

FROJAL

LEFEBVRE
SARRUT

STATEMENT ON EXTRA-FINANCIAL
PERFORMANCE

2021 Financial Year

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PRESENTATION OF THE GROUP

FROJAL / LEFEBVRE SARRUT: Your trusted partner in a changing world

Born of the merger in 1999 of two historic players in legal and tax publishing, Editions Francis Lefebvre and Editions Législatives - the FROJAL/Lefebvre Sarrut Group has since experienced regular growth **in France and the rest of Europe** structured around three business lines: **publishing, training and software.**

Our business model



Priorities

- Innovation
- Customer experience
- Employee experience

Capital

- Human: With more than 2,500 employees
- Intellectual: thanks to our employees' skills
- Technological: Through innovation
- Financial: Strong investment capacity

Winning features

- Shareholders
- Expertise
- Contents
- Trademarks
- Customers

Sharing the value created

• €535 million turnover
 With our suppliers:
 33%

With our employees:
 40%

Our challenges – Concordance table

No.	Challenges	Actions/Policies	Indicators
Business challenges			
EC2	Finding the value of tomorrow and being ready to contribute it	<ul style="list-style-type: none"> › Technological and strategic watch › Regular communication between Innovation and the BUs › Prospective Lab 	› CIR research tax credit: number of hours and days*
EI3	Integrating our ethical values into our offers	<ul style="list-style-type: none"> › Application of the measures prescribed by the French Sapin II anti-corruption law › Creation of a Compliance Department › Implementation of CSR projects 	<ul style="list-style-type: none"> › Connection rate to anti-corruption training › Success rate on anti-corruption questionnaires
EC4	Quality of products and services	› Employee training	<ul style="list-style-type: none"> › Amount spent on training* › Percentage of employees trained, by gender
EC5	Compliance with obligations	<ul style="list-style-type: none"> › DPO › Internal control › Awareness raising › Deployment of Data Legal Drive 	<ul style="list-style-type: none"> › Number of requests to exercise rights* › Number of processing activities › Number of data breaches reported to the competent authorities*
EI6	Remaining competitive	<ul style="list-style-type: none"> › Simplifying offers › Regular updates › Quality of the professional network › Meeting our customers' needs › Limiting under-utilisation of our products › Launch of new products 	
EC7	Choosing trusted partners	<ul style="list-style-type: none"> › Purchasing process › Suppliers' Code 	› Monitoring of a selection of partners for compliance with legislation on unreported/illicit employment
EM8	Maintaining hands-on Governance	<ul style="list-style-type: none"> › Family shareholding › Legal structuring 	› Number of Governance body meetings
EC9	Recruiting new talents and earning their loyalty	<ul style="list-style-type: none"> › Mobility process › Monthly reporting › Recruitment validation process › People review 	› Age pyramid*

SOCIAL, SOCIETAL AND ENVIRONMENTAL CHALLENGES			
EI10	Sustaining the social environment	<ul style="list-style-type: none"> › Supporting the teams to help them grow › Local HR, psychological support helpline, workplace health scheme 	<ul style="list-style-type: none"> › Monitoring of labour relations › Work organisation › Absentee rate:
EI11	Uniting around our values	<ul style="list-style-type: none"> › Increased internal communication through unifying internal events and a dynamic Intranet 	<ul style="list-style-type: none"> › Monitoring of internal communication
EC12	Environmental protection	<ul style="list-style-type: none"> › Use of electronic signatures › Discussions on a green offering › Policy of selecting certified suppliers 	<ul style="list-style-type: none"> › Consumption of paper associated with our activities* › Monitoring of the vehicle fleet › Changes in modes of transport › Consumption of paper for administrative purposes › Energy consumption

The above challenges are classified into three categories:

- › Capital (EC): comprises the challenges identified as priority and which are monitored by at least one key performance indicator (KPI);
- › Important (EI): comprises the challenges identified as major, without requiring KPIs or for which indicators are in the process of being constructed;
- › Moderate (EM): comprises significant challenges with a low risk of occurrence.
- › Indicators marked with an asterisk* are KPIs

HIGHLIGHTS OF
THE YEAR 2021

This past year 2021 may not have seen a repeat of the devastating effects of COVID-19 in 2020, but nor, unfortunately, did it bring an end to them. On both the health and the economic fronts we had to continue to face the problems.

In all our subsidiaries we scrupulously applied all the health measures and complied with all the restrictions (lockdown, curfew, etc.) imposed by the various governments in the countries where we operate, with a view to safeguarding the health of our employees and their families.

The effects of the pandemic are still making themselves felt economically, but the hard work of our teams enabled us to regain the path of growth:

- Our Publishing business, which relies on solid brands, was able to maintain a level of growth.
- Our Software Application business continued to grow, thanks in particular to investments in Innovation (see hereunder).
- Lastly our Training business, boosted by the transformation and development of dual-learning offerings, also succeeded in returning to growth after a year 2020 directly affected by the pandemic.

For our customers

The customer experience is foremost among our concerns, and throughout the year we worked to improve and greatly increase interactions, with all our brands, so as to offer our customers a coherent overall experience that creates value for them.

New features:

Lefebvre Dalloz

In France, we launched a new brand bringing together the various areas of expertise of the Group in the service of our customers:

LEFEBVRE DALLOZ.

Lefebvre Dalloz is the result of the major transformation undertaken by the Group for the benefit of its customers and the joining of two brands that are each undisputed leaders in their field. To bring this about, our teams worked on combining the publishers' catalogues and offers of teaching materials so as to propose high added value solutions to the corporate, regulated professions and public sector markets.

As regards training, the Teaching and Digital Learning Division has put in place a teaching charter called SUCCESS, intended to lay down the action principles of the offers of services and to establish the ambition behind it. This charter is based on six pillars designed to further our ambition, which is the effective transfer of skills into professional situations.

LEFEBVRE CENTINELA

In Spain, in March 2021 on the occasion of International Women's Day, our subsidiary LEFEBVRE launched a tool called Centinela Igualdad (Equality Sentinel), a solution that helps businesses draw up an equality plan, which is a legal obligation in Spain.

Within the Centinela range, at the beginning of 2021 Lefebvre also launched a new application called Centinela Concursal (Insolvency Sentinel), which allow debtors, creditors and administrators alike to manage insolvency or pre-insolvency procedures practically and simply.

In Italy, our subsidiary Giuffrè Francis Lefebvre joined forces with Aubay Italia, a leading consultancy on system integration, in order to provide the insurance and finance sectors with advanced solutions for supervising and managing regulatory compliance. This partnership fits perfectly with the Group's digital publishing strategy, which consists in providing professionals, businesses and economic and financial sectors with innovative, reliable and user-friendly solutions.



Giuffrè also launched the application Ordine degli Avvocati di Milano, in association with the Milan Bar. This application brings together news, information on jurisdictional matters of topical interest, a training platform and appropriate contacts, as well as access to the four codes (Civil, Criminal, Civil Procedure and Criminal Procedure). It also provides access to Giuffrè's free content for lawyers.

In Belgium, we have developed Easydrafting Belgium and Easydrafting Luxembourg for our customers. Easydrafting is a new functionality of Strada lex Belgium and Luxembourg which enables users to generate legal documents in a matter of minutes in the areas of company, commercial and labour law, IP and IT.

We also launched Tax-iQ, a tax and duty calculation platform that allows the modeling of advantageous tax solutions.



External growth



In the context of its development in the software business, in March 2021 the Group acquired PREVISOF, a software publisher specialising in the area of occupational risk prevention. By means of this acquisition, our Group aims to strengthen its offering in the HSE market.

Stollfuß

Furthermore, in mid-year our German subsidiary LEFEBVRE SARRUT GmbH, whose activity had been until then to coordinate our shareholding in Juris, a company in which we have long held a stake and which had not until then been part of the scope of the SEFP, acquired Textware Business, the publishing branch of STOLLFUSS, the number three in tax information in Germany. This acquisition has allowed us to strengthen our position in Europe's leading legal market.

Events and awards

Among the actions carried out in 2021, we launched new products and services and undertook acquisitions, but we also organised or took part in various events aimed at showcasing our activities and those of our customers.

The Strategic Committee on Lawyers of Lefebvre Dalloz, created in June 2021, published a white paper entitled "Innovation and Lawyers: time to act!" It proposes seven points for reflection on the legal market in general and the profession of lawyer in particular and seeks to understand the initiatives that could enable the profession to adapt to the profound changes it is going through. This white paper was presented at an event held on 6 October 2021 and was made accessible free of charge from the online bookshop of DALLOZ.



This year once again Francis Lefebvre Formation and Editions Francis Lefebvre (the training and publishing subsidiaries respectively), in partnership with HR service provider Herakles International and recruitment company Hays, won the *Trophée de la Paie* (Payroll Trophy), the prize for which was presented on 14 June 2021. This competition involves completing a complex payroll in a limited time. Nearly 190 payroll professionals took part in this fifth edition, in spite of the health situation.

Another event organised by these two subsidiaries, the Vernimmen Finance conferences, was held on 16 November 2021. Participants were able to attend two round table sessions: "How far will green, responsible and sustainable finance go?" and "SPACs: a passing fad or a tool that's here to stay in the financier's toolbox?"



For the fourth *Procès des Jurisnautes* held on 28 October 2021, Lefebvre Dalloz once again responded to the call by acting as a party in the fictitious lawsuit, the theme of which this year was "How can we save the planet without sacrificing our individual freedoms?" The stage was set by inviting the jurists to think about how the current rules of law would deal with the future.



As a top sponsor of *RDV des Transformations du Droit* (Legal Transformation Rendezvous) - events offering two days to stimulate as well as to unite the ecosystem of innovative actors in the field of law - Lefebvre Dalloz notably mediated two unprecedented conferences during this event, which was held on 18 and 19 November 2021: “Lefebvre Dalloz or Google: which has the law behind it?” and “Trends in 2021 in legal and legal-technological innovation: takeaways.”



The magazine *Direction[s]*, published by Editions Législatives, won the *Coup de Cœur* prize in the 2021 edition of the MediaPro professional press awards for its special edition “*Quel monde d’après?*” (What kind of world afterwards?), which paid tribute to the social action managers and their teams’ efforts in the face of the health crisis, in a case study giving free rein to readers to express themselves and in which nearly 900 managers and executives of establishments and services had taken part to

share both their difficulties and their expectations for the future.

On 8 September 2021, the *Cercle Montesquieu* 2021 award, for the best work on business law or relating to good management practices for legal functions in French business, was granted to Bruylant (the European brand of Larcier-Intersentia) for its work “*L’intelligence artificielle en procès. Plaidoyer pour une réglementation internationale et européenne*”. (Artificial intelligence in process: pleadings for international and European regulation.)



Another important subject for our customers and a driver of our actions in 2021, was the fight against corruption. Because the risks associated with corruption have an impact that is still too often underestimated by businesses, the *Cercle Montesquieu* association of legal managers and *Le Droit Pour Moi*, a legal information website, in partnership with Lefebvre Dalloz, joined hands in raising awareness of operative personnel and general management by launching a series of eight fictitious video episodes on the various aspects of corruption.



Also, and still in collaboration with the *Cercle Montesquieu* and *Le Droit Pour Moi*, on 15 June 2021 Lefebvre Dalloz led a digital conference on the subject of “Anti-corruption: how to involve general management and employees.”



In the Netherlands, in November 2021, our subsidiary SDU presented the Tax Innovator Award to Erik Klop and Pieter Hoogendijk of Visser & Visser for their work based on data at an event called The Integrated Experience organised by several players in the Dutch legal sector.



In Italy, on 22 September 2022, the President of the Italian Republic, Sergio Mattarella received a delegation from Giuffrè Francis Lefebvre in the Quirinal Palace, on the occasion of the new edition of the legal encyclopaedia *I Tematici*. During this encounter the President paid tribute to a work that represents the fundamental values of Giuffrè Francis Lefebvre: tradition and innovation, in the name of high-level content.

All these events organised by our subsidiaries and the awards and recognition obtained are the reflection of our Group's engagement in the evolution of the Law in the service of our customers.

For our employees

Social actions of 2021 were based on two themes.



On the one hand, the dichotomy between distancing and the desire to come together to pursue entrepreneurial projects led to a gradual return to the office sites: we were again obliged to observe social distancing in the context of COVID-19 while at the same time pursuing the objective of coming together and favouring collective endeavour, which has always been a factor in our success.

While teleworking or working from home remained broadly popular throughout the year, we managed to preserve the collective instinct such that all were happy to return to the office at their own pace after the successive lockdowns and periods of remote working and to recover the spirit of teamwork that motivates and drives us forward day by day. To achieve this, we first continued our efforts to get teleworking agreements signed in all our entities. In 2020, six agreements were signed in France and in 2021, three more followed (respectively in France, Spain and the Netherlands). These very favourable agreements allowed each employee to organise his or her work subject to compliance with the health measures put in place by governments and to work in the emerging hybrid mode.



Starting in June 2021, we organised a forecasting game/competition in the context of Euro 2021, with a view to bringing together our European employees around this sporting event.



In Belgium, the employees of Lefebvre Sarrut Belgium started the "Walk Challenge", an original idea for meeting up with colleagues living nearby by going to walk with them for an hour, for the sheer pleasure of meeting up again.

Starting in September, with the gradual lifting of the health measures, we organised *Welcome Week* at all our European sites: in this way our employees were able to meet up at a breakfast organised each day at all the sites, respecting the health rules, to take the time to renew acquaintances and share the pleasure of chatting in person once again.



Getting back together again was also the leitmotif of the Concerto project. The objective of this project, announced by General Management in 2021, is to provide a working tool suited to all employees of the French subsidiaries located in the Paris region in a single site. Employees were invited to take part in co-construction workshops to imagine the offices of tomorrow, suited to hybrid working but also and above all to collective working, to exchanges and to innovation. Collaborative spaces, bubbles for isolation in complete confidentiality and collective work rooms with equipment dedicated to communication all come together in this attractive modern building fitted out by and for the employees of Lefebvre Dalloz.

Another major milestone of 2021, still in the spirit of collaboration, was the bringing together of the teams by business line in order to always provide the best response to market and client needs. For example the teams of our French entities were regrouped as part of this move to subsidiarise the business lines, notably into the Editing and Production, Sales and Marketing and CIO and Data Office functions.

Indeed, the orientations of certain branches were reviewed and reworked to bring them more into line with the market and with our customers' needs. In this, the Data Office takes its place at the heart of our activities to be able to accompany the business lines; the Production teams were also reformed in order to ensure the complementarity of the editorial concepts, which is what sets the business apart in the market, and to share product contents when opportune. The subsidiarisation of the IT business lines will facilitate the sharing of knowledge, the pooling of tools and methodologies and the increase in skills, in order to accompany the Group's various projects and in particular to support the Software Division, created in 2021. The purpose of creating this division is to link customers' daily workflows to the resources of the business, the software solutions being integrated with Publishing, to illuminate the resources through usage tools. Lastly, the Marketing & Sales branch brings together the sales channels and puts the customer journey centre-stage.



The second theme of 2021 was the preservation of the quality of life at work.



To accompany the gradual return to the sites and to prevent the psycho-social risks associated with the health crisis and its consequences for working life, our French subsidiaries are offering an Employee Assistance Programme. This is a dedicated listening service thanks to which employees can share their problems, whether personal or work-related, with specialists.

This service is also available to employees' nearest and dearest in order to promote their wellbeing and that of the people around them and contribute to their work-life balance. Thanks to this programme, employees

can express their fears linked to the changes in the business, report difficulties with management or conflicts between colleagues and also address any much more personal issues they may have.

In Italy, Giuffrè has put in place a Health/Wellbeing and Development Plan for employees in order to accompany employees in their everyday wellbeing but also in their entrepreneurial projects. This plan promotes actions in favour of health and work/life balance for example by providing extra days leave for medical examinations or facilitating “smart working” which caters flexibly to the particular constraints of each person (working from home, disconnection, available times).

As regards innovation

As an essential pillar of our development programme, innovation fires our initiatives and our projects, today and even more so tomorrow, both internally and externally, in particular by intensifying the use of digital technologies. We position ourselves as listeners, to the market and to the new generations, continuing to transform ourselves as key players in the market.

In 2021, numerous approaches were tested and many projects put in place with the objective of being present every month in the news on innovation. We have also produced a documentary series entitled Innovation Stories, aimed at spreading the culture of innovation and encouraging our employees to innovate.



Among the projects launched by the Group this past year was LightSpeed, a European accelerator of legal/technology enterprises offering start-ups selected for the pertinence of their offers a personalised acceleration programme consisting of on-demand mentoring, workshops on specific problems encountered during POC based on user case studies constructed together with our Group experts and inspiring keynote addresses from leading out-

side experts.

Following a pre-selection process in six European countries, the jury announced the six winners, selected from among the 60 start-ups that had applied: Skopos.ai (Netherlands), Brickken (Spain), COP (Italy), Nalantis (Belgium), Droits Quotidiens (France & Belgium) and myCo (France) were chosen to participate in this great support programme, which concluded with an event in Milan.

Another major Group project, launched on 4 May 2021, was Innovaction 2021, our leading entrepreneurship programme, which numbered 70 participants. Twenty of them later had the chance to continue the adventure, working on one of the four projects selected: the CSR accelerator; SEE GROWTH (CSR, a new opportunity for economic growth); Future Students and UP(DATE). They thus formed part of an incubation programme prior to these projects being presented to a jury of in-house experts, who unanimously validated the continuation of the work, the result of which will be announced in the 2022 Statement on Extra-Financial Performance.



As regards the direct business aspects of Innovation, several projects were carried out in 2021, including:



OPPUS x Lefebvre Dalloz in France; an innovative 100% security tool dedicated to labour law professionals which verifies in real time the conformity of an employment contract to legislative and contractual provisions as it is being drafted.



GoComply Whistleblowing in Belgium, a tool for proactively managing the detection of unethical behaviour by monitoring and dealing with the alerts in an organisation or enterprise in compliance with EU legislation.



Lefebvre Sibila in Spain, the first legal documentary analyst to use artificial intelligence;



Cliens Cube in Italy, a documentary and procedural management tool for law firms incorporating editorial content with the stress on e-justice,



Beyond Compliance also in France, the first academy 100% dedicated to compliance, launched on 1 July 2021, constituting a complete, multi-modal set of training modules allowing learners to acquire the basics of business compliance.

Our social, societal and environmental actions

Continuing our actions started in 2020, we pursued our efforts to structure our CSR policy and harmonise its implementation throughout all the European subsidiaries.

In fact each group subsidiary was able to work on this depending on its priorities and convictions, so this gave rise to some fine projects. For example, Lefebvre in Spain took part in the action of the Dadoris and Exit foundations to help young people continue their studies and



enable them to insert themselves in the employment market whatever their situation and context, by donating products for an amount of €9,100 and participating in a coaching programme to accompany them. Still with Lefebvre,

some employees took part in the Reyes Magos (Three Kings) action offering a gift at the Epiphany, the traditional gift-giving time in Spain, to people in difficult economic situations.





The Lefebvre Sarrut Group also committed to combating discrimination against women. For example in Italy, Giuffrè joined the network of Fondazione Libellula, an association promoting gender equality and combating discrimination and violence against women. In France, Editions Dalloz decided to donate all profits from the sale of its first edition of *Les Droits des Femmes face aux Violences* (The Rights of Women exposed to Violence) by Marlène Schiappa, published by Dalloz, to the Fédération Nationale Solidarité Femmes, the association that manages the hot line open to women victims and witnesses of violence.



The Group also provided financial support to numerous associations: for example the €126,219 provided by the training organisations in France to associations such as Good Planet and Médecins du Monde; and the €52,000 paid by the group in the context of sponsorships. Arpejeh, an association for young students with disabilities, and the Vivre l'Autisme ('Living with autism') association were helped by receiving part of the apprenticeship tax of the French subsidiaries. In Belgium, books were donated to associations in Africa, financial donations were made to the Red Cross and computer equipment was donated to associations that recycle this equipment and invest the income in planting trees. Italy also contributed to Group solidarity by making donations to associations as well as to one of the Milan hospitals for an amount of €3,134.



The environment is quite rightly at the heart of our Group's preoccupations, and the actions carried out, particularly in Italy and France, reflect this. "Basta Bottiglie" is the programme launched by Giuffrè to reduce its consumption of plastic: the five Italian sites have gradually seen plastic bottles disappear to be replaced by fountains or recyclable and biodegradable bottles, and each employee received a reusable bottle with the Giuffrè logo.

In France, the continued deployment of new photocopiers allows us to fight waste and thus save paper: the Froidevaux and Montrouge sites are now, like Levallois, equipped with the latest generation network copiers and printers as well as a print management solution with badge authentication for eco-printing in automatically managed modes which will reduce the ecological impact in terms of energy and consumables. The incentive agreements signed in the training organisations in 2021 are in line with this movement, one of the criteria for the triggering of the incentive payment being employees' attendance of a course on day-to-day eco-friendly practices. We thus make use of all types of actions to raise the awareness of all our employees, who are much in favour of these initiatives.

All these actions stem from our values and our determination to participate in a fairer and more sustainable society, but our future objective is now to group these initiatives under a common and better constructed programme to be even more effective. Thus at the end of 2021 the Group CSR Directorate was created, with the appointment of Natacha de Saint Vincent, and work started on harmonisation. CSR ambassadors were identified in each country where we are established, and we worked in concert in workshops, exchanging views on practices and priorities in order to construct our common CSR policies.



During these workshops, we also worked on our values, our DNA, our missions, and our future to define our *raison d'être* and make it a lasting pillar of our strategy.

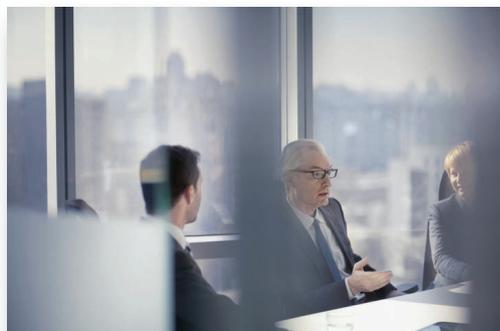
OUR EXTRA-FINANCIAL APPROACH

CONTEXT – ACTIONS & RESULTS IN 2021

Vis-à-vis our stakeholders

Our Shareholders – Our Governance

Context



The very essence of our identity, our strong, united shareholders, mostly descendants of Francis Lefebvre, founder of Editions Francis Lefebvre, and of Jean and Lise Sarrut, founders of Editions Législatives, are involved throughout the year and guide our strategy.

Actions & results

Our governance is structured around committed, competent people, who may or may not come from these families and who work on a daily basis for the growth of the Group. From the composition of our Governance to our legal structure, our intent is to put in place a solid and efficient organisation based both on the legal bodies and on ad hoc committees.

The Governance of the Group is based on two Management Boards and two Supervisory Boards, those of FROJAL and of its subsidiary LEFEBVRE SARRUT, which meet as often as necessary. In taking their decisions, these Boards rely on recommendations by internal Board Committees which study the strategic issues and challenges in depth: the Audit Committee, the Strategic Board, the HR and Remuneration Committee and the Value Committee.

The Executive Committee of LEFEBVRE SARRUT meets once a week on average to monitor our activities closely.

Lastly, every month two meetings are held between the Executive Committee, the subsidiary managers and the Group's operational managers: one devoted to France and the other to the foreign subsidiaries.

In 2021, our Governance bodies met 82 times during the course of the year.

Context

To place our customers at the heart of our development programme so as to be able not only to respond to their expectations but also to anticipate them - such is our ambition. To do so, we must offer them relevant, high-quality and increasingly personalised solutions. Our challenge is also to find the value of tomorrow and to be ready to contribute it to our customers, through innovative products and services that will allow us to face intensified competition.

“
Our mission is to explore new territories by creating or supporting disruptive innovations whether originating from within the group or its ecosystem.
 CAMILLE SZTEJNHORN,
 MANAGER, INNOVATION
 ”

Actions & results



Innovation in the service of our customers is a pillar of our development plan, and we accordingly give it precedence, while at the same time continuing to rely on the strength of our brands and the reliability of our products and services to respond to and anticipate our customers’ expectations. This involves a policy of openness *vis-à-vis* our ecosystem, as well as inculcating a culture of innovation in our employees.

Besides, to confront the competition, and particularly the emergence of innovative and ambitious legal/tech firms, our R&D team works to propose innovative products and services to our customers. In France, we devoted **11,515 hours, or the equivalent of 1,645 days during the year** to the development of projects eligible for the Research Tax Credit.



We are acutely aware of the fact that the quality of our products results from the skills of our employees. For this reason every year we implement a training policy aimed at enabling them to strengthen and increase their knowledge. Thus we spent **more than €1 million** on training during the year and depending on the subsidiaries, **up to 100% of employees were trained.**

Similarly, to consolidate our position as leader and ensure the lasting continuity of our business, we follow our customers’ practices attentively as they turn increasingly to digital methods and solutions in line with the global trend.

Lastly, to measure customer satisfaction in France, in 2021 we put in place a composite indicator compiled from some 40,000 opinions and based on three quality factors: our products, our purchasing and our customer relations. In view of the importance we attach to the role of customer satisfaction in assuring us of the quality of our services and enabling us to face the competition, we are working on the deployment of this indicator throughout the Group's subsidiaries.

Our employees

EC9 – EI10 – EI11

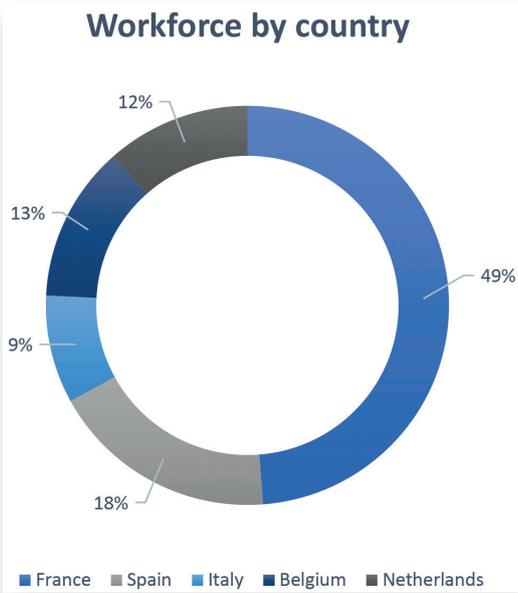
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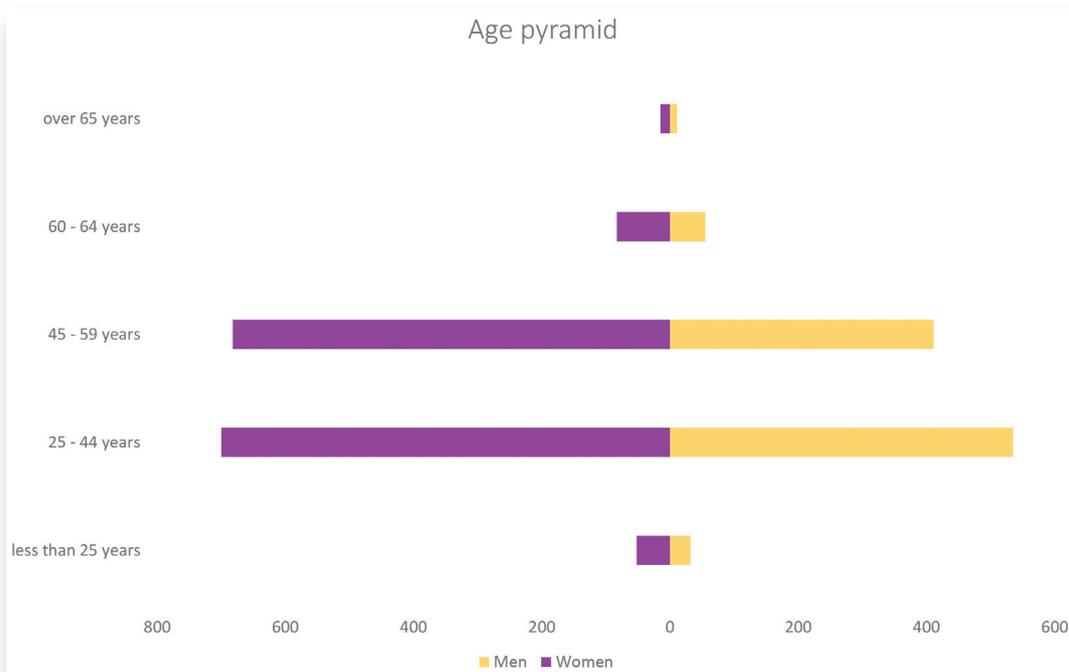
In a global market where the social context can sometimes be fluid and difficult, human issues are at the heart of our concerns. Our aim is to motivate our employees and earn their loyalty.

We have great faith in our values and insist on their being respected in all aspects of our social policy. For example, proximity is to be found in our managerial practices and in the social dialogue that we encourage on a daily basis and that helps create a reassuring atmosphere for all our employees, well-being at work being an important factor in bringing out each person's creativity and full potential. The value attached to skills and the trust we place in our employees (which does not mean that we do not check and monitor the tasks performed) contribute to the excellence of our products and services. Lastly, our shared strategic vision means that everyone can work with a maximum of autonomy, each being responsible for his or her particular assignments and for the shared goal of the Group's growth.

Actions & results

The majority of our Group workforce is female (59%) and nearly half our employees are between 25 and 44 years old (48%). The following diagrams represent the **Group's age pyramid**, the distribution of our workforce by country and the key figures concerning our employees:






41 % of men

29 alternating students

75 chosen part-time

4 mobilities



59 % of women

45 alternating students

403 chosen part-time

16 mobilities

Talent management

Attracting employees and building their loyalty is essential, and involves a large number of actions. Our social policy allows each person to flourish in his or her roles, to be remunerated at fair value, to receive regular training to develop his or her skills and to expand his or her responsibilities and areas of action or to open up new prospects thanks to mobility within the Group. Also, in order to make our business lines better known and to encourage vocations, as it does every year the Group welcomed a large number of young people for training and as part of their professionalisation.



To ensure the development of our talents, we also offer measures enabling employees to plan for our long-term growth in France. A “Mobility Centre” allows employees to obtain all the information and support they need for career management. This platform dedicated to mobility brings together all of the Group's job offers, as well as testimonials from employees who have benefited from mobility. A new version of this platform was launched in 2020, with new functional-

ities and job descriptions allowing everyone to identify the Group's different business lines as well as the skills necessary to facilitate mobility.

This offer is also accompanied by:

- a Mobility Charter which sets out the system within the Group and streamlines the process;
- a guide on international mobility to help our employees who would like to join one of our companies abroad (Europe) and who need to undertake quite a number of individual steps;
- the possibility of Personal Branding sessions with the HR teams to help employees identify and develop their skills.

Our Group also has an evaluation system allowing regular monitoring of appraisals (annual appraisals, professional appraisal, training interview, objective monitoring interview). All these actions enable our employees to play an active role in their career planning and to have a lasting involvement in our projects and in our growth. In Italy, an employee development plan has been put in place: it provides a comprehensive plan for the development of skills, including onboarding, a constructive skills evaluation, a training plan tailored to needs and a survey to assess the effectiveness of the plan.

To accompany the business projects and the changes induced by the health context, the 2021 skills development plan in France was constructed around three main axes: managerial practices, collaborative tools and inculcating the culture of agility.

The social environment

We foster a positive social climate that is allied as closely as possible with our core values. In like manner, the proximity of our Human Resources teams to the Employee Representative Bodies allows us to implement quality agreements and innovative social advances to benefit our employees. In 2021, 155 formal meetings were held with the employee representatives, along with numerous discussions, which led to the signing of 25 agreements on a variety of subjects: incentives, professional equality, work from home, remuneration, etc.

Work/life balance



We have put in place measures to focus on the work/life balance of all our employees. Our various working time and remote working agreements mean that everybody can harmonise the two. We also encourage our employees to respect the right to disconnect, which we formalised in particular in France and Spain. As previously indicated, working from home had in any case greatly increased since 2020 in view of the pandemic. The Group has provided all its French subsidiaries with a harmonised teleworking agreement or a teleworking charter. The

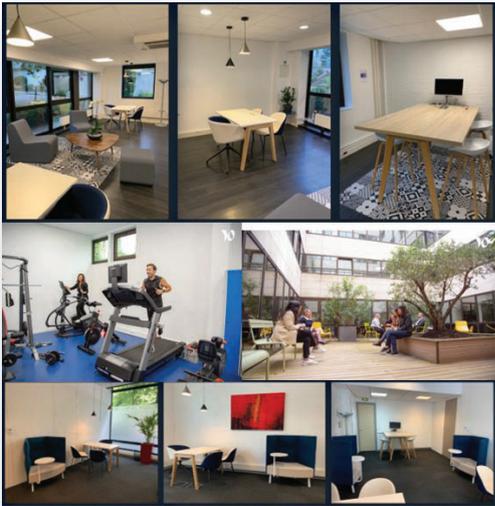
agreements signed in the training organisations in France relating to working hours and their organisation introduced more favourable periods for family and maternity leave than the contractual and legal measures, but also the possibility of benefiting from a system of extra free days off for employees' specific life events.

Workplace health

In France, we offer all our employees a health and pension insurance contract so that they benefit from cover on favourable terms and can plan for the future with total peace of mind. In all the French subsidiaries, we have set up a hotline dedicated to employees and their loved ones, through which they can discuss any problems they encounter, whether professional or personal. These measures are essential for quality of life in the workplace and much appreciated by our employees, making them all the more willing to give their best. In the context of the large-scale implementation of remote working, we also provided a guide to all employees containing the rules to be followed when working from home, including the essential rules of well-being and safety.

Absenteeism fell in 2021: at 11,773 the number of days absence due to sickness was down by 33%; the effects of the pandemic made themselves felt strongly in 2020, but somewhat less so in 2021.

Working environment



Major renovations have been carried out in recent years in most subsidiaries with the aim of modernising the workspace by incorporating new technologies: co-working, home office, open space, working café, sports room, siesta room, relaxation space, etc.. These allow everyone to work in a pleasant environment that promotes comfort, dialogue and well-being at work. New technologies have a major place within these new spaces. Specifically, voice-over-IP, video-conferencing, audio-conferencing and projection screens have been increased to bring the functionality of powerful tools to employees.



Furthermore, since 2020, in parallel with the signing of the various teleworking agreements, we have been offering our employees an external co-working solution: this solution allows them to benefit from the advantages of working together and office equipment while at the same time limiting the time and the stress of transport since our partner has co-working spaces throughout France. To accompany this “nomadic” practice, we

have developed an in-house solution. A virtual assistant called Waldo gives employees information on each other’s planning to facilitate exchanges among all employees regardless of where they are working at any particular time.

Lastly, as indicated under Highlights of the Year 2021, the French teams will have the pleasure of coming together at a common site from 2023 on. Located at La Défense, the Akora building was chosen for its situation but also for the numerous possibilities it offers. Entirely renovated for the needs of the French teams, this modern, nine-story building is easily accessible and is in a pleasant setting with plenty of greenery. This superb investment will allow us above all to work in optimum conditions, favouring technology and innovation and in perfect consonance with our values: proximity, excellence and sharing.

Redistribution of wealth

The contribution of each employee to the Group’s results is also recognised by financial benefits. Participation and incentive agreements and Company Savings Plans offered within subsidiaries are a perfect illustration of this. Furthermore, remuneration levels applied within the Group recognise the contribution of each individual at their fair value and are revised in line with their true worth.

Diversity

We consider diversity as a real source of value, and we incorporate it into all our processes: our recruitment, training, promotion and remuneration practices are all devoid of any form of discrimination.



In collaboration with the employee representative bodies, we have appointed and trained people to act as points of contact and reference to combat discrimination and sexist behaviour. As part of this approach we have also developed an in-house training programme which will be delivered from 2022 to the managers of the French subsidiaries to combat discrimination in managerial practices.

All our subsidiaries are engaged in this theme: in Spain an anti-harassment and anti-discrimination plan was implemented in 2021, and in the Netherlands a diversity policy is being constructed on the basis of a survey conducted in-house which will lead to an action plan in 2022.



We regularly conduct awareness-raising sessions with our employees on the insertion of persons with disabilities. In 2021, we welcomed three persons with disabilities into our French subsidiaries in the context of Duo Days. We also organised an exchange with Josef Schovanec, French philosopher and writer, in the context of a conference on autism in business.

We also established a partnership with Arpejeh in order to welcome persons with disabilities in the context of their training.

Lastly, the carer's guide that we have been offering for some years to those of our employees that look after a sick or disabled relative provides them with information, advice and useful links to help them.



Our suppliers

EC7

Context

Because the consequences of contracting or of a partnership are important for all businesses, we are just as demanding with our suppliers and partners as we are with ourselves.

Actions & results



For some years now we have had in place purchasing policies aimed at responding to the stakes involved in compliance. These policies are currently in force in practically all our subsidiaries, and through them we endeavour to ensure that the companies with which we contract have Corporate Social Responsibility requirements that are as exacting as our own.

This past year, for the first time in France, we are proud to have placed CSR at the centre of two of our main calls for tender by making it a determining criterion.

In 2021 we also put in place a suppliers' code of conduct which aims to establish the minimum standards of behaviour expected of all suppliers to our Group in all circumstances. This code deals in particular with ethical problems but also requires our suppliers to make firm commitments on social and environmental issues.

In 2021, we put in place, in France, a tool for monitoring and guiding compliance by our biggest co-contractors, in order to combat undeclared or irregular employment by obliging them to communicate the following elements via the platform: proof of registration, 'attestation of vigilance' (certificate of insurance) dated less than six months ago and list of names of foreign workers subject to work permits. We have invited 953 suppliers and service providers to register on the platform. Of the 953, 425 responded favourably to this invitation and **74%** sent all the documents requested.

Summary of indicators

Indicators	2020	2021	Trends
Number of Governance body meetings	76	82	↗
Percentage of men trained (depending on entity)	From 6% to 81%	From 8% to 100%	↗
Percentage of women trained (depending on entity)	From 14% to 81%	From 20% to 100%	↗
Amount allocated to training	€900K	€1 million	↗
Number of hours devoted to projects eligible for the Research Tax Credit	9,401	11,515	↗
Transfers - Women	13	16	↗
Transfers - Men	7	4	↘
Number of meetings with employee representative bodies	176	155	↘
Number of agreements signed	17	25	↗
Number of employees choosing to work part time	344	478	↗
Number of days of absence	17,617	11,773	↘
Number of articles published on the intranet	N/A	221	New
Percentage of complete supplier files on the fight against undeclared employment	N/A	74%	New

Context



The nature of our business means that our Group is particularly sensitive to issues related to the use of paper and, in the face of environmental risks, it is the duty of everyone to assess the consequences of uncontrolled consumption.

However, the production of certain books or news content still requires the use of paper, although such consumption is extensively monitored as part of our quest to minimise its use.

Indeed, we are convinced that the proper management of our CO₂ emissions, the treatment of waste and the prudent use of resources are essential aspects for the health and balance of our planet but also for our customers, for our employees and for future generations.

Actions & results

In our activities

To reduce our carbon footprint, we offer services on digital platforms as well as downloadable books and journals. Similarly, as regards professional training, we favour catalogues in digital format and website access and teaching materials are printed on two sides and reworked to reduce them to the essential or offered in dematerialised form. We have also developed the dual-learning offering to limit the ecological impact of our activities.

However, the production of certain books or news content still requires the use of paper, although such consumption is extensively monitored as part of our quest to minimise its use. Also, for several years now, our SEFP has presented data relating to our consumption of FSC and PEFC⁽¹⁾ paper, by type of products and their share in our total paper consumption.

Today the printing of our periodicals, books and marketing documents represents 3,760 metric tons of paper, of which 78% is printed on FSC or PEFC paper compared with 70% in 2020 and 51% in 2019.

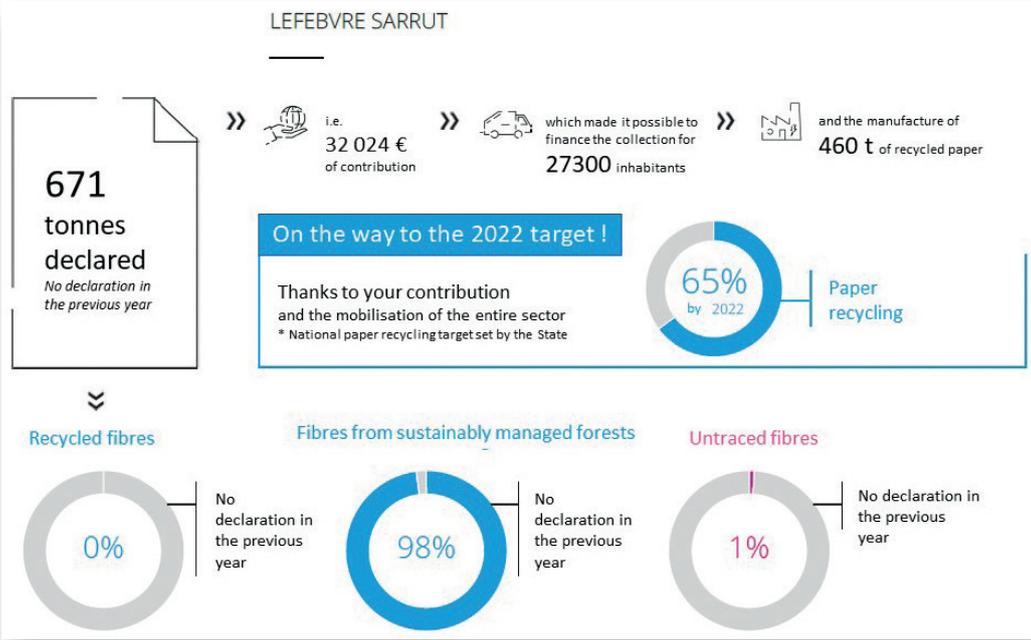
1. PEFC Chain of Custody certification is issued to companies by an independent certification body. This process tracks forest products from their place of origin through all stages of transfer and production to the final consumer as a PEFC-certified end product. At each stage, the certified wood must be clearly identifiable in stocks and on companies' documentation. The chain of custody concerns all stages of production – through harvesting, transporting, handling or processing and commercialisation of wood and wood-based products (such as paper). Purchases and sales are therefore monitored and tracked to ensure maximum reliability for final consumers.

We also favour certified printers. Thus, of 30 providers:



- 1 holds 6 certifications,
- 3 hold 5 certifications,
- 6 hold 4 certifications,
- 4 hold 3 certifications,
- 10 hold 2 certifications,
- 3 hold 1 certification,
- and only three have no certification.

Furthermore, in France, our Group is a member of Citéo, a State-approved eco-organisation, enabling it to meet its obligation of "**Extended Producer Responsibility**" and thus participating in the circular economy of the Paper industry.



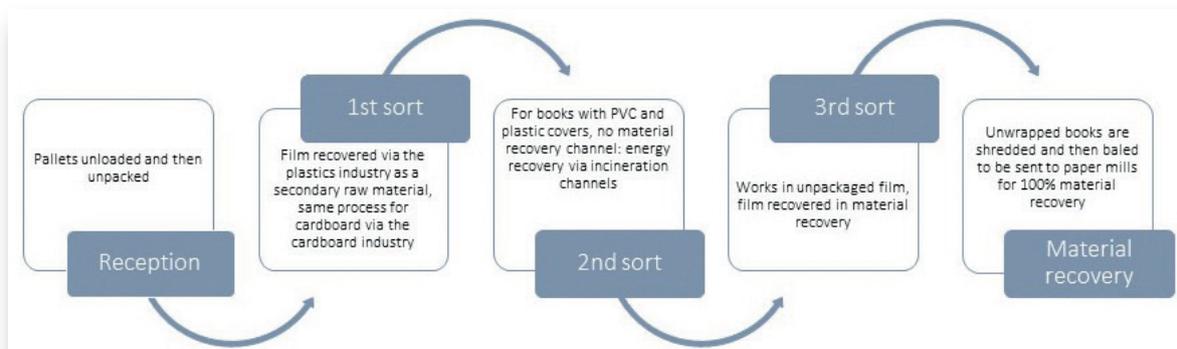
Valuing our contribution



- » By joining Citéo, a company dedicated to helping companies reduce their environmental impact, **LEFEBVRE SARRUT** meets its "Extended Producer Responsibility" obligation and delegates to Citéo the management of the end-of-life of its papers placed on the market in France. In this way, it participates in the circular economy of the Paper Sector.
- » With a contribution of €32,024 for the 2021 launches, **LEFEBVRE SARRUT** financed the collection of paper from 27,300 inhabitants, resulting in the recycling of 460 tonnes of paper. As a player in the circular economy, **LEFEBVRE SARRUT** used 98.64% of paper from sustainably managed forests.
- » For the Paper Sector, the impact of this contribution is multiple:
 - It increases recycling, as it provides financial support to local authorities to develop their collection and sorting schemes towards greater performance;
 - It encourages eco-design, as it provides a financial incentive for producers: the more eco-designed the product, the lower the eco-tax;
 - It develops innovation because it finances R&D activities conducted by Citéo and its partners;
 - It finances communication media aimed at raising awareness of the sorting process among all citizens.

In order to reduce the environmental impact and the cost of unsold product, we also make use of print on demand, and we have launched a programme to reduce the use of plastic in our works.

Still as part of an environmentally responsible approach, our end-of-life product (pulp) is made available to PAPREC and GDE who are in charge of processing in accordance with the following diagram:



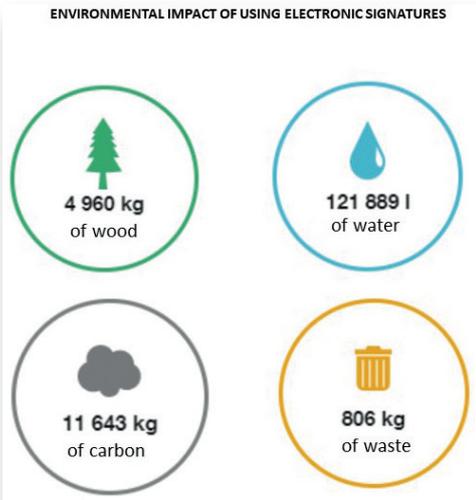
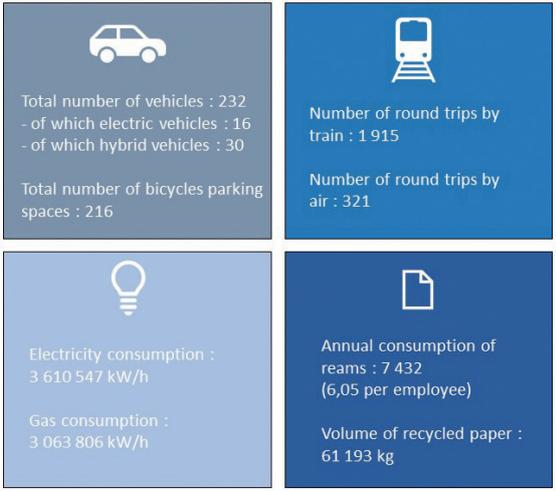
In 2021, we also continued to work on the construction of an environmental programme for the paper/works branch, trying to rethink our production from a circular economy point of view combining green ordering and/or subscription, and we hope to see this project evolve favourably over the course of 2022. This project is still only at the feasibility study stage, but regardless of the outcome we aim to optimise the life cycle of our works, and this may lead to other possible projects, to be defined.

In our day-to-day

As a committed Group, it is up to us to work on implementing robust, concrete actions so that the development of our activities does not come at the expense of our environment.

We present hereunder our monitoring indicators on the management of our vehicle fleet, on the consumption of paper for administrative purposes, on changes in our modes of transport and in our energy consumption.

For some years now we have also been using electronic signatures via the DocuSign solution, which allows us to limit the environmental impact of our administrative activity:



Ethics

EI3 – EC5

Context

As a benchmark player in the field of law and finance, we owe it to our customers and employees to be exemplary. Respect for laws and regulations is therefore a sine qua non for carrying on our activities.

Actions & results

In developing our tools and products we respect the security of personal data. We make sure that each of our entities complies scrupulously with the General Data Protection Regulation (GDPR). A Data Protection Officer (DPO) has been appointed in each country where we operate. The continued deployment of our programme allowed us to put indicators in place in all our subsidiaries and we are thus in a position to record 173 activities in which processing of personal data took place and was under control. We also handled **2,368 requests to exercise rights** in the year and notified **five data breaches** to the competent authorities in Europe.



Our vigilance intensified thanks to the efforts of our CISO, appointed in 2021, and the programme of awareness raising deployed in the French subsidiaries where five campaigns were launched with employees. This same awareness-raising programme will be extended to the Netherlands in 2022. In Spain and in Italy, awareness-raising measures have also been put in place.

Since 2017 we have also taken account of the eight measures contained in the anti-corruption law known as “Sapin II”. Thus we have put in place a Charter of Ethics applicable to all Group subsidiaries, accounting and financial procedures have been put in place in order to prevent and resolve any problems that might arise, and we raise our employees’ awareness of the various measures of the anti-corruption law. Depending on the subsidiaries, the connection rate for this awareness-raising varies between 36% and 68%. The success rate is between 73% and 93%.

Although an alert procedure is currently in place in the Group, we envisage implementing a follow-up tool in 2022, as has already been done in Spain.

We are just as demanding of our suppliers as we are of ourselves. It is for this reason that we have applied a determined purchasing policy for some years now that takes account of social and environmental issues. Through this policy, we ensure that the companies with which we contract have Corporate Social Responsibility requirements that are just as exacting as our own. Moreover, we reinforced this policy in 2019 with the implementation of a responsible purchasing procedure and a monitoring tool for our French suppliers, who must meet a certain number of criteria in order to be able to contract with the Group.

Summary of indicators

Indicators	2020	2021	Trends
Percentage of paper that is PEFC or FSC	70%	78%	↗
Number of motor vehicles	229	232	→
- of which electric vehicles	8	16	↗
- of which hybrid vehicles	26	30	↗
Number of bicycle parking spaces	212	216	↗
Number of return trips by train	1,625	1,915	↗
Number of return trips by air	350	321	↘
Consumption of reams of paper for administrative purposes	8,725	7,432	↘
Average number of reams per employee	4	6	↗
Volume of paper recycled	15,211	61,193	↗
Electricity consumption in kWh	3,697,578	3,610,547	↘
Gas consumption in kWh	2,886,763	3,063,806	↗
Connection rate to anti-corruption training	N/A	From 29% to 68%	New
Success rate on anti-corruption questionnaires	N/A	From 73% to 93%	New
Number of requests to exercise rights	994(*)	2,368	Not comparable
Number of processing activities	N/A	173	New
Number of data breaches reported	N/A	5	New

(*) changes in consolidation scope: in 2020, this indicator concerned only France, whereas in 2021 it concerned all subsidiaries.

OUR OBJECTIVES FOR 2022

2022 will be another year rich in projects contributing as in the previous two years to the structuring of the Group in the context of the transformation of its business model.

Employee experience



To accompany the subsidiarisation of the business lines, we envisage a coherent skills development plan, the common threads of which will be hybrid management, change management and psycho-social risks, and teleworking. For the IT branch, the main focus will be on the fundamentals of project management. For Publishing, it will be on transversal management, acculturation, writing for multimedia and project leadership. For Sales, training will cover key accounts, the marketing and sale of software applications, sales tactics and

customer loyalty.

Training will be delivered in-house on the fight against discrimination and sexist behaviour as part of our commitment in favour of diversity.

Lastly, after the various movements linked to the transformation embarked upon by our group, and with a view to unifying practices and policies, we intend to concentrate our efforts on the employee experience by providing them with all the resources they need in order to prosper in their careers.

Innovation

In 2022 we will innovate even more, with the objectives of:

- increasing the number of innovative in-house projects,
- increasing the number of applicants to the Innovaction programme,
- launching new projects, to be measured by the number of new POCs launched in 2022.

Customer experience

We aim to work throughout the year on developing our products by incorporating the CSR dimension, an initiative that may take several forms: a range of products that are eco-responsible in terms of their production, transport, means of distribution and life cycle; or the development of solutions to support our customers in implementing their own CSR approaches.



Compliance

Compliance is one of the priority bases of our transformation, and we are therefore going to continue our efforts to raise awareness of the fight against corruption in all our European subsidiaries. To strengthen our policy, we are going to work on the other measures contained in the Sapin II law, in particular the strengthening of our alert procedure, with the possible deployment of a common alert monitoring tool for all our subsidiaries.

The GDPR programme will also continue, starting with the annual update of the processing registers and their incorporation into our Data Legal Drive. This update also provides the opportunity to review the organisation of our programme as regards the various changes that have taken place in the branches, so that the mapping of our processing more and more closely reflects our organisation and activities and is therefore better controlled and managed.

A new awareness-raising programme on the GDPR will also be conducted in the second half of the year.

Lastly, the conflict between Russia and Ukraine in early 2022 has heightened the threat of cyberattack and made it more necessary than ever for us to protect all our resources by continuing to spread awareness of the need for cybersecurity. In 2022 the information campaigns already delivered to the French employees will also be carried out with our employees in the Netherlands.

CSR policy



The appointment in 2021 of a CSR Manager and the work done on defining the Group's mission statement have given rise to numerous projects which will be developed and in some cases even completed during 2022.

Two main objectives can be distinguished for the new year:

continuing to structure our extra-financial commitments with the support of a consultancy able to offer us an effective methodology and a sharing of experience in line with our expectations;

breaking down the mission statement and reflecting it in the policies of all our subsidiaries. Indeed, the mission statement, based on our history, our DNA, our know-how, our added value and our ambitions for the future, must now be confirmed or reflected in all the actions that we undertake *vis-à-vis* all our stakeholders. In this context, we will first communicate our mission statement in order to make sure that everyone recognises our distinguishing features, we will make sure our commitments are reflected in all our actions and policies, financial or otherwise, on a European scale, and we will develop the pertinent performance indicators to measure this reflection and the effectiveness of our actions. This first stage will be far-reaching since it requires us to further improve our structure, involve all stakeholders, control the proper execution of the project and equip ourselves with effective tools, and all this covering our subsidiaries in eight different countries. To consolidate compliance of all actions, we also intend to put in place a representative steering committee whose mission will be to ensure that the Group strategy remains faithful to the commitments made in its statement of mission statement.

Apart from this, a certain number of projects have been identified and will be worked on throughout the year 2022. Feasibility studies will be carried out for certain projects that we see as opportunities faithful to our commitments and values and to which we are therefore keen to apply our efforts, but the chances of success of which we are unable to assess. Among these projects that have been identified are:

a “non-profit” policy for developing or continuing our philanthropic initiatives, studying the possibility of bringing them together under the aegis of a European-wide business foundation;

Following the publication of our statement of mission statement, we wish to consolidate all our policies in order to obtain one or more labels representative of their quality;

In 2022 particular emphasis will be given to our environmental responsibility in terms of technological processes. In this regard, IT plays a full part in the Group’s actions as regards social, legal, transformation and innovation aspects. Specific actions have been identified, particularly as regards the IT hosting strategy, optimisation of volumes of data, integration of eco-design in the development of IT solutions and services, the hardware and IT services procurement policy and the consumption of IT assets.

The year 2022 is another year full of projects and promising advances for our Group: by following our development plan and structuring our organisations, we strive to respond to the challenges of the future, taking care to respect our fundamental principles while at the same time being attentive to developments in our ecosystems.

APPENDIX 1 – NOTE ON METHODOLOGY

The monitoring of social and environmental information allows us to:

- Make sure that the values embraced by the Group are adhered to;
- Identify, steer and manage our risks and challenges,
- and define policies and action plans allowing us to better manage the aforementioned risks and challenges.

Duration of the Financial Year

All the indicators are calculated for the period from 1 January to 31 December 2021.

Scope of consolidation

The scope of consolidation extends to all the Group's trading companies, with the exception of:

- juris, an associate over which we do not exercise exclusive or joint control,
- companies and activities integrated during the year for which we do not have exhaustive data except for the distribution of the workforce,
- companies with five employees or fewer on the social indicators when they allow the employees concerned to be identified, except for the distribution of the workforce.

The scope of consolidation therefore comprises 17 companies located in seven countries, and included in the scope of the Group's financial consolidation at 31 December 2021.

Apart from this, certain indicators have a defined scope (e.g. France only, Publishing only, Training only, etc.). In this case, a specific mention is inserted at the beginning of the definition to facilitate readers' understanding of the data.

Data collection method

Data for the purposes set out above was collected from:

- For social data: HR - Payroll services for each company in France and abroad. A collector within the Group Human Resources Division was appointed for these purposes.
- For environmental and business data France: from the Working Environment and Purchasing Division (WEP) and the Manufacturing Division. The Directors of these Divisions chose to be collectors for their data.
- For environmental and business data outside France: no equivalent of the WEP exists in other countries, so the CFOs of each foreign subsidiary collected the data. The data was then consolidated by the French collectors.

- For innovation: the data are communicated by the Innovation Division on the basis of the report drawn up by the FI GROUP.
- The data associated with the exercise of rights and data breaches were collected by the Compliance Unit of the Legal Division in liaison with all the DPOs.
- The data on anti-corruption awareness-raising campaigns come from the Sensiwave tool.
- For data monitoring internal communication, the data are collected by the Communication Division.
- For the monitoring of Governance bodies, the number of meetings is tracked by the Assistant to General Management and Group Legal Division.

Indicators used

The selected indicators were communicated to contributors when launching collection campaigns together with a lexicon for better readability for each indicator.

These indicators are mostly provided for the entire scope of activities. However, for some indicators that are difficult to transpose to all European countries, an analysis of France's activities has been provided. Where the scope of the indicator differs, a note appears to make this clear.

Definition of the indicators presented in the concordance table

N.B.: The indicators followed by an asterisk () are our key performance indicators (KPIs), which are shown in bold*

EC1 – Making a success of our transformation

This capital challenge for which we had put policies in place was not supposed to be permanent: indeed, the transformation started two years ago cannot last longer since the associated programmes have been put in place, followed up and have led to the merger of the training organisations in France, the internal reorganisation in France and the evolution of our digital offering.

The indicators (particularly the KPIs) relating to this challenge have therefore been eliminated.

EC2 – Innovation / Finding the value of tomorrow and being ready to contribute it

CIR*

The CIR (*crédit d'impôt recherche*) research tax credit is a generic measure in support of businesses' R&D activities, without restriction as to sector or size. For the monitoring of our actions in France, our Group uses an external consultancy firm to assess the time spent by our employees on eligible projects.

Thus the indicator presented corresponds to the number of hours – translated into days on the basis of a 35-hour week – spent by Group employees on the development of projects eligible for the CIR.

Given that the objectives are moving targets making it impossible to produce an indicator in numbers, the monitoring indicator for the objectives of the Innovation Division has been eliminated.

EI3 – Integrating our ethical values into our offers

For this challenge, the monitoring indicator initially constructed was the monitoring of the various CSR projects: Sapin II, the anti-corruption law and the GDPR. This indicator, not quantified in figures was not representative of the actions put in place, and as indicated in last year's report, starting in 2021 we have put in place indicators, starting with the Sapin II law, which reflect the taking into account of our ethical values.

These two indicators are the following:

Connection rate to the training on the fight against corruption

This is the percentage of employees connecting, irrespective of whether or not they completed the course or validated it.

Success rate on anti-corruption questionnaires

The success rate is the number of employees validating the course, which means obtaining a score of at least 75% correct answers, expressed as a percentage of the total number of employees completing the training course.

These indicators will be twice-yearly.

EC4 – Quality of products and services

Amount spent on training*

This concerns the actual disbursements relating to training.

Percentage of employees trained, by gender*

This indicator tracks the percentage of employees trained, broken down by gender: it is calculated by dividing the number of people trained by gender by the total number of employees at 31 December by gender.

Where the same employee undertakes training more than once per year, he or she is only counted once.

A training course lasting two years is counted for the first year only. We note that certain training courses initially scheduled for 2021 were counted in 2021 but did not actually take place until 2022 due to postponements by the training organisation. These courses will not therefore be counted in 2022.

This indicator includes some hours of e-learning delivered in the context of an in-house training programme for our sales forces (Sales Academy). These hours of training cannot currently be formally attested to.

EC5 – Compliance with our obligations

Monitoring of requests to exercise rights *

This concerns the number of requests made to the DPO to exercise rights linked to a commercial solicitation.

As was hoped, this indicator is now calculated for all subsidiaries.

Number of processing activities

This indicator reflects the activities described in the Group's processing registers, allowing the degree of exhaustiveness of the activities processing personal data to be assessed and mapped.

Follow-up of data breaches reported to the competent authorities*

This concerns the number of data breaches reported during the year to the competent authorities.

EI6 – Facing the competition

The indicators are currently in the process of being constructed, and should be ready to present starting next year.

EC7 – Choosing trusted partners

Thanks to the installation of the e-Attestations tool in France in 2021, we can now monitor compliance with the law on undeclared employment by a selection of partners* with which we work on a regular basis. This indicator is calculated directly by the tool.

This indicator is not as yet calculated for the whole Group in view of the different legislations.

EM8 – Maintaining the involvement of our governing bodies

Monitoring of Governance body meetings

This indicator, applicable to the decision-making bodies of FROJAL and LEFEBVRE SARRUT, covers:

- The number of meetings of the Supervisory Boards,
- The number of meetings of the Strategic Board,
- The number of meetings of the Audit Committee,
- The number of meetings of the HR and Remuneration Committee,
- The number of meetings of the Executive Committee,
- The number of meetings of the Leadership Team France,
- The number of meetings of the Leadership Team Europe.

EC9 – Recruiting new talented people and earning their loyalty

Age pyramid *

This indicator shows the workforce at 31 December of the year audited on permanent or temporary contracts (excluding replacement temporary contracts) and work-experience type contracts (apprenticeships and professionalisation) as “headcount”. Trainees, interns and service providers are not counted. Employees included in the workforce must have an employment contract with one of the Group's companies.

The breakdown of the workforce by gender and age brackets is as follows:

- Under 25
- Between 25 and 44
- Between 45 and 59
- Between 60 and 64
- Over 65

Age is determined at 31 December of the previous year.

Compiling these data, usually provided distinguishing first by gender and then by age group, allows us to construct a global age pyramid* for all Group employees.

Turnover rate

The rate of turnover usually followed will no longer be indicated since for two years now the COVID-19 pandemic and the new organisation of the Group in the context of the transformation programmes have affected the workforce in a way that is unusual and not representative of our social policies. We consider that it is therefore no longer relevant to follow this indicator in view of the current situation.

Mobility (transfer)

This is mobility between subsidiaries, whether French or foreign.

Mobility within the same subsidiary, but in a different Division/Department/Unit/Service is not counted.

A transfer is counted for the subsidiary of origin but not for the receiving subsidiary.

New arrivals *

We have eliminated the monitoring of entries by subsidiary, in view of the legal particularities of the countries in which our subsidiaries are established, which lead to difficulties in matching the definition with the monitoring of the actual entries. We do not wish to publish approximate figures and therefore prefer to eliminate this indicator.

Levels of remuneration *

We have dispensed with the ranges of remuneration usually followed since they do not reflect our practices. Indeed, we encountered a number of difficulties in trying to consolidate and compare these data due to:

- the remuneration policies of each particular subsidiary; our efforts are concentrated on harmonisation, which requires historical particularities to be taken into account and makes comparison impossible,
- the distinction by status: the status of “executive” exists only in France, and cannot readily be compared with the status of “Manager” in the foreign subsidiaries.

Nevertheless, we continue to work on our remuneration policy and to offer our employees fringe benefits as well as basic remuneration which is already well in advance of that required by law and contract/agreement.

Promotions

This indicator is no longer followed since it is not representative of the various changes that can take place in the Group.

EI10 – Sustaining the social environment

Monitoring of labour relations

This indicator presents the nature of the Employee Representative Bodies in the company (Works Council, Personnel Representative, Health and Safety and Workplace Conditions Committee, Combined Works Council and Employee Representative, Social and Economic Committee), the number of union representatives, the number of meetings during the year (excluding negotiations), the number of agreements signed during the year as well as the subject matter of these agreements. These indicators are representative of the situation at 31 December 2021.

Gender equality index

The calculation of a gender parity index is a French obligation that we wish to apply to all Group subsidiaries. After several attempts, we have not hit upon a method applicable to all subsidiaries because of the national particularities or sufficiently representative of the comparative situation of men and women.

Nonetheless, this subject remains a priority for the Group, which has also embarked upon other actions.

Monitoring of the organisation of work

This indicator shows the number of full-time and part-time employees, by status and gender, at 31 December. The staff numbers used are the same as for breakdowns by gender and by age, excluding work-experience type contracts.

Monitoring of absenteeism

This indicator shows the number of working days lost due to absence as a result of sickness, by gender and irrespective of the type of contract. Days of absence due to sickness do not include maternity leave, long-term illness (more than 90 days) or any sickness for which no certificate was issued.

The absence of an employee whose working time is less than 7 hours per day on average (depending on the working time agreement) is equal to 1 day since it corresponds to 1 day not worked on the part-time basis applied.

For any therapeutic part-time sickness leave, the number of days of absence due to sickness is indicated separately.

E11 – Uniting around our values

Monitoring of internal communication

This indicator corresponds to the number of articles published on the Group intranet (in French and in English).

The indicator of the number of webinars held last year has been eliminated since it was not possible to replicate it at Group level, which made it virtually irrelevant.

EC12 – Preservation of the environment

Monitoring of paper consumption associated with the manufacture of our works and/or our marketing actions *

This indicator includes, based on a breakdown by product category (periodical publications, books and marketing documents):

- The monitoring of the annual paper tonnage by company consumed for printing paper products,
- And the monitoring of paper tonnage from sustainably managed forests consumed in the printing of paper products (FSC or PEFC).

The data collected relates to the manufactured products delivered and invoiced in year N. In the case of a partial delivery in year N and the balance in year N+1, paper consumption will also be accounted for partially for year N, and the balance recognised in year N+1 (2 invoices and 2 consumptions). The consumptions include both the consumed paper bought by the company and that provided by the printers.

This indicator is presented in the form of a percentage.

Monitoring of the vehicle fleet

This indicator, calculated on 31 December of the audited year, covers:

- The number of vehicles, meaning the number of vehicles belonging to the company or on long-term lease,
- The number of electric vehicles, meaning the number of electric vehicles belonging to the company or on long-term lease,

- The number of hybrid vehicles, meaning the number of hybrid vehicles belonging to the company or on long-term lease,
- The number of parking spaces reserved for bicycles.

Monitoring of changes in modes of transport

This indicator, calculated on 31 December of the audited year, covers:

- The number of return trips by rail but does not take into account single journeys or combinations of different modes of transport,
- The number of return trips by air but does not take into account single journeys or combinations of different modes of transport.

Monitoring of paper consumption for administrative purposes

This indicator, calculated on 31 December of the audited year, covers:

- Annual consumption of reams of reprographic paper, corresponding to the number of reams of paper, of all sizes, billed during the year audited,
- The grammage of the reprographic paper mainly used in each Group entity in g/m²,
- Average annual consumption of reams per employee: paper purchases of all invoiced formats divided by the number of employees in full-time equivalent on 31 December of the audited year,
- Annual volume of recycled paper, being the number of kilograms of paper collected by the service provider in charge of recycling,

The indicators “Measures to limit the consumption of paper” and “recycling other than of paper” have been eliminated since they cannot be monitored.

In France, thanks to the DocuSign tool, we also measure the environmental impact of the use of electronic signatures. This indicator is calculated directly in the tool for a sliding twelve-month period. The reference period extends from 1 March 2021 to 2 February 2022.

We are working to develop this indicator for the entire Group with effect from next year.

Monitoring of energy consumption

This indicator covers:

- Annual electricity consumption, being the electricity consumption in kW/h during the year and normally established on 31 December of the audited year.

If it is not possible to communicate the data at 31 December of the audited year, the data are calculated over a rolling period (e.g. November N-1 to November N);

• Annual gas consumption: corresponds to the gas consumption in kW/h during the year and normally established on 31 December of the audited year.

If it is not possible to communicate the data at 31 December of the audited year, the data are calculated over a rolling period (e.g. November N-1 to November N).

N.B.: For sites closed during the year, the data run from 1 January of year N to the end of the lease.

APPENDIX 2 – OVERVIEW OF OUR SUBSIDIARIES

Legal, tax and regulatory publishing

The subsidiaries of the Publishing Division are as follows:



Editions Francis Lefebvre: tax, legal and accounting publisher for companies and lawyers. The creator of Memento, a practical and essential tool for legal and accounting professionals, publisher of the Navis and Inneo portals and software solutions for accountants, notaries, lawyers and companies.



Editions Législatives: publisher of the ELnet portals, creator of the Dictionnaires Permanents for companies and particularly HR professionals, accountants, real estate professionals, social action and HSE, administrations and more generally all legal professions.



Editions Dalloz: publisher of a very wide range of books, codes, reviews, encyclopaedias, portals and digital solutions for lawyers and other legal professions, students and academics, and governments. Its Juris Edition department is a reference for non-profit organisations.



Sdu : the second largest legal publisher in the Netherlands, with a wide range of digital and paper offerings (databases and online services, tools and software, mobile applications, magazines and books) for lawyers, companies, tax specialists, and public actors, including the central government and local authorities. Sdu also runs events and seminars.



Lefebvre: foremost legal publisher in Spain, resulting from the merger between the subsidiary created in Spain in 1989 by Editions Francis Lefebvre and El Derecho Quantor, acquired in 2010. Lefebvre offers a wide range of paper-based and digital documentation, including in the mobility field, for legal and accounting professionals.



Giuffrè Francis Lefebvre: market-leading legal publisher in Italy, partnering law and tax professionals with publishing content and innovative services that are continually informed by the actual needs of its customers. The company is the result of a merger between the subsidiary established in Italy by Editions Francis Lefebvre and Giuffrè Editoré, acquired in 2017.

Lefebvre Sarrut Belgium, with the brands:



Larcier: thanks to its prestigious professional legal publishing brands, Larcier proposes documentary solutions tailored to the specific needs of all legal practitioners in Belgium, Luxembourg and France (lawyers, magistrates, notaries, company lawyers, etc.). Larcier also addresses the economic and HR professions in Belgium.

Indicator: legal publisher for SMEs and their advisers. Indicator offers valuable, clear and expert advice on changes to regulations and case law through its advice letters and associated portals, in addition to practical and directly applicable cases.

Intersentia: renowned Flemish legal and accounting publisher. Intersentia publishes many monographs and prestigious reviews in Dutch and English for Belgian and international academic and professional markets.



juris: number one digital legal publisher in Germany, in co-ownership with the federal government and in partnership with independent publishers.



Lefebvre Sarrut GmbH, which in 2021 acquired Tetware Business, the publishing arm of STOLLFUSS, number three in tax information in Germany, which publishes such well-known titles as Widmann/Mayer, Gosch, the magazine EFG and the tax website Stotax.

Vocational training



With effect from 1 January 2022, following the merger by absorption of Francis Lefebvre Formation, CSP DOCENDI, Dalloz Formation and ELEGIA by BÄRCHEN, became LEFEBVRE DALLOZ COMPETENCES as a result of a change of name on 3 January 2022 but retains the brands:



Francis Lefebvre Formation: a leader in training programmes for companies, banks and their boards with a catalogue of over 440 training programmes, Francis Lefebvre Formation trains over 20,000 trainees each year. Its customers include two thirds of CAC 40 and SBF 120 companies as well as numerous SMEs in all sectors.



Bärchen: specialist in training in the fields of banking, insurance and finance, Bärchen offers more than 200 training courses in financial markets. Its subsidiary Bärchen Education offers professional certifications and collaborates with numerous schools and universities to offer the most suitable courses for its customers.



Elégia: leader in social law and human resources training, Elégia also runs training programmes in health, safety, quality, environment, finance, urban planning, construction, real estate management, management and personal development. It hosts around 20,000 participants.



Dalloz Formation: over 500 practical and topical training programmes run for law professionals: lawyers, notaries, companies, accountants, bailiffs, real estate professionals, local authorities, etc.



CSP Docendi: CSP Docendi supports the development of individual skills and collective capacities of organisations by relying on innovative methods and modes of intervention, in particular through an innovative educational formula comprising two days of face-to-face training with a digital support before and after training e.

start® and e.coach® CSP Docendi offers more than 300 inter-company internships in ten major cross-departmental areas (management, leadership, project management, HR, written and oral communication, professional efficiency, QSE, customer relations/sales, finance/management).

The Group's other activities:

Support activities:

Lefebvre Dalloz SERVICES

'L'Appel Expert'.

Lefebvre Dalloz Services: created in 2014, formerly called Lefebvre Sarrut Services, it brings together the support functions of the French subsidiaries, particularly sales administration, IT, accounting, manufacturing (legal) and part of human resources. This also includes

Software applications:

Lefebvre Dalloz LOGICIELS

Lefebvre Dalloz Logiciels: created in 2016 and formerly called i-Lefebvre Sarrut, the purpose of this subsidiary is the hosting of innovative Group projects.



ELS Partnership: formed from the cooperation between Lefebvre Sarrut and Rocket Lawyer Incorporated, this subsidiary proposes an online legal assistance platform.



Francis Lefebvre e-Compliance: this subsidiary offers a global online solution to assist with compliance.



Oppus by Lefebvre Dalloz: this company, created jointly with the Nancy-based legal/tech company Oppus, in 2021 and held as a 55% subsidiary, develops and markets the first solution to verify in real time the compliance of an employment contract with legislative and contractual provisions while it is still being drawn up.



Prévisoft: Established in 2007 and joining our Group in 2021, Previsoft offers organisations of all sizes a software application for assessing and managing professional risks. The Previsoft application, designed by risk prevention experts, is a flexible, ergonomic, full-web solution that has already been adopted by more than 1,000 public and private organisations.