

Capefront CSR Policy

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CAPEFRONT FULLY COMMITTED TO A CSR APPROACH

As part of its Corporate Social Responsibility (CSR) Policy, a reference document defining the objectives, principles, and roles of each party, **Capefront** is particularly **committed to** integrating social, societal, and environmental concerns into its corporate strategy, its relations with its partners, customers and suppliers, and its operational activities. As a partner to businesses and the self-employed, we are a key player in the development of relations between customers and suppliers, with the aim of building a sustainable and balanced relationship within a framework of mutual trust.

More specifically, Capefront undertakes to:

- Protecting the environment, helping to preserve natural resources and biodiversity, combating **climate change** by substantially reducing our CO2 emissions, reducing paper printing, adapting our premises to clean, non-polluting energy sources and choosing our suppliers and subcontractors according to **CSR criteria**.
- Choose partners with the ability to **promote**, through innovation and Research and Development, environmental, economic and social solutions that meet the needs of future generations.
- Raising our employees' awareness of **environmental issues** and the need to adapt their behaviour accordingly.
- Promoting diversity **and combating discrimination** to ensure equal opportunities.
- Encourage the **development of skills** and the social advancement of our employees throughout their working lives, through **ongoing training**.
- Ensuring a stimulating working environment that is open to dialogue and **complies with work rules and standards**.

To give full meaning to our CSR policy, the Capefront Group has embarked on an **Ecovadis** assessment process, with the first assessment due in June 2023.

Capefront intends to demonstrate its commitment to an exemplary CSR policy and to continuous progress on the key issues raised by Corporate Social Responsibility.

1 Capefront CSR strategy

Capefront is responding to the challenges of the energy transition by diversifying its business activities:

- The energy sector, favouring low-carbon energies:
 - Offshore wind turbine;
 - Gas, including LNG, hydrogen, and biogas;
 - The thermal industry, including waste recovery industry;
 - The electric mobility industry;
 - Nuclear energy.
- Projects that contribute to energy independence and performance.

Capefront is committed to increasing its customer portfolio activities to 40% of turnover in low-carbon energies by 2025.

Capefront has embarked on a policy that incorporates the need to **become a genuine partner for committed customers**. The Group wishes to contribute its services and expertise:

- New energy transition programmes;
- Securing and developing low-carbon energy production capacity;
- Marine and port development projects;
- New infrastructures, including those linked to electric mobility;
- Defence projects and overcoming energy dependency.

2 Our environmental initiatives

Capefront is committed to improving its practices in order to limit its impact and move towards a fairer and more sustainable environmental policy.

We have made a number of commitments:

2.1 Implementing a responsible energy management

The fight against global warming and the energy transition represent a major challenge that Capefront has fully grasped, and as such is one of the major objectives of our environmental policy.

In order to improve our energy performance, a drastic CO2 reduction plan has been put in place, with the aim of reducing our CO2 footprint by 25% by 2025.

To achieve this objective, a number of provisions have been introduced, including:

- **Strict compliance with energy laws and regulations,**
- **Launch of a process to assess our environmental impact, with an initial assessment based on Ecovadis standards in June 2023,**
- **Optimising the consumption of our energy-intensive facilities**
 - Server virtualisation, which enables several servers (from 2 to 20) to be housed on a single physical machine, significantly reducing energy consumption,
 - More than 80% of our IT equipment is made up of laptops, which consume less energy than desktop PCs,
 - All the screens used at the workstations are LED screens,
 - Premises heated and cooled by reversible air conditioning (thermostat) do not allow windows to be opened,
 - The premises are thermally insulated and have double-glazed windows.
- **Applying best practice in energy savings**
 - Raising employee awareness of best practice in reducing energy consumption through our CSR managers,
 - Setting "sleep" modes on all workstations and IT equipment,
 - Systematically switching off PCs and screens in the evening,
 - Automatic light switch-off.
- **Purchase of energy-efficient technological facilities**
 - Purchase of "EPEAT Gold" and "Energy Star" labelled IT equipment,
 - Purchase of low-energy lighting (LED screens, etc.).

2.2 Going paperless - Dematerialisation

Capefront has set itself a "paperless target" as one of the priorities of its CSR strategy.

Its implementation has enabled us to reduce our paper consumption by more than 40% in 5 years, and we are continuing our efforts to reach the target.

To achieve this, Capefront takes action on a daily basis to rationalise printing among its employees and communicates these best practices to its network partners and subcontractors (SMEs, VSEs, freelancers, etc.):

- Reducing the volume of printing (black and white, double-sided, systematic use of print previews, use of recycled paper, etc.),
- Collection and recycling of consumables (paper, toners, cartridges),
- Reduced consumption of envelopes and mailings, which in turn reduced our consumption of franking ink,
- Reuse of unused printed paper as scrap paper or notepads.

Capefront is also adopting paperless solutions for contractual exchanges and document deliverables with its employees, partners and customers in order to reduce the use of paper:

- Collaborative workspaces under Sharepoint and Teams;
- Use of platforms for exchanging information on contractual, administrative and operational aspects with network partners and customers: Provigis platform for regulatory compliance, "Flow" platform for monitoring and invoicing services;
- Introduction of electronic signatures to authenticate the integrity of documents in electronic format.

2.3 Responsible travel policy

Capefront is committed to limiting and/or reducing its greenhouse gas emissions through long-term initiatives with its employees, which have already paid off:

- When travelling outside Paris, we give priority to train travel rather than air travel,
- All employees have PCs enabling them to take part in videoconferences to limit travel,
- A teleworking charter has been in place since 2021, enabling employees to work from home 2 or 3 days a week.

Capefront undertakes to implement the following measures in connection with its contracts:

- Use of soft modes of transport to get to customer sites (train, bus, metro or hybrid or electric vehicles),
- **Offering local skills to reduce travel time. This is a real differentiating factor that Capefront is able to guarantee through the geographical coverage of its network of partners,**
- Limiting travel for services, giving preference to audio or video-conferencing for discussions and meetings wherever possible,
- Remote training for stakeholders (e-learning).

2.4 Implementing a policy of 'empowerment' in the use of digital technology

Capefront fully subscribes to the concept of digital sobriety, which implies a radical change in the way we use digital technology globally, as over-consumption has become a worrying source of pollution. This means regularly raising our employees' awareness of the best practices to adopt:

- Regular sorting of mailboxes,
- Limiting the use of email in favour of the Teams communication application,
- Limitation of attachment transfers and number of recipients,
- Identification of the most carbon-intensive digital workstations,
- Purchasing eco-designed and sustainable equipment and applications,
- Extending the lifespan of employees' IT equipment,
- Switching from physical servers to a single Cloud for all teams, thereby reducing document redundancy. Eliminating physical servers will reduce our energy and disk space consumption.

2.5 Waste management

- **Reuse policy for our electronic waste**
 - Reconditioning of all computer equipment still in working order,
 - Systematic recycling of all our WEEE (toner cartridges, computer or telephone batteries, light bulbs, USB sticks, PCs, etc.), for re-use or recovery,
 - Take used batteries to collection points near our premises,
 - Rigorous monitoring of the lifecycle of our equipment: a computer that is out of warranty or has broken down is automatically recycled and removed from the computer pool if it is no longer in use. If it is still functional, it is reconditioned for re-use.

- **Reducing the volume of solid waste**
 - Installation of network water fountains to encourage employees to reduce their consumption of plastic bottles.

- **Encouraging sorting**
 - Where possible, dedicated sorting bins for paper/plastic and other recycled waste,
 - A policy of making our employees aware of the importance of sorting for recycling and storing non-recyclable materials.

2.6 Global eco-responsible management on a daily basis

- Reduced consumption of plastic cups,
- Recycling coffee pods,
- Use of biodegradable cleaning products,
- ...

3 Social and community policy

Capefront recruits its employees from a **wide range of backgrounds**. In addition, the Group is committed to offering both new recruits and existing employees **varied career paths** that meet their expectations.

This proactive policy has led the Group to launch progress initiatives in areas such as diversity, **equal opportunities** and **the continuous improvement of working conditions**.

3.1 Quality of life at work

Capefront is particularly committed to the well-being of its employees and has put in place a number of measures relating to quality of life at work and the balance of its employees' lives in order to provide an optimal working environment.

Ultra-mobility, teleworking and the installation of video-conferencing systems are just some of the tools available to our teams to improve their working conditions.

The introduction of teleworking in 2021 has made a significant contribution to the well-being of our employees.

We have also introduced the flex office. Employees no longer have dedicated workspaces but self-service workstations in shared, flexible and connected office spaces. This optimises space but also encourages dynamism and co-construction between teams.

Capefront wants to create a community of ambassador consultants who will benefit from meetings and take part in events organised by the Group. The aim is to promote well-being at work among these consultants, who are not strictly speaking part of the Group's internal workforce.

It is also planned that in-house employees will travel less, but in a more qualitative way, around physical work sessions based on collective intelligence, while encouraging team building and exchanges between employees.

3.2 Diversity and equal opportunities

Capefront actively seeks to ensure that its workforce reflects the full diversity of its working environment. Its human rights policy clearly sets out its responsibility: to guarantee **equal opportunities for employees** and to ensure that the diversity of individuals and opinions is recognised and respected. Its commitment to equality and its policy of non-discrimination are also reflected in specific initiatives against **harassment and discrimination**.

This commitment applies to **all stages of human resources management**, including recruitment, training, promotion and career advancement.

Capefront also undertakes to give priority to:

- Local recruitment to promote regional development in terms of employment,
- Valuation of training hours completed under work-study contracts (apprenticeship or professionalisation),
- The objective of gender parity in the sourcing and recruitment phases,
- Integration of seniors,
- Integration of people with disabilities.

Capefront is also committed to **young people under the age of 26**. We recruit work-study students and apprentices whom we support throughout their career, thanks to the commitment of the company's tutors. At the end of their contracts, we can recruit them on permanent contracts when the business permits.

3.3 Health and safety

Personal **health** and **safety** are **fundamental values** at Capefront. The Group believes that it has a responsibility to provide **greater protection for** all its employees against occupational hazards and to enhance their **safety**.

This involves :

- Compliance with rules and standards,
- The working environment: temperature of the premises, ventilation, lighting, exposure to noise, work patterns and working hours, etc,
- Long-term prevention of musculoskeletal disorders (MSDs),
- Avoid psychosocial risks: stress, physical or verbal aggression, etc,
- Reducing hazardous situations: periodic checks on electrical installations, limiting exposure to or replacing hazardous products, etc,
- Signs in corridors, fire extinguishers, plans and safety instructions in case of evacuation.

4 Ethics and suppliers

4.1 Responsible Purchasing

As an intermediary between customers and suppliers, Capefront group is obliged to adopt a responsible and exemplary purchasing policy.

The actions we have already taken and our objectives include **a commitment to fair and sustainable relations with our suppliers**, encouraging listening, communication, mediation and respect. A sustainable relationship also requires **financial fairness** between the parties and equal treatment for each supplier. Finally, we do our best to ensure that social responsibility is integrated, with actions in favour of the environment and ethics.

4.1.1 Listening to suppliers

Capefront advocates listening carefully to all its partners and is committed to taking every possible action to improve its service. The success of the model also depends on knowing and listening to its suppliers, who are the guarantors of a stable and fair relationship. Capefront intends to put in place the strategies needed to ensure the continuity of its relationships with its suppliers, which means taking into account and listening to each and every one of them.

4.1.2 Equal treatment

Capefront promotes total equality in the choice and treatment of its suppliers throughout the tendering, selection and contract negotiation processes. The Group intends to be completely neutral in its choice of suppliers, in order to eliminate any form of unequal treatment. We are keen to ensure that this fairness is respected among all our suppliers in order to support stable, fair and lasting relationships for both parties.

4.1.3 Supplier relations and encouraging mediation

The quality of Capefront relations with its partners and suppliers is essential to the company's development. The Group is keen to maintain a lasting relationship with its partners by encouraging mediation. Our approach is one of negotiation, not obligation. Capefront prefers mediation to any other treatment when it comes to resolving disputes.

4.2 Code of ethics

Capefront is implementing several policies to strengthen its governance framework.

Capefront employees receive the Code of Ethics and the Group's various policies as soon as they join the Group.

Our anti-corruption policy sets out the following guiding principles:

- Capefront prohibits all forms of corruption in the public and private sectors;
- Capefront prohibits the use of funds or other assets for illegal or reprehensible purposes;
- Capefront requires its staff to comply with all applicable anti-corruption laws.
-

Capefront's anti-corruption policy focuses on:

Report

Members of the Capefront Group have a duty to report any known or suspected past, present or potential breaches of policies and procedures, applicable anti-corruption laws and regulations, as well as any attempt to compromise Capefront's integrity and ethical standards.

The Group's Management is available to Capefront employees to handle any report, guaranteeing anonymity except in the case of local regulations and access to personal data. Capefront will not tolerate any form of retaliation against a person who makes a report in good faith or who mentions a concern in the interest of Capefront.

Gifts & invitations

This policy defines the rules to be followed by Capefront members regarding gifts and invitations, whether received or offered.

Political contributions

The use of Capefront funds, its properties and its various services or resources to contribute to a political party or to support a candidate for a government or public office is prohibited.

Facilitation payments

Capefront prohibits all its members:

- To make facilitation payments,
- To authorise them,
- To offer them directly or indirectly,
- Or promise to.

In cases where a Capefront member has no choice but to pay a sum of money in order to protect themselves from an imminent and serious threat to their health or safety, this sum of money will be considered as extortion and will be tolerated subject to reporting to the CSR managers.

Civil servant

Capefront prohibits the hiring of any public employee or family member with whom Capefront has been dealing. Should such a case arise, the Human Resources Department must be consulted.

Business partner

Capefront expects all third parties with whom it does business to respect our principles, culture and values and to comply with all applicable legislation and regulations.

Antitrust & trade

The purpose of this policy is to promote and ensure compliance with antitrust and competition laws and regulations while maintaining ethical behaviour that ensures fair competition. As it is impossible to cover all levels of requirements under applicable antitrust laws and regulations, the Policy is intended to promote compliance with legal and ethical antitrust requirements, as well as to assist Capefront personnel in understanding the types of conduct covered by antitrust and competition law.

Accounting practices

The accuracy, completeness and reliability of records are critical to Capefront as they form the basis for decision making and strategic planning. Accordingly, all our records are maintained in accordance with applicable laws and regulations, and Capefront standard accounting and reporting processes and operating procedures.

4.3 Training and communication

Capefront provides its employees with a code of ethics. All employees must read the latest version.

In 2023, all Capefront employees will attend an awareness-raising session on the prevention of corruption in accordance with the SAPIN 2 law (as part of the training of CSR referents and CSR awareness-raising) to better identify situations of conflict of interest and be able to react appropriately in such situations.

The Code of Ethics covers all our values, policies and anti-corruption principles in force within the Group. It is regularly updated and establishes a framework to guide our decisions in situations where it is sometimes difficult to choose the right course of action.

It is designed to help us make the right decisions in a variety of situations.

4.4 Compliance of our partners

Capefront is committed to transparency and accuracy in its daily dealings with its partners. We only work with third parties who share our values and our culture of integrity.

Therefore, before entering into an agreement with a partner, we take certain steps to properly assess the business relationship and mitigate the risks it presents.

Capefront may terminate a business relationship with a third party who behaves in a manner contrary to its values and practices.

Capefront and its suppliers are bound by the **Supplier Quality Insurance Charter**, which aims at formalising the specific rules applicable to service providers to whom Capefront has entrusted the provision of services.

By applying the principles of this charter, service providers ensure that Capefront receives services that meet its expectations and that the risks associated with the specified quality of these services are controlled.

This charter is therefore one of the foundations for the development of a relationship of trust and partnership between Capefront and its service providers.

Capefront's service providers must comply with these rules.

The main commitments for service providers are as follows:

- Providing Capefront with transparent information and honouring contractual commitments
- Guaranteeing quality services and a continuous improvement approach
- Assigning qualified staff to carry out services
- Maintaining a good commercial relationship with Capefront
- Respecting the principle of loyalty
- Respecting the principle of confidentiality and professional secret
- Respect Capefront purchasing processes
- Comply with employment legislation and social commitments
- Developing an environmental management system

4.5 Duty to report

Capefront personnel must be vigilant in identifying situations where behaviour may be illegal or unethical, and must act promptly and appropriately to prevent or detect improper conduct.

4.6 Consequences of misconduct & disciplinary system

Capefront applies consistent and meaningful disciplinary measures when unethical behaviour is discovered. Sanctions are swift and fair, and consequences are objective, regardless of the individual's position within the company or performance.

4.7 Process improvement

After examining the root causes of breaches, we take the necessary steps to improve our processes and prevent such situations from recurring. In this way, we ensure that risks are mitigated and controls tightened.