



Corporate Social Responsibility Report

Deville ASC - 2022

Presentation of the Group, its values, and principles

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Presentation of the Group, its values, and principles

The Devillé Group is a family business, created by Roger Devillé in 1934 and established in Baugé-en-Anjou since 1959. Over the years, the company has developed, and then established itself in Poznan (Poland), in Beaucouzé, Chasseneuil and Jihlava (Czech Republic). Today Devillé group is managed by Cédric PICARD, who is a continuation of the Devillé family DNA.

Specialized in the automotive sector, the group co-designs and manufactures metal or plastic parts and sub-assemblies for passive or active safety, for manufacturers of seat belts, airbags, etc. and steering columns as well as parts related to the electrification of vehicles.

After having developed its activity and consolidated its European presence, the Group aims to expand on the American continent. One of the strengths of Devillé Group, which has enabled this continuous growth, lies in the richness and diversity of skills of its human capital.

In addition of this co-development activity, Deville Group sets itself apart from its competitors through an approach aimed at achieving total customer satisfaction. It is reflected in particular by a zero-defect approach and great flexibility.

The production activity of automotive safety parts makes it a natural CSR group, with the ultimate objective of saving lives. This CSR approach has now been evaluated by the Ecovadis organization every year since 2021 (silver medal award in 2022). This assessment illustrates the dynamic that drives the Group and its employees. Together, they become better, more efficient, and above all more responsible on social, environmental, and societal issues.

We are committed to this process based on part of the UN sustainable development goals. The main ambitions and objectives are grouped together in a summary table (see annex)



1. Labor and Human Rights

30 human rights are defined by the United Nations. They include the right to life and security, health, respect for private life, freedom of expression, access to decent work. The Devillé Group is made up of women and men whose actions and activities have an impact on many internal and external stakeholders as well as on the environment. It is therefore our responsibility to ensure that human rights are respected daily.



- **Preservation of health and maximum safety**

“Accidents are no longer a fatality, together let’s make a safety reality”.

Cédric PICARD – CEO

Devillé Group strives to reduce the risk of accidents at work and occupational injury (repetitive strain injury). Responsibilities in terms of health and safety are clearly defined, communicated, and shared.

Safety is everyone’s responsibility, but many people, more specifically, support the deployment of the group’s safety policy: Health and Safety Coordinator, Social and Economic Committee, Health, Safety and Working Conditions Commission, Local Representatives, First Aid Workers.

Health and Safety training is provided to each employee, particularly when joining or returning to work after an absence of 2 months or more, to make them aware of the risks associated with their activities. At each integration and in any event during each internal transfer, our teams are trained for the activities for which they are responsible. The teams of in-house trainers and tutors who receive regular training ensure that each employee is made aware of the identified risks in their workplace and that they adopt good practices.

We implement special precautions for vulnerable categories of employees (pregnant women, young mothers, employees with disabilities, night workers in particular). Employees over the age of 58 are made aware first of the fight against cardiac arrest and life-saving actions. First aid medicine cabinets and fire extinguishers are readily available at all workplaces. The sites are also equipped with cardiac defibrillators. We limit the exposure of our employees to hazardous chemicals and/or processes as much as possible. Personal protective equipment is available to the employees concerned on a self-service basis and is fully supplied by Devillé Group.

Health, safety, and environment incidents as well as “near misses” are reported and systematically investigated to improve health and safety and prevent any recurrence. Our health and safety indicators are monitored, communicated, and shared. The following are then analyzed at least once a month: the frequency rate, the severity rate, the number of accidents with and without leave.

Emphasis is placed on the single Occupational Risk Assessment Document (DUERP in French): Department and workshop managers work continuously on the prevention of accidents and occupational injuries (Musculoskeletal Disorder - MSD in particular), by improving the risk management, to provide all our employees with a safe and suitable working environment. We therefore implement appropriate precautionary measures to anticipate workplace -related hazards and protect our employees against these risks. Each employee must behave responsibly to limit risk-taking while respecting the rules to preserve their health, their moral and physical integrity as well as their safety, and that of their colleagues.

Expected state of mind: Play an active role in your health and safety **and** that of your colleagues.

Each employee has the duty to withdraw from any situation of danger of serious and imminent accident; non-compliance with health and safety standards may result in disciplinary action.

- **Working Conditions**

We ensure that all employees benefit from a universal social protection base and aim to enable them to find a balance between their personal and professional lives. Salary negotiations take place annually with our social partners in a climate of responsible and reasonable exchanges. Agreements are signed by our union delegates: wages, time savings account, professional equality between women and men, profit-sharing, participation, working time, etc.

The normal working week is limited to 48 hours and 44 hours per week on average over a period of 12 consecutive weeks. Overtime is usually paid at a premium rate (25% or 50%). However, we regularly assess the number of employees required to achieve the objectives set to limit the use of overtime. We respond to the requests of our employees to balance personal and professional life as well as possible.

Our salary policy is based on internal equity and the principle of non-discrimination.

We carefully study any request for part-time work. In this area, our human resources policy is based exclusively on part time work chosen for any personal reason (childcare, training, health problems, etc.) None of our employees work part time because they have not been offered a full-time job within our organizations.

“Healthcare and welfare costs” solutions guarantee our employees tailor made support at all stages of their lives (work stoppage, maternity, birth, family events, death) that go well beyond the legal minimums.

- **Career Management (recruitment, training, and development)**

Our values are deeply rooted in respect and form the foundation of our diversity, equity, and inclusion policy. We are convinced that the diversity of skillset of our workforce is a real asset. We are therefore committed to seeing our employees thrive on a daily basis in an inclusive work environment.

Fair treatments is one of the foundations of Human Resources Policy. It translates into concrete action in terms of:

- Recruitment, integration, and retention in employment of people with disabilities.
- Professional equality between women and men
- Intergenerational
- Equal opportunities

We also implement proactive policies in favor of well-being and quality of life at work, so that our employees work in the best conditions. We offer internal and external training for our employees, paid for by the company, so that they can best meet the constantly changing needs of our business. The size of the group and the diversity of our business offer regular opportunities for internal development so that everyone can also develop their careers.

- **Freedom of expression and intra-company dialogue**

Local supervision is available for each employee of Devillé Group to gather new ideas and proposals for improving the Quality of Life at Work. These exchanges take place in an atmosphere of active listening and volunteering. Daily, weekly and/or monthly meetings take place and are established in each department to guarantee top-down communication, while promoting individual feedback.

Social dialogue with the Staff Representative Bodies occupies a central place in our organization. We guarantee freedom of opinion, freedom of association. Managers are informed of the role, powers and resources made available to elected or appointed employees and of the time devoted to the exercise of their mandate. Staff representatives have access to workplaces, this guaranteeing them freedom of movement. Premises are made available for them as part of the exercise of their mandate and/or the social and Economic Committee. Employees can then meet their representatives, during the meetings organized each week.

Staff representatives have access to company agreements, as well as all information useful for their mission, in compliance with the rules of confidentiality and security of Devillé Group. Any employee who wishes, may be accompanied by the employee representative of their choice (and in general by all employees of the company) for any disciplinary procedure or related question.

We are committed to developing harmonious working relationships with respect for individuals.

- **Protection of personal data**

Deville Group undertakes to process the personal data of internal and external stakeholders in full compliance with applicable data protection regulations and in particular the new General Data Protection Regulations (GDPR). Employees processing flows of personal data are regularly made aware of good practices in terms of the GDPR to ensure that they are processed in accordance with the regulations daily. Respect for privacy is one of the fundamental pillars of our internal processes.

Deville Group's Data Protection Officer (DPO) updates existing procedures as needed, specifying the forms of personal data collection, management, storage, storage location and access procedures to this data. Employees and employee representative bodies are informed of any surveillance of the workplace and the reasons justifying such activity.

Each employee has access to all personal data concerning themselves, collected by Devillé Group (with exception of confidential management information). The collection and management of data are carried out in a non-discriminatory manner.

- **Prohibition of discrimination**

Deville Group takes all necessary measures to ensure that no job seeker or employee are victim of discrimination. In addition, no employee can be sanctioned for having reported significant and proven discrimination. Strong advocates of inclusivity within our organizations, we ensure that every decision is based on objective criteria. No discrimination is tolerated in our Human Resources Policy.

Hiring, the development of salary policy, access to training, internal promotion and dismissals are based on perfectly objective criteria, this excludes any consideration of sex, gender, sexual orientation, disability, state of health, political or union opinions, origin, religion, and any other criteria prohibited by the Labor Code. Particular attention is also paid to groups of vulnerable people

whose human rights are unfortunately, more often, exposed to violation. Maternity or Paternity leave and adoption leave have no negative impact on future compensation or on the careers of the employees concerned within the Group. Pay increases are granted during maternity and paternity leave as if the employees concerned were at work. The minimum remuneration and the status of our employees are based on objective factors related to the job.

Our non-discriminatory job advertisements are also meant to be inclusive. No information relating to family status, pregnancy, intention to have children or other is asked during the recruitment process. Managers in charge of recruitment are trained on our non-discrimination policy. For qualified people with disabilities, reasonable accommodations are regularly implemented in collaboration with the occupational health services.

- **Fight against moral and sexual harassment and against sexist acts**

Devillé Group prohibits any sexual or moral harassment, at any level, and works to prevent harassment and sexist behavior. We protect our employees against all forms of moral physical, verbal, sexual or psychological harassment or other abuse and threats. Appropriate disciplinary measures are taken if necessary. Our employees are made aware of and informed of their obligations to refrain from any violent, threatening, or abusive behavior. Managers are made aware of the fight against such behavior. They are then able to identify and deal with a situation of harassment. Harassment and sexist acts referents are appointed and trained on the subject.

The common management procedure for sexual and moral harassment and violence at work is communicated to each employee, during their integration. It can be viewed by everyone on the communication screens. Any employee who considers themselves to be a victim of acts constituting moral harassment, sexual harassment, or sexist acts of violence at work can inform a harassment referent. Any report of harassment or violence in the workplace is investigated with due process. Appropriate preventive and disciplinary measures are put in place. They can go as far as reporting criminally reprehensible activities to the competent public authorities.

- **Prohibition of child labor and forced labor.**

Devillé Group does not tolerate any form of forced labor. An employment contract specifying all the working conditions such as salary, working hours and significant employment activities is given to each candidate before their first day of work. Employees are free to resign subject to compliance with the legal or contractual notice period. Copies of personal documents of employees (identity cards, passports, driving license, family book, etc.) are requested for the updating of the personal data of our employees. In any case, none of these official documents are retained by our services. If work certificates or other documents are necessary for the employee to take leave, these documents will be given to them without delay.

The employment of employees who do not have the minimum legal age for hiring and in any event, who are under the age of 16, is prohibited. The age of employees is verified when the employment contract is drawn up prior to taking up their duties. Copies of their official document indicating the name, date of birth and a photo of the employee are requested by Human Resources department and kept in their personal file. If necessary, the Human Resources teams are trained in the identification of common frauds concerning the falsification of personal identification documents.

Employees, aged 16 to 18, benefit from specific working conditions. They are prohibited from carrying out dangerous work or working at night. In accordance with the international conventions in force and the legislation governing employment, Devillé Group strictly refuses to employ children under the age of 16 and respects the legislation governing the work of young people aged 16 to 18. Reception within the group is possible for any young person under the age of 16 as part of a discovery and observation internship framed by a tri-party agreement (trainee, company and training center, work experience)

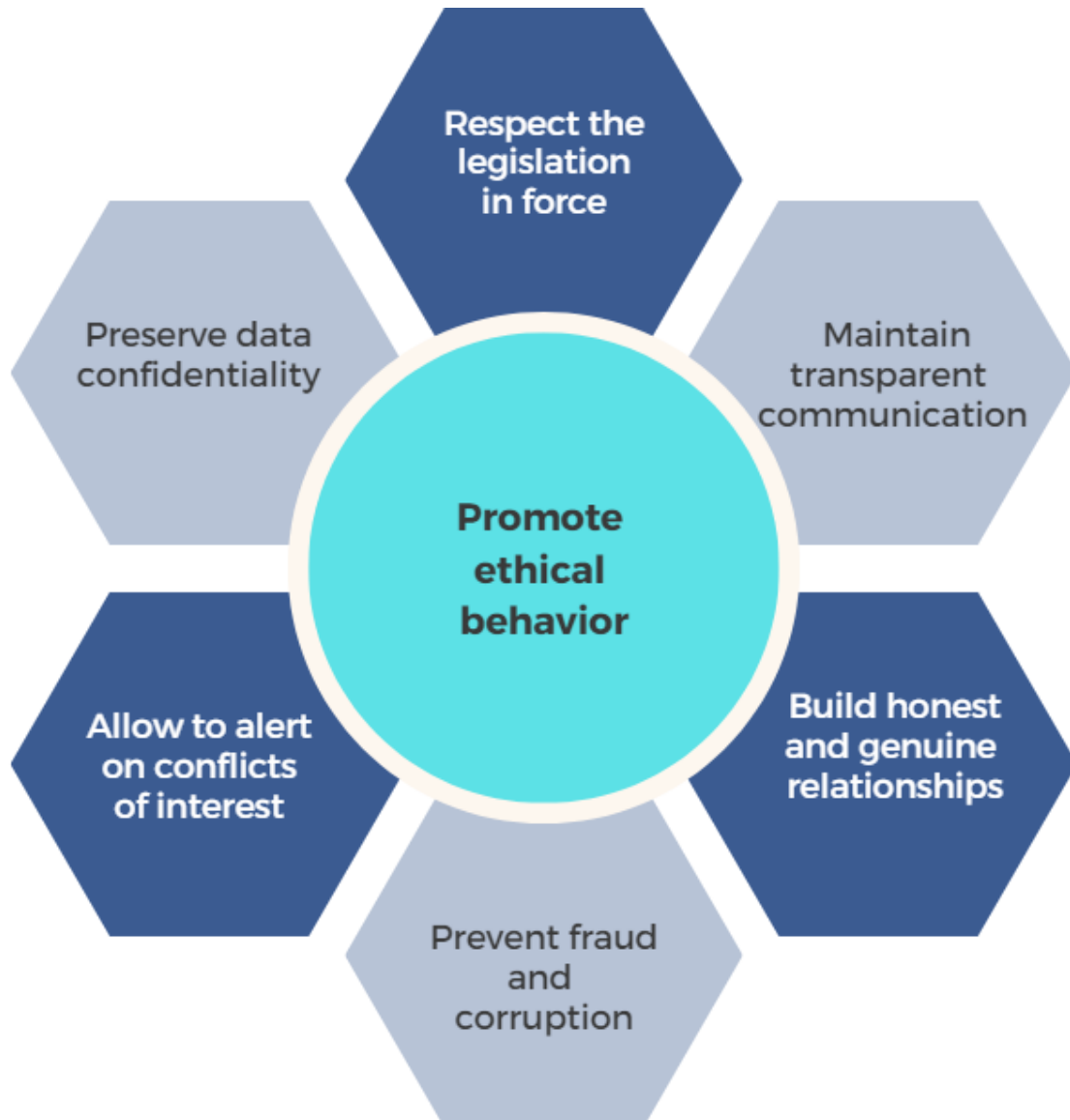
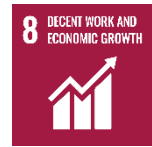
- **External Stakeholders**

Deville Group is committed to collaborate with external stakeholders, in accordance with our social and Human Rights policy.

2. Ethics

Within Devillé Group, a code of ethics has been established, and an Ethics Committee ensures that it is respected and that abuses are prevented. This committee meets whenever necessary and twice a year to draw up a report (systematically forwarded to the Devillé Group supervisory Committee) which covers:

- Any alerts and their treatment
- The preventive actions carried out.
- Any changes or improvements to its operation and/or composition



Commitments

An analysis of the risks of fraud and corruption was carried out which made it possible to identify the people who should be trained in the prevention of these risks. The objective is to ensure all employees are aware of the policies, every 3 years.

The company considers the following practices as basic principles of its operation:

- **Compliance with legislation:** National and international legal rules in force, including provisions of anti-monopoly legislation, economic competition as well as provisions concerning the prevention of corruption, money laundering, labor legislation and environmental legislation.
- **The use of financial resources,** services and/or assets of Devillé Group of illegal or abusive purposes is strictly prohibited. Neither the company nor any of its employees may make purchases or receive any benefits in the form of bribes, gifts or other forms of rewards that may be considered illegal.
- **Honesty and authenticity:** Devillé Group keeps accounting records and other evidence that clearly and precisely reflects its transactions and its real estate situation in accordance with the legislation in force and the Group's rules.
- **Market agreements with suppliers and customers:** Unconditional assurance that only quality, performance, costs, and CSR aspects are taken into account.
- **Equal opportunity:** Each employee is required to comply with the rules of economic competition.
- **Confidentiality** preserved with customers and suppliers.
- **Conflict of interest:** If an employee has any doubts about the possibility of preserving the interests of Devillé Group in relation to their own (or a member of their family), they must alert their direct manager by asking their opinion on the risk of conflict of interest.
- **Data protection:** Devillé Group is committed to respecting the principles of GDPR and has established a charter which specifies the terms of application.

On these general aspects, each employee has the right to alert if they become aware of actions contrary to these practices. Information on the existence of the right to alert has been given to each employee and “whistleblower” procedure is accessible to everyone on all the company’s communication screens.

3. Environment

Climate change, the scarcity of resources and pollution linked to fossil fuels are the main sources of the current environmental problem that have prompted Devillé Group to adopt a process of accountability and control its impacts. In addition to the evaluation of its CSR approach by Ecovadis, Devillé Group has been ISO 14001 certified since 2015 and has participated in the carbon Disclosure Project (CDP) since 2021. All these organizations specializing in the field of the environment allow Devillé Group to build real expertise, aiming to propose a roadmap, with a clear and defined objective.





Commitments


Deville Group is committed to reducing the impact of its own activities on the environment, by reducing the consumption of resources and energy and by optimizing the creation, removal, and disposal of waste in all phases of each process. All group companies are ISO 14001 certified.





Levers for reducing our environmental footprint:


- **Reduce our carbon footprint:** Devillé Group is committed to greenhouse gas (GHG) reduction targets of 70% for scope 1 and 2 and 40% for scope 3, based on 2019 data and this by 2030.



- **Water conservation:** Water is a precious commodity and Devillé group is committed to improving its specific consumption while limiting its withdrawals and guaranteeing the quality of discharges into the natural environment. Our water consumption reduction targets are set at -50% by 2030 (base 2019).


- **Protecting biodiversity:** Devillé Group undertakes to comply with the standards in force concerning biodiversity, by guaranteeing the protection of soil, animal, and plant species around its activity.
- **Controlling local pollution:** Devillé Group undertakes to control all sources of local pollution generated by its activity and the use of its products, in particular GPI (Industrial Plastic Granules). The company complies with decree N° 2021-461 of April 16th, 2021, relating to the prevention of industrial plastic pellet losses in the environment (inspections every 6 months and audits every 3 years with a “favorable” conclusion).


- **Control the environmental impact of the use and end of life of its products:** As the final design of the products is under the responsibility of its customers, Devillé group cannot ensure control from the point of view of environmental impact during their use and at the end of their life. However, Devillé Group actively participates, during product co-design, in minimizing environmental impacts.
- **Manage waste:** Devillé group activities lead to production of waste; to limit their impact, the company is committed to maximizing their recyclability and reaching 35% by 2030 (base 16% in 2019). Other waste is sent to the most efficient recovery channel and its generation is restricted as much as possible.


- **Controlling the use of chemical products:** The Group evaluates its chemical products and makes sure to use, and this under controlled conditions, only the least aggressive substances for its personnel, for the users of the products and for the environment. The company is committed to 100% monitoring of hazardous waste.
- **Eco-mobility:** For its employees, Devillé Group is committed to a voluntary approach to promoting soft mobility, alongside Mobil’Ethic and Karos. It is transforming its vehicle fleet to 50% electric or hybrid by 2030 (0 in 2019)



4. Sustainable Procurement

Devillé Group is committed to applying good CSR practices to its suppliers and service providers and has drawn up a “supplier code of good conduct” to which we ask them to commit. Devillé Group shares with its employees a set of common rules, values, principles, and practices as summarized below.



Commitments

In the context of the partnerships that we maintain with our suppliers and our service providers, we demand the same respect for these common rules and values. Devillé Group promotes exemplary, responsible, and fair relations with all its suppliers. It is also important that the latter implement this sustainability approach throughout their supply chain by ensuring the continuity of these requirements with their own suppliers.

- **Business Ethics**

In accordance with the United Nations Global Impact, as well as the recommendations of the OECD and the organization Transparency International, our business conduct policy aims to manage customer/supplier relations in an ethical and honest manner, and in strict compliance with all laws and regulations. These principles should apply to any business decision for every sector of society.

- **Working Condition and Human Rights**

We expect our suppliers to ensure the protection of their workers and to promote health & safety culture by providing a safe working environment for their employees by committing to comply with all standards and international regulations applicable locally in terms of occupational risk prevention.

Suppliers are required to promote equal opportunity and must not tolerate any discriminatory practices. It is their responsibility to implement the necessary measures and to uphold the principles of equality and equity. No form of harassment should be practiced, whether psychological, moral, sexual or abuse of authority. Any form of work assigned to an employee under threat or coercion is strictly prohibited. In addition, the work of children under the age of 18 for any dangerous work is to be prohibited in accordance with the conventions of the International Labor Organization relating to child labor.

- **Towards an environmental approach**

Devillé Group encourages preservation and respect for the environment. We strongly encourage our service providers to commit to an environmental certification process.
















The implementation of an energy management system aimed at continuously improving energy performance and optimizing energy savings is recommended. In the same way, a plan to reduce greenhouse gas emissions, improve quality and reduce water consumption must be put in place.

As part of our partnership, we encourage our suppliers to play an active part and drive forward about environmental protection. They can support us to reduce our consumption of raw materials and energy, optimize natural resources and reduce waste during the design, manufacturing, distribution, use and recycling phases of all our products.

- **Protection of information and intellectual property**

Devillé Group and its business partners are required to comply with all applicable laws and regulations regarding the processing of personal data, and in particular the EU General Data Protection Regulation. Devillé Group protects its skills and expertise in the same way as those of its partners. Confidential information (technical, financial, personal, intellectual property, etc.) must not be disclosed, on either side. In the event of subcontracting, the sharing of confidential information requires a nondisclosure agreement (NDA) of Devillé Group. Suppliers must ensure the confidentiality and privacy of information relating to customers and employees of Devillé Group, in accordance with applicable law.

CSR Report

DEVILLÉ GROUP							
CSR Theme	Sub-theme	Ambitions	KPI (Based on GRI*)	Objectives 2022	Results 2022	Objectives 2023	SDG** theme from UN
Social and Human Rights	Occupational Health and safety	Tend towards 0 accident and 0 occupational injury	- Number of accidents at work with sick leave - % of risk control actions reviewed in relation to the objective	-50% N/A	-18% / 2021 (18 Accidents in 2022). Beginning of improvement related to the security project, to be perpetuated - New indicator: review of the control of risks identified in the DUERP	-45% 90%	
Social and Human Rights	Formation	Ensuring the match between the needs of the company and the expectations of employees	Number of hours of training / person	10,0	12,0 h of external training In 2024, this indicator will include in-house training hours (including at the workplace)	13,0	
Social and Human Rights	Diversity	Ensuring professional equality between men and women	Equality index W/M	85/100	87/100 : Continuity of implementation of the action	85/100	
Environment	GHG emissions	By 2030 (Base 2019) - 70% reduction on Scope 1 et 2 - 40% reduction on Scope 3	Emissions in tCO ₂ eq.	S1 : - 18% S2 : - 18% S3 : - 12%	- Scope 1 : - 36% (1 286) - Scope 2 : - 33% (409) - Scope 3 : - 36% (28180)	S1 : - 24% S2 : - 24% S3 : - 16%	 
Environment	Water consumption	By 2030, 50% drop on water consumption (base 17 000m ³ en 2019)	Consumption in m³	- 13,5 %	- 39% : decrease in total water consumption linked to an effective action plan	- 18%	 
Environment	Waste	Continuously increasing waste recycling	Recycled waste rates	18%	27% : Total weight of recycled waste / total weight of waste produced (hazardous and non-hazardous)	30%	
Responsible Purchasing	GHG emissions	By 2030, 50% reduction in emissions (base 2019) on scope 3 (MP, purchasing and upstream transport)	GHG emissions in t CO ₂ eq.	N/A	New indicator 2023	-15% (in 2025)	 
Responsible Purchasing	Code of conduct Suppliers	Development of CSR and validation of our expectations expressed in the Code of Conduct for the entire supplier panel	Rate of suppliers who have validated the Code of Conduct	40%	40% of validations since deliveries made mid 2022	80%	 
Ethics	Business Ethics	Outreach to targeted staff	Rate of people aware over a period of 3 years	N/A	New indicator 2023	100%	 
Ethics	Fraud and Corruption prevention	Outreach to targeted staff	Rate of people aware over a period of 3 years	N/A	New indicator 2023	100%	 

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* GRI : Global Reporting Initiative

** SDG: Sustainable Development Goals