

# Global Human Rights Policy

Dear customers, suppliers, and partners,

At VusionGroup, respect for Human Rights begins with a responsibility to treat everyone with dignity and respect. VusionGroup strives to ensure that the products and services it provides are produced in a manner that respects Human Rights. As developers of IoT and digital technologies, we believe in the power of technology to empower and positively impact society. Business, in our view, can and should be a force for good, sustainable, and human-centered.

This Global Human Rights Policy governs how VusionGroup treats everyone it does business with from customers and teams to business partners and the supply chain. VusionGroup is deeply committed to respecting and upholding the Human Rights of everyone it engages with.

## Commitment to International Human Rights Standards

VusionGroup recognizes its responsibility to respect and uphold internationally recognized Human Rights standards. This commitment extends to preventing violations through the ethical treatment of its workforce and those in its value chain. VusionGroup is dedicated to embedding respect for Human Rights throughout its business and operations globally. Our approach to ensuring respect for Human Rights worldwide is to align our principles with the most stringent national and international laws, principles, norms, and technical standards, including major international conventions.

As a global business, VusionGroup is deeply committed to respecting and supporting Human Rights (civil, political, economic, social and cultural) across all its business operations, as set out in the UN International Bill of Human Rights<sup>1</sup> and the core conventions of the International Labor Organization (ILO), as well as the [ILO's Declaration on Fundamental Principles and Rights at Work](#). VusionGroup's approach is based on the [UN Guiding Principles on Business and Human Rights](#).

It has also signed up to the following initiatives:

- [UN Global Compact](#)
- [Sustainable Development Goals \(SDGs\)](#)
- [Women's Empowerment Principles](#)
- [Women Initiative Foundation](#)
- [La Charte de la Diversité](#)

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<sup>1</sup> This consists of the [UN Universal Declaration of Human Rights](#), the [International Covenant of Economic, Social and Cultural Rights](#) and the [International Covenant on Civil and Political Rights](#).

## Fundamental Principles and Initiatives

[The Diversity and Inclusion \(D&I\) program](#) lays out how to build an inclusive workplace culture regardless of geographic location, one in which every VusionGroup employee should feel empowered to grow and thrive.

The [Code of Ethics](#) and the [Commitment to the ILO MNE Declaration and respect for its Guidelines](#) policy reflect how VusionGroup promotes a culture of integrity across the company and underpins its approach to Human Rights and responsible business practice.

[The Supplier Code of Conduct](#) forms the basis for addressing social concerns across the supply chain.

All employees, suppliers, partners and vendors are required to sign the Code of Ethics or the Supplier Code of Conduct when conducting business with VusionGroup.

- Supplier Accountability:

As part of its commitment to society, its employees and the environment, VusionGroup requires its suppliers to behave ethically with the same legal standards with their workers while providing quality goods and services at a fair price.

To this end and to ensure transparency, EcoVadis assessments and ratings are used in the supplier selection process. The EcoVadis evaluation includes 21 sustainability criteria across four core themes: Environment, Labor & Human Rights, Ethics and Responsible Procurement. This is used to assess and drive sustainability improvement across the value chain on a yearly basis.

The top tier suppliers are subject to annual EcoVadis audits to ensure they meet sustainability and quality standards as well as they comply with the sustainable purchasing policy of the Group: more than 97% of industrial purchases and the Group's main indirect suppliers are audited on a yearly basis through EcoVadis sustainability assessments. Since 2023 these sustainability ratings assessments have been extended to enlarge the scope to include all other relevant suppliers across the value chain.

This enables VusionGroup to evaluate its suppliers' performance on Human Rights including human trafficking and slavery among other sustainability criteria.

VusionGroup also accepts ratings from international companies such as ISS ESG, MSCI, and Sustainalytics.

- Basic Rights:

VusionGroup respects the basic rights of workers as those rights are enshrined in the laws of the countries in which it operates and where its suppliers are based. These basic rights include:

- The elimination of all forms of forced or compulsory labor;

- The elimination of discrimination, harassment or abusive behavior in respect to employment and occupation;
- Protection of vulnerable and minority groups and their rights;
- Freedom of association and the right to collective bargaining

- Anti-discrimination and Harassment:

VusionGroup will not tolerate any form of discrimination on any basis<sup>2</sup>. It prohibits harassment, violence and retaliation of any kind and has zero tolerance for violations motivated by any form of prejudice.

VusionGroup is committed to creating a work environment that is free of inappropriate behavior and harassment of any type<sup>3</sup>. Employees are responsible for supporting VusionGroup in its endeavor to protect others from such harassment.

Wherever harassment occurs in the course of an employee's duties as a result of an act or omission by a third party or outsider, VusionGroup will take all necessary and reasonable steps to support the person concerned. This will include the preventive actions outlined in the [Code of Ethics](#), signed by all employees and on which employees receive training, and in the [Whistleblower Policy](#).

- Diversity:

VusionGroup is deeply committed to improving diversity, increasing inclusion, and advancing racial justice and gender equality. This is achieved by developing a Diversity and Inclusion (D&I) program in addition to:

- Protecting women's rights as well as those of minorities and vulnerable groups;
- Promoting the diversity of collective cultures and of each individual.

VusionGroup actively creates and promotes an environment that is inclusive of every person and their uniqueness. It promotes diversity as a strategic and competitive business advantage. As it continues to grow, embracing diversity in every aspect of its business is vital to its long-term success.

- Gender Equality:

As a signatory of the [UN Global Compact](#), VusionGroup has a long-standing commitment to diversity, equity and inclusion. It is deeply committed to promoting gender equality and women's empowerment in the workplace.

For this reason, the [Diversity and Inclusion \(D&I\) Program](#) launched in September 2021, specifically focuses on gender equality to ensure that women have the resources and equal opportunities to learn and grow at VusionGroup. This program also includes an individual

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<sup>2</sup> Including national or social origin, birth, caste, race, gender, gender identity, gender expression, sexual orientation, age, marital status or pregnancy, ethnicity, actual or assumed membership or non-membership of a specific ethnic group, language, morals, property, political or other opinions, trade union or cooperative activities, union affiliation, religion and religious beliefs, physical appearance, surname or on the grounds of health or disability, or other distinguishing characteristics.

<sup>3</sup> Based on gender, sexual orientation or gender identity, nationality, race, ethnicity, indigenous or social origin or religion, marital status, age, disability, political or other opinion, and union membership.

axis offering mentoring, leadership training and personal development plans designed to boost women's careers within the company.

VusionGroup is very proud of the progress it has made as a diverse and inclusive employer. Consequently, it is thrilled to support the [UN Women's Empowerment Principles](#) to drive positive change.

VusionGroup monitors pay gaps across employees to avoid any kind of discrimination. This is done when employees are hired and every year across the organization (in France this is measured via the "index égalité professionnelle", gender pay gap index).

VusionGroup's efforts are driven by a strong desire to create a welcoming and supportive environment and to overcome any kind of discrimination, injustice and harassment. All VusionGroup employees are required to sign the Code of Ethics and to complete the related interactive online training on "*Discovering ethics and real-life situations*" that explains the principles of the Code of Ethics and includes decision-making scenarios. This reflects VusionGroup's commitment to respecting human rights and to conducting business in an ethical and honest manner, and in full compliance with applicable laws and regulations.

Furthermore, all employees have free access to additional training on LinkedIn Learning and the 360Learning platform on unconscious bias, diversity and gender equality.

- *Health and Safety:*

To drive innovation and foster operational excellence, VusionGroup is heavily dependent on the talent and engagement of its employees.

VusionGroup is committed to providing employees with safe, healthy and productive working conditions. This includes the security arrangements detailed in the [Health and Safety Policy](#). On top of being the right thing to do, this commitment is key to VusionGroup's success and long-term employee retention.

- *Career Development:*

VusionGroup is committed to offering employees equal opportunity to career development. Employees are hired solely on the basis of their education, professional experience and potential to add value.

VusionGroup intends to promote equal opportunity and gender equality at all career stages. To this end, the main thrust of the D&I (Diversity and Inclusion) Program is to increase female representation and diversity in leadership and at all levels of the company.

- *Data Protection:*

At VusionGroup, we recognize that fostering an inclusive and diverse environment is essential for the well-being and engagement of our employees. Just as we value diversity and inclusion, we place paramount importance on protecting the personal data of our employees, partners, suppliers and clients. Ensuring the confidentiality and security of personal information is a crucial aspect of our commitment to respecting everyone's rights.

VusionGroup places great importance on complying with data protection rules. VusionGroup has strengthened the security and confidentiality of data on VusionGroup's stakeholders.

VusionGroup processes personal data to manage relationships with its employees, clients, suppliers and partners. The data collected is necessary for such processing and is intended for VusionGroup teams and, where relevant, those of its subcontractors and suppliers.

VusionGroup's employees, clients, suppliers and partners are entitled to enquire about, access and correct their personal data as well as to object to the processing thereof for legitimate reasons.

VusionGroup's partners must respect the confidentiality of personal data and comply with applicable laws governing the protection of personal data in accordance with VusionGroup's Privacy Policy.

For reference, all employees with access to personal data have signed a document in which they undertake to take every precaution in line with the GDPR to safeguard the confidentiality of the information to which they have access. They specifically undertake to prevent it from being communicated to people not expressly authorized to receive it.

Furthermore, employees with access to and who process personal data receive dedicated trainings and all employees are aware of the GDPR and its impact on their daily operations.

Furthermore, in its [Supplier Code of Conduct](#), VusionGroup encourages its suppliers to adopt a dedicated data protection policy limiting the collection of personal data to whatever is relevant and necessary for the activity, and requiring the lawful, fair and transparent processing of such data.

Ultimately, to drive innovation and foster operational excellence, VusionGroup heavily relies on the talent and engagement of its employees, which are the key to its success. VusionGroup's goal is therefore to provide an open and inspiring work environment in which employees can fulfil their potential. It is thus critical that VusionGroup maintains a strong commitment to high standards ensuring a fair, respectful and safe workplace for all employees.

## Scope and Applicability of the Global Human Rights Policy

These principles outline VusionGroup's approach to Human Rights across all aspects of the company regardless of geographic location and level of operations (suppliers, vendors and partners). In fact, VusionGroup engages with all its subsidiaries and in all its business dealings with suppliers, vendors and partners to apply and respect the same internationally recognized Human Rights standards.

## Reporting Mechanism

Asking a question or reporting a concern requires courage. All VusionGroup employees are expected to speak up. When they do, they protect VusionGroup, its brand and its facilities. This helps improve its operations and prevent potential misconduct.

If you are an VusionGroup employee and you feel you need to report unethical behavior, or if you have a doubt or question, please feel free to contact:

- Any manager
- A member of the HR or Legal Department
- A member of the employee representative committee.

You can also contact the whistleblower service via MyLily, your internal digital platform. There you can choose to anonymously report an unethical situation or behavior through the "Ethics" dashboard or by emailing [ethics@vusion.com](mailto:ethics@vusion.com).

Dear suppliers, vendors and partners:

Developing strong, sustainable and ethical relationships also means that VusionGroup must make itself available to answer queries and questions.

Please reach out to your contact person at VusionGroup or email [ethics@vusion.com](mailto:ethics@vusion.com) should you have any question regarding the application of or want to report the infringement of any of these policies:

- Human Rights Policy;
- Labor Rights Policy;
- Anti-Discrimination, Anti-Harassment and Promotion of Diversity Policy;
- Code of Ethics;
- Supplier Code of Conduct.

If you are an external or occasional contractor of VusionGroup please email [ethics@vusion.com](mailto:ethics@vusion.com)

For additional information on the reporting mechanism at VusionGroup please read the [Whistleblower Policy](#).

## Responsibilities

ExCom is responsible for the policy's approval.

EVP ESG and SEVP Group Human Resources own, endorse and ensure the implementation of the policy.

Relevant group VPs, Country Managing Directors, regional and local management are responsible for ensuring that this policy and related standards are implemented and adhered to, and that all relevant employees are made aware of the policy and its requirements. They ensure local compliance with the policy including adequate control measures to eliminate or reduce risks and direct behavior in breach of the policy.

Group Human Resources drives the implementation of the policy and provides specific advice on labor and human rights issues. It also ensures that labor and human rights issues are identified and addressed. Audits, reviews, measurements and reports are done on labor and human rights performance.

Sustainability and Legal teams advise policy owners on policy content, and ensures relevant and proper communication of policy efforts to external stakeholders.



Management, employees and contract workers across VusionGroup are responsible for adhering to this policy. This means complying with the letter and spirit of the policy. They must engage and take responsibility for ensuring that all initiatives are developed in line with the policy.

All incidents (perceived or actual violations of this policy or adverse human or labor rights impacts, or ethical concerns) will be reported without delay as set out in VusionGroup's [Whistleblower Policy](#), also stated above.

Authorized by the Chief Executive Officer, VusionGroup