and Actions [DR S1 MDR-P & MDR-A]	Targets [DR S1 MDR-T]
Working conditions	Collective agreements (regulatory and non-mandatory)	Direct activities	All timelines	<p>Impacts Inconsistent practices, workplace accidents, absenteeism.</p> <p>Causes Different regulatory environments, depending on the size of the entity/ country, different levels of maturity of industrial relations.</p>	No group policy because local impact. Compliance with local regulations Agreements for each company or economic and social unit depending on the specific requirements beyond legal ones. Coordination and sharing of best practices for each country and Group-wide.	The Group aims to ensure better harmonization of HR practices in line with the One Econocom plan.
	Managing employees with non-permanent contracts	Direct activities	Medium and long term	<p>Impacts Lack of job security, acute exposure to social risks, decreased sense of belonging.</p> <p>Causes Seasonal nature of business, replacements and work placement contracts.</p>	No group policy because local impact. Compliance with local regulations and access to the applicable health & safety and working conditions. Monitor metrics on attrition rates and temporary workers.	The Group aims to have recourse to non-permanent contracts only for specific and justified cases and guarantee equivalent working conditions.
	Remuneration policy and social benefits (including value-sharing)	Direct activities	All timelines	<p>Impacts Perception of unfair treatment, attrition.</p> <p>Causes Managing legacy benefits, heterogeneous practices and cultural barriers.</p>	Group project as impact is overall: "One Econocom" strategic plan: - Gender Pay Gap. Group organization reference framework	Gender Pay Gap ⁽¹⁾ >90/100 by 2028. Implementation of the European directive on pay transparency.
	Quality of life at work (including work-life balance)	Direct activities	Short and medium term	<p>Impacts Health, stress, absenteeism and lack of engagement.</p> <p>Causes Work organization, intensity of certain activities, operational constraints and seasonality.</p>	Group project as impact is overall: "One econocom" strategic plan: Group health & safety policy. Local agreements and rules on working conditions. Regular performance and career reviews. Implementation of schemes to ensure well-being in the workplace.	Certification for one entity in each country by 2028. Continue initiatives to ensure well-being in the workplace, employee engagement and retention.

(1) Gender Pay Gap is according to an internal calculation methodology and not based on the pay gaps as defined by ESRS1, set forth below.

Issues	Impacts, risks and opportunities [IRO 1]	Scope [IRO 1]	Timeline [IRO 1]	Details of impacts [IRO 1]	Policies and Actions [DR S1 MDR-P & MDR-A]	Targets [DR S1 MDR-T]
<i>Other work-related rights</i>	Respect for human rights in our activities	Direct activities + value chain	Short and medium term	Potential impacts Human, legal and reputational risks. Causes Inadequate controls of the value chain	Group project as impact is overall: Business Code of Conduct Whistleblowing platform Signing of the United National Global Compact. The Group operates in Europe, with a low risk. But the importance of the issue is high.	Regular awareness campaigns: e-learning every 3 years. Systematic investigation of reports. "Zero tolerance" commitment.
	Safety and protection employees' personal data	Direct activities	Short and medium term	Impacts Invasion of privacy, legal and reputational risks. Causes Inadequate management of cybersecurity, handling errors, inadequate procedures, information and training.	Group project as impact is overall: Group data protection policy IT security policy and regular audits. Alerting employees to data protection	Maintaining and updating the processing register (purpose, retention periods, etc.). DPO's approval on all projects.

IROs concern all employees and non-employees, without distinction and regardless of their activity or geographical area.

The Group mainly employs qualified staff on permanent contracts. Non-employees or staff on non-permanent contracts are a minority and consist mainly of temporary staff hired to address seasonal demand.

Scope and rules for consolidating indicators

Workforce at 31 December 2025: The number of employees at 31 December 2025 and the breakdowns correspond to all the companies held at that date, including all the companies acquired in 2025.

Other indicators relating to S1: With the exception of the above-mentioned tables, all the indicators relating to S1 do not include employees of companies acquired in 2025.

Indicators on the strategic plan: The scope of the indicators analysed regarding the strategic plan does not include discontinued companies or companies acquired in 2025, in order to ensure comparability of data over time.

- 2024: Econocom Apps, Cloud & Data, Helis and Simstream were reintroduced into the scope of analysis.
- 2025: Synertrade remains a discontinued activity. The companies acquired in 2025 are also excluded.

4.3. Human Resources Policies and target [S1-1 and S1-5]

[\[DP 19 & DP 24 & DP 44 & DP 46\]](#)

The Group's Human Resources policy is central to the implementation of its strategy: it supports the Group's sustainable growth by establishing a common framework for all its activities, entities and countries.

It sets a clear, coherent, shared framework to manage all the Group's employees, while allowing a degree of local flexibility. The Group's Human Resources policy is made up of several key parts and contributes directly to managing impacts, risks and opportunities.

“One econocom” strategic plan.

Ambitious HR action plans have been set for each business line to achieve the Group's objectives by 2028, focusing on guaranteeing diversity, inclusion and quality of life in the workplace:

Econocom Apps, Cloud & Data, Helis and Simstream were included when the 2024 data was revised. Synertrade and the new acquisitions in 2025 have been excluded to ensure a comparable basis.

1. Guarantee an inclusive equitable employment model ensuring equal pay within the Group.

This indicator uses the same data as the ESR, indicator on gender pay gaps, but segments the groups of employees in order to compare salaries according to three levels of seniority (operational staff, middle manager and senior manager) and age group (estimation of professional experience). 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. A relevance threshold of 5% is applied to correct the discrepancies arising

from the market rates of comparable jobs. The categories should include all the professions so that any gender imbalance in certain job categories may be addressed. To ensure that the results of the Gender Pay Gap are representative, only countries with over 50 employees are covered by the strategic plan.

2. Developing an inclusive HR model focusing on the recruitment and retention of people with disabilities in the Group.

In France, the disability project, managed by Human Resources via its “Mission handicap” programme, increased the rate of staff with disabilities from 2.61% in 2018 to 6.06% in 2024. Following this success, the Group intends to extend the disability project to other countries and exceed the local legal requirements to ensure a rate of 6% group-wide by 2028.

In order to offer the best possible support to staff with disabilities, we apply the CSRD definition of delegated regulation (EU) 2023/2772 adopted on 31 July 2023, not local definitions. This includes people with long-term physical, mental, intellectual or sensory impairments which may hinder their full and effective participation in society on an equal basis with others.

Each country, depending in their existing situation, has launched a plan to achieve the target by 2028. The Group liaises with countries to share best practices for increasing awareness and discuss measures to implement to ensure easier integration of employees. We use a single logo to show everyone the Group's support.

This indicator is calculated, according to the terms of the DOETH in France, on the basis of number of employees. 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.

3. Ensure the well-being and engagement of these employees through an employee survey.

The results of which will enable us to improve company practices and promote the employer brand and attract talent. The Group aims to ensure “Happy at work” certification for one company in each country by 2028.

The targets of the strategic plan shown below are in line with the Group’s strategic directions. They are set, measured and tracked twice a year during HR committees and presented to General Management and staff representatives

	2024 ⁽¹⁾	2025	2028
Gender pay gap	93.5/100	93.3/100	> 90/100
Inclusion of people with disabilities ⁽²⁾	4.65%	5.35%	6%
HR certification	1	1	9

(1) 18 Figures published in the report in 2024: Gender pay gap: 92.1/100, Inclusion of people with disabilities: 4.6%, HR Certification

(2) Number of people, excluding companies integrated in 2025 and Synertrade.

The Diversity charter

In addition, Econocom is committed, by signing the Diversity charter, to promoting gender balance, diversity, equal opportunities and non-discrimination. Each candidate is selected on the strength of their skills alone. This applies to all the Group’s HR processes. No specific target has been set.

Business Code of Conduct

Formalizing ethical principles ensures integrity, transparency and fairness in the Group’s business dealings.

The Code of conduct is designed to prevent ethical, legal and reputational risks and provides a common reference framework. It includes the rules regarding respect for human rights, non-discrimination, preventing harassment, data and information protection and responsible use

of the Group’s resources. It also sets forth rules on conduct and risk situations.

These requirements also apply to third parties such as partners and suppliers all over the Group.

General Management is in charge of the code of conduct, and its operational coordination is carried out by the Ethics Committee, the Legal department and HR. Each manager is responsible for applying the code on a daily basis and all employees are obliged to comply with it.

Targets regarding human rights and non-discrimination are tracked throughout the year by a compliance body: the Ethics Committee. Aside from this committee, incidents can be reported via any channel.

	2024	2025	Target
Number of complaints filed	11	11	No target
Number of incidents of harassment or discrimination	2	3	0
Number of cases of human rights violations	0	0	0

United National Global Compact

Econocom strives to remain a responsible company and applies a proactive approach based on 10 principles. These 10 principles come

from the Universal Declaration of Human Rights, the Declaration of the International Labour Organization, the Rio Declaration on Environment and Development and the United Nations Convention Against Corruption.

The compact defines 10 principles, 6 of which relate to human rights: Promoting and complying with international laws on human rights, not being a party to human rights violations, respecting freedom of association and the right to bargain collectively, contributing to eradicate the use of forced or mandatory labour, contributing to eradicate child labour and contributing to eradicate any form of work-related discrimination.

These requirements also apply to third parties such as partners and suppliers all over the Group.

These values are upheld by the Group's Corporate Social Responsibility department. Most of Econocom's direct activities are conducted in European countries where such violations are unlikely. No specific target has been set.

Health and safety policy

This policy formalizes the Group's commitment to safeguard the health, safety and physical integrity of employees, both on its own and on its customers' premises. It is in line with applicable regulatory requirements and an occupational risk prevention approach.

The document includes the main guidelines for prevention, rules for health and safety in the workplace, managing occupational risks, training and certification for employees, use of collective and individual safety equipment and medical monitoring, as well as the procedures to apply in the event of accident, fire or emergency.

These rules apply to all staff and in general anyone acting on behalf of the Group. It covers all work situations, including business trips, use of equipment and specific or high-risk environments.

Overall responsibility for the document lies with Group General Management, while its operational coordination is handled by the Safety and Prevention department, in conjunction with Human Resources and managers. A team is in charge of employee training and risk identification and monitors 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.

All employees are required to comply with safety rules and report any risk situations or anomalies observed.

The target focuses on implementing measures to ensure safety and prevent risks.

IT security policy

This policy aims to protect employees' personal and professional data against any risk of violation of their confidentiality, integrity, availability or traceability. It is part of the Group's overall risk management approach and complies with regulatory requirements, particularly with respect to personal data protection.

It includes security rules and measures for HR data and tools, covering for example access management, protection of HR data, secure communication and data storage, traceability of access and actions, security incident management and informing employees of security best practices.

The policy only applies to companies connected to the Group's IT system. However, it does recommend that non-integrated companies should have an IT security policy. These measures also apply to third parties such as the Group's partners and suppliers. The IT department is in charge of managing and coordinating this policy.

The aim is to ensure security of IT systems and data protection in order to avoid any breaches of data confidentiality, integrity, availability or traceability.

Personal data security and protection policy

This policy formalizes the Group's commitment to guarantee employees' privacy and protect their personal data, in accordance with GDPR and applicable national regulations. It is part of the overall approach to governance of data and management of legal, operational and reputational risks.

The policy sets forth the fundamental principles of data protection (lawfulness, fairness, transparency, data minimization, purpose limitation, retention limitation, security and confidentiality). It covers processing of HR data (recruitment, administrative, payroll, careers, training, health & safety, IT access), technical and organizational security measures, employees' rights and procedures for incident management and data transfer.

These rules apply to all staff in general anyone acting on behalf of the Group. It also applies to third parties such as partners and suppliers. Overall responsibility for the policy lies with the Legal department (Data Protection Representative).

The targets regarding personal data security are set by the Data Protection Representative and subject to regular audits. Each department has a data protection representative in charge of ensuring the GDPR register is maintained and updated.

Local commitments

In addition to Group policies, guidelines and commitments are drawn up and rolled out at local level in the form of collective agreements negotiated with staff representatives, internal regulations defining a common, safeguarding framework, or action plans defining the guidelines and measures unilaterally implemented by the employer. For example, agreements regarding social protection cover our employees.

4.4. Process for exchanging with stakeholders [S1-2]

[\[DP 27\]](#); [\[DP 28\]](#)

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.

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 Group Committee

In France, the Group Committee, composed of representatives of different subsidiaries and the holding company, is informed each year on the Group's activity, financial situation, economic prospects and employment developments and forecasts.

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 Works Councils

Depending on the number of employees, some of the Group's companies are required to set up staff representative bodies to ensure good employee and industrial relations.

In Belgium:

The Works Council, the Committee for Prevention and Protection at Work and the Trade Union Delegation cover all the country's companies.

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:

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 (ESEDDB). 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. Remedial processes and alert channels [S1-3]

[DP 32] & [DP 33]

The remediation and repair process is defined in the whistleblowing system.

The staff representatives 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.

Employees can also directly use their right to alert.

If the solutions offered within the organization do not remedy the breaches mentioned, the conflicts may be brought before the country's competent courts.

For example, in France the dispute can be brought before the Prud'hommes, in Belgium the Tribunal du Travail and in Spain the Juzgado de lo Social.

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.

Furthermore, Econocom guarantees for whistleblowers (in accordance with the Business Code of Conduct G1).

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

[\[DP 37\]](#) & [\[DP 38\]](#)

4.6.1. DIVERSITY AND INCLUSION

Econocom implements a number of measures to promote gender parity through local initiatives such as:

- 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 under-represented. These include for example the signing of the #ReconversionFemmesNumérique manifesto.
- In the Netherlands and Italy, speaking opportunities for women are organized to give them increased visibility.

Some of these initiatives are focused on ensuring equal pay for comparable jobs:

- The Group is currently working on transposing the directive on pay transparency in order to draw up a job and skills reference framework and roll it out. This will enable easier understanding of the group's professions and the assessment and development of employees' careers;
- In France, Econocom Services & Solutions has set up a pay scale for the jobs of its 3,435 employees. A list of skills has been drawn up for each position and level of seniority. Since 20025, the company has also pledged to guarantee a minimum wage for employees with more than 18 months of service, in line with the market and above the contractual minimum wage. This measure ensures a decent salary for employees without compromising employability;

- In Spain, companies benefit from gender parity agreements, negotiated with the staff representatives in 2022. They have committed to conduct specific surveys on salaries to identify any pay gaps between the averages for women and men;
- In Belgium, the HR teams are streamlining pay reviews with objective, merit-based criteria and have consulted a benchmarking firm to categorize jobs;
- The Netherlands has also been working on a job reference framework to categorize jobs in a rational way.

Initiatives to support staff with disabilities

- In France, communication and awareness-raising actions on disability and the implementation of specific measures for staff with disabilities (e.g. additional paid leave days, specific, tailored support, workstation adjustments and Universal Service Employment Vouchers).
- In Spain, a working group called EconoCOM-PROMETIDOS has been set up for this purpose.
- Italy is promoting the employment of people with disabilities via a partnership with a certified social cooperative: Re Tech Life.

Local training initiatives have also been deployed to address specific needs: some companies have set up mentoring programmes (distribution business), while others have implemented certification schemes (Services) and others have set up in-house training facilities (financing activity).

4.6.2. WORKING CONDITONS

In terms of working conditions, local initiatives have been carried out to ensure long-term employee loyalty:

- As part of the Group “Back to Live” scheme started in early 2025, Econocom is committed to providing an optimized workplace for staff by renovating and refurbishing the offices. For example: renovations have been made at the new premises in Frankfurt in Germany, the break rooms in Lille, Tours and Saint Herblain have been renovated, a restaurant with terrace has been built at Puteaux in France and new offices have been built in Bilbao and Vigo in Spain.
- Awareness-raising actions on the need for exercise and a balanced diet have been deployed. For example, in France during Quality of Life at Work and Working Conditions Week, massage sessions and sporting events were organized in Belgium, Spain, the Netherlands and Morocco. In Germany staff have discounted access to gyms.
- As health is a priority, Econocom works with specialist service providers. For example, in France, via the “Welii” offer, staff benefit from a range of free services such as remote medical consultations and webinars on health. In Spain, staff can have free medical consultations via the “open salud” platform. Belgium works with Allan which provides health prevention tools in addition to the other health and insurance benefits on offer. 100% of employees benefit from social protection during key moments in their lives.

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 and absenteeism.

The HR representatives identify vulnerable groups of workers requiring special and reinforced monitoring, particularly with regard to their working conditions.

- factory workers in the reconditioning division;
- technicians and managers of call centres in service centres.
- Workers hired to address seasonal workload peaks.

Econocom applies local measures to address the needs of jobs exposed to risks:

- Operators:

Our reconditioning plant in Hérault in France won the EcoVadis Platinum medal in 2025 (Top 1%), which is a testament to our social and environmental commitment.

- Service Centres:

The service centre in Rabat, Morocco, was granted “Feel good 2025” national certification by Rekrute.com. This is awarded on the basis of quality of life in the workplace and career prospects.

The service centre in services de Grenoble now offers sessions with an occupational psychologist every 2 months.

- Jobs subject to seasonal peak loads:

In Germany Econocom has implemented a time management tool in order to monitor staff working hours.

In France, interviews on the work-life balance of staff employed on a daily basis are conducted.

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

4.6.3. RESPECT FOR HUMAN RIGHTS AND NON-DISCRIMINATION

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 guilty of such practices.

"Harassment" representatives are trained to support employees on these priority issues and are the designated contact people for employees in these situations. A whistleblower

platform at Group level allows incidents to be reported anonymously. Econocom also implements awareness-raising actions and offers general or specific training on the subject.

4.6.4. INFORMATION SECURITY

The Data Protection Officer defines the rules and processes to ensure compliance with the general data protection regulation. The DPO also manages a community of local correspondents. The Group's departments are regularly audited to ensure processes are kept up to date and rules are complied with.

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

[DP-50d]

The group's workforce is recorded as full-time equivalents as at 31 December, 2025.

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.

[[DP 50a]

The contracts included for the staff headcount are permanent contracts, fixed-term contracts and work-study contracts

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	2025
France	4,696	4,657
Benelux	664	631
Southern Europe ⁽¹⁾	2,822	2,864
Northern and Eastern Europe and the Americas ⁽¹⁾	265	530
Total	8,446	8,682

(1) The geographical breakdown is the same as the one presented in the notes to the consolidated financial statements, and includes in 2025 366 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)	2024		2025	
	Men	Women	Men	Women
France	3,637	1,059	3,606	1,051
Benelux	524	140	492	139
Southern Europe	2,069	752	2,078	786
Northern & Eastern Europe and Americas	146	119	375	155
Total	6,376	2,070	6,551	2,131

To study the most representative countries, we show a breakdown by country when there are more than 50 employees or 10% of the total workforce.

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⁾ (full-time equivalent)	2024		2025	
	Men	Women	Men	Women
France	3,637	1,059	3,606	1,051
Belgium	296	88	259	83
The Netherlands	197	47	199	50
Germany	77	44	258	77
England	42	20	58	29
Spain	1,304	434	1,336	481
Italy	603	185	601	187
Morocco	163	133	141	118
Total	6,318	2,010	6,458	2,076

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

DP-50b]

Breakdown of full-time employees by working hours and region (number of employees)	2024		2025	
	Men	Women	Men	Women
France	3611	975	3580	974
Benelux	489	100	453	99
Southern Europe	2014	685	2021	713
Northern & Eastern Europe and Americas	144	103	361	126
Total	6,258	1,863	6,415	1,912

Breakdown of part-time employees by working hours and region (number of employees)	2024		2025	
	Men	Women	Men	Women
France	38	107	39	99
Benelux	45	53	49	52
Southern Europe	78	87	76	94
Northern & Eastern Europe and Americas	4	23	25	49
Total	165	270	189	294

Breakdown of employees by type of employee contract (full-time equivalent)	2024		2025	
	Men	Women	Men	Women
Permanent contracts	6114	1991	6334	2052
Fixed-term contracts	110	43	102	51
Work-study contracts	152	36	115	28
Total	6,376	2,070	6,551	2,131

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-recognized

qualification. Work-study contracts are the equivalent to student contracts in Belgium.

Five members of staff working for Germany companies have contracts providing for a maximum of 43 hours of work per month with a minimum hourly wage of €12.41. This type of contract facilitates employment of people who have difficulty entering the job market.

[\[DP-50c\]](#)

Employee departures over the period (in number of employees)	2024	2025
Forced departures	1051	823
Voluntary departures	911	1,003
Departure rate	23.23%	21.5%

The departure rate represents 21.5% of the workforce, which is within the average range for the digital sector.

There has been a significant drop in forced departures, as confirmed by [the latest survey on Employment and pay in the digital sector](#) by Numeum, the research institute for the collective bargaining union of the French digital industry.

The employee departure rate corresponds to the proportion of total departures in the salaried workforce, including fixed-term contracts.

The most affected areas are Spain, Morocco and the Netherlands.

[\[DP-50f\]](#)

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)	2024	2025
Holding and support functions	193	194
Technology Management & Financing	620	650
Products & Solutions	2,240	2,554
Services	5,394	5,285
Total	8,446	8,682

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

These figures, calculated in full-time equivalents on 31 December 2025, differ from those presented in the [financial report](#), which are based on average annual headcounts.

4.8. Characteristics of the non-employees [S1-7]

[DP 55a]

Number of non-employees (average annual headcount)	2024	2025
Interns	28	42
Temporary	354	344
Providers	790	782
Hours not guaranteed ⁽¹⁾	5	
Sales agents	102	126
Belgian self-employed staff	15	12
Total	1,298	1,306

(1) These contracts are included in the workforce as of 2025.

[DP-55b]

To meet clients' needs effectively, Econocom has chosen an agile organization, combining in-house staff with external service providers.

The Group therefore relies on the following, depending on its requirements:

- temporary staff to cope with peak workloads;
- service providers to call upon specific expertise rapidly.

At the same time, Econocom has built a network of sales agents, who benefit from organizational freedom while developing a client portfolio with the support of Econocom (pre-sales, business experts, marketing, etc.).

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 workstation support (service desk, user support).

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

Social commitment ensures a high rate of coverage and harmonized practices across the Group.

Employees enjoy more benefits than the minimum required by law in the majority of the

Group. 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.

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

Collective bargaining agreement coverage rate	2024	2025
France	100.00%	100%
Benelux	92.65%	60%
Southern Europe	100.00%	100%
Northern & Eastern Europe and Americas	31.79%	29%
Total	97.28%	95%

Econocom has set up structured industrial relations mechanisms, both at local and European level, to ensure effective representation of employees in decision-making processes. [DP27a to 9.1.4.](#)

[\[DP 60 b\]](#) [\[DP 60c\]](#) [\[DP 63a\]](#)

Below are the details for the representative European countries.

Within this scope, 95% 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.

In the Netherlands, internal rules have been drawn up and shared in line with local regulations.

Collective bargaining agreement coverage rate – European countries ⁽¹⁾	2024	2025
France	100%	100%
Belgium	99%	100%
The Netherlands	0%	0%
Germany	52%	53%
Spain	100%	100%
Italy	100%	100%
Total	96%	95%

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

Collective bargaining agreement coverage rate – European countries ⁽¹⁾	2024	2025
France	100%	100%
Belgium	99%	92%
The Netherlands	0%	0%
Germany	52%	53%
Spain	100%	91%
Italy	100%	99%
Total	94%	94%

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

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 been included in a review of employees covered by staff representative bodies.

In accordance with the “Quick Fix” amendment to directive 2023/2772 adopted in July 2025, companies have an additional two years in which to disclose on the representation of employees in non-EEA countries.

[\[DP 61\]](#)

When a collective agreement concerns the working relationship between the company and its employees, it applies to all the employees, in keeping with the principle of equal treatment. However, objective eligibility criteria may be determined, concerning for example remote working, which does not concern all jobs and depends on the degree of autonomy of the job.

[\[DP 62\]](#)

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.

The working and employment conditions of non-employees 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.

We are not able to measure the coverage of non-employees working for us. These workers are covered by agreements, directly or indirectly, mainly via our subcontractors working in sectors regulated or governed by collective agreements.

[\[DP-63b\]](#)

Econocom encourages industrial relations at a number of levels: at Group-level with the European Works Council, at country level as in France and Belgium with the group committees, and at company level with the works councils. Employees may be represented via trade unions, as is the case in the United Kingdom.

These committees are detailed in [DP 27 a](#), [27 e](#) and [28](#).

4.10. 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 (number of employees)	2024		2025	
	Men	Women	Men	Women
Number	81	19	71	20
Percentage (%)	81%	19%	78%	22%

Managers of P&Ls and group directors are included in the Management.

Women are often under-represented in the digital sector. The percentage of women in the digital market in the European Union in 2024 was 19.5%; according to Eurostat⁽¹⁾.

At Econocom, the proportion of women in digital-related roles is 18%. In other functions, women represent 48% of the workforce. These figures have remained stable since 2024.

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

- 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.
- In the Netherlands and Italy, speaking opportunities for women are organized to give them increased visibility. In largely male-dominated professions, recruitment processes in Spain and the Netherlands have been reviewed to become more impartial.

Breakdown of employees by age group (number of employees)	2024				2025			
	Men		Women		Men		Women	
		%		%		%		%
Beyond 30 years	1,302	79%	349	21%	1,281	79%	349	21%
30-50 years old	3,537	74%	1,220	26%	3,622	74%	1,300	26%
Beyond 50 years	1,538	75%	502	25%	1,701	75%	557	25%
Total	6,376	75%	2,070	25%	6,604	75%	2,206	25%

4.11. Equal Pay [S1-10]

[DP 69]

In accordance with European Directive 2022/2041, the Group is committed to ensuring a decent wage for its employees. 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 and benefits in kind, all of which are guaranteed. 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 Organization) were used as a reference.

(1) Eurostat is the statistical office of the European Union.

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 (for 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	2024⁽¹⁾	2025
% of employees below decent wage	0.46%	1.05%

(1) 2023 Data from the 2024 report: 0.33% including the variable.

Adequate wages are reviewed on an annual basis based on the latest figures available on the average national wages of the previous year. We ensure that legal minimum wages are observed. When using systems designed to facilitate employment of people having difficulty entering the job market, or concerning manual labour, the salary may be slightly below the legal living wage as described earlier. In Spain, discontinued contracts to promote workforce reintegration; in the Netherlands, differential levels of minimum wages for young workers; in Germany, zero-hours contracts called “mini-jobs”; in France, employees with manual labourer status based in Hérault, paid the minimum wage for their job type.

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.

4.12. Social protection [S1-11]

[DP 74]

The 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.

4.13. 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.

People with disabilities include people with long-term physical, mental, intellectual or sensory impairments which may hinder their full and effective participation in society on an equal basis with others, as defined by CSRD.

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, which can result in discrepancies between mandatory local declarations and this monitoring

The rate increased from 4.6% in 2024 to 5.3% in 2025 for all the companies, excluding those acquired in 2025.

Social inclusion (number of employees)	2024		2025	
	Men	Women	Men	Women
% of workers with disabilities	4.22%	5.77%	4.84%	6.65%

4.14. Training and skills development [S1-13]

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 personalized 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 Services & Solutions 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 organization and operations of their agency. Onboarding afternoons are organized at the service centres every two weeks.

Attracting talent	2024	2025
Number of group recruitments	1,984	1,795

For companies integrated in 2025, entries were recognized from the acquisition date to the end of the year.

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

- 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. HR studies requests. Employees can also apply for internal job openings.

[DP-83b]

The Econocom Group supports career development by offering employees a wide range of training options throughout their career with the group.

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

- In all countries, training sessions for sales staff called "Sales Academy" are held to provide information on the group's offers.

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 examines the level of skills assessed during the annual appraisals in order to identify what training is needed for staff to remain in employment. Since 2023, e-learning licences have been granted to employees of the Services activity via the UDEMY platform. Furthermore, since 2025, the 360 Learning solution enables employees to obtain certifications, for example in AI, through a collaborative training platform.

- In Belgium: competence centres have been set up with programmes for acquiring, developing and monitoring skills;
- Morocco: an in-house training school has been set up. A NEXTHINK skills centre is also under development;
- Spain: a vocational training management tool has been rolled out. Technical training courses via UDEMY are also under development.

Skills development	2024		2025	
	Men	Women	Men	Women
Average number of hours of training per employee	11	10	9	8

The reference scope has changed with the gradual introduction of new entities benefiting from monitoring of training hours, for example in Belgium. Conversely, some entities do not as yet have any centralized system for monitoring training hours and as such are not included in the scope. This is the case for the Netherlands, for example, which was unable to contribute to this report for the year in question.

[[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. The 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. A common tool is used for France, Belgium and

Morocco to communicate on and coordinate annual appraisal campaigns.

These performance reviews are mandatory and occur at a multi-year frequency that varies from country to country.

Participation in performance evaluation and career interview	2024		2025	
	Men	Women	Men	Women
% of employee participation	51.85%	55.17%	61.80%	62.95%

4.15. Health and safety in the workplace [S1-14]

[DP 88a - DP 88e]

Health and Safety (full-time equivalent)	2024		2025	
		%		%
Employees covered by a health system	8,362	99.00%	8,202	97.83%
Deaths due to occupational causes	0	0.00%	0	0.00%
Occupational accidents (including deaths)	121	1.43%	98	1.17%
Number of work-related illnesses reported during the period	61	0.00%	1	0.01%
Number of days lost due to a work-related illness			117	0.00%
Number of days lost due to an occupational accident	3,962	0.13%	3,575	0.12%
Frequency of occupational accidents			6.06	

The risk of occupational accidents concerns everyone; thus, every two years, employees are trained in first aid and firesafety.

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 2025, Econocom has for example:

- Organized initiatives to fight breast cancer as part of the "Pink October" and "Movember" programmes in France and Belgium;

- provided on-site gyms or Gymlib services to subsidize employees' sports memberships for Helis in France and employees in Germany;
- run workshops to inform staff about the importance of healthy eating and a work-life balance in France.

Organized sessions with an occupational psychologist every 2 months for employees at the Grenoble service centre in France

In accordance with the new Appendix C of ESRS 1 of CSRD (disclosed as part of the "Quick Fix" amendment to the regulation in July 2025 concerning Wave-one undertakings): "The undertaking may omit the information prescribed by ESRS S1-7 for a further two years after the initial publication".

4.16. Work-life balance [S1-15]

[DP 93a - DP 93b]

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 at work label, awarded to Exaprobe for the third year running, is a testament to employees' satisfaction with their working conditions, their quality of life at work and their work-life balance.

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	2024		2025	
	Men	Women	Men	Women
% of eligible employees	99%	99%	98%	94%
% of beneficiaries	9%	13%	19%	21%

4.17. 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 Eurostat⁽¹⁾, in 2023, the unadjusted gender pay gap was 12% to the disadvantage of women.

According to the Numeum 2024 study, in digital service companies in France the unadjusted pay gap is 7.3% and the residual gap is 2.4%. This is largely explained by the poor representation of women in high positions.

According to the International Labour Organization, 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.

Thus, Econocom, as part of its strategic plan, has committed to monitoring the pay gap between men and women using a detailed methodology, based on the French professional equality index, and defines, locally, action plans to reduce the pay gap between women and men.

(1) Eurostat is the statistical office of the European Union.

All Human Resources teams are kept apprised of these issues through procedures summarizing 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.

The indicators are 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.

Benefits in kind, beyond the local legal requirements, are also included in the overall pay indicators.

Nature of compensation	2024	2025
Average salary of women compared to men	96%	94%

[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 of the pay gaps between employees and the Group's manager.

The reference scope is consolidated at Group level. The results should be qualified because Econocom operates in countries where there are large discrepancies in terms of purchasing power.

To offset the effects relating to purchasing power, we also show the ratio for France, which is the Group's most representative country, accounting for 54% of the workforce.

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.

Ratio of compensation of the highest paid employee to the median compensation of other employees (%)	2024	2025
Group ratio		42.64
France ratio		17.46

[DP 97c]

In France, the gender equality index calculated in 2025 for the year 2024 is 89/100. The 2026 index will be published on the website in March 2026.

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).

[DP 98]

Gender pay gap	2024	2025
France	106.78%	106.20%
Benelux	98.20%	95.59%
Southern Europe	83.26%	80.40%
Northern & Eastern Europe and Americas	56.13%	61.64%

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.

4.18. Human rights incidents and complaints [SI-17]

[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,

The Group score published [on the website](#) corresponds to this methodology and adapted for the international scope.

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.

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.

[\[DP 102\]](#)

The Group is committed to fully respecting the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the Organization 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)	2024	2025
Number of incidents of harassment or discrimination	2.00	3.00
Number of complaints filed	11.00	11.00
Number of complaints to National Contact Points	0.00	0.00
Total fines, penalties and compensations	0.00	0.00

Eleven complaints were filed by employees across the Group via two channels: the whistleblowing platform and reporting to HR.

Following investigation, three incidents were proven and the employees were disciplined.

[\[DP 103c\]](#)

No fines were issued.

[\[DP 104a- DP 104b\]](#)

Human Rights⁽¹⁾	2024	2025
Number of breaches of employee rights	0	0
Where applicable, context necessary for understanding the data	0	0
Total fines, penalties and compensations	0	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.

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 MATRIX AND MATTERS [ESRS 2 SBM 3]

[DP 10a]

Sub-topics	Impacts, risks and opportunities [SBM 3 & IRO 1]	Scope	Timeline	Details on IROs	Policies & Actions [MDR-P & MDR-A]	Targets [DR E1-4 MDR-T]
<i>Other rights relating to value chain workers</i>	Respect for human rights at suppliers and their subcontractors	Value Chain (upstream)	Medium and long term	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. (-)	Implementation of a code of conduct Implementation of an ethical whistleblowing system	EcoVadis ratings contribute to the achievement of the group's strategic objective of obtaining the EcoVadis Platinum medal.
<i>Working conditions of value chain workers</i>	Working conditions of suppliers and of their subcontractors	Value Chain (upstream)	Medium and long term	Impact (-) Potential impact on health and security within the value chain (supplier) (-)	Implementation of the Responsible Purchasing Charter	EcoVadis ratings contribute to the achievement of the group's strategic objective of obtaining the EcoVadis Platinum medal.

The potential negative impact of violations 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.

[\[DP 11a\]](#)

Hardware purchases are made from wholesalers/resellers or hardware manufacturers/software vendors recognized 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 categorized 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, where there is a potentially high risk of child labour, forced or mandatory labour.

[\[DP 11e\]](#)

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]

(1) The TMF activity operates mainly through external refinancing from banking institutions.

(2) Depending on the geographical areas.

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 materializes.

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.

[DP 12]

By taking the representation of our workers in our value chain illustrated in **DP 11a** 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	X		
Trade unionists	X		
Temporary workers	X	X	
Migrant workers	X		

[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. RESPECT FOR HUMAN RIGHTS AT 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.

The Code of Conduct for External Affairs covering the following subjects:

- 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 measures 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. WORKING CONDITIONS SUPPLIERS AND OF 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 Organization (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/critical suppliers, who are required to sign it to confirm their commitment to respect it.

The CSR department monitors compliance with the commitments formalized by the signing of the Responsible Purchasing charter. Suppliers are given a period of three months after the initial request in which to sign the charter. This rigorous monitoring ensures our partners' effective compliance with our requirements with respect to social, environmental and ethical responsibility, so that, gradually, our whole value chain will be aligned with our CSR commitments.

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 organize 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 handle and take into account the points of view of workers in the value chain.

- Whistleblowing system

In order to prevent and address any potential breach in our value chain, we have set up a whistleblowing platform, available to all our stakeholders. This tool is available both on our external website and Intranet, and enables employees to report any situation that causes concern.

To date, no incidents concerning workers in our value chain have been reported via this platform. Nevertheless, this tool meets our objective of implementing an operational, accessible secure (particularly where whistleblowers are concerned) tool, so that any incidents can be reported at any time.

We are particularly vigilant and encourage all our stakeholders to use this system whenever required, so that we may rapidly identify any risk and take appropriate action.

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).
- the EcoVadis tool, which enables us to interact indirectly with workers by evaluating their employers' (our suppliers) practices. The results of the EcoVadis assessments are shared with suppliers, and we encourage them to involve their staff in the continuous improvement process.

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>. Actions and resources for value chain worker policies [S2-4].

[DP 22a – DP 22e]

The 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 platform: <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.

We also use EcoVadis Ratings to monitor completion of actions by our network of Econocom suppliers and assess the average performance of our network from one year to the next. This enables us to compare our performance with the average score of the EcoVadis network in the area of Work & Human Rights. It also helps us to track and show improvements in the protection of workers in our value chain.

5.5. Communication channels and negotiation processes to address negative impacts and allow value chain workers to voice their concerns [S2-3]

[DP 27]

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.

In addition to our whistleblowing platform, we can also report incidents via EcoVadis's 360 Watch tool, so we can rapidly identify any issues and take appropriate corrective measures. We also apply their recommendations to monitor suppliers' progress and help them improve.

[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.

5.6. Measures and resources [S2-4]

[DP 30]

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:

[DP 32a; DP 32b]

5.6.1. A ACTIONS AND RESOURCES TO PREVENT AND MITIGATE NEGATIVE EFFECTS OF HUMAN RIGHTS BREACHES

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 details the procedures for launching and conducting internal investigations; it also specifies the process for handling proven breaches.
- EcoVadis – 360 Watch: Human Rights
 - ▶ The 360° Watch is one of **seven indicators** (Policies, Endorsements, Measures, Certifications, Coverage, Reporting, 360° Watch) used by EcoVadis in its methodology.

- ▶ Its role is to collect external information (media, NGOs, trade unions, compliance databases, sanctions) on the company assessed in order to identify any relevant events (positive or negative) relating to Work & Human Rights, the Environment, Ethics and Responsible Purchasing.

- ▶ The system combines **artificial intelligence** (scanning hundreds of thousands of sources) and **human analysis** (CSR experts) to determine the relevance of a finding (event) and its impact.

- ▶ The results are entered in a company scorecard: when an event is considered significant, it may lower or raise the score in a particular area (e.g. Human rights).

In the EcoVadis assessment, “Labour & Human Rights” is a pillar in its own right. 360° Watch has a specific role for this topic:

- ▶ Negative findings (e.g. Human rights breaches, forced labour, serious discrimination, public condemnation) can have a major impact on the score for this topic.

- ▶ EcoVadis states that by default, 360° Watch is awarded a score of 75/100 (for a topic) if no controversies arise. In the event of negative events, however, points are deducted (-5.25 points for a minor case, -10.5 points for a major case, -15.75 points for a severe case).

Thus, EcoVadis does not simply accept that a written policy exists: it checks that commitments are really effective in practice and whether the company is involved in any controversies relating to working conditions.

For buyers or CSR managers, this approach is an important due diligence tool for securing the supply chain and identifying labour-related risks. In addition to internal declarations, information from 360° Watch brings external validation.

5.6.2. ACTIONS AND RESOURCES TO PREVENT AND MITIGATE THE NEGATIVE EFFECTS OF VIOLATIONS OF WORKING CONDITIONS

The ethical alert system is completed with the following additional levers which mainly concern working conditions:

EcoVadis – 360 Watch: (Working conditions)

360° Watch is used to complete and verify the information declared. When a negative case is identified - for example, dangerous working conditions, health and safety breaches, excessive or unpaid hours, exploitation or discrimination -this can directly impact the Work & Human Rights score and prevent the company from obtaining a EcoVadis medal.

- **Data Legal Drive**

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).

[\[DP 33a\]](#)

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 value chain 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.

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

Only the suppliers of the Group's Services activities are required to sign the Responsible Purchasing Charter as this is the only operational sector where Econocom can choose its partners.

As a reminder, for the distribution and leasing activities, it is the Group's clients who select their suppliers.

Responsible Purchasing (Services activity)	2024	2025
Signatory suppliers	100%	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 as the first action plan.

[DP 36] & [DP 38]

We use the results of 360 Watch to identify individual incidents occurring in our supply chain. To date, no negative incidents have been identified by our suppliers.

When a significant and hazardous individual incident is identified with one of our suppliers, the matter is immediately reported to the governing bodies. An Ethics Committee meeting is then held to examine the situation and decide on appropriate action plans. The key elements and decisions made are then reported to the Comex, which decides on subsequent action. This procedure guarantees thorough, consistent handling of issues in line with our values and ethical standards.

On the EcoVadis platform, we can look at our suppliers' average scores for the various topics. These average scores do not yet cover all our strategic/critical suppliers, as some have either not yet begun the EcoVadis assessment process or are currently being reassessed.

At end of 2025, the overall average score for all the topics assessed by EcoVadis with our strategic/critical suppliers was **75.68/100**, whereas the average score for companies in the digital sector is **55/100**.

At end of 2025, the average score of our strategic/critical suppliers was 72.25/100 for the Social aspect, whereas the average score for companies in the digital sector is **58/100**.

(1) The explanation given for the TMF activity will be essentially the same for the other countries as the activity is the same (apart from certain specific aspects depending on the assets leased or type of contracts).

360° Watch reported, in the Econocom network, negative feedback on the following subjects:

- employees for 20% of the suppliers in the Econocom network;
- working conditions for 20% of the suppliers in the Econocom network;
- Industrial relations for 8% of the suppliers in the Econocom network;
- Discrimination for 8% of the suppliers in the Econocom network.

At end of 2025, the average score of strategic/critical suppliers assessed for Econocom group for Ethics was 67.5/100, whereas the average score for companies in the digital sector is **53/100**.

Ecovadis 360 Watch is managed by the CSR department, in conjunction with other key departments such as Purchasing.

5.7. Targets defined [S2-5]

[DP 39; DP 41; DP 42]

We have set a clear target:

Increase the overall average EcoVadis score for all our strategic/critical suppliers to **80/100 by 2028**.

Furthermore, thanks to our **EcoVadis Rating platform**, we will be able to **monitor their progress regularly** via EcoVadis assessments and the associated **action plans**.

[DP 45-47]

Monitoring indicators and targets:

Indicators	Target	2025 result
% of suppliers with a score of over 70/100 for the entire EcoVadis scope.	100% of our suppliers in the EcoVadis platform must have a score of over 70/100 by 2030.	68.8% of our suppliers have a score of over 70/100 in all areas.
% of suppliers with a score of over 70/100 for the environmental part.	100% of our suppliers in the EcoVadis platform must have a score of over 70/100 by 2030 for the environmental part.	87.5% of our suppliers have a score of over 70/100 for the environmental part.
% of suppliers with a score of over 70/100 for the human rights part.	100% of our suppliers in the EcoVadis platform must have a score of over 70/100 by 2030 for the social and human rights part.	68.8 % of our suppliers have a score of over 70/100 for the social and human rights part.
% of suppliers with a score of over 70/100 for the ethics part.	100% of our suppliers in the EcoVadis platform must have a score of over 70/100 by 2030 for the ethics part.	50% of our suppliers have a score of over 70/100 for the ethics part.
% of suppliers with a score of over 70/100 for the responsible purchasing part.	100% of our suppliers in the EcoVadis platform must have a score of over 70/100 by 2030 for the responsible purchasing part.	81.3% of our suppliers have a score of over 70/100 for the responsible purchasing part.
% of purchasers targeted who received training on responsible purchasing via the EcoVadis Academy platform.	100% purchasers targeted must have undergone training on responsible purchasing via the EcoVadis Academy platform by 2028.	So far, 0% of our purchasers have received training on responsible purchasing via the EcoVadis Academy platform.

6. Business Conduct [ESRS G1]

6.1. ESRS 2 General information standard data ESRS 2 [GOV-1 & IRO-1]

[\[DP 5a\]](#)

As previously discussed in the general disclosure standard ESRS 2 GOV -1, the role of administrative oversight and decision-making bodies with respect to the conduct of business is described in the chapter "Corporate Governance".

[\[DP 5a\]](#)

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:

- monitoring the application of internal procedures and ethical principles by everyone and at every level;
- ethics-related issues;
- processing and monitoring reports received via the whistleblowing system;
- managing conflicts of interest.

The Ethics Committee is always separate from the Management chain involved in the case.

The Ethics Committee is an independent body. The General Counsel and Chief Compliance Officer report directly to the CEO and regularly report on projects and matters as part of the monitoring of the French Sapin II law.

[\[DP 6\]](#)

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.

6.2. 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, 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 organization.
- 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 and regular training.

The Code of Conduct, whistleblowing system and all the associated procedures were reviewed in 2025 to include the risk scenarios identified in the risk map carried out in 2024. The Code now includes practical cases and a list of do's & don't's.

All the procedures have been updated to ensure consistency with the risk map and the requirements of the French Anticorruption Agency (FAA). The following have been added:

- revision clauses for procedures;
- a specific appendix on commercial challenges stipulating the rules regarding gifts and invitations;
- thresholds for donations, patronage and sponsoring have been revised in line with current practices;
- forms for declaring gifts & invitations and conflicts of interest and a timeline for declaration campaigns have been added to the procedure.

The whistleblowing procedure has also been reviewed to reflect the specific situations in each country.

In accordance with the requirements of the French Sapin II law, the Code of Conduct is appended to the internal regulations.

The new version was sent by the CEO to all the Group's employees on 20 November 2025 and published on the Intranet and internet, and is now being rolled out in all the group's countries. All the documents have also been sent to entities without access to the OneLink Intranet (Econocom Exaprobe, Synertrade, Héliis, Apps Cloud & Data, Econocom Factory).

[\[DP 10b\]](#)

The Econocom group has implemented anti-corruption policies. In France, the policies in place comply with the requirements of the Sapin II Law and FAA recommendations. 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.

[\[DP 10c\]](#)

The whistleblower can report incidents through a choice of channels. However, we recommend they use the confidential, secure whistleblowing platform. Incidents may also be reported by post, email, verbally, or any other means.

Alerts can also be made to the following people, unless they themselves are the alleged perpetrator of the incident reported:

- The person's direct or indirect manager;
- The HR contact;
- The Group Compliance Officer;
- The Group Legal Counsel;
- The Group Ethics Committee.

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, lay-off, dismissal, demotion or refusal of promotion, etc.;
- the confidentiality of their identity and the facts reported.

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.

[\[DP 10e\]](#)

In addition to the Code of Business Conduct, the Econocom group has two procedures for managing incidents:

- The whistleblowing system
- Procedure for investigating and handling breaches. This 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.

(1) The person must be a whistleblower as defined by the Sapin II law.

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.

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[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 2025, the platform recorded seven alerts. They did not result in any lawsuits or prosecutions.

N.B. 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.

Face-to-face training was already provided in 2025 for vulnerable people (Managers, sales staff, agents, etc.)

	2023	2024	2025
Percentage of training on ethics (target: all employees)	68%	71%	72%

There was a 1-point rise in anti-corruption training.

[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.

The risk map highlighted the need for particular attention to the monitoring of sales agents, subcontractors providing intellectual services, and equipment loaned to customers.

It should be specified that each country implements its compliance programme in accordance with group directives, while maintaining its specific local characteristics. This is the case in Spain and Italy who have adapted the anti-corruption programme to local regulatory and operational requirements.

Action plans were implemented and deployed in 2025. They concern more rigorous measures for assessing third parties, agents and accounting audits, matters which were identified as high-priority in the risk map.

These are action plans deployed in 2025 and 2026, in order to allow gradual implemented. They have been adjusted in light of the conclusions of the internal audit carried out by an external firm at the end of 2025, and the areas of improvement identified concerning the assessment of third parties and accounting audits to ensure greater operational efficiency as part of the continuous improvement approach.

6.3. Supplier Relationship Management [G1-2]

A partner is any person, group, local authority, organization 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 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 inter company payment terms).

[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. To that end, we assess our third parties using screening tools, with an additional due diligence questionnaire in the event of any risks identified.

The third parties identified as posing a particular level of risk may be subject to monitoring and tracking measures throughout the contractual relationship (e.g. payment checks, stricter contract clauses, monitoring via the tool, supporting documents, etc.).

Lastly, our contracts include compliance clauses enabling the group to request audits of our third parties or terminate the relationship in the event of proven compliance breaches.

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 rduring 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: formalize 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.

The risk of supply chain disruption is a direct result of Econocom's dependence on certain suppliers and subcontractors who are strategic for the continuity of its activity. Supplier default (financial, operational, regulatory or ESG) could lead to service interruption, financial and reputational impacts, as well as implications in terms of sustainability.

Supplier relationship management is thus part of controlling this risk, beyond mere contractual monitoring. The procedures in place (third party assessment, compliance, monitoring strategic suppliers and continuity measures) are designed to identify, prevent and mitigate risks for the company related to its supply chain and their impacts on sustainability issues, in accordance with ESRS requirements.

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.

[\[DP 15a\]](#)

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).

[\[DP 33a\]](#)

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.

[\[DP 33b\]](#)

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.

6.4. 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 authorized 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 recognized 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. They cover in detail corruption risks, their consequences and the procedure to follow.

Regular reminders are sent as part of communication about the whistleblowing system, which also helps employees understand the issues (see [DP 10g] du 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 72% (regular reminders are sent).

[\[DP 21b & DP21c\]](#)

In 2025, Econocom continued to roll out a structured, targeted gradual programme of anti-corruption training covering all French entities as well as certain key groups of employees and ones exposed to risk in other countries, as required by the Sapin II law and recommendations of the French Anticorruption Agency (FAA).

The training and awareness initiatives mainly concern the prevention and detection of corruption and influence peddling, and may be completed, depending on the people concerned, with specific modules on assessing third parties, using the screening tool, international sanctions and export control, as well as related matters such as gifts and invitations, conflicts of interest, fraud and audits.

Training was provided jointly by specialist firms and the Legal department's Compliance Officer in order to ensure first-rate technical expertise and alignment with the group's internal procedures.

The scope of these training courses was determined after the corruption risk map drawn up in 2024, and chiefly targeted employees in strategic positions or ones exposed to risks: sales staff, heads of business lines, agents, support functions (finance, purchasing, communications, IT), and the business line employees in charge of third-party assessment. Specific sessions were also held during the Sales Academy for new hires.

A total of 17 training and awareness actions were carried out in 2025, covering all the entities and professions. This training plan also covers a significant number of the functions within the group identified as high-risk.

6.5. 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. 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.

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 2025. 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 capitalized for tangible and intangible assets;
- operating expenses are defined as direct costs that cannot be capitalized and include research and development costs, building renovation costs, maintenance and repair costs, leases recognized 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 2025 financial year, Econocom identified seven eligible activities:

Goals	Classification of economic activities	Description for Econocom	NACE codes
Climate change mitigation	9.3 Specialized 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. Providing 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	<i>Product Care</i>	C27
	5.3. Preparation for reuse of end-of-life products and product components	<i>Econocom Factory, bb net media GmbH</i>	C27
	5.5. Products as services and other circular service models focused on use and results	<i>Technology Management & Financing</i>	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 fully held 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 Organization 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. Specialized 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. Providing 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 specializing 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.

In 2025, Econocom acquired a new company specializing in IT equipment refurbishment: **bb-net media GmbH**. As a refurbishing company, this company meets the same alignment criteria as Econocom Factory.

- 5.5. Products as services and other circular service models focused on use and results.

Technology Management & Financing activities fulfil 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 prioritize 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. Specialized 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. Providing 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.

Both reconditioning activities implement 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.

Sustainability report

Regulation: European green taxonomy

a. Revenue

See note 4.1. of Chapter 8 “Financial statements”: the 2025 revenue amounts to €2,923.3 million.

in € millions

Substantial contribution criteria

Economic activities	Code(s)	Absolute revenue	Proportion of eligible revenue	Climate change mitigation	Climate change mitigation	Aquatic and marine resources Circular economy	Circular economy	Pollution	Biodiversity and ecosystem
A. ACTIVITIES ELIGIBLE FOR TAXONOMY									
A.1 Sustainable activities									
8.1 Data processing, hosting and related activities	8.1	15.00	0.51%	100%					
9.3 Specialized services for the energy performance of buildings	9.3	2.17	0.07%	100%					
Providing data-driven IT/operational solutions	4.1	0.00	0.00%				100%		
Repair, overhaul and remanufacturing	5.1	22.07	0.75%				100%		
Preparation for reuse of end-of-life products and product components	5.3	35.52	1.22%				100%		
Products as services and other circular service models focused on use and results	5.5	220.61	7.55%				100%		
Marketplace for the trade of second-hand goods intended for reuse	5.6	0.10	0.00%				100%		
Revenue from sustainable activities (A.1)		297.7	10.1%	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)		297.7	10.1%						
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY									
Revenue from activities not eligible for taxonomy (B)		2,627.9	89.9%						
Total (A + B)		2,923.3	100.0%						

(1) The Revenue from activity 5.5. of the taxonomy (TMF activity) depends on the nature of the contracts entered into during the period.

Sustainability report

Regulation: European green taxonomy

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 – 2025	Category (enabling activity)	Category (transient activity)
	YES	YES	YES			YES			T
	YES					YES	0.51%	H	
	YES	YES		YES	YES	YES	0.07%		
	YES	YES		YES	YES	YES	0.00%		
	YES	YES		YES	YES	YES	0.75%		
YES	YES	YES		YES	YES	YES	1.22%		
YES	YES	YES		YES	YES	YES	7.55%		
							0.00%		
							10.12%		

5

Sustainability report

Regulation: European green taxonomy

	Revenue	
	Proportion of aligned activities	Proportion of eligible activities
Climate change mitigation	0.59%	0.59%
Adaptation to climate change	0.00%	0.00%
Protection and sustainable use of water and marine resources	0.00%	0.00%
Transition to a circular economy, waste prevention and recycling	9.52%	9.52%
Pollution prevention and control	0.00%	0.00%
Protection of healthy ecosystems	0.00%	0.00%

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”: 2025 investment expenditure amounts to 48.5 million.

Sustainability report

Regulation: European green taxonomy

in € millions

Substantial contribution criteria

Economic activities	Code(s)	Absolute CapEx	Eligible CapEx proportions	Climate change mitigation	Climate change mitigation	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	4.40	9.2%	100%					
Providing data-driven IT/operational solutions	4.1	0.00	0.0%				100%		
Repair, overhaul and remanufacturing	5.1	0.00	0.0%				100%		
Preparation for reuse of end-of-life products and product components	5.3	0.38	0.8%				100%		
Products as services and other circular service models focused on use and results	5.5	0.44	0.9%				100%		
Marketplace for the trade of second-hand goods intended for reuse	5.6	0.00	0.0%				100%		
CapEx of sustainable activities (A.1)		5, 2	10.9%	100%			100%		
A.2 Activities eligible for taxonomy but not sustainable									
Vehicle purchase, financing, leasing, finance leases and operation	6.5	17.06	35.6%						
Acquisition and ownership of buildings	7.7	7.27	15.2%						
CapEx of eligible but non-sustainable activities (A.2)		24.3	50.7%						
Total (A.1 + A.2)		29.5	61.6%						
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY									
CapEx of activities not eligible for taxonomy (B)		18.4	38.4%						
Total (A + B)		48.0	100.0%						

Sustainability report
Regulation: European green taxonomy

DNSH

Climate change mitigation	Adaptation to climate change	Aquatic and marine resources	Circular economy	Pollution	Biodiversity and ecosystem	Minimum guarantees	Proportion of CapEX aligned on taxonomy - 2025	Category (enabling activity)	Category (transient activity)
YES		YES	YES	YES		YES	9.2%		
	YES	YES		YES		YES	0.0%		
	YES	YES		YES		YES	0.0%		
	YES	YES		YES		YES	0.8%		
YES	YES	YES		YES		YES	0.9%		
YES	YES	YES				YES	0.0%		
							10.9%		
NO	NO	NO	NO	NO					
NO	NO	NO	NO	NO					

	CapEX	
	Proportion of aligned activities	Proportion of eligible activities
Climate change mitigation	9.2%	9.2%
Adaptation to climate change	0.0%	15.2%
Protection and sustainable use of water and marine resources	0.0%	0.0%
Transition to a circular economy, waste prevention and recycling	1.7%	1.7%
Pollution prevention and control	0.0%	0.0%
Protection of healthy ecosystems	0.0%	0.0%

c. Operating Expenses (OpEX)

Based on 2025 reporting, maintenance and leasing costs (with respect to non-capitalized 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 2025 financial year is €2,807.9 million, the majority of which was from the purchase costs of sold or leased goods.

in € millions

Economic activities	Code(s)	Absolute OpEx	Eligible OpEX proportions	Substantial contribution criteria					
				Climate change mitigation	Climate change mitigation	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