

SUSTAINABILITY REPORT



At Clayens, we attach great importance to the challenges of Corporate Social Responsibility. With the mission of contributing to a better and more harmonious world, we are committed to continually improving our practices.

Our proactive approach is based on simple, concrete, and fundamental principles, adapted to the specific challenges of the plastics industry. From our raw materials to our finished products, including our industrial tools, we are active drivers of the transformation and evolution of our businesses.

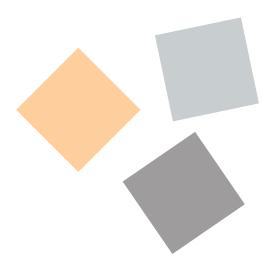
Together, we are building a future where we produce responsibly, respect our planet, and value every individual involved in our value chain. We are proud of this mission and continue to work resolutely to make our commitments a tangible reality.

Eric Pisani CEO Clayens Group

EDITED

SUMMARY

The Clayens company		4
CSR approach		15
Governance		30
CSR issues		37
Social	37	
Environment	59	
Value chain and products	96	
Business ethics	110	
Annexes		118
Methodological note	118	
Glossary	121	



THE CLAYENS COMPANY

OUR COMPANY

Clayens is a world leader in engineering and industrial subcontracting, with specific expertise in the implementation of polymers, composites and precision metals.

For nearly 100 years, Clayens has been supplying industry leaders.

Clayens is one of the world leaders in engineering and industrial subcontracting, with specific expertise in the implementation of polymers, composites and precision metals.

For nearly 100 years, Clayens has been supplying industry leaders in various sectors: Aerospace, Automotive, Electric & Infrastructure, Healthcare, and Industry & Equipment.

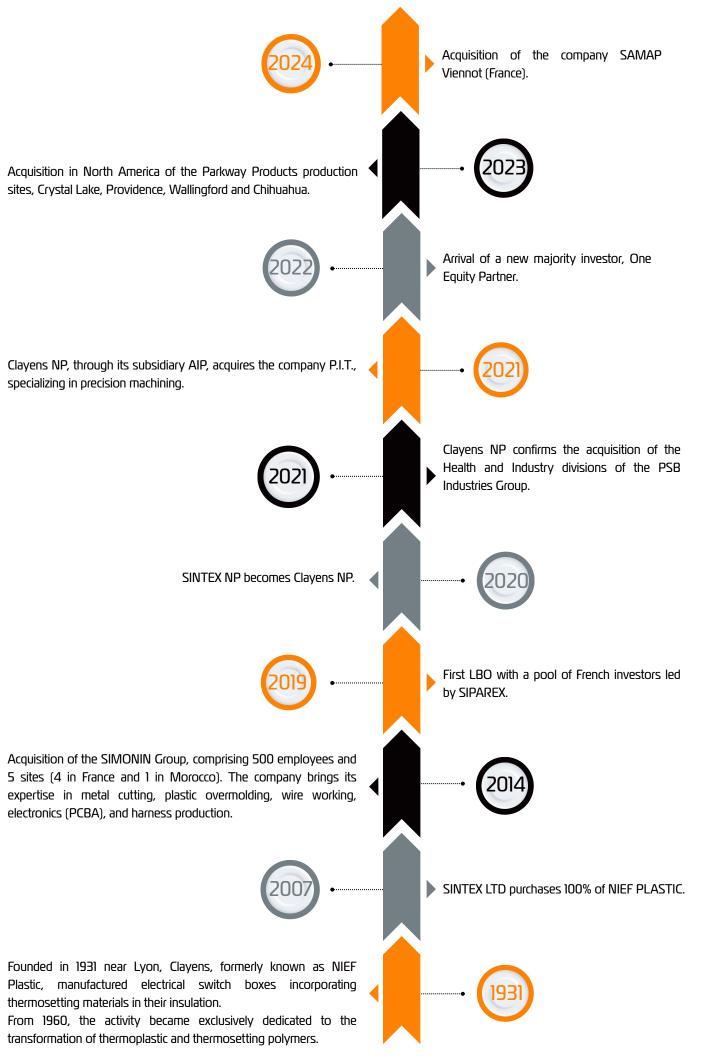
Based in France, the company has grown to over 30 factories across nine countries in Europe, Africa (EMEA) and North America (NAM).

Clayens designs, and manufactures products and technical solutions for its customers, using thermoplastics, thermosets (compression and injection), high-performance polymers, thixomolding and metalloplastics.

Drawing on leading R&D and engineering teams, Clayens deploys innovative technologies to deliver cutting-edge applications, from design to production, including packaging and logistics.

With a presence on 3 continents and 5 engineering centers with robust quality systems and optimized manufacturing solutions, Clayens has the capacity to support its customers for high-volume customized manufacturing, while being flexible enough to meet the rapidly evolving needs of the markets they serve. At Clayens, we see "A world of opportunity" to seize together.

Equality and diversity are not just values, but real drivers of performance and innovation within Clayens.



OUR DEPLOYMENT



For more information, please refer to our website.



OUR STRATEGIC MARKETS



AEROSPACE & DEFENSE

10%



AUTOMOTIVE

20%



INDUSTRIAL & EQUIPMENT

25%



ELECTRIC & INFRASTRUCTURE

30%



HEALTHCARE

15%

X

AEROSPACE & DEFENSE

8 sites dedicated to the aerospace sector in Europe, USA, Mexico

We leverage our expertise in materials processing to design and manufacture custom aerospace parts, ensuring innovation, performance, and reliability of structural and individual aerospace components.



AUTOMOTIVE

Manufacturing of safety-critical parts using automated production processes.

Expertise in camera inspection and traceability via QR codes and RFID tags if necessary.

We are a leading player in the manufacturing of automotive components, offering tailored solutions to meet strict safety and environmental standards, while supporting you in the transition to electric vehicles.



ELECTRIC & INFRASTRUCTURE

Delivering innovative design, advanced manufacturing and comprehensive support Ensuring high safety standards and cutting-edge technology

We are a leading supplier of high-performance electrical parts, from household switches to high-voltage insulators, and have been serving major players in the electrical industry for over 70 years.



HEALTHCARE

11 sites dedicated to health 8 clean rooms: 5 in France (ISO7), 2 in the USA (ISO8), 1 in Mexico (ISO7)

We collaborate with leading healthcare innovators, providing precise plastic injection and machining solutions for medical devices and pharmaceutical packaging, fully compliant with global regulatory standards.



INDUSTRIAL & EQUIPMENT

Tailor-made solutions: from single units to large-scale production

We provide cutting-edge solutions in the design and production of precision parts for various industrial applications, combining extensive materials expertise with cutting-edge technology to bring your most ambitious projects to life.

OUR STRATEGY

Clayens's business model is based on two key elements: geographic proximity to its customers and diversification of the Group's target markets. This approach aims to reduce dependence on a single sector of activity, thereby increasing resilience.

Clayens' strategy is based on three pillars:



A clean and unique model

A brand, Clayens, shared by all units of the Group.

A standardized operational model deployed across all Group sites Cross-functional CSR projects that will be deployed across the entire Group to support a responsible and sustainable corporate culture.

A commitment to social and environmental responsibility is central to our mission, aiming to promote ethical practices and minimize our environmental footprint.

By encouraging innovation and continuous improvement, we seek to integrate these values into every aspect of our business. This includes implementing more efficient processes, and adopting green technologies. Together, these efforts contribute to building a more sustainable future for all.



Performance and competence

Strengthening our operational performance.

Adapting our constantly evolving industrial model to optimize customer support and optimize our costs Always offering a wide range of technologies and innovations to meet the diverse needs of our customers, while maintaining a high level of quality and responsiveness.

Our teams are dedicated to operational excellence, constantly seeking to improve our processes and adopt industry best practices.

We ensure that our employees are well equipped to meet future challenges. This approach allows us to remain competitive while supporting our core values of sustainability and innovation.



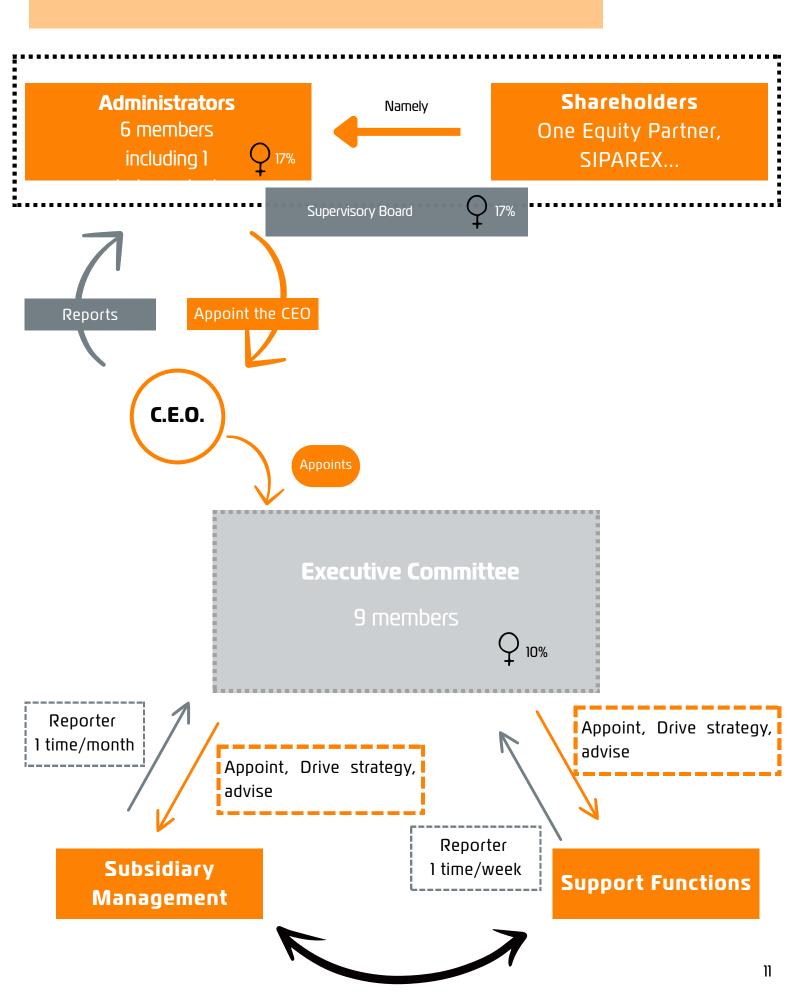
Growth

The objective is to expand the strategic segmentation (market/geography matrix) by developing, or by mainly targeting, markets with high growth potential.

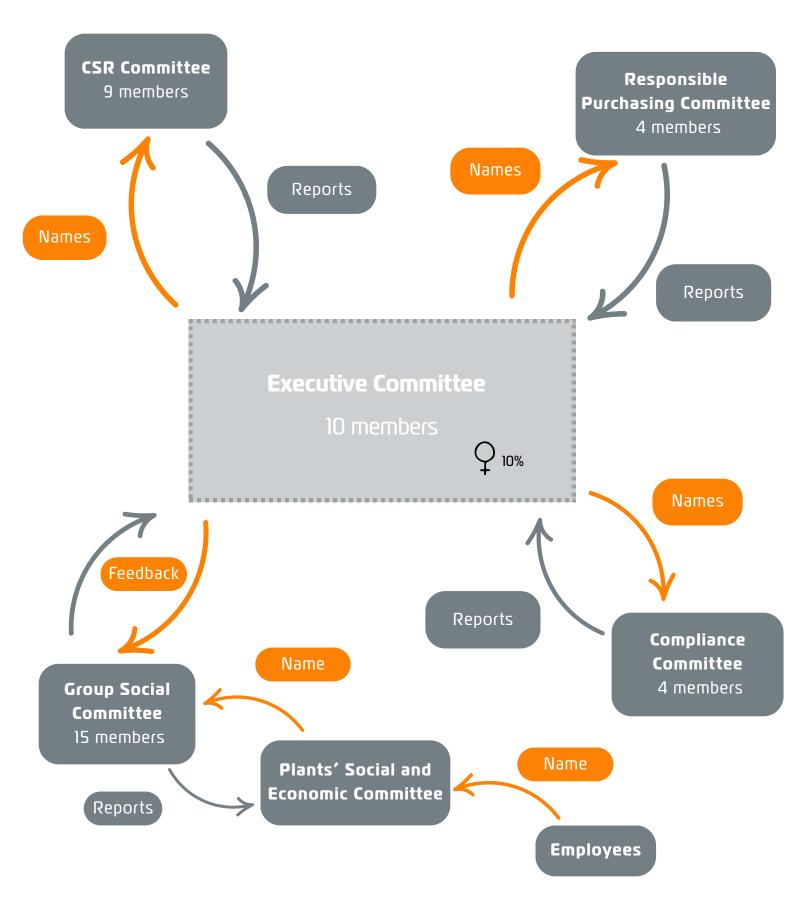
By investing in high-value sectors, we aim to strengthen our position in the global market while remaining agile in the face of economic change.

Furthermore, geographic expansion will allow us to get closer to our clients, facilitating closer collaboration and a better understanding of their specific needs. We are also focused on developing strategic partnerships that can enrich our expertise and open up new opportunities for innovation. By combining these elements, we are committed to creating sustainable growth that benefits all stakeholders in our ecosystem.

GLOBAL GOVERNANCE



GLOBAL GOVERNANCE



GLOBAL GOVERNANCE



Eric Pisani CEO



David BerthillerSenior Executive Vice President
Finance, HR & IT



Brice Collet-BeillonSenior Executive Vice President
EMEA



Douglas ConstableSenior Executive Vice President
NAM



Pascal WolffExecutive Vice President
Engineering



Eric Manessier Executive Vice President Industry, Quality, EHS



Brian FlynnExecutive Vice President
Business Development



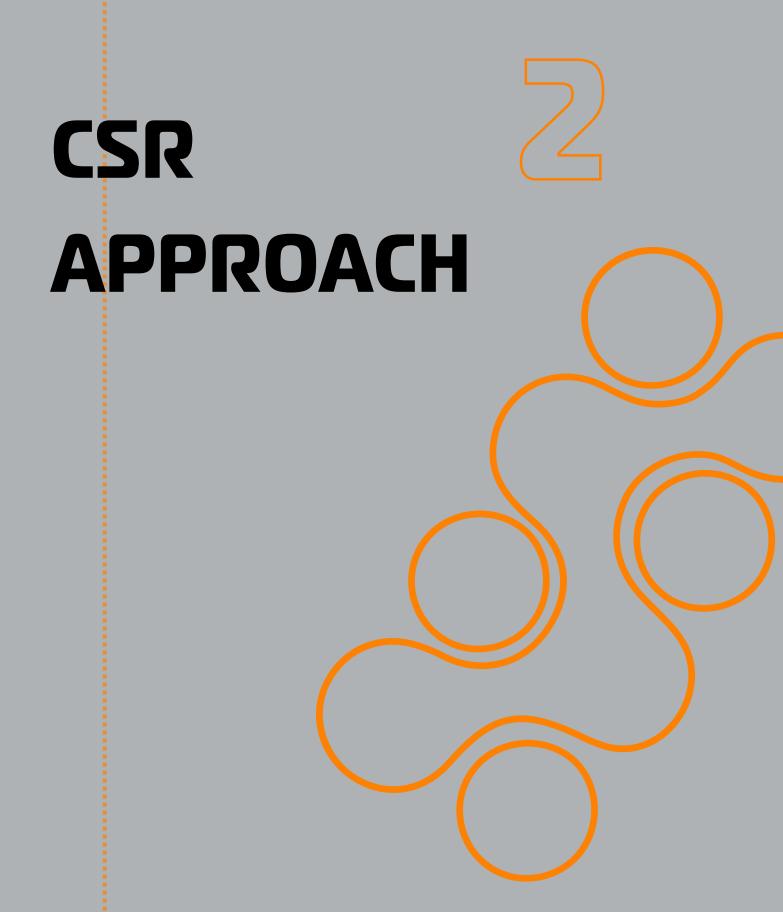
Alexandra Teleki Executive Vice President Procurement



Jeremy Guivarc'h Executive Vice President R&D

OUR VALUE CHAIN





OUR VISION





Unite all employees around innovative and committed projects.



Improve business practices by questioning at all levels the impact of our activities and our decisions on society and the environment.



Enrich the dialogue with our stakeholders and raise their awareness of CSR issues.

OUR VALUES

Our diverse expertise allows us to respond to the challenges of various sectors, and to offer our clients comprehensive, tailor-made support.

The Clayens adventure today brings together more than 5,000 women and men around the world who share common values.

Committed to an industry that combines innovation and responsibility, we embody our slogan every day.

We make no compromises. We cultivate exemplary behavior. In a constant desire to be exemplary and to be close to our customers, we uphold an honest and transparent corporate policy every day.

TRUST

REPUTATION

We strive to embody and inspire trust through our actions and attitudes. We act in partnership, honoring our commitments and encouraging internal initiative.

Our reputation is our company's most valuable asset. We strive to constantly strive to preserve it.

INTEGRITY

PROGRESS

Open to the world and focused on the future, we want to progress every day, for the benefit of our customers, our employees, and our shareholders.

ENVIRONMENT

Climate & Energy
Water & Pollution
Eco-design & Circular Economy





SOCIAL

Workers' Rights
Retention & Attraction
Social Dialogue
Well-being at Work
Development of Intellectual
Capital Diversity & Inclusion
Health & Safety at Work
Human Rights & Workers' Rights

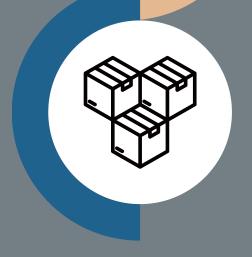
VALUE CHAIN AND PRODUCTS

Responsible Purchasing Health, Safety & Product Quality

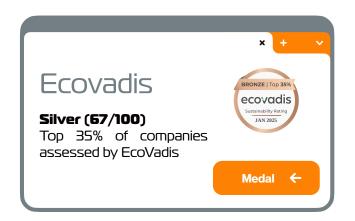


BUSINESS ETHICS

Corruption
Anti-money laundering
Fairness practices
Security & Confidentiality of information











OUR STAKEHOLDERS

Our Executive Committee maintains regular discussions with our stakeholders to inform its CSR strategy. These discussions also allow us to share performance and progress, and stay informed about changes in their CSR expectations. The Executive Committee meets monthly to analyze trends, results, and any changes to the strategy that need to be considered.

Stakeholders	Challenges	Resources made available to respond to the challenges
DtdKelloidel3	Challeriges	Resources made available to respond to the challenges
Shareholders	Keep our investors informed about our response to their CSR requirements Ensure the stability of the company. Analyze our societal and environmental risks.	CSR performance indicators communicated quarterly to our shareholders. Monthly financial report. Response to 1 audit questionnaire per year mandated by our shareholders on the improvement of our CSR approach.
Financial partners	Respect our CSR commitments to our financial partners. Be able to request financing without representing a risk.	Annual review of key performance indicators defined with our financial partners. Annual audit of our financial results by statutory auditors. Non-exhaustive quarterly financial report communicated to our financial partners. Annual reporting on indicators selected by our financial partners.
Customers	Be able to meet the new expectations of our customers in terms of reducing our carbon footprint and the development of our CSR approach. Remain a privileged partner of our customers. Ensure that we produce reliable, safe and environmentally friendly products.	Validation of our approach to reducing our footprint by the SBTi. Commitment made to our customers to reduce our carbon footprint. Active participation in working groups on energy and climate in collaboration with some of our customers. Monthly performance monitoring indicators for Group customers (complaint rate, PPM, service rate, etc.). Maintenance of our Quality and Environment certifications which are also customer requirements.
Suppliers	Raise awareness among our suppliers of our CSR approach. Develop a lasting relationship with our suppliers. Listen to our suppliers' issues	Monitoring our suppliers' commitment to the CSR approach. Monitoring our strategic suppliers' commitment to the CSR approach. Monitoring our suppliers' commitment rate to our responsible purchasing charter. Monitoring our suppliers' key performance indicators (PPM, service rate, etc.).
Social partners	Maintaining social dialogue within the Group.	Existence of CSE within our French subsidiaries as well as CSE equivalents in our subsidiaries outside France. Existence of a Group Committee (France).
Public authorities	Be able to monitor and respond to various regulatory developments linked to changes in public policies.	Carrying out comprehensive regulatory monitoring across the Group. Carrying out active monitoring of the Group's various departments in their areas of expertise Informing sites impacted by these regulatory changes before they become applicable.
Employees	Improving the quality of working life of employees. Skills development.	Deployment of a Health and Safety at Work policy applicable to all its plants. Presence of an EHS representative in each subsidiary, who leads action plans in collaboration with their management. Strengthening of the Group Human Resources Department with a person dedicated to developing skills development plans with the plants. Strengthening of training systems.

ISSUE DEFINITION PROCESS

In preparation for the CSRD, the Clayens Group has a double materiality matrix created in this year 2024.

However, the future implementation of the European Corporate Sustainability Reporting Directive (CSRD) for Clayens has been postponed to 2028, following the Omnibus Directive. Clayens will use this time to prepare to meet the expected results. Clayens will continue to monitor the CSRD update as the Omnibus Directives are released.

With the arrival of the CSRD, Clayens received support from KPMG throughout the creation of the dual materiality matrix. A project team, composed of individuals representing each pillar and ESRS, was formed by KPMG. Following this support, an action plan was developed.

This plan aims to integrate sustainability criteria into all aspects of Clayens' operations. The goal is to ensure that the company not only complies with regulatory requirements, but also takes a proactive approach to sustainability.

Identified actions include improving resource management practices, reducing carbon emissions, and engaging with stakeholders to promote a culture of transparency, and accountability. In addition, Clayens plans to strengthen its reporting capabilities to provide accurate and relevant information on its sustainability performance.

This preparation period will also allow Clayens to explore ways to transform its processes and products towards a greener and more resilient economy.

ENVIRONMENT PILLAR







Engagements	Goals	2024 Indicators
Respect the Paris Agreement	Reduce our Scope 1 & 2 by 50% by 2030, compared to 2019 validated by the SBTi	-19.5%
on our CO2 emissions	Reduce Scope 3 by 30% by 2030, compared to 2021 validated by the SBTi	-31.5% (1)
Increase the number of ISO 14001 certified plants	100% of EMEA subsidiaries ISO 14001 certified by the end of 2027	60%
Controlling our energy	Reduce our energy intensity (MWh/T transformed) by 10% by the end of 2027, compared to 2021	- 10.7%
Controlling our energy consumption	100% of our subsidiaries with an energy audit by the end of 2025	94%

⁽¹⁾ This result covers 54% of our factories.

ENVIRONMENT PILLAR









Engagements

Goals

2024 Indicators

Improve waste management and promote recycling/reuse

Achieve a 50% recycling/reuse rate for nonhazardous waste by the end of 2026

27%

Monitor and advise subsidiaries on their water consumption

Keep the water consumption ratio below 1m3/person/month.

1.58 m3/person/month

Identify, raise awareness and promote good environmental practices in terms of pollution

Deploy prevention of the loss plastic of plastic pellets into the environment at 100% of EMEA sites by the end of 2024

69%

ECO-DESIGN & CIRCULAR ECONOMY



Engagements

Goals

2024 Indicators

Promote the reduction of the environmental footprint of Clayens products to its customers

Supporting our clients in their technological breakthrough.

To be able to quantify the carbon footprint of our finished products.

Offer more sustainable alternatives to raw materials.

9% consumption of recycled or bio-based materials

SOCIAL PILLAR

WORKERS' RIGHTS







Engagements	Goals	2024 Indicators
Living wage	Pay 100% of the Group's employees above the legal minimums in force in each country where Clayens is present	100%
Forced and illegal child labor	Ensure that no minors work illegally in the Group	0 %
Health coverage	Ensure health coverage accessible to 100% of employees	100%
Good practices in social law	Train 100% of our managers on good practices in employment law with one topic covered per year by 2026 (launch primarily in France)	Launch S1 2024 in France

RETENTION & ATTRACTI	ON, SOCIAL DIALOGUE & WELL-BEING AT W	/ORK		
Engagements	Goals	2024 Indicators		
Turnover (2)	France: 10.80% Europe outside France: 16.68% Maghreb: 8.04% Mexico: 90%	France: 15.25% Maghreb: 9.34% Europe except France: 21.24% Mexico: 139.62%		
Absenteeism rate	Limit the group's absenteeism rate to 6%	4,81%		
Retention	Implement a post-hiring retention indicator by 2026: % of M.O.I. employees (1) in post after 1 year	In progress		
Employee satisfaction within the Group	Implement a group-wide social survey by 2026	Currently being developed in the EMEA zone. In place in the NAM zone for the 2nd consecutive year		

(1) M.O.I.: Indirect labor

SOCIAL PILLAR

DEVELOPMENT OF INTELLECTUAL CAPITAL



Engagements	Goals	2024 Indicators
Training	Provide 11 hours of training per year per employee	18,1h
	100% of N-1 management teams (group and subsidiaries) reviewed and 100% of group management	100%
People Review	Support 100% of "Key talents" (1) identified through an individual development plan from 2024	Under development
	Establish a network of "Experts" (2) Clayens to promote the transfer of skills by 2026	Under development
Management	100% of managers (3) trained in good management practices by 2025	Deployed across the entire group except the US
DIVERSITY & INCLUSION	5 fourteme 10 Mounts 15 SIGNS 10 Mounts	
Engagements	Goals	2024 Indicators
Feminization of management	Reach 30% of female managers by 2026	27%
Distribution Male Female	Stabilize the distribution of women/men to approach 50% as much as possible	47%
Inclusion of disabled workers	Identify and train 1 disability representative per country by 2026	Under development
No discrimination	Train HR managers and raise awareness among all managers about non-discrimination in hiring	Currently being deployed

⁽¹⁾ cf. page 146

⁽²⁾ cf. page 145

⁽³⁾ Any person who has at least one hierarchical collaborator is considered a manager.

SOCIAL PILLAR



Engagements	Goals	2024 Indicators
	Reduce the number of work accidents to 0	78
Work accidents	Maintain the Group's frequency rate below 16.29 (1)	8.64
	Maintain the Group's severity rate below 1.26 (2)	0.51
	Maintain the occupational disease frequency index below 6.2 (3)	2.75
Occupational diseases	Raise awareness among 100% of the group's managers about the concepts of moral harassment by 2026	Deployment planned for S2 2025

⁽¹⁾ Calculation: French plastics industry rate 2021 - 10% = 16.29

HUMAN RIGHTS AND WORKERS' RIGHTS



Engagements	Goals	2024 Indicators
Respect for the supply chain in accordance with the ethical and responsible purchasing approach	Achieve, by the end of 2024, 90% of strategic suppliers have signed the responsible purchasing charter	92%

⁽²⁾ Calculation: French plastics industry rate 2021 - 10% = 1.26

⁽³⁾ French plastics industry index 2021 (4) Data for 2024 is not consolidated. As part of our HRIS deployment, we also plan to integrate an e-learning platform to roll out this awareness to all our managers by 2025.

VALUE CHAIN AND PRODUCT PILLAR

RESPONSIBLE PURCHASING





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Goals

2024 Indicators

Optimize and support our strategic supplier panel to achieve CSR objectives

100% of strategic suppliers certified ISO 14 001, or having undertaken an environmental approach before the end of 2027.

57%

Optimize and support our strategic supplier panel to achieve quality and logistics objectives Continuously reduce the number of claims and associated PPMs.

Supporting strategic suppliers to achieve a supplier service rate of 95% by the end of 2027

95.5%

HEALTH, SAFETY & QUALITY

Engagements

Goals

2024 Indicators

Improve the response rate to customer requests for finished products

Process 100% of requests formalized by our customers, on our finished products, by the end of 2027.

86.8%

Improve the quality of products delivered to the customer

Reduce customer incidents by 10% per year

-8.1%

Reduce the customer PPM rate by 50% per year

-68.5%

BUSINESS ETHICS PILLAR

CORRUPTION & ANTI-MONEY LAUNDERING



Engagements

Goals

2024 Indicators

Group exposure to the risk of corruption and money laundering

Engagements

Having 0% of strategic suppliers in black zones according to the Corruption Perception Index

0%

LOYALTY OF PRACTICES

LOYALTY OF PRACTICES



Goals

2024 Indicators

Respect for competition practices

Respect the legal and CSR commitments of the Group's various stakeholders.

No alert on non-compliance with fair practices

100% of people exposed to the risks of unfair practices have signed the Group's code of ethics

SECURITY & CONFIDENTIALITY OF INFORMATION

Engagements

Goals

2024 Indicators

employees' IT Developing security skills

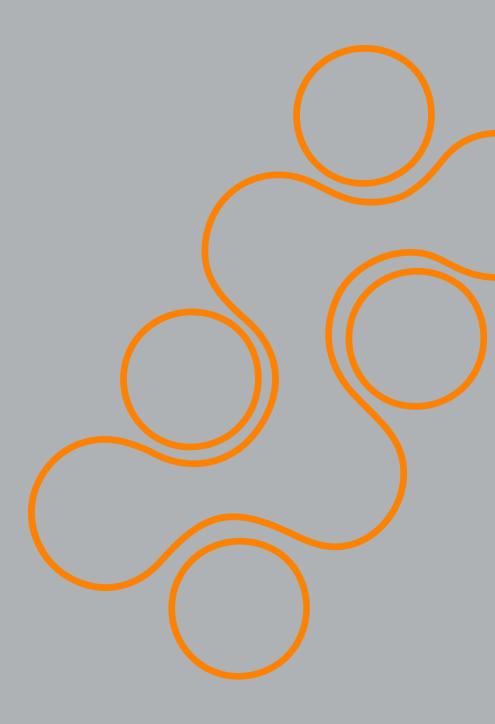
Train 100% of employees with access to IT resources in IT security by 2025

100%

Reintegrate 100% of people who failed a first phishing campaign into a second campaign

100%

GOVERNANCE



GOVERNANCE

Strategy Definition

The Clayens Group's strategy was developed at the highest level by its Executive Committee. The latter established Clayens' CSR strategy and associated key performance indicators, taking into account the challenges identified by pillar and the expectations of its Supervisory Board. The Supervisory Board is made up of the Group's shareholders and directors, some of whom are independent.

The Clayens Executive Committee reports to the Group's Chairman and CEO. This Executive Committee is composed of the CEO, the Vice Presidents of the EMEA and NAM regions, the Vice President of Finance/HR/IT, as well as the Vice Presidents of Purchasing, Engineering, Industry/Quality/EHS, Business Development, and R&D.

Strategy management

The Executive Committee draws on the expertise of the Group's various departments to implement and manage Clayens' CSR strategy. Working with specialists at each site, the Group's departments support subsidiaries in achieving established objectives.

Subsidiary departments are directly managed by the Executive Committee, which receives monthly internal reports on the progress of their CSR performance. This report allows the Executive Committee, and the CSR Committee, created in 2024, to reflect more effectively on the CSR strategy.

Monitoring and validation of the strategy

Group management communicates the results of the CSR performance indicators for which they are responsible to the Executive Committee on a monthly basis, and alerts, if necessary, to any deviations observed.

Each quarter, an assessment of the financial performance of the sites and the progress of the various CSR projects is carried out between the Executive Committee and all the departments present within the Group (Group Business Departments and plant Departments). During quarterly discussions with the Supervisory Board, the Executive Committee takes stock of the progress of the Group's CSR trajectory.

Since 2020, during the first quarter of each year, an external audit, commissioned by Clayens shareholders, has been conducted to verify the adequacy of the Group's CSR strategy. This audit is accompanied by a report providing trends on Clayens' CSR improvement.

GOVERNANCE

Specific committees

CSR Committee: Established in 2024, this committee's mission is to steer Clayens' CSR strategy. It is composed of the Executive Committee, including the CEO, as well as key experts representing the company's various functions: EHS, HR, Sales, Purchasing, R&D, Quality, Finance, and Governance. During each monthly meeting, the committee assesses the Group's CSR trajectory and discusses potential opportunities or threats.

Responsible Purchasing Committee: Created in 2022, this committee is responsible for leading Clayens' responsible purchasing strategy. It is led by the Group Procurement Quality Manager, and includes the Vice President of Procurement, the Group Procurement Director, the Procurement Quality Manager, and their apprentice Procurement Quality Technician. This committee meets biannually to review the various responsible purchasing performance indicators, which are then communicated to the members of the Executive Committee and Group management. It also validates the progress of the action plans, and the defined trajectory.

Group Social Committee (EMEA): Created in 2022 at the request of employees of subsidiaries wishing to be informed of major decisions in the Group's strategy. This committee has no decision-making power, and has a purely informative role. It is made up of the CEO of Clayens, who chairs it, the EMEA Human Resources Director, and volunteer members from the Social and Economic Committees (SEC) of the sites (one member per site with a SEC, i.e. 15 members in total for EMEA). It is planned to expand this committee to volunteer employees of sites without a SEC.

This committee meets quarterly to be informed of the Group's economic situation and major emerging trends. Minutes are prepared after each meeting and communicated to the sites via the members present.

GOVERNANCE ENVIRONMENTAL ISSUES

Governing bodies

Goals

Executive Vice President Industry, Quality, EHS Maintenance

Validates the Group's environmental policy and strategy.

Executive Vice President Engineering

Tasks the R&D Department with implementing developments that can contribute to reducing the environmental impact of products and/or processes. The R&D Committee oversees the corresponding roadmap.

Group Quality Department

Defines environmental operational procedures and standards; Conducts internal audits of the environmental process.

Group HSE Maintenance Department

Defines the Group's environmental policy and strategy; Continuous exchange with Group Management and subsidiaries; Leads quarterly HSE clubs; Support for subsidiaries in ISO 14001 certification;

Reports key environmental performance indicators to the Executive Committee monthly.

- **A** Group team is responsible for environmental issues. It is dedicated to supporting sites and sharing identified best practices.
- >>> Workshops are held quarterly with all site EHS managers. They provide time for discussion and feedback from subsidiaries on best environmental practices.

GOVERNANCE SOCIAL ISSUES

Governing bodies

Goals

Senior Executive Vice President Finance, HR and IT

Defines the Group's human resources policy on inclusion and diversity, recruitment, and talent development;
Defines rules in terms of employee data security.

General Direction Industrial, Health, Safety and Environment

Validates the Group's health and safety policy and strategy.

Group HR Department

Develop and communicate the Group HR strategy;

Define, optimize processes and digitalize them;

Deploy effective tools and procedures;

Consolidate and present data/KPIs at group level (RCM, ONB, etc.);

Support the organization's stakeholders on a daily basis; Group audit process in subsidiaries.

Group EHS Department

Defines the Group's Health and Safety policy and strategy; Continuous exchange with Group Management and subsidiaries; Leads quarterly HSE clubs;

Supports subsidiaries in carrying out their professional risk assessments and in analyzing work accidents;

Reports health and safety key performance indicators to the Executive Committee monthly.

Group IT Department

Deploys the employee data security policy; Ensures the security of the IT park; Carry out internal phishing campaigns.

Group Quality Department

Conducts internal audits of HR, Health, Safety, and IT processes

- >>> A Group team is responsible for Health and Safety issues. It is dedicated to supporting plants, sharing identified best practices, assisting sites in carrying out their occupational risk assessments, analyzing their workplace accidents, and ensuring compliance with defined rules.
- >>> Workshops are held quarterly with all plants'EHS managers. They provide time for discussion and feedback from subsidiaries on best health and safety practices.

GOVERNANCE SOCIAL ISSUES

- >>> Quarterly workshops are held with all plants'HR managers. They provide time to share information on regulatory developments and best practices.
- >>> A team is dedicated to data security and IT security issues. Its objective is to maintain and continuously improve Clayens' IT security.

GOVERNANCE ISSUES VALUE CHAIN AND PRODUCTS

Governing bodies

Goals

Executive Vice President Procurement

Defines the Group's responsible purchasing policy; Defines the strategy and issues related to responsible purchasing.

EHS Maintenance Direction

Manages safety data sheets as well as requests for certification of conformity for materials and chemical products.

Group Quality Department

Defines and deploys the Quality system and operational standards related to Quality;

Carry out internal audits of processes across all sites, and thus ensure compliance with our standards and the normative frameworks that govern us;

Site support on specific escalated issues.

Group Procurement Quality Department

Defines operational procedures and standards related to responsible purchasing;

Reports responsible purchasing performance indicators to the executive committee on a half-yearly basis, and maintains ongoing communication with central and local teams.

Group Purchasers

Deploys the Group's responsible purchasing policy within subsidiaries;

Conducts on-site audits at suppliers;

Continuous exchange with central and local teams;

Support for suppliers and subsidiaries in Purchasing activities.

- >>> A team is responsible for addressing the Responsible Purchasing issue. It is dedicated to reviewing sites and sharing identified best practices.
- >>> The results of the indicators linked to responsible purchasing are reviewed biannually, within the framework of a Responsible Procurement Committee, with a report shared with the entire Executive Committee, and the Group and plant management.
- >>> Issues related to systemic customer requirements and product quality are managed by a Group team. It is responsible for improving the Quality Management system and ensuring its deployment within subsidiaries.
- >>> An annual meeting of all site Quality Managers is held to review the actions taken and the future systemic arrangements. The meeting is supplemented by workshops aimed at reflecting on and jointly developing potential optimizations to the existing system.

GOVERNANCE BUSINESS ETHICS ISSUES

Governing bodies

Goals

Executive Committee

Defines the Group's code of ethics.

CEO
Group HR Direction
Compliance Direction

Are the referents of the Group's alert procedure on ethical and social rights issues.

Group Purchasing Direction Group Sales Direction Subsidiary Directions Enforce and ensure that all of their employees' practices are in accordance with the code of ethics;

Ensure that their employees, being the people potentially most exposed to the risks of corruption and unethical practices, are trained.

Group Information system

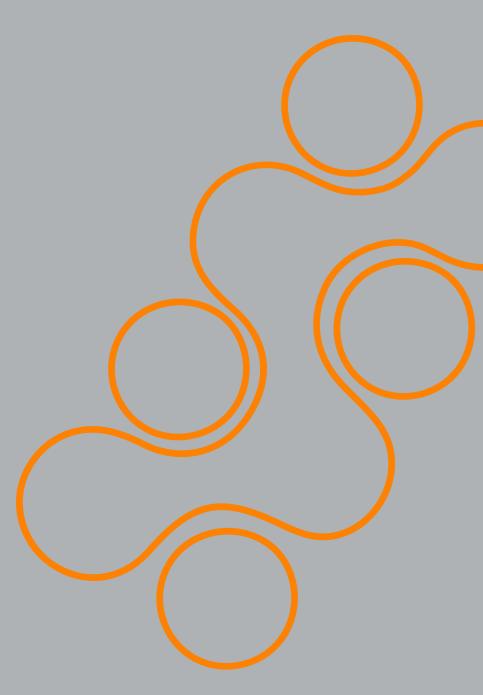
Deploys customer data security policy; Ensures the security of the IT park; Carry out internal phishing campaigns.

>>> An alert procedure, allowing any information to be reported on possible abuses of fraud, corruption and money laundering, exists within the group.

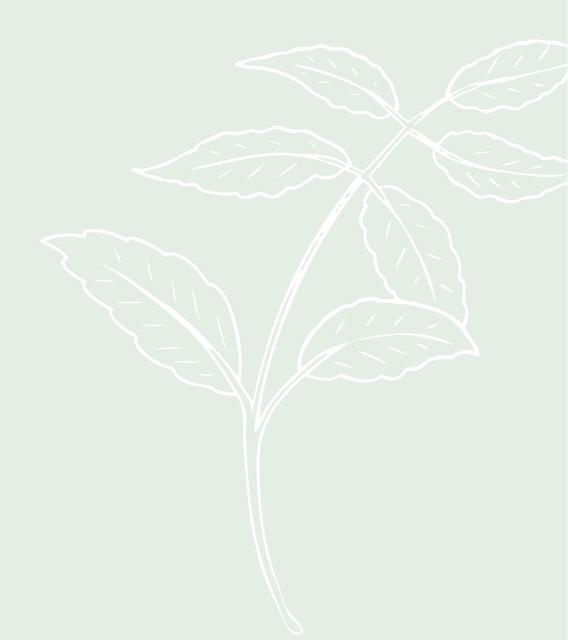
It is subject to modification, following the publication of Law No. 2022-401 of March 21, 2022, aimed at improving the protection of whistleblowers (French Law). The Group having contracted with a service provider at the end of 2024, a new platform will be made accessible to all employees of the Clayens Group in the first quarter of 2025. This platform will strengthen the protection of whistleblowers, their anonymity, and the protection of sensitive data.

>>> A map of people most exposed to the risks of corruption and unethical practices exists and is updated regularly.

ENVIRONMENTALISSUE



CLIMATE & ENERGY



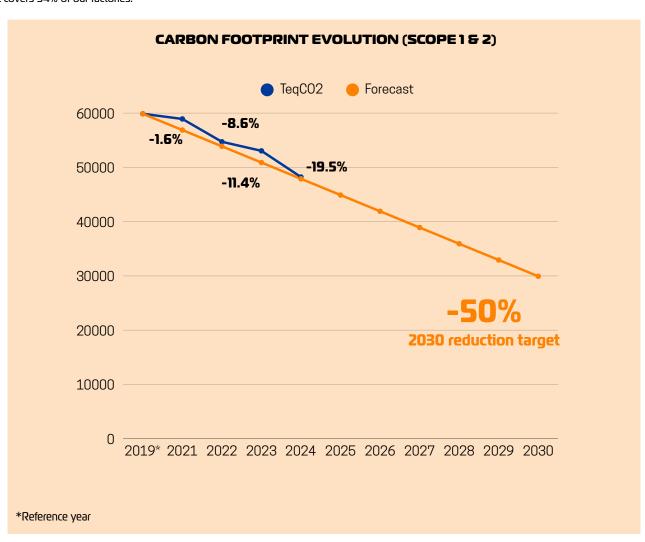
KEY PERFORMANCE FIGURES

Main emission sources of the Group 2024



Scope type	Main emission sources	Emissions GES	Comparison of TeqCO2 by car (Km)
Scope 1	Fixed and mobile combustion sources	2 618.33 TeqCO2	12 031 252 km
Scope 2	Purchases of electricity and heat	45 697.13 TeqCO2	210 004 596 km
Scope 3	Purchases of goods and services Capital goods Upstream transport and distribution	193 823 TeqCO2 (1)	890 730 699 km

⁽¹⁾ This result covers 54% of our factories.



KEY PERFORMANCE FIGURES

- >>> The share of renewable energy across the Group is 4.4% in 2024.
- 44% of the Group's plants are ISO 14001 certified, i.e. 14 subsidiaries.
 In the EMEA area, 12 subsidiaries are ISO 14001 certified, representing a certification rate of 63%.
 In addition, the NP Germany site is ISO 50001 certified.
- >>> Since 2017, energy audits have been carried out by an external service provider. By the end of 2024, 94% of subsidiaries had been audited.
- In 2024, the energy intensity of Clayens was 2.411 MWh/T transformed against 2.70 MWh/T transformed in 2021, a decrease of 10.7% (1).

CLIMATE & ENERGY

Policy

A Group environmental policy, reviewed annually, has existed since 2019. It was last updated in November 2023. No update was published in 2024. Indeed, following the implementation of the CSRD, Clayens is working internally to update its policy and is trying to implement it with all the necessary elements to meet the CSRD's expectations. It is signed by the Executive Managing Director. It is communicated internally, and applies to all Clayens sites.

Climate and Energy Issues:

- Meet the targets set by the Paris Agreement regarding GHG emissions. The Group's reduction trajectory and targets have been validated by the SBTi.
- Identify, raise awareness and mainstream good environmental practices
- Control energy consumption

Actions taken and to be taken

Since January 2021, the Group has been measuring the Scope 1 & 2 carbon footprint of all its subsidiaries. An initial Scope 3 screening was carried out in 2021 using a monetary approach.

An internal tool was developed in 2024 to enable Clayens to independently calculate its Scope 3 for 54% of its factories (Group scope as of January 1, 2023). The Scope 3 calculation was refined to include the main emission sources.

An evaluation matrix was attached to the customer's Request For Quotation (RFQ) to calculate the carbon footprint of the part to be produced. The calculation covers all stages from the manufacturing of the raw material to delivery to the customer. The goal is to raise customer awareness of the part's "carbon footprint" and thus initiate discussions and increase the Group's sphere of influence over the choice of raw materials.

Following these initial measures, Clayens Group has embarked on a process of reducing its carbon footprint in line with the Paris Agreements.

This is why, in 2022, the Group initiated a process to validate its strategy, and its carbon footprint reduction targets through the SBTi. This process concluded with a validation of the trajectory.

The first levers of action taken by the Group were on energy consumption (Scope 2) with the signing of green electricity contracts for its two Polish sites, then for its German site in September 2023. In March 2022, a solar power plant was installed on the roof of the Moroccan site, and covers approximately 8% of the site's electricity consumption.

CLIMATE & ENERGY

By the end of 2024, the share of renewable energy will be 4.4%, representing a renewable energy consumption of 6,814 MWh. Solar power plant projects are under consideration at the Hungarian and Tunisian sites.

To achieve our carbon footprint reduction goals, Clayens intends to enter into Power Purchase Agreements (PPAs). This commitment allows us to finance the development of electricity production using renewable energy sources. A study is currently being conducted for Europe, Mexico, and the United States.

Alongside the actions taken to reduce electricity consumption, the Group is working to streamline and limit its direct emissions (Scope 1). For example, to avoid fugitive emissions from its refrigeration equipment, it is regularly inspected. The inspection frequency depends on the type of gas contained and the equipment.

Gas-powered forklifts are being replaced with electric ones. Gas boiler control is optimized to meet exact consumption needs. Each time a gas boiler is replaced, an electric solution is favored to increase the electrification of our factories.

Controlling energy consumption

Controlling energy consumption has been a priority for the Clayens Group for several years. The Group is making significant investments to reduce the main energy consumption sources at its sites, such as replacing hydraulic presses with electric presses, installing refrigeration units with free-cooling technology, LED lighting, and searching for compressed air leaks using ultrasound technology.

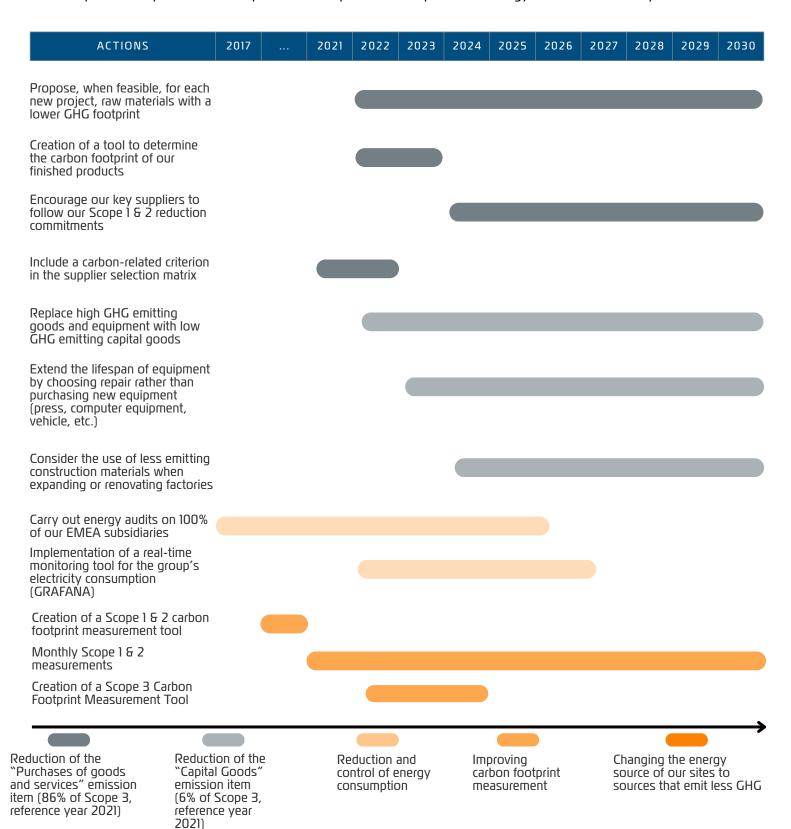
When renewing refrigeration and compressed air production equipment, the Group installs heat recovery and speed variation systems where it's possible. Since 2022, potential reductions in energy consumption and the carbon footprint of sites have been taken into account when establishing investment budgets.

To measure the potential improvement of its sites, the Group has been commissioning an external company to conduct its energy audits since 2017. Energy audits of our North American plants were completed in 2024. After each audit, the site receives a review of its energy performance, which helps identify priority areas for improvement.

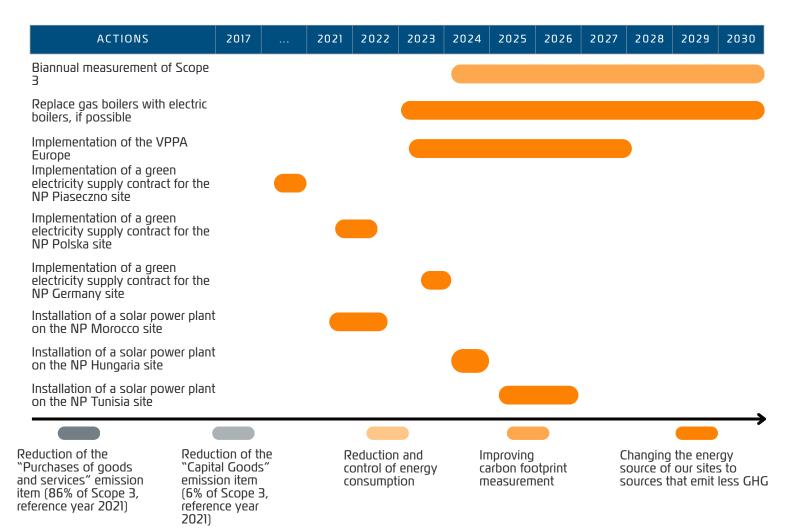
Since January 2021, all subsidiaries have been reporting their energy consumption monthly to the Group EHS Department. These results are analyzed to determine whether the Group's overall trend is on track.

RETROSPECTIVE PLANNING ON OUR CARBON FOOTPRINT REDUCTION

This roadmap was established based on the levers of action available to Clayens, but also in relation to the share represented by the different scopes of the Group's carbon footprint. This strategy has been validated by the SBTi.



RETROSPECTIVE PLANNING ON OUR CARBON FOOTPRINT REDUCTION



CLIMATE & ENERGY

Alert thresholds are in place to quickly identify sites whose results are not at the expected level, and which require additional actions. To more effectively monitor and manage the continuous improvement of its subsidiaries in the energy sector in real time, the Group has implemented an energy metering plan, based on the installation of sub-meters at 15 subsidiaries.

Written instructions, in the form of work instructions, are in place at the plants to manage production shutdowns, gradual equipment shutdowns according to shutdown durations, factory shutdowns on weekends, as well as closing days in order to ensure that energy is not consumed to a loss.

Identify, raise awareness and mainstream good environmental practices

To ensure continuous improvement and the deployment of good environmental practices that can reduce Clayens' environmental impact, the Group has committed to certifying two subsidiaries per year to ISO 14001.

To disseminate best practices and improve site performance, Clayens has raised awareness in all its factories about energy issues and their impact on carbon footprint. These training sessions cover everyday actions to reduce energy consumption. These discussions with employees on environmental and energy topics allow employees to better understand the group's policy, and thus improve corporate culture.

Environmental communication actions are in place such as displays in the workshops, stickers next to each switch to remind people to turn off the lights, as well as e-mailing.

Articles are published on the intranet to drive internal communication. The same articles are redesigned and published on the Group's website and on Clayens' various social media platforms for external communication.

This communication strategy, through these different media, allows us to raise awareness among our stakeholders on environmental issues, and thus promote the environmental actions taken by Clayens.

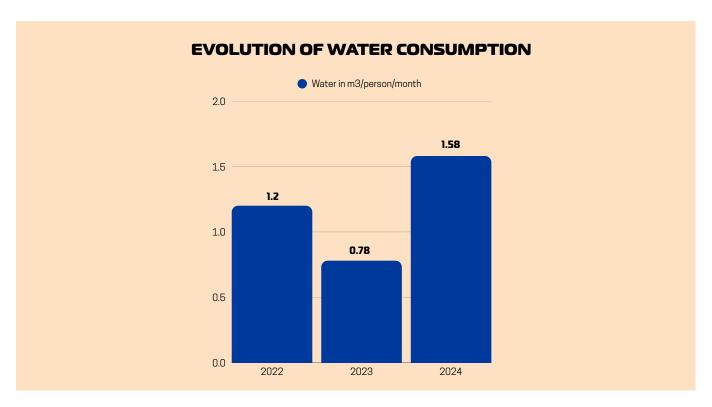
Launched in 2022, the "Clayens Environmental Day" is organized every year on World Environment Day.

During this event, poster campaigns on targeted topics are organized, and environmental awareness workshops are held. In 2024, workshops such as "Le Bar à Eaux" or "Le Chamboule-tout Carbone" were organized to educate and raise awareness about water in all its forms, and the impact of CO2 emissions. A Climate Fresco workshop took place in mid-2024, with the help of an external speaker authorized by the "La Fresque du Climat" association.





KEY PERFORMANCE FIGURES



Waste 2024

Type of waste	Weight in Tons	Weight Valued in Tons	% Waste recovered
Non-hazardous waste	11 333.43	2782.98	24.56%
Hazardous waste	579.58	35.57	6.14%
Total	11 913.01	2818.53	23.66%

- >>> 100% of the water consumed comes from the public distribution network.
- >>> The increase in the water consumption ratio in 2024 is linked to the integration of sites acquired in 2023 with more water-consuming processes.
- >>> Several of our factories have a central crusher allowing the direct reuse of certain materials, and thus, reducing the quantity of waste.

Policy

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Water & Pollution Issues:

- Monitor and advise subsidiaries on their water consumption
- Improve waste management by implementing good practices, prioritizing recycling and reuse
- Identify, raise awareness and promote good environmental practices in terms of pollution

Actions completed & to come

Monitor and advise subsidiaries on their water consumption

Since January 2021, all plants have been reporting their water consumption monthly to the Group's EHS department. The results are analyzed to identify any anomalies such as excess consumption, overconsumption, or leaks, and thus enable the rapid implementation of corrective actions.

Real-time leak detection technology is being deployed in factories. Monitoring is carried out using measuring devices placed directly on the water circuits. These devices shut off the entire water supply if a leak is detected.

The main source of water consumption at the Group's sites is sanitary water. Industrial water consumption at the Group is virtually zero, as all sites are equipped with a closed loop on their industrial water circuit for cooling. Wastewater from the sites, mainly sanitary water, is discharged into separate networks. This step separates wastewater from rainwater, and thus transports it to the nearest public treatment plants.

The discharge water from the air compressor condensates is filtered through an oil-water separator and then discharged into the rainwater network. The resulting oil-water mixture is disposed of in the same way as hazardous waste through dedicated channels.

Still with the aim of preserving the environment, our Hungarian site, which is the largest consumer of water in Clayens, has equipped itself with an OverSpray system, in open circuit, on its painting line.

This system, known as a "water curtain," captures VOC emissions from paints, recovers dried paint sludge, and also reduces the amount of water added to the system. In fact, 90% of the water used in this system is recycled, and then, reintroduced into the system.

Improve waste management by implementing good practices, prioritizing recycling and reuse

All of the Group's subsidiaries separate hazardous and non-hazardous waste. To date, there have never been any reportable hazardous waste spills into the environment.

In an effort to remain proactive, hazardous and non-hazardous waste is then re-sorted into separate streams. This step allows for the material recycling of recoverable waste. Similarly, the Group's hazardous waste is all processed in dedicated, approved streams designed to handle this type of waste. Awareness-raising campaigns for employees on the challenges of waste management are being rolled out in our factories.

When possible, Clayens directly reuses its production waste after grinding it to make injectable raw material.

The sites maintain a register to monitor the quantities of outgoing waste and the treatments they undergo.

This register also makes it possible to identify waste that requires border crossings for processing. To date, none of the group's waste is processed outside its country of origin.

To reduce the amount of soiled materials, whether rags or absorbents, plants use washable and reusable textiles through the services of an external company.

The use of this type of material for cleaning oil or chemicals can reduce the quantity of hazardous waste to be treated by around 10%.

When recycling waste materials is not possible, Clayens favors thermal recovery. At the NP Vosges site, thermosetting waste, which has a high calorific value, is transformed by an external service provider, and then, sent to a cement plant.

In an effort to promote even more types of waste, actions are being carried out at subsidiary level and at Group level to find new treatment channels.

To ensure traceability and compliance with defined treatments, specifications exist for waste management to select higher quality service providers.

These specifications also set out health and safety requirements for Clayens employees and operators of external companies. It is specified that the subcontractor undertakes to provide Clayens with equipment that complies with current safety regulations and to comply with the Group's internal rules when its operators work on the sites.

Identify, raise awareness and mainstream good environmental practices

The Group promotes feedback on environmental issues, with the aim of sharing good practices and environmental progress with as many people as possible. A quarterly EHS club is organized with the EHS representatives of the sites to share and discuss the Group's latest news and environmental trends (waste management, feedback following ISO 14001 audits, evolving issues, etc.).

The Clayens Group's pollution policy is focused on risk prevention. In addition to the environmental issues identified by the Group, ISO 14001-certified sites conduct an analysis of the environmental risks specific to their site, and context (air, water, soil, waste, etc.).

Each site manager, whether or not, they are environmentally certified, takes environmental aspects into account when establishing their strategy. These aspects are then, incorporated into specific action plans with an indicator on the progress rate, which is reported monthly to Group Management.

The primary objective is to prevent risks at source and to provide each of the Group's employees with the necessary resources and training to address these risks. This is why, in order to prevent potential soil or water pollution, spill drill tests are carried out on ISO 14001 sites.

Emergency response instructions for liquid, solid, or other pollution spills exist at the sites, based on their identified risks. Measures to reduce odors, noise, and dust emissions generated by operations have also been implemented, such as the installation of noise barriers and filters at the site outlets, where possible. Air leak detection campaigns are also carried out annually at the sites to reduce the noise emitted, as well as the electricity consumption lost by powering these leaks. The proper functioning of these prevention measures is regularly verified with analyses carried out by recognized external service providers.

The quality of discharged water is analyzed at the Group's Moroccan, Tunisian, Polish, and Hungarian sites. These sites must annually audit their aquatic discharge in accordance with their legal obligations.

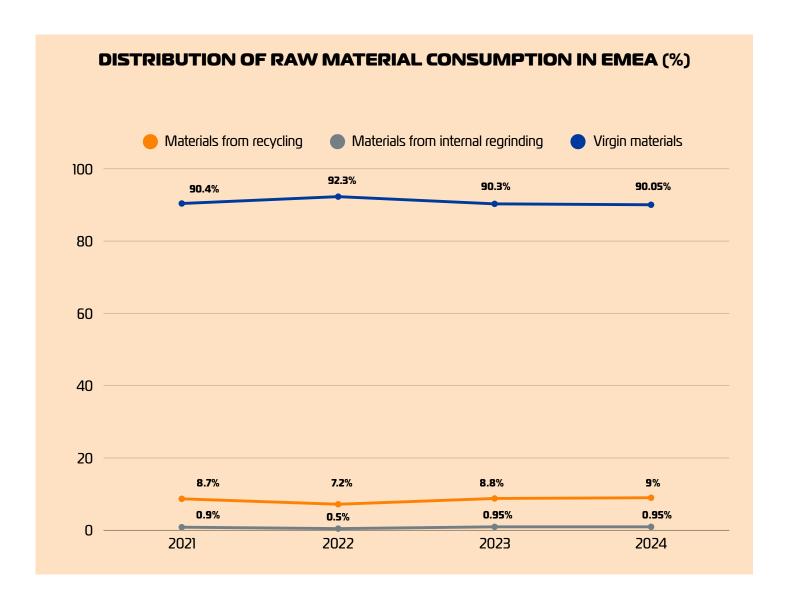
However, all sites annually analyze the quality of the water contained in the closed cooling circuits, to avoid any risk of bacteriological contamination, or accumulation of sediment, or sludge. To date, there have been no incidents of non-compliance associated with permits, standards, and water quality regulations.

As a major player in plastics processing, Clayens is facing its responsibilities regarding pollution linked to plastic pellets in seas and oceans. In 2022, 100% of the French subsidiaries affected by the GPI decree underwent an audit conducted by AFNOR. All were certified as compliant with this regulation. Unwilling to stop at the borders of its French sites, the Group has begun to deploy the prevention of GPI loss into the environment across 100% of its subsidiaries outside France in the EMEA region at the end of 2024.





KEY PERFORMANCE FIGURES



Policies

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R&D challenges:

- The R&D division takes into account the various aspects linked to the product life cycle during its co-design.
- During their development phase, project managers carry out Life Cycle Analysis approaches to determine what levers they can use with the client to reduce the impacts of the final product.

Actions completed & to come

Supporting customers to reduce the environmental impact of finished products

Clayens's business model does not allow the company to be involved in the initial design of the products it manufactures. The majority of its clients' projects are designed upstream, and the Group is consulted during the start of the project phase, and during prototyping.

However, each new product development is accompanied by the implementation of an internal LCA approach. This approach makes it possible to take stock of the stages and sub-stages of the product life cycle, on which the Group can have an impact on the project. Once this analysis is completed, and in order to reduce the project's impact on the environment, project managers can implement actions directly with the client, or at the site that will host the project.

This is why, when technically feasible and does not pose any risks to consumer safety, the Group will always favor recycled/bio-sourced materials offered by its customers, or will itself be the driving force behind offering another range of more sustainable materials to its customers. Project managers can also take steps to reduce single-use packaging by implementing a transport loop for parts in plastic containers instead of cardboard boxes. The produced parts are placed in suitable, reusable plastic containers. They are then transported to the customer, who then returns the empty containers to Clayens for reuse.

In 2022, the Group set up a working team called "Team FA 3D", which seeks to develop additive manufacturing, within Clayens.

Additive manufacturing, also known as 3D printing, allows you to create even the most complex parts by adding thin layers of material. All you have to do is create the desired part in 3D software before printing. This technology eliminates the need for specialized tooling and adapts to various projects and needs.

Today, manufactured parts are mainly used internally on various projects such as the production and inspection of molded parts. The advantages of additive manufacturing are multiple: reducing material loss, optimizing manufacturing times, gaining autonomy within the Group itself, but also producing more complex parts thanks to the custom work of 3D printing, and the design freedom offered by this technology.

The Group is also positioning itself in the design of plastic parts intended to replace parts currently produced in metal.

Here, for example, is a project developed with a French company to replace fuel pipe supports made of aluminum with plastic parts (see illustration below). The project has a dual benefit: reducing the weight by 20% with the change of material, while maintaining the part's performance.

In addition, this new product will avoid the production of metal alloy parts, the shaping of which is very energy-intensive, and for which the extraction of raw materials has a strong impact on the environment.



Process simulation

Developing eco-design to reduce the use of petroleum-based raw materials and improve the end-of-life impact of our products

For several years, Clayens has been working with its customers to incorporate more environmentally sustainable materials. From the outset, the Group's focus has been on adding recycled materials to its products. For the past five years, Clayens' efforts have also focused on the use of bio-sourced or biodegradable materials. This strategic positioning allows for both work on the upstream phase of a product to reduce the use of petroleum-based raw materials, as well as on the end of the product's life cycle to reduce the volume of plastic waste present in the environment.

Clayens is constantly striving to provide sustainable solutions to the industry. This is why, in addition to recycling its waste, the company is also focusing on using biodegradable materials.

Projects are currently underway to create coupon holders, in this case discount coupons, for supermarkets. Thanks to the switch to a compostable material, these holders can be disposed of with paper waste and subsequently composted. This new material has been approved by our client. Currently, this type of plastic is disposed of with household waste, which is neither recycled nor recyclable.

Concerned about the impact that its products can have in terms of consumption of natural resources, Clayens tracks as much as possible the percentage of recycled or regenerated raw materials.

This percentage includes the proportion of injected raw materials from recycling (waste crushed and reconditioned by a service provider), or from the purchase of materials from regenerated products. The crushed material is transformed by extrusion into wires, which are then cut after reaching the ideal temperature to obtain granules of constant dimensions.

Clayens is working on consolidating reporting, at Group level, on the quantities of waste reground internally and recycled. To date, the share of production waste reground internally and directly reused is 0.95% of the total tonnage of raw materials consumed in the Group (1).

(1) This result covers 54% of our factories.

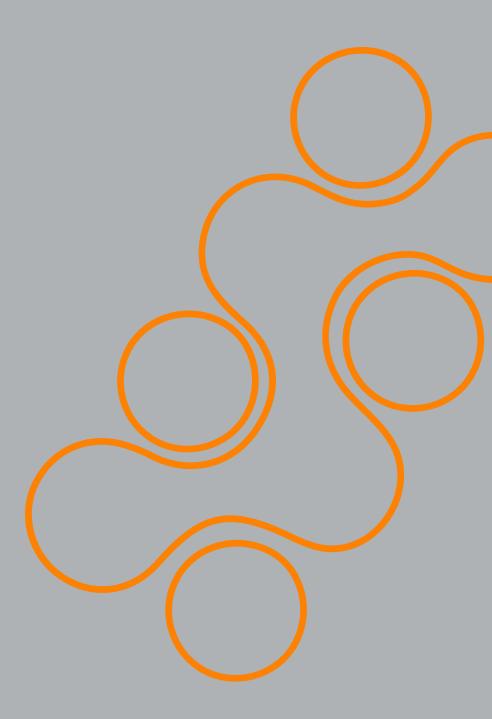
Promoting the circular economy

The purpose of this consolidation is twofold: to know the percentage of virgin raw materials consumed, and to identify any internal non-recycled waste streams that could be used as raw materials. Indeed, if a site is able to reincorporate a grade of material while another site does not recycle waste from this same grade, they are then put in contact to pool their waste, and thus have a common source of recycled raw materials.

Since 2019, Clayens has been awarded the More Label annually. Led by POLYVIA, the MORE label ("Mobilized to Recycle") rewards manufacturers who are committed to innovation and the circular economy. It is the first European label to recognize the actions of plastics manufacturers in integrating recycled plastics into their production. These materials are raw materials derived from post-industrial and post-consumer waste. Indeed, it is not Clayens' waste that is directly reincorporated, but materials from the recycling of consumer goods waste (post-consumer), and/or industrial waste (post-industrial).

CLAYENS is participating in the PLAIRE R&D project with three industrial companies and laboratories. The objective of this 4-year subsidized project is to develop a new physicochemical recycling method for parts made of dissimilar materials (e.g., PA/PP), which are currently non-recyclable. The process studied will make it possible to recycle waste previously buried, while offering materials with new properties and the lowest possible costs. This project was supported jointly by the French government, under the France 2030 Program, and the regions.

SOCIAL ISSUE



CONTEXT

2024 was a year of consolidation for Clayens following strong development in the North American area in 2023 via numerous external acquisitions.

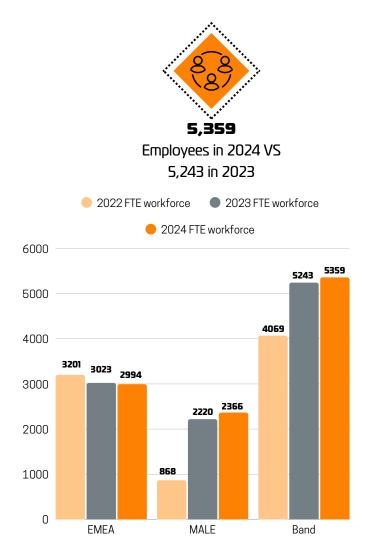
Following the acquisition of 13 manufacturing sites in the USA and Mexico the previous year, Clayens continued to strengthen its aeronautical activities in 2024 by integrating the company Saimap-Viennot in July, which specializes in this strategic market.

The group continued its structuring by carrying out site consolidation projects, enabling it to have more robust factories.

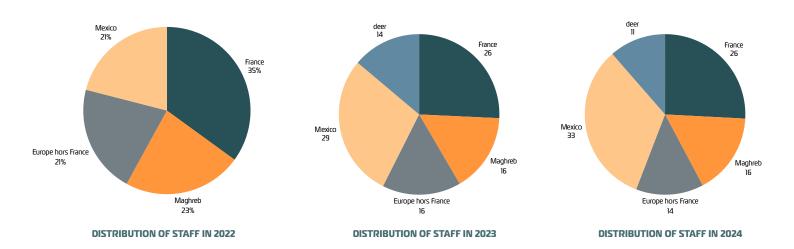
This year proved essential for continuing the successful integration of recently acquired subsidiaries, the deployment of Group processes and the progress of key HR projects such as the implementation of a global HRIS.

2024 was also a year of strengthening the Group's corporate culture, notably through the alignment of the names of our legal entities and the Clayens brand.

Clayens, which experienced a growth in its overall workforce of 28.8 points in 2023, stabilized its physical growth in 2024.



FTE: Full-time equivalents



CONTEXT

At the beginning of 2023, as part of its development, Clayens launched a major project: the deployment of its HRIS across the Group (Success Factors*). The year 2024 allowed for its implementation to continue by aligning HR processes between subsidiaries and countries.

A true collaborative tool for employees, managers, and HR, the HRIS will streamline relationships and information sharing between everyone. The goal is to empower employees to be active participants in their career at Clayens, and to empower managers to be more involved in the management, monitoring, and development of their teams.

This large-scale project has numerous objectives:

- Align our HR processes across all Group sites by promoting the successful integration of our new subsidiaries;
- Improve the employee experience: a unique tool providing instant access to all of their information;
- Supporting our management teams: simplified management of our "People Management Cycle";
- Modernize our current processes: abandonment of paper forms and Excel files, reduction in the number of emails;
- Optimize administrative management: reduction of low added value tasks, reduction of the risk of error;
- Making data reliable: reliable data enabling real-time analysis of our data;
- Ensuring our compliance with the GDPR: centralization and security of this personal data.

The schedule for implementing Success Factors at Clayens has been respected, and is taking place in two phases:

- 1. Pilot phase completed: configuration and deployment on the pilot sites: Clayens Genas, Clayens Jura, Clayens Poland, Clayens Slovakia, Clayens Hungary, and Clayens Morocco.
- 2. Deployment to other subsidiaries of the group in progress.

Several modules have been identified as mandatory for all Group subsidiaries: Core HR, Recruitment, Onboarding, Performance and Objectives, Succession and Development, Compensation and Training. In addition to these modules, the People Doc** solution will be deployed in parallel to ensure the proper management of employee files.

To ensure the best possible experience for everyone, everything is translated into the Group's different languages.

Once fully deployed, interfaces with local payroll systems will be studied, with the aim of automating the transfer of information and avoiding double entry (reducing the risk of error). The first interface project will concern French sites, which have a centralized payroll system and team.

<u>Deployment Status:</u> By the end of 2024, the configuration of all these modules will be carried out in collaboration with our pilot sites. The implementation of Core HR, Recruitment and Onboarding, Performance and Objectives, Compensation and Training, and People Review modules has been completed at these sites. The second wave of deployment will be launched at the other European subsidiaries in 2024.

The launch of the project for the Mexican sites is planned for the first half of 2025. Alignment with the United States is planned for the second half of the year.

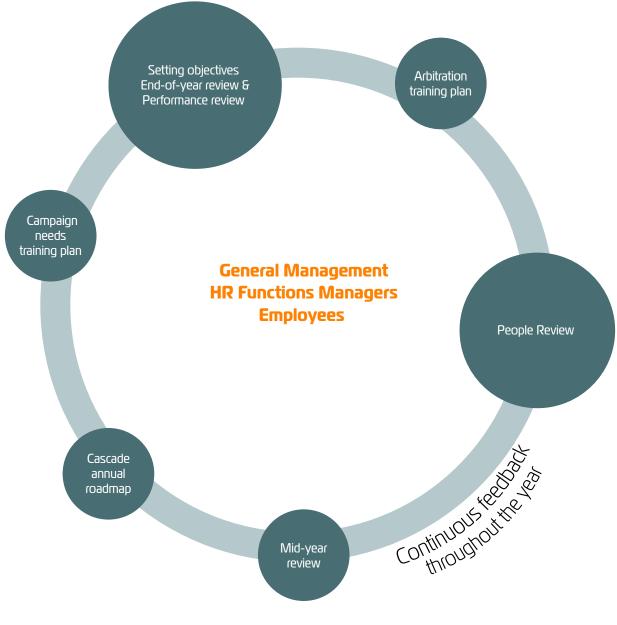
^{*}Success Factors: Name of the HRIS solution from the publisher SAP

^{**}People Doc: Cloud platform (SaaS) for centralizing HR documents

CONTEXT

In conjunction with its HRIS implementation project, Clayens is continuing to align HR processes globally through the implementation of a "People Management Cycle": a common HR management cycle. The goal is for this to be effective by the end of 2025, when Success Factors will be rolled out across all of the group's subsidiaries.

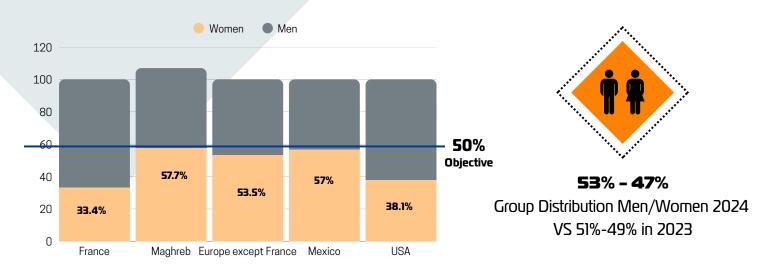
"PEOPLE MANAGEMENT CYCLE"*



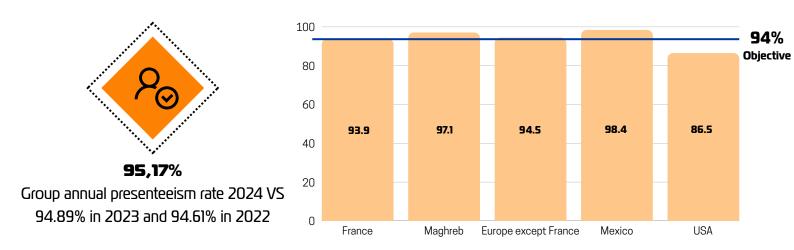
^{*}People Management Cycle: HR management cycle

OUR HUMAN RESOURCES IN A FEW FIGURES

MALE/FEMALE DISTRIBUTION IN 2024 (%)

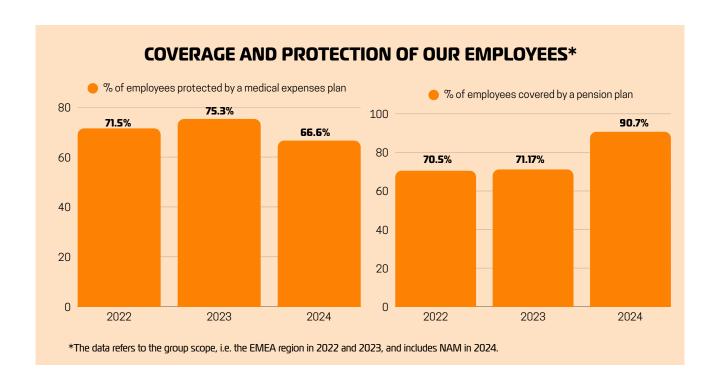


ANNUAL PRESENTEEISM RATE IN 2024 (%)





KEY PERFORMANCE FIGURES



>>> A working group was set up in 2022 to look at employee benefits and medical expenses, with a view to ensuring comprehensive social protection for all Clayens employees. Currently, benefits and medical expense coverage are negotiated annually, with the necessary legal documentation.

Following the integration of our subsidiaries in the NAM region, the project was expanded with the aim of rolling out a multinational pooling* system across the entire group. In 2024, three additional countries joined the pool: Mexico, Hungary, and Poland. These countries join France and Slovakia.

We are actively continuing our work on this issue in order to offer employees the best coverage, tailored to local needs and at the best prices. This approach is part of our commitment to continuously improving social protection within the group.

The aim of this project is to pool the results of our various international social protection contracts, enabling our Group HR teams to manage them more effectively and move towards harmonizing the coverage offered to our employees. This system will allow the results to be pooled in an international profit-sharing account. In this way, beneficiary countries will compensate for any losses incurred by deficit countries, and any profits will be redistributed to local entities.

>>> In 2024, no children worked illegally within the Group. This result is identical to previous years.

NB: Within Clayens, the term "child" refers to a minor under the age of 16 who is authorized to work, provided they do not perform hazardous work. Indeed, according to the International Labor Organization, these people must be supervised by an apprenticeship or work-study contract (France). In 2023, two apprentices under the age of 18 were hired in compliance with this legal framework.

^{*}Multinational pooling system: system allowing the pooling of health insurance coverage placed in several countries

Policies

A Group HR policy exists and applies to all Clayens sites. It is reviewed annually. It was last updated in October 2023. In 2024, no update was published: following the implementation of the CSRD, Clayens is working on a complete overhaul for 2025. The policy is approved, and signed by the Executive Managing Director. It is then communicated internally to our employees.

Issues Workers' Rights:

- Ensure respect for workers' rights
- Raise awareness and inform employees about their rights

Actions completed & to come

Ensure respect for workers' rights

The Clayens Group has adopted a Group Human Resources policy to ensure that employee rights are respected, regardless of their location.

Given the numerous risks of human rights violations within multinational companies, Clayens is aware that it has a responsibility to respect these rights. To be consistent with these values, the company attaches importance to the positive role it can play within the communities in which it operates. To achieve this consistency, the conduct of its international activities is consistent with the United Nations Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. This commitment is reflected in Clayens's membership in Global Compact since 2004.

Each employee of the Group benefits from an employment contract, which includes the employee's date of birth, as well as a job description. Photocopies or scans of the person's identity documents are requested to verify the employee's age, and thus, prevent illegal child labor. It is never required to provide the originals to employers. This avoids the risk of identity documents being withheld and the promotion of any undeclared and/or forced labor. Any changes to an employee's job description are made after consultation and agreement with the employee.

Based on these same principles, the Group assumes its duty of vigilance with regard to child labor and forced labor within its organization, but also among its subcontractors.

Clayens defines "child" as any person under 18 years of age, according to the standards of the International Labour Organization.

The Group may authorize persons under the age of 18 to work in its production sites, only if they are over the age of 16 and do not perform hazardous work, as defined by the ILO. These persons are covered by an apprenticeship or work-study contract, the clauses of which must be respected by the company.

A performance indicator is managed by the Group Human Resources Department to ensure that no child works under illegal conditions (no contract, night work, working hours exceeding the legal requirements in force). In 2024, no child worked at Clayens outside the legal framework. This result is the same every year.

To ensure a decent wage for all its employees, Clayens implements a salary policy that goes beyond the social minimums in force in each country where the group operates. The rules applicable in each country take into account local realities and the sector of activity, while respecting the principle of fairness.

All sites outside France have salary scales for each position, in compliance with local regulations. Comparisons with compensation studies are also made.

The Group's human resources department ensures salary consistency between contracts through an annual review.

In addition, in France, each site sets its social minimums by following the collective agreements for the trades that concern them (plastics or metallurgy), and follows the various legal developments that apply.

Raise awareness and inform employees about their rights

Upon arrival at Clayens, each new hire receives a set of documents that they must read. After reading them, they agree, upon signing, to follow the instructions outlined.

The documents sent to the new arrival include:

• The Group's IT charter

It is adapted according to the legislation of each country where Clayens operates. The charter specifies the rights available to users within the company.

The Group's Code of Ethics

A cornerstone of Clayens' core principles, the Code of Ethics must be read by all employees, and signed by our executives and department heads. The code outlines the requirements for exemplary conduct and ethics, based in part on labor law, which must be respected.

The code of ethics must also allow employees to question practices, while providing decision-making support. As part of our HRIS implementation project, and in particular our "Onboarding" module, new M.O.I.* employees will have access to the Group's Code of Ethics in their language for signature, via their Onboarding platform, even before their integration into the company.

Under the Sapin II law (French law), a global alert procedure is in place with a confidential email address. This is mentioned in the Code of Ethics.

The purpose of this procedure is to give the opportunity to any natural person, staff member or external and/or occasional collaborator of the company (temporary staff, interns, service providers, employees of a subcontracting company, etc.), to reveal or report, in a disinterested and good faith manner, a crime or offense, a serious and manifest violation of the law and/or the Clayens code of ethics; or any serious threat to the general interest of the company of which they have personal knowledge. This whistleblowing procedure allows, for example, the reporting of potential problems of child labor and/or forced labor. This system has been communicated to all employees, and is recalled in the internal regulations. Alert monitoring is in place. The entry point for these alerts is the CEO as well as the EMEA HRD.

An upgrade to this system is planned for early 2025. As part of a drive to strengthen transparency and compliance, Clayens plans to upgrade its whistleblowing system. The system will be outsourced via a secure, multilingual platform. This solution will ensure confidential, independent management that complies with regulatory requirements, while providing everyone with a reliable and accessible reporting channel.

The internal regulations of the host site

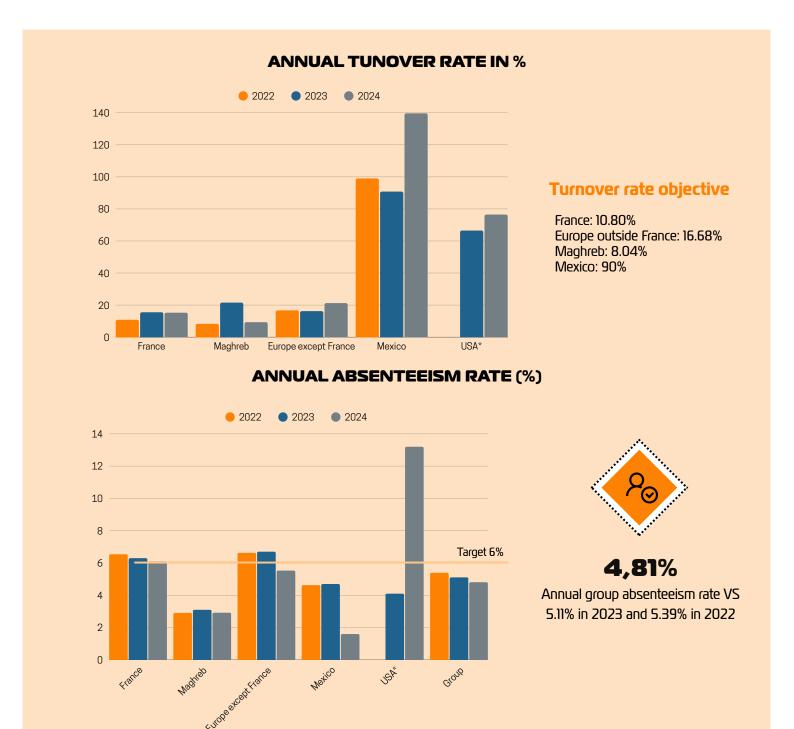
It governs the rules regarding health, safety, and discipline within the host company. It also informs employees of their rights, and specifically mentions the whistleblower protection system.

The Group's employees also receive awareness sessions on sexism, as well as on moral and sexual harassment, upon their arrival and whenever legislation changes. These sessions cover the concepts of the right of withdrawal in countries where it applies, as well as the right to report. These sessions are directly integrated into the onboarding awareness sessions in the form of classroom presentations.

With the aim of raising maximum employee awareness of safety and related law, 100% of French sites have organized external training on the roles and responsibilities of managers in Health and Safety. This training includes, among other things, a module on the regulatory framework for Health and Safety, more specifically focused on labor law, and on the civil and criminal liability of managers. The goal is to inform staff supervisors of their rights and obligations as team leaders.

RETENTION & ATTRACTION, SOCIAL DIALOGUE & WELLBEING AT WORK

KEY PERFORMANCE FIGURES



>>> The context of Clayens' numerous acquisitions in 2023 had a significant impact on the group's overall turnover rate. Regarding the Mexico region, this turnover rate mainly concerns operators. Our factories are located in highly competitive areas. In recent years, the Mexican government has increased the minimum wage every year: +22% in 2022, +20% in 2023, and +12% in 2024. So even though we apply a wage policy above the legal minimum at all our sites, these increases tend to diminish the impact of our actions.

*No retroactive consolidation for USA sites in 2022.

We implemented exit interviews to pursue a more detailed analysis of the issue. In Europe, the voluntary departure rate is 4%. The main reasons are natural: work-home distance, moving, and external job changes.

NB concerning the absenteeism rate: The data for the Mexico region in 2022 includes our subsidiary NP Plastibell North, i.e. 471 full-time equivalents (FTE) on average over the year, versus 1,503 FTE in 2023 due to the acquisitions made and 1,754 in 2024. Regarding the USA, the data is not taken into account in 2022 due to the completion of the acquisitions at the beginning of 2023.

RETENTION & ATTRACTION, SOCIAL DIALOGUE & WELL-BEING AT WORK

Policies

A Group HR policy exists and is reviewed annually. It was last updated in October 2023. No updates were published in 2024. Indeed, following the implementation of the CSRD, Clayens is working internally to update its policy and is trying to implement it with all the necessary elements to meet the CSRD's expectations.

The policy is approved and signed by the Executive Director. It is then communicated internally and applies to all Clayens sites.

Issues Retention, Social Dialogue & Well-being at Work:

- Encourage social dialogue and collective bargaining
- Guarantee and improve working conditions and work-life balance

Actions completed & to come

Encourage social dialogue and collective bargaining

For Clayens, managing social dialogue and the progress it generates has always been a major challenge. To date, Clayens complies with six regional collective bargaining agreements in France (plastics and metallurgy), as well as equivalent agreements in countries outside France.

These conventions define:

- The working conditions to be respected by the employer (maximum working time, minimum rest period between 2 shifts),
- The right to training and professional development,
- The right to join a staff representation committee (union, CSE),
- Guaranteeing compliance with legal safety conditions (provision of personal protective equipment, safety training, provision of a health and safety committee).

Social relations are decentralized, and conducted in each country in compliance with the rules of staff representation.

All French sites have a Social and Economic Committee, whose members represent staff, and are elected by employees. Similar organizations exist within our subsidiaries Clayens Morocco and Clayens Tunisia.

Even if they are not included in specific committees, all of the Group's sites have staff representatives.

In France, at least 6 Social and Economic Committee (SEC) meetings and 4 CSSCT meetings are held per year. For sites outside France, social committees meet at least once per quarter. In parallel with these local staff representation committees, in France, a Group Committee was established in December 2022 (French sites). This Committee receives information on the financial situation, trends, annual or multi-year employment forecasts, and on preventive actions related to these forecasts.

Salary negotiation meetings are held annually between plant management and employee representatives. The conclusions of these meetings are communicated to all employees through minutes. Following the decisions made, the salary scale review and salary scales are communicated to all employees.

RETENTION & ATTRACTION, SOCIAL DIALOGUE & WELL-BEING AT WORK

The Group remains on the lookout for possible changes to the various collective agreements in order to anticipate the necessary compliance actions.

Group-wide actions are also being taken to negotiate agreements applying to all Clayens employees, and enabling their social benefits to be improved.

Guarantee and improve working conditions and work-life balance

Clayens is committed to ensuring that each employee receives fair working and rest time. Across the Group, production operates on a work schedule (2 x 8-hour or 3 x 8-hour shifts) depending on the production site and workshop.

Working hours are monitored using time clocks, and overtime is paid. Working and rest periods are in accordance with collective agreements or internal regulations.

Similarly, to ensure the balance between employees' professional and personal lives is as fair as possible, leave agreements are established at each site, in compliance with local regulations. In France, working time reduction agreements are in place, in addition to the paid leave days provided for by law.

In the EMEA region, the Group's sites close for at least two weeks in August and one week in December.

In France, a teleworking agreement was negotiated in 2022 and subsequently implemented on the majority of sites in France.

Closure cycles are defined by each site, and social partners are informed in advance, including about any additional schedules that may take place during the year. To maintain respect for our employees, a disconnection agreement exists to ensure each employee's privacy.

In France, to ensure that day-rate executives enjoy a good work-life balance, mandatory interviews are conducted annually.

With the aim of improving the working conditions of its employees, Clayens has implemented a health and safety policy at work, including a workplace ergonomics component (see Health & Safety at Work).

To facilitate the deployment of ergonomic studies across all its sites, the Group developed a simplified job study and musculoskeletal disorder screening tool in 2024. The tool was subsequently distributed to all Group sites. Employees with sedentary work are made aware of the risks of working on screens and the ergonomics of an office workstation. As part of occupational risk assessments, psychosocial risks are also assessed to identify which positions would be most exposed.

An "exit" questionnaire for resigning employees was also developed in 2022. This allows us to identify and analyze the main causes of voluntary employee departure. Through this practice, Clayens aims to improve and increase its chances of retaining key talent. The tool was launched in 2023 at a few pilot sites in the EMEA region, then extended in 2024 to the entire EMEA region. A study of its deployment in the NAM region is planned for 2025.

RETENTION & ATTRACTION, SOCIAL DIALOGUE & WELL-BEING AT WORK

With the aim of continuous improvement, employees can express their opinions and ideas to improve their working conditions. This can be done in two ways:

- Directly, during exchange meetings with their management which take place according to frequencies
 determined by the sites themselves (quarterly to annual). These meetings are an opportunity for
 management to communicate company trends on different themes, but also moments of free expression for
 employees with their director(s), particularly on their working conditions;
- Indirectly, through a system of award-winning improvement proposals (financial compensation) in place, allowing employees to express themselves on different themes: improving working conditions, achieving energy savings, improving costs, improving workplace safety, improving quality, improving productivity.

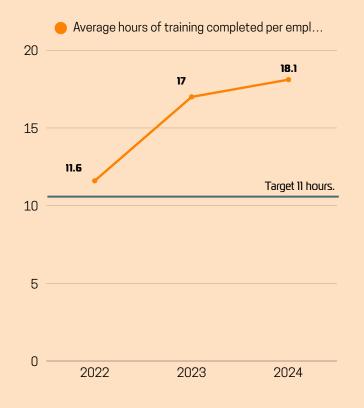
Some sites highlight a theme for a specific period and double the bonus amount. Additionally, some plants offer a podium system with a prize ceremony to encourage employee engagement.

Company agreements regarding holiday and end-of-year bonuses are in place at the sites. These bonuses are linked to presenteeism: the amount paid is indexed via a detailed scale and communicated to all employees. At some sites, calculation processes are in place to compensate employees based on company profits, but also on quality and workplace safety performance indicators.

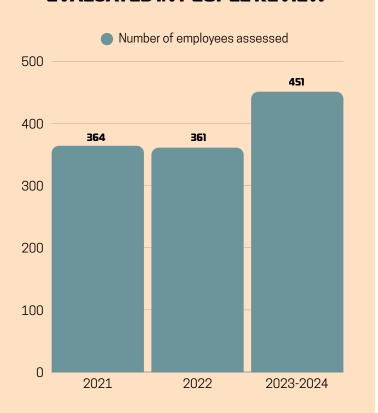
ATTRACTION & DEVELOPMENT OF INTELLECTUAL CAPITAL



TRAINING HOURS PER EMPLOYEE



NUMBER OF EMPLOYEES EVALUATED IN PEOPLE REVIEW



By 2024, the number of training hours per employee will be 18.1 hours, with a target of 11 hours per employee. Clayens continues to make progress on this issue and aims to go further by democratizing the use of e-learning platforms. For example, employees of American entities benefit from e-learning access via the ADP HRIS system.

A group-wide online cybersecurity training solution was implemented in April 2024. All training delivered through this

A group-wide online cybersecurity training solution was implemented in April 2024. All training delivered through this solution is mandatory for employees and included in the employee training program. Clayens is exploring the possibility of using this same solution in 2025 as part of the rollout of compliance training.

>>> In 2022, 100% of directors (Group and subsidiaries) and Site department managers were assessed in a people review.

In 2023, and as part of the start of the alignment of our subsidiaries with the new "People Management Cycle" planned for 2025, the HR Department teams postponed the People Review to April 2024 (instead of October 2023). This was carried out, and 100% of the directors (Group and subsidiaries) and plants department managers were evaluated.

This shift in the campaign allowed us to work on the continuous evolution of our process.



Policies

A Group recruitment policy exists and is reviewed annually. It was last updated in October 2023. In 2024, no update was published. In 2024, no update was published: following the implementation of the CSRD, Clayens is working on a complete overhaul for 2025. The policy has been validated, and signed by the Executive Managing Director. It is communicated internally and applies to all Clayens sites. A recruitment process and a staff development process are in place at the Group level to enable global organization and recruitment consistency.

Challenges Attraction & Development of intellectual capital:

- Attracting talent and facilitating employee integration
- Detect internal talent and train employees

Actions completed & to come

Attracting talent and facilitating employee integration

Talent management within the group has become a major challenge in Clayens' human resources strategy. With the acquisition of new entities and the evolving job market, the Group must position itself to identify key talent, transfer skills, and attract new generations of employees.

Since 2022, Clayens' HR department has expanded to implement globalized processes in terms of recruitment, skills development, tools, and a global strategy. Best practice guides are attached to the process and are available to users ("Phone Interview", "Interview Guide", "Reference Checking", etc.).

To support these changes, in 2022 Clayens adopted an ATS (see Glossary) for recruitment in France in order to centralize candidate data, multi-disseminate our advertisements, and ensure better monitoring of our candidates. As part of the deployment of the recruitment module of our HRIS, this process evolved in 2024 for more automation, active participation from managers and internal control (multi-level validation workflow).

In addition, the career site evolved into an automated system linked to our HRIS. An internal career site was also set up, offering complete visibility of opportunities within the group to all employees. The primary objective is to be able to develop the internal mobility of our employees.

In this effort to strengthen and manage internal mobility, Clayens implemented an "Internal Mobility Charter" in September 2024. This defines the general principles of mobility within Clayens, whether at the initiative of employees, on the proposal of the employer, or resulting from a departmental reorganization within all Group companies. It embodies Clayens' desire to promote mobility and support its employees in their development projects. This charter is intended for employees of the group from the validation of the employee's trial period. The recruitment process is identical for all candidates, whether internal or external.

For positions open to mobility, group employees benefit from priority review of their applications over external candidates. With equivalent skills and qualifications, internal applications will systematically be given priority over any other external choice. Finally, Clayens has implemented support for geographic mobility through an external partner.

This is paid for by the employer and takes the form of a personalized mobility pack covering: finding accommodation, assistance with moving (preferential rates), and accommodation, provision of targeted information on the new environment (schools, administrative formalities, assistance with spouses returning to work, etc.).

While a referral bonus system may be in place in some subsidiaries to encourage employees to recommend people from their network, one of the objectives of the Clayens HR Department is to work towards establishing common agreements (by country or region, or even globally). The HRIS recruitment module provides for the consideration of a possible referral system.

Similarly, new bonus processes (profit-sharing bonuses, performance bonuses, profit-sharing agreements) have been implemented at French sites in order to best meet the new expectations of candidates.

For three years now, Clayens has been undertaking in-depth work on its employer brand. In 2022, a multidisciplinary working group (HR, EHS, and Communication functions) led a thorough reflection on Clayens' values: Trust, Reputation, Integrity, and Progress, as well as its promise "A World of Opportunities"*. Since then, Clayens has strengthened its internal and external communication around these elements. Attractiveness is also reinforced thanks to communication carried out by its employees on social networks during charitable actions linked to local associations, or during awareness-raising campaigns. The harmonization and strengthening of internal communication has notably involved the deployment of a common tool allowing each subsidiary to have document templates available, and easy access to the Group's graphic charter.

The new employee onboarding process was also reworked in 2023 with the implementation of a "Welcome Book" at a pilot site in France, accompanied by a sponsorship system. Following positive feedback from the tool, in 2024, templates were made available to other subsidiaries for adoption of the system by adapting it to their operations. This document is now strongly recommended for all our sites.

New hires are provided with a comprehensive, personalized onboarding guide prior to joining the company. It includes key information about Clayens: its website, values, processes, tools available, advice and best practices, and the contact details of their mentor.

The appointment of this person is made by the manager. His/her main mission is to guide, and support the new recruit in their first steps at Clayens, to facilitate meetings with other departments so that the new employee can build an initial internal network, and thus, help them in appropriating the group's culture.

In addition, enhanced monitoring of the employee's skills acquisition is carried out when they take up their position, as well as feedback on their integration through a surprise report.

During the first four months following hiring, a monthly interview is conducted between the manager and the employee to assess the acquisition of their skills, determine the necessary knowledge to develop, and any training areas to be planned for the employee. This interview is formalized through an internal document within the Group, and is sent to the Human Resources department of the site concerned. After the four months, this interview is then conducted every two months until all the skills have been acquired.

Detect internal talent and train employees

Since the implementation of a "People Review" process within the group in 2021, the HR Department teams have developed tools to identify our potential talents internally, with the aim of objective assessment. The population reviewed concerns all members of the Management (Group teams and subsidiaries), as well as all their N-1 (managers or not). It may, in specific cases, include certain key N-2 positions.

The "People Review" at Clayens is designed as a key and proactive process in its development policy, allowing it to combine the aspirations, potential, and performance of employees on the one hand, with the needs of the company on the other. A true operational tool, one of the other objectives is to address short-, medium-, and long-term organizational challenges: replacement and succession organizational charts, unfilled positions, risks of knowledge loss, critical positions, etc.

A salary potential assessment grid has been in place since 2022. In a spirit of continuous improvement, it was revised in 2024, and will be digitized via the People Review module of the HRIS. This assessment is completed by the manager/HR duo for each of the employees concerned. The grid assesses the employee's potential based on criteria important for the employee's development within Clayens: strategic vision, change management, intellectual agility, and relational agility. Using a scale based on 16 sub-criteria, but also on the evaluation of performance and compliance with the group's values, the employee can be identified or not as Key Talent or Expert (see Glossary).

In 2024, the People Review process was expanded to further refine this detection process. In addition to the review by the Manager/HR team, the matrix manager now participates in the discussions. A personality assessment questionnaire was also proposed for employees identified as potential Key Talents. This online questionnaire analyzes personality traits, motivational levers, and decision-making. It allows, among other things, to improve our understanding of how our talents function: their strengths, their goals, what motivates them professionally, as well as the management expected of them.

At the end of this People Review process, a consolidated conclusion is communicated to members of management and HR teams, as well as the associated action plans at group level.

This conclusion and its associated action plan must complement and become a basis for the construction and deployment of action plans at regional and local levels.

Since 2022, a particular focus has been placed on leadership development: senior executives in the first year, managers in the second, and supervisors in the third year. As such, all managers in the EMEA region received management training between 2023 and 2024. Similar training was rolled out across all Mexican sites in 2024, aligning concepts and tools to deploy a common management culture.

In the EMEA region, this training consists of 35 hours of learning over a period of 9 months. It is structured around individual coaching sessions, face-to-face training sessions, e-learning modules, and evaluation questionnaires.

In Mexico, the format has been adapted into a 32-hour face-to-face format, supplemented by 3 e-learning sessions in between sessions, and 3 coaching/mentoring sessions.

The key elements covered include empowering your team, embodying managerial courage, the ability to say no and announce a difficult decision, eurythmic communication, setting SMART* objectives, developing confidence and motivation, conflict management, and recruiting and integrating new employees.

Progress report

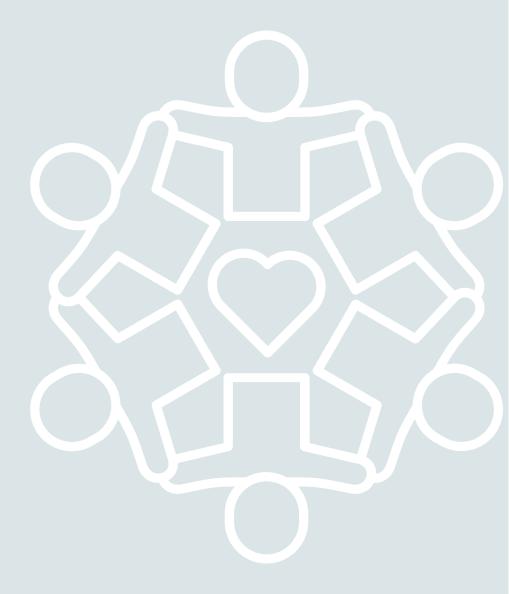


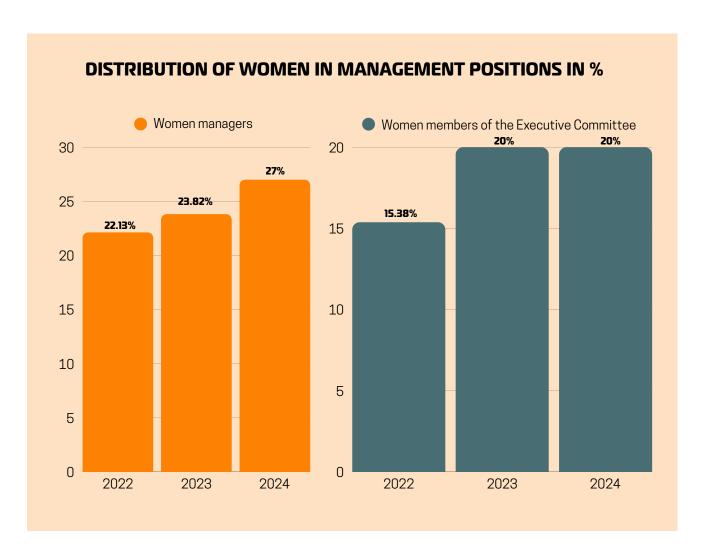
At the same time, the implementation of awareness-raising and legal monitoring actions for our HR Managers in France was also deployed in 2024 through an external partner, pending the arrival of a Social Law Lawyer planned for early 2025.

Individual and professional interviews are held annually, or every two years depending on the country, across the Group. During these interviews, the manager and the person being managed discuss, among other things, the latter's training needs and career development expectations. As part of the implementation of our future HRIS, interviews will be made annual and digital for MOI employees.

Training programs for all staff are in place at each of the Group's sites with a collection of overall needs over the months of September and October.

A performance indicator with a training monitoring objective, in terms of the number of training hours provided per employee per year, is included in our KPIs. This indicator is managed at each site and consolidated by the HR department. To provide feedback and subsequently improve the training offered to employees, each participant completes a satisfaction questionnaire upon completing the training, then a second one three months later (both on-the-spot and off-the-spot evaluations), for more constructive feedback.





- >>> In 2024, as in 2023, 20% of the members of the group's Executive Committee were women, compared to 15.4% in 2022.
- >>> In 2024, 27% of managers across the group were women, compared to 23.8% in 2023.
- In 2024, 86% of our French subsidiaries concerned by the calculation of the gender equality index (companies with more than 50 employees) obtained an index above 80%.
- >>> 80% of sites in the EMEA region have a sexual and gender harassment contact person. A review is underway in the NAM region, with the aim of rolling out a similar system.
- In 2024, there were 81 disabled workers in the EMEA region and 11 in the NAM region, making a total of 92 across the group. Employees with disabilities are subject to special monitoring (in collaboration with Occupational Health for our French subsidiaries). Workplace adjustments are made when necessary.

Policies

A Group Code of Ethics and Disability Policy exist and are reviewed annually. They were last updated in March 2023. No updates were published in 2024. Indeed, following the implementation of the CSRD and a desire to overhaul these documents, Clayens is working internally to update its policy and is trying to implement it with all the necessary elements to meet the CSRD's expectations. The code and policy are approved and signed by the Executive Managing Director. They are communicated internally and apply to all Clayens sites.

Diversity & Inclusion Issue:

- Facilitating the inclusion of workers with disabilities
- Promoting diversity

Actions completed & to come

The Clayens Group has a whistleblowing procedure for all breaches of work ethics, including discrimination based on gender, origin, or disability. This procedure applies to all sites (see the Business Ethics Issues chapter for more information).

Facilitating the inclusion of workers with disabilities

Much more than a commitment, promoting diversity and inclusion is an integral part of our strategic vision for the Group's development. We aim to offer our employees and future employees a fulfilling work environment, where everyone can feel free to be themselves and recognized for their unique qualities. Through the Group Disability Policy, we aim to promote the inclusion of people with disabilities within CLAYENS and its subsidiaries. We believe that diversity and inclusion are the strength of our company and the richness of our teams.

Clayens mentions in its job postings that our jobs are open to everyone, including people with disabilities. Candidates are encouraged to indicate, when applying, if any specific job accommodations are required. This information helps the candidate project themselves into the Clayens environment. As part of the rollout of our HRIS recruitment module, Clayens aims to systematically post its job postings on job sites specializing in the recruitment of workers with disabilities, when these platforms exist in the country concerned.

Awareness-raising actions are carried out on certain sites, particularly within our Clayens Doubs subsidiary, which has been involved in this approach for several years, by participating in the "DuoDays" scheme: pairs between people with disabilities and company employees who volunteer for a day, in order to introduce our company and a profession.

The objective is to be able to deploy this type of action in a greater number of sites.

Clayens' objective is to have a disability representative present in each country where the Group operates by 2026. The disability representative role covers four aspects:

- Being a "trusted third party" whose role is to inform, guide and support employees with disabilities, particularly at certain key moments (starting training, returning after a long period of absence, support for recognition of disabled worker status).
- Be a facilitator, who acts as a link between the various internal and external stakeholders. He organizes the
 consideration of disability throughout the recruitment and integration process (recruitment or reception within
 the framework of internships, provision of materials, etc.)
- Manage actions and projects and build action plans (objectives, indicators and budgets) which can be formalized within the framework of an agreement or convention with an external organization.
- Be an "ambassador" for the employment of people with disabilities. It organizes information and awareness-raising actions (key concepts in the field of disability and employment, available service offers, etc.) aimed at all employees; or actions on targeted functions (management committee, recruiters, managers, support services).

Promoting gender diversity

Clayens began, several years ago, steps to become a more diverse organization, and identified the representation of women in its workforce and their leadership as a major issue in its human resources policy. In France, the Gender Equality Index is calculated annually. Collective agreements on professional equality between women and men have been in place for several years. The Group is working to roll out these best practices across all its entities.

Clayens measures the "unadjusted" pay gap between men and women globally. This was 42% in 2023 compared to 29% in 2024. However, this method of calculation is not truly representative, as our female population is less represented in managerial positions.

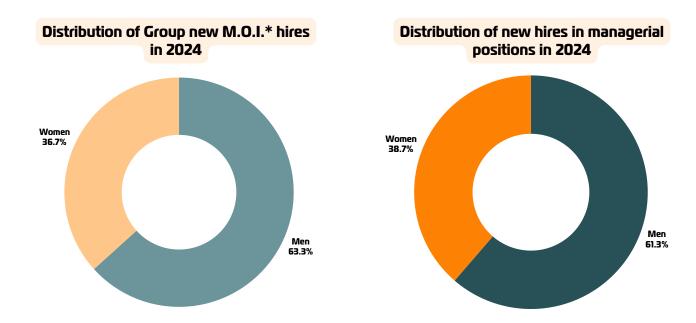
We are working on implementing a more consistent indicator to measure pay gaps between positions.

Although significant progress has been made in the representation of women, particularly in managerial roles, Clayens wants to go further. This is why, beyond the desire to maintain a gender distribution rate as close as possible to 50%/50%, the objective set by the General Management is to reach 30% of women in managerial roles by 2026.

To achieve this goal, Clayens strives to maintain an increasingly inclusive recruitment process, avoiding biases related to the industrial world. For example, in France, our job posting titles and wording must promote neutrality.

In 2023, Clayens implemented a monitoring indicator for the gender of employees recruited. Monitoring this indicator allowed us to have comprehensive data for 2024.

Implementing the recruitment module of our future HRIS will allow us to refine our indicators for 2025, starting with the application process. These more in-depth analyses will allow us to implement targeted action plans, based on countries or sites, and the causes identified.



In 2024, as part of our annual People Review campaign, 27% of our Key Talents* and 33% of our Experts* were women. Our 2025 campaign should allow us to go further in identifying and supporting women, and thus enable us to build ambitious career plans for them.

Communications in the form of "feedback" interviews with women from different sites, positions, and hierarchical levels are conducted each year on International Women's Day. Workshops and ceremonies honoring our female employees are also held within our subsidiaries.

Through its internal newsletter, published in all the group's languages and distributed to all our subsidiaries, Clayens ensures that all initiatives in favor of inclusion and diversity are highlighted, and produces quarterly profiles of members of the Management, striving to promote the career paths of both men and women.

However, Clayens wants to go further by offering inspiring content on the subject, both internally and externally. Beyond acting within its organization, Clayens wants to act more broadly across its sector of activity. For example, a podcast in the form of an interview was produced in 2024 to give a voice to our Vice President in charge of the Procurement function. This was distributed internally and externally via our various networks (LinkedIn, YouTube).

In France, a sexual and sexist harassment representative is designated within each SEC (works Council for Social and Economic Affairs). Each SEC member receives training. The Group also strives to raise awareness among its employees about the concepts of diversity and inclusion.

^{*}see Glossary

The implementation of our future e-learning platform should allow us to significantly extend these actions on a global scale by 2025.

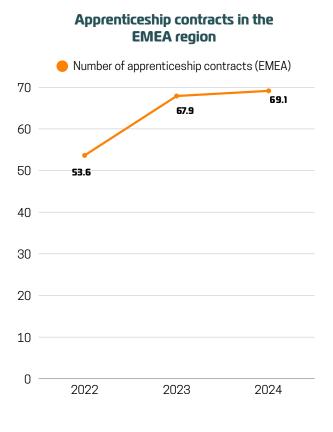
Promoting generational diversity

Clayens aims to promote lifelong career development and the exchange of knowledge for and between all generations in order to stimulate learning and innovation. The mentoring and mentoring systems implemented contribute to this transfer of skills.

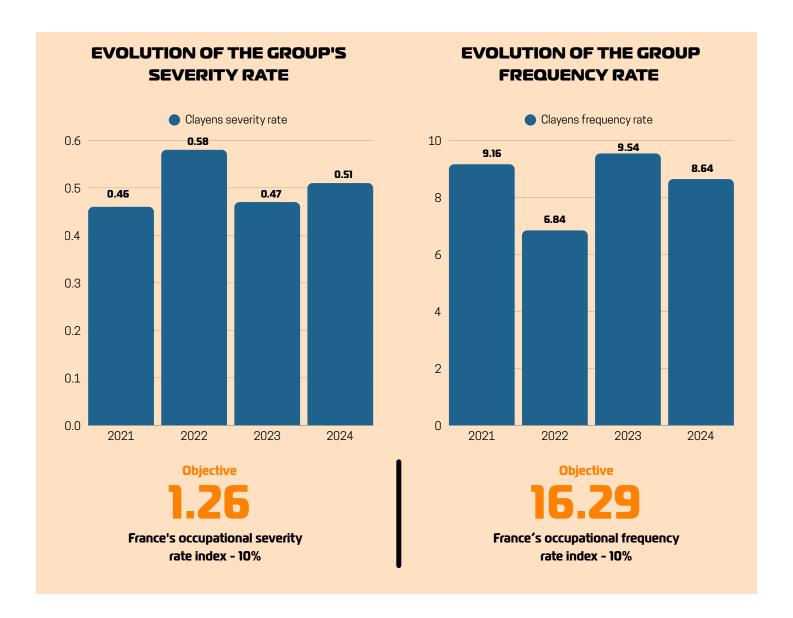
For many years, Clayens has been particularly committed to apprenticeships and has established close ties with training establishments in order to attract young talent.

in 2023 2024 2023 50 43.5 40.4% 40 32.1% 31.1% 28.9% 30 27.9% 20 10 4.3% 3.4% 0 Kauce

% of seniors over 50 years old in our workforce







Policies

A Group occupational health and safety policy has existed since 2019 and is reviewed annually. It was last updated in January 2023. No updates were published in 2024. Indeed, following the implementation of the CSRD, Clayens is working internally to update its policy and is trying to implement it with all the necessary elements to meet the CSRD's expectations. The policy is approved and signed by the Executive Managing Director. It applies to all Group subsidiaries. When working on site, subcontracting companies are trained in the Health and Safety rules to be followed, as outlined in this policy.

Health and Safety Issues:

- Reduce work accidents and occupational illnesses
- Work towards the continuous improvement of working conditions
- Integrate employees into the deployment and implementation of its Health and Safety policy

Actions completed & to come

Comply with health and safety regulations at work

The Group's objective is to structure itself in such a way as to anticipate the various regulatory developments and be proactive on the subject. Monitoring is carried out to anticipate, as far in advance as possible, new legislative texts that could apply to its various subsidiaries. The French sites have monitoring software for tracking OHS issues. For subsidiaries outside France, monitoring is carried out either by local monitoring software or by internal monitoring, via the government websites of each country.

Quarterly EHS clubs are organized with all EHS managers from EMEA subsidiaries. The aim of these meetings is to share best practices in terms of occupational health and safety. They provide a time for direct exchange between the HSE management and the HSE representatives of the sites, on topics related to health and safety, performance indicators, as well as operational feedback.

Reduce work accidents and occupational illnesses

The Clayens Group aims to enable all its employees and external contractors to work in a secure environment and with good working conditions.

In order to prevent as early as possible the risks to which its employees may be exposed, Clayens deploys Professional Risk Assessments revised as often as necessary on its EMEA sites, which corresponds to 100% of the sites in the EMEA perimeter.

A project to deploy a digital solution to carry out risk analyses is currently being validated for launch in early 2025.

Each Group employee is informed of the risks of their job and the rules to follow via the work instructions for their position. These are written in the local language of the country where the site is located. Since the end of 2024, the first e-learning modules, specific to business risks, have been distributed to all French-speaking sites. Translation into the local languages of our sites is underway and will be finalized during 2025. A second wave of e-learning, supplementing business risks, will be distributed during 2025 in the various languages.

Every employee undergoes a periodic medical examination in accordance with current regulations. Employees subject to enhanced monitoring undergo more regular checkups depending on the risks associated with their working conditions, such as exposure to electrical hazards or night work.

In order to guarantee optimal working conditions for its employees, each site is required to provide and maintain Personal Protective Equipment (PPE) or Collective Protective Equipment (CPE) in good condition.

In order to best adapt each PPE/EPC to the exposure situation and to inform employees of the risks involved, safety data sheets are in place at each workstation. Each sheet contains information on the training to be carried out in the face of identified risks, such as noise awareness training or the ergonomics of a screen workstation.

Work towards the continuous improvement of working conditions

The Clayens Genas site has been ISO 45001 certified since 2021 (previously OHSAS 18001). This certification allows the Group to continually improve its Health and Safety management system thanks to feedback from audits of this site.

In order to position the Clayens work environment among the safest in the sector, the group analyses and handles 100% of accidents.

The goal of this analysis is to take concrete, cross-functional action across all of its sites, with a view to achieving "zero accidents." Risk analyses are conducted when a new process or work procedure is modified or implemented. These analyses are carried out from the start of the project in order to implement new prevention rules, if necessary.

The Group also conducts ergonomic workstation studies to detect and anticipate future occupational illnesses that its employees may face. More ergonomic workstations are being designed based on these analyses and the issues identified. A simplified MSD detection module is currently being developed.

It will allow adaptability across all subsidiaries, but also to be able to carry out a greater number of risk screenings per year.

To check whether all the preventive measures that have been put in place are effective and remain in force over time, the Health and Safety managers of the sites regularly carry out workshop tours using checklists.

The aim is to verify the presence and condition of technical, human and organizational prevention measures, as well as the absence of risks in the employees' working environment.

Similarly, work equipment is inspected regularly, either according to regulations in force relating to the equipment, or according to good practices defined internally.

The Group is also continuing its efforts to standardize its approach to risk by implementing the "Golden Health and Safety Rules" across the entire Group by 2024.

Always with a view to protecting its employees, the Group ensures that all sites with a Social and Economic Committee have at least one sexual and sexist harassment representative.

The names and roles of these individuals are communicated to each employee so that, if necessary, they can contact individuals who can receive their testimony. They are trained on the appropriate follow-up actions in such cases. These individuals are also present in the event of a dispute to ensure the protection of victims, whistleblowers, and witnesses regarding these harassment issues.

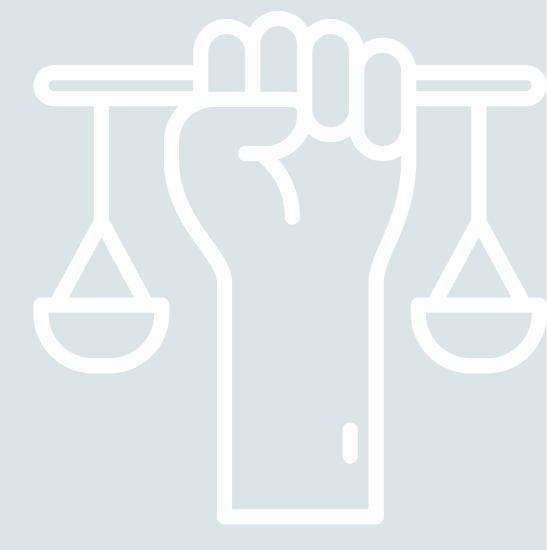
Integrate employees into the deployment and implementation of the Health and Safety policy

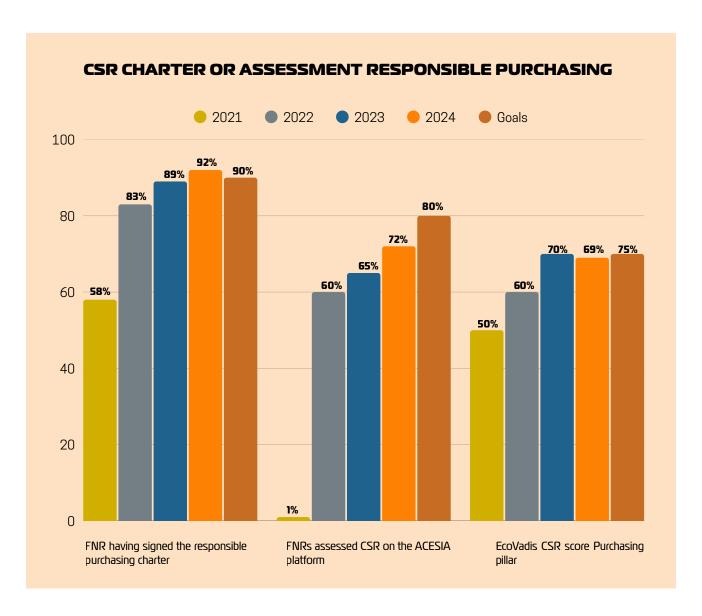
In order to improve safety culture, each new arrival receives awareness/training according to the defined needs, in relation to the risks related to their position. This initial training is reinforced and renewed over the years, in view of the needs and reassessments of the risk levels per position.

In 2022, and still with the aim of raising maximum awareness among employees about safety, 100% of French sites organized external training on the roles and responsibilities of managers in Health and Safety.

Employees are encouraged to contribute to improving working conditions through "Improvement Suggestions," which include a health and safety component. They also participate in occupational risk assessments to ensure that these are as closely aligned as possible with their working conditions.

HUMAN RIGHTS AND WORKERS' RIGHTS IN THE VALUE CHAIN





>>> Clayens is committed to achieving a score of 75% for the Responsible Purchasing pillar of the Ecovadis questionnaire by 2027.

HUMAN RIGHTS AND WORKERS' RIGHTS IN THE VALUE CHAIN

Policies

A Responsible Purchasing Charter for Sustainable Development has existed since 2014 and is reviewed annually. No updates have been published in 2024. Indeed, following the implementation of the CSRD, Clayens is working internally to update its policy and is trying to implement it with all the necessary elements to meet the CSRD's expectations. It is signed by the Executive Managing Director. It applies to all of the Group's buyers as well as to the Group's suppliers and subcontractors.

Human Rights & Workers' Rights Issues in the Value Chain:

- Guarantee respect for human and labor rights among suppliers and subcontractors present in the upstream and downstream value chain
- Ensuring the safety of subcontractor and value chain workers

Actions completed & to come

Guarantee respect for human and labor rights among suppliers and subcontractors present in the upstream and downstream value chain

A responsible purchasing policy has been in place since 2021. In addition to this policy and in line with the objectives set out therein, a "Responsible Purchasing Charter for Sustainable Development" is publicly available on the Group's website. In 2022 and 2023, the Group has decided to offer a new version of this charter to its suppliers (first charter published in 2021).

This Supplier Charter strengthens the link between Clayens' expectations of its suppliers, its code of conduct, and its new CSR objectives for purchasing. This charter, which must be signed, commits suppliers and subcontractors to unreservedly adhering to the following principles:

- Prohibition of child labor: They must not employ persons under the legal minimum age, nor support child labor, except as part of an official youth training program approved by the government.
- The elimination of forced and compulsory labour (ILO fundamental conventions)
- Compliance with all applicable laws on remuneration, benefits and working hours (fundamental ILO conventions)
- Respect for freedom of association and the right to collective bargaining
- Elimination of discrimination at work
- Respect for the right to development
- Respect for Health and Safety at Work
- An explicit and affirmed environmental commitment

HUMAN RIGHTS AND WORKERS' RIGHTS IN THE VALUE CHAIN

By signing this charter, the stakeholders in the Clayens value chain undertake not to be complicit in human rights violations and to combat all forms of modern slavery. In this regard, it is their responsibility to ensure that systems are in place to guarantee proper compliance with labour standards on their sites and, where applicable, on those of their own suppliers.

If the supplier fails to sign, it is identified as a risk to the Group. This charter also includes a penalty for non-compliance in the "Commitment to Compliance - Breaches" section. In the event of non-compliance with the CSR principles cited in the responsible purchasing clause, the CLAYENS group reserves the right to terminate the contractual relationship with its suppliers.

Clayens tracks its strategic suppliers' commitment to its Responsible Purchasing Charter for Sustainable Development, and has a target set as a percentage of its signature. Each employee receives and commits to respecting the Clayens Code of Ethics. The Group's executives, department heads, and buyers must also sign it. This contains a section relating to the rules to be respected with business partners, including suppliers and subcontractors, and sets out the following rule: "Clayens requires its suppliers and subcontractors to strictly comply with all legal provisions relating to their activities and their professional environment. The Group asks its suppliers and subcontractors to sign its Responsible Purchasing Charter for Sustainable Development, which requires respect for human rights, employee health and safety, ethical rules – particularly in the area of prevention against corruption and competition law –, environmental protection, as well as compliance with applicable laws and regulations. Clayens implements systems to ensure compliance with these commitments, during the selection and execution of contracts."

This is why CSR criteria are taken into account when selecting suppliers during calls for tender. Suppliers identified as being at risk are reviewed quarterly by a Responsible Purchasing Committee to decide on the actions to be taken: reminders to sign the Clayens responsible purchasing charter, risk analysis, the possibility of terminating the relationship or launching an action plan.

Ensuring the safety and inclusion of subcontractor and value chain workers

Clayens is committed in its Group health and safety at work policy, which applies to all of its subsidiaries, to ensuring the safety of external companies that work directly within its subsidiaries, either permanently (for example: cleaning companies for the premises present during the day and on all working days of the sites), or on an ad hoc basis (for example: companies providing repairs or maintenance of production equipment).

HUMAN RIGHTS AND WORKERS' RIGHTS IN THE VALUE CHAIN

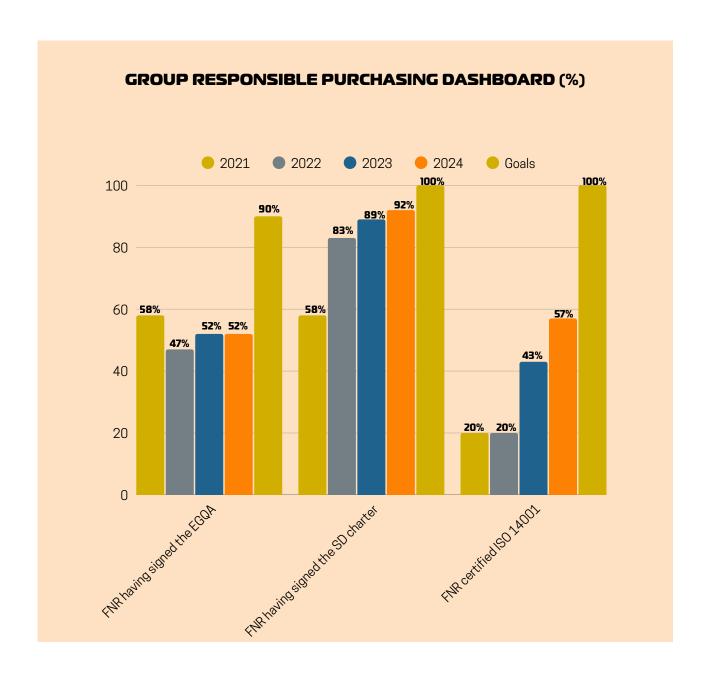
To this end, each job carried out by these external companies is governed by a prevention plan drawn up between the various stakeholders, even in countries where regulations do not require it. The aim is to train external companies on the risks encountered within the Group's factories, but also to communicate to them the rules and best practices that they must follow in terms of health, safety and the environment.

Clayens encourages inclusion among its subcontractors. The responsible purchasing charter includes criteria for diversity, equity, and equal opportunity. Indeed, in its responsible purchasing policy, the Group is committed to taking into account diversity and inclusion criteria, such as the employment of employees with disabilities, through Work Assistance Establishments and Services (WAES) or Adapted Enterprises (AE) (see Responsible Purchasing).



RESPONSIBLE PROCUREMENT





RESPONSIBLE PURCHASING

Policies

A Responsible Purchasing policy has existed since 2021 and is reviewed annually. It was last updated in March 2023. No updates were published in 2024. Indeed, following the implementation of the CSRD, Clayens is working internally to update its policy and is trying to implement it with all the necessary elements to meet the CSRD's expectations. It is signed by the Executive Managing Director. It applies to all of the Group's buyers.

Responsible Purchasing Challenges:

- Control the supply chain by selecting suppliers in an ethical and responsible purchasing approach
- Monitor the CSR performance of our buyers and suppliers
- Develop a lasting and quality relationship with our suppliers
- Increasing awareness of CSR issues among employees and suppliers

Actions completed & to come

Control the supply chain by selecting suppliers in an ethical and responsible purchasing approach

A responsible purchasing policy has been in place since 2021. In addition to this policy, and in line with the objectives set out therein, a "Responsible Purchasing Charter for Sustainable Development" is publicly available on the Group's website. It is systematically sent to suppliers for signature. In the event of non-compliance, the supplier is identified as being at risk for the Group. This charter also includes a penalty in the event of non-compliance in the paragraph "Commitment to Compliance - Breaches". In the event of non-compliance with the CSR principles mentioned in the charter, the CLAYENS group reserves the right to terminate the contractual relationship with its suppliers.

The Group is committed to being exemplary in terms of loyalty regarding integrity practices and fair treatment of its suppliers and partners with clear and factual selection criteria, including CSR criteria. Suppliers, aiming to control their carbon footprint and having logistics strategies limiting their environmental impacts, are favored through this rating.

In addition to this system, Clayens has integrated into its offer comparison system a "responsible purchasing" criterion including current or completed ISO 14001 certification and the signing of the Group's Responsible Purchasing Charter.

The Group's policy also sets a target of 20 suppliers from the sheltered sector (ESAT, AE, or the presence of companies run by women) on the panel. For the 2023 financial year, the Group has 27.

RESPONSIBLE PURCHASING

Clayens is committed to promoting diversity among its suppliers. This includes taking into account inclusion criteria, such as the employment of employees with disabilities.

Monitor the CSR performance of buyers and suppliers

The Group implements the necessary means to evaluate the CSR performance of its strategic suppliers via AFNOR's ACESIA self-assessment module. This measurement tool assesses a supplier's social and environmental risk, based on three themes: "Vision and Governance", "Human Resources and Social Aspects", and "Environment". The Group's CSR assessment campaign was extended to suppliers considered at risk (Purchasing Stamping, Packaging, Painting), according to the AFNOR Purchasing category assessment, in 2023.

At the end of the self-assessment, the supplier has access to a summary of their responses, along with recommendations to help them improve their score. This supplier assessment helps identify potential suppliers that pose a risk to the Group and risky purchasing categories, as well as raise awareness among suppliers who have not yet initiated a CSR approach about the aspects that need to be taken into account when structuring their strategy.

By the end of 2023, 64.8% of strategic suppliers had been assessed through this platform, or had been monitored by an external organization in terms of CSR. This assessment, in collaboration with ACESIA, is supplemented by on-site supplier audits.

A summary of all the assessments and the progress of the objectives, linked to responsible and ethical purchasing, is distributed biannually by the Purchasing Department, to the General Management, and the Regional and Sector Directorates.

Since 2023, Clayens has been planning to integrate responsible purchasing criteria into the evaluation of individual buyer performance, and by 2025, this will enable employees to become increasingly involved in their social responsibility. Similarly, internal controls and actions to reduce purchases outside of Clayens' standard processes are currently being developed.

The Group ensures compliance with supplier payment terms and conditions, with a focus on French VSEs and SMEs, which are most susceptible to excessively long payment terms (>60 days). Clayens also ensures compliance with the LME law: Economic Modernization Law. The LME law protects SMEs and combats the excesses of power of major contractors.

Beyond this particular focus, the Group monitors payment terms in countries outside France and Europe. The 2023 report notes only five payment terms exceeding 90 days. Clayens also supports 100% of its suppliers who request assistance with financial difficulties.

RESPONSIBLE PURCHASING

Develop a lasting and quality relationship with suppliers

To achieve a delivery service rate in line with the set target of 95%, the Group supports its suppliers experiencing difficulties with compliant deliveries, whether in terms of deadlines, quality or quantity. This monitoring of the upstream part of its supply chain allows the Group to anticipate and address potential problems that could subsequently impact its entire value chain. Thus, Clayens remains attentive to its suppliers' supply difficulties and implements operational solutions to support their production capacity and the management of logistics crisis situations. Periodic monitoring by supplier scorecard includes a discussion on possible support solutions to be implemented. These constant exchanges with its suppliers allow Clayens to maintain a lasting relationship of trust with them.

Increasing awareness of CSR issues among employees and suppliers

Clayens is developing the knowledge of its employees and suppliers in responsible purchasing. By 2023, 75% of the Group's buyers had completed responsible purchasing training.

At the same time, 60% of strategic suppliers have been made aware of the CSR-Clayens module. Clayens also plans to raise awareness among its strategic suppliers about ISO 14001, ISO 50001, and ISO 9001.

To improve its performance, Clayens aims to raise awareness and train its Group purchasing department, as well as subsidiary buyers, annually on ethics and CSR issues.

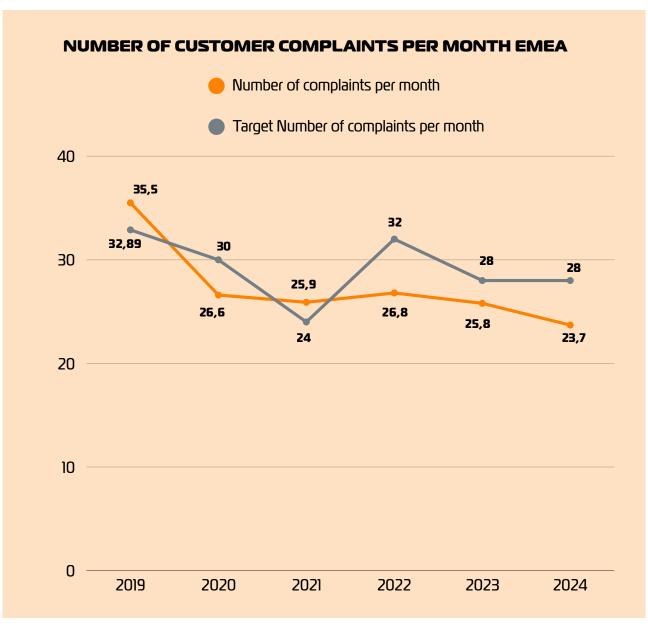
This is why the Group is planning several target training courses from 2023:

- Anti-corruption training for all subsidiary buyers, before the end of 2025. (28% have already been trained in 2023);
- Monthly awareness-raising on CSR risks by purchasing category, currently being deployed;
- Training on LME and country-specific payment terms for all Group buyers, whether based at headquarters or in subsidiaries.

Other supplier awareness and support projects are planned. Awareness-raising on the responsible sourcing of conflict minerals and support for strategic suppliers not registered on the ACESIA platform have been underway since 2024. Supplier awareness-raising will also focus on carbon footprint measurement. With Clayens' greenhouse gas emission reduction strategy having been certified by the SBTi, the Group is also encouraging its raw material suppliers to measure and provide it with their own GHG footprint assessments.

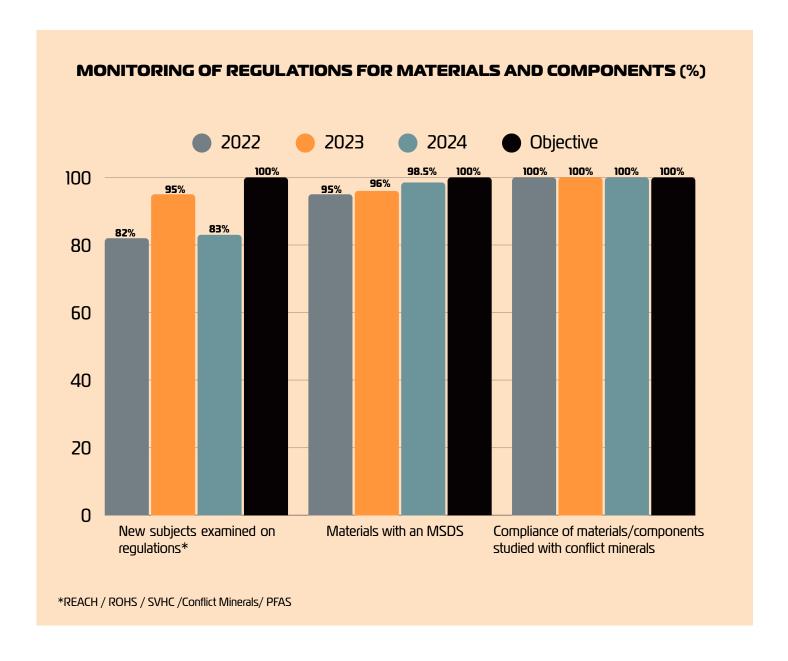
The goal of this commitment is, initially, to collect available data from suppliers who have already worked on the subject. This will allow us to continuously improve the accuracy of Clayens' Scope 3 measurement, but also for suppliers who have not yet taken this criterion into account to begin engaging on the subject, and to put in place the necessary means to decarbonize their processes.





>>> At the end of 2024, the Group's PPM rate compared to 2023 has decreased by 8.1%.

The year 2024 saw a decrease in customer complaints despite a change in scope with the acquisition of sites and intersite transfers of numerous products following the merger of NP Piacezno and NP Polska.



Policies

A Group environmental policy, reviewed annually, has existed since 2019. Its last update was in December 2023. In 2024, no update was published. Indeed, following the implementation of the CSRD, Clayens is working internally to update its policy, and is trying to implement it with all the necessary elements to meet the expectations of the CSRD. The policy is approved and signed by the Chairman and CEO. It is communicated internally, and applies to all Clayens sites. It has a focus on the Health and Safety of finished products to ensure the prevention of the health and safety of the end consumers of our products.

A management statement exists and is reviewed annually. It was last updated in January 2024. It includes quality issues and the continuous improvement of customer satisfaction.

Actions completed & to come

Ensure the prevention of the health of the end consumers of our products

Requirements, particularly those relating to the use of chemical substances, can impact the environment as well as the health of consumers and Group employees: REACH Regulation, RoHS Directive, End-of-Life Vehicles (ELV) Directive, Conflict Minerals, PFAS, etc.

The Clayens Group has a Regulatory Compliance Department for Finished Products, whose mission is to ensure that finished products delivered to the Group's customers comply with various regulatory and customer requirements. The team that manages this department acts as the direct interface with customers to respond to and provide the necessary elements for their requests for proof of compliance with their requirements.

This department is also responsible for ensuring that conflict minerals are not used in the Group's various production lines. The Group relies on the Conflict Minerals Reporting Template (CMRT) that it sends to the relevant suppliers, and reviews the response received from them to determine whether the item is compliant. This issue is taken into account from the project phase. When registering a new material on the panel, the

Group's buyers systematically ask the supplier to provide them with the material's MSDS, its REACH compliance certificate, its RoHS compliance certificate, and its compliance with conflict minerals regulations. As specified in the Responsible Purchasing policy, as well as in Clayens' EGQA, the supplier must provide the Group with any response concerning the origin of tantalum, tin, tungsten, gold, as well as other minerals contained in the products they supply. They must ensure that the import of these minerals and metals comes exclusively from responsible sources, and that they do not come from conflict zones.

By the end of 2024, information on conflict minerals is available for 100% of the suppliers surveyed. Of all the certifications received and reviewed, 0% of the Group's materials or components contain conflict minerals.

The origin of the metals in the Group's components comes from recycling or scrap metal dealers.

Clayens also ensures compliance with the requirements on raw materials and components imposed by customer specifications (IMDS Declaration, Specific Trade Directives, etc.).

When a project reaches the pre-production phase, the client in question sends Clayens a list of their substance restriction requirements based on existing environmental and safety regulations and directives. These requirements are reviewed jointly by the Compliance Department and the Group Quality Department to determine the conformity of the finished product. This verification is then updated following receipt of a formalized request from a client throughout the product's production life.

A monitoring indicator was put in place in July 2024.

The Compliance division also ensures the monitoring of updates to MSDSs and regulatory certificates for the Group's raw materials, chemical products and components.

In 2024, the Group recruited an additional person to expand its product compliance department. The goal is to eventually be able to respond to 100% of requests received from its customers for parts delivered by the Group over a given period.

To date, there has never been a need to resort to the Clayens product recall procedure.

Ensure the prevention of the safety of our employees and the end consumers of our products

A chemical risk assessment is systematic for French sites.

It monitors the exposure of Clayens employees to risks related to the use of raw materials, components, and chemical products. All products are assessed using an INRS tool.

This assessment is updated as new products are integrated into the sites.

Before introducing a new product or material on site, the MSDS and a safety opinion request (an internal Group document) are sent to the Group HSE department for the product's health and safety risk assessment. If the product or material is categorized as hazardous, the first action taken is to seek a substitute in agreement with the customer, if necessary.

For non-French sites in the EMEA zone, subsidiaries rely at least on the product's SDS as well as on the regulations in force in their country to assess the risk and put in place the necessary protective equipment.

To complement the specific actions taken in various departments, all employees are trained in the handling and storage of chemicals. Chemical risk assessment will be rolled out across all EMEA sites starting in 2025.

Clayens produces plastic parts, some of which are subject to safety restrictions related to the use of the final product. This is particularly the case for so-called "SR" parts - Safety / Regulations - which concern the automotive sector.

The monitoring of these parts is integrated into a dedicated process governed by a specific work instruction.

This process includes:

- Identification of parts by a logo representing an inverted triangle in a circle,
- Notification of these parts and their special characteristics in site monitoring plans
- Carrying out annual internal product audits
- Raising awareness among the personnel concerned about the risks associated with SR parts, via support available on the Group's intranet, which is supplemented by internal support at the sites concerned.

A specific PSRC qualification will be provided to all Quality Managers at EMEA sites in 2024.

In the medical sector, the parts concerned are subject to specific information procedures with the health authorities.

These are based on Materiovigilance. Through these procedures, Clayens alerts health authorities in the event of non-compliance with its raw materials, which could pose a health risk.

The site quality managers are responsible for reporting information. To date, Clayens has never needed to use these procedures.

An escalation process, called "Red Alert," is in place in the event of a security crisis or other major event involving risks for staff and/or customers. This is handled via our Fabriq industrial management software, which is then passed on to the Group's functions, including General, Regional, and Sector Management. Regardless of the business sector, the site's Quality Managers are the representatives for the safety of finished products. Risk Management Plans, as well as FMEAs, are established from the design phase to assess the potential risks associated with these products.

The aim of risk assessments is to anticipate potential problems as early as possible and identify areas of vigilance that need to be implemented on manufactured parts. To date, there have been no legal proceedings related to product safety.

The Group carries out annual tests, planned for certain products when necessary, or required by the customer (stress resistance test, tear test, electrical insulation test, etc.). External qualifications on the management of safe automotive products, called PSCR (Product Safety and Conformity Representative), or aeronautical products, called SMS (Safety Management System) have been carried out for all Quality managers of sites working for the automotive and aeronautical sectors. The principles have been integrated into the Group's general quality system.

Product quality management

Clayens is certified, through its subsidiaries, on 6 different quality standards. The Group's sites are at least certified on the specific standard of its own sector(s) of activity: IATF 16 949 for the automotive industry, ISO 13 485 and/or ISO 15 378 for the medical industry, EN 9 100 for the aeronautics industry, AQAP 2 110 for the defense industry.

In addition to these certifications, some sites are certified to the ISO 9001 core standard, representing 82% of the Group. Each site is autonomous in managing the quality of its products, while integrating into the Group's standards.

Customer satisfaction performance indicators are managed by each of the Group's entities, and a progress plan, linked to the pursuit of defined objectives, is established annually.

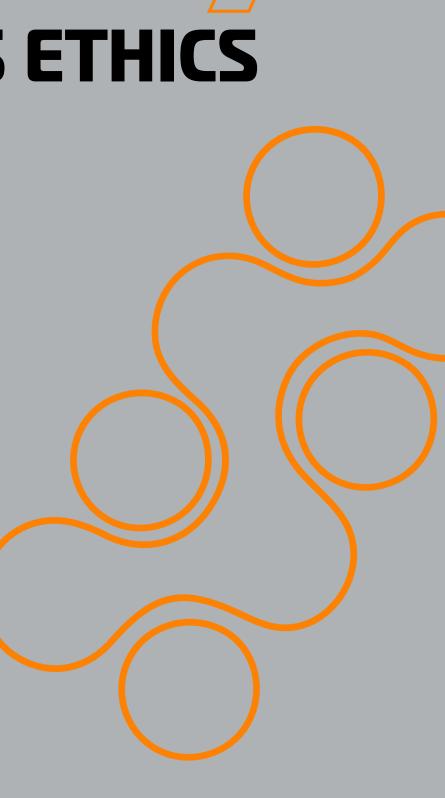
The Group's subsidiaries carry out an annual Management Review to establish a performance assessment associated with their processes, and thus measure the progress of their action plans and their effectiveness.

Management Letters (process reviews) are established monthly on all sites and for each process, in order to ensure effective management throughout the year.

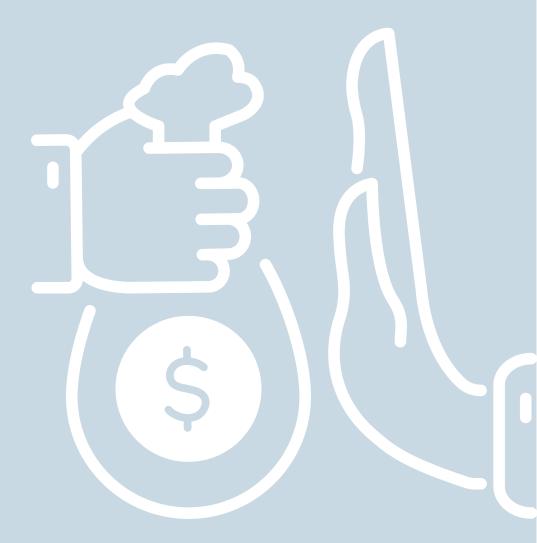
These monthly reports, integrated into specific group software (FabriQ), and implemented in 2024 across all EMEA sites, enable real-time consolidation of key operational and financial indicators, and thus overall performance management at the level of the Executive Committee and central management.

The year 2025 will be focused on the development of Management Control, integrated into a global system called CES (Clayens Excellence System), aiming to establish a unique model of operational management of sites, via daily Plant Tours and Top 5s, which, combined with the reporting specified above, will allow a harmonization of working methods and a benchmark reference system.

BUSINESS ETHICS ISSUE



CORRUPTION & ANTI-MONEY LAUNDERING



CORRUPTION & ANTI-MONEY LAUNDERING

KEY PERFORMANCE FIGURES

- >>> 100% of executives and department heads sign the Code of Ethics worldwide.
- >>> 100% of buyers at Group level (excluding 2023 site acquisitions) are trained in anti-corruption.

Policies

A Code of Ethics exists and is reviewed annually. The last update was in March 2023. A new update is planned for early 2025. Indeed, following the implementation of the CSRD, Clayens is working internally to update its policy and is trying to implement it with all the necessary elements to meet the CSRD's expectations.

The Code of Ethics is approved, and signed by the Executive Director. It is communicated internally, and applies to all Clayens sites. It is available on the Clayens website in all of the Group's spoken languages and on the company's intranet.

Corruption & Anti-Money Laundering Issues:

- Train and raise awareness of ethics and anti-corruption among exposed employees
- · Assess and prevent the risk of corruption and breach of ethics

Actions completed & to come

Train and raise awareness among employees exposed to ethics and anti-corruption

The internal regulations of the Group's various subsidiaries all include an article on work ethics linked to the Group's code of ethics.

To ensure that every employee is aware of Clayens' ethical requirements, the Group Code of Ethics and the internal regulations for the plant concerned are distributed to all employees upon their arrival. Upon hiring, managers, department heads, and buyers sign the code of ethics. The latest version was updated in 2023 with an addition regarding sensitive transactions and the gift policy. This new version was sent to all employees and provided in paper form to workers with their pay slips. At the same time, simplified communications of the code of ethics are posted on the sites and communicated to employees.

In addition to this document, in France, two-hour classroom training sessions on anti-corruption were provided to 100% of senior executives and staff identified as being at risk by a law firm.

CORRUPTION & ANTI-MONEY LAUNDERING

To determine which employees are at risk, within the scope of Clayens' specific actions, a corruption risk map was established in 2024, in collaboration with the external firm that also provided the anti-corruption training. The map is updated annually by the Group Quality Department, and jointly with the Compliance department.

Clayens' sales teams are also trained on how to set fair and ethical prices. There are no price adjustments beyond market logic, nor are there any price agreements between the sales departments of Clayens's competing companies.

No gratuities are permitted in the event of a contract award. The Code of Ethics is planned to be updated in 2025 to make it more accessible and consistent with the new risk mapping carried out at the end of 2024.

Similarly, in a spirit of transversalization, and to ensure understanding of each of the concepts and issues related to anti-corruption and ethics, an e-learning training module is currently being deployed. In April 2024, awareness training was organized by an external firm as part of the annual meeting of the Executive Committee, for all subsidiary directors, as well as for several managers at group level.

A travel and travel expenses policy has existed since 2021. A new version was drafted in 2023. This policy is provided and explained to each person whose role requires regular business travel.

It is also given to anyone who has to travel as part of a mission or training outside the site to which they are attached.

This policy defines the rules to be followed during business travel, including advance and reimbursement of expenses, and the definition of acceptable and unacceptable gifts and hospitality. Regarding expense validation, a dual-signature procedure between the employee and line manager is in place. Expenses are then verified by the accounting department.

Assess and prevent the risk of corruption and breach of ethics

The Group complies with the tax regulations of the countries in which it operates and fulfills its tax reporting obligations within the required timeframes. Clayens does not use any complex financial arrangements aimed at obtaining a tax advantage, and does not have any subsidiaries in countries included in the European Union's "list of non-cooperative tax jurisdictions."

To date, there have been no legal proceedings related to corruption or anti-competitive behavior regulations against Clayens. Annual CSR audits, including business ethics, are conducted by several Group stakeholders, including certain shareholders, across the entire Clayens Group.

CORRUPTION & ANTI-MONEY LAUNDERING

Following these audits, reports are produced assessing the Group's CSR maturity level and identifying areas for improvement to continually improve its score.

The Purchasing Quality department also monitors two indicators on suppliers located in red or black zones, according to the Corruption Perception Index (CPI).

The CPI is an indicator compiled by the global organization Transparency International. This index focuses on corruption in the public sector, and defines corruption as the abuse of public office for personal gain. The surveys used to compile the CPI ask questions related to the abuse of official power for personal gain (e.g., bribery of public officials, bribery in public procurement, embezzlement of public funds), or questions that probe the strength of anti-corruption policies, thus including administrative and political corruption.

This organization assigns a score from 0 to 100, from highly corrupt to mildly corrupt, and offers a graphic representation of countries in four color categories, ranging from black to yellow. The black zone corresponds to a score between 0 and 9, and the red zone is between 10 and 39.

Clayens has two objectives regarding the management of its strategic suppliers in relation to the IPC index:

- Less than 1% of its strategic suppliers must be in a red zone, according to the CPI
- None of its strategic suppliers should be located in a black zone, according to the CPI

As detailed in the HR section "Workers' Rights", the Group has implemented an alert procedure allowing any information to be reported on possible abuses of fraud, corruption and money laundering.

This alert procedure will be updated from the first quarter of 2025. Indeed, at the end of 2024, the Group contracted with an external organization to set up a platform accessible to all employees respecting anonymity and data processing.

LOYALTY OF PRACTICES



LOYALTY OF PRACTICES

Policies

A Code of Ethics exists and is reviewed annually. The last update was in March 2023, and a revision is planned for the end of 2025, as previously mentioned. It is signed by the Executive Managing Director. It is communicated internally and applies to all Clayens sites. It is available on the Clayens website in all of the Group's spoken languages, and on the company's intranet.

Actions completed & to come

Agreements and understandings with competitors

Competition law (or "antitrust" laws) guarantees open and fair competition between businesses. Open and fair competition is in the direct interest of Clayens, as well as that of its customers, consumers, and society as a whole. These laws must be scrupulously respected. Companies and individuals who violate these laws are subject to civil and criminal penalties.

The Group has had a code of ethics since 2014, which is regularly updated in line with changes in regulations, and best practices to be adopted.

This document is provided to all newly hired employees. It is accessible to everyone internally on the intranet and externally on the Clayens website. This code sets out several commitments that all Group employees must respect:

- No Clayens employee shall enter into agreements with competitors with the intention or result of fixing
 prices, distorting a tendering process, sharing a market, limiting production, or boycotting a customer or
 supplier.
- Group employees are prohibited from exchanging sensitive information with competitors, as this constitutes
 a violation of competition law.
- Clayens employees must avoid any situation that creates, or could create, a conflict between their personal
 interests (or those of their family members) and those of the Group. To protect employees and Clayens from
 a real or apparent conflict of interest, employees must not hold interests or investments in the company of a
 Clayens supplier, customer, competitor or consultant, or in a partner company, if these interests or
 investments are likely to influence the business decisions taken on behalf of Clayens.
- An employee must not deal directly with a business partner customer, supplier, agent, consultant or any other third party if he or she or a member of his or her family holds an interest in these companies.

If this occurs, the employee must inform the manager of his unit of the situation in a transparent manner, and an arbitration will take place to determine whether the file should be reassigned to another person.

LOYALTY OF PRACTICES

No employee should accept outside work offered by a supplier, client, or competitor, nor undertake any
outside assignment that could adversely affect their performance or judgment in the performance of their
duties at Clayens. Employees must inform their manager of any outside employment.

Respect for competition is also present within the Purchasing Quality requirements, and in the Responsible Purchasing Charter which are transmitted to the Group's suppliers and subcontractors; and which must be signed by them.

The Group Purchasing Quality department establishes a risk map every six months by purchasing category, according to 3 possible CSR impact categories: fair practices, the environment, human rights and social conditions. After rating from 1 to 4 (4 being the highest risk level) on these 3 criteria, each category obtains a gross risk score: risk on the category depending on Clayens activity if no action is taken by the Group. This score is then reassessed to obtain the net risk: residual risk taking into account the control measures taken by Clayens (for example: establishment of requirements on working conditions, implementation of specific specifications with conditions on CSR). The objective is to reduce the net risk score after action to a score below 50, which is the trigger threshold used by Clayens.

An update of the Responsible Purchasing Charter is planned for the first half of 2025, in order to strengthen our suppliers' commitments regarding their practices.

Clayens requires its suppliers and subcontractors to strictly comply with all legal provisions relating to their activities and professional environment. The Group implements systems to ensure compliance with these commitments during the selection and execution of contracts. As detailed in the HR section "Worker Rights," the Group has implemented an alert procedure to allow for any information to be reported on potential abuses of fraud, corruption, and money laundering.

The creation of a "Compliance" division in 2023 was born within the Group. This independent division, reporting directly to the General Management of Clayens, is responsible for identifying risks related to regulatory compliance, particularly on issues related to ethics, free competition, and anti-corruption; and for proposing an action program enabling the Group to strengthen its position on these themes.

In line with its compliance approach and in the desire to strengthen its practices, a compliance committee will be set up from the first quarter of 2025. This will be made up of a project manager and three project leaders (HR, legal, internal control).

SECURITY & CONFIDENTIALITY OF INFORMATION



SECURITY & CONFIDENTIALITY OF INFORMATION

KEY PERFORMANCE FIGURES

- >>> In 2024, 7 phishing test campaigns were carried out.
- >>> 100% of people who failed a first internal phishing campaign were reintegrated into a second campaign.
- >>> A compromised employee is a person who has provided personal data such as their email address on the test support of the phishing campaign carried out by the IT team.

Policies

A Group IT Systems Security Policy has been in place since January 2022 and is reviewed annually. The most recent update was in December 2023. It is signed by the Executive Managing Director, the CIO, and the CISO. It is communicated internally and applies to all Clayens sites.

Security & Confidentiality of information issue:

- Raise awareness and train users of IT services within the Group
- Ensure compliance with data protection

Actions completed & to come

Train and raise awareness among users about IT services

At Clayens, each new hire whose position requires the use of any computer system is made aware of IT security during their induction process. Awareness needs are identified before the employee's actual arrival on site via an internal Group document. This document lists both the employee's IT equipment requirements, and the various access rights to be granted.

Upon arrival, the Group's IT Charter is communicated to them via a welcome booklet. This is followed by a training period with the module on the subject of IT security. Within this cybersecurity training, the various threats that a user may encounter (phishing, account breaches, data hacking while roaming in particular) are presented.

An explanation on the detection of these threats, a list of tips, and best practices are provided. The module aims to provide the key points to adopt for good behavior guaranteeing the security of the data held or processed.

To assess the effectiveness of the training provided, tests are carried out internally by the Group's IT department using internal phishing files.

SECURITY & CONFIDENTIALITY OF INFORMATION

The results of these tests are communicated to the various sites, along with comments reminding them of the correct actions to take in the event of such an attack. People who fail these tests are automatically added to the list of people to be retested during subsequent campaigns. The last test, conducted in December 2024, achieved a success rate of 93.9%.

In 2024, we launched awareness-raising activities on GDPR and cybersecurity through e-learning. These digital training courses aim to increase the number of training sessions conducted each year, and thus achieve the set objective of training 100% of those involved in IT security.

Ensure compliance with data protection

A dedicated unit within the Group IT department, composed of two people, is responsible for ensuring the continuous improvement of cybersecurity. This data protection system aims to prevent external attacks in advance, as well as internal failures that could, for example, originate from Group users. Only hardware or software that has been authorized by the IT department may be installed on each employee's machines.

Tasks performed on the user's machine are continuously recorded to detect, and alert users of potential security risks. Web access is filtered by user category based on their status to comply with the Group's legal and security requirements.

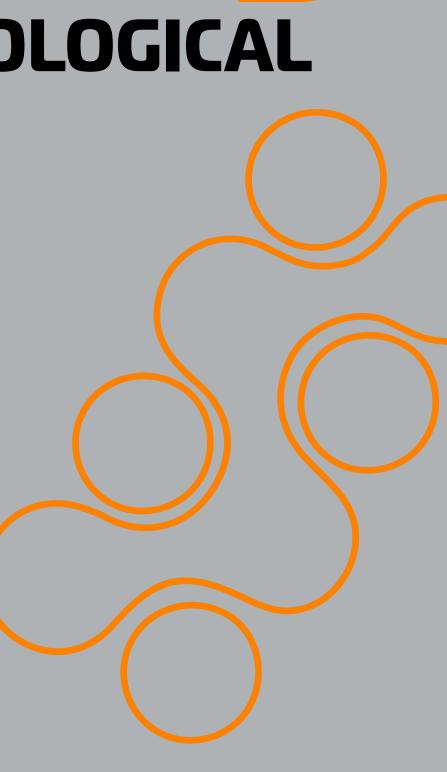
Critical equipment is monitored, and equipped with alert systems in the event of suspicious behavior. More generally, the entire IT infrastructure is protected from threats such as viruses, and advanced attacks. This additional protection is ensured by the active supervision of a dedicated team at an external service provider, 24/7.

At each site, computers and servers are regularly updated to ensure they are equipped with the latest security measures. Internal and external audits are conducted every two years to test the Group's robustness against targeted attacks. Regarding cybersecurity and data protection, intrusion tests have been conducted by an external firm since 2018.

Rules to ensure compliance with the GDPR are applied at each of the Group's European sites. Subsidiaries outside the European Union have data protection policies specific to the regulations in force in their country. A GDPR analysis is carried out at each site, according to its regulations, by the payroll department to ensure compliance with communication rules, retention schedules, and alert rules.

Since 2023, in an effort to address the risks of threats to "nomadic" devices (mobile phones, tablets, laptops), multi-factor authentication has been implemented to access Clayens VPNs. Similarly, access to "public cloud" applications can only be achieved through multi-factor authentication.

METHODOLOGICAL NOTE



METHODOLOGICAL NOTE

Selection of indicators

The CSR performance indicators were defined with regard to the Group's activities, as well as the social and environmental issues that arise from them.

They enable operational management of the progress of the approach on each of the areas of progress that Clayens has defined. They also enable transparent reporting of the Group's extra-financial performance, in this annual report, as well as to the Group's various stakeholders, both internally and externally.

Clayens' CSR program is part of the SASB ("Société de Solidarité Sociale de la Développement"). Through its CSR strategy, the Group contributes to 12 of the 17 Sustainable Development Goals defined by the United Nations. The calculation, measurement, and analysis methods used comply with appropriate national or international standards, where they exist. As part of its CSR strategy, the Group has set itself around twenty objectives, with a more or less long-term horizon (from 2024 to 2030). The results of these selected key performance indicators are available in the "CSR Approach" section. These performance indicators are analyzed for their progress, namely whether they are compliant or not. This allows us to see whether they are stable or in the process of being deployed.

Reporting management

The Executive Committee is responsible for coordinating the reporting process and centralizing the indicators collected from the various business lines. It ensures compliance with the reporting schedule and, in consultation with the business lines, organizes the external communication of data, particularly in the context of audit questionnaires and the Group's annual report. The business lines ensure the overall consistency of reporting and are the preferred contacts for external auditors. The collection of CSR indicators is managed by these same business lines in their respective areas of expertise. The departments rely on their network of local experts who are the data contributors.

Consolidation and internal control

The Business Departments ensure internal control of the data for which they are responsible, by validating its consistency and plausibility. To do this, they carry out consistency tests on the indicators that lend themselves to it (highlighting and justifying variations from one year to the next, calculating ratios to compare the performance of different entities, etc.). Any significant differences identified are subject to an in-depth study, in consultation with the data contributor; and are corrected if necessary.

The Business Departments are also responsible for consolidating the data collected in order to generate the Group indicators (present in this report), which they communicate to the Executive Committee.

Reporting tools

The data is collected and consolidated through several collection systems, under the responsibility of the business departments that manage them.

All data relating to environmental and Health and Safety indicators are collected by the Group EHS Department, using Fabriq, a reporting monitoring software.

Most of the data relating to social indicators, with the exception of data relating to Health and Safety, are collected via internal spreadsheets and the payroll software within the French scope of the Group by the Group Human Resources Department.

Some data comes from information systems deployed within the Group, for example, our integrated management software SAGE X3 or by direct evaluation, in particular for responsible purchasing reporting.

METHODOLOGICAL NOTE

Reporting scope and period

The data published for the year 2024 concerns all of the Group's entities and subsidiaries integrated as of December 31, 2024, with some exceptions. The data collected covers the period from January 1 to December 31, 2024.

According to the indicators, these are:

- from an annual consolidation of data from January 1, 2024 to December 31, 2024
- of the data measured as of December 31, 2024

Social and Health-Safety of own workforce

Clayens' social reporting covers all of its industrial sites and subsidiaries (in France and abroad) including at least one employee on a fixed-term contract, or an indefinite-term contract during the period from January 1 to December 31, 2024 (except where mentioned).

Environment

Environmental reporting includes all industrial sites of the Group and its subsidiaries.

The water consumption indicator is reported on a headcount basis.

The direct impacts of subcontractor and supplier activities carried out within the sites are accounted for by the site. The impacts of subcontractor and supplier activities carried out outside the sites are not accounted for by the sites. Subcontracted production activities are not accounted for.

The emission factors linked to electricity consumption for the Maghreb and Mexican sites come from ADEME.

The emission factors linked to consumption for French and European sites come from the residual mix report of the Association of Issuing Bodies (AIB), available on their website.

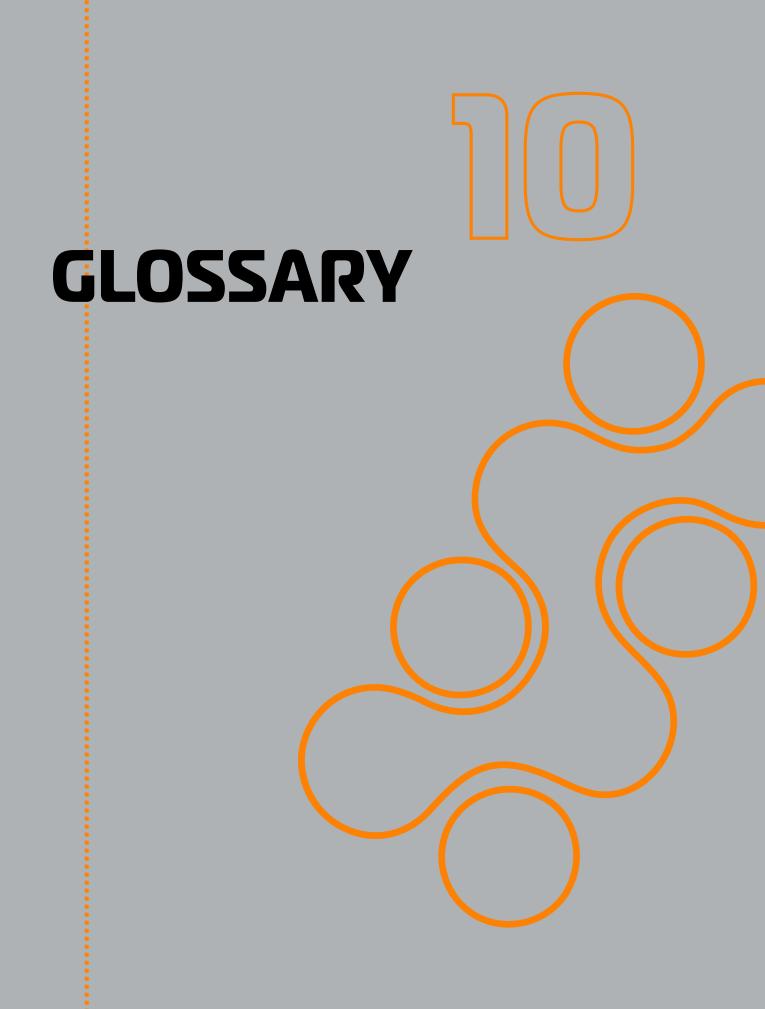
For fuel oil, natural gas and propane, refrigerants, gasoline and diesel, the emission factors are those of ADEME.

The method for calculating the carbon footprint of Scopes 1, 2 and 3 is that of the Bilan Carbone Association, based on the method developed by ADEME.

The evaluation was carried out using a method based on primary data collected internally, for Scope 1 and 2, and externally, for Scope 3.

For Scope 3, the calculation is based, in part, on primary data from our external stakeholders, particularly for business travel, the distances traveled are taken from our travel agency's reporting. For staff travel (home/work), the data was collected via an employee survey.

All GHG measurements are compliant, and validated as such by the SBTi in its Group strategy validation report, with the GHG protocol.



GLOSSARY

Antitrust laws: Law giving the right to competition to avoid monopolies

AMDEC: Analysis of Failure Modes, their Effects and their Criticality

ATS: Applicant Tracking System (application management tool)

CEO: PDG de Clayens

CMRT (Conflict Minerals Reporting Template): Conflict Minerals Reporting Template

COMEX: Executive Committee

Compliance: English term designating conformity

CPI: Corruption Perception Index

CSR: Corporate Social Responsibility

CSRD : Corporate Sustainability Reporting Directive

CSSCT: Health, Safety and Working Conditions Commissions

DD: Hazardous Waste

EA: Adapted companies

EGQA: General Purchasing Quality Requirement

EHS: Hygiene, Safety, Environment

ELV: End-of-Life Vehicles

EMEA: Europe, Middle East and Africa sector

EPC: Collective Protection Equipment

ERP: Professional Risk Assessments

ESAT: Work Assistance Establishments and Services

Expert: An employee with proven experience in one or more technical fields, enabling them to develop autonomy, train colleagues, and transfer their know-how. They possess one or more rare skills that are essential to the company's operations. This expertise is assessed during the annual performance review.

FTE: Full-Time Equivalents

GDPR: General Data Protection Regulation

GLOSSARY

GHG Emissions: Greenhouse Gas Emissions

GPI: Industrial Plastic Granules

HRD: Director of Human Resources

HRIS: Human Resources Information System

ILO: International Labour Organization

Key Talent: Employee with high performance (assessed during the annual interview, and who has at least one year of seniority in the company), and high potential (over the current year).

KPI: Performance Indicators

LCA: Life Cycle Analysis

LME: Economic Modernization Law

M.O.I.: Indirect Labor

Multinational pooling system: System for pooling health insurance coverage placed in several countries

MSD: Musculoskeletal Disorders

MSDS: Safety Data Sheet

NAM: North America Sector (United States and Mexico)

PA: Polyamide

PA: Improvement Proposal

People Doc: Cloud platform (SaaS) for centralizing HR documents

PFAS: Perfluoroalkyl and polyfluoroalkyl substances

PP: Polypropylene

PPA (Power Purchase Agreement): Electricity Purchase Contract

PPE: Personal Protective Equipment

PPM: Parts Per Million

PSCR: Product Safety and Compliance Representative in the automotive industry

R&D: Research and Development

GLOSSARY

REACH (Registration, Evaluation and Authorization of Chemicals): Registration, Evaluation and Authorization of chemical substances

RFQ (Request for Quotation): A request for a price offer

RoHS (Restriction of hazardous substances in electrical and electronic equipment): Restriction of hazardous substances in electrical and electronic equipment

Scorecard: Evaluation sheet

SEC: Social and Economic Committee

SME: Small and Medium Enterprise

SR: Safety/Regulations

Success Factors: SAP Publisher SIRH Solution Name

SST: Health and Safety at Work

SVHC (Substances of Very High Concern): Substances of extremely high concern

SWOT : Strenght, Weakness, Opportunities and Threats

TPE: Very Small Enterprise

VPN (Virtual Private Network): Virtual private network

VPPA (Virtal Power Purchase Agreement): Virtual Electricity Purchase Contract

VOC: Volatile Organic Compounds

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