# FROJAL





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# 1. Presentation of the Group

Frojal is a family holding company of the descendants of Francis Lefebvre, which holds 77% of the Lefebvre Sarrut group, a European leader in legal and tax knowledge. Established in Germany, Belgium, Spain, France, Italy, Luxembourg, the Netherlands and the United Kingdom, Lefebvre Sarrut provides a comprehensive response to businesses (HR, Finance, Legal, Compliance), regulated professions (notaries, chartered accountants, lawyers, etc.) and the public sector in the areas of publishing, training and software applications. At Lefebvre Sarrut, our mission statement is enabling knowledge in order to build a fairer, more efficient and more sustainable society. The Lefebvre Sarrut group posted turnover of €555 million in 2023 and has 2,500 employees.

# 1.1. Our business model



# 1.2. Our values

Our Group is the leading intermediate-sized enterprise in its field in France and indeed in Europe. It is currently one of the leading companies in continental law. Based on this history, Lefebvre Sarrut is renowned as a group that is firmly attached to its business and human values.



Excellence. We bring our clients reliable content, high-quality training and innovative software applications.



**Sharing**. We favour a culture of collaboration and sharing of knowledge with our clients, authors and partners. These exchanges generate ties of trust and feed innovation, which in turn acts as a real growth accelerator.



**Proximity**. We encourage a culture of communication and solid relations. We favour an ecosystem of contribution, comprehension and respect in order to achieve success together and to offer our clients, our employees and society a unique experience.

# 1.3. Our mission statement

In close collaboration with its stakeholders, the Lefebvre Sarrut Group formalised its mission statement in 2022 and defined its commitments.

### Enabling knowledge for a fairer, more efficient and more sustainable society.

Lefebvre Sarrut is a family-owned European group whose roots date back more than 130 years. It was born of the merger of two families of entrepreneurs sharing the same vision.

As the European leader in legal and tax knowledge, Lefebvre Sarrut proposes innovative and effective solutions to businesses, the public sector and regulated professions so that they can understand and draw on regulations, standards and the law to develop their activities.

Throughout its development, Lefebvre Sarrut has always renewed and enhanced its offering to adapt to the challenges of a changing world, constantly striving for excellence and mutual trust with its clients. This results in a strong proximity with each of its markets, which is strengthened in this age of artificial intelligence, and in the widespread sharing of its legal, pedagogical and practical expertise throughout its ecosystem.

The investment of the Lefebvre Sarrut Group's employees and partners contributes day in day out to its success. The support and trust of its shareholders ensure the longevity of its model, by combining economic, societal and environmental performance.

Lefebvre Sarrut's commitments are based on strong convictions:



**Guaranteeing access to the law.** As leaders in legal and tax knowledge, Lefebvre Sarrut works alongside public stakeholders to support the rule of law.



**Enabling its clients to stay ahead of the curve** by constantly anticipating the changes to their business and building tomorrow's solutions with them, in particular by means of artificial intelligence. Lefebvre Sarrut invests constantly in innovation and the creation of an ecosystem of partnerships. Lefebvre Sarrut also works alongside start-ups, people in difficulty, students and other ambitious individuals to help develop their skills and ensure they share the future vision of Lefebvre Sarrut.



Identifying and understanding regulatory changes to **enable its clients to remain compliant and use the law as a lever for the development** of their business. The Lefebvre Sarrut teams study the law, provide guidance and information, and design highly reliable tools to allow professionals to improve their performance.



**Providing employees with an inspiring work environment**, proposing motivating projects and making available innovative and collaborative methods to ensure their professional and personal development.



**Contributing to building a more sustainable world**, respecting the environment and operating responsibly with all its stakeholders.

# 1.4. Our ESG commitments

Our Group and its subsidiaries have invested in corporate social responsibility for many years, by means of concrete actions such as the Ethics Charter since 2017, the Security/Privacy/Sapin 2/CSR questionnaire sent to our main suppliers since 2019, integration of our GDPR data into a dedicated management platform in France since 2019 and into the Centinela Software in Spain since 2020, creation of the Group CSR department in 2021, and formalisation of our mission statement in 2022.

In 2023, we renewed our commitment to the United Nations in the context of the Global Compact (see 1.4.1) and we submitted to an evaluation by EcoVadis to measure our progress (see 1.4.2).

# 1.4.1. UNITED NATIONS GLOBAL COMPACT

The Global Compact is an initiative launched by the United Nations in 2000 and aims to encourage companies to adopt responsible and sustainable commercial practices. Signatory companies undertake to respect ten universally known principles in the areas of human rights, labour, the environment and anti-corruption. In companies, the role of the Global Compact is to raise awareness about the importance of ethics and social responsibility in commercial activities, to promote best practices and to provide resources and tools to help companies implement these principles in their day-to-day management.

To further strengthen our commitment to environmental and societal issues, the Lefebvre Sarrut Group joined the Global Compact programme on 26 January 2022. Joining this programme is a true indicator of our commitment to social and environmental responsibility, and directly connected to the commitments deriving from our mission statement.

United Nations Sustainable Development Goals (SDGs)	Our ESG commitments	Statement reference	Significant actions/results in 2023
16 PEACE, JUSTICE AND STRONG INSTITUTIONS	Guaranteeing access to the law. As leaders in legal and tax knowledge, Lefebvre Sarrut works alongside public stakeholders to support the rule of law.	see 3.1	More than 34 million unique visitors accessed our legal content (free or paying) in Europe in 2023.  Through our partnerships and financial support, we uphold the rule of law and democracy (e.g.: partnership with the CIB, an association of French-speaking lawyers, and support for the Lawyers for Lawyers association).
8 DECENTWORK AND ECONOMIC GROWTH	Enabling our clients to stay ahead of the curve by constantly anticipating the changes to their business and building tomorrow's solutions with them.	see 3.2	In 2023, we were involved in 24 innovative projects, some in-house and others in collaboration with the ecosystem. We launched the GenIA-L project, the first European generative AI solution using reliable legal content.
8 DECENTWORK AND ECONOMIC GROWTH  16 AND STRONG INSTITUTIONS  11 INSTITUTIONS	Identifying and understanding the regulatory changes to enable our clients to remain compliant and use the law as a lever for the development of their business.	see 3.3	We have developed a European platform - "ESG by Lefebvre Sarrut" - to accompany our clients in implementing the Corporate Sustainability Reporting Directive (CSRD) and to support businesses in their transition to greater sustainability.  This platform, which serves as an onboarding tool for the CSRD, includes knowledge bases, training, production tools and news.
5 GENDER 8 DECENT WORK AND ECONOMIC GROWTH INEQUALITIES	Providing employees with an inspiring work environment, proposing motivating projects and making available innovative and collaborative methods to ensure their professional and personal development.	see 5.1ff.	We obtained the European labels HappyIndexAtWork and HybridWorkplace 2023. Employee shareholding campaigns were launched in France, Germany, the Netherlands, Belgium and Spain to allow employees to invest in the business and thus to benefit from its growth and success. We organised our first hackathon, which brought together more than 200 people, including employees, students and clients, all with one common objective: to innovate and transform the legal sector thanks to generative AI.
12 RESPONSIBLE CONSUMPTION AND PRODUCTION  COO  13 CLIMATE ACTION	Contributing to building a more sustainable world, respecting the environment and operating responsibly with all its stakeholders.	see 4.1ff.	We work with our suppliers to reduce our CO <sub>2</sub> emissions. We contacted 91% of our main suppliers in 2023 to ask them to provide us with their carbon assessment. 79% of the paper we use comes from sustainably managed forests. We developed an initial plan for reducing our emissions, in particular through our purchasing and our paper business.

# 1.4.2. ECOVADIS

In continuation of our commitments on ESG issues, the Group submitted its activities-related data to EcoVadis, the world's leading provider of sustainability ratings.

In March 2024, we obtained an overall score of 58/100, 6 points higher than the previous evaluation.

We also obtained higher-than-average scores for businesses in our sector in three categories: environment, labour and human rights, and ethics; for this last category, we obtained an "Advanced" score.











For this achievement, the Group was awarded a **bronze medal** by EcoVadis, and is thus one of the **35% best rated businesses** (we were formerly one of the top 50%).

This progress is encouraging and our goal is to continue on this path of improvement and increase our score further, in particular by systematising and strengthening our responsible purchasing efforts at both Group and subsidiary levels in 2024.



# 1.5. Presentation of the Group and its subsidiaries



Lefebvre Sarrut is a European group held by the Lefebvre family via Frojal (77%) and by the Sarrut family (23%). The **Lefebvre family, via Frojal,** is building on the legacy of its ancestor Francis Lefebvre, who founded the reference company for publishing and training in the field of tax and accounting law in the 19<sup>th</sup> century. The **Sarrut family** inherited the legacy created by Lise and Jean Sarrut, who founded Editions Législatives in 1947, establishing themselves as key players in the field of social law. Born of the alliance of these two families, the Lefebvre Sarrut Group has grown steadily thanks to a series of acquisitions in Europe. The Group is established in eight European countries: Germany, Belgium, France, Italy, Luxembourg, Spain, the Netherlands and the United Kingdom.

The seven countries included for the financial year are **Germany, Belgium, France, Italy, Luxembourg, Spain and the Netherlands**. The 13 legal entities included are: FROJAL, Lefebvre Sarrut, Éditions Francis Lefebvre, Éditions Dalloz, Éditions Législatives, Lefebvre Dalloz Services, Lefebvre Dalloz Compétences, Lefebvre Dalloz Logiciels, Oppus by Lefebvre Dalloz, Lefebvre El Derecho, Sdu, Lefebvre Sarrut Belgium, Giuffrè Francis Lefebvre, Lefebvre Sarrut GmbH and ELS Partnership BV.

# 1.5.1. LEFEBVRE DALLOZ – FRANCE

# Lefebyre Dalloz

Lefebvre Dalloz is the leader in legal and tax knowledge in France. The brand provides a comprehensive range of publishing, training, software applications and services, notably including the historical brands Dalloz, Éditions Francis Lefebvre and Éditions Législatives. Thanks to the combination of its know-how in various fields, Lefebvre Dalloz provides a comprehensive response to businesses (HR, Finance, Legal, Compliance), the public sector, regulated professions (notaries, chartered accountants, lawyers, etc.) and students.

Key figures: nearly 1,300 employees. Main office: Paris La Défense.

# 1.5.2. LEFEBVRE - SPAIN



Lefebvre is a provider of legal software and content, offering practical solutions to lawyers, law firms and their advisers, as well as innovative tools, training and advisory services. The current Lefebvre has its roots in Editions Francis Lefebvre, a company founded in 1990 in Spain, which absorbed El Derecho Editores in 2010. Following the merger with Indicator in 2011, Lefebvre-El Derecho was formed in 2015 to coincide with

the 25th anniversary of Ediciones Francis Lefebvre in Spain and embarked upon a new phase of innovation, giving it a competitive edge. In 2018, the brand name was simplified, returning to the original: Lefebvre.

Key figures: 450 employees. Headquartered in Madrid - Offices in Barcelona, Bilbao, Valencia and Seville.

# 1.5.3. LARCIER-INTERSENTIA – BELGIUM, LUXEMBOURG



Larcier-Intersentia is the commercial brand of the Belgian subsidiary Lefebvre Sarrut Belgium. A key figure in the fields of publishing, training and digital solutions, Larcier-Intersentia provides a global response to the needs of regulated professions, companies, INTERSENTIA universities and students in the areas of law and tax in Belgium and Luxembourg. Keen to address the major challenges facing the sector, Larcier-Intersentia is the result of the merger of four publishing brands: Larcier, Bruylant, Intersentia and Indicator.

Key figures: more than 200 employees. Sites: Belgium (Brussels, Berchem, Ghent, Leuven, Louvain-la-Neuve) – Luxembourg (Windhof).

# 1.5.4. STOLLFUSS / JURIS - GERMANY

# **Stollfuß Juris**°

There are two brands in Germany. Juris is the leading digital legal publisher in Germany, through a joint venture with the federal government and in partnership with independent publishers. The Lefebvre Sarrut Group also acquired Stollfuß Verlag in 2021, a tax and legal information publisher for tax advisers and legal and financial professionals.

Key figures: approximately 40 employees at Stollfuß Verlag and 200 at Juris. Sites: Saarbrücken, Bonn, Frankfurt, Berlin.

# 1.5.5. GIUFFRÈ FRANCIS LEFEBVRE - ITALY



Giuffrè Francis Lefebvre is one of the leading Italian providers of editorial solutions and latest-generation digital services for law, tax, social law and business law professionals. Created in 2018 from the merger of Giuffrè Editore founded in 1931 and Memento Francis Lefebvre, Giuffrè Francis Lefebvre supports the professional growth of its clients by providing innovative solutions suited to all needs and helps corporate professionals to find all their answers in as short a time as possible, thanks to reliable and authoritative solutions. The company also supports the public sector and collaborates with universities,

in open access to contribute maximally to the dissemination of culture. Giuffrè Francis Lefebvre provides its clients with a wide range of products and services based on authoritative content and effective consultation: books, portals, databases and digital platforms, software, cloud-based tools and face-to-face and online accredited training.

Key figures: 230 employees, 200 independent sales representatives. Sites: Milan, Rome, Varese, Macerata.

# 1.5.6. SDU - NETHERLANDS



Sdu is a leading provider of services to law and regulatory professionals. Sdu's history dates back to 1577, when official documents were created. At the time, Sdu (Staatsdrukkerij en Uitgeverij) was the Dutch State publishing house. In 1988, Staatsdrukkerij en Uitgeverij became Sdu.

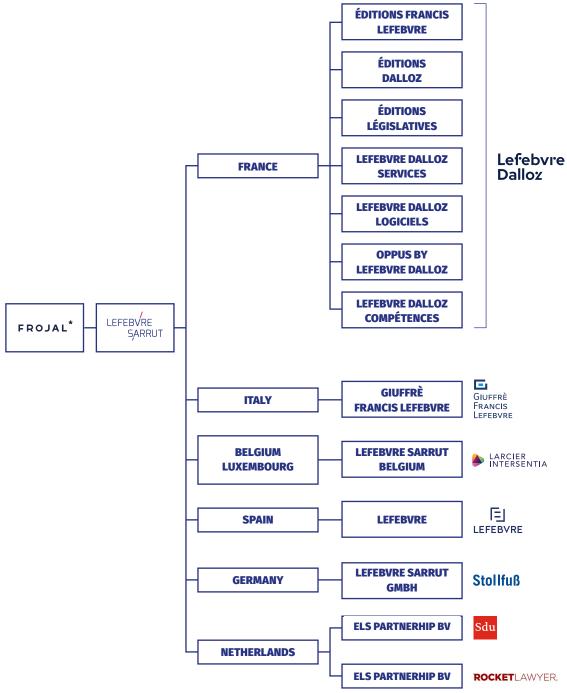
Key figures: more than 300 employees. Site: The Hague.

# 1.5.7. ROCKET LAWYER



**ROCKET**LAWYER\* Formed from an alliance between Lefebvre Sarrut and Rocket Lawyer Incorporated, this subsidiary offers an online legal aid services platform.

# — 1.5.8. ORGANISATION CHART



# - 1.6. ESG governance

Our ESG policy is based on transversal governance carried out by several bodies which coordinate and guide actions: the CSR Committee (see 1.6.1), the ESG Impact Department (see 1.6.2) and the Stakeholders' Committee (see 1.6.3).

### 1.6.1. CSR COMMITTEE

The CSR Committee, composed of **two shareholders** who are members of the Supervisory Board, the **Chairman of the Management Board of Lefebvre Sarrut** and the **ESG Impact Director of Lefebvre Sarrut**, plays an essential role in promoting corporate social and environmental responsibility in the business, ensuring that the actions of the business are aligned with the shareholder's expectations and with best CSR practices.

# 1.6.2. ESG IMPACT DEPARTMENT

The **ESG Impact Department** is responsible for measuring and improving the Group's impact from the Environment, Social and Governance (ESG) point of view, and for helping clients to understand and improve their own impacts. It aims to be exemplary in terms of compliance and to ensure that all employees gradually come to feel involved in ESG issues.

Reporting directly to the Chairman of the Management Board of Lefebvre Sarrut, the ESG Impact Department is composed of a **Group Impact team**, a **Group Compliance and Ethics team** and a **team in charge of creating ESG offers** for clients.

It functions on the basis of a horizontal organisation comprising several areas of intervention, called **project streams**, notably for the environment, social issues, compliance, non-profit actions, responsible purchasing and labels. The project streams are organised so that the operational personnel of each subsidiary work together with a representative mix of different business functions and profiles in terms of skills, seniority, hierarchical levels, etc. This allows us not only to bring together the areas of expertise needed to draw up the roadmap but also to ensure that balanced decisions are made, taking account of different perspectives and skills. This structure ensures that ESG actions are coordinated and implemented within all the subsidiaries.

The basic objective of the ESG Impact Department is to reduce the negative impacts of the Group and increase the positive ones, by working actively on environmental, social and governance issues.

# 1.6.3. STAKEHOLDERS' COMMITTEE

The Stakeholders' Committee is composed of shareholders, employees, clients, suppliers and partners. It allows for dialogue between representatives of the Group and all its members. It is a place for exchange to inspire and gather expectations and constructive opinions in a spirit of collective intelligence. Furthermore, this committee is structured around committed and competent individuals who work every day to ensure the growth of the Group.

The Stakeholders' Committee meets four times a year. The committee's main mission is to accompany the Group and its subsidiaries in aligning the strategy, the mission statement and the five corporate social responsibility commitments.

# 1.6.4. INTEGRATION OF ESG ISSUES INTO THE STRATEGY

In a world in which sustainability and social responsibility have become major concerns, our Group and its subsidiaries are committed to fully integrating environmental, social and governance issues into their overall strategy. We firmly believe that the success of a business cannot be uncoupled from its impact on society and the environment.

To ensure a comprehensive and consistent approach, **the management team** is closely involved in defining the ESG strategy. Each member of the management team is aware of the importance of these issues and commits to integrating them into the company's strategic decisions. A part of the management team's variable bonuses is conditional upon the attainment of specific ESG objectives, so as to ensure collective responsibility in the implementation of our commitment to sustainability.

To ensure effective governance and proactive management of ESG challenges, a **dedicated Group ESG Impact Department** was created. It works closely together with the **Stakeholders' Committee**, the **CSR Committee** and the **management team** to ensure that ESG aspects are taken into account at all levels of the organisation.

We also recognise that our ESG strategy could not be successfully implemented without the involvement and understanding of all our **operational teams**. So to conduct our materiality analysis and define our strategic priorities (see 2.2), we set up a Steering Committee which comprises employees from each subsidiary, representing the various functions of the business, and with different levels of seniority. Similarly, to deploy our strategy, we rely on an organisation based on project streams, also including employees representing the various skills and different hierarchical levels in the Group (see 1.6.1).

We have also put in place **training programmes** to raise awareness and instil a feeling of responsibility among all our employees as to the importance of ESG issues. These training programmes aim to provide them with the knowledge necessary to integrate these issues into their day-to-day work and contribute actively to the attainment of our ESG objectives.

# 2. Our ESG policy

In 2022, we defined our mission statement, marking a significant step in our commitment to societal responsibility. Since then, we have been actively involved in continuous dialogue with our stakeholders in order to bring this mission statement to life through concrete actions. In 2023, we undertook a materiality analysis (see 2.2) with all our stakeholders, internal and external (see 2.1), allowing us to identify the main ESG risks and challenges and to fine-tune our strategy (see 2.3).

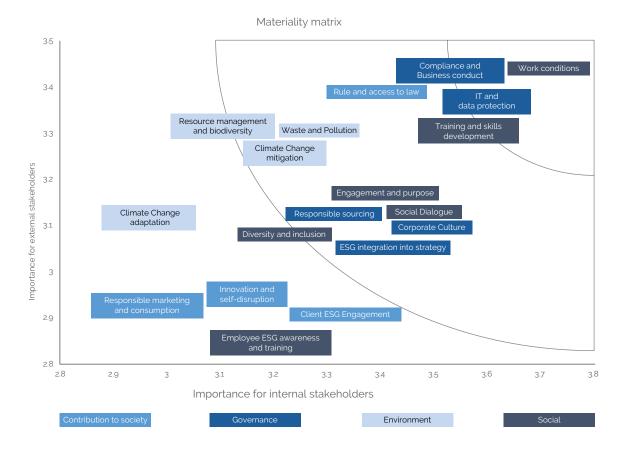
# 2.1. Mapping of stakeholders

Stakeholders, whether internal or external to the business, are the actors engaged in our activity. Their interests, their expectations and their perceptions exert a direct influence on our reputation and long-term success. For this reason, it is essential not just to identify them, but above all to understand them and to build trust-based relations with them.



# 2.2. Materiality analysis

Lefebvre Sarrut maintains a constant dialogue with its stakeholders, who are at the heart of its thinking on its activities and strategy. In 2023, we undertook the work needed to conduct a Group materiality analysis with more than 1,300 people (including some 500 external stakeholders). Presented in the form of a matrix, this analysis allows us to map the issues deriving from our mission statement and the risks and opportunities linked to our activities, and prioritise them in order of importance to our stakeholders. The following matrix presents the priority issues resulting from this work.



The issues reported in this statement are those that present a significant associated risk for the Group or a major opportunity already identified:

- contribution to society: access to the law, innovation and self-disruption, customer ESG engagement;
- environment: mitigation of climate change, adaptation to climate change, biodiversity and management of resources;
- social: working conditions, training and skills development, diversity and inclusion;
- governance: compliance and conduct of business, purchasing, IT and data protection.

The description of the risks and opportunities linked to these issues is detailed hereunder (see 2.3.2). These issues are subject to change depending on the double materiality analysis currently under way and the analyses and action plans that result from it.

# 2.3. ESG policy focuses

The Group defined its **mission statement** in 2022, an important milestone in its social responsibility trajectory. Since then, we have engaged actively in continuous reflection with our stakeholders in order to give concrete expression to this mission statement through tangible commitments and actions. This constant dialogue allows us to make sure that our mission statement is given proper expression, taking account of the expectations and needs of all parties concerned.

In 2023, we carried out a **materiality analysis** with our stakeholders to identify the main ESG risks and issues and arrange them in order of priority. This process is also based on an analysis of Group risks carried out in December 2022, giving us an overall integrated view of the risks facing the Group. This proactive approach ensures better understanding of the environmental, social and governance impacts and helps us take appropriate measures to mitigate them and manage them effectively.

The Group's Statement on extra-financial performance derives from all these elements.

The Group's ESG policy is structured around four broad strategic focuses, which guide our actions and our initiatives:

- · contribution to society: being a major player in law and compliance;
- environment: contributing to a more sustainable world;
- · social: providing an inspiring work environment;
- · governance: being exemplary in our own compliance

By implementing these strategic focuses consistently and integrating stakeholders' concerns, the Group strengthens its social responsibility and contributes actively to a sustainable future for all.

# — 2.3.1. OUR CHALLENGES

Each of our strategic focuses breaks down into various challenges which are the subject of a roadmap shared with our internal stakeholders.

Focus 1	Focus 2	Focus 3	Focus 4
Being a major player in law and compliance	Contributing to a more sustainable world	Providing an inspiring work environment	Being exemplary in our own compliance
Access to the law	Mitigating climate change	Working conditions	Compliance and business ethics
Innovation and self-disruption	Adaptation to climate change	Training and skills development	Responsible purchasing
Customer ESG engagement	Biodiversity and resource management	Diversity and inclusion	Cyber-security and data protection

### 2.3.2. MAIN NON-FINANCIAL RISKS

This table sets out and describes the main non-financial risks identified within the Group.

This analysis was carried out from the perspectives of both risk and opportunity by the ESG Impact team and the *project* streams (see 1.6.2), with the support of the steering committee in charge of the materiality analysis (see 2.2).

These risks and opportunities take account of the positive and negative impacts generated by the economic, social and natural environment on the development, performance and results of the Group and also of the positive and negative impacts of the Group on its economic, social and natural environment.

# — 2.3.2.1. Contribution to society

Opportunities Risks

Being a major player in law and compliance						
Ensuring access to the law, working alongside public actors to uphold the rule of law.	Access to the law	Difficulty in making the law intelligible and easily accessible while keeping prices competitive for the client and sufficient to ensure the company's profitability, which could run counter to the ambition of offering access to as many people as possible and the Group's economic viability.				
Enabling our clients to stay ahead of the curve by constantly anticipating the changes	Innovation and	Restriction of investments in innovation, especially in moments of crisis and budget pressures, and operating "in isolation", insufficiently open to the market and the legal ecosystem.				
to their business and building tomorrow's solutions with them.	self-disruption	Difficulty in anticipating the future needs of our clients and not having, at the right time, the skills needed to respond or the knowledge of the necessary technologies.				
Identifying and understanding the regulatory		Overall fall in customer satisfaction with all our products and services.				
Identifying and understanding the regulatory changes to enable our clients to remain compliant and use the law as a lever for the	Customer ESG engagement	Not being perceived by our clients as being able to support them with ESG issues.				
development of their business.		Difficulty in projecting these regulatory changes as business opportunities.				

# **2.3.2.2. Environment**

Opportunities Risks

Contributing to a more sustainable world					
Acting on the business model to create a low-		Insufficient influence on our suppliers to reduce their carbon footprint.			
carbon value chain compatible with the 1.5°C trajectory.	Mitigating climate change	Participation in increasing global temperature via our activities and services, our employees' habits and our suppliers' practices.			
Giving priority to low-tech and energy- efficient innovations with a view to their use reducing the company's energy consumption.	Adaptation to climate change	Substantial energy consumption, even increased consumption through our activity and services.			
Preserving and restoring terrestrial ecosystems, ensuring sustainable use of the resources linked to forest products: managing forests sustainably, combating desertification, halting and reversing the process of soil degradation and bringing an end to the impoverishment of biodiversity.	Biodiversity and resource management	Degradation of natural ecosystems, particularly forests, through the demand for paper and/or mining. Forest degradation, deforestation. Depletion of carbon sinks.			

# — 2.3.2.3. Social

Opportunities Risks

Providing an inspiring work environment						
Contributing to the creation of decent jobs and the improvement of employee wellbeing and standard of living. Ensuring decent working conditions and hours. Life/work balance and positive effects on employees' friends and families.		Having governance and an operating mode that does not sufficiently favour team work and the proposal of motivating projects. Failure to adapt to the new environment resulting from the implementation of hybrid working.				
Contributing to putting an end to all forms of discrimination against women. Contributing to ensuring the full and effective participation of women and their access on a completely equal footing to management positions at all decision-making levels, in political, business and public life. Ensuring that women and men all have the same access on equal terms: internally and externally, particularly through our products and services. Ensuring that women know their rights as regards equality, preventing situations of discrimination, harassment, etc.	Working conditions	Risk that inequality between men and women could increase. This may be manifested in salary differences, unequal career opportunities, persistent gender stereotypes and other forms of gender-based discrimination.				
Contributing to improving employees' employability, by means of career management and skills development depending on sectoral transformations so that they can be actors equipped to contribute to a fairer society.	Training and skills development	Insufficiency of the tools and training necessary for the proper accomplishment of individual and collective tasks, resulting in loss of knowledge or skills within the organisation and limited professional mobility. If this situation is allowed to deteriorate it can have disastrous consequences for both the quality of life of the individuals and the overall performance of the company.				
Contributing to empowering and integrating everyone through economic activity, favouring their social, economic and political integration, regardless of their age, gender, disability, race, ethnicity, origins, religion or economic or other status.	Diversity and inclusion	Lack of opportunities for young people, leading to social exclusion. Loss of potential talent for the organisation.				

# — 2.3.2.4. **Governance**

Opportunities Risks

Being exemplary in our own compliance						
Contributing to the protection and rights of whistleblowers by raising awareness of the legislation in force within our value chain, especially our clients via our products and services, and by going further.	Compliance and business ethics	Lack of attention to whistleblowing reports, which may reduce the number of reports reaching the company and encourage bad practices internally and with suppliers and sub-contractors.  Violation of whistleblowers' rights due to lack of whistleblowing mechanisms.  Contribution to corruption and to the practice of bribery in all its forms.				
Contributing to the strengthening of the economic situation of companies/business partners. Guaranteeing payment/transactions for clients and suppliers in the value chain. Ensuring responsible management of relations with suppliers, including payment practices, and with sub-contractors.	Responsible purchasing	Long-term economic survival of businesses in the value chain and their employees called into question by the lack of ethical and equitable commercial practices. Continuation of low-qualified jobs and casual labour, exacerbated lack of employee development on the part of trading partners.				
Contributing to respect for privacy and personal data.	Cyber-security and data protection	Contribution to violation of respect for consumer/client privacy. Lack of protection of their personal/sensitive data.				

# 2.3.3. RISKS AND INDICATORS

This table presents the key indicators of the ESG roadmap of the Group and its subsidiaries covering the main non-financial risk factors and basic challenges identified. The various elements (challenges/risks, policies and objectives, actions and results) are detailed later on in this statement (see 3.ff.)

The major risks and associated key performance indicators appear in bold followed by an asterisk.

# - 2.3.3.1. Contribution to society

	Being a major player in law and compliance						
Challenges	Risks	Risk description	Indicators	Statement reference			
Access to the law	Contradiction between the ambition of guaranteeing access to the law and the Group's economic viability	Difficulty in making the law intelligible and easily accessible while keeping prices competitive for the client and sufficient to ensure the company's profitability, which could run counter to the ambition of offering access to as many people as possible and the Group's economic viability.*	Number of users of our online content and solutions* Number of visits to our online content and solutions Amount of donations to promote access to the law	see 3.1			

Being a major player in law and compliance					
Challenges	Risks	Risk description	Indicators	Statement reference	
Innovation and self-disruption	Failure to anticipate clients' future needs	Restriction of investments in innovation, especially in moments of crisis and budget pressures, and operating "in isolation", insufficiently open to the market and the legal ecosystem.	Number of innovation initiatives created internally or with the ecosystem*	see 3.2	
·		Difficulty in anticipating the future needs of our clients and not having, at the right time, the skills needed to respond or the knowledge of the necessary technologies.	Number of hours dedicated to innovative projects (R&D + IT)		
		Overall fall in customer satisfaction with all our products and services.*	Client NPS*		
Customer ESG engagement	Insufficient perception by our clients of our role as a major player in law and compliance	Not being perceived by our clients as being able to support them with ESG issues.	Client NPS on our ESG and compliance solutions (publishing + software + training)	see 3.3	
		Difficulty in projecting these regulatory changes as business opportunities.	Percentage of revenues generated by ESG and compliance offers		

# \_\_\_\_ 2.3.3.2. **Environment**

Contributing to a more sustainable world					
Challenges	Risks	Risk description	Indicators	Statement reference	
		Insufficient influence on our suppliers to reduce their carbon footprint.*	% of our major suppliers who have been asked to provide a carbon assessment*		
Mitigating climate change	Participation in uncontrolled increase of GHG	Participation in the increase of global temperature via our activities and services, our employees' habits throughout the value chain (suppliers: choice of suppliers with irresponsible practices and high carbon assessment).	Scopes 1, 2 and 3 of the carbon assessment Percentage of the carbon assessment calculated (as opposed to inferred from financial data)	see 4.1	
Adaptation to climate change	Contribution to increasing world energy consumption and the associated effects	Substantial energy consumption, even increased consumption through our activity and services.	Electricity consumption of buildings Gas consumption of buildings	see 4.2	

Contributing to a more sustainable world					
Challenges	Risks	Risk description	Indicators	Statement reference	
Biodiversity and resource management	Degradation of natural ecosystems such as forests, and mining	Degradation of natural ecosystems, particularly forests, through the demand for paper and/or mining. Forest degradation, deforestation. Depletion of carbon sinks.	Percentage of PEFC or FSC paper in overall consumption	see 4.3	

# — 2.3.3.3. Social

Providing an inspiring work environment					
Challenges	Risks	Risk description	Indicators	Statement reference	
Working	Spread of employee dissatisfaction	Having governance and an operating mode that does not sufficiently favour team work and the proposal of motivating projects.* Failure to adapt to the new environment resulting from the implementation of hybrid working.	Employee NPS* Participation rate in the HappyAtWork and HybridWorkIndex questionnaire	- see 5.1	
conditions	Lack of reduction or exacerbation of inequality between men and women	Risk that inequality between men and women could increase. This may be manifested in salary differences, unequal career opportunities, persistent gender stereotypes and other forms of gender-based discrimination.	Wage difference between men and women		
Training and skills development	Lack of opportunities, increase in casual jobs, loss of know- how	Insufficiency of the tools and training necessary for the proper accomplishment of individual and collective tasks, resulting in loss of knowledge or skills within the organisation and limited professional mobility.  If this situation is allowed to deteriorate it can have disastrous consequences for both the quality of life of the individuals and the overall performance of the company.	% of the wage bill dedicated to training % of men and women trained in the year % of current employees having been on mobility assignment during the year	see 5.2	
Diversity and inclusion	Contribution to the social and economic exclusion of persons from minorities and/ or under-represented groups	Lack of opportunities for young people, leading to social exclusion. Loss of potential talent for the organisation.	% of young people on internships or work-study schemes Percentage of employees by age bracket	see 5.3	

# — 2.3.3.4. **Governance**

Being exemplary in our own compliance					
Challenges	Risks	Risk description	Indicators	Statement reference	
Compliance and business ethics	Violation of whistleblowers' rights Hindrance of economic development and poor allocation of resources at the macro-economic level and in our value chain	Lack of whistleblowing mechanism/insufficient attention to whistleblowing reports, which may reduce the number of reports reaching the company and encourage bad practices internally and with suppliers and sub-contractors. Violation of whistleblowers' rights due to lack of whistleblowing mechanisms.* Contribution to illicit financial flows/the informal economy, organised crime, corruption and bribery in any form whatsoever.	% of reports processed* Number of whistleblowing reports	see 6.1	
Responsible purchasing	Long-term economic survival of businesses in the value chain and their employees called into question	Long-term economic survival of businesses in the value chain and their employees called into question by the lack of ethical and equitable commercial practices. Continuation of low-qualified jobs and casual labour, exacerbated lack of employee development on the part of trading partners.	% of suppliers who have signed the Group's Charter	see 6.2	
Cyber-security and data protection	Contribution to cyber- attacks and breaches of data confidentiality	Contribution to violation of respect for consumer/client privacy. Lack of protection of their personal/ sensitive data.	Number of countries in which a cyber-security validation procedure for all projects has been formalised	see 6.3	

# 3. Contribution to society: being a major player in law and compliance

As an expert in legal and tax training and information, Lefebvre Sarrut is committed to promoting the law and to explaining it to as many people as possible (see 3.1.). Our ambition is to propose innovative solutions (see 3.2) while at the same time turning regulatory constraints into opportunities for our clients (see 3.3).

# 3.1. Access to the law

# 3.1.1. CHALLENGES/RISKS

Access to the law is a **crucial feature of a democratic society**, since it ensures equality before the law and allows each person to defend or assert his or her rights and duties.

Our Group recognises the capital importance of these issues and we collaborate with the public actors to ensure access to the law.

We are conscious of the difficulty of making the law intelligible and easily accessible, while keeping prices competitive for clients, yet sufficient for the company's profitability.

# 3.1.2. POLICY IMPLEMENTED AND OBJECTIVES

As the European leader in the legal and tax fields, committed from the outset to **promoting and explaining the law**, and because it is one of the objectives deriving from our mission statement, we are committed to offering **access to the law** to as many people as possible.

This includes, among other things, content offered at competitive prices in the face of competition that is now global. The aim is to strike the right balance between prices that are accessible to our clients and sufficient to ensure the economic equilibrium of the company.

We also support **associations** and **social enterprises** that commit to increasing access to the law, in particular for vulnerable populations.

In parallel, we must focus on **making the law intelligible** in our publications, in our solutions and in our training for a diverse audience, with very different levels of expertise (law experts, students, company managers, etc.).

Lastly, our ambition is to provide our clients with neutral and impartial publications of law texts, with an approach to interpretation free of stakeholder influence.

Our objectives				
Dissemination of legal content	Offering access to the law to the greatest possible number of people, while keeping prices competitive for clients yet sufficient for the company's profitability.  Making the law more intelligible and/or operational.			
Non-profit actions	Supporting associations and social enterprises that commit to increasing access to the law.			

# 3.1.3. OUR ACTIONS AND RESULTS

Our Group and its subsidiaries work on a daily basis to procure access to the law for as many people as possible (see 3.1.2.1) and to develop initiatives and/or products to make the law more intelligible and operational (see 3.1.2.2).

In 2023, we counted <u>more than 34 million unique visitors</u> in Europe and more than 102 million visits to our online content and solutions, free and paying<sup>(1)</sup>.

We donated €301,963 to associations that work to ensure access to the law.

# — 3.1.3.1. Maximising public access to the law

Maximising public access to the law while maintaining the company's profitability can be a difficult challenge. To reconcile these apparently conflicting objectives, we have adopted a multipronged approach:

- an equitable charging schedule and **equitable sales offers** for our products, software applications and training programmes for all our clients (particularly businesses, legal and accounting professionals, schools and universities) for maximum dissemination;
- provision of **free online content** to inform current and future professionals in support of their activity;
- actions to **promote the law and/or uphold the rule of law and democracy** aimed at non-professionals: young people and citizens (profit-making or non-profit);
- non-profit actions in favour of the most vulnerable populations (such as foreigners or prisoners, for example).

# — 3.1.3.1.1. Solutions for businesses and current and future legal and accounting professionals

Our Group is committed to facilitating access to quality legal information and to offering training opportunities to upgrade professional skills. We firmly believe that access to reliable information and continuous training contributes to improving legal practice and to bringing about a fairer society.

<sup>1.</sup> Please note that the replacement of Google Analytics by other audience and usage analysis solutions for certain websites, in the interests of the protection of our users' personal data, means that continuity on the monitoring of 2023 is not exact. A comparison of 2022 and 2023 is therefore not entirely possible, although the orders of magnitude of the data are similar.

### — 3.1.3.1.1.1. Online documentary solutions



Our websites and legal databases offer professionals and students easy access to a variety of legal content such as news items, summaries, comments and in-depth analyses written by experts. Our objective is to provide our clients with **transparent**, **verifiable**, **reliable** and **impartial information** thanks to the efforts of our teams of editors, authors and expert partners.

To simplify access to this content and disseminate the law, **partnerships** have been put in place, such as that with the **Paris bar** in 2023. This partnership allows all lawyers registered with the Paris bar to access the resources indispensable to their practices (news items, case law, codes and practical tools) on civil procedure, criminal procedure and administrative proceedings. In **Belgium**, similar partnerships exist with various bars (Mons, Verviers

and Tournai) and with the Ministry of Justice. This means that all Belgian magistrates and clerks of court have access to our Strada lex platform.

In the Netherlands, we have concluded a partnership with the **Praktizijns-Sociëteit foundation** to offer lawyers providing legal aid subsidised by the State access to the Rechtsorde legal information portal at a preferential rate. This website provides not just access to official Dutch sources but also practical documentation and a search engine enhanced by AI technologies.

As for **students**, a framework agreement with French universities aims to make databases available to students to help them with their studies. Students also have free access to the Dalloz Actu Etudiant website which offers in particular practical case studies and comments on rulings. This allows a broad public to easily access essential legal information with no financial restrictions.

In Belgium, framework agreements allow the academic sector to access the content at a preferential price for purposes of teaching and learning, both for teachers and academic personnel and for students.

In addition, the vast majority of our websites such as **Strada lex Europe** and **Open Lefebvre Dalloz** allow **completely free access to legal information**. On numerous Group websites, our news threads and case law decisions are also accessible free of charge.

Lastly, it should be noted that our Dutch subsidiary Sdu has been the provider of official data to the State website **Overheid** since 2011. This website provides free access to Dutch laws and regulations, similarly to Legifrance in France.

### — 3.1.3.1.1.2. Training and webinars



for businesses and legal and accounting professionals to enhance their skills. These training programmes can be re-packaged and made to measure according to our clients' specific needs (continuous training, upskilling, reconversion, etc.). Our range of training programmes is complete, ranging from short, one-hour formats ("The Basics") to training programmes that award certificates, where appropriate in partnership with schools such as the Ecole Supérieure des RH or Paris Dauphine University.

The Group also offers a wide range of training programmes

We have put in place a **dual learning system**, which allows the simultaneous running of training programmes both face to face and remotely. Learners are thus free to choose to follow the training programmes in our catalogue either at our premises or by video conference with no constraints

as regards travel.

As part of our e-learning training programmes, we have developed **digital formats** to facilitate and optimise learning: our formats are **adapted to the hard-of hearing and the visually impaired**; they are centred on the learner's needs and seek to make the learner an active part of the process.

To respond to the obligation of continuous training for certain professionals, for example lawyers, we have designed specific training programmes such as the **Ateliers Omnidroit d'Avignon** (France) which provide up to 20 hours of training on a choice of 32 topics, specially selected and developed for lawyers.

In parallel with these fee-paying training programmes, **numerous webinars** are run and are **accessible free of charge**. One particular example is the conference entitled "Sapin II Law: seven years of reflection and practice", with the participation of former minister Michel Sapin himself. In France, we held more than 100 webinars in 2023. The same approach exists in Spain, with numerous **aulas abiertas Lefebvre** (open classes). For example, in 2023, we ran sessions on the fight against tax fraud and the new requirements as regards business management software applications and on business cyber-security.

# — 3.1.3.1.2. Promotion of the law and upholding the rule of law and democracy

### —— 3.1.3.1.2.1. Promoting and explaining the law

The law can sometimes seem complex and intimidating for citizens and especially for young people. This may be due to the specific legal terminology, the complexity of legal procedures and the perception of a certain opacity in the legal system. However, it is essential to counter this fear and to make the law more accessible and comprehensible for all. To respond to this challenge, our Group has put in place various actions aimed at demystifying the law and facilitating its comprehension.

In Italy, the **Costituzione aperta a tutti** is one initiative renewed in 2023 in collaboration with the Italian Ministry of Education, which addresses schools and all citizens wishing to understand the Italian Constitution and institutions. The project comprises a cycle of meetings in various locations during which expert participants from the worlds of law and education lead debates on the Constitution to explore the links between knowledge, culture, liberty and society.







In France, one example is the publication of the **Junior Code**, **Rights and Obligations of the Under-18s** which aims to make parents and teenagers more familiar with the rules and their concrete application in school and in daily life. Texts of laws, decrees and circulars are commented on with clarity and simplicity: practical questions on life at school, in the family and in society are addressed.

Also of note are the **regular contributions of our expert writers in the general public media,** such as Béatrice Hingand, director of Tax-Accounting Editing Lefebvre Dalloz, who writes a column explaining simply and concretely the new tax features of the individual tax declaration. In April and October 2023, we also collaborated with the French daily Le Monde on "Rencontres de la fiscalité" (Tax Get-togethers), in particular on the subjects of withholding tax at source and the fight against tax fraud.

## —— 3.1.3.1.2.2. Upholding the rule of law and democracy

Our Group and its subsidiaries uphold the rule of law and democracy which are the basic principles ensuring respect for the rights and freedoms of individuals, and the citizens as a whole in the governance of a country.

Larcier-Intersentia and Lefebvre Dalloz are partners in the **International Conference of Bars of Common Legal Tradition** (CIB). The CIB aims in particular to advocate for and promote the rights of defence and the rules of equitable process and to promote and monitor respect for the fundamental rights, the rule of law, values of justice and good governance.

We also support the **association Lawyers for Lawyers**, a network of lawyers based in the Netherlands that defends colleagues who are threatened or hindered in the exercise of their profession.

Through the **publication of various works**, we also participate actively in upholding the rule of law and democracy. Of mention are the publication of the following works in 2023: *La justice pénale internationale au service de la paix mondiale* (International Criminal Justice in the Service of World Peace, Lefebvre Dalloz), *L'école et la République* (School and the Republic, Lefebvre Dalloz) and *L'intelligence artificielle face à l'état de droit* (Artificial Intelligence and the Rule of Law, Bruyant). Also worth mentioning is the publication of the first *Code pénitentiaire* (Prison Code, Lefebvre Dalloz), which includes French and international texts contributing in particular to safeguarding respect for the rights of prisoners.





We also collaborate regularly with public actors on events. For example, on 29 March 2023, the Lefebvre Dalloz teams in France took part in the **General Estates round tables in the Senate** and Claire Demunck, editor-in-chief of the Dalloz AJCT monthly legal review spoke on the subject of the simplification and improvement of the "rules factory". Also, on 17 May 2023, Giuffrè Francis Lefebvre co-organised the **conference "Pouvoir et Constitution"** (Power and Constitution) in the Italian Chamber of Deputies in Rome on the occasion of the 75th anniversary of the Constitution.

### — 3.1.3.1.2.3. Supporting vulnerable populations

Our Group and its subsidiaries support associations that act to safeguard access to the law, and also participate in social or humanitarian actions in exceptional circumstances.

These associations include:







- the Francis Lefebvre Foundation, a family foundation under the Fondation de France
  which advocates for access to rights and to training in all fields of general interest,
  in particular those of solidarity, education and the environment; in particular it
  supports the DeQuelDroit association, which facilitates the integration of foreign
  populations in the PACA region. DeQuelDroit aims to collect, sort, insert and make
  available the most relevant case law in the field of foreigners' rights throughout the
  national territory;
- the **Immigration Guidance association**, which distributes the application REFUGEES@ Business. This application explains the regulations in force in the host countries (the Netherlands, France, Germany, Spain, Italy, the UK and Belgium), to make it easier to start up a professional activity there;
- the **association Résonances Humanitaires** which accompanies humanitarian actors in their professional careers once their humanitarian mission is over;



 the Spanish association Dádoris which provides financial and other support for students with outstanding academic records but insufficient material resources to be able to continue their higher studies.

Other *pro bono* actions were undertaken in 2023, such as the distribution of 25 boxes of legal works (basically codes and criminal law literature) for **prisons** in Belgium. This project was carried out in collaboration with the Belgian General Directorate of Prisons.



Also notable, in France, was the **Trophy of the magazine "Direction[s]" (Management),** which rewards exemplary, remarkable and replicable initiatives carried out by managers in the social and medico-social sectors and their teams, under the patronage of the Ministry of Solidarity and the Family. In 2023, the award went to the Colibri project, which aims to match the HR needs of the specialised home for the disabled and the inclusive supply of labour of the insertion workshops and sites of AFEJI in Hauts-de-

France. The arrangement responds to a female public often excluded from the field of insertion through economic activity by the nature of the activities, while at the same time proposing a step-by-step accompaniment.



Lastly the Group and its employees showed exceptional motivation by contributing a donation of €40,900 to the **Red Cross for Morocco** after the 2023 earthquake. Although our actions are mainly geared to access to the law, the extent of this disaster led us to take part in the rescue efforts.

# — 3.1.3.2. Making the law more intelligible and/or operational

# — 3.1.3.2.1. Improving the user experience

To facilitate the use of our traditional databases providing access to reference legal information and its analysis, we work to continuously improve our client experience.

Specifically, we continuously improve our user interfaces thanks to legal design and co-construction with users. Legal design is a discipline that combines design and the law with the aim of making the law and legal processes more accessible. This approach places the emphasis on the human aspect and clear legal language, using design principles.

Whether for existing solutions or for the creation of new products or services, we place users at the centre of our process. Their needs and expectations guide our decisions and allow us to propose user-friendly and intuitive interfaces. We organise feedback and test sessions with our users in order to hear their opinions, their needs and their suggestions. This feedback allows us to identify points for improvement and to adapt our interfaces accordingly.

For example, legal design tools were created in Belgium to help lodge appeals properly and to determine which jurisdiction to choose in civil cases. These tools have been integrated into the Strada lex database.

We have incorporated AI tools into searches for legal documentation to increase the relevance of the results and to optimise understanding of the responses, notably with the GenIA-L project (see 3.2.3.2). Also noteworthy is the inDYSpensable project which arose from our hackathon (see 3.2.3.1.2) and which aims to generate more accessible content for dyslexic persons thanks to a device based on Al.

### — 3.1.3.2.2. High-performance solutions and software applications

Besides improving our existing solutions, we design software applications to improve our clients' performance in their legal or paralegal operations within a secure framework.

**ROCKET**LAWYER® For example, **Rocket Lawyer** allows reliable legal documents to be created for the business or the family and provides access to legal guides on hundreds of subjects of interest to private individuals and VSEs/SMEs and introductions to lawyers for legal consultations.



Oppus is a software application that accelerates, simplifies and secures document management for employment contracts and HR documents in France; since 2023, it has included an e-signature module.



In Italy, the Cliens Cube e-Justice module allows for digital editing and sending for the filing of documents with chancelleries of all the Italian judicial offices. It is an entirely cloud-based system, capable of interfacing with external applications. In addition, the Firmo smart solution is an online platform allowing any document or contract to be signed remotely with full legal validity.



In the Netherlands, the Evidend solution digitises the register of shareholders and allows Dutch notaries to access, share and/or amend the information at any time, in total security.

Centinela Compliance (in Spain) and GoComply (in Belgium and Luxembourg) are platforms designed to automate compliance processes and to monitor their correct application within companies (whistleblowers, AML).

# — 3.1.3.2.3. Content and formats to make the law more intelligible

We strive to improve understanding of the law in all the countries where the Group is present by developing content and formats. To this end, we produce **short videos** presenting the latest case law in areas of the law such as business law, available, for example, on the website efl.fr. These videos allow users to broaden their knowledge while at the same time offering an enjoyable learning experience. We also produce **podcasts**, such as those available on the Lefebvre Dalloz Legal and Accounting Podcasts channel which present in particular the latest trends and news by sector (tax, social, criminal, etc.), and those proposed by Larcier-Intersentia, in the Journal des Tribunaux (Courts Gazette) and the JLMB (case law of Liège, Mons and Brussels) review.



Furthermore, we publish **white papers** containing detailed information on specific legal subjects. Our white papers are written in an accessible style, avoiding excessive legal jargon in order to make the legal concepts more accessible. They provide clear explanations of the rules in force and offer practical advice to help readers find their way through an often complex legal landscape.

On the training front, in France we have developed a methodology called **Lefebvre Dalloz Compétences pedagogical signature** which uses the cognitive sciences to respond to the needs of an adult in training, drawing, for example, on the principle of the flipped classroom or by consolidating learnings through play.

Objectives	Indicators	Results	Progress	Remarks	2028 objectives
Offering access to the law to the greatest possible number of people, while keeping prices competitive for clients yet sufficient for the company's profitability.	Number of users of our online content and solutions*	34 million	7	The replacement of Google Analytics by other audience and usage analysis solutions for certain websites, in the interests of the protection of our users' personal data, means that continuity on the monitoring of 2023 is not exact.	Growth
	Number of visits to our online content and solutions	102 million	1		Growth

Objectives	Indicators	Results	Progress	Remarks	2028 objectives
Supporting associations and social enterprises that commit to increasing access to the law.	Amount of donations to promote access to the law	€301,963		The Group and its employees showed exceptional motivation by contributing a donation of €40,900 to the Red Cross for Morocco, not counted in this indicator.	Stability or growth

# 3.2. Innovation and self-disruption

# 3.2.1. CHALLENGES/RISKS

Faced with competition and despite budget pressures, our challenge is to continue to invest in innovation in order to remain abreast of technological, legislative and societal changes.

We must also **continue to place our clients at the heart of our development strategy**, which implies anticipating the creation of products and services with innovative solutions to meet the expectations of our clients, both today and in the future. This includes the advance planning of our technological and skills requirements.

Lastly, we must be careful not to work "in isolation" and to remain constantly open to the market and the legal ecosystem.

# 3.2.2. POLICY IMPLEMENTED AND OBJECTIVES

Faced with these challenges, we must resolutely pursue our **investments in innovation** and anticipate the creation of products and services in line with the requirements of the future, both within the Group and with the ecosystem. This requires financial investments in research and development, in the creation and experimentation of innovative new products and services wherever the Group is active, in the continuous training of our employees and in hiring new skills in order to integrate the latest technologies and operational practices.

Beyond financial and human investments, this also involves the dissemination of a culture of innovation, which implies the acceptance of failure and pivot phases.

Lastly, we must ensure that we **maintain open and constructive relations with our entire ecosystem** as a source of inspiration and innovative partnerships.

Since innovation necessarily requires a number of tests and failures, we will measure the number of proofs of concept (POCs) deployed each year with the goal of increasing their number.

We will also monitor the number of hours dedicated to research and development.

Our objectives				
Innovate with the ecosystem	Spread the culture of innovation and maintain open and constructive relations with our entire ecosystem as a source of inspiration and innovative partnerships.			
Investments in innovation	Anticipate the future needs of our clients and make sure we have the skills needed to respond to them or the knowledge of the necessary technologies.			

# 3.2.3. OUR ACTIONS AND RESULTS

# — 3.2.3.1. Actions linked to co-development programmes

In 2023 there were a total of <u>24 innovation projects</u> resulting from internal work or work in collaboration with ecosystem players, five projects more than in 2022.

### — 3.2.3.1.1. Employee InnovAction programme

The InnovAction "intrapreneurship" programme is open to all our employees, allowing them to create and develop new concepts, products and services to best respond to the emerging needs of our clients. Each employee selected joins a European team and devotes two days a week, for around three months, to the development of their project, supported by expert coaches incubating innovative ideas.



In 2023, around twenty employees participated in this programme and collaborated on four projects, three of which resulted in offers now available to our clients. For example, **Stay Safe** is a platform resulting from this programme and which aims to help businesses enhance the safety of each employee, starting with gender-based violence. Its actions range from awareness raising and training to specific support in cases where employees find themselves in a difficult situation.

# — 3.2.3.1.2. Lefebvre Sarrut LightSpeed Hackathon

In 2023, we organised our first **LightSpeed Hackathon**: six Group countries met over three days as part of a collective effort which brought together more than 200 people, including employees, students and clients, all with one common objective - **to innovate and transform the legal sector thanks to generative AI.** 

The teams worked on challenges such as making knowledge available to businesses and advisers, the revolution in legal writing and improving access to justice. Microsoft, as sponsor, added value by providing a cutting-edge AI environment allowing participants to take advantage of advanced capabilities to improve the Lefebvre Sarrut content.

# — 3.2.3.1.3. LightSpeed start-up accelerator

Building our innovative solutions also involves collaboration with our ecosystem.

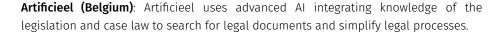
The LightSpeed accelerator provides support for **legaltechs** thanks to a **personalised programme that includes mentoring and the joint performance of POC implementation**. This might, for example, involve tests on the marketing launch of the start-up solution by the marketing and sales teams of our Group and its subsidiaries, or the creation of new services based on the combined expertise of the start-up and the Group, or the integration of new technologies into our subsidiaries' products.

This year, our priority is to develop solutions geared to environmental, social and governance issues, as well as generative artificial intelligence for the legal industry. We also want to propose legal solutions adapted to businesses' markets, covering such fields as human resources and compliance.



In 2023, eight start-ups joined this programme.

# ARTIFICIEEL





**AVA HR (France)**: AVA HR uses AI to help HR teams in their day-to-day tasks thanks to ready-to-use documents such as employment contracts, employee evaluations and skills assessments.



**diFacile (Italy)**: diFacile is an advanced legal technology platform which streamlines the recovery of unpaid extra-judicial and judicial costs thanks to digital automation.



**Govin (Netherlands)**: Govin offers venture capital companies, founders and members of the board of directors a solution for managing corporate governance effortlessly and transparently with user-friendly workflows and information that can be used for legal agreements.

# Renaiss

**Renaiss (Spain)**: Renaiss, powered by AI, uses internal data and documents to improve sales operations.



**Salacia (Netherlands)**: Salacia facilitates total ESG compliance thanks to its integrated SaaS platform which provides an entirely automated accounting system for ESG reports.



**Suzan AI (France)**: Suzan AI is an AI governance and security platform that allows for the monitoring of AI assets, risk management and systems alignment with global regulations and standards.



**Tucan (Germany)**: The AI-based Tucan software application provides automated summaries of meetings and texts, adapted to specific needs.

# 3.2.3.2. Actions linked to research and development

A European team dedicated to research and development and IT teams in each subsidiary daily explore the new technologies (machine learning, new artificial intelligence algorithms, etc.).

In total, we dedicated 288,865 hours to the development of innovation projects in 2023.

Among these projects, we would particularly highlight **the GenIA-L project, the first European generative AI solution to use reliable legal content**. Integrated into the NEO and QMemento databases in Spain, the GenIA-L solution will soon be deployed in other European countries.



Although generative AI technologies can write impressive texts that mimic human writing, the results may be inexact when they are based on incomplete, obsolete or unverified sources of information. To remedy these difficulties, our development team refined the search capabilities of our algorithms coupled with the top generative AI solutions (LLM, Large Language Model) and applied them exclusively to updated legal content from our verified sources. The result guarantees that users receive reliable and exact responses and information: a first for AI-based solutions in the legal sector.

In France, the GenIA-L **Smart BDESE** software application solution allows economic, social and environmental reports to be created with the help of generative AI. Thanks to this added GenIA-L functionality, clients now obtain automatic comments on the legal indicators present in their reports, thus offering time savings and increasing efficiency.

Also noteworthy is the launch, in Italy, of a free application, **App labour AI**, for all professionals, which allows them to exchange with an AI that has been developed to obtain relevant information on labour law and practical questions relating to recently updated regulations on fixed term employment contracts.

In addition, the Group R&D team launched a POC with a **demonstrator dedicated to the generation of legal texts using AI**. This POC allows the possibilities and use cases of this promising technology to be explored. The demonstrator is in Beta test phase and is being evaluated by a group of users in order to gather feedback for improvement.

Turning to training, we also innovate by using the neurosciences to encourage learning. For example, Lefebvre Dalloz offers a learning product in the form of a **pedagogical escape game** to teach legal and jurisprudential notions relating to gender-based violence and sexual harassment at work in an active and fun way.

All these actions illustrate our commitment to staying at the forefront of innovation in the legal sector. This ongoing commitment reflects our determination to respond to the changing needs of our clients and to change the way the law is practised.

Objectives	Indicators	Results	Progress	Remarks	2028 objectives
Spread the culture of innovation and maintain open and constructive relations with our entire ecosystem as a source of inspiration and innovative partnerships.	Number of innovation initiatives created internally or with the ecosystem*	24	1		Approximately thirty
Anticipate the future needs of our clients and make sure we have the skills needed to respond to them or the knowledge of the necessary technologies.	Number of hours dedicated to innovative projects (R&D + IT)	228,000 hours	12.	The Spanish tax credit for R&D having become more restrictive, only half of the hours spent in Spain in 2022 could be taken into account in 2023.	Growth or stability

# 3.3. Customer ESG engagement

# 3.3.1. CHALLENGES/RISKS

Our professional clients evolve in a complex legal and technical environment that is constantly changing, particularly in terms of compliance: personal data protection (GDPR), anti-corruption legislation and, more salient in recent times, environmental, social and governance (ESG) criteria or, more broadly, Corporate Social Responsibility (CSR). In this context, our ambition is to accompany our clients in monitoring and understanding these European and French developments.

The instability and the speed of changes in the legal framework in these emerging areas represents a major challenge for our Group and its subsidiaries, which must **respond rapidly to the needs of a developing market and propose tailored offers**, in particular allowing regulatory constraints to be transformed into opportunities for our clients.

Moreover, **compliance and particularly ESG** may be subjects for which the competence and excellence of our Group and its subsidiaries are not yet recognised by all our clients, no doubt with the exception of legal services and experts. We therefore need to rapidly develop our image as a risk management partner with the companies most concerned.

## 3.3.2. POLICY IMPLEMENTED AND OBJECTIVES

To meet these challenges and risks, we are determined to show that **the law and compliance must not be seen simply as constraints**, **but rather as an opportunities to create value** for our clients, particularly companies.

Our commitment to compliance is not limited to our clients but applies to our Group and its subsidiaries too. We must be exemplary in our own compliance, developing a true culture of compliance internally (see 6), thereby showing the way to our clients.

We are committed to remaining up-to-date in our knowledge and understanding of the latest legal changes and to putting them in perspective in relation to the businesses of our clients to help them find their way through this complex landscape.

We will work to convey our legitimacy to the market, communicating regularly about our know-how, our actions and our offers.

Our objectives		
Customer satisfaction	Increase customer satisfaction with all our products and take appropriate measures to increase brand loyalty and the visibility of our brands.	
Customer ESG engagement	Be the indisputable compliance and ESG partner for legal and accounting firms and professionals.	

#### 3.3.3. OUR ACTIONS AND RESULTS

Our mission consists in accompanying our clients in their understanding and rigorously compliance with the law and regulations. We are committed to providing them with the solutions and tools necessary for the effective application of these rules.

As part of our mission, we keep ourselves informed of any new standards and rules relating to compliance and CSR. Among these texts, the **Corporate Sustainability Reporting Directive** (CSRD) is of particular importance.

Aware as we are of the importance of the changes implied by the CSRD, our Group and its subsidiaries are fully committed to acting, clarifying and simplifying the procedures in collaboration with actors that support and promote business sustainability. With **Pascal Durand**, MEP and CSRD rapporteur to the European Parliament as the driving force, and with **EFRAG**, the **GRI and all the stakeholders involved**, including businesses, legal advisers and associations, we are actively involved in implementing this directive. Thus in November 2023, we took part in an initial workshop which brought together such key actors as EFRAG, the UN Global Compact and other companies. As a member of this collective commitment, the Group is determined to contribute its expertise and its resources to **support businesses in their transition towards greater sustainability**.



More broadly, we are committed to providing clear, practical solutions to help businesses understand and meet the requirements of the CSRD. Our objective is to facilitate the communication of information on sustainability and to promote transparency and environmental and social responsibility.

# 3.3.3.1. Development of a European ESG by Lefebvre Sarrut platform

In order to accompany our clients as effectively as possible in applying the CSRD, we have conducted in-depth studies throughout Europe. We attach great importance to listening to businesses and their legal advisers in order to propose solutions that meet their needs.

We strive to understand the CSRD from source, without waiting for local transpositions. Thanks to our Group's European dimension and the excellence of our experts and authors, both internal and external, we are in a position to review new laws and regulations as soon as they are published and to provide informed comments on them.

Our clients' first identified need is to know where to begin and how to organise themselves in order to apply the CSRD. In answer, we have developed the **ESG by Lefebvre Sarrut platform** to guide users step by step.

The ESG by Lefebvre Sarrut platform provides detailed explanations on the CSRD, its spirit and the various steps to be followed, in particular consultation of stakeholders, production of a double materiality matrix, etc. It also contains models to be completed for each step of the process. This platform allows the **entire CSRD workflow to be followed** and provides functionalities such as alerts, reminders and a dashboard, thus facilitating and tying down the implementation of the CSRD.

As well as being an onboarding tool for the CSRD, our platform responds to the needs for information, training and production by proposing news items, training programmes and implementation tools.

In particular, this platform contains a **knowledge base** module which brings together practical fact-sheets presenting each preparatory step for the sustainability reporting required under the CSRD. These fact-sheets aid understanding and implementation of the CSRD and the associated ESRS, with clear examples, check lists and links to the official texts and to tools.

Launched in the Netherlands in mid-2023, the ESG by Lefebvre Sarrut platform is in the process of being deployed in the other countries where the Group is present.

This platform is scalable and will be adapted depending on the specific needs conveyed by our clients.



An additional tool, the **E-data module**, also developed in the Netherlands, gives businesses a detailed statement of the environmental impact of their products and allows avenues for improvement to be identified. This tool calculates in real time the environmental costs of the company's products, using reliable, scientifically supported product data from the Dutch Idemat database. If there are any changes in these data, for example the use of a less sustainable source of energy, the E-data user receives a notification. This allows the user to take informed decisions on the future choice of processes and products, by visualising how these choices will affect environmental impacts.

As trusted partners, we are determined to accompany our clients in their transition to a more sustainable economy and to help them attain their ESG objectives.

# 3.3.3.2. Training programmes to understand ESG and take action

In parallel with the ESG by Lefebvre Sarrut platform, we also run webinars and training sessions on ESG and more broadly compliance.

In France, Lefebvre Dalloz has established a **partnership with the ESCP Business School for the launch of the "RSE: comprendre pour agir"** (CSR: understand in order to act) certificate. This programme aims to strengthen the skills of managers and professionals in the field of CSR.

In 2023, the Lefebvre Dalloz training division ran some **thirty ESG training modules**. These training programmes address such subjects as the approach to CSR, the ISO 26000 standard, the circular economy in business, sustainable finance, etc. They are aimed at different corporate functions, notably ESG, HR and finance managers, as well as all employees thanks to workshops like the Climate Fresk.

The same approach was taken in the Netherlands, where **Sdu produced more than 20 training modules**, ranging from short awareness-raising sessions to training programmes providing certificates such as that on **Certified ESG Management, in partnership with Curae Futurum**.

**Free webinars** are also held in the various countries where the Group is present, to raise businesses' awareness of the ESG stakes at play, such as in Belgium with the training session entitled "Key concepts and stakes of CSR. For whom? Why? For when?" in December 2023.

In Spain, we launched a series of **ESG Talks** webinars in 2023, and these will continue in 2024. These free sessions allow participants to gradually build their ESG skills and prepare for the new reporting obligations of the CSRD.

We are thus committed to providing our clients with the knowledge and skills necessary to act responsibly and in compliance with ESG standards and regulations. Our range of training programmes and our partnerships reflect our determination to support our clients in their approaches to sustainable development and societal responsibility.

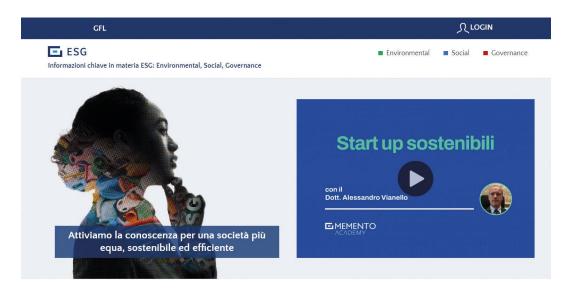


## 3.3.3.3. Editorial content to boost compliance

For many years now, we have helped businesses increase their degree of compliance in terms of the environment, health and safety as well as labour law and compliance in general, for example with the **Elnet, actuEL and Smart action** ranges in France.

In 2023, we developed new editorial content dedicated to compliance and/or ESG in all the countries where the Group is present.

In each country, **online ESG hubs** have been put in place to help businesses locally to apply regulations. These hubs offer pedagogical content, monthly updates, in-depth information and white papers.

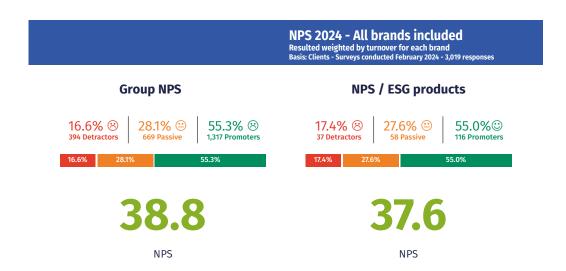


In addition, **topical ESG threads** were launched, for example in Italy on the **QuotidianoPiù** website and in France on the **Open Lefebvre Dalloz** website. The **Vigilance** podcast published on the latter presents studies, guidelines and useful tools for the daily application of ESG principles.

In Belgium, **Comprendre la RSE, Levier de transformation durable** (Understanding CSR, a Lever for Sustainable Transformation) published by Larcier-Intersentia, is a reference on the subject, as is **Sustainability, Businesses and Stakeholders**, published by Giuffrè Francis Lefebvre in Italy.

In Spain, the **Sustainability Mémento** was published in collaboration with the General Council of Economists of Spain. This work allows professionals to acquire the necessary knowledge and skills as regards the regulations in force and the new European Sustainability Reporting Standards (ESRS). It also provides the necessary information to draw up a statement on extra-financial performance or a sustainability report, as well as the basic knowledge required to verify them. The main objectives of this document are to facilitate compliance and to manage the risks associated with sustainability. The **Corporate Governance Mémento** details and analyses the obligatory regulations in force in Spain, and presents the recommendations for good corporate governance while the **Mémento on Protection of Data and Digital Rights** provides businesses and their advisers with a brief, direct and instructive consultation reference on all regulations relating to the protection of data and the safeguarding of digital rights.

Lastly, **Compliance Normativa**, the new solution from Giuffrè Francis Lefebvre's (GFL), provides a constant watch on changes in regulations, practices and case law. It contains interpretations and in-depth studies by GFL's experts aimed at managing the impacts on business processes and the associated risks.



In 2023, the client NPS stood at 38.8 points (up by 3.7 points) and the client NPS for our ESG offerings stood at 37.6 points (up by 12.7 points).

At present, revenues generated by our ESG offerings represent 3.5% of our turnover. Revenues generated by these offerings were up by 22% on the previous year.

Objectives	Indicators	Results	Progress	Remarks	2028 objectives
Increase customer satisfaction with all our products and take appropriate measures to increase brand loyalty and the visibility of our brands.	Client NPS*	38.8	-		Positive
Be the indisputable compliance	Client NPS on our ESG and compliance solutions	37.6			Positive
and ESG partner for legal and accounting firms and professionals.	Percentage of revenues generated by ESG and compliance offers	3.5%	1		5 to 10%

# 4. Environment: contributing to a more sustainable world

# 4.1. Challenges/risks

**GHG emissions** linked to economic activities are a major source of climate disruption, with the potential to greatly increase instances of droughts, wildfires, storms, floods, food scarcity, loss of biodiversity, etc., with terrible consequences for human populations. Our Group and its subsidiaries are fully committed to the collective effort to reduce world CO<sub>2</sub> emissions, by acting wherever they can to limit their direct and indirect carbon production.

At present, a very large part of our CO<sub>2</sub> emissions is indirect, caused by the activity of our suppliers. More specifically, according to our carbon assessment, our Scope 3 emissions represent 97% of our total emissions – theoretical calculation. Our challenge is therefore first to draw up a more precise assessment and to consequently improve the footprint of our supply chain while also having no direct control over it.

Furthermore, since **energy** (electricity) is the main factor contributing to climate change (25% globally) given that the vast majority is still produced from fossil fuel, it is important to control our use and consumption.

Lastly, we recognise the risks associated with the **degradation of natural ecosystems** such as deforestation and carbon sink depletion. It is vital that we take measures to prevent the degradation of natural ecosystems and to protect the forests. The forests contain much of our planet's biodiversity, home to more than 80% of animal, plant and insect species. The preservation of these habitats is crucial to maintaining ecological equilibrium and biological diversity.

Furthermore, we are engaged in economic activities for which we are particularly dependant on paper, energy and IT equipment for both the production of and access to our solutions and services. Shortages or scarcity of these resources would have a negative impact on our production capabilities.

Like us, our clients are increasingly sensitive to the environmental commitments of their suppliers. If we fail to meet their requirements, we risk losing markets and clients alike.

This could affect the very survival of our Group and its subsidiaries in the long term.

# 4.2. Policy implemented and objectives

We are aware of our environmental responsibility. One of the commitments deriving from our mission statement is to **contribute to building a sustainable world**. We are thus committed to preserving the environment in cooperation with all our stakeholders and to integrating sustainable practices into all our activities.

**Environmental responsibility is not just individual, it is also collective**. That is why our Group evaluates and reduces the impact of its direct activities and works closely with the partners in its ecosystem - particularly its suppliers - to improve the footprint of the products and services of our Group and its subsidiaries throughout their life cycle.

We also offer products and solutions to help our clients understand their own environmental impact and implement their action plans. We encourage and train our teams to take account of the environment in all our company's activities.

The purpose of our environmental policy is to define the framework and the strategic pathways to guide our action plans. It aims to **mitigate the effects of climate change**, in particular by reducing our carbon footprint both in our direct activities and all along our value chain, to **act on pollution and on the waste** generated by our activity, to preserve biodiversity and to manage natural resources effectively.



## Mitigating climate change

We are committed to contributing to the mitigation of climate change by reducing our GHG emissions and favouring environmentally responsible practices:

- **Responsible production**. We focus on alternative proposals to the consumption of paper by promoting less energy-intensive digital solutions. We favour the rational, systematic use of duly labelled paper from sustainable sources. We also evaluate the practices of our suppliers and partners to make sure that they comply with high environmental standards and we encourage them to develop good environmental policies.
- Logistics, transport and travel. We optimise our logistics and transport operations, taking care to limit the GHG emissions associated with the distribution of our products. We promote the use of low-emission means of transport and encourage sustainable transport practices. For example, we encourage sustainable mobility practices among our employees, particularly the use of public transport and home office working. We seek to give priority to trains for business travel or the use of online communication solutions.
- Management of premises. Over the past few years, the Group has undertaken a major overhaul of its establishments at its various sites throughout Europe. The new premises comply with stringent environmental requirements, in particular by favouring energy efficiency and the use of energy from renewable sources in certain cases. This includes the use of energy-saving technologies and equipment, continuous and collective monitoring of our energy consumption in particular, and the introduction of waste reduction measures.
- **Digital technology**. We give priority to digital solutions that respect the environment by minimising energy consumption and optimising the use of IT resources. We also encourage appropriate recycling of end-of-life electronic equipment or the use of easily repairable or reconditioned materials when this is operationally possible.



## Pollution and waste management

We are determined to manage our resources responsibly and to reduce our impact on ecosystems. Our efforts to manage resources and waste encompass the following:

- **Eco-design and product life-cycle**. We aim to optimise the life-cycle of our physical and digital products by favouring eco-design and the circular economy. For example, by adjusting print runs to actual needs, reducing packaging, using plastic, and by promoting sustainability and recycling of the products that we offer.
- Responsible communication and marketing actions. We adopt a reasoned approach in our marketing and communication actions, taking account of our clients' and prospects' interests and limiting the use of non-recyclable promotional items.
- Waste sorting and recycling. An effective waste sorting system is in place at our premises, favouring recycling and the re-use of materials wherever possible. We work together with waste management service providers who respect the environment.



#### Preservation of biodiversity and management of resources

We take care to preserve biodiversity and manage natural resources effectively, adopting the following measures:

- **Procurement of raw materials**. The majority of the paper we use comes from certified renewable forests. We review our mode of production, systematically giving preference to the solutions that are best for the environment.
- **Sustainable purchasing policy**. We are drawing up an ambitious purchasing policy which incorporates environmental criteria, favouring suppliers who meet high environmental standards.

Our Group is committed to acting directly on the mitigation of climate change, pollution and waste management, the preservation of biodiversity and the management of natural resources. We accompany our partners, suppliers and employees in reducing their GHG emissions, and we communicate regularly on environmental issues, both internally and externally.

Our objectives				
Mitigating climate change Control and reduce our CO <sub>2</sub> emissions in collaboration with our suppliers.				
Adaptation to climate change Control and reduce our energy consumption.				
Biodiversity and resource management	Reduce the impacts of our paper production on biodiversity and optimise the management of resources.			

# 4.3. Our actions and results

#### 4.3.1. MITIGATING CLIMATE CHANGE

GHG emissions linked to economic activities constitute a major source of climate disruption. Our Group and its subsidiaries are fully committed to the collective effort to reduce world  $CO_2$  emissions, by acting wherever they can to limit their direct and indirect carbon production.

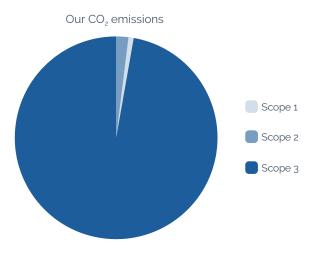
In 2022, we carried out our first carbon assessment for our Group and its subsidiaries.

	Group total in metric tons of CO <sub>2</sub> equivalent	Breakdown
Scope 1	832.4	2%
Scope 2	507.7	1%
Scope 3	41,008.9	97%

The items relating to transport are broken down as follows.

	Group total in metric tons of CO <sub>2</sub> equivalent	% of the assessment total
Transport of merchandise	460.5	1%
Fuel	760.0	2%
Business travel	455.7	1%
Commuting	1,984.9	5%

# 4.3.1.1. Indispensable collaboration with our suppliers



A very large part of our CO<sub>2</sub> emissions is indirect, caused by the activity of our suppliers. More specifically, according to our carbon assessment, **our Scope 3 emissions represent 97% of our total emissions** – theoretical calculation. Our challenge is to improve the footprint of our supply chain even though while having no direct control over this.

30% of the data covered in the assessment are from our actual, specific activities (e.g., energy bills and invoices for transport actually used by employees on their work trips). In the absence of available data, the remaining 70% correspond to financial estimations based on expenditure and average CO<sub>2</sub> emissions of ADEME (Environment and Energy Management Agency). According to Bartle, the firm that carried out the work, the ratio is not surprising for a first assessment, but the

results must therefore be interpreted with caution. One certainty: 85% of these financial ratios are linked to our suppliers, whose carbon footprint we do not yet know.

Our first lever, both to better measure and to reduce our indirect footprint, is therefore to ask our major suppliers to send us their carbon assessment. Which is what we did in 2023. We launched a major campaign with our suppliers to ask them to provide us with their carbon assessment or, failing that, information on their environmental footprint.

#### We asked 91% of our major suppliers to provide us with their carbon assessment.

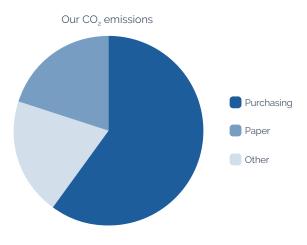
As regards paper suppliers, we also made an inventory of the types of paper and quantities used in order to determine which type(s) of paper to favour in order to reduce our CO<sub>2</sub> emissions.

# 4.3.1.2. Our plan to reduce emissions

Based on the results of the carbon assessment, we identified two key areas on which we will concentrate our efforts to reduce emissions:

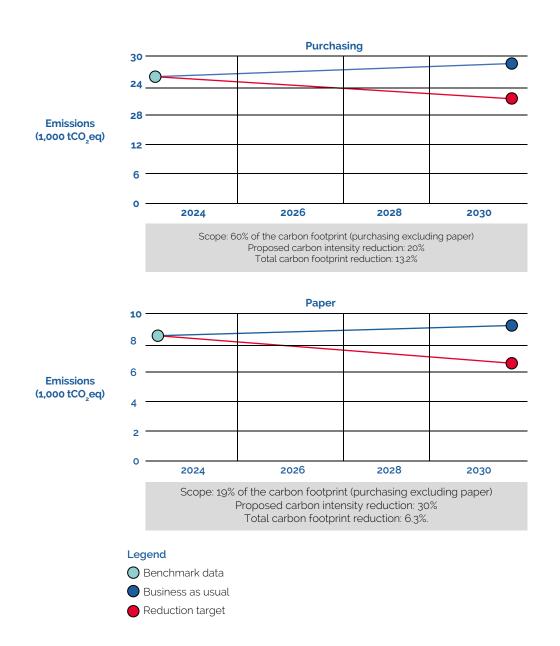
- purchasing, which accounts for approximately 60% of our carbon footprint;
- paper, which represents 20% of our carbon footprint.

In 2023, our priority was to obtain more detailed data than those collected as part of the first carbon assessment. To do this, we undertook actions included in-depth data analysis, the definition of specific categories and collection of additional internal and external data. Once these data have been detailed and properly understood, we shall be in a position to define an ambitious but realistic and consistent trajectory to reduce our emissions.



Additional measures will be studied for **transport and travel** (ICE vehicles account for 1.8% of the carbon assessment total) and **commuting** (which accounts for 4.7% of the carbon assessment total, likely to increase in 2024 given the numerous moves and the generalisation of hybrid working).

The next carbon assessment, scheduled for 2024, will be of capital importance for the fine-tuning and adjustment of our plan, allowing us to take informed decisions in order to attain our emission reduction objectives. Our Group and its subsidiaries are resolutely determined to play an active role in the transition to a more sustainable economy.



## 4.3.2. ADAPTATION TO CLIMATE CHANGE

At world level, energy, particularly electricity, plays a crucial role in climate change in view of its significant contribution to GHG emissions. Indeed, some 25% of world CO<sub>2</sub> emissions are attributed to the production of electricity, mainly from fossil energy sources such as coal and natural gas. Faced with this reality, it is imperative that we collectively control our use and consumption of energy.

As regards the activities of our Group and its subsidiaries, controlling our use of electricity implies responsible management of our consumption. This can be achieved by adopting environmentally responsible conduct such as the use of energy-efficient apparatus, turning off lights and electrical appliances when not in use, regulating the temperature in our workspaces and raising awareness of the importance of energy efficiency.

By controlling our use and our consumption of electricity, we contribute to reducing our carbon footprint and to proactively combating climate change. This allows us to play an active role in the transition to more sustainable energy systems, while at the same time preserving our planet for future generations.

Over the course of 2022 and 2023, our teams in France, Belgium (for the teams based near Antwerp), Italy and Germany moved into **new premises with environmental labels.** These new facilities are equipped with **building management systems** that aim to reduce energy consumption, particularly as regards lighting. For example, in the Lefebvre Dalloz tower in Paris La Défense, the lights are turned off from 9:30 pm to 6:00 am on weekdays and throughout the weekend. Similar measures have been taken in Spain.





The same approach was adopted to reduce the energy consumption of the heating, ventilation and air conditioning (HVAC) systems, particularly in the new premises in France and Italy. In the Netherlands, measures were put in place to reduce the temperature to which the building was heated, thus contributing to a reduction in energy consumption.

We have also started to routinely close off **certain floors of our buildings during slack periods**, such as the traditional holiday periods. For example in Spain, we neutralised two floors in July and August 2023 to optimise the use of the offices and reduce energy consumption. The estimated energy savings from this measure are equivalent to the volume of CO<sub>2</sub> transformed into oxygen by 54 trees in one year.

In parallel, actions are being undertaken to **reduce the energy consumption of our IT infrastructure**. For example, in France we have included in our IT service provision contracts a clause relating to the monitoring and control of consumption.

#### Overall in 2023, our consumption of electricity amounted to 2,229,603 KWh and that of gas to 524,484 KWh.

Once our 2024 carbon assessment has been completed, we will precisely quantify our objectives for reducing the consumption of electricity and gas.

These various initiatives attest to our commitment to reducing our environmental footprint and adopting more energy-efficient practices. We will continue to explore new opportunities for improving our efficiency in 2024.

## 4.3.3. BIODIVERSITY AND RESOURCE MANAGEMENT

# 4.3.3.1. Towards a reduction of our paper impact





Our paper production activity, encompassing the manufacture of books, magazines and marketing and pedagogical documents, has a significant impact on our environmental footprint. To reduce this impact, we are committed to increasing the **proportion of paper originating from sustainably managed forests**, certified by labels such as PEFC or FSC, in our overall consumption.

In 2023, we attained a figure of 79% of paper from sustainable sources, and we aim to exceed 90% in the next five years. In France and Spain, this percentage is over 99.

Apart from this, we also launched a campaign with our paper suppliers to make an inventory of the types of paper used and **analyse which type of paper should be given preference** by the Group.

In parallel, we continue to favour **certified printers**, which guarantees environmentally friendly practices in all the countries where the Group operates. For example, of the 31 French providers, 28 hold at least one certification and the majority hold more than three. This approach allows us to work with partners who share our commitment to sustainability.

Whenever possible, we also reduce the volume of paper used for our works and publications. For example in Italy, the page gauges have been reviewed for the majority of our books, allowing us to print more text per page and therefore reduce the quantity of paper. The grammage of the paper for the legal review Mémentos has also been reduced.

Thus in 2023, we used a total of 3,717.45 metric tons of paper as against 4,187.40 metric tons in 2022, a **reduction of 11.22%** in our paper use.



In France, our Group has joined Citéo, a State-approved environmental body. Joining Citéo allows us to fulfil our obligation of extended producer responsibility and to participate actively in the **circular economy of the paper sector**. We implement recycling and responsible waste management practices, thus contributing to the reduction of our environmental footprint.

With a contribution of €33,337 for the 2022 marketing launches, we financed the collection of paper from 32,400 inhabitants, allowing 389 metric tons of paper to be recycled. This contribution has multiple effects on the paper sector:

- in particular, it promotes recycling by providing financial support;
- it favours eco-design, since it acts as a financial incentive for producers: the more the product is eco-designed, the more the environmental charge is reduced.

To facilitate the recycling of our works, we have also eliminated **plastic** from our covers, as in Italy and Spain where the cover of the Mémento review is now 100% paper.

In Belgium, we have asked our suppliers to introduce us to their recyclers when the works are shredded. In parallel, we are currently looking at expanding **printing on demand**, to limit surplus printing. Thanks to our new KNK back-office system, a new form of cooperation between the various internal departments (publishers/production) will be put in place to refine the initial print runs of works and reduce the quantities of paper and ink used.

Overall, in the Group as a whole, we ask our employees to **limit the number of print-outs** and we have reduced the number of printers on our premises. For example, in 2023 in Italy, the writers substantially reduced the number of print-outs of drafts for proofreading.

These actions attest to our determination to promote the responsible use of natural resources, in particular by favouring paper originating from sustainable sources. We will continue to work in close collaboration with our partners and to explore new initiatives for strengthening our commitment to environmental sustainability in our sector of activity.

## 4.3.3.2. Towards more sustainable IT

We strive to improve our environmental impact linked to IT by putting various initiatives in place. Below are some examples of actions undertaken in 2023.



In our Spanish subsidiary, we opted to **replace the IT hardware, favouring laptops over desktop PCs**. This decision allows us to extend the useful life of the equipment from four years to six. As well as reducing electronic waste, this also contributes to more efficient energy consumption, since laptops are more energy-efficient than desktop PCs. This global approach is deployed in all the countries in which the Group operates.

In Belgium and Luxembourg, we have put in place a monitoring system for our servers. This allows us to keep a close watch on their energy consumption and to adjust the servers made available by our providers depending on actual storage capacity requirements. By optimising

the use of the servers and avoiding unnecessary over-capacity, we reduce our energy consumption and minimise our environmental impact.

Lastly, **Green IT training programmes** took place in France to raise our employees' awareness of sustainable IT. These training programmes provide them with knowledge and good practices for reducing the environmental impact of their daily use of IT. Following these training programmes is a condition for benefiting from our incentive programme.

By incorporating these sustainable development initiatives into our incentive policy, we reinforce our employees' commitment to reducing our IT-related environmental footprint.

## 4.3.4. RAISING EMPLOYEE AWARENESS AND REDUCING INDIVIDUAL IMPACT

Even though our direct emissions account for only 3% of our carbon assessment, we have implemented multiple actions to encourage employees to reduce their individual carbon footprint in all subsidiaries in Europe.

For example: in France, a **sustainable mobility allowance** has been put in place. Employees can choose between a maintenance credit for the on-site repair of a bicycle or scooter and a credit for safety equipment, or payment of Vélib trips, a bicycle service in Paris (with a ceiling of €100). At the Lefebvre Dalloz site in La Défense, 18 charging stations (including one for persons with reduced mobility) are available for employees to recharge their EV at cost price.

The **sorting of waste** has been systematised in all countries where the Group has its activities. Selective sorting bins are available on our premises, allowing employees to separate recyclable waste such as paper, plastic, glass and food waste. We encourage all employees to participate actively in these initiatives.



We also promote non-profit actions in favour of sorting and recycling such as that in Spain through our partnership with the **Fundación Llamada Solidaria** which advocates for solidarity recycling of unused electronic appliances collected from our Madrid premises. Similarly in Italy, to **promote circularity**, we organised an auction of furniture that we no longer used following our move, for charity associations.

We are determined to continue our efforts to minimise our environmental footprint and to preserve fragile ecosystems. By adopting concrete measures, raising our employees' awareness and collaborating with our partners, we contribute to the construction of a more sustainable future for our planet.

Objectives	Indicators	Results	Progress	Remarks	2028 objectives
	% of our major suppliers who have been asked to provide a carbon assessment*	91%	No prior data		Close to 100%
Control and reduce	Scope 1 carbon assessment	832.4 tCO <sub>2</sub>			Lower*
our CO <sub>2</sub> emissions in collaboration with our suppliers.	Scope 2 carbon assessment	507.7 tCO <sub>2</sub>	No prior data	Next carbon assessment in 2024. This assessment will allow us to adjust our objectives and our transition plan.	Lower*
	Scope 3 carbon assessment	41,008.9 tCO <sub>2</sub>			Lower*
	Percentage of the carbon assessment calculated (as opposed to inferred from financial data)	30%			Close to 100%

Objectives	Indicators	Results	Progress	Remarks	2028 objectives
Control and reduce our	Electricity consumption of buildings	2,229,603 KWh	No prior data		Lower*
energy consumption.	Gas consumption of buildings	524,484 KWh	No prior data	In France, Spain and Italy, the buildings no longer consume gas.	Lower*
Reduce the impacts of our paper production on biodiversity and optimise the management of resources.	Percentage of PEFC or FSC paper in overall consumption	79%		In France and Spain the percentage is above 99.	More than 90%

<sup>(\*)</sup> To be quantified after our 2024 carbon assessment.

# 5. Social: providing an inspiring work environment

# 5.1. Challenges/risks

In a context of profound changes in the world of work, human challenges remain our priority and are central to the preoccupations of the Group and its subsidiaries. Our objective is to **strengthen our commitment to our employees by offering them a clear mission, the tools and the environment to achieve it effectively as well as an enriching experience.** 

To do this, we must first be sure to put in place good **working conditions**. Not only do we take part in creating decent employment contributing to increased employee well-being and standard of living but we also ensure that employees have good conditions in which to perform their functions and reasonable working hours. These elements favour work/life balance and have a positive effect on employees' friends and families. We must also combat possible gender disparities (unequal salaries and/or career opportunities, persistent gender stereotypes and other forms of gender-based discrimination).

Secondly, as regards **training and skills development**, it is essential to contribute to improving employees' employability by means of career management and skills development depending on sectoral transformations so that they can be actors equipped to contribute to a fairer society.

Lastly, **diversity and inclusion** must be two of the Group's priorities, not just when it comes to combating the lack of opportunities of populations at risk due to their age (particularly young people), their gender, their disability, ethnicity, origins, religion or economic status, but also to combat the risk to the organisation of potentially losing talented employees.

# 5.2. Policies implemented and objectives

Based on respect for stakeholders and their fundamental rights, our Group and its subsidiaries are committed to placing humans at the centre of their culture. We strive to create an inspiring work environment for our employees by proposing motivating projects and innovative and collaborative ways of working that favour their professional and personal development.

This commitment is based on the following principles:

- **Innovation**. We favour agile and collaborative working environments in which knowledge is shared, which favours the generation of new and creative ideas that stimulate growth and continuous improvement within our Group.
- **Professional development**. We are committed to developing individuals and teams. To this end, we favour a culture of learning through development plans to acquire the necessary skills and knowledge that will lead us to excellence in our activity.

- Performance evaluation. We regularly evaluate performance in order to provide constructive feedback, establish
  clear objectives for professional development, identify areas for improvement and recognise good individual and
  collective performance. These evaluations are carried out on the basis of proximity between employees and their
  managers.
- **Diversity, equal opportunities and non-discrimination**. We promote diversity and equal opportunities. We ensure fair, non-discriminatory treatment of all employees, irrespective of their origin, religion, gender, sexual orientation, disability, age or any other characteristic. We will not tolerate any form of bullying, harassment or discrimination in our Group.
- Equal opportunities and non-discrimination. We promote equal opportunities and ensure fair, non-discriminatory treatment of all employees, irrespective of their race, colour, religion, gender, sexual orientation, disability, age or any other characteristic. We will not tolerate any form of bullying, harassment or discrimination in our Group.
- **Remuneration and benefits**. We offer fair and competitive remuneration and complementary benefits based on the responsibilities, performance and contribution of each person.
- · Safe working environment. We promote safe, healthy workplaces that favour people's general well-being.
- **Regulatory compliance**. We are committed to respecting the social, tax and occupational risk prevention regulations governing labour relations in each country in which the Group is present.

Each year, we evaluate our social performance and employee satisfaction by means of the **annual HappyAtWork survey**, carried out by the independent body ChooseMyCompany. This initiative enables us to measure our results, our progress and our social impacts. The results of this survey are carefully analysed and allow us to understand the strengths and weaknesses of our working environment, to identify priority actions and to put in place concrete plans for improvement.

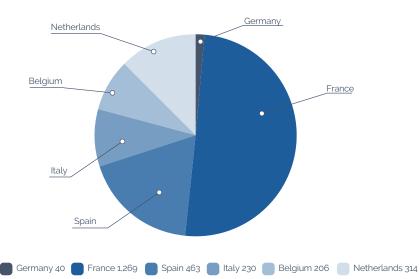
Our objectives			
Working conditions	Increase employee well-being and satisfaction. Guarantee good working conditions, in particular with the spread of hybrid working. Provide an inspiring work environment and propose innovative projects. Ensure a work/life balance. Ensure a gender balance.		
Training and skills development	Contribute to improving employees' employability by means of career management and skills development depending on sectoral transformations.		
Diversity and inclusion	Help integrate everyone through economic activity, regardless of their age, gender, disability, race, ethnicity, origins, religion or economic or other status.		

# 5.3. Our actions and results

## **5.3.1. WORKING CONDITIONS**

We believe that good working conditions are essential both for our business and for employees. They favour better fulfilment of professional potential, increased productivity and reduced absenteeism, while at the same time making the company more attractive as an employer and earning the loyalty of talented employees. Their impact on the company's reputation is real, as is the reduction in inequalities or the strengthening of social cohesion. Good working conditions are beneficial for all. They contribute to the success of businesses and underpin the construction of a more equitable and prosperous society.

In all the countries where the Group is present, we respect the rules relating to fundamental rights, working conditions, employees' health and safety, social dialogue, career management, child labour, forced labour, diversity, equity and inclusion. Beyond this regulatory compliance, we work with the social partners of each entity to continually improve working conditions and in particular employee well-being at work and standard of living (see 5.3.1.1). We are also keen to cultivate an innovative working environment (see 5.2.1.2).



Breakdown of workforce by subsidiary

# — 5.3.1.1. A healthy and safe workplace

#### — 5.3.1.1.1. Employee satisfaction and well-being

The employee experience is one of our priorities, and we believe that the voice of our employees should be taken into account when evaluating working conditions in the broad sense.

This is why we invite all our employees in Europe to take part in a **"HappyAtWork" survey** conducted by the independent firm ChooseMyCompany.

This survey measures the level of satisfaction and well-being of employees within their company. It aims to evaluate various aspects linked to the well-being of workers, such as recognition, work/life balance, atmosphere at work, opportunities for professional development, internal communication and career management.

The survey allows employees to give their opinions anonymously on these various aspects, and to provide evaluations and comments on their experience within the company. The results of the survey are then compiled and analysed in order to provide the various Group entities with information and indicators on their levels of satisfaction at work. The leading indicator of this survey is the Net Promoter Score (NPS).

In 2023, our Group obtained the HappyIndexAtWork and HybridWorkplace certification labels.



The <u>overall NPS for the Group was -3</u>, 37 points up on 2022. Our five-year objective is to turn this indicator positive. The rate of participation was also up sharply in 2023, reaching 73.5% as against 64.8% in 2022. Our goal is to maintain the participation rate above 65%.

These results demonstrate our progress, although much remains to be done. Each HR department analyses these results and puts in place an action plan adapted locally to each situation.

#### — 5.3.1.1.2. Guarantees of good working conditions

#### —— 5.3.1.1.2.1. Remuneration and complementary benefits

Compliance with **social, tax and occupational risk prevention regulations** is an absolute priority for our Group, regardless of the country in which we operate. We are firmly committed to respecting these regulations in order to guarantee ethical, transparent commercial practices that comply with the laws in force, and to going beyond the minimal obligations to promote the development of individuals and of the business.

As regards **remuneration and complementary benefits**, we are determined to provide our employees with equitable and competitive conditions. Our approach is based on the principles of justice and competitiveness in the remuneration of the talented people who contribute to our activities. In France, notably, in the context of the annual negotiated agreements, we have committed to paying all employees remuneration (including both fixed and variable) of more than 1.5 times the legal minimum wage (SMIC).

In parallel with this remuneration, we also offer complementary benefits that are both equitable and competitive. These benefits may include insurance schemes, pension plans, opportunities for professional development, compensation for work-related expenses, extra days of leave relative to the CLA, and other social benefits aimed at improving our employees' well-being and quality of life.

#### — 5.3.1.1.2.2. Sharing of value and commitment



The Group attaches great importance to the sharing of value with its employees, regarding it as an essential lever for encouraging employee motivation and commitment. In several subsidiaries, an **incentive scheme** has been put in place in order to allow employees to share in the results of the business. This scheme is based on a system of redistribution of profits, based in turn on pre-determined transparent criteria.

With the support of our family shareholders, an **employee shareholding campaign** was launched in France, Germany, the Netherlands, Belgium and Spain, offering employees the possibility of becoming shareholders of the Group by investing in the business to benefit from its growth and success. This campaign is accompanied by a contribution

from the business to increase the impact and the attractiveness for employees of the country concerned.

In this way, we recognise the importance of showing our appreciation to employees by allowing them to actively participate in the creation of value and by reinforcing their commitment to the company. This scheme aims to reinforce a feeling of belonging among Group employees, to promote an inclusive business culture and to create solid and lasting relations with the company's employees, favouring a real partnership among all the actors in the company.

#### —— 5.3.1.1.2.3. Hybrid working

Hybrid working, combining work in the office and remote working, is a practice we have introduced and made available within **all the entities of our Group**. We recognise that the advantages of hybrid working are numerous; it offers greater flexibility to employees while favouring work/life balance, not to mention the positive impact on the environment.

However, it is worth noting that hybrid working conditions can vary from one country to another, depending on local regulations, employee preferences and the specific needs of each entity, and indeed depending on the time of year. For example, we trialled a 100% remote working system on a voluntary basis in Spain between 17 July and 1 September in view of the climatic conditions coinciding with the traditional annual holiday period.

We also cover part of the expenses of our home-based employees, as is the case in Spain, and/or allow employees to equip themselves with a teleworking pack (comprising a screen, a mouse, a keyboard and a chair), as is the case in Belgium, Luxembourg and France.

We are attentive to the health of home office workers and to the prevention of risks. For example, at the end of 2023, we launched an evaluation questionnaire for Spanish employees with a guide to associated good practices.



In recognition of our efforts to promote fulfilling working practices adapted to the changing ways of working, our Group was certified with the **HybridWorkplace** label by the independent firm ChooseMyCompany in 2023. This certification attests to our commitment to the well-being of our employees and to our ability to create a harmonious working environment in which employees can develop and reach their full potential, whether by working in the office or remotely.

We consider these certifications as recognition of our constant efforts to establish a positive and inclusive working culture. They strengthen our determination to continue our actions in favour of an exemplary hybrid working environment in which employees feel appreciated,

supported and motivated to give of their best, wherever they carry out their professional activities.

#### —— 5.3.1.1.2.4. Health, safety and quality of life at work

Health, safety and quality of life at work are essential priorities for our Group, since we recognise their importance in favouring our employees' development and performance. Beyond the specific documents that exist in the various countries in which the Group operates (such as the single evaluation document for occupational risks in France) and the preventive measures put in place in each entity, below are some actions taken in 2023 which attest to our determination to act in these fields.

In France, we recently recruited a **nurse** at the Paris La Défense site, providing a regular on-site presence and health advice, administering first aid if necessary, giving (optional) vaccinations against flu and COVID, and raising employees' awareness of good health and safety practices. In Spain, a doctor is present on the premises several days a week and available on the other days for telephone consultation.

In Spain, we have put in place an **employee first aid training programme**, enabling our employees to acquire the skills needed to react appropriately in the event of an emergency in the workplace. This initiative aims to strengthen employees' safety and give them the necessary knowledge to be able to intervene in the event of injury or emergency.

The **prevention of psycho-social risks** is also a major concern for us. We have put specific measures in place in this area, in particular through the implementation of awareness-raising, training and monitoring actions to prevent and manage psycho-social risks. We pay particular attention to the factors of stress at work, to the workload, to work/life balance, and to the psychological and emotional support of our employees.

In Belgium and Luxembourg, we propose an **Employee Assistance Programme**, a confidential, free service offering psychological and social support to employees faced with difficulties, be they personal, work-related or family. This programme aims to contribute additional support for employees in facing the challenges of life and improving their overall well-being. This service also exists in France under the name **Programme d'Aide aux Employés**.

In France, we have also created a **new community of specialists on the quality of life at work** (QLWC). This community brings together employees from different departments and hierarchical levels to reflect together on initiatives aimed at improving quality of life at work (life-saving skills, posture, diet and sleep, rest spaces, etc.).

In the Netherlands, activities were regularly proposed at lunchtime to **promote moments of relaxation** in the middle of the working day and strengthen ties between colleagues: chair yoga sessions, walks to discover urban bird life, bicycle rides, classical music concerts and games of padel.





These initiatives demonstrate our commitment to our employees' health and safety and the quality of life at work. We seek to create a favourable working environment in which employees' mental and physical health is taken into account, in order to favour their professional development and their engagement within our company.

#### 

In the context of our efforts to promote a respectful and inclusive working environment, the prevention of and protection from harassment and discriminatory practices are undeniable priorities for our Group. We have put strict measures in place aimed at ensuring our employees' protection from harassment and discrimination, the reference document being the **Group Ethics Charter**.

We also make sure our employees are aware of their rights and responsibilities in order to prevent these undesirable situations. For example, in Spain, we have put in place **specific measures to prevent harassment**. Training programmes have been organised to raise all employees' awareness of the various types of harassment and how to prevent harassment, placing the accent on raising awareness of the warning signs, the creation of a respectful working environment and the role of each individual in the prevention of harassment. In France, each entity has two **specialists in combating sexual harassment and sexist behaviour**, one appointed by the company and the other by the works council.

To facilitate communication and reporting of cases of bullying or discrimination, we have put in place a **confidential reporting platform**, which is in the process of being deployed in all the Group's countries. This allows employees to report any situation of bullying, harassment or discrimination that they witness or of which they are the victim in complete security, thus guaranteeing a rapid and appropriate response to resolve these problems.

In Spain, we have also implemented a **mandatory training session on the management of equality**. This training session aims to promote equal opportunities and to prevent discrimination in all aspects of our activity. It enables employees to obtain a better understanding of the principles of equality and to develop the skills needed to promote an equitable and inclusive working environment.

The prevention of harassment and the promotion of equality are fundamental values that guide our actions and contribute to creating a health and inclusive working environment for all our employees.

#### — 5.3.1.1.3. Work/life balance

The balance between private life and professional life is a crucial aspect when it comes to favouring employee well-being and satisfaction. Our Group recognises the importance of this balance and is committed to putting in place measures aimed at supporting our employees in this area.

We offer flexible working policies that allow employees to manage their professional responsibilities more easily while at the same time reconciling them with their personal commitments. This may include **flexible working times, the possibility of working remotely or working part-time**. By giving employees more control of how they use their time, we foster their ability to respond to their family and personal obligations. In Belgium, the implementation of the "new labour deal" provided an opportunity to propose a change to a four-day week for employees or to alternate weeks with a variable number of hours, on a voluntary basis.

Promotion of a culture of respect for the boundaries between work and personal life is also primary. We encourage our employees to take regular breaks, to disconnect outside working hours and not to allow their personal time to be encroached upon by responding to non-urgent work-related requests. This allows them to conserve their energy, their mental health and their long-term engagement. **Agreements and guides on disconnecting** have been drawn up in the majority of Group entities and are available on its Intranet sites.

In addition, we strive to provide resources and support programmes to help employees manage the challenges associated with work/life balance. This can include assistance programmes for employees, advice on stress management or training programmes on managing time and priorities. These resources aim to support employees in their daily management of the various facets of their lives.

#### — 5.3.1.1.4. Gender equality

Gender equality is a fundamental value within our Group, and we are committed to putting in place measures aimed at guaranteeing equitable and egalitarian treatment for all our employees. We are aware that there may be wage differences between men and women and we are working actively to reduce these.

In 2023, in the absence of wage comparison between men and women in the same positions, we compared men's and women's salaries by category: 12%; middle management: 14%; management: 20%.

#### Overall, for the Group and its subsidiaries as a whole, the wage gap between men and women was 17%.

These measurements do not allow us to clearly identify the inequalities between men's and women's salaries but reflect above all differences in seniority (age, type of position, etc.) at all levels. In 2024, we should be able to make a real comparison using comparable conditions and responsibilities.

As an example of our actions in 2023, in Spain we signed **an equality plan** which aims to eliminate unjustified gender wage differences. This plan includes tangible measures to identify and correct wage disparities and policies to promote equal opportunities in all aspects of employment. Furthermore, **a mandatory two-hour training session** was organised to promote equality, covering gender discrimination, inclusive language and strategies to promote the culture of equality in the workplace.

In France, we continued the deployment of **mandatory training for all managers on discrimination-free management**. This training aims to raise our managers' awareness of problems of gender-based discrimination and of best practices for ensuring equitable treatment for all employees. Managers are encouraged to actively promote gender equality within their teams and to be pro-active in identifying and correcting any form of discrimination.

#### — 5.3.1.1.5. Promotion of physical and sports activities

Our Group is aware of the importance of physical and sports activities and attaches great value to the promotion of a healthy and balanced way of life for our employees. We believe that regular physical exercise contributes to overall well-being, to health and to satisfaction at work. Accordingly we have put in place several initiatives aimed at encouraging our employees to stay active and to take part in sports activities.



In Belgium, for example, we regularly organise events such as the Summer Walk, which brings our employees together for a convivial collective walk. We take part in **sporting challenges for charity** alongside our employees, such as *Kid's Care* and the *KickCancer* race in Belgium or Virtuoso in Italy. Furthermore, in Germany, we have set up an employee bike rental programme to promote the use of this ecological mode of transport while at the same time encouraging physical activity.

In Italy, we organise the GFL Sport event each year, which consists of tournaments of different sports disciplines such as football, bowling and beach volleyball. This allows our employees to meet, express their team spirit and celebrate the winners together at a convivial celebration.

In Spain, we have adopted the **WellWo application**, which offers well-being programmes, including advice on nutrition, physical exercise programmes and stress management techniques.

In France, we have installed a **gym** at our Paris La Défense premises so as to make physical exercise more accessible and practical for our employees. This initiative allows our employees to engage in regular sports activities, thus favouring their health and well-being.

# 5.3.1.2. An inspiring work environment

Within our Group, we take care to promote creativity, employee engagement, professional mobility and inspiring workspaces. These various aspects help foster a dynamic, innovative environment with a positive influence on our teams' levels of satisfaction and productivity.

#### — 5.3.1.2.1. Programmes and projects to promote creativity throughout Europe

We believe in the creative potential of our teams and we work actively to provide an environment that encourages the expression of this creativity. We put in place a variety of programmes and projects throughout Europe in order to stimulate creativity in our Group. For example, we have launched initiatives such as **InnovAction** and the **LightSpeed Hackathon** (see 3.2.3.1.1. and 3.2.3.1.2), which encourage employees to put forward and develop innovative ideas to resolve specific challenges.





We have also launched in-house challenges such as the **Data Champions League**: over six weeks, seven teams from different countries worked on putting together predictive models to understand how to use the data to reduce the number of subscription cancellations.

What's more, in order to facilitate exploration of the possibilities offered by the text generating models, we have launched an internal tool called **JackGPT**. Available via our Intranet, JackGPT allows all employees to familiarise themselves with the ChatGPT language model developed by OpenAI. By using JackGPT, our teams have the possibility of adopting innovative working practices and exploring new perspectives.

We actively encourage our employees to push the limits of traditional thinking, to develop their creativity, and to envisage innovative solutions to our current and future challenges.

## — 5.3.1.2.2. Strengthening employee engagement

Strengthening our employees' engagement is a priority for us. We have put in place a variety of initiatives in various countries to favour this engagement and reinforce the feeling of belonging to our Group.

Below are some notable actions undertaken in 2023 at European or national level:

- in Italy, the **Brunci** initiative brings general management and employees together at meetings organised every two weeks:
- in Belgium, we organise an annual **Company Day** to reinforce our employees' engagement, a day for celebrating the successes of the year, thinking about new challenges and strengthening ties within the company through *team building* sessions;
- in France, we have put in place several initiatives to strengthen employee engagement. We have a **sponsorship programme for new arrivals**, in which each new employee is accompanied by an experienced colleague to facilitate his or her integration and promote interaction, and we also organise specific welcoming sessions for new employees and for interns to help them familiarise themselves with our company and get their professional experience in the Group off to a good start.

#### — 5.3.1.2.3. Promoting and supporting mobility

We attach great importance to earning the loyalty and watching the development of our employees. Which is why we have an intra-group mobility system to favour their professional progression and evaluate their skills. This internal mobility is essential for encouraging new career trajectories.

#### In 2023, 145 people (5.72% of the workforce) benefited from intra-group mobility assignments.

It demonstrates our commitment to offering our employees opportunities for change and career development.

In order to facilitate employees' transition and integration within their new posts, in France we have introduced a mobility pack with accompaniment adapted to the situation of each employee, comprising training programmes to allow each employee to acquire the necessary skills for their new assignment.

#### — 5.3.1.2.4. Creating inspiring work spaces adapted to the new ways of working

Over the course of 2022 and 2023, our teams in France, Belgium (for the teams based in Berchem), Italy and Germany moved into new premises fitted out in flex-office style, suited to hybrid working and offering a modern environment with quality furnishings.



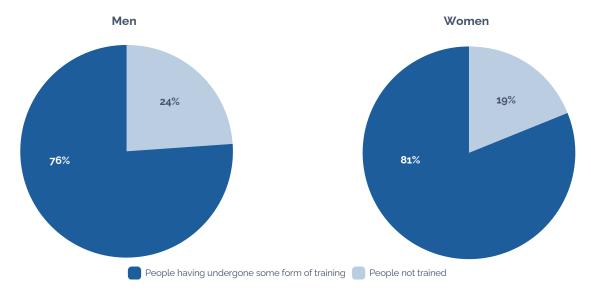


These premises provide flexible, convivial workspaces that promote collaboration and effectiveness and were specially designed to respond to the needs of hybrid workers, offering them the possibility of choosing where and how they wish to work. The workspaces proposed comprise shared desks, co-working spaces, meeting rooms and convivial spaces to favour informal interactions between employees. These new buildings reflect our commitment to adapting our working environment to the new realities of the world of work, giving priority to flexibility, collaboration and the well-being of our teams.

## **5.3.2. TRAINING AND SKILLS DEVELOPMENT**

To contribute to improving our employees' employability we implement training and skills development initiatives adapted to sectoral transformations. This past year we carried out a large number of awareness-raising and/or training actions on **artificial intelligence (AI)** (use of GPT4 and ChatGPT, see 5.3.1.2.1) and on ESG. Specific training plans were deployed on the prevention of harassment, the fight against discriminatory practices (see 5.3.1.1.2.5.), the protection of personal data (see 6.3.1.1.) and data security (see 6.3.1.2.). We also created personalised development plans for our employees in order for them to acquire the necessary skills and knowledge.

In 2023, 81% of women and 76% of men underwent some form of training. In all, we spent 0.65% of the payroll total on training.



Below are a few initiatives carried out in 2023 by way of illustration:

- in Germany, we organised training programmes on leadership for team leaders and English lessons for executives;
- in Belgium, workshops on **change management** were organised for all employees;
- in Italy, we proposed **linguistic training programmes** and training programmes on the use of the Office suite. We also put in place training initiatives to develop **digital skills in marketing, sales, CRM, content creation** and **publishing processes**;
- in Spain, we ran a training session on **business intelligence** and **intensive English language courses**. We also organised an introductory training session on the **creation of podcasts**;
- in France, the discrimination-free management programme was extensively deployed among managers.

In 2022/2023 we also held **ESG and Green IT training sessions** to raise all employees' awareness of ESG issues. In France, following these training programmes is a condition for benefiting from our incentive programme.



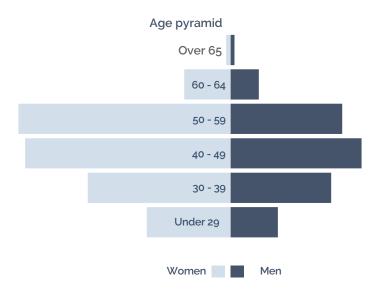
These examples demonstrate our commitment to fostering the development of our employees' skills and adapting our training content to the specific needs of each country and to changes in the sector. We firmly believe that continuous learning is essential to support our teams' professional growth and employability.

## 5.3.3. DIVERSITY AND INCLUSION

Diversity and inclusion are fundamental values for our Group, and we are committed to promoting the integration of different categories of persons within our company.

In the following section, we list the initiatives we have taken to promote diversity and inclusion among young people (see 5.3.3.1), seniors (see 5.3.3.2), women (see 5.3.3.3), persons with disabilities (see 5.3.3.4) and reservists (see 5.3.3.5).

The following illustration presents the demographic structure of our Group and its subsidiaries.



#### The headcount breakdown is as follows:

- 29 and under = 12%
- 30 to 39 = 22%
- 40 to 49 = 30%
- 50 to 59 = 29%
- 60 to 65 = 7%
- over 65 = 1%

In the Netherlands, 2023 was characterised by the reinforcement of the actions led by the team in charge of diversity and inclusion. Particularly notable was the holding of "serious game" sessions - *Join the Jam! Jam Cultures Game*. This initiative provides new ideas and tools for using the power of diversity in organisations and increasing the level of inclusion, confronting each person with their own unconscious prejudices.





## 5.3.3.1. Young persons

We are aware of the difficulties faced by young people when joining the world of work. Each year, our Group and its subsidiaries strive to offer them the best possible professional experience, whether on an internship or a work-study scheme.

In 2023, we welcomed 179 young people (annual apprenticeships, professionalisation contracts and internships) over the course of the year, equivalent to 7% of the Group's workforce.

In France, we have put in place a specific welcome day in our **intern on study placement integration programme.** This allows interns on study placements to familiarise themselves with the company, its values and its culture, and to obtain all the information needed to start their experience on the right foot. Training sessions, meetings with tutors and team building activities are also held with a view to encouraging their integration and their success within the company. In Spain, we support the **Exit Foundation,** whose mission is to **reduce school drop-out rates** among socially vulnerable young people through innovative and scalable training projects.

#### 5.3.3.2. Seniors

The employment of seniors is a major issue in the current context of ageing population and prolongation of working life. Promoting the integration of people of all ages into economic activity is crucial, recognising the value and the experience of seniors. A concrete example of the promotion of the employment of seniors is the **senior plan put in place by the Group in France.** A credit of five days of training per year is granted to employees over 58 (e.g. inter-generational communication, becoming a tutor) as well as  $\hat{a}$  la carte training modules.

## - 5.3.3.3. Women

Diversity and inclusion are essential elements favouring an equitable and productive working environment. One of the key aspects of this issue concerns the place of women in the company. Beyond the specific actions taken in matters of gender equality (see 5.3.1.1.4.), prevention of harassment, combating discriminatory practices (see 5.3.1.1.2.5), we focus on a few examples that aim to protect women or to turn the spotlight on their value within our Group and beyond.

For example, in Italy we collaborated with the **Libellula association** to develop a cultural and awareness-raising programme aimed at preventing and combating violence against women. Thanks to this association, we are now part of a network of businesses committed to working together to create a culture that combats and prevents violence against women. This translates into internal communication campaigns, training sessions and workshops aimed at raising employees' awareness of this problem and encouraging them to act against all forms of violence.



In Spain, **International Women's Day** 2023 provided an important opportunity to raise awareness of and promote gender equality and to highlight women's achievements in all areas, including the legal sector. An outstanding example is that of María de la O Martínez, Group Head of Innovation, who was recognised by the *Todojuristas* online legal review as one of the 100 leading women in the legal sector. This recognition shines a spotlight on women's skills and their contributions in this field while at the same time encouraging their participation and professional advancement.

## 5.3.3.4. Persons with disabilities

The inclusion of persons with disabilities in the company is an important subject, and our Group is firmly committed in favour of this cause. Inclusion consists in offering all individuals, whatever their disability, the same opportunities of access to employment and professional development. For example, in France we renewed our **partnership with the association ARPEJEH** to foster the recruitment of persons with disabilities. In Spain, we work with the **Capacis foundation** to integrate young persons aged 18 to 30 with reduced intellectual ability into our workforce.

Beyond our employees, we also work with service providers who facilitate the insertion of persons with disabilities (see 6.3.2.3.).

## — 5.3.3.5. Reservists

In 2024, the Group expects to analyse action pathways to implement the law of 1 August 2023 on military programming for the years 2024 to 2030.

Objectives	Indicators	Results	Progress	Remarks	2028 objectives
Increase employee well- being and satisfaction. Guarantee good working conditions, in particular	Employee NPS*	-3	1		Positive
with the spread of hybrid working. Provide an inspiring work environment and propose innovative projects. Ensure a work/life balance.	HappyAtWork and HybridWorkIndex survey participation rate	73.50%	<b>1</b>		More than 65%
Ensure a gender balance.	Wage difference between men and women	Employees: 12% Middle management: 14% Management: 20% Global: 17%		Overall, for the Group and its subsidiaries, the gap was reduced by 2 percentage points in 2023.	Less than 1%
Contribute to improving employees' employability by means of career management and skills development depending on sectoral transformations.	% of the wage bill dedicated to training	0.65%	1		4%
	% of men and women trained in the year	81% of women 76% of men			75%
	% of current employees who have experienced mobility during the year	5.72%	1		Above 1%
Help to integrate all	% of young people on internships or work-study schemes	7%	1		4%
persons, particularly the young, by means of economic activity.	Percentage of employees by age bracket	29 and under = 12% 30 to 39 = 22% 40 to 49 = 30% 50 to 59 = 29% 60 to 65 = 7% Over 65 = 1%			Stability

# 6. Governance: being exemplary in our own compliance

# 6.1. Challenges/risks

Compliance and business ethics are major issues for our Group and its subsidiaries. It is essential to set a good example in the conduct of business in order to safeguard the company's reputation, reinforce stakeholders' trust, manage risks, attract and retain talented employees and ensure the long-term sustainability of the business.

We must take care to **comply scrupulously with the laws and regulations** in force in the countries in which we operate. This implies upholding ethical practices and irreproachable conduct, particularly as regards respect for human rights and working conditions.

The main challenges and risks relate to our ability to comply, and to ensure that our stakeholders comply, with the rules relating to **business integrity**, the **fight against corruption** and **money laundering** and to make sure that the rules on **competition** are adhered to.

**Responsible purchasing** is another major issue for our Group. The selection of responsible and sustainable suppliers is crucial in this regard. The risks associated with irresponsible purchasing practices can entail dire consequences for our reputation, as well as shortages of resources or disruptions of our supply chain.

Lastly, in an increasingly inter-connected and data-driven world, the **protection of personal data** is a vital aspect, and we intend to prevent any violation of our stakeholders' privacy. Conscious as we are of the threats deriving from cybercrime, we work incessantly to reinforce our defences against any violation of the confidentiality, integrity or availability of personal data by means of ever-better technical and organisational measures.

# 6.2. Policies implemented and objectives

Faced with these challenges we have put pro-active and ambitious policies in place. The Group has several requirements: zero tolerance of violations of integrity, a determined commitment to a culture of ethics, a policy to combat corruption and lastly a structured approach to the protection of personal data.

As regards business ethics and relations with all our stakeholders, including third parties and suppliers, our **Group Ethics Charter** is a reference text that inspires choices and actions on a daily basis. Far from replacing the applicable laws and regulations in the countries where the Group operates, this Charter aims to promote compliance with them and to ensure that they are properly applied. This naturally forms part of fundamental principles such as those laid down in the Universal Declaration of Human Rights, the rules of the ILO and the UN Global Compact.

Our Ethics Charter aims to promote respect for the great international ethical principles and to ensure that they are properly applied, particularly those relating to human rights and the fight against corruption, and to make sure they are implemented in our Group's operations. Its objectives are to raise employees' awareness of certain risks, to instil appropriate behavioural reflexes in them and to promote an ethical culture within which dishonourable conduct has no place.

The **Group policy on gifts** complements the process and affirms zero tolerance of any conduct that can be considered tantamount to corruption or influence peddling, in line with our corruption prevention plan.

In order to comply with the fundamental principles of the regulations in force, and particularly the General Data Protection Regulation (GDPR), we have adopted a **policy of confidentiality of personal data**. Each country in which the Group operates has its own confidentiality policy.

Lastly, as regards cyber-security, our **information security policy** lays down security requirements and rules applicable to our information systems.

<b>Objectives</b>			
Compliance and business ethics	Facilitate the whistleblowing process for all stakeholders in all countries where the Group is present.		
Responsible purchasing  Work closely together with our suppliers to establish lasting relations based on to transparency and mutual respect.			
Cyber-security and data protection	Promote and implement the protection of personal data and the fight against cyber-risks by putting an effective organisation in place.		

# 6.3. Our actions and results

## 6.3.1. COMPLIANCE AND BUSINESS ETHICS

To ensure compliance and promote business ethics, we have put a Group-wide organisation in place, comprising a team dedicated to compliance and an ethics committee (see 6.3.1.1).

In 2023, we carried out an in-depth review of our Group Ethics Charter in order to make it more relevant and suited to the current challenges. It is distributed to all employees and translated into all official languages of the countries where the Group operates. Furthermore, in order to make sure that our policies are effectively implemented, we have strengthened our whistleblowing process. In parallel with this, we attach primary importance to the continuous training of our teams (see 6.3.1.2).

# 6.3.1.1. A Group compliance and ethics organisation

In order to ensure compliance with the laws and regulations in force, and to promote business ethics, the Group has established a solid organisation. This organisation comprises a Group team dedicated to compliance and an Ethics Committee, both of which play essential roles in implanting and maintaining responsible and ethical practices.

The compliance team dedicated to compliance, referred to as the **Group Compliance and Ethics Team**, is responsible for supervising and evaluating the conformity of the activities of the business. It works closely with the various internal stakeholders to identify compliance risks and take preventive measures, particularly with the **compliance officers** in each country in which the Group operates. The Group compliance team plays a key role in implementing the policies and procedures necessary to ensure compliance.

In parallel, the **Group Ethics Committee** supervises ethics-related actions with three main missions: to give advice and make recommendations on the Group's ethical culture; to receive whistleblowing reports; and to guide and monitor the handling of these reports. It plays a crucial role is safeguarding our integrity and our ethical values by seeing to it that the problems raised are handled appropriately and by taking appropriate remedial measures. The ethics committee met once in 2023 and its members exchange among themselves as often as necessary.

These organisational structures allow us to keep a permanent watch on our activities and to evaluate them, to detect any breaches and to take appropriate corrective measures.

### 6.3.1.2. Actions to promote transparency, integrity and compliance

In order to make sure that our policies are effectively implemented, we have strengthened our whistleblowing process by rolling out the **whistleblowing platform concept throughout Europe**, thus allowing all our stakeholders to report any suspicious behaviour or violation of Group policies anonymously. The reports received are processed confidentially and investigated in depth with a view to taking any necessary measures.



The global whistleblowing system was updated in 2023. The Group has taken effective measures to ensure the confidentiality of information and the processing of reports at all times. Following an investigation, where necessary disciplinary sanctions can be imposed on employees breaking the group's ethical rules, these sanctions can extend to dismissal. Employment contracts can also be terminated for serious breach of the Group's ethical rules.

As soon as a report is received, an acknowledgement of receipt is systematically sent within seven days. The

admissibility of reports is decided on within 14 days and, if the report is deemed admissible, it is immediately assigned to the entity concerned by the subject of the report.

#### In 2023, only one report was received and processed, giving a total of 100% of reports processed.

In parallel with this, we attach primary importance to the **continuous training of our teams**. We run regular training programmes to raise our employees' awareness of the rules in force and of best practices. These training programmes cover such crucial subjects as the prevention of corruption, the protection of personal data, the management of conflicts of interest and compliance with ethical standards. To ensure the effectiveness of this system, we have implemented annually alternating training programmes - one year on the fight against corruption and the next on the protection of personal data.

By combining these two initiatives, we are stepping up our commitment to transparency, integrity and compliance. The application of the whistleblowing platform concept throughout Europe facilitates the processing of ethical problems, while the continuous training of our teams allows them to acquire the skills needed to act ethically in all aspects of their work. These actions demonstrate our determination to maintain high standards in the conduct of our business and to favour a culture of integrity within our company.

#### 6.3.2. RESPONSIBLE PURCHASING

### — 6.3.2.1. New Group Charter

Our Group places great value on its purchasing policy and is firmly committed to adopting responsible purchasing practices. Accordingly, in 2023 we reviewed our **Group Ethics Charter** which applies to our suppliers and aims to promote sustainable and ethical practices that respect the environment. This policy encourages transparency, equity, diversity and inclusion in our relations with our suppliers. We are committed to selecting suppliers who share our values and conform to the highest ethical, social and environmental standards.

We strive to work closely together with our suppliers to establish lasting relations based on trust, transparency and mutual respect. We are aware that our purchasing decisions affect the entire supply chain and are committed to promoting responsible practices throughout this chain. In particular, we require our suppliers to have regular carbon assessments drawn up and to send these to us.

In the context of our purchasing policy, we have taken specific actions to centralise documentary exchanges (notably the signing of our Ethics Charter), as in France with the use of a secured platform (E-attestation).

### 6.3.2.2. Evaluation of third parties

Within our Group, collaboration with processors is of capital importance, and we are fully aware of the need to make sure that these partners comply with the rules on the protection of data and the fight against corruption. In order to ensure this compliance, we have established a rigorous **evaluation process** based on the requirements of the **GDPR** and of the **Sapin II Law**.

It is our duty to only use sub-contractors that provide effective protection of personal data. This requires us to supervise third parties' processes and be able to demonstrate their compliance with regulations. It also involves an evaluation of the service provider's compliance and regular checks on its processes.

In parallel, we also comply with the Sapin II Law by evaluating the integrity of our third-party providers. This is one of the most important aspects of the anti-corruption system. These arrangements also aim to ensure that third parties do not present risks of corruption for the businesses with which we have dealings.

In diagrammatic terms, the evaluation consists in collecting information on a given third party, identifying the risks of corruption that it presents and assessing the seriousness of these risks.

### 6.3.2.3. Actions aimed at working with businesses managed by persons from minorities or vulnerable groups

We have put in place concrete actions aimed at working with businesses managed by persons from minorities or vulnerable groups in our supply chain. We are proud to quote **some examples of partnerships that we have established in Belgium and Spain**.

In Belgium, we have established a partnership with Mirto, an enterprise managed by persons with disabilities, chosen in view of its commitment to social inclusion and its expertise in its field of activity.

In Spain, we work with Accesa, a social enterprise that provides cleaning and maintenance services and offers job opportunities to socially vulnerable people. We also work with IntegralAV, a company operating logistics and warehousing services and which promotes the integration of persons with disabilities. Additionally, we have put in place a partnership with the Fundación Juan XXIII, an organisation in Spain that supports the social and occupational integration of persons with intellectual disabilities.

These partnerships are an embodiment of our commitment to promoting social inclusion and equal opportunities in our supply chain. In this way we seek to create economic opportunities and to favour a more inclusive society. These actions reflect our values of equity, diversity and social responsibility, and we will continue to seek new opportunities to support these initiatives in the context of our responsible purchasing policy.

#### 6.3.3. CYBER-SECURITY AND DATA PROTECTION

In this age of growing connectivity and dependence on data, the protection of information and compliance with the regulations on confidentiality have become essential priorities for businesses. In this context, our Group and its subsidiaries are committed to taking rigorous measures, respecting the rights of individuals and ensuring the data security. More than just a legal obligation, respect for privacy is one of the Group's values and an essential commitment for maintaining trust-based relations with our employees, clients and partners.

### — 6.3.3.1. Personal data protection

In the context of our commitment to data protection and compliance with the regulations in force, we have put in place a **Group-wide coordination** and appointed a **data protection officer (DPO) in each country where we operate**. The Group DPOs are responsible for informing and advising the company on its legal and regulatory obligations concerning personal data, and for overseeing the conformity of data processing with regard to these obligations.

The DPO is the first point of contact for data subjects and the authorities in charge of personal data protection. These contact persons and DPOs play a crucial role in ensuring compliance with local regulations on data protection and in coordinating efforts aimed at ensuring the security of information. This network allows them to remain regularly informed of problems relating to the processing of personal data, to make sure they are processed consistently by the subsidiaries and to be alerted to any local legislative or regulatory changes.

The contact persons and DPOs are experts qualified in the area of data protection, and have in-depth knowledge of the local regulations specific to each country.

These specialists are responsible for several key tasks. They ensure that data protection policies and procedures are correctly implemented and adhered to by all of the company's departments. In particular, they are responsible for the deployment of the **confidentiality policy** and the **cookies** policy, as well as the proper handling of requests to **exercise rights**, each within their own country.

The principles of protection of privacy by design and by default are also in place, as are privacy impact analyses (PIAs).

They also ensure that **employees are trained and made aware** of data protection issues, and give advice and guidance on best practices in the area of information security and confidentiality. For example, in France and Spain, all the detailed procedures are accessible by all employees via the Intranet: GDPR governance, confidentiality policy, access to the Data Legal Drive processing register, kit for bringing websites into compliance, access to training materials, etc.

### 6.3.3.2. Security of information systems and data

The security of our information systems and data, and more broadly the security of information, are major concerns for the Group.



The security of information is covered by an information security policy (ISP) based on a risk management approach. The ISP is the Lefebvre Sarrut Group's reference document for information security. The requirements and security rules set out therein are objectives to be attained so as to ensure a satisfactory level of information security.

The ISP was drawn up on the basis of risk analyses and security audits of the information system and of international standards and good practices relating to information security.

Every year, we develop numerous projects for our clients (digital products and services) or for internal teams (CRM, publishing production tools, etc.) incorporating more and more technologies associated with artificial intelligence (see 3.2.3.2, 3.3.3.1 and 3.3.3.3).

In this context, we favour a "security by design" approach, which aims to incorporate security from the initial conception of our digital products and services with a specific approach regarding AI systems.

In France in particular, we set up a monitoring system for the security validation of business-line and IT projects through a governance body, the *Architecture Review Board*. This multi-stakeholder body examines projects, draws up recommendations and opinions and ensure that best practices in the fields of architecture, security, GDPR compliance, operability, integration, data and technology are adhered to and implemented.

Thus in France in 2023, 114 projects were examined from a security point of view by our cyber-security unit. In the other countries where the Group operates, there are systems for checking the cyber-security of business-line and IT projects, but formalisation is less mature. Our goal is to continue to monitor project security from initial conception so as to be able to contribute to ensuring the security of the products and services delivered and to extend this approach to all Group entities.

In 2023, France was the only country with a formal procedure for validating the security of business-line and IT projects. Our objective at five years is to implant a similar procedure in each country in which the Group operates.

Additionally, concerning the management of security incidents, we have measures and specific procedures in place to confront such situations effectively and pro-actively, formalised in our **Technical Security Directive - Management of Security Incidents.** When a potential security incident is detected, the cyber-security unit responds to evaluate the situation and take the necessary measures.

In line with our transparent and responsible approach, in cases where there are discernible impacts, we inform the stakeholders concerned, including our clients and partners, providing them with clear, precise information on the security incident that might concern them.

Furthermore, given that cyber-security is everybody's business, we carry out regular online awareness-raising **training sessions** on cyber-security for our employees and specific webinars and initiatives such as **Cyber Day**, which was held in France in November 2023 and allowed employees' awareness to be raised by means of new, fun teaching methods (demonstrations, interactive workshops and "serious games" based on issues linked to the security of information).

In summary, our commitment in the field of compliance, business ethics and data protection is reflected in rigorous processes, collaboration with our stakeholders and training of our employees.

We firmly believe that these efforts are essential in order to maintain the trust of all our stakeholders and ensure compliance with the laws and regulations in force.

Objectives	Indicators	Results	Progress	Remarks	2028 objectives
Facilitate the whistleblowing process for all stakeholders in all countries where the Group is present.	% of reports 100%		No prior data	The widespread roll- out of whistleblowing platforms in the various countries where the	100%
	Number of whistleblowing reports	1	No prior data	Group operates allows this figure to be reliably measured from 2023 on.	No objective
Work closely together with our suppliers to establish lasting relations based on trust, transparency and mutual respect.	% of suppliers who have signed the Group's Charter	Data for 2023 not available	No prior data	The absence of a recording system means that a reliable figure for 2023 cannot be produced. A system is scheduled to be implemented in 2024.	Close to 100%
Promote and ensure the protection of personal data and the mitigation of cyber-risks.	Number of countries in which a cyber- security validation procedure for all projects has been formalised	1	No prior data	France is currently the only country with a formalised procedure. In the other Group countries, cyber-security is monitored but without a formalised procedure.	The objective is to extend the formalisation of the cybersecurity validation procedure to all Group entities.

# 7. Comparative tables of indicators for the current and previous financial year

In view of the changes to the Group's CSR roadmap, the indicators for 2023 have been divided in accordance with the four major ESG orientations. All the indicators for 2022 have been included in the 2023 statement and some new ones have been added. For some new indicators, where data are available, the 2022 figure is published in order to obtain a comparison between the two financial years. The key performance indicators appear in bold followed by an asterisk.

### - 7.1. Contribution to society

Please note that the replacement of Google Analytics by other audience and usage analysis solutions for certain websites, in the interests of the protection of our users' personal data, means that continuity on the monitoring of 2023 is not exact as regards the number of users and the number of visits to our online content and solutions. A comparison of 2022 and 2023 is therefore not entirely possible, although the orders of magnitude of the data are similar.

Being a major player in law and compliance							
Challenges	Indicators	2023	2022	Progress	Remarks	2028 objectives	
Access to the law	Number of users of our online content and solutions*	34 million	32 million	4	The replacement of Google Analytics by other audience and usage analysis solutions for certain	Growth	
	Number of visits to our online content and solutions	102 million	91 million	4	websites, in the interests of the protection of our users' personal data, means that continuity on the monitoring of 2023 is not exact.	Growth	
	Amount of donations to promote access to the law	€301,000	€325,000		The Group and its employees showed exceptional motivation by contributing a donation of €40,900 to the Red Cross for Morocco, not counted in this indicator.	Stability or growth	
Innovation and self- disruption	Number of innovation initiatives created internally or with the ecosystem*	24	19	1		Approximately thirty	
Innovation and self- disruption	Number of hours dedicated to innovative projects (R&D + IT)	228,000	282,000	li.	The Spanish tax credit for R&D having become more restrictive, only half of the hours spent in Spain in 2022 could be taken into account in 2023.	Stability or growth	
	Client NPS*	38.8	35.1	4		Positive	
Customer ESG engagement	Client NPS on our ESG and compliance solutions (publishing + software + training)	37.6	24.9	1		Positive	
	Percentage of revenues generated by ESG and compliance offers	3.5%	2.9%*	4		5 to 10%	

<sup>(\*) 2022</sup> value corrected.

# — 7.2. Environment

Contributing to a more sustainable world							
Challenges	Indicators	2023	2022	Progress	Remarks	2028 objectives	
Mitigating climate change	% of our major suppliers who have been asked to provide a carbon assessment*	91%	No prior data			Close to 100%	
	Scopes 1, 2 and 3 of the carbon assessment (Biannual indicator)	Scope 2:	832.4 tCO <sub>2</sub> 507.7 tCO <sub>2</sub> 1,008.9 tCO <sub>2</sub>	No prior data	Next carbon assessment	Lower*	
	Percentage of the carbon assessment calculated (as opposed to inferred from financial data - biannual indicator)	30% N		No prior data	in 2024. This assessment will allow us to adjust our objectives and our transition plan.	Close to 100%	
Adaptation to climate change	Electricity consumption of buildings	2,229,603 KWh	No prior data			Lower*	
	Gas consumption of buildings	524,484 KWh	No prior data		In France, Spain and Italy, the buildings no longer consume gas.	Lower*	
Biodiversity and resource management	Percentage of PEFC or FSC paper in overall consumption	79%	79%		In France and Spain the percentage is above 99.	More than 90%	

<sup>(\*)</sup> To be quantified after our 2024 carbon assessment.

# — **7.3. Social**

Providing an inspiring work environment								
Challenges	Indicators	2023	2022	Progress	Remarks	2028 objectives		
Working conditions	Employee NPS*	-3	-39	1		Positive		
	HappyAtWork and HybridWorkIndex survey participation rate	73.50%	64.80%	4		More than 65%		
	Wage difference between men and women	Employees: 12% Middle management: 14% Management: 20% Global: 17%	Employees: 11% Middle management: 15% Management: 3% Global: 19%		Overall, for the Group and its subsidiaries, the gap was reduced by 2 percentage points in 2023.	Gap less than 1%		
Training and skills development	% of the wage bill dedicated to training	0.65%	0.50%	1		4%		
	% of men and women trained in the year	81% of women 76% of men	72.59% of women 68.23% of men	4		75%		
Training and skills development	% of current employees having been on mobility assignment during the year	5.72%	1.81%	4		Above 1%		
Diversity and inclusion	% of young people on internships or work-study schemes	7%	3%	4		4%		
	Employees by age bracket -> Age pyramid	29 and under = 12% 30 to 39 = 22% 40 to 49 = 30% 50 to 59 = 29% 60 to 65 = 7% Over 65 = 1%	29 and under = 11% 30 to 39 = 22% 40 to 49 = 32% 50 to 59 = 29% 60 to 65 = 5% Over 65 = 1%					

### — 7.4. Governance

Governance: cultivating our ethical values								
Challenges	Indicators	2023	2022	Progress	Remarks	2028 objectives		
Compliance and conduct of business	% of reports processed*	100%	No prior data		The widespread roll- out of whistleblowing platforms in the various countries where the Group operates allows this figure to be reliably measured from 2023 on.	100%		
	Number of whistleblowing reports	1	No prior data			No objective		
Responsible purchasing	% of suppliers who have signed the Group's Charter	Data not available	No prior data		The absence of a recording system means that a reliable figure for 2023 cannot be produced. A system is scheduled to be implemented in 2024.	Close to 100%		
Cyber-security and data protection	Number of countries in which a cyber-security validation procedure for all projects has been formalised	1	No prior data		France is currently the only country with a formalised procedure. In the other Group countries, cyber-security is monitored but without a formalised procedure.	The objective is to extend the formalisation of the cybersecurity validation procedure to all Group entities.		

# 8. Note on methodology

This statement on extra-financial performance (DPEF) was prepared in accordance with articles L.225-102 and R.225-105 of the French Commercial Code. The objective is to present the social and environmental consequences of the Group's activities. Lastly, monitoring the information allows us to:

- ensure that the values of the Group are respected;
- identify and manage our challenges and/or risks;
- define the policies and action plans allowing us to better manage the aforementioned risks and/or challenges.

For this year, we have confirmed the indicators tracked at the time of the publication of the 2022 statement, which allows us to establish a comparison between the two years. In addition to these indicators, we have defined some new ones in the areas of environment and governance. The governance indicators were worked on by the Stakeholders' Committee in order to strengthen our commitment as regards societal and environmental responsibility.

The indicators reflect the ESG roadmap of our Group and its subsidiaries covering the main non-financial risk factors and basic challenges identified. The indicators are broken down in accordance with four major strategic focuses:

- contribution to society: being a major player in law and compliance;
- environment: contributing to a more sustainable world;
- · social: providing an inspiring work environment;
- governance: being exemplary in our own compliance

Other than exceptionally, the results of the indicators are calculated over the period 1 January to 31 December 2023 (workforce at end of period, in particular).

### 8.1. Legal framework

In accordance with the provisions of Article L.225-102-1 of the French Commercial Code, our Group is required to publish a consolidated statement on extra-financial performance (DPEF) presenting information on the way we account for the social and environmental consequences of our activities. Our statement includes all the information stipulated in Article L.225-102-1, paragraph III, with the exception of the following areas:

- · combating food waste;
- · combating food insecurity;
- respect for animal welfare and responsible, fair and sustainable food.

These subjects were deliberately not addressed in the statement as, given our activities, our involvement is negligible.

In 2024, the Group expects to analyse action pathways to implement the law of 1 August 2023 on military programming for the years 2024 to 2030.

### 8.2. Scope of consolidation

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

- Juris, a company 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 breakdown of workforce;
- companies with five employees or less on the social indicators when they allow the employees concerned to be identified, except for the breakdown of the workforce.

The scope of consolidation therefore consists of 13 companies<sup>(2)</sup> (see organisation chart 5.1.8). These companies were also included in the scope of financial consolidation of the Group as at 31 December 2023. Relative to 2022, the scope has changed: the three French software application companies Lefebvre Dalloz Logiciel, Previsoft and Francis Lefebvre E-Compliance now appear under a single entity: Lefebvre Dalloz Logiciels.

Certain indicators have a different scope (examples: France only, Publishing, etc.) In this case, this is mentioned specifically at the start of the definition.

### 8.3. Data collection method

Data collection for the scope defined above is based on the four major strategic focuses.

- Contribution to society: being a major player in law and compliance. Concerning access to the law, data were collected using the Piano Xiti, Snowplow, Piwik, Google Analytics (in the process of being replaced throughout the Group), our CRM and lastly by the documents proving donations made and accounted for during the current financial year. For innovation and self-disruption, the data were collected with the aid of the monitoring documents on innovative projects and the hours devoted to R&D and IT projects. Data on client engagement were collected by means of a client survey coordinated by an external expert provider (Qualitest) and from the marketing and finance departments.
- Environment: contributing to a more sustainable world. Carbon balance sheet data were collected by the external provider Bartle and compiled in the AKTIO tool. The indicators relating to suppliers and to the use of certified paper were collected with the aid of monitoring documents. Lastly, the data concerning consumption of gas and electricity were collected from invoices of the supplies of these services.
- Social: providing an inspiring work environment. The data were collected from the human resources departments of all countries as well as from an employee survey carried out by an external provider (ChooseMyCompany).
- **Governance: being exemplary in our own compliance.** The data on whistleblowing were collected with the aid of a monitoring document. The data on cyber-security were extracted from a dedicated platform.

In order to ensure uniform understanding of the data collection exercise for the indicators selected, a reporting procedure has been shared with all contributing employees. The procedure seeks to ensure understanding of the context, the objectives, the scope and frequency of the collection exercise as well as defining the roles and responsibilities of each contributor.

<sup>2.</sup> The seven countries included for the financial year are: France, Italy, Spain, the Netherlands, Belgium, Germany and Luxembourg.

The 13 legal entities included are: FROJAL, Lefebvre Sarrut, Éditions Francis Lefebvre, Éditions Dalloz, Éditions Législatives, Lefebvre Dalloz Services, Lefebvre Dalloz Compétences, Lefebvre Dalloz Logiciels, Oppus by Lefebvre Dalloz, Lefebvre El Derecho, Sdu, Lefebvre Sarrut Belgium, Giuffrè Francis Lefebvre, Lefebvre Sarrut GmbH, ELS Partnership BV.

### 8.4. Indicators used

The indicators used were communicated to managers when the collection campaigns were launched, accompanied by a lexicon to ensure the good readability of each indicator. These indicators are mostly provided for the entire scope defined. Where the scope differs, a note specifies this. Lastly, the procedures and the indicators were subject to an external audit by our auditors RSM.

# — 8.5. Definitions of indicators present in the concordance table

#### — 8.5.1. CONTRIBUTION TO SOCIETY

# — 8.5.1.1. Number of users of our online content and solutions (number of unique visitors) \*

This is the number of unique visitors to our websites providing legal information, whether paid or free of charge. These might or might not be sites accessible by subscription, which might or might not require authentication by logging in. The total is the sum of unique visitors to each site (impossible to deduplicate them from one site to the next). The year of invoicing of our solutions is the current year. "Online content and solutions" is understood to mean all digital products (databases, newsletters, etc.). The store sites (or strictly commercial sites) are excluded from this scope.

- For our entities Éditions Francis Lefebvre, Éditions Législatives and Dalloz, the data are collected via the Piano XITI tool or Google Analytics (change of monitoring tool under way).
- For Spain, Germany, and Rocket Lawyer, Google Analytics was used to collect the data (change of monitoring tool under way).
- Italy and Belgium collected data using Google Analytics until the beginning of the summer of 2023, after which they migrated to Piwik.
- For our Netherlands subsidiary Sdu, data are collected using the Snowplow tool.

The number of users of our online content and solutions is a key performance indicator. The change in indicator results has been monitored since 2022. The comparison between the two financial years is presented in the comparative table for the current and previous financial year. Please note that the replacement of Google Analytics by other audience and usage analysis solutions for certain websites, in the interests of the protection of our users' personal data, means that continuity on the monitoring of 2023 is not exact.

### — 8.5.1.2. Number of visits to our online content and solutions

This is the number of visits to our websites providing legal information, whether paid or free of charge. A visit is a view or at least one loaded page. Uninterrupted interactions of at least 30 minutes are considered. The scope of calculation of the indicator (list of online solutions) is that of the indicator referred to above.

• For our entities Éditions Francis Lefebvre, Éditions Législatives and Éditions Dalloz, the data are collected via the Piano XITI tool or Google Analytics (change of monitoring tool under way).

- For Spain, Germany, and Rocket Lawyer, Google Analytics was used to collect the data (change of monitoring tool under way).
- Italy and Belgium collected data using Google Analytics until the beginning of the summer of 2023, after which they migrated to Piwik.
- For our Netherlands subsidiary Sdu, data are collected using the Snowplow tool.

The number of visits to our online content and solutions is a monitoring indicator. The change in indicator results has been monitored since 2022. The comparison between the two financial years is presented in the comparative table for the current and previous financial year. Please note that the replacement of Google Analytics by other audience and usage analysis solutions for certain websites, in the interests of the protection of our users' personal data, means that continuity on the monitoring of 2023 is not exact. The number of visits to our online content and solutions is a monitoring indicator. The change in indicator results has been monitored since 2022. The comparison between the two financial years is presented in the comparative table for the current and previous financial year.

#### - 8.5.1.3. Amount of donations

This is the amount of donations made over the year to associations or foundations working to guarantee access to law. These data are collected via the donations made in France, within the Frojal scope, our entity Sdu in the Netherlands and our subsidiary Lefebvre in Spain. N.B.: we have only selected the associations or foundations guaranteeing access to the law. Other actions are undertaken in our various French entities and foreign subsidiaries but they are not included here.

The amount of donations is a monitoring indicator. The change in indicator results has been monitored since 2022. The comparison between the two financial years is presented in the comparative table for the current and previous financial year.

# — 8.5.1.4. Number of innovation initiatives created internally or with the ecosystem\*

This is the number of "proofs of concept" ("POC", the standard term in the field of innovation). These are tests of technologies, products or of the way in which to market them, conducted internally or with third party partners (start-up, client, institutional partner, etc.). POCs can be current, launched or interrupted. The projects fall under a single country. They have been designed with teams from several countries, to a lesser or greater extent involved depending on the project. The countries involved in the projects recorded are France, Spain, Italy, Belgium and the Netherlands.

The number of innovation initiatives produced internally or with the ecosystem is a key performance indicator. The comparison between the two financial years is presented in the comparative table for the current and previous financial year.

# — 8.5.1.5. Number of hours dedicated to Research & Development (R&D) and IT projects

This is the number of hours dedicated to innovation research and/or development projects by internal employees or external providers (R&D or IT teams). If these hours are declared to the tax administration (such as the research tax credit - CIR - in France), these are the amounts used. Since the definition by the tax administrations of innovation projects varies greatly, there can be large differences between countries. The countries for which the number of hours was counted in 2023 are: France, Spain, Italy, Belgium, Luxembourg and the Netherlands.

The number of hours dedicated to Research & Development (R&D) and IT projects is a monitoring indicator. The change in indicator results has been monitored since 2022. The comparison between the two financial years is presented in the comparative table for the current and previous financial year. We would point out that in Spain, the definition of expenses eligible for the research tax credit has changed and is now much more restrictive.

### — 8.5.1.6. Client NPS (based on the brand of each country) \*

This is the Net Promoter Score. It measures client satisfaction, their engagement and their loyalty, based on the recommendation rate of a company by a client. We calculate this on the basis of the brand of each country: "Would you recommend [the country brand] to a client or partner?]". The result is obtained from the following calculation: [percentage of promoters (people who gave a score of 9 or 10)] - [percentage of detractors (people who gave a score of between 1 and 6)] multiplied by 100. The study is carried out by the third-party institute: Qualitest. It is used on all our clients, on all the markets of our entities. This indicator is obtained via a list defined by each country, with the French entities (grouped under the brand Lefebvre Dalloz) and the foreign subsidiaries with Sdu, Larcier-Intersentia, Giuffrè Francis Lefebvre, Lefebvre in Spain and Stollfuß in Germany.

The client NPS was calculated by the external service provider Qualitest at the beginning of 2024, which gives us representative figures for the financial year 2023. This is a key performance indicator (KPI) calculated annually since 2022. The comparison between the two financial years is presented in the comparative table for the current and previous financial year.

# 8.5.1.7. Client NPS in respect of our ESG solutions (publishing, training, software)

This indicator reflects client satisfaction with our environmental, societal and governance (ESG) offers, based on lists defined for each country by the marketing teams and then validated by the ESG teams and central management. Note that the offers considered are those that predominantly deal with subjects relating to ESG criteria. For example, the Labour Code is not considered despite its touching on social aspects. The client NPS for our ESG solutions is calculated from the same survey as the client NPS referred to previously. This indicator is obtained via a list defined by each country, with our French entities grouped under the brand Lefebvre Dalloz and the foreign subsidiaries with Sdu, Larcier-Intersentia, Giuffrè Francis Lefebvre, Lefebvre in Spain and Stollfuß in Germany. Note that data for Stollfuß are not available for this year.

The client NPS was calculated by the external service provider Qualitest at the beginning of 2024, which gives us representative figures for the financial year 2023. This is a key performance indicator (KPI) calculated annually since 2022. The comparison between the two financial years is presented in the comparative table for the current and previous financial year.

### 8.5.1.8. Percentage of revenues generated by ESG offers

This is the amount of revenues invoiced by country for these offers expressed as a percentage of total revenues invoiced by the Group. This indicator is calculated over a full year for our French subsidiaries grouped under the Lefebvre Dalloz brand and our foreign subsidiaries with Sdu, Larcier-Intersentia, Giuffrè Francis Lefebvre, Lefebvre in Spain and Stollfuß in Germany. Note that data for Stollfuß are not available for this year.

The percentage of revenues generated by ESG offers has been a monitoring indicator since 2022. The result of this indicator for 2022 has been corrected. The value shown previously was 4.6%. The result for 2022 after correction is 2.9%. The percentage of revenues generated by ESG offers is a monitoring indicator. The comparison between the two financial years is presented in the comparative table for the current and previous financial year.

#### — 8.5.2. ENVIRONMENT

# 8.5.2.1. Percentage of our major suppliers who have been asked to provide a carbon assessment\*

Our first carbon assessment revealed that 60% of our emissions were linked to our supply chain. These results are estimates based on the amount of expenditure incurred with our suppliers. Our first step must therefore be to better measure the impact of our suppliers' emissions, beginning with the largest suppliers. Our "major" suppliers are those with whom our annual expenditure is more than €100,000. The list of suppliers has been defined for each country.

The percentage of our major suppliers who have been asked to provide a carbon assessment is a key performance indicator. The indicator has been tracked since 2022. The comparison between the two financial years is presented in the comparative table for the current and previous financial year.

# — 8.5.2.2. Total emissions tCO<sub>2</sub> eq (metric tons of CO<sub>2</sub> equivalent) - Scopes 1, 2 and 3

This is the total volume of emissions expressed in tCO<sub>2</sub>eq for Scopes 1, 2 and 3 in accordance with the GHG protocol. The carbon footprint is calculated for each geographical site including all the countries where the Group is established (France, Belgium, Spain, Italy, the Netherlands and Germany). The carbon footprint was calculated by the external service provider Bartle and the data compiled on the AKTIO tool. Total emissions expressed in tCO<sub>2</sub>eq is a biennial monitoring indicator and has been calculated for the period October 2021 to September 2022. The data published in this statement on extra-financial performance are those of the study carried out in September 2022. A comparison of data for 2022 and 2023 is therefore not possible.

### 8.5.2.3. Percentage of the carbon assessment calculated (as opposed to inferred from financial data)

This is the share of the carbon footprint calculated from data belonging to the Lefebvre Sarrut Group, as opposed to data estimated on the basis of monetary ratios. The indicator is based on the carbon footprint for the period October 2021 to September 2022. The carbon footprint is calculated for each geographical site including all the countries where the Group is established (France, Belgium, Spain, Italy, the Netherlands and Germany). The carbon footprint was calculated by the external service provider Bartle and the data compiled on the AKTIO tool. Total emissions expressed in tCO<sub>2</sub>eq is a biennial monitoring indicator and has been calculated for the period October 2021 to September 2022. The data published in this statement on extra-financial performance are those of the study carried out in September 2022. A comparison of data for 2022 and 2023 is therefore not possible.

### — 8.5.2.4. Electricity consumption of our buildings

The indicator measures the annual consumption of electricity in kW/h for the year 2023. It is calculated on all the buildings made available to employees in each Group subsidiary:

- France: Paris La Défense. Electricity is supplied by two suppliers. For one of these two suppliers, it was not possible to obtain consumption data for the months of January and February;
- Italy: Milan, Rome, Varese, Monte Cassino;

- Belgium: Antwerp, Ghent, Leuven;
- · Luxembourg: Windhof Koerich;
- Spain: Madrid, Barcelona, Valencia, Seville, Bilbao;
- · Netherlands: The Hague, Helmond;
- Germany: Bonn. Note that for this year the data for Germany are not available.

This is a monitoring indicator; it is new relative to 2022. A comparison of data for 2022 and 2023 is not possible.

### — 8.5.2.5. Gas consumption of our buildings

The indicator measures the annual consumption of gas in kW/h for the year 2023. It is calculated on all the buildings made available to employees in each Group subsidiary. Only buildings that use gas are included in the scope:

- Italy: Milan. Gas was used until April in the subsidiary's old offices. Gas is no longer used in the new Milan offices;
- Belgium: Antwerp, Ghent, Leuven;
- Netherlands: The Hague, Helmond;
- Germany: Bonn. Note that for this year the data for Germany are not available.

This is a monitoring indicator; it is new relative to 2022. A comparison of data for 2022 and 2023 is not possible.

### — 8.5.2.6. Percentage of PEFC or FSC paper in overall consumption

This indicator denotes the percentage of paper labelled PEFC (French Forest Certification Scheme) and FSC® (Forest Stewardship Council®). These are two different forestry certifications certifying respect of the environmental, societal and economic functions of forests and ensuring the traceability of materials from the forest to the product. The FSC label guarantees that the products used are 100% recycled. Products carrying the PEFC label contain at least 70% recycled materials. This indicator's data are calculated on periodical publications, books and marketing documents, paper purchases and paper supplied from our subsidiaries Éditions Francis Lefebvre, Éditions Dalloz, Éditions Législatives, Lefebvre Dalloz Services, Lefebvre Dalloz Compétences and our foreign subsidiaries with Lefebvre, Sdu, Lefebvre Sarrut Belgium and Giuffrè Francis Lefebvre. The indicator has been tracked since 2022. The comparison between the two financial years is presented in the comparative table for the current and previous financial year.

#### 8.5.3. **SOCIAL**

### — 8.5.3.1. Employee NPS\*

This measures the satisfaction of the employee or collaborator by means of the rate at which a company is recommended by its employees. It is calculated at Group level "Would you recommend [the subsidiary] to your friend as a place to work?" The result is calculated using the following formula: [percentage of promoters (people who gave a score of 9 or 10)] - [percentage of detractors (people who gave a score of between 1 and 6)] multiplied by 100. The data and opinions are collected anonymously in all our subsidiaries by an external firm (ChooseMyCompany). The survey was conducted in 2023 with employees of all Group countries, including the United Kingdom, which, exceptionally, is included for this indicator. This is a KPI. The comparison between the two financial years is presented in the comparative table for the current and previous financial year. The previous survey was carried out in 2021.

### — 8.5.3.2. Percentage of the wage bill dedicated to training

This is the percentage of the total payroll dedicated to the training of employees in each country with an employment contract at 31 December 2023 excluding interns. The total payroll is based on theoretical gross salaries (fixed and variable) at 31 December 2023. The training expenses are identifiable, where "identifiable expenses" are the expenses dedicated to training invoiced by the accounts department over the year. Since the number of employees has remained stable in recent years, it was not considered necessary to account for the average number of employees over the year. This indicator has been a monitoring indicator since 2022. The comparison between the two financial years is presented in the comparative table for the current and previous financial year.

### — 8.5.3.3. Percentage of men and women trained in the year

This is the percentage of men trained in the year out of the total male workforce at 31 December of each year. Training hours only are considered. If a 20-hour training course takes place over 10 hours in December 2022 and 10 hours in January 2023, 10 hours will be counted for 2022 and 10 hours for 2023. The same definition applies to women-related data. This indicator has been a monitoring indicator since 2022. The comparison between the two financial years is presented in the comparative table for the current and previous financial year.

# — 8.5.3.4. Participation rate in the HappyAtWork/HybridWorkIndex questionnaire

The participation rate in the HappyAtWork/HybridWorkIndex survey is the number of respondents divided by the headcount, which is the number of people with an employment contract (open-ended, fixed-term and apprenticeship contracts). Interns are excluded. This is the same survey as for the employee NPS referred to above. The survey was conducted in 2023 with employees of all Group countries, including the United Kingdom, which, exceptionally, is included for this indicator. This is a monitoring indicator. The comparison between the two financial years is presented in the comparative table for the current and previous financial year. The previous survey was carried out in 2021.

### — 8.5.3.5. Gender wage difference

This is the pay gap between men and women in the categories Management / Middle Management / Employee, based on the following formula: (Men's salaries – Women's salaries) / Men's salaries.

- "Management" means people who, under the direct authority of the Country Manager, are responsible for a sector / department of the company that has an impact on the Group's results and strategy.
- "Middle Management" means people who, under the direct authority of the Department Manager, have an impact on the teams and resources and mobilise the achievement of results by the professionals for whom they are responsible.
- "Employees" means people who have an impact on the qualification of the activities and/or on the support and workload of the activities.

For standardisation and harmonisation aspects, the pay considered is theoretical and not real. Theoretical salary is understood to mean the pay for a person working full-time (8 hours), working from 1 January to 31 December of the current year without leave and without sickness, and including 100% of the theoretical bonuses of their variable pay. The employees taken into account are those with indefinite or fixed-term employment contracts, apprentices and interns being excluded.

The method of calculating average salaries for men and women, which is necessary in order obtain the indicator, has changed relative to the previous year. The method for calculating the average salary is now as follows: number of women multiplied by the average salary for women for each entity (management, middle management and employees, and for the whole Group). We aggregate the results of this calculation for each entity. We divide the sum obtained by the total number of women. We repeat the same procedure for men. This indicator of result is calculated for all employees of our French and foreign subsidiaries in service at 31 December 2023. This indicator has been a monitoring indicator since 2022. The comparison between the two financial years is presented in the comparative table for the current and previous financial year.

### 8.5.3.6. Percentage of employees by age bracket

This indicator takes account of the workforce at 31 December, with an open-ended or fixed-term contract (excluding fixed-term in the process of replacement) or with work-study contracts (apprenticeships and professionalisation contracts) in the headcount. Interns, temporary employees and service providers should not be counted. Employees included in the workforce must have an employment contract with one of the Group's entities.

This workforce is broken down by age bracket and presented as follows:

- 29 and under
- 30 to 39
- 40 to 49
- 50 to 59
- 60 to 65
- 65 and over

The age counted is the age at 31 December of the previous year for all subsidiaries. This indicator has been a monitoring indicator since 2022. The comparison between the two financial years is presented in the comparative table for the current and previous financial year.

### — 8.5.3.7. Percentage of young people on internships or work-study schemes

This indicator takes account of the number of interns in 2023 with an internship contract or a professionalisation contract or an apprenticeship contract. This indicator has been a monitoring indicator since 2022. The comparison between the two financial years is presented in the comparative table for the current and previous financial year.

### 8.5.3.8. Percentage of current employees who have been on mobility assignment during the year

This indicator is defined as the percentage of employees who have been on mobility assignment during the year. The percentage of employees is calculated by the number of people with an employment contract divided by the headcount at the end of the current year. Mobility denotes vertical and horizontal job changes, whether within the same company of the Group or to another company. This is associated with a modification of the employment contract. This indicator has been a monitoring indicator since 2022. The comparison between the two financial years is presented in the comparative table for the current and previous financial year.

#### 8.5.4. GOVERNANCE

### — 8.5.4.1. Percentage of reports processed\*

The indicator measures the percentage of whistleblowing reports received that were processed and resolved. This indicator enables the effectiveness of the whistleblowing report management process and compliance with the provisions of the Sapin II Law and the Group Ethics Charter to be evaluated. In Belgium and Spain, reports are sent via platforms accessible to internal and external stakeholders. In the other countries, reports are made to a dedicated email address, one for each subsidiary. The number of reports is a key performance indicator. This is a new indicator relative to the previous financial year. A comparison of data for 2022 and 2023 is not possible.

### — 8.5.4.2. Number of whistleblowing reports

The indicator measures the total number of whistleblowing reports received concerning alleged breaches of the Sapin II Law and/or the Group Ethics Charter. In Belgium and Spain, reports are sent via platforms accessible to internal and external stakeholders. In the other countries, reports are made to a dedicated email address, one for each subsidiary. The number of whistleblowing reports is a monitoring indicator. This is a monitoring indicator; it is new relative to the previous financial year. A comparison of data for 2022 and 2023 is not possible.

### — 8.5.4.3. Percentage of suppliers who have signed the Group's Charter

This is the number of suppliers who have signed the Group's Charter as a percentage of the total number of suppliers requested to sign it. The list of suppliers asked to sign the Group Charter is provided by each subsidiary. This indicator aims to evaluate suppliers' adoption of the Group's ethical principles and values by measuring the proportion of suppliers that have officially signed these Charters.

The absence of a recording system means that a reliable figure for 2023 cannot be produced. A system is scheduled to be implemented in 2024. This is a monitoring indicator; it is new relative to the previous financial year. The data relating to this indicator will be available for financial year 2024, not before.

# — 8.5.4.4. Number of countries in which a cyber-security validation procedure for all projects has been formalised

The indicator measures the number of countries that have put a formal procedure in place for the validation of all business-line and IT projects by the internal cyber-security team. Validation is made by a governance body with the aid of a dedicated tool ensuring the application of best practices as regards security, architecture, compliance and maintainability/exploitability for the IT system. This is a monitoring indicator; it is new relative to the previous financial year. A comparison of data for 2022 and 2023 is not possible.