

**GROUP CORPORATE  
SOCIAL AND  
ENVIRONMENTAL  
RESPONSIBILITY**

**2021-2022**



# STATEMENTS

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## GROUP CORPORATE SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

**2021-2022**

This document is a reproduction of Chapter 6, as well as pages 12 and 13 of Chapter 1 of the Universal Registration Document 2021-2022. The original French version of the Universal Registration Document was filed with the *Autorité des marchés financiers* (AMF, French Financial Markets Authority) on October 31 2022 under number D. 22-0788 in accordance with Article 212-13 of the AMF General Regulations.

All documents are available on the Company's website at [www.claranova.com](http://www.claranova.com).

In this Document, the term "**Group**" refers to Claranova and its subsidiaries, while the terms "**Claranova**" and the "**Company**" refer to Claranova as an entity.

This Document contains information about the Company's objectives and development strategy. Such information may be identified by the use of the future and conditional tenses and by forward-looking terms such as "consider", "envisage", "think", "target", "expect", "intend", "should", "aim", "estimate", "believe", "wish" and "may" or, in certain cases, the negative form of these terms, or similar expressions.

The reader's attention is drawn to the fact that these objectives and development strategy depend on circumstances and events which may or may not occur.

These objectives and development strategy are not historical data and should not be considered to give any assurance that the stated events and data will occur, the assumptions confirmed, or the objectives attained. By their nature, these objectives may not be achieved and the statements and information presented in this Document may prove incorrect, without the Company being required in any way to provide an update, subject to applicable regulations and, particularly, the AMF General Regulations.

This Document also contains information about the Company's business and the market and industry in which it operates. This information notably stems from studies conducted by internal and external sources (analysts' reports, specialized studies, sector publications, and any other information published by market research firms, companies and government agencies). The Company considers that this information presents a true and fair view of the market and industry in which it operates and accurately reflects its competitive position. However, while this information is considered reliable, it has not been independently verified by the Company.

*The English language version of this report is a free translation of the original document prepared in French. Only the French version of the Universal Registration Document has been filed with the AMF. It is therefore the only legally binding version.*

This non-financial report sets out Claranova's responsible approach towards all its internal and external stakeholders.

It presents, in particular, the non-financial risks facing Claranova with regard to its business model presented in Chapter 7 of this document, and the related policies, approaches and performances. In this respect, it meets the requirements set out in Order No. 2017-1180 of July 19, 2017 and Decree No. 2017-1265 of August 9, 2017 introducing a Non-Financial Statement (NFS), as detailed in Articles L. 225-102-1 and R. 225-105 et seq. of the French Commercial Code (Code de commerce).

In addition to providing information on major non-financial risks, it also describes Claranova's approach to its key corporate, social and environmental responsibilities (CSR), i.e.:

- those which are most important to its stakeholders;
- those with the greatest impact on the Group's business.

For these risks and challenges, Group Management has selected data and indicators that are published in this report, taking account of their relevance and effectiveness in reporting on the Group's CSR approach. They are reassessed annually and on changes in the Group's scope.

In light of the nature of Group's activities, management does not monitor the following CSR areas: food wastage, food insecurity, tax evasion, animal well-being, responsible, equitable and sustainable food practices and the circular economy.

## 1 Our responsibility

### 1.1 Our CSR approach

#### Strong growth and high societal expectations

Claranova has remained faithful to its values as a responsible corporate citizen despite the unprecedented market backdrop marked by the war in Ukraine and the marketing challenges experienced by the PlanetArt division. Revenue of €474 million was driven by a diverse business portfolio and the agility and expertise of its teams.

This responsibility increases as the Group continues to grow and in line with stakeholder expectations. To support its growth, Claranova has developed a structured approach to Group CSR.

#### Developing a Group CSR approach

Claranova applies a CSR approach designed to generate growth and profitability that can be shared with stakeholders. Since 2019, the organization of Claranova's CSR approach at the Group level has involved:

- analyzing its CSR risks (See paragraph 1.2);
- developing new CSR key performance indicators;
- creating CSR guidelines and a reporting tool;
- creating and mobilizing a network of CSR officers.

Claranova is committed to ongoing progress in its CSR approach. The Group will continue to strengthen CSR governance practices by developing new policies and deploying action programs, focusing in particular on environmental issues and vigilance.

### 1.2 Our CSR risks

#### Major CSR risk identification methodology

In 2020, Claranova created a CSR Risk Assessment Committee comprised of members from the Finance, CSR, Legal, Communications, Operations and Data Protection departments. In 2020, this Committee developed the CSR risk assessment method and map which was updated in 2021. In 2022, this risk map was re-validated in accordance with the revised Group risk map.

The two scales for rating respectively the severity of impacts and their frequency of occurrence are based on quantitative

and qualitative assessment criteria. Each scale comprises four levels. The severity rating scale includes impacts on:

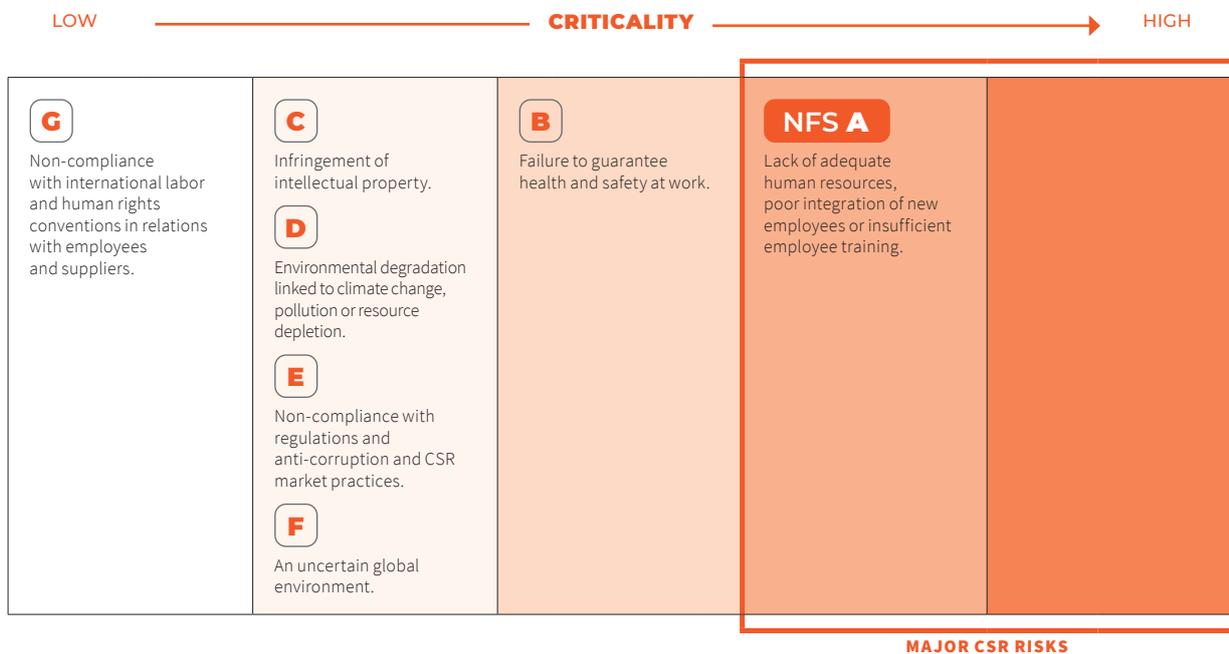
- financial results and the Group's ability to finance its activities;
- customer relations and the impact on revenue;
- human capital and the impact on employee engagement;
- relations with stakeholders and the costs of remediation or repairs.

The Committee established and updated a list of CSR risks based on an analysis of Group businesses, the publicly reported risks within its competitive universe, its business model and its interactions with stakeholders. The Committee also ensures consistency between the respective universes of Group (See Chapter 4 of the Universal Registration Document 2021-2022) and CSR risks. Committee members then produced a description and analysis of each risk: its nature and potential manifestations, factors relating to Claranova's business model and the Group's relations with stakeholders, its potential impacts for the Group and its stakeholders and the probability and frequency of occurrence. They also took into account existing policies and processes in the Company that could help control some or all of the risk or its consequences for the Group and its stakeholders.

Finally, the Committee has updated the method for rating net CSR risks with respect to impact and frequency for Claranova and its stakeholders. The development of this rating was based on a consensus building approach. In the event of diverging conclusions for short, medium and long-term timeframes, or depending on the assessment criteria, the Committee took a prudent approach by adopting the highest rating. In 2021, Claranova included risks related to the protection of IT systems and personal data protection in the Group's risk map (See Chapter 4 of the Universal Registration Document 2021-2022).

The CSR Risk Assessment Committee will meet annually to update the CSR risk mapping.

## CSR risk mapping



Claranova's rating system identified one major CSR risk:

**NFS A** Lack of adequate human resources, poor integration of new employees or insufficient employee training.

## Presentation of risks

**[Risk A]: Lack of adequate human resources, poor integration of new employees or insufficient employee training.**

Claranova's employees are its prime creators of value. Their technical and managerial expertise, impressive execution capacity and collective commitment are Claranova's most important asset. It is their capacity to innovate and take new technologies forward, both operationally and competitively that drive Claranova's growth and profitability.

Claranova is attentive to the risks of insufficiently skilled and motivated employees. The development of its three divisions requires technical experts and talented managers able to keep pace with the Group's accelerated growth. During the remote working period it was difficult to integrate and train new employees. During such periods, new balances between private and work life and individual and collective activities must be developed accompanied by a long-term assessment on new working methods. A slowdown in the development of human resources (employee recruitment, integration, training and retention) or in individual or collective employee commitment or motivation would have an adverse effect on Claranova's earnings in the short to medium term. All stakeholders would be affected by a decrease in Group growth.

**[Risk B]: Failure to guarantee health and safety at work**

Claranova's teams of highly competent and committed professionals are its most important asset. Guaranteeing their health and safety is therefore a key priority for the Group. A failure in this major area would be detrimental to the Group. Given the marginal place of product manufacturing in Claranova's activities, the main health and safety risks primarily concern burnout, stress or musculoskeletal disorders. Claranova's growth is a product of the individual and collective efforts of its employees. A serious health or safety incident would adversely affect their well-being, motivation and commitment to the common project and, in so doing, reduce Group's growth momentum.

**[Risk C]: Infringement of intellectual property**

Claranova owns strong brands and intangible assets created by its IT developers and underpinning its growth in new markets and new regions. For that reason it is attentive to the risk of misappropriation of its brands or violation of its intellectual property rights. An infringement of the Group's intellectual property rights could lead to litigation while the fraudulent misappropriation of software could result in a loss in sales.

**[Risk D]: Environmental degradation linked to climate change, pollution or resource depletion**

Claranova is fully aware of the risks of climate change, environmental pollution and resource depletion which currently concern all human activities and monitors developments in this area. The Group also considers that environmental responsibility provides an opportunity for innovation and growth. The Group's environmental impacts mainly relate to

photo printing and the production of personalized products by third-party partners and their delivery. Poor control over these impacts would damage both Claranova's image and its commercial development and would likely trigger a loss in interest or even the rejection of Claranova by its stakeholders.

**[Risk E]: Non-compliance with regulations and anti-corruption and CSR market practices.**

Due to its international dimension and growth across all its markets, Claranova is exposed to the risk of corruption and failure to meet its corporate, social and environmental responsibilities (CSR), like any other company. A failure would lead to a loss in confidence by third parties, adversely affect Claranova's image and generate potential remediation costs.

**[Risk F]: An uncertain global environment**

Claranova does not exclude the materialization of a risk of a natural disaster, a health crisis or political upheaval. Such crises affect the private life and health of its employees and customers in addition to having a financial and stock market impact for the Group. However, Claranova's business model is largely based on office activities, without manufacturing.

**[Risk G]: Non-compliance with international labor and human rights conventions in relations with employees and suppliers**

Due to its global presence, Claranova does not exclude the risks of failure to comply with rules for protecting human rights or good labor law practices, and particularly cases of discrimination, contrary to its wishes and despite policies in place. This would result in the violation of the dignity and fundamental rights of the victims which could negatively impact the Group's image and stakeholder confidence.

**NFS TABLE**

Business model	CSR risk mapping	Main CSR risks	Reasonable policies and procedures	Performance indicators
See Chapter 7	Major CSR risk identification methodology (See paragraph 1.2) CSR risk mapping (See paragraph 1.2)	Lack of adequate human resources, poor integration of new employees or insufficient employee training. <b>NFS A</b>	Employment (See paragraph 2.1) Training and career support (See paragraph 2.2)	Total workforce (See paragraph 2.1) Number of training hours (see paragraph 2.2) Average number of training hours per employee (See paragraph 2.2)

## 2 Being a responsible employer

The Claranova group can only succeed with the support of all the employees of its subsidiaries. Its employees are in consequence among its most valuable assets. And by promoting their personal growth as stakeholders in the Company's long-term project, it also contributes to the Group's success. In this regard, Claranova Management is

convinced that good working conditions, skills and career development, recognizing talent, fair treatment, and equal opportunity are vital to the success of the Group's strategic plan. These practices are vectors for the innovation, responsiveness, reliability and expertise that benefit our customers.

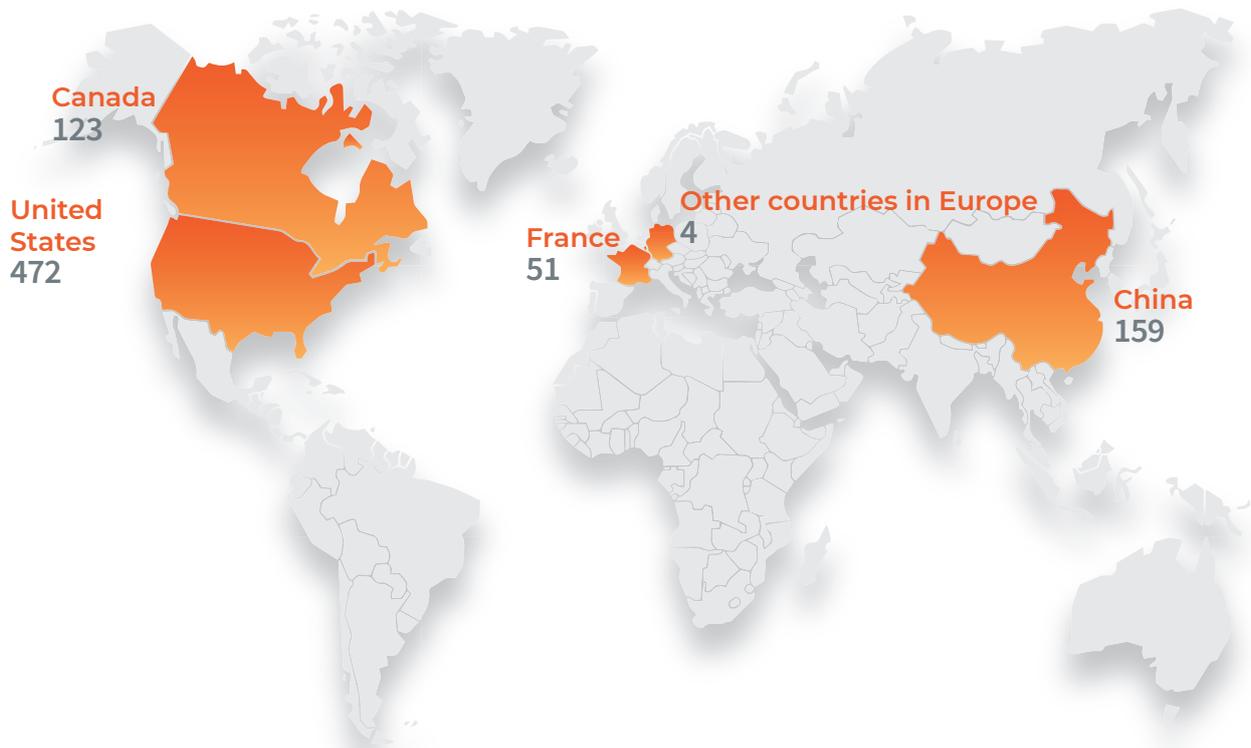
### 2.1 Employment, integration and recruitment for diversity NFS A

#### Employment

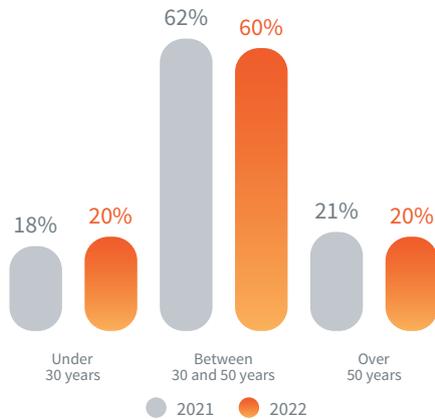
The number of employees at the end of June 2022 rose slightly (+ 1.9%) in relation to the end of June 2021.

The personalized e-commerce business experiences a sales peak during the end-of-year holiday season (Thanksgiving, Halloween, Black Friday, Christmas) and large numbers of temporary staff are hired to help the Company provide the best customer service possible.

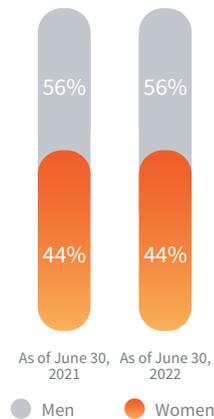
#### GEOGRAPHIC BREAKDOWN



## AGE



## GENDER EQUALITY



## TOTAL HEADCOUNT



## Working hours

**Widespread home working from spring 2020 due to the COVID-19 pandemic is not included in the FY 2019-2020 and FY 2021-2022 key performance indicators.**

A proper use of mobile tools helps achieve a good work-life balance. These tools help to improve the quality of life at work by giving workers more flexibility in the management of their schedules.

One out of four employees of the Group currently works on a remote basis. In Germany for example the subsidiary allows all employees to work from home one day a week. In Canada, senior executives and management exercising team leadership responsibilities are able to work remotely three days a week while their teams are able to work remotely as much as they like while encouraged to maintain in-person contacts so important to ensuring a shared corporate culture. Finally, in France working from home on a periodic basis is a widespread practice, while some employees even work remotely full-time.

**KEY PERFORMANCE INDICATORS** (excluding widespread recourse to remote working in FY 2019-2020 and FY 2021-2022 due to COVID-19)

	FY 2019-2020	FY 2020-2021	FY 2021-2022 <sup>(1)</sup>
Employees working part time	1%	2%	1%
Employees working from home	8%	5%	25%
• Employees working from home full time	6%	4%	10%
• Employees working from home part time	2%	1%	15%

(1) Scope: all subsidiaries except the American entity myDevices

The 20 point increase in remote working in one year reflects the adoption of the Remote Working Charter in France and remote working practices in the US and Canada.

As in previous years, part-time work remains marginal (1% of the workforce).

Except for compliance with national regulations, there are no standardized practices concerning overtime and work performed on weekends or statutory holidays. Local managers are encouraged to avoid overtime, except in exceptional cases.

## Diversity

Fair treatment and equal opportunity are fundamental values for the Group. Claranova does not tolerate any inequality of treatment based on discrimination, in accordance with the French Labor Code<sup>(1)</sup>. By cultivating diversity, the Group creates value and fosters innovation.

Over and above compliance with regulations, Claranova promotes measures in favor of:

- parenthood and gender equality;
- intergenerational transmission of know-how;
- integration and continuing employment of people with disabilities.

The Group also promotes the complementarity of cultures. This is essential for Claranova, which, as a French company with an international presence, earns more than 90% of its revenue outside France. Group entities favor expertise and development potential on recruitment to encourage team diversity.

Each year, the Group's Board of Directors confirms continued action in these priority areas. Systems are implemented in the subsidiaries, in line with local expectations and challenges.

### Parenthood and gender equality

Claranova supports parenthood and promotes gender equality. The Group does not tolerate stereotypes which continue to exist in the digital sector. In a climate of confidence between the Company and its employees, Claranova integrates parenthood imperatives in the organization of work time. The ability to occasionally work from home, for example, is explicitly proposed as a way of improving the work-life balance. In accordance with French regulations, maternity and paternity are not an obstacle to promotion. Quite the contrary, Claranova recognizes that one of its duties is to support parenthood by ensuring that promoted staff are able to assume their roles as parents. Claranova is also attentive to strengthening the role of women through recruitment. 44 % of our employees are women.

## 2.2 Training and career development NFS A

### Training

The personal qualities of our employees, their ability to innovate and execute are the Group's main growth drivers. Operating in a constantly changing technology sector, for Claranova employee training and skills development at its subsidiaries represent priorities. Each person deploys its own training approach founded on a dual objective: considering each employee as an actor in his or her own career path and sharing the internal knowledge and strategic vision of each subsidiary.

### Intergenerational transmission of know-how

Claranova Group has developed and maintained know-how in all its areas of activity for many years: a precise understanding of all digital technology sectors (Software, Photo printing, Internet of Things), an ability to innovate in any technological sector, with new products, services and technologies, as well as the ability to implement a variety of different models, by finding the right business model, from a new concept. Through their organization and collaborative working methods, Claranova's teams are committed to transferring their know-how, particularly to the younger generation, through work-study programs and apprenticeships across all areas of activity. As an example, Claranova in France has five to six trainees on a permanent basis.

### Integration and continuing employment of people with disabilities.

Claranova's disability policy promotes job integration and the continuing employment of people with disabilities, in compliance with the legal requirements applicable in the countries where the Group's subsidiaries operate.

In France, for example, job offers expressly indicate the policy of non-discrimination in employment for people with disabilities.

For several outsourced services, the Group's head office calls on sheltered-sector or job-integration companies. The annual office cleaning collects computer equipment and data storage devices. This equipment is either recycled or securely destroyed by a disabled-friendly company committed to sustainable development. Paper collection and recycling is also managed in part by job-integration companies. Moreover, for many years now, the packaging of certain products distributed or produced by Avanquest Software in France has been chiefly handled by a work-based support organization (ESAT).

Claranova encourages each employee to take a proactive approach to training. This means that each employee must take the initiative in submitting their training requests to be formulated on a day-to-day basis or during individual annual evaluations. Meetings are held monthly between Avanquest Management and employee representatives in France and a specific meeting focusing on the economic and social database, including the training plan, is organized annually.

(1) Pursuant to Article L. 1132-1 of the French Labor Code: "No individual may be excluded from a recruitment process or denied access to an internship or training period in a company, and no employee may be sanctioned, dismissed or be the subject of discriminatory measures, directly or indirectly, as defined in Article 1 of French Act<sup>n</sup>2008-496 of May 27, 2008 concerning various measures to adapt community law designed to combat discrimination, notably in terms of compensation, within the meaning of Article L. 3221-3, profit-sharing or share-based compensation, training, reclassification, posting, qualification, classification, professional promotion, transfer or contract renewal based on their origin, gender, customs, sexual orientation, gender identity, age, family situation or pregnancy, genetic profile, a particular vulnerability resulting from their economic situation, apparent or known to the perpetrator, actual or assumed affiliation/non affiliation with a specific ethnic group, nation or race, their political opinions, union or mutualist activities, elective office, religious convictions, physical appearance, their family name, place of residence or bank account, or because of their state of health, loss of autonomy or disability, or ability to express themselves in a language other than French."

Avanquest in France assessed its employees' needs with respect to training in FY 2021-2022 to guide future training programs and promote the development of skills and employability.

In Canada, employees are regularly invited to "lunch & learn" sessions to share their knowledge. These lunches cover a range of subjects, from management to strategy. Internal seminars are also proposed throughout the year by Group

experts. In addition, half a dozen workshops are held each year by external experts. New recruits participate in personalized welcome session tailored to their job. All employees are encouraged to follow e-learning courses throughout the year to acquire new or maintain existing expertise. Finally, employees can request external training courses adapted to their requirements.

## KEY PERFORMANCE INDICATORS

	FY 2019-2020 <sup>(1)</sup>	FY 2020-2021 <sup>(1)</sup>	FY 2021-2022
Number of training hours	850	880	1,746
Average number of training hours per employee	4.43	4.71	9.81

\* Restated data.

Adjusted scope: all subsidiaries except the United States and China.

In FY 2021-2022, the number of training hours has nearly doubled. This increase reflects the resumption of the training program in Canada and France after a two-year interruption caused by the health crisis, as well as an acceleration of existing programs.

## Career development

In these constantly changing digital and technology sectors, Claranova seeks to conserve the excellence of its employees and attract new talent, both young and experienced, to support its growth. For that reason, Claranova proposes attractive career opportunities and encourages employees

to design their own career development projects and paths for advancement within their subsidiary. In this same spirit, at the Group level, Claranova supports internal promotions, personalized career paths, annual performance reviews and the creation of clearly documented job descriptions.

## 2.3 Health and safety at work

### Occupational health and safety prevention

Health, safety and quality of life at work are a priority for Claranova, with protecting its employees a constant concern. The Group adopts a preventive approach as part of its responsibility to employees and its belief in the effectiveness of precautionary measures.

Management of the Group's subsidiaries have identified the main health hazards to which employees are exposed. They concern workstations, the use of screens and office activities and mainly include stress, psychosocial risks and musculoskeletal disorders.

Committees have been set up in France and the United States to prevent these risks. In Germany, they are monitored by a health and safety officer.

Claranova is committed to preventing psychosocial risks. Management encourages all employees to contribute to the Group strategy and seeks to ensure they have the necessary resources to accomplish their role.

A health insurance plan is offered to full-time employees in all Group subsidiaries.

In Canada, Claranova provides employees access to the services of an external company that proposes an integrated approach to mental, physical, social and financial well-being. Each employee is entitled to five sessions per year with a

psychologist, lawyer, psychotherapist, dietician, etc. Sports memberships are also reimbursed according to a flat rate amount.

In France, identified stress factors include the fast pace of the Group's growth, working with subsidiaries in different time zones, the quantity of information processed and the workload. Claranova takes these factors into account individually and with compassion. Following the COVID-19 pandemic, Claranova in France sought to facilitate its employees' return to the workplace by placing an emphasis on achieving a healthy work-life balance. Developed in partnership with its employees, this Charter on the right to disconnect, seeks to ensure that rest and vacation time are respected, the proper balance between professional, personal and family life is maintained and employee health is protected. To this purpose, it defines working hours and periods for disconnection, issues recommendations to prevent information overload, defines the employer's commitment and employee awareness initiatives and establishes a whistleblowing right.

France resumed fire safety and first aid training in 2022, after being interrupted the last two years by the pandemic. Avanquest in France also intends to develop a training program to combat harassment.

## KEY PERFORMANCE INDICATORS

	FY 2019-2020	FY 2020-2021	FY 2021-2022
Workplace accident frequency rate	1.72	0	0

Frequency rate (FR) = (number of accidents/hours worked) x 1,000,000.

## Resilience and pandemic and health crisis prevention measures

In response to the COVID-19 pandemic, Claranova continued to encourage remote working, adopted physical distancing practices and preventive measures in office areas in accordance with government recommendations: mask wearing, ventilation, disinfecting doorknobs and desks, etc.

Nearly all business travel was eliminated or postponed during lockdown periods and in the months that followed. The subsidiaries accompanied these measures with additional support for their employees.

## 2.4 Employee relations and compliance with conventions

### Promotion of social dialog

Claranova undertakes to encourage freedom of association and promotes social dialog taking into account the interests of all its subsidiaries' employees. Led by the human resources teams at local level, social dialog aims to respond as best as possible to the needs of employees, while complying with regulations, laws and local culture.

In France and Germany, formal meetings are held with employee representatives at the legally required intervals. For example, regular meetings are held in France between the Social and Economic Committee (SEC) and Management, offering meaningful interactive sessions during which all

issues may be examined and discussed. A collective agreement, covering the organization of working time and professional equality, was signed in December 1999, in compliance with French law on employee representation.

In Canada, employees can access a confidential and anonymous web platform. They are invited to freely share their opinion on all issues they consider important.

PlanetArt and Avanquest North America in the United States and China do not report to the Group on freedom of association and social dialogue.

### Compensation and employee shareholding

In FY 2021-2022, the Group payroll (salaries and bonuses, excluding employer social security contributions and expenses relating to share-based payments) amounted to €62.8 million. To promote employee commitment and motivation, individual wage increases are based on annual performance appraisals for each employee.

In France, Avanquest moved to overhaul of its compensation policy and structure in FY 2021-2022 to ensure consistent pay scales and pay equity for all employees and between men and women.

Restricted stock unit (actions gratuites) and stock option grants were introduced to motivate and build commitment in employees worldwide. In this way, a certain number of the Group's employees are shareholders of the Company or one of its subsidiaries.

## 3 Having a positive social impact

As a global Internet company, Claranova facilitates access to technologies by offering solutions that combine innovation and ease of use. The Group has a positive impact on society through the quality of its solutions and the

services it provides, for example in the areas of prevention and personal security by means of connected sensors. Claranova is also responsible for ensuring the security of personal data entrusted to it.

### 3.1 Simple and secure digital access

#### Innovation: a service for our customers and a benefit to society

Claranova implements an innovation policy to monitor market developments and customer needs. These innovations promote employment and social benefits with a focus on four categories:

- **Creation of new** products tailored to customer needs;
- **Incremental or breakthrough innovation.** Products are constantly improved in line with changes in Claranova's highly competitive markets and new services are created;
- **development of new models.** Claranova was notably behind a major breakthrough when it proposed the digitalization of photo printing and then developed smartphone access to this service.

- **Innovation in marketing and selling.** In the software business for example, the percentage of digital sales has increased from 10 % to 80 % in 10 years. Solutions previously sold primarily in stores can now be purchased together with maintenance contracts on a SaaS (Software as a Service) or PaaS (Platform as a Service) basis.

Claranova is also constantly innovating to improve its control of social media as well as constantly changing search engine algorithms and to develop its cross-selling techniques.

## Accessibility and safety: the social benefits of our solutions

With more than 500 software products available in up to 16 languages, Avanquest is one of the world's 10 leading consumer software developers. Avanquest designs simplified functionalities, offers wide price ranges and optimizes the functionality/price ratio of its software in order to make its solutions available to all, individuals, freelancers and small businesses.

It also helps extend the life of computers by providing a range of utility solutions to update and maintain IT tools. Antivirus software protects users and their personal data. Avanquest is also developing an innovative solution to protect Internet users that includes microphone and camera control, VPN and a priori reporting of potentially malicious Internet sites.

Finally, Avanquest helps its customers learn how to use the software. The customer support service identifies customers with potential installation problems who are contacted directly to propose solutions. Numerous tutorial videos are

shared with customers, both embedded in products or posted on social networks. The customer support service shares tips and best practices for using the software on social networks, on the Avanquest blog, the software's built-in chat functionality, and through private messaging in response to user requests.

The Group's IoT business constantly proposes new applications through its unique platform, myDevices, compatible with over 450 different connected devices. Among the current infinite uses, the majority present a recognized societal and environmental benefit. They improve consumption monitoring, product quality and the reliability of installations and much more. The IoT division's innovation also focuses on the myDevices platform itself, which Claranova wants to keep as scalable and secure as possible. In the Avanquest division, several software and services provide a line of defense against IT pirates, cyber-threats and malware, or increase the security of online payment systems.

## Personal data protection

Protecting personal data is a top priority for Claranova. On that basis, the Group implements compliance and personal data protection measures for its customers and employees in all its subsidiaries.

All subsidiaries address these issues with the support of a Data Protection Officer (DPO) located in France. This DPO works directly with the compliance and IT security managers as well as with the local Data Protection Coordinators (DPC) to ensure the Group's compliance with the General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA).

In different countries where the Group operates the DPO is assisted by a network of specialized lawyers to monitor regulations and compliance issues and provide regulatory guidance. The DPO performs technology and legal intelligence functions to ensure continuing compliance with the latest regulations and make them known within the Group.

The Group's IT charter integrates the issue of personal data protection. Since FY 2020-2021, all Claranova employees receive training and personal data protection as it relates to their respective areas. To confirm that the video module available online was correctly understood a questionnaire is validated.

The Group continues to audit software and websites for compliance with European and international privacy policies.

The Group also continues to audit certain subcontractors to verify their compliance with the GDPR.

The DPO contributes to implementing Binding Corporate Rules (BCR) designed to help subsidiaries apply common methodologies and procedures for processing and protecting personal data.

Finally, the subsidiaries are continuing to roll out their own roadmaps.

- intrusion tests on Group websites using payment systems;
- grouping together and encrypting their databases containing personal data in Europe for European residents;
- pooling personal data security tools in coordination with IT security, and sharing them throughout the Group to harmonize tools and methods;
- encryption for all communications/internal and external storage of personal data;
- informing employees of their rights regarding personal data protection.

In addition, the GDPR dedicated hotline team answers questions about personal data processing from private individuals within regulatory time periods (less than 30 days).

In FY 2022-2023, Claranova will maintain its efforts to ensure the effective control, security, auditing and transparency of its users' and employees' data.

## KEY PERFORMANCE INDICATORS

	FY 2019-2020	FY 2020-2021	FY 2021-2022
% of subsidiaries with a Data Protection Coordinator (DPC)	80%	80%	80%
% of subsidiaries covered by the GDPR risk mapping	100%	100%	100%
% of customer inquiries concerning personal data	2%	3%	0.38%

The percentage of customer requests for personal data was reduced tenfold this year after introducing tools allowing customers to delete their own data without requiring the intervention of support teams.

## 3.2 Fair practices and anti-corruption measures

Claranova and its managers are committed to preventing all forms of corruption and influence peddling in its commercial operations. Group management is implementing an anti-corruption program to anticipate and detect acts of corruption and influence peddling in France and other countries in accordance with Article 17 of the French Sapin II law<sup>(1)</sup>. Due to its rapid development and growth in recent years, Claranova group is only recently subject to these regulations.

In FY 2020-2021, Claranova developed its **corruption and influence peddling risk map**. Specific maps, for the head office and for each business unit, were produced by Claranova's Executive Management, the Legal Department, managers and employees on the basis of interviews and questionnaires. These cover on this basis all Group businesses, geographic areas and procedures.

Local analysis of gross and net risks focused on around 15 potential corruption instruments and controls with respect to implementation were assessed including notably gifts, invitations, facilitation payments, sponsoring activities, charitable works, favors on recruitment or the selection of service providers and suppliers, acts of corruption and

influence peddling performed by intermediaries, joint venture or consortium partners, contracts with multiple obligations, royalties, discounts and rebates, free gifts and sales, sales with right of return or repayment, merger-acquisition transactions and financial instruments. This took into account various quantitative data.

The risk map made it possible to develop remediation plans capable of being adapted to the level of residual risk. This risk map will be regularly updated.

Claranova continued to develop an Anti-Corruption Code of Conduct and an internal whistleblowing system, in accordance with the recommendations of the French Anti-Corruption Agency (AFA). The Code of Conduct is intended to provide a general framework for all Group employees on issues related to corruption, with specific and illustrative examples specifically designed to help develop a concrete understanding of the issues. The internal whistleblowing system will also ensure that each Group employee has a secure and independent framework to report any incident of corruption within the Group.

## 3.3 Regional, economic and social impact of the Company's business activities

### Outsourcing and supplier relations

Claranova Group's main suppliers are printers, software developers and logistics service providers.

Claranova gives preference to local suppliers whenever possible, particularly for general purchases. The Group also wishes to gradually incorporate environmental and social criteria in the selection of suppliers and service providers.

In France, for many years now, Claranova has called on the services of ESAT Suzanne Lawson, a sheltered-work organization managed by the Association des Papillons Blancs des Rives de Seine. This organization, which employs people with disabilities, performs a large amount of packaging work for

Avanquest Software. The Group's head office also outsources the recycling of its IT equipment (computers, magnetic media, batteries, etc.) to the sheltered services company, APR2, and the collection and sorting of its other equipment to Tricycle Environnement, a recycling company promoting inclusion and the return to employment. This year, the relocation of its French headquarters resulted in the collection of 20 tons of furniture for recycling, reuse or renovation, in addition to the regular recycling of waste and supplies. The partnership between Claranova's French headquarters and Tricycle Environnement provided 193 hours of work experience to four workers from the social and solidarity economy.

### Supporting community-based organizations and local education

As an engaged corporate citizen, Claranova concretely contributes to the regions where it operates through partnerships with the community-based organizations.

In France, this year's annual solidarity budget was allocated to the Abbé Pierre Foundation to combat homelessness and the CARE Foundation for humanitarian aid in Ukraine.

In Canada, Claranova is a member of the Children's Dream Foundation and each year, its subsidiaries fundraise in order to help children suffering from cancer realize their dreams. Avanquest has also supported the Cancer Research Society.

## 4 Limiting our environmental footprint

### 4.1 Managing the environmental impact of our business

The service activities provided by Claranova group subsidiaries have a limited direct impact on the environment, compared to industrial activities. On the other hand, technological innovation reduces, in certain activities, the environmental impact of products, their logistics chain or the activities of its customers.

In the medium-term, Claranova's goal is to develop a Group environmental policy in order to harmonize the practices of its subsidiaries in the area of responsible sourcing, manufacturing and shipping.

(1) Article 17 of Law No. 2016-1691 of December 9, 2016 on transparency, the fight against corruption and the modernization of the economy, also known as the Sapin II law.

## Climate change – Carbon footprint

Like all companies, Claranova has a duty to combat climate change. While its greenhouse gas emissions remain lower than those in industrial activities, the Group is nevertheless committed to monitoring and reducing its own carbon footprint. Greenhouse gas emissions are linked to producing and shipping personalized photo products sold by the PlanetArt division. The environmental impact of this division is largely indirect and depends mainly on its subcontractors, as the majority of the production and all shipping for this activity are outsourced.

Finally, because of the Group's international dimension which requires frequent meetings and exchanges with all subsidiaries and other stakeholders, travel represents one of the main environmental impacts. To reduce the impact of such meetings, the Group has adopted several rules of conduct:

- reduce travel in favor of videoconferencing and telephone meetings; and
- where this is not possible, the preference to travel by train.

### KEY PERFORMANCE INDICATORS

The travel agencies used in Europe measure the carbon footprint of each employee's business trips, and publish an annual report on CO<sub>2</sub> emissions:

	FY 2015-2016	FY 2016-2017	FY 2017-2018	FY 2018-2019	FY 2019-2020	FY 2020-2021	FY 2021-2022
CO <sub>2</sub> emissions relating to travel (kg CO <sub>2</sub> )	239,000	180,000	162,000	295,000	160,000	5,000	37,000

CO<sub>2</sub> emissions between FY 2019-2020 and FY 2020-2021 were significantly reduced by the interruption of travel in favor of video-conferencing during the COVID-19 pandemic. This year as well, most team, board and partner meetings were held through videoconferencing.

The level of CO<sub>2</sub> emissions is a selection criteria when renewing the vehicle fleet. No vehicles powered exclusively by fossil fuel have been ordered in the past four years, with preference given to hybrid and electrical vehicles, so henceforth the company's fleet is comprised solely of these latter vehicles. Electric car charging stations are in consequence available at the Group's headquarters.

In March 2022, the Group's French headquarters moved to new offices. Equipped exclusively with motion-sensor LED lighting, smart heating and air conditioning management, the building is HQE™ certified. This label recognizes the building's environmental performance, maintenance and upkeep and activities of its occupants. It also confirms a commitment to reduce consumption by precisely monitoring consumption and technical management of the building.

The environmental addendum to the lease for these new premises, more commonly referred to as the green lease, establishes a partnership between Claranova and its lessor to evaluate energy consumption and implement an energy savings program.

Energy consumption, energy efficiency and the use of renewable energy remain a key challenge for Claranova. Fluctuations in energy consumption depend largely on the air conditioning used in the server room. It is not possible to monitor this metric on a global basis. At this stage, each subsidiary adopts its own measures and tracks its own indicators.

## Other environmental impacts of our activities

The Group does not produce or sell any toxic products. Moreover, the services provided are located in offices, with very limited risks in this regard. Most of the Group's environmental impacts are indirect, generated by subcontractors who manufacture and distribute the products of the PlanetArt division.

At this stage, the Group has no formal environmental policy and has not taken any steps towards environmental certification. No site-specific or consolidated data are available in the absence of a centralized data collection system.

Nonetheless, Claranova monitors the environmental impact of its own activities. In this respect, the majority of the Group's servers are hosted by Amazon Web Services (AWS) or Microsoft (Azure), powered entirely from renewable energy sources. The Group also attaches considerable importance to the environmental impact of its suppliers during the selection process, notably by giving preference to FSC® certified suppliers when the offering is available, which is the case for the majority of the paper sales by Avanquest and above all for PlanetArt's photo printing and photo album activities in Europe.

## 4.2 Factoring in the environmental impact of our activities

The Group also pays considerable attention to environmental impact when selecting suppliers, and in particular hosting service providers or printers. Because PlanetArt's production and shipping are outsourced, the environmental impact of this business is largely indirect and for the most part dependent on subcontractors. The migration of selected Avanquest software to the SaaS model means that software no longer needs to be installed on one's computer and can be operated entirely on the web. And by adopting PaaS and SaaS solutions, the customer pays only for the amount of

services actually used. The number of software services leased is thus adapted to the number of users in real time. As a result, when this number decreases, so does the number of subscriptions. This means that energy consumption related to data storage and downloading remains proportional to the level of software usage. The myDevices solutions contribute to a better resource use, waste and emissions reduction and a longer equipment life. Measuring these impacts enhances the environmental management of business and is being extended to more and more activities.

## Internet of Things: solutions to reduce our customers' environmental impact

The **myDevices platform**, Claranova's IoT activity, simplifies the management of connected devices for professionals. This platform is based on a catalog of **over 1,000 connected devices** produced by 175 different manufacturers. It enables companies of all sizes to connect and interact with their pool of connected devices, irrespective of the type of sensor, its manufacturers or the communication network used (LoRaWan, Sigfox, Bluetooth, 5G, NB IoT, LTE-M, etc.). The myDevices platform offers a quick and easy way to deploy an infinite range of IoT solutions in any business sector (hospitality, retail, manufacturing, chemicals, agriculture, logistics, services, etc.) or application field.

myDevices' IoT solutions and connectivity contribute to a better environmental management of economic activity and facilitate reporting of company energy data. In particular, they make it possible to monitor and analyze consumption based on activity and occupancy data, extend equipment service life, ensure the proper functioning of servers, rationalize travel, etc. These functionalities and mixed applications offer concrete environmental benefits:

- energy efficiency;
- the reduction of greenhouse gas emission;
- optimization of water consumption;
- better use of resources;
- the reduction of waste.

**Occupancy measurements and presence detection capabilities** ensure the accurate account of the actual occupancy of a given space (office, meeting room, etc.). This makes it possible to analyze data on consumption or define a service policy, in particular for cleaning, according to the level of use. The **occupancy measurement application** also facilitates compliance with health standards and identifies the occupancy rate of company spaces, a particularly useful feature in a period of remote working practices in order to adapt services to usage and occupancy, and to manage building operations based on data (cleaning, heating, lighting, etc.).

The **meter reading** solution provides for online metering and facilitates the declaration of consumption data on the ADEME platform. A sub-metering functionality identifies major consumption aggregates, and analyzes the consumption data with respect to data from the occupancy and luminosity sensors.

Remote real estate **management helps optimize maintenance interventions**, communicate good practices to occupants through detailed reporting, and detect leaks.

With SimplySense (temperature monitoring) a **connected cold room** allows a restaurant manager to act very quickly when there is a breakdown, preventing the loss of foodstuffs stored. In addition, food safety is improved by ensuring cold chain continuity which is more reliable than one-off or manual verifications. Monitoring the humidity and temperature of a datacenter helps prevent costly repairs or replacement of equipment in case of failure.

The **predictive maintenance of industrial equipment** gathers data on the performance of industrial equipment (such as hydraulic pumps in water treatment plants) and produces a dashboard on the state of operation of the various machines. By foreseeing breakdowns before they occur, this solution allows systems to be kept in optimal working order.

**Air quality** monitoring solutions (remoteaq.com) are in particular demand for public areas, such as schools. These provide real-time information on air quality and the containment level: temperature, hygrometry, rate of CO<sub>2</sub> and volatile organic compounds (VOCs). Through these indicators, it is possible to adopt corrective measures when necessary to ensure good air quality.

Finally, connected rodent traps placed in grain warehouses, for example, can be used to detect the rodent populations before they attain sizes that are difficult to manage, offering a **non-toxic solution of fighting infestations**.

## 5 EU Taxonomy Indicators

### 5.1 General background and scope for FY 2021-2022

In 2018, the European Commission launched the Sustainable Finance Action Plan (SFAP) establishing a framework to encourage sustainable investments in the European Union, to achieve the goals of the European Green Pact and a carbon neutral Europe by 2050. In June 2020, the European Parliament adopted Regulation (EU) 2020/852, known as the European Taxonomy, as part of this broader effort. As a company registered and headquartered in the European Union, this new regulation thus applies to Claranova. The European Taxonomy is a system for classifying economic activities according to their contribution to six environmental objectives:

- climate change mitigation;
- climate change adaptation;
- sustainable use and protection of water and marine resources;

- transition to a circular economy;
- pollution prevention and control;
- protection and restoration of biodiversity and ecosystems.

According to Article 8 of the Climate Delegated Act formally adopted in 2021, for the first year of the European Taxonomy's application, disclosure of key performance indicators is required only for the first two objectives relating to climate change. This delegated act defines the content, required information and calculation method for the indicators associated with this disclosure. For this first year of application, indicators required are limited respectively to the percentages of revenue, capital expenditure (CAPEX) and operating expenditure (OPEX) associated with EU Taxonomy-eligible economic activities and covering FY 2021-2022 without comparative data for FY 2020-2021.

An economic activity is eligible when explicitly described in the list included at this stage in the Regulation and likely to contribute substantially to at least one of the 6 environmental objectives. Whenever these activities comply with the technical screening criteria cause no significant harm to any of the other environmental objectives and comply with the

minimum social safeguards that will be defined by the European Commission, they will be considered as aligned EU Taxonomy-aligned. In accordance with the current timetable for implementing the Regulation, analysis of the proportion of Taxonomy-aligned activities will be reported at a later date, based on indicators for FY 2022-2023.

## 5.2 EU Taxonomy indicators methodology

### Key methodological steps to identify eligible revenue

Among the 13 sectors listed in the first version of the EU Taxonomy, we identified two revenue generating business lines at Group level:

- Information and communication:
  - Activity 1: Data-driven solutions for GHG emissions reductions (climate change mitigation, Activity 8.2);
- Professional, scientific and technical activities:

- Activities 2: Professional services related to energy performance of buildings (climate change mitigation, activity 9.3).

These two activities are exercised by the myDevices division. Based on the total weight of this activity in the Claranova Group's consolidated revenue (less than 1% of FY 2021-2022 consolidated revenue), these activities are deemed non-material at the Group level. The impact of these two activities on the Group's revenue will be regularly reassessed.

### Main methodological steps for identifying eligible operating expenses

Operating expenses for Taxonomy-eligible economic activities include only the following types of direct costs not capitalized as assets:

- research and development;
- building renovation measures;
- short-term leases (less than one year in accordance with IFRS 16);
- maintenance and repair;
- any other direct expenditures relating to the day-to-day servicing of assets of property, plant and equipment by the Undertaking necessary to ensure the continued and effective functioning of such assets;
- training and other human resources adaptation needs.

The other indirect costs such as general expenses, sale, marketing or administration costs, staff costs and depreciation and amortization are excluded from eligible operating expenses.

The delegated act defines three types of operating expenses to be considered as potentially eligible:

- operating expenses related to assets or processes associated with EU Taxonomy-eligible economic activities;
- operating expenses part of the capital expenditures plan to expand EU Taxonomy-eligible economic activities or allow EU Taxonomy-eligible economic activities to become Taxonomy-eligible within a predefined timeframe;
- operating expenses related to the purchase of outputs from EU Taxonomy-eligible economic activities.

As eligible economic activities are not significant at the Group level as indicated above, the assessment of EU Taxonomy-eligible economic activities has focused on those measures that may have an impact on the operating expenses mentioned above.

### Key methodological steps to identify eligible capital expenditures

EU Taxonomy-eligible capital expenditures, are defined as additions to tangible and intangible assets during the year under review, depreciation, amortization and any remeasurements accounted in compliance with relevant IAS and IFRS standards.

The delegated act defines three types of capital expenditures considered as potentially eligible:

- capital expenditures related to assets or processes that are associated with EU Taxonomy-eligible economic activities;
- capital expenditures that are part of a plan to expand EU Taxonomy-aligned economic activities or allow EU Taxonomy-eligible economic activities to become EU Taxonomy-aligned within a predefined timeframe;

- capital expenditures related to the purchase of output from EU Taxonomy-eligible economic activities, and individual measures enabling the target activities to become low-carbon or to lead to greenhouse gas reductions, (...) provided that such measures are implemented and operational within 18 months.

Among the 13 sectors of the EU Taxonomy, two categories of capital expenditures have been identified as relevant:

- section 6: Transport (long-term vehicle leasing);
- section 7: Construction and real estate (long-term offices and building leasing).

## 5.3 Quantitative indicators

### Eligible revenue for FY 2021-2022

Eligible revenue represents the proportion of Claranova's revenue-generating activities that are EU Taxonomy eligible (See paragraph 5.2).

Claranova's EU Taxonomy-eligible revenue for FY 2021-2022 is zero.

### Eligible operating expenses for FY 2021-2022

Eligible capital expenditures represent the proportion of Claranova's operating expenses that are EU Taxonomy eligible (See paragraph 5.2).

<i>Economic activities</i>	<b>Capital expenditures</b> <i>(in € million)</i>	<b>Percentage of total capital expenditures</b>
A. EU Taxonomy eligible activities	0	0%
Construction and real estate	0	5%
<i>Transport</i>		
A. EU Taxonomy non-eligible activities	2	95%
<b>TOTAL (A+B)</b>	<b>2</b>	<b>100%</b>

It should be noted that these are capital expenditures in EU Taxonomy eligible activities, whether or not produced by the Group (this includes, for example, car rentals, even though

Claranova does not generate transport revenues). Capital expenditures from the Group's eligible revenue-generating activities (Activities 1 and 2) for the period are not significant.

### Eligible operating expenses (OPEX) for FY 2021-2022

In FY 2021-2022, total EU Taxonomy eligible operating expenses represent less than 10% of the Group's total consolidated operating expenses. For that reason, the

Company has applied the materiality exemption provided for under European Taxonomy rules and chosen not to present this indicator.

## 6 Methodology

Corporate social responsibility data or non-financial indicators are reported by all Group entities (presented in note 3.2 "Scope of consolidation as of June 30, 2022" in Chapter 2 of the Universal Registration Document 2021-2022) to Executive Management, which centralizes this information. In line with the Group's decentralized organization model, the data is not always consolidated as the regulations and definitions (notably for employment-related information) can vary between regions. Operational effectiveness at a local level is prioritized.

As a result of its central role and direct links with the Human Resources Department and other Operational Departments of the Geographical Entities, Group Executive Management is ideally positioned to collect and verify the data circulated by the local entities. It provides a list of the data and indicators to be supplied.

Employment-related, environmental and social data is requested from the subsidiaries each year by Group Management at the end of each fiscal year. Data consistency (compared with data from prior years and financial management data) is verified locally and then centrally.

## 7 Business model

As a diversified global technology company, Claranova manages and coordinates a portfolio of majority interests in digital companies with strong growth potential. Supported by a team combining several decades of experience in the world of technology, Claranova has acquired a unique know-how in successfully turning around, creating and developing innovative companies.

### Our Expertise



### Our Strategy



claranova™



#### Technological excellence

Claranova's management teams combine decades of experience in the world of technology, entrepreneurship and investing in digital companies



#### Skill in execution

Claranova's success is based on a unique expertise in turning around, creating and developing innovative technological companies with potential for worldwide growth



#### Managing strong growth

With a nearly five-fold increase in revenue in seven years, Claranova has a successful track record of developing in a high-growth environment both organically and by integrating new businesses worth several tens of millions of euros



#### A DNA of value creation

Claranova relies on the very best technology, develops innovative value propositions and identifies the relevant business models to rapidly create lasting value.

### A strategy for investment and creation of value based on 3 pillars:

#### 1. Creating and identifying undervalued assets

- In the technology sector of high potential vertical markets
- In digital services created or acquired capable of being deployed at a worldwide level
- Based on freemium business models with strong recurring revenue potential
- Largely focused on B2C

#### 2. Creation of operating and financial value

- Strategic and operational redeployment
- Through organic growth or acquisitions
- Strategic, commercial or financial partnerships

#### 3. Externalization of value created

- Investment horizon of 5 to 10 years, varying according to the maturity of the asset and the opportunities identified to maximize the value created
- Wide range of options for externalizing value: IPO, partial or total sale to financial or industrial investors, merger, etc.

With annual revenue of €474 million in FY 2021-2022, Claranova has proven its capacity to turn a simple idea into a worldwide success in just a few short years. Present in approximately 15 countries and leveraging the technology expertise of its 800+ employees worldwide, Claranova is a truly international company, with 95% of its revenue derived from outside France.

Claranova's portfolio of companies is organized into three unique technology platforms operating in all major digital sectors. As an e-commerce leader in personalized objects, Claranova also stands out for its technological expertise in software publishing and distribution and the management of the Internet of Things, through its PlanetArt, Avanquest and myDevices businesses. These three technology divisions share a common vision: empowering people through innovation by providing simple and intuitive digital solutions that facilitate everyday access to the very best of technology.

## Our Business Portfolio



## Our Value Creation

### One Group, three technology platforms

**PlanetART**<sup>®</sup>  
YOUR WORLD. PERSONALIZED.

**E-COMMERCE OF  
PERSONALIZED OBJECTS**

 **Avanquest**

**SOFTWARE PUBLISHING  
AND DISTRIBUTION**

**myDevices**

**IoT  
MANAGEMENT PLATFORM**



#### For growth

- FY 2021-2022 revenue: €474m
- EBITDA: €26m
- A cash position of €100 million

#### For our employees



- 809 employees
- 44% women (44% in 2020-2021)
- €60 million of value shared with our employees (payroll)

#### For our customers



- Nearly 3.5 billion photos printed
- Tens of millions of users of our software
- Thousands of sites equipped with our IoT solutions around the world

## 8 Report of the independent third-party on the consolidated non-financial performance statement

### Fiscal year ended June 30, 2022

*This is a free English translation of the Independent third party's report issued of the original report issued in the French language and it is provided solely for the convenience of English speaking users. This report should be read in conjunction with, and construed in accordance with, French law and professional standards applicable in France.*

To the General Meeting,

In our capacity as an independent third party, accredited by the COFRAC under number No. 3-1681 (scope of accreditation available on the website [www.cofrac.fr](http://www.cofrac.fr)), and as a member of the network of one of the statutory auditors of your company (hereinafter "entity"), we conducted our work aiming at providing a conclusion expressing a limited level of assurance on the compliance of the consolidated non-financial statement for the year ended June 30, 2022 (hereinafter the "Statement") with the provisions of Article R. 225-105 of the French Commercial Code (Code de Commerce) and on the fairness of the historical information (whether observed or extrapolated) provided pursuant to 3° of I and II of Article R. 225-105 of the French Commercial Code (hereinafter the "Information") prepared in accordance with the entity's procedures (hereinafter the "Guidelines"), included in the management report pursuant to the requirements of Articles L. 225-102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code (Code de Commerce).

### Conclusion

Based on our procedures as described in the section "Nature and scope of the procedures" and the evidence we have obtained, no material misstatements have come to our attention that cause us to believe that the non-financial statement does not comply with the applicable regulatory provisions and that the Information, taken as a whole, is not fairly presented in accordance with the Guidelines.

### Comments

Without modifying the above conclusion and in accordance with the requirements of Article A. 225-3 of the French Commercial Code, we have the following comments:

The policies and action plans relating to most of the risks identified as main risks have yet to be deployed in all the Group's entities, particularly in the United States and China, which account for 74% of the workforce.

### Preparation of the non-financial statement

The absence of a generally accepted and commonly used reference framework or established practices on which to base the assessment and measurement of the Information enables the use of different but acceptable measurement techniques that may impact comparability between entities and over time.

In consequence, the Information should be read and understood with reference to the Guidelines, the material elements of which are set out in the Statement and are available on request from the Company's head office.

### Limitations inherent in the preparation of information

The Information may be subject to uncertainty inherent in the state of scientific or economic knowledge and in the quality of the external data used. Certain information is sensitive to the methodological choices, assumptions and/or estimates made in preparing it and presented in the Statement.

### The entity's responsibility

The Board of Directors is responsible for:

- selecting or determining the appropriate criteria for the preparation of the Information;
- preparing a Statement in accordance with legal and regulatory requirements, including a presentation of the business model, a description of the main non-financial risks, a presentation of the policies applied with regard to these risks as well as the results of these policies, including key performance indicators and, in addition, the information required by Article 8 of Regulation (EU) 2020/852 (green taxonomy);
- and implementing the internal control procedures it deems necessary to ensure that the Information is free from material misstatement, whether due to fraud or error.

The Statement has been prepared by applying the Company's Guidelines as referred to above.

## Responsibility of the independent third party

Based on our work, our role is to formulate a reasoned opinion expressing moderate assurance as to:

- the Statement's compliance with the provisions of Article R. 225-105 of the French Commercial Code;
- the accuracy of the historical information (observed or extrapolated) provided in accordance with Article R. 225-105 I, 3° and II of the French Commercial Code, i.e. the outcomes, including key performance indicators, and the measures implemented considering the principal risks (hereinafter the "Information").

As it is our responsibility to issue an independent conclusion on the Information prepared by management, we are not authorized to participate in the preparation of the Information, as this could compromise our independence. It is not our responsibility to provide a conclusion on:

It is not our responsibility to provide a conclusion on:

- the Company's compliance with other applicable legal and regulatory provisions (particularly with regard to the information set out in Article 8 of Regulation (EU) 2020/852 (green taxonomy), the duty of vigilance and the fight against corruption and tax evasion);
- the fairness of information set-out in Article 8 of Regulation (EU) 2020/852 (green taxonomy); and tax evasion;
- compliance of products and services with applicable regulations.

## Applicable regulatory provisions and professional guidance

We performed the work described below in accordance with Articles A. 225-1 et seq. of the French Commercial Code, the professional guidance issued by the French Institute of Statutory Auditors (Compagnie Nationale des Commissaires aux Comptes) relating to this engagement and acting as the verification program and with the international standard ISAE 3000 (revised)<sup>(1)</sup>.

## Independence and quality control

Our independence is defined in the provisions of L. 822-11 of the French Code of Commerce and the profession's Code of Conduct. We have also implemented a quality control system comprising documented policies and procedures for ensuring compliance with the codes of ethics, professional doctrine and applicable legal and regulatory texts.

## Means and resources

Our work was carried out by a team of three people between September and October 2022 and took a total of three weeks.

In the performance of this engagement, we obtained assistance from our specialists in the fields of sustainable development and social responsibility. We met with the individuals responsible for preparing the Statement representing in particular the human resources, health and safety departments.

## Nature and scope of our work

We planned and performed our work taking account of the risk of material misstatement of the Information.

In our opinion, the procedures we have performed in the exercise of our professional judgment enable us to provide a limited level of assurance conclusion:

- we obtained an understanding of all the consolidated entities' activities, and the description of the principal risks associated;
- we assessed the appropriateness of the Guidelines regarding their relevance, exhaustiveness, reliability, neutrality and comprehensibility, taking into account, where applicable, best practices in the sector;
- we verified that the Statement includes each category of social and environmental information set out in Article L. 225-102-1-III;
- we verified that the Statement provides the information required under Article R. 225-105-II of the French Commercial Code, where relevant with respect to the principal risks, and includes, where applicable, an explanation for the absence of the information required under Article L. 225-102-1-III, paragraph 2 of the French Commercial Code;
- we verified that the Statement presents the business model and a description of principal risks associated with all the consolidated entities' activities, including where relevant and proportionate, the risks associated with their business relationships, their products or services, as well as their policies, measures and the outcomes thereof, including key performance indicators associated to the principal risks

(1) ISAE 3000 (revised) - ISAE 3000 - Assurance engagements other than audits or reviews of historical financial information

- we referred to documentary sources and conducted interviews to:
  - assess the process used to identify and confirm the principal risks as well as the consistency of the outcomes, including the key performance indicators used, with respect to the principal risks and the policies presented,
  - corroborate the qualitative information (measures and outcomes) that we considered to be the most important presented in Appendix 1. For certain risks (lack of adequate human resources, poor integration of new employees or inadequate training of employees and inadequate health and safety measures in the workplace), our work was carried out on the consolidating entity. For the other risks, our work was carried out on the consolidating entity and on a selection of entities listed hereafter: PlanetArt United States ;
- we verified that the Statement covers the scope of consolidation, i.e. all the consolidated entities in accordance with Article L. 233-16 of the French Commercial Code within the limitations set out in the Statement;
- we obtained an understanding of internal control and risk management procedures the entity has put in place and assessed the data collection process to ensure the completeness and fairness of the Information;
- for the key performance indicators and other quantitative outcomes that we considered to be the most important presented in Appendix 1, we implemented:
  - analytical procedures consisting in verifying the correct consolidation of collected data as well as the consistency of changes in them,
  - substantive tests, based on sampling or another means of selection, that consisted in verifying the proper application of definitions and procedures and reconciling data with supporting documents. This work was carried out on a selection of contributing entities listed above and covers 60% of the consolidated data selected for these tests (60% of the workforce);
- we assessed the overall consistency of the Statement based on our knowledge of all the consolidated entities.

The procedures performed for a limited assurance engagement are less extensive than those required for a reasonable assurance engagement performed in accordance with the professional doctrine whereas a higher level of assurance would have required more extensive audit work.

Paris-La Défense, October 28, 2022

Independent third party  
Ernst & Young et Associés

Christophe Schmeitzky  
Partner, Sustainable Development

## Appendix 1: Most important Non-Financial information

### Employee information

Quantitative information (including key performance indicators)	Qualitative information (measures and outcomes)
Number of employees <ul style="list-style-type: none"> <li>● Breakdown by gender</li> <li>● Breakdown by age</li> <li>● Employees working from home (partial and total)</li> <li>● Number of training hours</li> <li>● Hours worked</li> <li>● Number of lost-time accidents</li> <li>● Number of occupational diseases</li> <li>● Number of lost days due to workplace accidents</li> </ul>	Measures implemented for the employment and recruitment of employees <ul style="list-style-type: none"> <li>- Training program for Canadian employees</li> <li>- Measures relating to health and safety at work</li> </ul>

### Social information

Quantitative information (including key performance indicators)	Qualitative information (measures and outcomes)
<ul style="list-style-type: none"> <li>● Percentage of subsidiaries with a Data Processing Coordinator (DPC)</li> <li>● Percentage of subsidiaries covered by the GDPR risk mapping</li> <li>● Percentage of customer inquiries concerning personal data</li> </ul>	Personal data protection roadmap and measures implemented

## 9 Glossary

### AMF:

The French Securities Regulator (AMF–*Autorité des marchés financiers*) is an independent public authority which has the status of a financially independent legal entity, tasked with protecting savings invested in financial instruments, informing investors and ensuring the proper functioning of the financial instruments markets in France.

### Artificial Intelligence:

Artificial Intelligence (AI) refers to techniques designed to enable machines to imitate human cognitive processes (reasoning, learning, etc.) through the development of complex computer programs used for various applications (medical diagnostics, personal assistants, autonomous cars, etc.).

### B2B (BtoB):

Business-to-Business qualifies a commercial activity between two companies.

### B2C (BtoC):

Business-to-Consumer qualifies a commercial activity between a company and a consumer who is the end-users of its products or services.

### Black Friday:

Name given in the United States on the Friday following the celebration of Thanksgiving at the approach of Christmas and which historically represents the day of the year when the commercial activity is the most important. A large part of merchants benefit of this moment to offer significant sales.

### CCPA (California Consumer Privacy Act):

Data Privacy Act that regulates how companies handle the personal information of California residents.

### Cloud:

(or cloud computing) is an IT infrastructure in which computing power and storage are managed by remote servers to which users connect via a secure Internet link and a physical access point (desktop, smartphone, tablet, connected object).

### CSR:

Corporate Social Responsibility, refers to taking into account by companies social and ethical issues in their activities.

### Data Protection Officer (DPO):

Person in charge of personal data protection within an organization.

### E-commerce:

Electronic commerce or internet commerce, refers to the buying and selling of goods or services using the internet.

### FSC®:

Forest Stewardship Council. International organization promoting responsible forest management.

### GDPR:

Data Protection Regulation, a European regulatory framework for data processing.

### IoT:

Internet of Things, global infrastructure for the Information Society, which provides advanced services by interconnecting objects (physical or virtual) through existing or evolving interoperable information and communication technologies (definition of the International Telecommunication Union).

### LoRa™:

Wireless long-distance telecommunication technology deployed via a Low-Power Wide-Area Network (LoRaWAN) as part of the Internet of Things.

### LTE-M (Long-Term Evolution for Machines):

A low power and long-range communication standard dedicated to the Internet of Things.

### NB-IoT (Narrowband IoT):

A low-power and long-range communication standard dedicated to the Internet of Things.

### NFS:

Non-Financial Statement reporting.

### PaaS:

Platform as a Service is a cloud computing model aimed primarily at professionals and especially developers. This cloud computing model integrates the hardware infrastructure and software tools to design, test and deploy online applications and services from the cloud.

### Panic button Push & Protect:

Multi-network technology - emergency communication solution.

### Paycheck Protection Program (PPP):

Business loan program established by the 2020 US Federal government in response to the COVID-19 pandemic.

### Personalized e-commerce:

All digital printing, photo and personalized gifts.

### Right to disconnect:

The employee's right to disconnect from professional digital tool (smartphone, computer, tablet, email, software etc.) during non-work hours.

**Royalties:**

Payments that repeatedly occur in exchange of operating rights (licenses, copyrights, trademarks) or the rights to use a service.

**SaaS:**

Software as a Service. Method of software delivery and licensing in which software is accessed online via a subscription.

**Sapin II:**

Law on transparency, anti-corruption and economic modernization. Applies to French companies with more than 500 employees and revenues of more than 100 million euros.

**Sigfox:**

Low power wide-reaching signal telecommunications network used to send small amounts of data between objects without a cell phone.

**Smartphone:**

Mobile phone with advanced features similar to those of a computer (internet browsing, video playback, office tools, etc.).

**Software:**

All programs, processes and instructions for computer hardware to execute.

**VPN (Virtual Private Network):**

Service allowing to navigate on the web in a confidential and secure way by passing the internet connection through a server.



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