

2023

# Duty of Care Plan



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econocom

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This duty of care plan was published on the Econocom Group website in December 2024. It applies to the 2023 financial year and refers to information published in the Extra-Financial Performance Declaration published in the 2023 annual report (indicators and actions implemented).

# Introduction

Econocom SAS is subject to the provisions of the French law of 27 March 2017 with respect to the duty of care of parent companies and contracting companies (“law on the duty of care”), which requires the implementation of a duty of care plan including reasonable measures to identify risks and prevent serious breaches with respect to human rights, fundamental freedoms, health and safety and the environment resulting from the activities of the company in question, of its subsidiaries and the sub-contractors and suppliers with which it has an established business relationship.

The duty of care plan should include:

- A map of risks designed to identify, analyse and prioritize risks;
- Regular procedures for assessing the situation of its subsidiaries, sub-contractors or suppliers with which it has a business relationship with respect to the risk map;
- Suitable measures to mitigate risks or prevent serious breaches;
- A whistleblowing system for reporting the existence or generation of risks, set up in conjunction with the company’s trade union bodies;
- A system for tracking the measures taken and assessing their efficacy.

# 1. Governance of duty of care at Econocom

The Legal department is in charge of overseeing duty of care. It is assisted in this task by the CSR department, which is in charge of environmental matters and Purchasing practices, and the Human Resources department of Econocom SAS, which is in charge of health & safety- and human rights-related issues regarding Econocom SAS staff.

## 2. Map of risks with respect to duty of care

### 2.1. Methodology for identifying risks

The risks assessed are those with a negative impact on human rights, health & safety of people, and the environment and resulting from the activities of Econocom SAS and its sub-contractors and suppliers.

An identification of gross risks was conducted as part of the negative impact materiality assessment as required by the CSRD directive. The probability of the occurrence of risks was also assessed, and a rating was given to the severity of the risks (based on the magnitude, scope and potential reversibility of the impacts) with respect to the specific nature of Econocom SAS's business [for more information on the overall double materiality assessment, please refer to EFPD 2023 p. 19 et seq.].

The assessment covered several of the consolidated French divisions of Econocom SAS, representing all Econocom SAS's business lines, i.e.:

- Distribution of IT equipment (Product & Solutions);
- Leasing solutions (Technology Management and Financing);
- Digital services (Services).

The human rights and environmental issues analysed as part of the double materiality assessment (European Sustainability Reporting Standards) cover the categories of risks assessed as part of duty of care in terms of:

- Health and safety;
- Human rights: the respect of workers' fundamental rights, fair and favourable working conditions, privacy and the rights of local communities;
- The environment: potential harm to biodiversity and natural resources (pollution, waste management, consumption of resources) and greenhouse gas emissions.

## 2.2. Summary of salient gross risks identified

Where Econocom SAS's activities are concerned, the most serious risks of negative impacts in terms of human rights, health & safety and the environment are:

Potential harm to employees' rights and health (particularly with respect to non-discrimination, living wage and psychosocial hazards);

- Potential violations of privacy associated with the protection and security of employees' and clients' personal data;
- Potential breaches of the fundamental rights and working conditions of suppliers and sub-contractors, particularly computer suppliers and manufacturers.

The potential impacts of Econocom SAS's **contribution of direct and indirect greenhouse gas emissions to climate change** (from both its own operations and those of its sub-contractors and suppliers) were also identified as salient.

The measures taken to prevent and mitigate each risk are classified and detailed below for each issue.

## 3. Measures for managing and mitigating risks

Below is a summary of the solutions implemented by Econocom SAS to manage the risks identified. These measures include the policies, processes and follow-up measures for each issue. To find out more about these initiatives, please refer to the relevant chapters of the 2023 EFPD.

### 3.1. Managing risks of negative impact on human rights and health & safety of employees

The human rights and health & safety programme is overseen by the Human Resources department.

Econocom Group has pledged to uphold the various international and national laws and standards, including the United Nations Global Compact and the Charter of the Institute for Responsible Digital (EFPD p8).

#### Health & safety in the workplace

Econocom has identified certain vulnerable groups of employees which are closely monitored. The criteria for this classification are the occupation, the client's activity and employee characteristics. The occupations concerned are (EFPD p70):

- Working in refurbishment factories;
- Working on the call centre floors of service centres.

These high-risk occupations, which are practised on the premises of Econocom SAS where refurbishing is concerned and Econocom Group SE for the service call centres, are monitored by a dedicated HR team (amount of time spent standing, noise levels, etc.). In 2023, a support and assistance system for managers and help desk technicians in Grenoble was rolled out to help them deal with difficult calls and situations, as well as providing comprehensive and early screening for hearing loss, with priority on employees working on the telephone (EFPD p70).

At-risk employees are also offered counselling if required.

Econocom's customers' business may also expose employees working on their sites to difficult working conditions, such as successive shifts or exposure to ionizing radiation. Specific close monitoring has been put in place for these employees in conjunction with occupational health and HR. In France, medical check ups are semi automated in order to make the process more reliable. This new tool, introduced in 2023, ensures monitoring and the provision of reminders of medical check ups, particularly for these vulnerable categories of employees (EFPD p71).

### **Discrimination and harassment**

Econocom Group SE has implemented a number of measures designed to combat all forms of discrimination in the workplace.

The Code of Business Conduct specifies, in chapter 8, "Fight against discrimination", the benchmarks for non discrimination, notably in terms of race, gender, age, health, religion, sexual orientation, or political, religious or trade union affiliations.

There are also procedures to ensure responsible, harmonized practices in recruitment, HR management and training. Recruitment managers are thus very sensitive to non discrimination practices and to promoting the employment of workers with disabilities via the disability agreement.

Attention is paid to employees who may be subject to inequity, in order to guarantee rights and equal treatment. Committed to promoting diversity, Econocom has established procedures to help employees from overseas with the legal procedures required to obtain and maintain residence permits.

Furthermore, Econocom SAS has launched a number of initiatives designed to boost the recruitment of women in the Group's Services business (EFPD p84/205), including:

- Attracting and recruiting via career changes with the #ReconversionFemmes Numérique Manifesto.
- The Women in Digital scheme.

In France, the gender equality index calculated in 2023 for 2022 was 86/100 for the Group (EFPD p84).

In order to promote the employment and inclusion of people with disabilities in Econocom SAS's subsidiaries, a partnership agreement was signed in 2014 with the AGEFIPH (Association pour la Gestion du Fonds pour l'Insertion Professionnelle des Personnes Handicapées – Association for the Management of the Fund for the Professional

Integration of People with Disabilities) and a disability agreement was signed in 2018 and renewed in 2021 for three years (EFPD p88/p208).

Training to increase awareness of disability among all internal stakeholders was provided by an external firm during events such as the European Week for the Employment of People with Disabilities (EFPD p88/210). Econocom is also a signatory of the “Inclusion Manifesto”, an association with more than 130 signatory companies committed to employing of people with disabilities and thus help transform society and make diversity a strength (EFPD p87).

Lastly, Econocom’s extra-financial targets related to social actions include:

- Reaching between 5% and 6% of people with disabilities by 2025 (EFPD p. 7);
- Diversity: improving the Gender Equality Index by 2 points per year (EFPD p. 7);
- Ensuring 80% of employees complete ethics training by 2025 (EFPD p. 7);
- Ensuring 90% of employees complete GDPR training by 2025 (EFPD p. 7);
- Ensuring 90% of employees complete cybersecurity training by 2025 (EFPD p. 7).

Where harassment is concerned, the abovementioned Code of Conduct has a zero-tolerance policy, with disciplinary measures in place for employees, agents or business partners, and Econocom reserves the right to cease all business dealings with such providers.

Furthermore, a “harassment” correspondent has been appointed at Econocom Workplace Infra Innovation SAS, a subsidiary of Econocom SAS.

### **Social protection**

Econocom SAS is governed by the Syntec collective agreement (EFPD p72).

The company provides social protection which covers key family events for 98% of employees with the aim of fostering long-term commitment of employees as they receive support during key moments in their lives (EFPD p70).

As such, Econocom SAS has implemented an employee health policy and in 2024 provided health check-ups for employees over the age of 40 as part of a cancer prevention campaign. In 2023, the following measures were implemented: a flu vaccination campaign, 60% social protection coverage and paternity leave at full pay for employees with more than a year of service.

### ***Potential violations of privacy associated with the protection and security of employees’ and clients’ personal data***

### **Security and protection of employees' personal data**

Since 2022 Econocom Group has had a Chief Security Officer who is in charge of overseeing security practices and commitments for all the companies in the Econocom galaxy (EFPD p31).

A security strategy called Minimum Viable Security (MVS) was thus implemented and employees now receive cybersecurity awareness training: in December 2023, 57.4 % received training, compared with 41.3% in September 2023.

In eight of the nine main countries where the Group operates, Econocom has at least one ISO 27001-certified company (for a total of 13 certified companies).

In addition, in order to protect employees' data, Econocom has designed and rolled out the "Data Protection Programme" across all its entities, coordinated by the Group DPO who is assisted by 47 Data Protection Representatives (EFPD p.32-33).

In France, remote working became more widespread in 2022 and five major projects were launched (EFPD, p.214):

- An ambitious remote working agreement to improve the working conditions of eligible employees;
- Conversion of workspaces into collaborative spaces across all Econocom sites;
- Ensuring optimal use of our IT tools: roll out of MFA to secure remote connection;
- Remote working monitoring tool with Teamplanner;
- Assistance for managers to support teams in a hybrid organization.

### **Protection and security of the customer's personal data in the context of data collection, use and storage**

The above-mentioned "Personal data protection" programme also applies to the personal data of Econocom's clients.

## **3.2. Managing risks of negative impact on the environment**

Econocom Group SE's strategy for managing environmental risks is managed and coordinated by the CSR department which is in charge of setting common targets, monitoring performance and publishing directives concerning Econocom SAS's minimum requirements. The CRS policy is coordinated via a CSR Steering Committee made up of directors representing the Group's main functions. It approves the strategic priorities and objectives of the CSR programme and ensures that objectives are met. A panel of CSR correspondents, representing different departments and countries, has also been set up. These correspondents are members of the operational teams of the CSR Steering Committee members and are responsible for the operational implementation of the action plans approved by Committees, and also act as ambassador for the policy to their teams.



Econocom's climate transition plan is described in the 2023 Extra-Financial Performance Declaration [pages 35 et seq.].

### **3.3. Managing risks associated with suppliers' and sub-contractors' practices**

Where supplier relations are concerned, in 2015 Econocom Group drew up its responsible purchasing policy to establish trust based relationships with its suppliers by encouraging them to implement a CSR programme (EFPD, p95) and manage social and environmental issues, with the aim of making a positive impact on the Group's suppliers (Responsible Purchasing Charter between Econocom and its suppliers, p. 2).

To that end, the Group has established a Responsible Purchasing Charter with its suppliers, based on the ten principles of the United Nations Global Compact, and has pledged to promote their application by its suppliers and their sub-contractors (Responsible Purchasing Charter between Econocom and its suppliers, p. 4). The charter is sent to critical and strategic suppliers, who are required to return it signed to confirm that it has been taken into account and applied.

The Group has also implemented a Code of Business Conduct in order to fight corruption and influence peddling. This Code is accompanied by a set of procedures and policies dealing with associated ethical issues (gifts and invitations, conflicts of interest, etc.).

Compliance with this Responsible Purchasing Charter and Econocom Group's Code of Business Conduct is also assessed, for certain subsidiaries, through ad hoc contractual clauses. Efforts are currently underway to apply this policy across the rest of the Group and which should be effective as of 2024. (EFPD, p95).

Econocom ensures that all its suppliers comply with human rights and any ethical, social and environmental standards it deems fundamental and crucial for successful collaboration (EFPD, p95). To that end, the Group's Responsible Purchasing Charter sets forth Econocom's commitments and requires that all its suppliers also observe them (EFPD, p95).

These commitments concern the following matters:

- Business ethics: fighting corruption, use of company financial assets or data, conflicts of interest (Responsible Purchasing Charter between Econocom and its suppliers, p.5);
- Human rights and labour rights: Econocom Group undertakes to comply with human rights laws and the principles of the fundamental conventions of the International Labour Organization (ILO). It also demands that its suppliers comply with local and international regulations applicable with respect to the fundamental conventions of the ILO, in particular the elimination of discrimination, observance of labour rights, and health & safety (Responsible Purchasing Charter between Econocom and its suppliers, p.6);
- The environment: reducing GHG emissions, transition to a circular economy, impacts on the environment and biodiversity (Responsible Purchasing Charter between Econocom and its suppliers, p.7).

Furthermore, Econocom's commitments to complying with the principles upheld by the International Labour Organization, risk prevention in the fields of workplace safety, protection of the environment and mitigating the consequences of parties' activities on the environment are formalized in the General Sales Conditions and outsourcing contracts, which include a specific clause on this subject.

## 4. Whistleblowing system

In order to strengthen its duty of care policy with respect to ethical risks, Econocom Group has a whistleblowing platform. This system was set up to collect and process reports of situations in breach of the Code of Business Conduct and/or regulations applicable to the Group (in cases of corruption/fraud, etc.). This whistleblowing system is available to anyone working for Econocom Group (executives, employees, temporary staff, interns, etc.) as well as to any external third party which has a business relationship with the Group. It is available in several languages including French, English, Spanish and Italian, 24/7. The platform is secure and the reporting process is encrypted and password protected (EFPD p26; Whistleblowing system, p. 3).

The whistleblowing system is an addition to the other reporting channels that have already been put in place by Econocom Group (e.g. line managers, Human Resources, etc.). (Whistleblowing system, p. 3-4).

A number of channels have been developed to enable human rights incidents and complaints to be reported (EFPD p93):

- Appointment of a "harassment" correspondent in Econocom Workplace Infra Innovation SAS, a subsidiary of Econocom SAS;
- Reporting channels through management, Human Resources;
- The Ethics Committee's secure platform.

Alerts are processed by the Ethics Committee which consists of four members and operates entirely separately and independently from the parties concerned by the alert.

In 2023, six alerts were submitted via the whistleblowing platform. None of the ethical alerts resulted in any legal proceedings (EFPD p26-27).

Subject of the alerts (p27):

- Business ethics: 1
- Social responsibility and human rights: 5

It should be noted that the "Social responsibility and human rights" category includes reports concerning discrimination, harassment and health & safety.

## 5. Monitoring processes

The duty of care plan is monitored via a series of systems for monitoring human rights, health & safety and environmental matters, as well as the overall monitoring of the duty of care process.

In addition, quantity indicators have been selected to report on duty of care initiatives with respect to the risks identified (see the Table of indicators in “Report on Operational Implementation”).

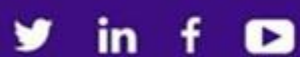
# 6. Report on operational implementation

In addition to the measures carried out in 2023 described in previous chapters, the following indicators give an overview of the implementation of the duty of care plan in 2023.

Issues	Salient risk	Key indicators	Objectives	2021	2022	2023
<b>Human rights</b>	Working conditions for employees without permanent contracts	Number of external contracts				Interns: 138 Temp workers: 782 Service providers: 548 Total: 1,468
	Remuneration policy	% of employees not adequately remunerated				0%
	Quality of life in the workplace					
	Anti-discrimination measures – gender parity		Amélioration de 2 points par an pour l'index égalité Femme / Homme			86/100
	Anti-discrimination measures – Number of people with disabilities		Atteindre entre 5 et 6% de personnes en situation de handicap pour 2025			5%
<b>Health &amp; safety</b>	Privacy with respect to the protection of employees' personal data	% of employees who received GDPR training (in France)			80%	85%
	Privacy with respect to the protection of clients' personal data					
<b>Environment</b>	GHG emissions	% of electric/hybrid vehicles		/	13%	25%
	GHG emissions	Purchasing products		CO2 (t) 535 986	CO2 (t) 650 313	
<b>Whistleblowing system</b>		Number of ethical alerts		13	0	6



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